
Simpson Farms Project

Biological Technical Report

PDS2005-3100-5460; 3910-05-19-023

January 19, 2016



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County of San Diego

Planning & Development Services

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SUMMARY

At the request of Gotham Management, LLC (Project applicant), HELIX Environmental Planning, Inc. (HELIX) has completed a biological technical report for the proposed Simpson Farms Project (proposed Project) located within an approximately 162.0-acre property (Project site or site) in the unincorporated community of Jamul, San Diego County, California. The proposed Project generally consists of a mixed-use development with 94 single-family dwelling units, a neighborhood commercial site and related facilities within an approximately 152.6-acre on-site impact area. An additional 0.09-acre off-site area is proposed for required storm drain improvements and modifications to the culvert beneath Jefferson Road. The Project site occurs within the Metro-Lakeside-Jamul segment of the adopted County of San Diego (County) Multiple Species Conservation Program (MSCP) Subarea Plan. The specific MSCP designation for the site is Unincorporated Land outside the Pre-Approved Mitigation Area (PAMA), outside the Hardline Preserve, and outside the Take-Authorized Area.

The Project site supports 11 vegetation communities/habitat types. In the context of the MSCP, sensitive uplands on the site include Engelmann oak woodland (Tier I), coast live oak woodland (Tier I), baccharis scrub (Tier II), Diegan coastal sage scrub (Tier II), and non-native grassland (Tier III). Sensitive wetland/riparian habitat types on the site include southern coast live oak riparian forest (Tier I) and southern willow scrub (Tier I). Non-sensitive habitat types or land uses on the site include eucalyptus woodland (Tier IV), non-native vegetation (Tier IV), disturbed habitat (Tier IV), and developed land. An additional non-sensitive habitat type, orchard, was mapped at an off-site location. None of these habitat types meets the criteria for Biological Resource Area Core (BRCA), as defined in the County's Biological Mitigation Ordinance (BMO).

No listed or narrow endemic plant or animal species were observed or detected on site during surveys performed in 2014 and 2015. Five non-listed sensitive plant species were observed on the Project site, including 52 Engelmann oak (*Quercus engelmannii*), 1,096 San Diego sunflower (*Bahiopsis laciniata*), 530 California adder's-tongue fern (*Ophioglossum californicum*), two patches of ashy spike-moss (*Selaginella cinerascens*), and a single southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*). Three non-listed sensitive animal species were observed foraging or soaring over portions of the site, including Cooper's hawk (*Accipiter cooperi*), turkey vulture (*Cathartes aura*), and western bluebird (*Sialia mexicana*). An additional non-listed sensitive animal species, black-tailed jackrabbit (*Lepus californicus bennetti*), is presumed to occupy the site. Rare plant surveys were performed in April 2014 and May 2014. The site was further inspected for rare plants concurrent with other surveys performed in 2014 and 2015. Site assessment and protocol surveys for Hermes copper (*Lycaena hermes*) were completed in 2014 and were negative; Hermes copper is currently presumed to be absent from the site. Site assessment and protocol surveys for Quino checkerspot butterfly (*Euphydryas editha quino*) were completed in 2015 and were negative; Quino is currently presumed to be absent from the site. Protocol surveys for the coastal California gnatcatcher (*Polioptila californica californica*) were performed in April 2014 and were negative; gnatcatcher is currently presumed to be absent from the site. Burrowing owl (*Athene cunicularia*) protocol surveys were completed in 2014; burrowing owl is currently presumed to be absent from the site.

The site supports several ephemeral drainage features subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). Limited portions of a single ephemeral drainage feature that occurs on and off site are characterized by low quality riparian habitat and County Resource Protection Ordinance (RPO) wetlands.

Potential significant impacts would occur to special status species, sensitive natural communities, and jurisdictional waters and wetlands, including County RPO wetlands. The Project would result in direct permanent impacts to sensitive upland habitat types, including Engelmann oak woodland (Tier I), coast live oak woodland (Tier I), baccharis scrub (Tier II), Diegan coastal sage scrub (Tier II), and non-native grassland (Tier III). The Project would also result in direct permanent impacts to southern coast live oak riparian forest (Tier I), in addition to several unnamed ephemeral drainage features within the property. Additional southern coast live oak riparian forest (Tier I) would be impacted off-site immediately west of Jefferson Road for required culvert improvements.

None of the impacted habitat types meet the criteria for BRCA based on several findings, most notably: the site does not occur within PAMA and is not adjacent or contiguous with PAMA; the site does not contain a high number of sensitive species; the site does not link significant blocks of habitat; the site does not consist of and is not located within a block of habitat greater than 500 acres; the site does not occur adjacent or contiguous to undisturbed habitats; the site does not contain soils from specific geologic formations which are known to support sensitive species; and the site does not contain and does not contribute to any functioning wildlife corridor or linkage.

Impacts to the unnamed ephemeral drainage features would be subject to the regulatory jurisdiction of the USACE, RWQCB, and CDFW. The southern coast live oak riparian forest meets the criteria for County RPO wetland; however, on- and off-site impacts cannot be avoided and represent the least environmentally damaging alternative for an essential roadway crossing and required improvements to Jefferson Road. Impacts to coastal California gnatcatcher are not expected due to the fact the species was not observed during protocol-level surveys conducted over the 2014 and 2006 breeding seasons and the habitat is currently considered to be unoccupied; however, avoidance measures are proposed as the project would impact suitable habitat for the species. The project would also impact suitable habitat for nesting birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG Code).

Measures related to the following topics are proposed herein to fully mitigate potential impacts of the Project: coastal California gnatcatcher avoidance; nesting bird and raptor avoidance; compensatory mitigation for sensitive habitat, including habitat for non-listed sensitive species; and wetland permits and mitigation. Successful implementation of these measures would mitigate potential impacts to below a level of significance.

1.0 INTRODUCTION

1.1 PURPOSE OF THE REPORT

A biological resources study was conducted for the proposed Simpson Farms Project to provide the Project applicant, County of San Diego (County), resource agencies, and the public with current biological data to satisfy review of the proposed Project under the California Environmental Quality Act (CEQA) and to demonstrate compliance with federal, state, and County regulations. This report describes the site's current biological conditions, vegetation communities, and plant and wildlife species observed or detected during the surveys, and identifies those resources that are sensitive. It also identifies sensitive species with potential to occur on site, assesses potential impacts of the proposed Project, and identifies potential mitigation measures.

1.2 PROJECT LOCATION AND DESCRIPTION

1.2.1 Project Location

The approximately 162.0-acre Project site (Assessor's Parcel Numbers 596-180-01 and -02) is located in the unincorporated community of Jamul in San Diego County (Figures 1 and 2). Specifically, the Project site is located between State Route (SR-) 94 (Campo Road), Jefferson Road, Olive Vista Drive, and private properties on Hillside Drive and Via del Jamul Drive, within Section 3, Township 17 South, Range 1 East on the U.S. Geological Survey (USGS) 7.5-minute Dulzura quadrangle map (Figure 3). The street address of the Project site is 13924 Highway 94.

The Project site is located on unincorporated lands within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. The MSCP designation for the site is Unincorporated Land outside the Pre-Approved Mitigation Area (PAMA), outside the Hardline Preserve, and outside the Take-Authorized Area (Figure 4).

1.2.2 Project Description

The Proposed Project consists of a mixed-use development within a total direct disturbance area of approximately 152.6 acres, with 95 single-family dwelling units (DUs), a neighborhood commercial site, and related uses such as access roads, drainage facilities and open space. As shown on the Project Site Plan (Figure 5), individual lot categories include 91 dedicated residential lots (with 91 associated DUs), 4 lots with combined residential and detention basin use (Lot Nos. 21, 31, 41, and 96, with 4 associated DUs), 1 commercial lot (Lot No. 99), 1 detention basin lot (Lot No. 7), 2 open space lots (Lot Nos. 97 and 98; only lot 97 being biological in nature) and 7 roadway lots (Lot Nos. 100 to 106, with these not depicted on Figure 5). Summary descriptions of the noted lot types and associated uses are provided below, with additional information shown on Figure 5.

Project development would be conducted in two phases, identified as Units 1 and 2 on Figure 5. Specifically, Unit 1 would include all proposed development except the commercial site

(Lot No. 99), with commercial development requiring additional subsequent discretionary approval from the County and thus identified as Unit 2.

Residential Development

As noted above, the Proposed Project includes 95 single-family residential DUs, with 91 DUs on dedicated residential lots and 4 DUs on combined residential and detention basin lots. The residential lots range in size from 1.0 to 2.07 acres, while the combined residential/detention basin lots range between 2.05 and 2.19 acres (including associated trail/access dedications). Associated development on all 95 lots encompassing residential uses includes graded pads, driveways and septic systems/leach fields, as shown on Figure 5.

Commercial Development

The proposed commercial site would be located on Lot No. 99 in the southwestern corner of the site, at the intersection of SR-94 and Jefferson Road. This lot includes 11.8 acres, with related activities under the Proposed Project limited to the construction of graded pads and roads, and the central area encompassing existing structures to remain undisturbed (refer to Figure 5). Lot No. 99 also contains a Special Area “P” designator, and would require approval of a Major Use Permit (MUP) prior to approval of any associated development.

Internal Roadways and Site Access

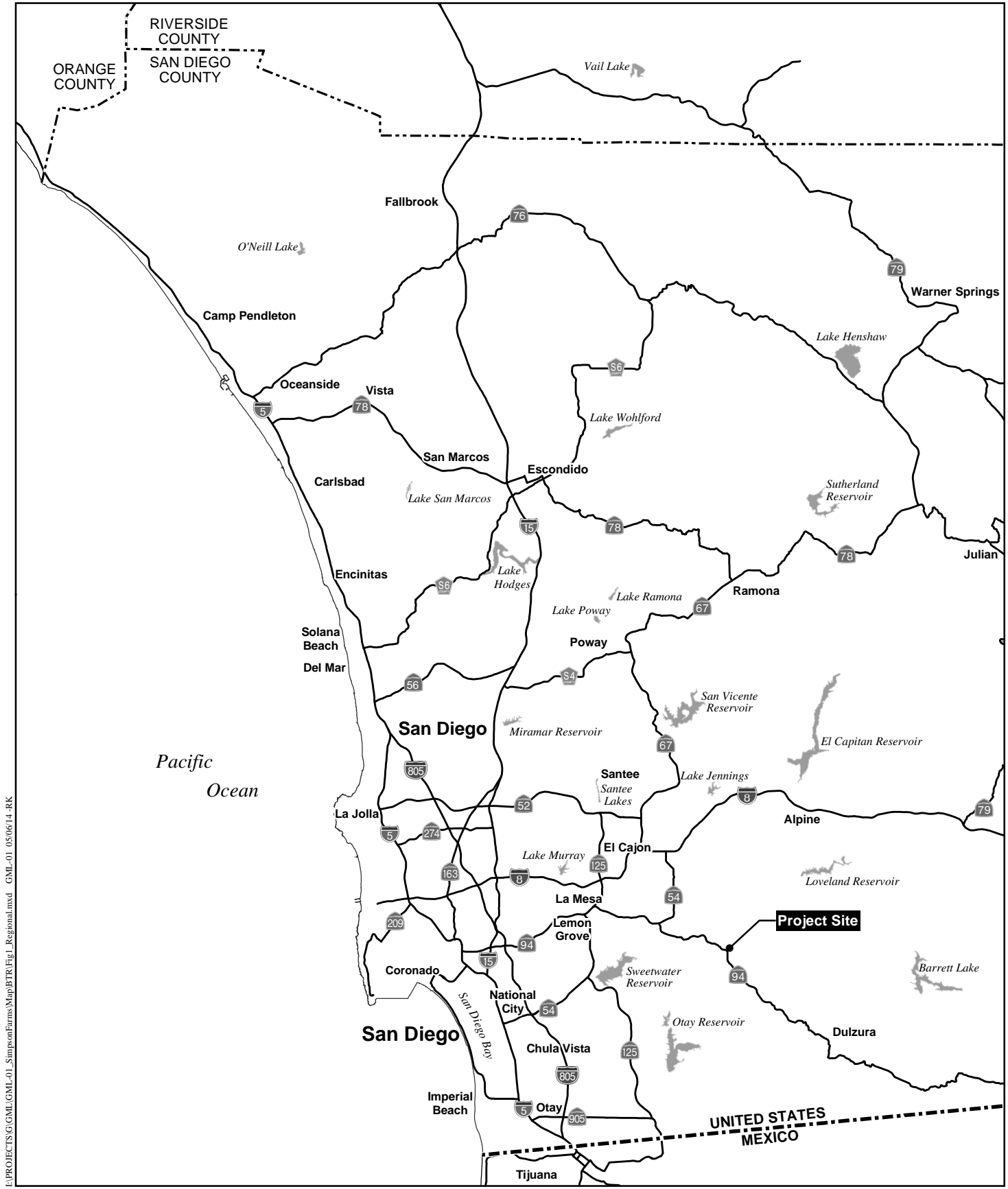
The Proposed Project design includes a network of internal private access roads within the described disturbance area, as shown on Figure 5. Internal roadways would encompass four connections to existing/modified roadways, including SR-94 (one access point), Jefferson Road (two access points), and Olive Vista Drive (one access point, refer to Figure 5). Portions of Jefferson Road adjacent to the Project site would be widened and improved to accommodate Project-related access and traffic. These proposed improvements would be located within the existing road right-of-way (ROW) boundaries or on the Project site (i.e., within an expanded ROW), with no related disturbance to occur on adjacent off-site properties. All proposed private (on-site) streets and improvements to Jefferson Road would conform to applicable County standards regarding criteria such as lane widths, grades, surfacing, intersection design and access.

Drainage Facilities

The Proposed Project would include a storm drain system to accommodate post-development flows in conformance with applicable regulatory requirements, including County storm water standards and related National Pollutant Discharge Elimination System (NPDES) criteria. Specific identified facilities include a network of variably sized inlets, pipelines, catch basins, brow ditches and the five previously noted detention basins shown on Figure 5, with this system to incorporate natural drainages where applicable and feasible.

Open Space

The proposed site plan includes two designated open space lots (Lot Nos. 97 and 98), with a combined area of approximately 7.17 acres. Both of these lots are associated with sensitive

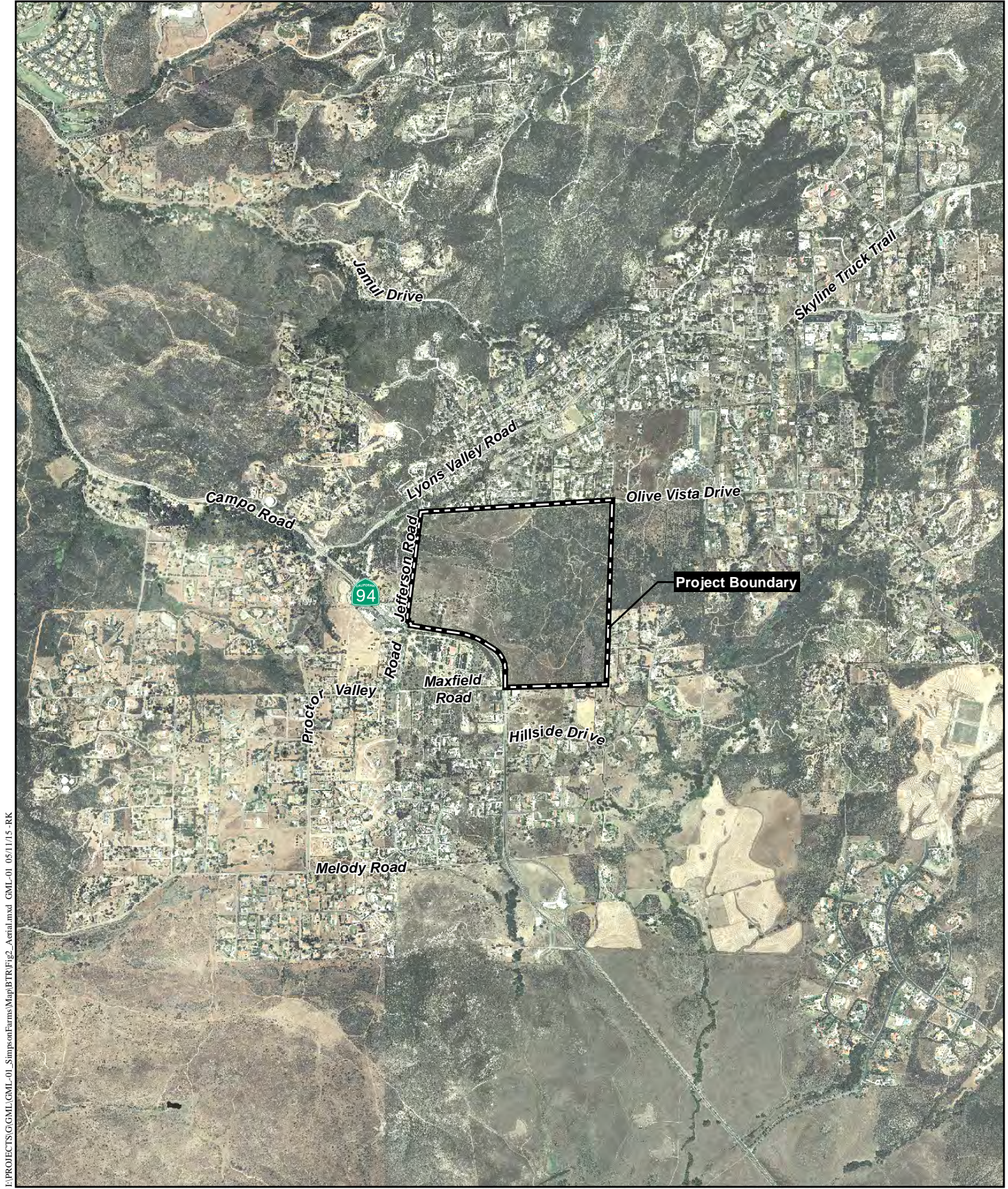


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Regional Location Map

SIMPSON FARMS

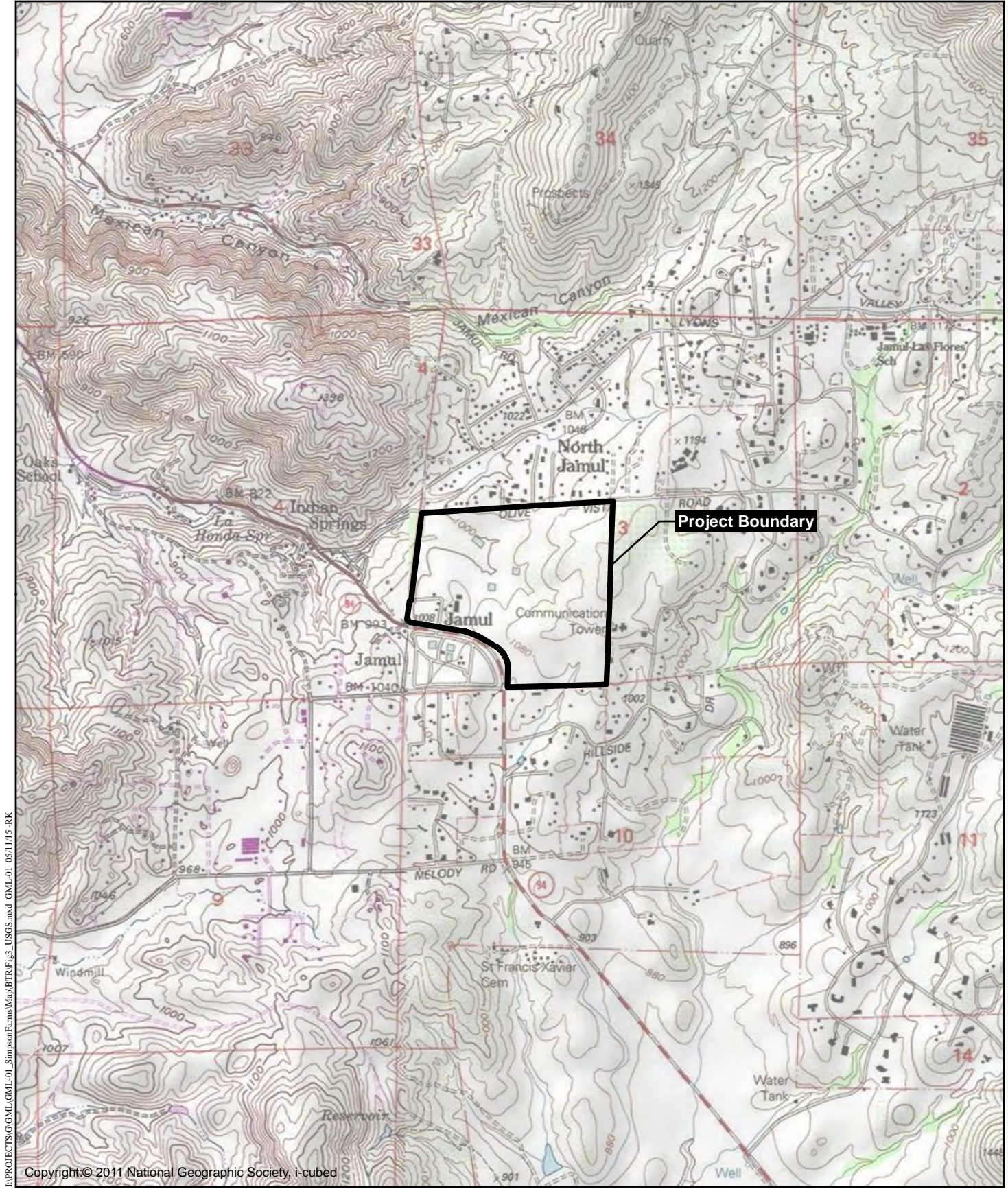
Figure 1



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Project Location Map (Aerial Photograph)

SIMPSON FARMS



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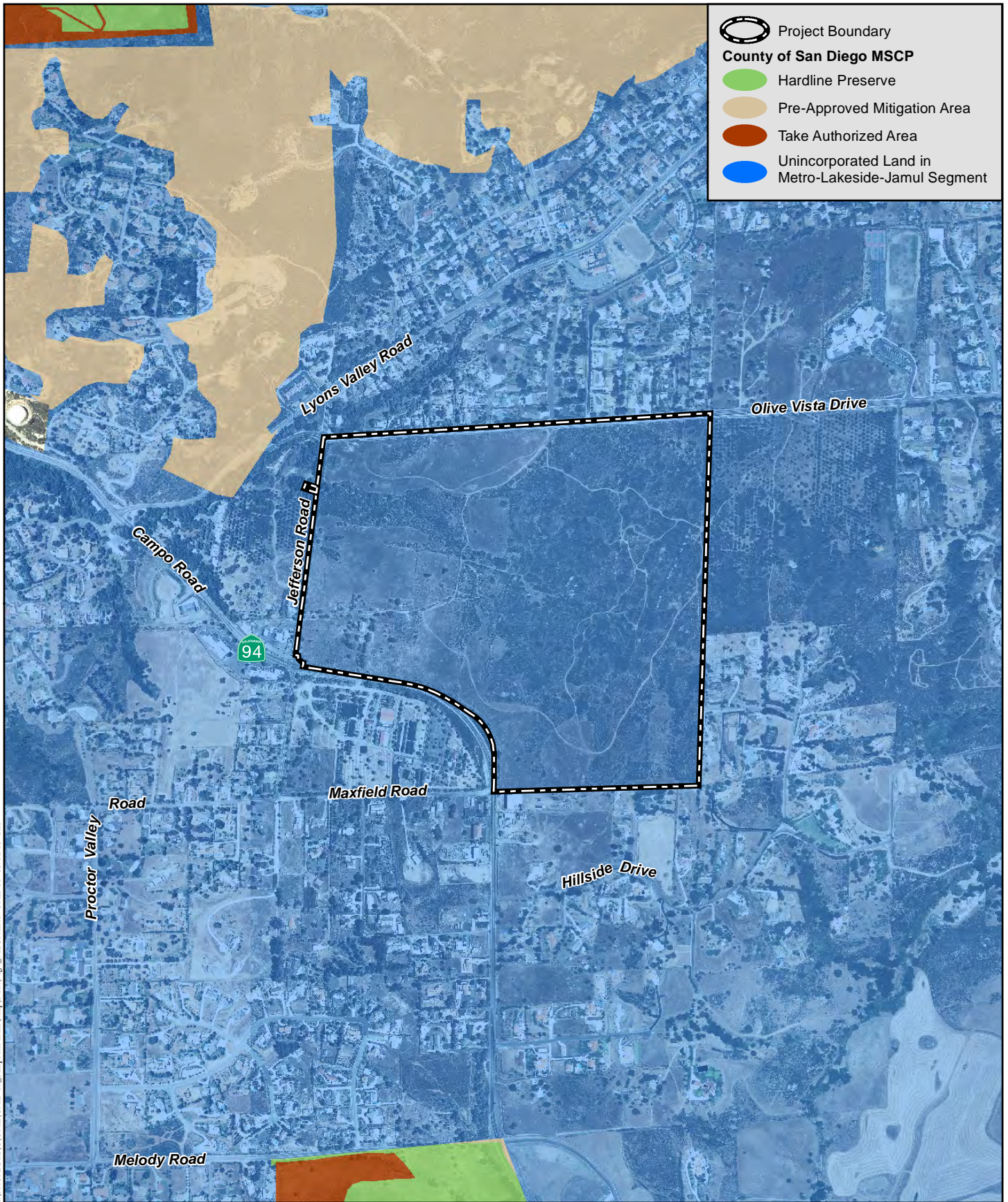
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Project Location Map (USGS Topography)

SIMPSON FARMS



Figure 3

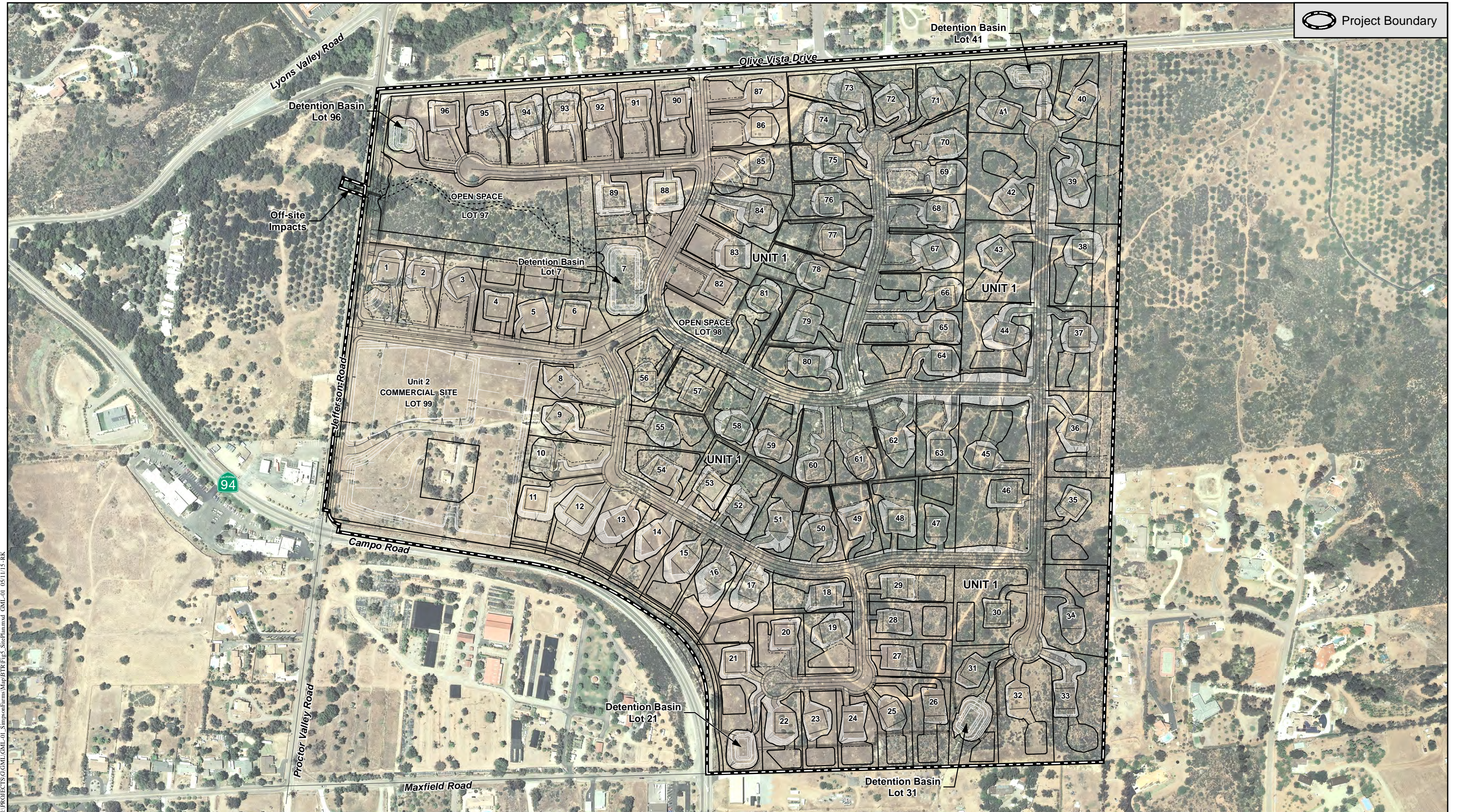


 Project Boundary
County of San Diego MSCP
 Hardline Preserve
 Pre-Approved Mitigation Area
 Take Authorized Area
 Unincorporated Land in Metro-Lakeside-Jamul Segment

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County of San Diego MSCP Map

SIMPSON FARMS



Project Boundary

Site Plan

SIMPSON FARMS

Figure 5

habitats, drainage courses and/or floodplain limits, with no proposed development. Project-related activities would be limited to brush management in association with adjacent residential lots in applicable areas.

Off-site Facilities

Proposed off-site activities include the modifications along Jefferson Road as previously described, utility connections within existing ROW boundaries along Jefferson Road and Olive Vista Drive, and drainage improvements west of Lot No. 97 and Jefferson Road (including a pipeline extension and associated headwall and riprap energy dissipation structures, refer to Figure 5). Because the off-site portions of the proposed roadway improvements and related utility connections would be confined to previously developed or disturbed areas within current ROW limits, they would not directly affect off-site properties or associated agricultural resources. The off-site drainage improvements west of Lot 97/Jefferson Road are outside of the associated ROW, however, and related potential impacts are assessed herein.

1.3 SURVEY METHODS

1.3.1 Literature Review

Prior to conducting biological field surveys, HELIX Environmental Planning, Inc. (HELIX) conducted searches of the California Natural Diversity Database (CNDDDB; 2014) and California Native Plant Society (CNPS; 2014) online database for information regarding sensitive species known to occur within the Project vicinity.

1.3.2 General Biological Survey

On January 2, 2014, HELIX biologists Stacy Nigro and George Aldridge mapped vegetation and conducted general botanical and zoological surveys (Table 1). Vegetation communities within the Project site and 100 feet off site were mapped on a 1"=200' scale aerial photograph of the Project site. Vegetation was classified and mapped according to the County's biological resource mapping requirements (County 2008). Plant identifications were made in the field or later in the laboratory through comparison with photographs or voucher specimens. All animal identifications were made by direct visual observation or indirectly by detection of calls or scat.

DATE	PERSONNEL	SURVEY TYPE
01/02/2014	Stacy Nigro George Aldridge	Vegetation mapping and general botanical and zoological surveys
01/17/2014	Jason Kurnow	Preliminary burrowing owl survey
04/07/2014	Jason Kurnow	Coastal California gnatcatcher #1/3
04/08/2014	Jason Kurnow	Burrowing owl #1/4
04/14/2014	Jason Kurnow	Coastal California gnatcatcher #2/3
04/14/2014	Stacy Nigro Jason Kurnow	Jurisdictional Delineation

**Table 1 (cont.)
SURVEY INFORMATION**

DATE	PERSONNEL	SURVEY TYPE
04/25/2014	Jason Kurnow	Coastal California gnatcatcher #3/3
04/28/2014	Amy Mattson Laura Moreton	Rare Plants #1/2
05/01/2014	Jason Kurnow	Burrowing owl #2/4
05/13/2014	Amy Mattson Laura Moreton	Rare Plants #2/2
05/22/2014	Jason Kurnow Laura Moreton	Burrowing Owl #3/4
06/16/2014	Jason Kurnow Laura Moreton Jenna Hartsook	Burrowing Owl #4/4
05/19/2014	Jasmine Bakker Laura Moreton	Hermes Copper Butterfly #1/4
06/02/2014	Jasmine Bakker Laura Moreton	Hermes Copper Butterfly #2/4
06/17/2014	Jasmine Bakker Laura Moreton	Hermes Copper Butterfly #3/4
07/07/2014	Stacy Nigro	Hermes Copper Butterfly #4/4
02/18/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #1/15
02/26/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #2/15
03/05/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #3/15
03/10/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #4/15
03/19/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #5/15
03/25/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #6/15
03/31/2015	Jane Higginson	Quino Checkerspot Butterfly #7/15
04/01/2015	Jane Higginson	Quino Checkerspot Butterfly #8/15
04/02/2015	Jane Higginson	Quino Checkerspot Butterfly #9/15
04/08/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #10/15
04/14/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #11/15
04/26/2015	Ben Rosenbaum	General Biological Survey, Wildlife Corridor Assessment
04/28/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #12/15
04/30/2015	Karl Osmundson	Jurisdictional Delineation, Wildlife Corridor Assessment
05/04/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #13/15

Table 1 (cont.) SURVEY INFORMATION		
DATE	PERSONNEL	SURVEY TYPE
05/05/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #14/15
05/06/2015	Amy Mattson Andrew Pignuolo	Quino Checkerspot Butterfly #15/15

1.3.3 Focused Surveys

Burrowing Owl

A preliminary survey for burrowing owl (*Athene cunicularia*) and assessment of potential burrowing owl habitat was performed on January 17, 2014 by HELIX biologist Jason Kurnow. Protocol burrowing owl surveys were conducted by HELIX on April 8, May 1, May 22, and June 16, 2014 in accordance with California Department of Fish and Wildlife guidelines (CDFW 2012).

Coastal California Gnatcatcher

Protocol-level focused surveys for coastal California gnatcatcher (*Polioptila californica californica*) were performed in April 2014. Surveys were performed according to U.S. Fish and Wildlife Service (USFWS) protocol by HELIX Biologist Jason Kurnow (Permit #TE 778195).

Hermes Copper

Protocol-level focused surveys for Hermes copper (*Lycaena hermes*) were conducted in May, June, and July 2014 in accordance with protocol recommended by the County.

Quino Checkerspot

Protocol-level focused surveys for Quino checkerspot butterfly (*Euphydryas editha quino*) were conducted by HELIX (Permit #TE778195-12) and Laguna Mountain Environmental, Inc. (TE-053020-2) February through May 2015 in accordance with required protocol (USFWS 2014).

Rare Plants

An initial rare plant survey was conducted on April 28, 2014. An additional survey was conducted on May 13, 2014. Inspections for rare plants were performed concurrent with other surveys in 2014 and 2015. Several non-listed, rare plants were confirmed to be present within portions of the site.

1.3.4 Jurisdictional Delineation

USACE Jurisdictional Areas

U.S. Army Corps of Engineers (USACE) wetland boundaries were determined using three criteria (vegetation, hydrology, and soils) established for wetland delineations, as described within the Wetlands Delineation Manual (Environmental Laboratory 1987) and Arid West Regional Supplement (USACE 2006). Other references included memoranda (USACE and Environmental Protection Agency [EPA] 2007; Grumbles and Woodley 2007) that helped clarify the wetland manual and recent court decisions.

All potential wetlands areas were surveyed. If an area was suspected of being a wetland, vegetation and hydrology indicators were noted and soil was sampled and described. The area was then determined to be a federal (USACE) wetland if it satisfied all 3 wetland criteria.

Areas were determined to be non-wetland Waters of the U.S. (WUS) if there was evidence of regular surface flow (e.g., bed and bank) but neither vegetation nor soils criterion was met. Jurisdictional limits for these areas were defined by the ordinary high water mark (OHWM), which is defined in 33 CFR Section 329.11 as “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank; shelving; changes in the character of the soil; destruction of terrestrial vegetation; the presence of litter or debris; or other appropriate means that consider the characteristics of the surrounding areas.” The USACE has issued further guidance on the OHWM (Riley 2005), which was also used for the delineation.

CDFW Jurisdictional Areas

California Department of Fish and Wildlife (CDFW) jurisdictional boundaries were determined based on the presence of riparian vegetation or regular surface flow. Streambeds within CDFW jurisdiction were delineated based on the definition of streambed as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports riparian vegetation” (Title 14, Section 1.72). This definition for CDFW jurisdictional habitat allows for a wide variety of habitat types to be jurisdictional, including some that do not include wetland species (e.g., oak woodland and alluvial fan sage scrub). The CDFW jurisdictional habitat includes all riparian shrub or tree canopy that may extend beyond the banks of a stream.

County Resource Protection Ordinance Wetlands

Areas were considered County wetlands if they met one of the three following attributes pursuant to the Resource Protection Ordinance ([RPO] County 1991): (1) at least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) the substratum is predominantly undrained hydric soil; or (3) 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.

1.3.5 Nomenclature

Nomenclature used in this report comes from Holland (1986) and Oberbauer (2005) for vegetation communities; Baldwin *et al.* (2012) for plants; Emmel and Emmel (1973) for butterflies; Collins and Taggart (2002) for amphibians and reptiles; and American Ornithologists' Union (2014) for birds. Plant species status is taken from the CNPS (2014), and animal species status is taken from the CDFW CNDDDB (2014). Sensitive plant species' habitat information is from Reiser (2001).

1.4 ENVIRONMENTAL SETTING

The site is primarily covered by non-native annual grasses in the west and native coastal sage scrub in the east. Natural features within the vicinity of the Project site include the San Diego National Wildlife Refuge to the north and west. Surrounding land uses consist of rural residential development in the community of Jamul. The site is bounded on 3 sides by paved roads, and sits in the center of Jamul at the intersection of SR 94 and Jefferson Road. Many trails and dirt roads traverse the site, and there is evidence of off-road vehicles, dirt bikes, bicycles, equestrians, and joggers currently using the site.

The site slopes generally west and south, from a high point of 1,167 feet (ft) above mean sea level (amsl) in the northeast to a low point of 957 ft amsl in the northwest and elevations around 1,000 ft amsl in the southwest. The Project site is mapped as including 8 soil mapping units belonging to 4 soil series (U.S. Department of Agriculture [USDA] 2014): Cieneba coarse sandy loam, 15 to 30 percent slopes; Cieneba rocky coarse sandy loam, 9 to 30 percent slopes; Fallbrook sandy loam, 5 to 9 percent slopes; Fallbrook sandy loam, 9 to 15 percent slopes; Fallbrook sandy loam, 15 to 30 percent slopes; Fallbrook rocky sandy loam, 9 to 30 percent slopes; Placentia sandy loam, 5 to 9 percent slopes; and Ramona sandy loam, 5 to 9 percent slopes (Figure 6). Approximately 98 percent of the soils on the site are in the Fallbrook or Ramona series, which are soils derived from granite or granodiorite parent materials, with moderate to very high water capacity and no ponding frequency (USDA 2014).

1.4.1 Regional Context

As stated above, the South County MSCP designation for the site is Unincorporated Land outside the PAMA. The site supports extensive undisturbed native coastal sage scrub vegetation in the eastern half and mostly former agricultural lands in the western half.

1.4.2 Habitat Types/Vegetation Communities

Nine vegetation communities occur on site: Baccharis scrub (BS), southern willow scrub (SWS), coast live oak woodland (CLOW), Diegan coastal sage scrub (DCSS), Engelmann oak woodland (EOW), eucalyptus woodland (EW), non-native grassland (NNG), non-native vegetation (NNV), and southern coast live oak riparian forest (SCLORF). Disturbed habitat (DH), and developed land (DEV) also occur on the site (Figure 7; Table 2). Additional SCLORF and DEV occur within the off-site area planned for required roadway and storm drain improvements. Representative photographs are provided in Appendix E.

Table 2 EXISTING VEGETATION COMMUNITIES/HABITATS		
VEGETATION COMMUNITY/HABITAT*	PROJECT SITE ACRE(S)	OFF SITE ACRE(S)
Tier I		
Southern willow scrub (63320)	0.02	-
Southern coast live oak riparian forest (61310)	0.17	0.07
Engelmann oak woodland (71180)	0.74	-
Coast live oak woodland (71160)	0.08	-
Tier II		
Baccharis scrub (32530)	4.95	-
Diegan coastal sage scrub (32500)	93.14	-
Tier III		
Non-native grassland (42200)	52.43	-
Tier IV		
Eucalyptus woodland (79100)	0.12	-
Non-native vegetation (11000)	1.54	-
Disturbed habitat (11300)	4.44	-
Developed (12000)	4.37	<0.1 (0.02)
TOTAL	162.00	0.09

*Vegetation categories and numerical codes are from Oberbauer (2005)

Southern Willow Scrub

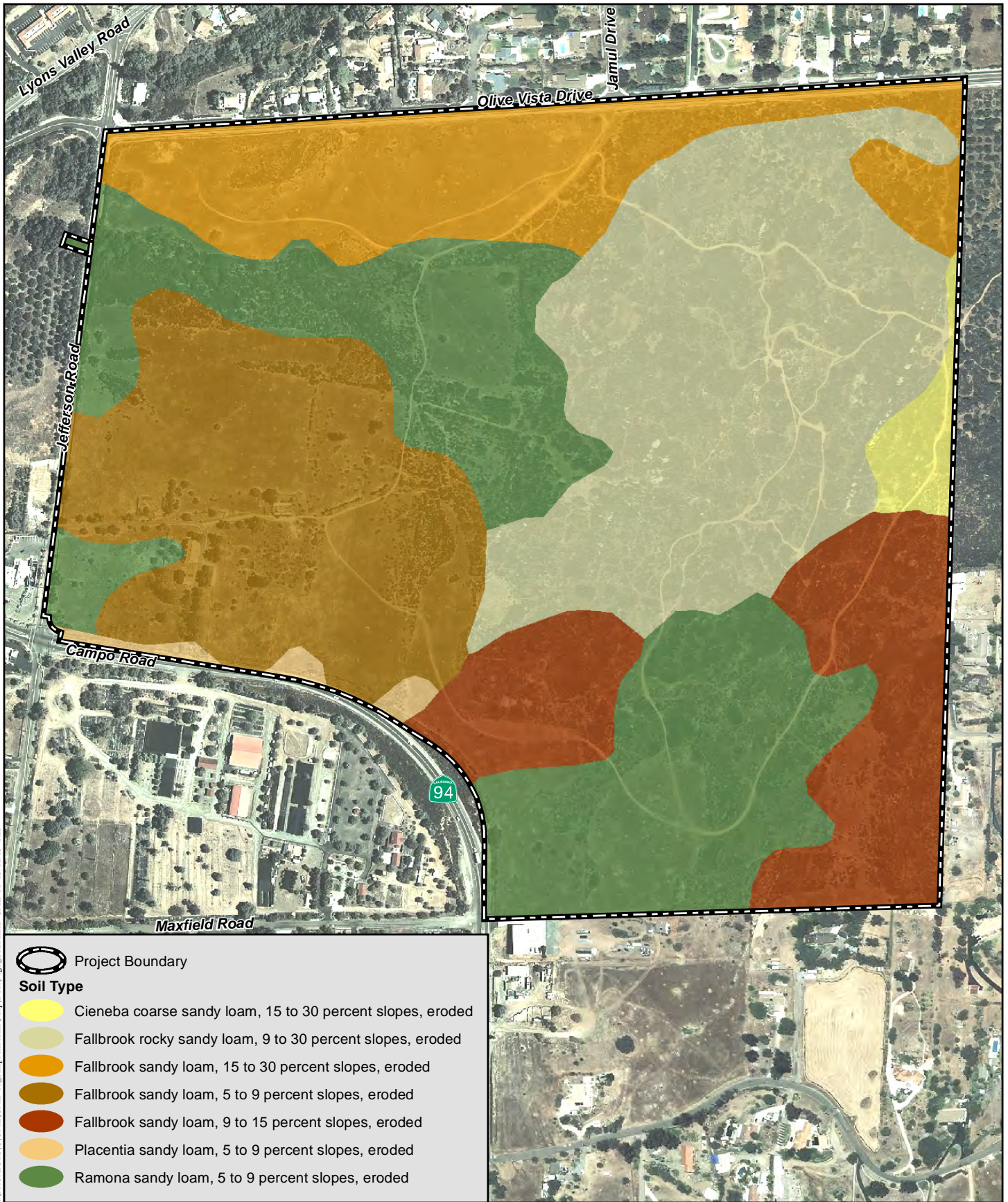
Southern willow scrub is a dense, broadleaf, deciduous thicket dominated by willow species (*Salix* spp.) with little understory. Scattered emergent western sycamore (*Platanus racemosa*) and cottonwood (*Populus fremontii*) may also be present. Southern willow scrub typically occurs in loose, sandy or gravelly alluvium near stream channels and succeeds to southern cottonwood-sycamore riparian forest without periodic disturbance by flooding. Southern willow scrub on the Project site occurs along a drainage in the northwest corner, and covers 0.02 acre.

Southern Coast Live Oak Riparian Forest

Southern coast live oak riparian forest is an open, to locally dense, evergreen, riparian woodland that is dominated by coast live oak (*Quercus agrifolia*), with a sub-dominance of willow (*Salix* spp.). This community is richer in herbs and poorer in understory shrubs than other riparian communities. Southern coast live oak riparian forest occurs within the upper banks of an ephemeral drainage in the northwest of the Project site, and includes arroyo willow (*Salix lasiolepis*), olive (*Olea europaea*), and bridal creeper (*Asparagus asparagoides*). Approximately 0.17 acre of southern coast live oak riparian forest occurs in the Project site.

Engelmann Oak Woodland

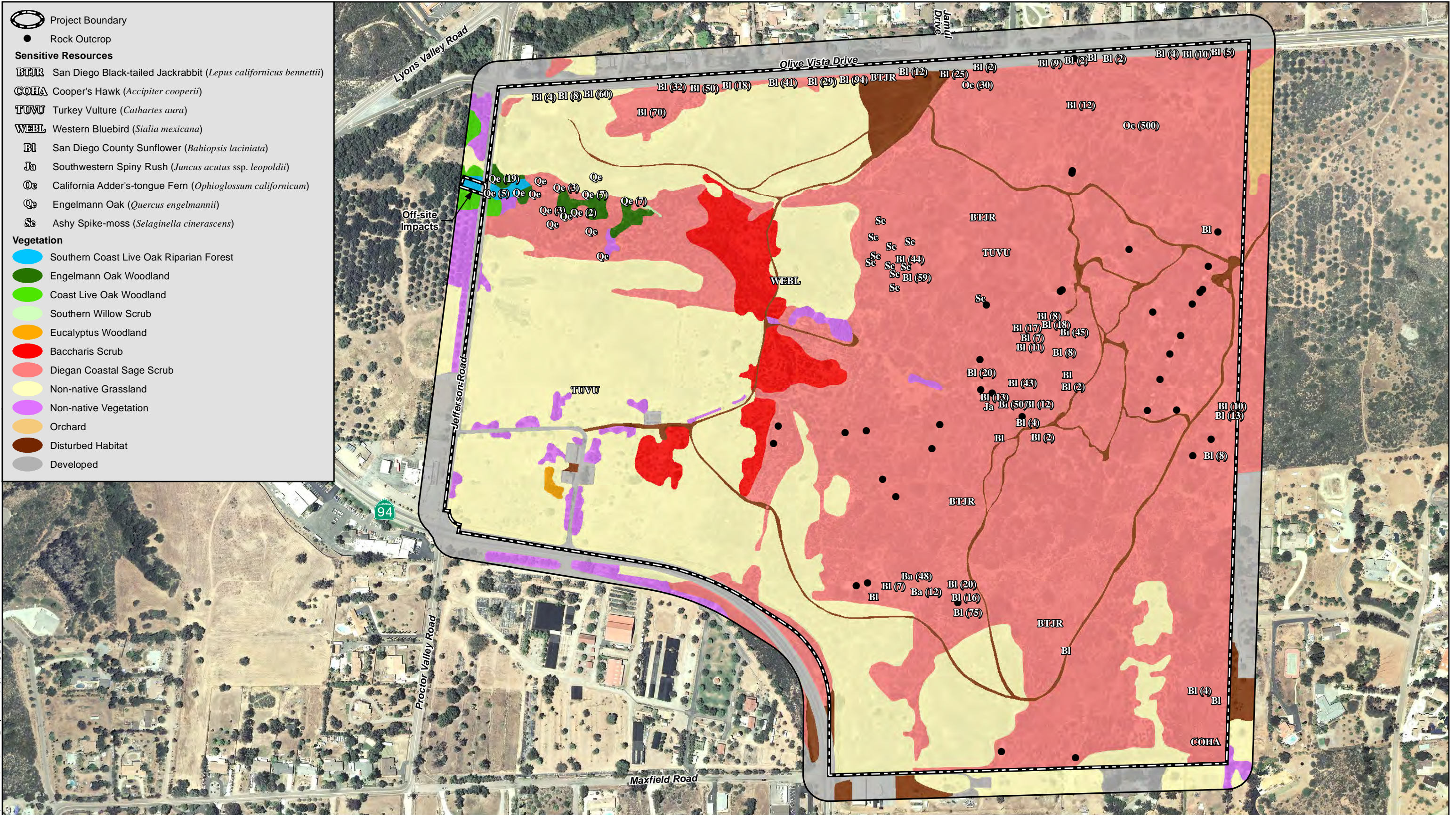
Engelmann oak woodland occurs in relatively moist sites on fine-textured soils of gentle slopes and valley bottoms. This community is dominated by Engelmann oaks (*Quercus engelmannii*) in association with coast live oak. Annual grasses dominate the understory. Open Englemann oak



Soils Map

SIMPSON FARMS

Figure 6



Vegetation/Sensitive Resources

SIMPSON FARMS

woodland intergrades with coastal sage scrub on drier rockier sites and with a denser mix of Engelmann oak and coast live oak on more mesic sites. Engelmann oak woodland on the Project site occurs within upland landscape positions and in association with other upland plant species, outside of and beyond the upper limits of one of several upland, ephemeral drainage features on the site. Where the community occurs on site, it is open and primarily intergrades with coastal sage scrub. As such, it functions as an upland oak woodland community and not as a riparian community. Dominant species include Engelmann oak, San Diego honeysuckle (*Lonicera subspicata* var. *denudata*), poison oak (*Toxicodendron diversilobum*), and California sagebrush (*Artemisia californica*). No willow species or other species that typically serve as dominant or sub-dominant species in riparian communities occur in association with the Engelmann oak woodland on site. Engelmann oak woodland covers 0.74 acre in the northwest portion of the Project site.

Coast Live Oak Woodland

Coast live oak woodland is an open to dense evergreen woodland or forest community, dominated by coast live oak that may reach a height of 35-80 ft. The shrub layer consists of toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), spreading snowberry (*Symphoricarpos mollis*), fuchsia-flowered gooseberry (*Ribes speciosum*), and poison oak. A dense herbaceous understory is dominated by miner's lettuce (*Claytonia perfoliata* var. *perfoliata*) and chickweed (*Stellaria media*). This community occurs along the coastal foothills of the Peninsular Ranges; typically, on north-facing slopes and shaded ravines (Holland 1986). Coast live oak woodland on the Project site occurs in the northwest and consists of a dense canopy of coast live oak, with no understory, covering approximately 0.08 acre.

Baccharis Scrub

Baccharis scrub is typically found on disturbed sites, nutrient-poor soils, or upper terraces of river valleys. It is dominated by broom baccharis (*Baccharis sarothroides*) and/or coyote brush (*Baccharis pilularis*), and might also include goldenbush (*Isocoma menziesii*), California sagebrush, and California buckwheat (*Eriogonum fasciculatum*) in lesser amounts. Baccharis scrub on the Project site is dominated by broom baccharis, and includes black elderberry (*Sambucus nigra* ssp. *canadensis*), Peruvian pepper tree (*Schinus molle*), and laurel sumac (*Malosma laurina*) as isolated individuals. This community occurs near the center of the Project area, at the edges of former agricultural areas and native coastal sage scrub, and covers 4.95 acres.

Diegan Coastal Sage Scrub

Diegan coastal sage scrub (DCSS) is one of the major shrub communities in southern California that occupies xeric sites with shallow soils. Dominated by drought-deciduous shrubs with shallow root systems and open canopies, coastal sage scrub communities often contain a substantial herbaceous component. DCSS occurs in coastal southern California from Los Angeles County into northwestern Baja California, Mexico (Baja; Holland 1986), where it supports a number of threatened, endangered, and rare vascular plants, as well as several bird and reptile species that are candidates for federal listing.

The Project site supports 93.14 acres of DCSS, which occurs in the eastern and half of the site. Dominant plant species within this vegetation community include California sagebrush, California buckwheat, white sage (*Salvia apiana*), mission manzanita (*Xylococcus bicolor*), and toyon (*Heteromeles arbutifolia*).

Non-native Grassland

Non-native grassland is a dense to sparse cover of annual grasses, often associated with native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Most of the annual introduced species that compose NNG originated in the Mediterranean region of Europe, an area with a climate similar to that in California and a long history of agriculture. These two factors have contributed to the successful invasion and establishment of these species and the replacement of native perennial grasslands with annual non-native grassland (Jackson 1985).

Non-native grassland occurs over much of the western half of the Project site, in former agricultural areas. The dominant species in non-native grassland on the Project site are soft chess (*Bromus hordeaceus*), foxtail chess (*Bromus madritensis*), black mustard (*Brassica nigra*), Italian thistle (*Carduus pycnocephalus*), long-stem filaree (*Erodium botrys*). This vegetation type covers 52.43 acres of the Project site.

Eucalyptus Woodland

Eucalyptus woodland is a dense to sparse canopy of non-native gum trees (*Eucalyptus* spp.), with shrubby and herbaceous understory ranging from almost non-existent to moderately dense. Native species can be present in the understory, but only where the gum tree canopy is not closed. A 0.12-acre patch of eucalyptus woodland occurs on the Project site south and west of the existing house.

Non-native Vegetation

Non-native vegetation is dominated by escaped ornamentals and naturalized introduced species, often in a monoculture. Non-native vegetation on the site consists of patches of non-native trees such as olive (*Olea europaea*), Peruvian pepper (*Schinus molle*), tree tobacco (*Nicotiana glauca*), and Mexican fan palm (*Washingtonia robusta*), mostly along roads in the southwest corner. Approximately 1.54 acres of non-native vegetation occurs on site.

Disturbed Habitat

Disturbed habitat is highly disturbed land that retains a soil substrate. If it is vegetated, it supports an assemblage of almost exclusively non-native, weedy, upland species that colonize after human disturbance. There is no recognizable native or naturalized vegetation association, and characteristic species vary considerably depending on local colonization potential. The area mapped as disturbed habitat on the Project site is used for dirt-bike activity and includes extensive trails and constructed jumps and moguls. This area is mostly un-vegetated, and supports only long-beak filaree (*Erodium botrys*) in spaces not recently disturbed by dirt-bikes. This area covers 4.44 acres.

Developed Land

Developed land exists where permanent structures and/or pavement have been placed (preventing the growth of vegetation) or where landscaping is clearly tended and maintained. Approximately 4.37 acres of developed land occurs within the Project site and consists of the existing house and barn, driveways, and an abandoned house site in the southwest corner, and a landscaped slope on the south side of Olive Vista Drive.

1.4.3 Flora

A total of 109 plant species were observed on the Project site during surveys, of which 38 are non-native (Appendix A).

1.4.4 Fauna

A total of 66 animal species were recorded on the Project site during surveys, including 29 butterflies, 32 bird, and 5 mammal species (Appendix B).

1.4.5 Sensitive Plant Species

Three sensitive plant species (Engelmann oak [*Quercus engelmannii*]; spiny rush [*Juncus acutus ssp. leopoldii*]; San Diego sunflower [*Bahiopsis laciniata*]) were observed on the Project site (Figure 7) and are discussed below. The potential for sensitive plant species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions (Appendix C). Listing codes are explained in Appendix F.

San Diego sunflower (*Bahiopsis laciniata*)

Listing: --/--; CNPS List 4.2; County Group D

Distribution: San Diego and Orange County; Baja California, Mexico

Habitat: Diegan coastal sage scrub. Generally, shrub cover is more open than at mesic, coastal locales supporting sage scrub. Occurs on a variety of soil types.

Status on site: Approximately 1,096 individuals were observed throughout the DCSS on the Project site, including many that appeared to be planted in order to revegetate a slope along Olive Vista Drive.

Spiny rush (*Juncus acutus ssp. leopoldii*)

Listing: --/--; CNPS List 4.2; County Group D

Distribution: Central to southern California and Arizona. Confined to western North America.

Habitat: Coastal strand and wetland-riparian. Common in wet alkaline places, coastal marshes, river valleys, occasionally by desert creeks, less than 3,000 ft.

Status on site: An isolated individual was observed at a single location in association with an ephemeral drainage in the central portion of the site.

Engelmann oak (*Quercus engelmannii*)

Listing: --/--; CNPS List 4.2; County Group D

Distribution: Cismontane foothills of southern California (primarily from the Santa Ana Mountains to Baja California, Mexico) within an upper elevation limit of approximately 4,200 ft

Habitat: Oak woodland and southern mixed chaparral. Larger oaks sometimes occurs in vast savannah grasslands. In foothills, may also occur as a shrubby element within the chaparral.
Status on site: Occurs in the northwest of the Project site in an open Engelmann oak woodland intergrading with DCSS and along the margin of southern coast live oak riparian forest. Approximately 52 individuals were identified in these areas.

California adder's-tongue (*Ophioglossum californicum*)

Listing: --/--; CNPS List 4.2; County Group D

Distribution: Discontinuous distribution from central California to San Diego County and northern Baja California, Mexico

Habitat: Grassy, open areas where it is generally associated with short grasses and other herbs. Although often found near vernal pools, can also occur in relatively dry, stony areas.

Status on site: Occurs in the northeast of the Project site in DCSS. Approximately 530 individuals were identified in this area.

Ashy spike-moss (*Selaginella cinerascens*)

Listing: --/--; CNPS List 4.1; County Group D

Distribution: Orange and San Diego counties; northwestern Baja California, Mexico

Habitat: Flat mesas in coastal sage scrub and chaparral. A good indicator of site degradation, as it rarely inhabits disturbed soils.

Status on site: Occurs in the north-central portion of the site, mixed with DCSS in two patches, one larger and one smaller.

Sensitive Plant Species with High Potential to Occur

Two sensitive plant species, although not observed during 2014 and 2015 surveys, have a high potential to occur. Species with a high potential to occur are discussed below. The potential for sensitive plant species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions (Appendix C). Listing codes are explained in Appendix F.

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

Listing: --/--; CNPS List 4.2; CA Endemic; County Group D

Distribution: San Diego, Orange, and Riverside counties

Habitat: Coastal mesas and foothills with grassland habitats

Status on site: Suitable habitat occurs on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the non-native grassland on the site.

Rush-like bristleweed (*Xanthisma junceum*)

Listing: --/--; CNPS List 4.3; County Group D

Distribution: San Diego County and Baja California and Sonora, Mexico below approximately 3,000 feet in elevation

Habitat: Xeric, low-growing chamise chaparral or Diegan coastal sage scrub. Usually grows in exposed locations with rocky substrate that does not foster much annual understory. An inconspicuous species that flowers late and is probably under reported.

Status on site: Suitable habitat occurs on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the DCSS on the site.

1.4.6 Sensitive Animal Species

Sensitive Animal Species Observed or Otherwise Detected

Four sensitive animal species (Cooper's hawk [*Accipiter cooperi*]; turkey vulture [*Cathartes aura*]; western bluebird [*Sialia mexicana*]; and San Diego black-tailed jackrabbit [*Lepus californicus bennettii*]), were observed on the Project site (Figure 7) and are discussed below. No federal or state listed animal species were observed or detected on site.

Cooper's hawk (*Accipiter cooperi*)

Listing: --/WL; County Group 1

Distribution: Throughout the continental U.S., excluding Alaska and parts of both Montana and the Dakotas. Winters south to Mexico and Honduras.

Habitat: In San Diego County, tends to inhabit lowland riparian areas and oak woodlands in proximity to suitable foraging areas, such as scrublands or fields.

Status on site: One individual observed flying over the southeast corner of the Project site on January 17, 2014.

Turkey vulture (*Cathartes aura*)

Status: --/--; County Group 1

Distribution: Observed throughout San Diego County with the exception of extreme coastal San Diego where development is heaviest

Habitat(s): Foraging habitat includes most open habitats with breeding occurring in crevices among boulders

Status on site: This species was observed soaring over the Project site on several occasions during the 2014 and 2015 surveys.

Western bluebird (*Sialia Mexicana*)

Status: --/--; County Group 2

Distribution: Year round in south-west North America.

Habitat(s): Open coniferous and deciduous woodlands, wooded riparian areas, grasslands, farmlands, and edge of burned areas. Prefers open forest habitats. Nests in cavities of trees and snags, or between bark and trunk. Uses nest boxes.

Status on site: This species was observed foraging over the central portion of the site during a single survey in 2014.

San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)

Status: --/SSC; County Group 2

Distribution: Greater part of western North America from southern Washington, South Dakota, and Montana to Texas, northern Mexico and Baja California. Introduced to Florida and parts of Northeastern United States.

Habitat(s): Primarily in open habitats including coastal sage scrub, chaparral, grasslands, croplands, and open, disturbed areas if there is at least some shrub cover present.

Status on site: This species was observed or detected by sign at several locations throughout the site during 2014 and 2015 surveys.

Sensitive Animal Species with High Potential to Occur

Several sensitive animal species, although not observed during 2014 and 2015 surveys, have a high potential to occur. Species with a high potential to occur are discussed below. The potential for sensitive animal species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions (Appendix D). Listing codes are explained in Appendix F.

Coast patch-nosed snake (*Salvadora hexalepis virgulata*)

Status: --/SSC; County Group 2

Distribution: Occurs in California from the northern Carrizo Plains in San Luis Obispo County, south through the coastal zone, south and west of the deserts, into coastal northern Baja California.

Habitat(s): Semi-arid brushy areas and chaparral in canyons, rocky hillsides, and plains.

Potential to occur: Suitable brushy habitat, rocky hillsides, and prey base occurs on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the coastal sage scrub on site.

Coastal rosy boa (*Lichanura trivirgata roseofusca*)

Status: --/--; County Group 2

Distribution: Occurs throughout San Diego county, and up through parts of Riverside, San Bernardino, and L.A. counties.

Habitat(s): Rocky outcrops in coastal sage scrub, chaparral, and desert scrub.

Potential to occur: Suitable habitat and prey occur on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the coastal sage scrub on the site.

Coastal western whiptail (*Aspidoscelis tigris multiscutatus*)

Status: --/SSC; County Group 2

Distribution: Occurs along coastal southern California and Baja California, Mexico.

Habitat: Deserts and semiarid areas with sparse vegetation and open areas, and in woodland and riparian areas. Substrate may be firm soil, sandy, or rocky at surface.

Potential to occur: Suitable open habitat occurs on the site for this species. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the coastal sage scrub on the site.

Coronado skink (*Eumeces skiltonianus interparietalis*)

Status: --/SSC; County Group 2

Distribution: Occurs throughout San Diego county and northern Baja California, Mexico.

Habitat: Grassland, chaparral, pinyon-juniper and juniper sage woodland, and pine-oak and pine forests.

Potential to occur: Suitable grassland, woodland and forest habitat occurs for this species. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy the densely-vegetated portions of the site.

Northern red diamond rattlesnake (*Crotalus ruber ruber*)

Status: --/SSC; County Group 2

Distribution: Occurs in southwestern California and Baja California, Mexico.

Habitat: Chaparral, coastal sage scrub, along creek banks, particularly among rock outcrops or piles of debris with a supply of burrowing rodents for prey.

Potential to occur: Suitable habitat and prey occur on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the coastal sage scrub on the site.

Orange-throated whiptail (*Aspidoscelis hyperythrus*)

Status: --/SSC; County Group 2

Distribution: Occurs throughout southern California, Baja California and Baja California Sur, Mexico.

Habitat: Coastal scrub, chaparral, and valley and foothill hardwood habitats. Prefers washes and sandy areas with patches of brush and rocks. Perennial plants required to support its primary prey termites.

Potential to occur: Suitable habitat occurs on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to occupy portions of the coastal sage scrub on the site.

Grasshopper sparrow (*Ammodramus savannarum*)

Status: --/SSC; County Group 1

Distribution: Can be found throughout the United States during the summer, including San Diego county and western California. Winters in far south United States and throughout Mexico.

Habitat: Grasslands.

Potential to occur: Suitable grassland habitat occurs on the site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to nest and migrate through the grassland on the site.

Red-shouldered hawk (*Buteo lineatus*)

Status: --/--; County Group 1

Distribution: Occurs throughout western California and down through Baja California, Mexico. Found throughout eastern United States.

Habitat: Riparian woodland, oak woodland, orchards, eucalyptus groves, or other areas with tall trees.

Potential to occur: Suitable eucalyptus and oak woodland habitats occur on the site. Prey including small mammals and reptiles are available on site. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to nest and forage over portions of the woodland that occurs on the site.

Rufous-crowned sparrow (*Aimophila ruficeps canescens*)

Status: --/--; County Group 1

Distribution: Occurs throughout southwest North America, including San Diego county and coastal California.

Habitat: Found in coastal sage scrub and sparse mixed chaparral.

Potential to occur: Suitable coastal sage scrub habitat occurs on the site allowing for a high potential to nest. Suitable grassland provides appropriate grass and forb seeds for foraging. Although not observed or otherwise detected during 2014 and 2015 surveys, this species has a high potential to nest and forage over the coastal sage scrub and grassland on the site.

Sensitive Animal Species Demonstrated through Protocol-Level Surveys to be Absent

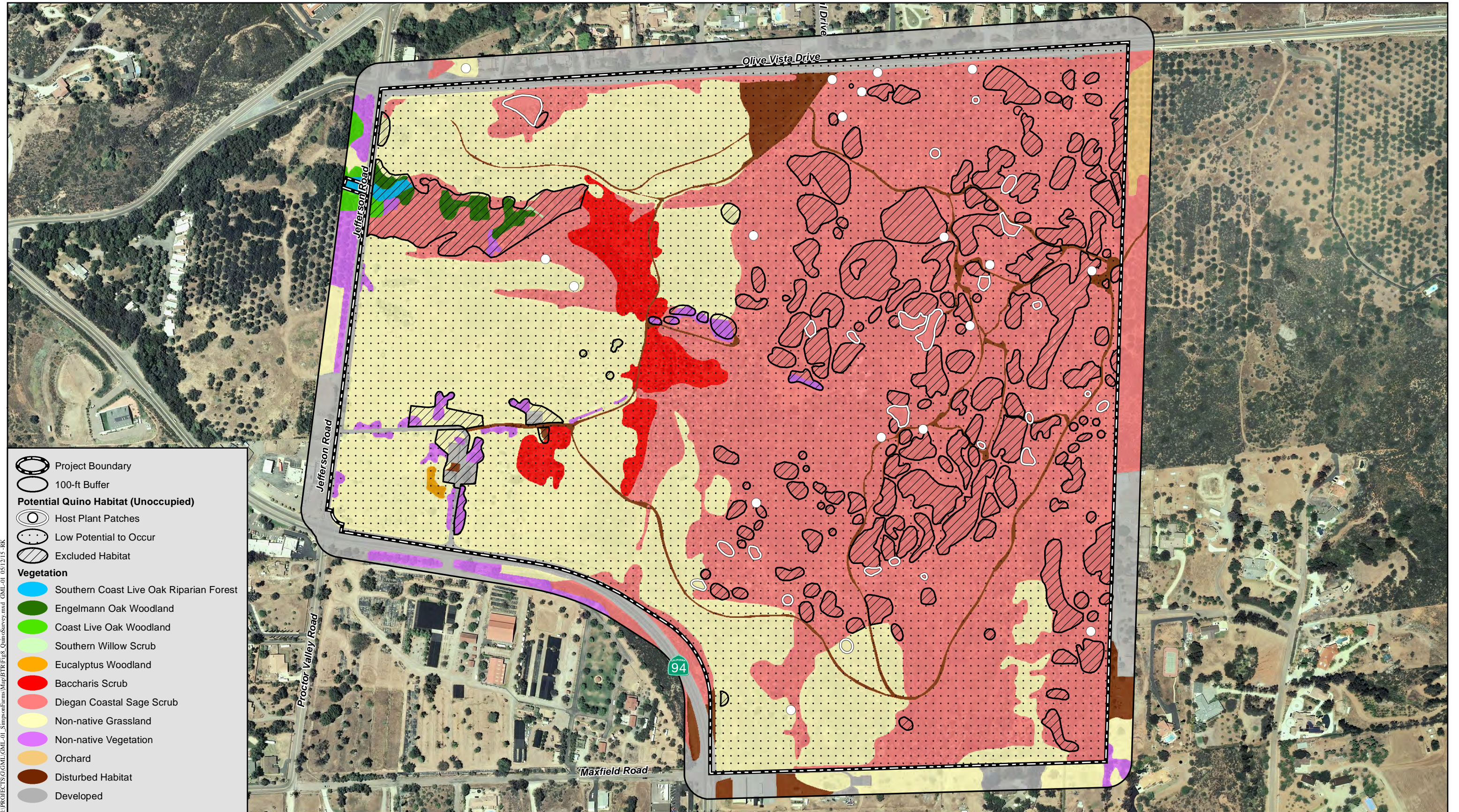
Protocol-level surveys were completed in 2014 and 2015 for the following sensitive animal species: Quino checkerspot butterfly, Hermes copper butterfly, coastal California gnatcatcher, and burrowing owl. None of these species were observed or otherwise detected on the site during protocol surveys, as discussed in further detail below.

Quino Checkerspot Butterfly

The Project site occurs within the recommended survey area for Quino checkerspot butterfly. An initial site assessment for Quino was conducted by HELIX biologist Amy Mattson (TE778195-12) and Laguna Mountain Environmental, Inc. biologist Andrew Pigniolo (TE053020-2) on February 18, 2015. The site assessment confirmed the presence of potential habitat for Quino warranting further evaluation and surveys. HELIX biologist Amy Mattson and Laguna Mountain Environmental, Inc. biologists Andrew Pigniolo and Jane Higginson completed focused surveys for Quino from February to May 2015. A total of 15 site visits were conducted in accordance with USFWS protocol (2014). The results of the survey are depicted on Figure 8.

The surveys included an intensive inspection for the presence or absence of Quino checkerspot butterfly and an evaluation of the site's overall suitability for the species, including assessment and inventory of host plant patches, nectar sources, and overall quality of the habitat. The initial Quino habitat assessment surveys determined that approximately 132 acres of the site was considered potential QCB habitat based on the current USFWS Survey Guidelines (USFWS 2014). Approximately 27.1 acres were excluded from the Quino survey area based on the presence of dense, closed-canopy scrub, closed-canopy trees, and developed land. Coastal sage scrub characterized by overlapping shrubs, or near overlapping shrubs, and representing a closed-canopy prohibiting clear access to the ground by butterflies were excluded.

No Quino were observed or otherwise detected and the species is currently presumed to be absent from the site. At the conclusion of the surveys, the overall quality of the habitat was determined to be low. Although smaller patches of primary host plant species (*Plantago erecta*) and rare secondary host plant species (*Castilleja exserta*) occur, overall vegetative cover is dense and the site's topography is relatively flat compared to optimal Quino sites. The on-site coastal sage scrub is relatively dense in areas that have not been fragmented by trails. Where there are breaks in the canopy, the areas are predominately composed of non-native grasses and rock outcrops. The topography of the site is flat and shallow-sloping, and is not characterized by prominent hilltop features typically associated with occupied Quino habitat. Although smaller rises in the land occur on the site, these rises are at much lower elevations than the hilltop features that occur at off-site locations in local and regional area. The known Quino records in the surrounding area are in association with higher elevations with large contiguous blocks of habitat and more prominent hilltop features, such as McGinty Mountain and Jamul Mountains.



Quino Survey Results

SIMPSON FARMS

Figure 8

The closest reported occurrences are 1.5 miles to the northwest and southeast of the site. Both records are associated with more prominent ridgeline and hilltop features in the local area, which are not characteristic of the site. The likelihood for Quino to occupy the Project site in subsequent years is low considering the overall quality of the on-site habitat, landscape setting of the site, and location of known Quino sites and distribution in the local and regional area.

Hermes Copper Butterfly

The Project site occurs within the known range for Hermes copper and there are historic records from several locations in the area, with the closest observations located less than one mile to the north, less than a mile to the south, and just over one mile to the east of the site. An initial site assessment for Hermes was conducted by HELIX biologist Amy Mattson (TE778195-12) on April 28, 2014. The site assessment confirmed the presence of potential habitat for Hermes warranting further evaluation and surveys. HELIX biologists Jasmine Bakker (TE778195-12) and Laura Moreton completed focused surveys for Hermes from May to July 2014. A total of four site visits were conducted in accordance with County guidelines. The results of the survey are depicted on Figure 9.

Host plants (*Rhamnus crocea*) in association with nectar plants (*Eriogonum fasciculatum*) were identified in multiple locations onsite. No Hermes copper were observed or otherwise detected during the survey effort. Surveys were negative and the site is not considered to be occupied by Hermes copper.

Hermes copper is a sedentary species that remains close to host plants. They are able to travel distances greater than 3,500 feet, but long movement over vegetation communities other than coastal sage scrub are reported to be rare. The likelihood for Hermes to occupy the site in subsequent years is considered low based on the site's isolation from better quality habitat in the local area and the species' sedentary nature and relatively poor dispersing ability. However, according to the County guidelines, the site is considered potential habitat for Hermes copper, based on the presence of spiny redberry in close proximity to California buckwheat. County guidelines specify 1:1 mitigation for potential habitat, and the project proposes 1:1 mitigation for the full acreage of coastal sage scrub to be impacted, which exceeds the potential Hermes acreage.

Coastal California Gnatcatcher

The Project site occurs within the known range for gnatcatcher. There is one CNDDDB record of gnatcatcher on the site from 1999. Protocol surveys in 2006 were negative (Dudek 2006). HELIX biologist Jason Kurnow (TE778195-12) completed focused surveys for gnatcatcher in April 2014. A total of three site visits were conducted in accordance with USFWS protocol. Surveys were negative and gnatcatcher is currently presumed to be absent from the site. This species could disperse through the site and potentially occupy the site in subsequent years based on the presence of suitable habitat.

Burrowing Owl

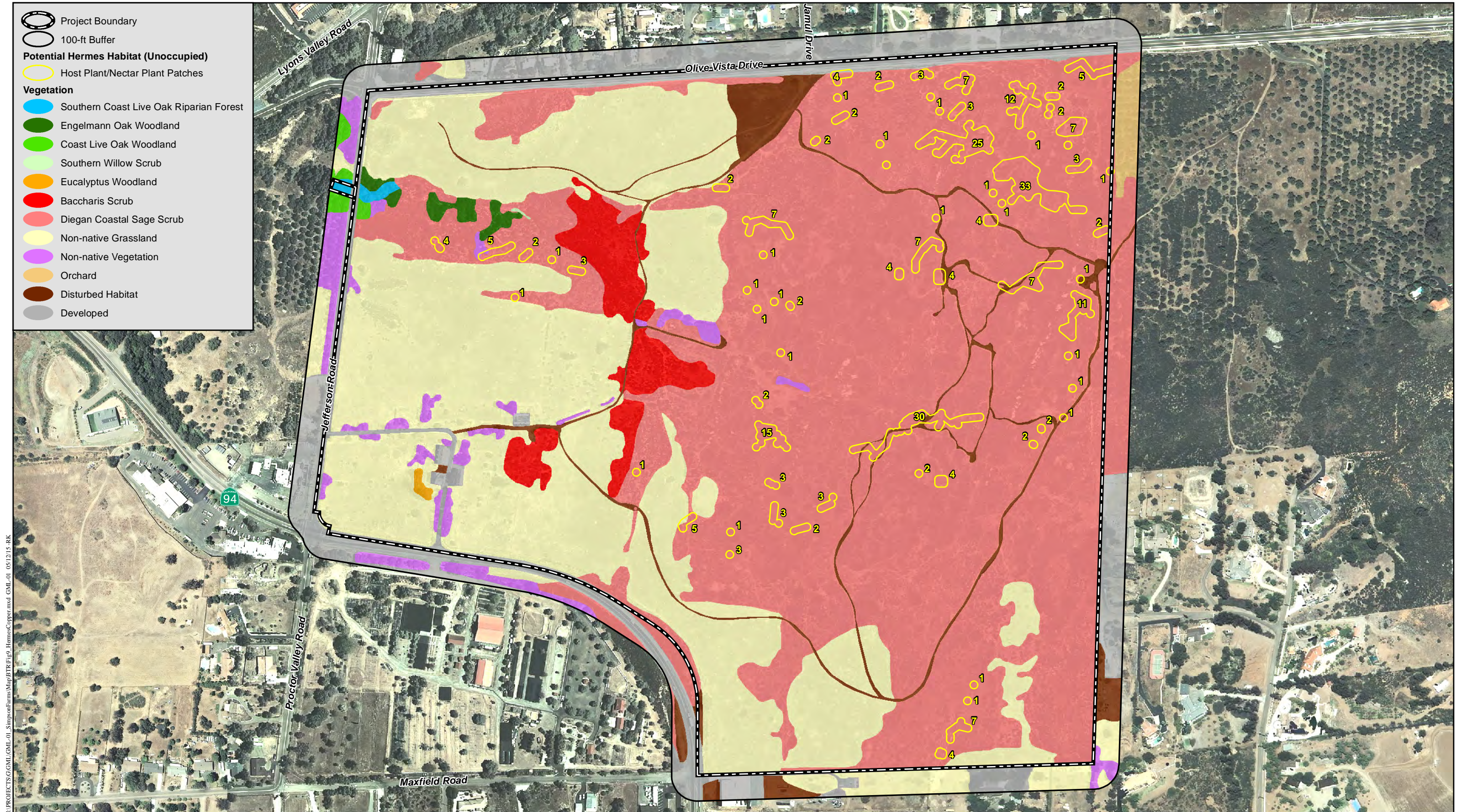
The Project site occurs within the known range for burrowing owl. No burrowing owl records are reported within 2.0 miles of the site. The nearest recorded burrowing owl observation is

approximately 5.0 miles away to the west near Sweetwater Reservoir. HELIX biologists Jason Kurnow, Laura Moreton, and Jenna Hartsook completed focused surveys for burrowing owl in the spring and summer of 2014. A total of four site visits were conducted in accordance with CDFW 2012 protocol. The biologists surveyed non-native grassland areas for burrowing owls and burrowing owl sign and documented locations of burrow complexes potentially suitable for burrowing owl use. No burrowing owls or burrowing owl sign were observed, although rodent burrows are common throughout non-native grassland areas on the Project site. Surveys were negative and burrowing owl is currently presumed to be absent from the site. This species has a low potential to occupy the site in future years due to the distance to the nearest known location.

1.4.7 Wetlands/Jurisdictional Waters

The Project site includes 4,614 linear feet of non-wetland WUS, ranging from 1 to 3 ft in width (Table 3; Figure 10). An additional 0.01 acre of off-site non-wetland WUS occur on the west side of Jefferson Road. No areas were identified that met all three criteria for USACE wetland. Most of the non-wetland WUS occur in an ephemeral watercourse in the northern half of the Project site. CDFW jurisdictional areas on the Project site include portions of the Engelmann oak woodland that contain trees immediately adjacent to the streambed, in addition to southern coast live oak riparian forest, southern willow scrub, and streambed areas (Table 3; Figure 11). All riparian vegetation on site occurs near the western end of the watercourse in the northwestern corner of the Project site, and totals 0.33 acre. Off-site riparian habitat occurs at the outfall for the culvert beneath Jefferson Road and totals 0.11 acre. CDFW jurisdictional streambed corresponds to USACE non-wetland WUS, but is typically measured from top-of-bank rather than OHWM, resulting in greater widths for CDFW streambed (1 to 6 ft) and thus a larger area. The total CDFW jurisdictional area on the Project site is 0.68 acre and 0.11 acre off site. San Diego County RPO wetlands on the Project site include southern coast live oak riparian forest and southern willow scrub, and total 0.19 acre on site and 0.11 acre off site (Table 3; Figure 12).

Table 3 WETLANDS / JURISDICTIONAL WATERS				
WETLANDS/ JURISDICTIONAL WATERS	PROJECT SITE		OFF SITE	
	Area (ac)	Length (ft)	Area (ac)	Length (ft)
USACE				
Non-wetland WUS	0.22	4,614	0.01	73
TOTAL USACE	0.22	4,614	0.01	73
CDFW				
Engelmann Oak Woodland	0.14	-	-	-
Southern Coast Live Oak Riparian Forest	0.17	-	0.11	-
Southern Willow Scrub	0.02	-	-	-
Streambed	0.35	4,614	-	-
TOTAL CDFW	0.68	4,614	0.11	-
San Diego County RPO				
Southern Coast Live Oak Riparian Forest	0.17	-	0.11	-
Southern Willow Scrub	0.02	-	-	-
TOTAL SAN DIEGO COUNTY RPO	0.19	-	0.11	-



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Hermes Copper Survey Results

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Waters of the U.S.

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- Project Boundary
- 100-ft Buffer
- Culvert
- Streambed
- Southern Coast Live Oak Riparian Forest
- Engelmann Oak Woodland
- Southern Willow Scrub

Waters of the State

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Figure 11



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County of San Diego RPO Wetlands

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1.4.8 Habitat Connectivity and Wildlife Corridors

Wildlife corridors can be local or regional in scale and may function in different ways depending on species and time of year. Local corridors provide animals with access to resources such as food, water, and shelter. Animals can use these corridors to travel from riparian to upland habitats and back. Regional corridors allow for animal movement between large core areas of habitat that are regionally important. They include major creeks and rivers, ridges, valleys, and large swaths of undeveloped land. They provide avenues for wildlife dispersal, for migration and for contact between otherwise distinct populations.

The Project site is not part of a Biological Resource Core Area nor does it function as a regional wildlife corridor. The Project site is in the center of Jamul, which is a rural community in unincorporated San Diego County, east of Mount Miguel and the Jamul mountains, and south of the Sweetwater River Valley, Casa De Oro, and Rancho San Diego. Extensive open space lands associated with the San Diego National Wildlife refuge lie to the west and north; Otay County Open Space Preserve lies to the southwest; and sparse development in Lyons Valley to the east. Jamul itself is rural but developed and does not support open space areas contiguous with surrounding undeveloped lands. Therefore, the Project site is an island of undeveloped land surrounded by rural development and does not provide linkage or wildlife movement corridors between adjacent open space areas.

Figure 13 depicts the expected wildlife movement in the local and regional area. Wildlife movement is expected to occur between undeveloped blocks of habitat located further to the north within the expansive open space surrounding McGinty Mountain; to the south in the expansive open space surrounding Jamul Mountains and Jamul Creek; to the east near Jamul Butte; and to the west out near the Sweetwater River and the San Diego National Wildlife Refuge. Implementation of the proposed Project would not impact local or regional wildlife corridors as the Project site is (1) bounded by SR-94 to the south, Olive Vista Drive to the North, and Jefferson Road to the West, and existing development on all sides; (2) is not adjacent to preserved lands; and (3) the small tributary drainage in the northwest corner of the Project site provides no off-site connection for local corridor movement. As such, the Project site does not contain biological resources that are critical for sensitive species within the Plan Area, and, therefore, does not comprise a substantial wildlife movement corridor.

Last, based on survey findings to date, the Project site does not meet the required criteria to justify Biological Resource Core Area (BRCA) designation, particularly criteria related to habitat connectivity and corridor/linkages. HELIX conducted two wildlife corridor assessment surveys in 2015 to inspect the Project site and local area for indications of wildlife movement and barriers to movement. Most importantly, the site is completely surrounded by chain-link perimeter fencing and has been for some time. This is an obvious physical barrier to movement of small and large mammals. The site does not occur within PAMA, nor is it adjacent or contiguous with PAMA. This suggests that corridor/linkage functions were not identified for the site and surrounding area when the PAMA designations were conceptualized and adopted with the MSCP. The site does not consist of and is not located within a block of habitat greater than 500 acres. The site is relatively flat and does not support topographic features typically associated with corridor/linkage areas, such as major ridgelines, steep gullied land, valley floor, or continuous riparian corridor. A portion of the site is identified as Very High habitat value;

however, the area does not link significant blocks of habitat. A clear, east-west corridor/linkage through the site does not exist. Land to the east is constrained by existing rural residential development. It is unlikely that large mammals would navigate through the network of non-contiguous, linear patches of undeveloped land situated in-between existing developments. In addition to existing rural residential developments, several major roads (Lyons Valley Road and SR-94) occur to the immediate west of the site impeding wildlife movement in the local area. These roads were confirmed by HELIX site visits to lack suitable wildlife undercrossings to accommodate unobstructed movement. Therefore, the Project site does not by itself function as or contribute to a functioning wildlife corridor or linkage.

1.5 APPLICABLE REGULATIONS

Biological resources are subject to regulatory review by the federal government, State of California, and County as discussed below. The County is the lead agency for the CEQA environmental review process in accordance with state law and local ordinances.

Coordination efforts for the proposed Project to date consist of an initial consultation meeting with staff from the County on September 9, 2013. HELIX attended a site visit with County staff on June 20, 2014 and a meeting with County staff on September 24, 2014.

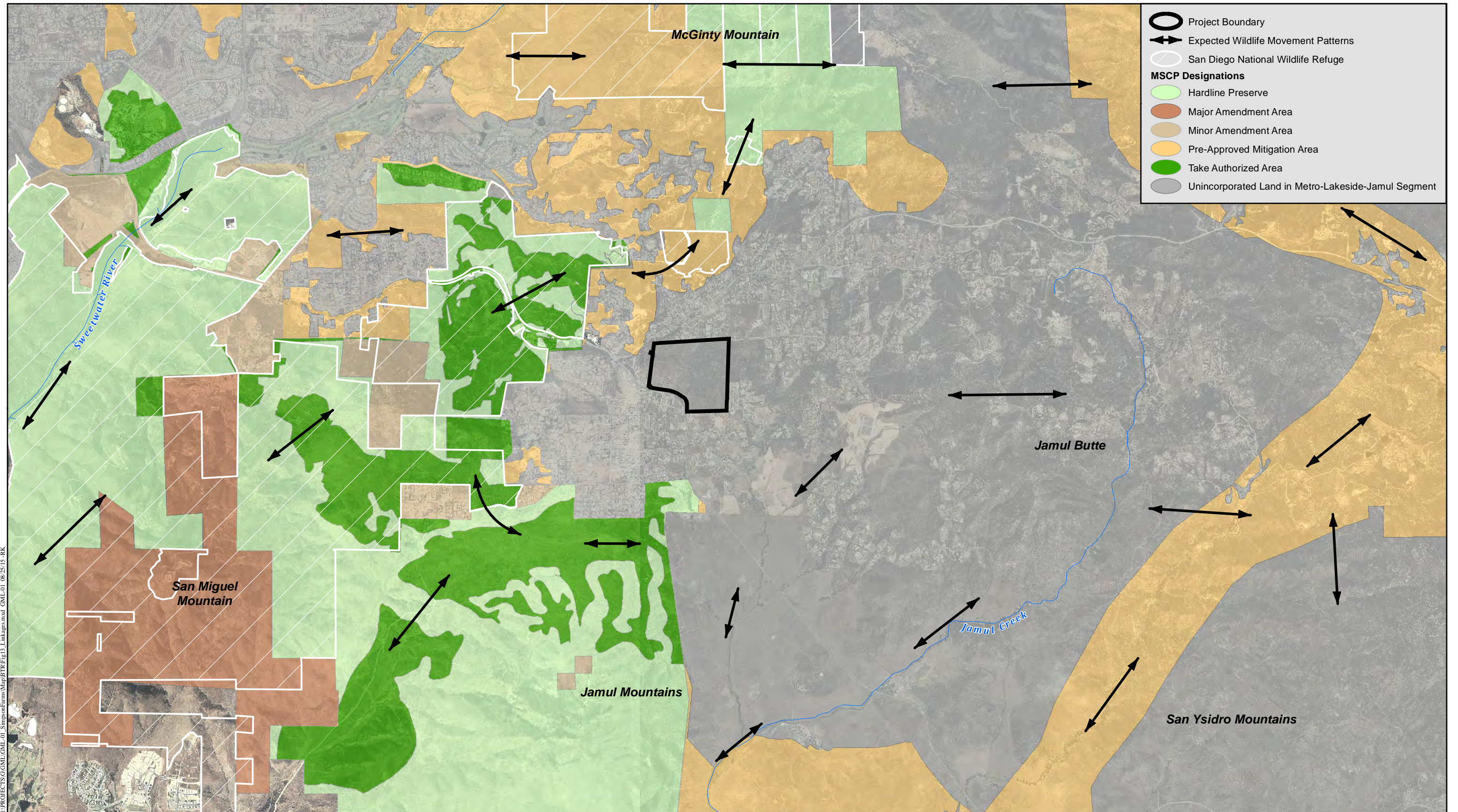
Laws and regulations that apply include federal Endangered Species Act (ESA), Clean Water Act, California Environmental Quality Act (CEQA), California Fish and Game (CFG) Code, County MSCP Subarea Plan, RPO, and County Biological Mitigation Ordinance (BMO). Under CEQA, impacts associated with a proposed Project or program are assessed with regard to significance criteria determined by the CEQA Lead Agency (in this case, the County) pursuant to State CEQA Guidelines.

1.5.1 Federal Government

Administered by the USFWS, the federal ESA provides the legal framework for the listing and protection of species (and their habitats) 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.

The USFWS identifies critical habitat for endangered and threatened species. Critical habitat is defined as areas of land considered necessary for endangered or threatened species to recover. The ultimate goal is to restore healthy populations of listed species within their native habitat so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the federal ESA, all federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat. No critical habitat for any species occurs on site.

Section 4(d) of the federal ESA regulates actions that could jeopardize endangered or threatened species. A special rule under Section 4(d) of the ESA was finalized which authorizes “take” of



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Conceptual Corridors and Linkages

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certain protected species under approved Natural Communities Conservation Programs (NCCPs), which are administered by the states.

All migratory bird species native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season (generally February 15 to August 31). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. Commonly, construction activities are precluded within a minimum 300 ft of an active bird nest.

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the Clean Water Act (CWA). The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all WUS. Permitting for projects filling WUS (including wetlands) is overseen by the USACE under Section 404 of the CWA. In addition, when a Section 404 permit is required, a CWA Section 401 Water Quality Certification is also required from the Regional Water Quality Control Board (RWQCB). It is expected that a CWA Section 404 permits and CWA Water Quality Certification would be required for the proposed Project as non-wetland WUS occur on site. The RWQCB regulates isolated Waters of the State, not subject to CWA Section 401, under the State Porter-Cologne Water Quality Control Act.

1.5.2 State of California

The CFG Code regulate species listed as threatened or endangered under the California ESA. The California ESA is similar to the federal ESA in that it contains a process for listing of species and regulating potential impacts to listed species. Section 2081 of the California ESA authorizes the CDFW to enter into a memorandum of agreement for take of listed species for scientific, educational, or management purposes.

The Native Plant Protection Act (NPPA) enacted a process by which plants are listed as rare or endangered. The NPPA regulates collection, transport, and commerce in listed plants. The California ESA followed NPPA and covers both plants and animals determined to be endangered or threatened with extinction. Plants listed as rare under NPPA were designated rare under the California ESA.

The CFG Code (Sections 1600 *et seq.*) requires an agreement with the CDFW for projects affecting riparian and wetland habitats through issuance of a Streambed Alteration Agreement. It is assumed that the Project would require a CDFW 1602 Streambed Alteration Agreement.

CEQA and its implementing guidelines (State CEQA Guidelines) require that discretionary projects be reviewed in accordance with its provisions. Mitigation for significant impacts to the environment is determined through the CEQA environmental review process in accordance with existing laws and regulations.

1.5.3 County of San Diego

Multiple Species Conservation Program

The California Natural Communities Conservation Planning (NCCP) Act of 1991 (Section 2835) allows the CDFW to authorize take of species covered by plans in agreement with NCCP guidelines. A Natural Communities Conservation Program initiated by the State of California focuses on conserving coastal sage scrub, and in concert with the USFWS and the federal ESA, is intended to avoid the need for future federal and state listing of coastal sage scrub dependent species.

The MSCP has been prepared to meet the requirements of the California NCCP, federal ESA, and California ESA. It is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species by identifying key areas for preservation as open space in order to link core biological areas into a regional wildlife preserve. The County's MSCP Subarea Plan (County 1997) implements the MSCP within the unincorporated areas under County jurisdiction.

County MSCP Subarea Plan

The Simpson Farms property is located within the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan (Figure 4). Although it is a relatively large undeveloped area within the County, it is outside of the federal/state identified PAMA per the Metro-Lakeside-Jamul segment of the County MSCP Subarea. The majority of the property has been evaluated as medium-to-low-value habitat by MSCP, and the site does not meet the requirements of a BRCA according to the BMO of the County as described below. Thus, this property was anticipated by the MSCP to eventually be developed with mitigation being directed to PAMA areas. Take of covered species and their habitat is authorized for projects that satisfy the requirements of the County's BMO.

Biological Mitigation Ordinance

The BMO is the mechanism by which the County implements the County MSCP Subarea Plan at the project level within the unincorporated area to attain the goals set forth in the County MSCP Subarea Plan. The BMO contains design criteria and mitigation standards which, when applied to projects requiring discretionary permits, protect habitats and species and ensure that a project does not preclude the viability of the MSCP Preserve System. In this way, the BMO promotes the preservation of lands that contribute to contiguous habitat core areas or linkages.

Under the BMO, habitat is considered a BRCA if it meets certain criteria. An analysis for the proposed Project is provided below. According to the BMO, the impact site is determined to be a BRCA if it meets one or more of the following criteria:

i) The land is shown as preapproved mitigation area on the wildlife agencies' preapproved mitigation map, (Attachment F of Document No. 0769999 on file with the Clerk of the Board).

The site does not occur within PAMA and, therefore, does not meet this criterion.

ii) The land is located within an area of habitat which contains biological resources that support or contribute to the long-term survival of Sensitive Species, which determination is based upon a biological analysis approved by the Director, and is adjacent or contiguous to preserved habitat that is within the preapproved mitigation area on the wildlife agencies' preapproved mitigation map (Attachment F of Document No. 0769999 on file with the Clerk of the Board);

The site does contain native habitats that support a few non-listed sensitive species. Rare plant surveys identified only three sensitive plants on the site, including Engelmann oak, San Diego sunflower, and spiny rush, all of which have populations that are relatively stable and widespread in San Diego County. In addition, only four non-listed sensitive animals were observed or otherwise detected during surveys, including Cooper's hawk, turkey vulture, western bluebird, and San Diego black-tailed jackrabbit. These species, although sensitive, are relatively widespread within San Diego County. Protocol-level surveys conducted in 2014 and 2015 for Quino checkerspot butterfly, Hermes copper, coastal California gnatcatcher, and burrowing owl were negative and these species are presumed absent from the site. Last, as addressed above, the site is not adjacent or contiguous with PAMA. Therefore, the site does not meet this criterion.

iii) The land is part of a regional linkage/corridor. A regional linkage/corridor is either:

A. Land which contains topography which serves to allow for the movement of all sizes of wildlife and is used by wildlife, including large animals on a regional scale; and contains adequate vegetation cover providing visual continuity so as to encourages the use of the corridor by wildlife; or

B. It has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher, MSCP Resource Document Volume II, Appendix A-7 (Attachment I on file with the Clerk of the Board as Document No. 0769999).

The site does not contain and does not contribute to any functioning wildlife corridor or linkage. The site is not identified as a primary linkage/corridor between northern and southern regional populations of gnatcatcher. The site is not identified as a local or regional corridor or linkage in the MSCP.

The site is relatively flat and does not support topographic features typically associated with corridor/linkage areas, such as major ridgelines, steep gullied land, valley floor, or continuous riparian corridor. Vegetative cover on the site is predominately open grassland and scrub, which provide limited cover and resources. The drainage features on the site support ephemeral flows and offer limited cover and resources.

Land to the immediate north, south, east, and west is constrained by existing development and agricultural uses. Figure 13 depicts the expected wildlife movement patterns in the region. Wildlife movement is expected to occur between undeveloped blocks of habitat located further to the north within the expansive open space surrounding McGinty Mountain; to the south in the expansive open space surrounding Jamul Mountains and Jamul Creek; to the east near Jamul Butte; and to the west out near the Sweetwater River and the San Diego National Wildlife Refuge.

The site is entirely enclosed by perimeter chain-link fence which serves as a barrier to movement to and from the site for small and large mammals. A clear north-south trending corridor/linkage does not exist over the site. Rural residential and roadway developments about the site and continue to the general north and south. Access onto the site from the north and south is blocked by existing development barriers and incompatible land uses that preclude most wildlife from using the areas. Similarly, a clear, east-west corridor/linkage through the site does not exist. Land to the east is constrained by existing rural residential development. Large mammals, in particular, would be challenged to move onto the site from the east. They would have to navigate through a network of non-contiguous, linear patches of undeveloped land situated in-between existing developments. As depicted on Figure 13, the more likely route from the east of the site would be south, around the site, moving west from the Jamul Butte area, across State Route 94 and the Jamul Mountains area, toward San Miguel Mountain and the San Diego Wildlife Refuge. Similarly, large mammals would be challenged to move onto the site from the west. In addition to existing rural residential developments, several major roads occur to the immediate west of the site. These roads were confirmed by HELIX site visits to lack suitable wildlife undercrossings to accommodate unobstructed movement and would, therefore, impede wildlife movement in the local area. Therefore, the site does not meet this criterion.

iv) The land is shown on the Habitat Evaluation Map (Attachment J of Document No. 0769999 on file with the Clerk of the Board) as Very High or High and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as Biological Resource Core Area;

A portion of the site is identified as Very High habitat value; however, the area does not link significant blocks of habitat. As discussed above, the site does not contain and does not contribute to any functioning wildlife corridor or linkage. Land in all directions is constrained by existing development and agricultural uses. A clear, east-west corridor/linkage through the site and area identified as Very High quality habitat does not exist. Therefore, the site does not meet this criterion.

v) The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of Sensitive Species;

The site does not consist of and is not located within a block of habitat greater than 500 acres. The existing habitat is disturbed and based on survey findings to date does not support listed species. Therefore, the site does not meet this criterion.

vi) The land contains a high number of Sensitive Species and is adjacent or contiguous to surrounding undisturbed habitats, or contains soil derived from the following geologic formations which are known to support Sensitive Species:

- A. gabbroic rock;*
- B. metavolcanic rock;*
- C. clay;*
- D. coastal sandstone.*

The site does not contain a high number of sensitive species and is not adjacent or contiguous to undisturbed habitats. The site does not support the soils listed above. Therefore, the site does not meet this criterion.

As detailed above, the project site does not meet the criteria to be considered BRCA. The BMO also direct that projects should incorporate avoidance of impacts to 80 percent of local populations of County List A and B sensitive plants. However, no County List A or B plants were recorded on site.

Resource Protection Ordinance

The County regulates natural resources (among other resources) via the RPO, the regulations of which cover wetlands, sensitive plants and animals, sensitive habitats, and habitats containing sensitive animals or plants as sensitive biological resources. Sensitive habitat lands are identified by the RPO as lands that contain “unique vegetation communities and/or the habitat that is either necessary to support a viable population of sensitive species, is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor. Habitats considered sensitive or significant under CEQA are not necessarily considered RPO sensitive habitat lands.” It is the intent of the RPO to increase the preservation and protection of the County’s unique topography, natural beauty, biological diversity, and natural and cultural resources.

For the same reasons as described above for BRCA, none of the habitat on site meets the criteria for RPO sensitive habitat lands. A total of 0.19 acre of RPO wetlands occurs on the site, consisting of southern willow scrub and southern coast live oak riparian forest. An additional 0.11 acre occurs off site immediately west of Jefferson Road as southern coast live oak riparian forest.

2.0 PROJECT EFFECTS

Direct impacts are immediate impacts resulting from the permanent removal of habitat. Direct impacts were quantified by overlaying the limits of all Project grading and fuel management zones on the biological resources map of the site for the proposed Project. Indirect impacts are all actions that are not direct removal of habitat, but affect the surrounding biological resources either as a secondary effect of the direct impacts or as the cause of degradation of a biological resource over time. Projects can have a wide variety of indirect impacts depending on the nature of the project, such as edge effects, animal behavioral changes, and errant construction. Cumulative impacts are those caused by numerous projects in the region and their additive effect of multiple direct and indirect impacts to biological resources over time.

2.1 SPECIAL STATUS SPECIES

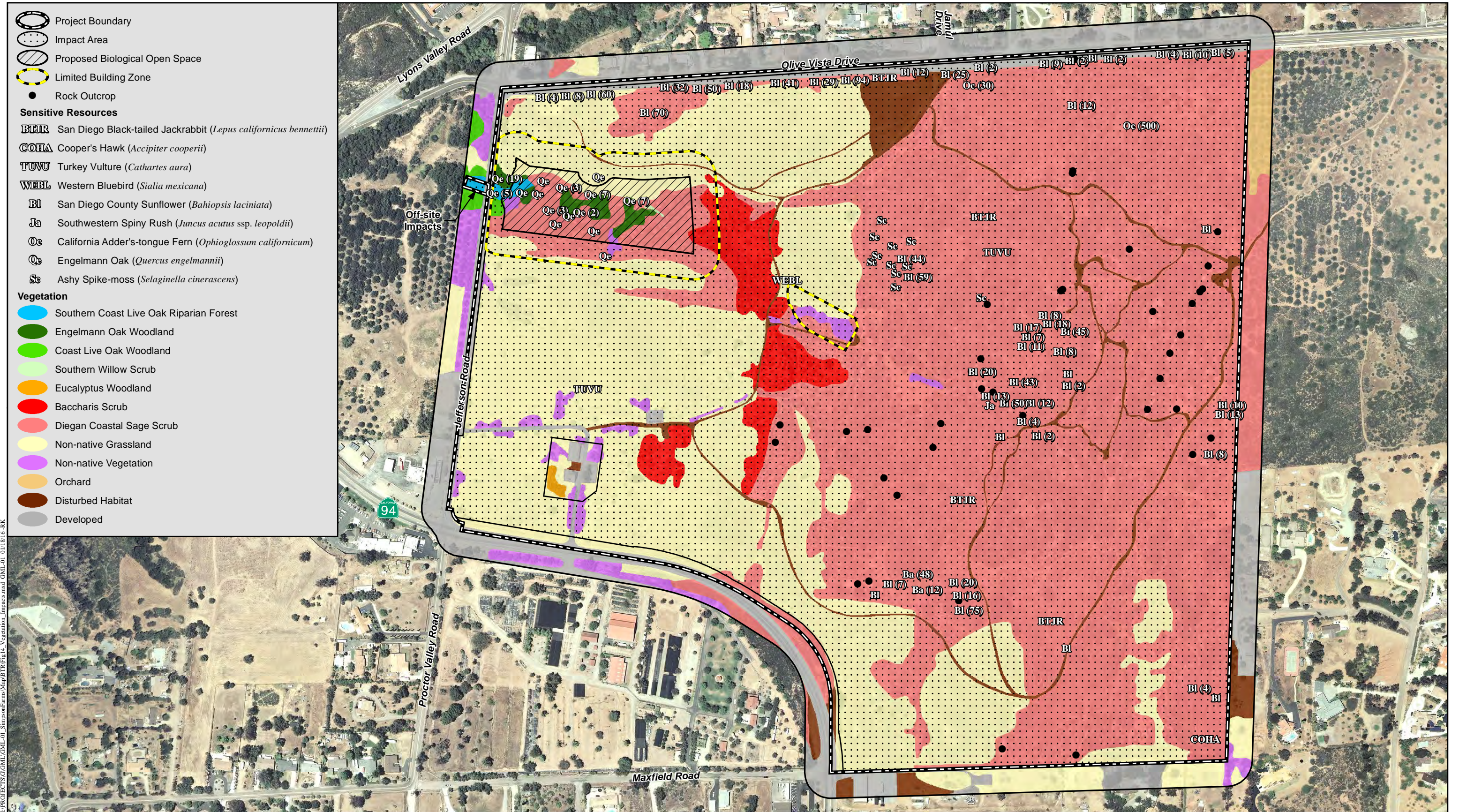
Five sensitive plant species (Engelmann oak; San Diego sunflower; spiny rush; California adder’s tongue; ashy spike-moss) were observed on the Project site (Figure 7). Although not observed during surveys, two additional non-listed sensitive plant species were determined to have a high potential to occur (graceful tarplant and rush-like bristleweed). The potential for

sensitive plant species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions (Appendix C). Listing codes are explained in Appendix F. Focused rare plant surveys found no listed or sensitive plant species besides the three named above. The spiny rush individual, all of the ashy spike-moss, all of the approximately 530 individuals of California adder's tongue, and all of the approximately 1,096 individuals of San Diego sunflower observed on the site would be affected by the proposed Project, while most of the 52 Engelmann oaks would be avoided (Figure 14).

Four sensitive animal species (Cooper's hawk; turkey vulture; western bluebird; San Diego black-tailed jackrabbit), were observed on or flying over the Project site (Figure 14). Although not observed or otherwise detected during surveys, nine additional non-listed sensitive animal species were determined to have a high potential to occur (coast patch-nosed snake, coastal rosy boa, coastal western whiptail, Coronado skink, northern red diamond rattlesnake, orange-throated whiptail, grasshopper sparrow, red-shouldered hawk, and rufous-crowned sparrow). No federal or state listed animal species were observed or detected on site. The potential for sensitive animal species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions (Appendix D). Listing codes are explained in Appendix F.

2.2 RIPARIAN HABITAT OR SENSITIVE NATURAL COMMUNITY

The proposed Project would result in direct impacts to approximately 145.8 acres of sensitive habitat including 90.1 acres of Diegan coastal sage scrub, 50.1 acres of non-native grassland, 4.9 acres of baccharis scrub, 0.1 acre of Engelmann oak woodland, 0.1 acre of coast live oak woodland, and 0.07 acre of southern coast live oak riparian forest (Table 4; Figure 14). Lot 97 totaling approximately 6.62 acres would be placed within biological open space easement would be avoided and assessed as impact neutral. Lot 98 will be restricted by a limited building zone easement and will be considered impacted. The Simpson house will be placed in a cultural easement approximately 1.7 acres in size. The area is also assessed as impact neutral because it is expected that the existing habitat will remain intact and the only disturbance associated with fire clearing requirements would be vegetation mowing and trimming as opposed to complete removal of the habitat. Areas within 100 feet of the structure are subject to existing brush management allowances.



Vegetation and Sensitive Resources/Impacts

SIMPSON FARMS

**Table 4
IMPACTS TO VEGETATION COMMUNITIES**

VEGETATION COMMUNITY/HABITAT*	ON-SITE IMPACTS	OFF-SITE IMPACTS	IMPACT NEUTRAL	TOTAL IMPACTS
Tier I				
Southern willow scrub (63320)	--	-	0.02	-
Southern coast live oak riparian forest (61310)	0.07	0.07	-	0.14
Engelmann oak woodland (71180)	0.1	-	0.64	0.1
Coast live oak woodland (71160)	0.1	-	0.7	0.1
Tier II				
Baccharis scrub (32530)	4.9	-	0.05	4.9
Diegan coastal sage scrub (32500)	90.1	-	3.04	90.1
Tier III				
Non-native grassland (42200)	50.1	-	2.33	50.1
Tier IV				
Eucalyptus woodland (79100)	-	-	-	-
Non-native vegetation (11000)	1.2	-	0.34	1.2
Disturbed habitat (11300)	4.3	-	0.14	4.3
Developed (12000)	1.9	<0.1 (0.02)	2.47	1.9
TOTAL	162.00	0.09	8.32	152.8

*Vegetation categories and numerical codes are from Oberbauer (2005)

2.3 JURISDICTIONAL WETLANDS AND WATERWAYS

The proposed Project would impact 3,629 ft of on-site non-wetland WUS, for a total on-site impact of 0.15 acre (Table 5; Figure 15). The Project would also impact less than 0.01 acre (0.005 acre) and 73 ft of non-wetland WUS off site for roadway and storm drain improvements. The same length of CDFW streambed would be impacted, for an on-site impact of 0.31 acre, along with 0.07 acre of southern coast live oak riparian forest affected by the widening of Jefferson Road, for a total CDFW impact of 0.38 acre (Table 5; Figure 16). San Diego County RPO wetland impacts would total 0.14 acre of southern coast live oak riparian forest (Table 5; Figure 17) and are described in further detail below. A total of 0.06 acre of non-wetland WUS and 0.33 acre of riparian and streambed habitat would be placed in biological open space easement and preserved in perpetuity (Figure 18).

**Table 5
IMPACTS TO WETLANDS / JURISDICTIONAL WATERS**

WETLANDS/ JURISDICTIONAL WATERS	PROJECT SITE		OFF SITE		IMPACT NEUTRAL		TOTAL IMPACTS	
	Area (ac)	Length (ft)	Area (ac)	Length (ft)	Area (ac)	Length (ft)	Area (ac)	Length (ft)
USACE								
Non-wetland WUS	0.22	4,614	0.01	73	0.07	985	0.16	3,702
TOTAL USACE	0.22	4,614	0.01	73	0.07	985	0.16	3,702
CDFW								
Engelmann Oak Woodland	0.14	-	-	-	0.14	-	-	-
Southern Coast Live Oak Riparian Forest	0.17	-	0.11	-	0.14	-	0.14	-
Southern Willow Scrub	0.02	-	-	-	0.02	-	-	-
Streambed	0.35	4,614	-	-	0.11	912	0.24	3,702
TOTAL CDFW	0.68	4,614	0.11	-	0.41	912	0.38	3,702
San Diego County RPO								
Southern Coast Live Oak Riparian Forest	0.17	-	0.11	-	0.14	-	0.14	-
Southern Willow Scrub	0.02	-	-	-	0.02	-	-	-
TOTAL SAN DIEGO COUNTY RPO	0.19	-	0.11	-	0.16	-	0.14	-

The Project will require unavoidable impacts to 0.14 acre of southern coast live oak riparian forest considered RPO wetlands. These RPO impacts have been minimized to the maximum extent and impacts remaining are required as necessary road crossing improvements to widen Jefferson Road and to replace the existing storm drain culvert, which is currently inadequate. The improvements have been planned within existing easement and right-of-way for the road to the greatest extent possible. Permanent impacts have been minimized to the greatest extent. Impacts are not anticipated to have a substantial adverse effect on the biological functions, values, and services of the existing RPO wetland.

Under existing conditions, Jefferson Road floods and the replacement of two existing 24" pipes with three 36" pipes to avoid flooding problems is required. In order to access and maintain the drainage facilities, the access road shown on the grading plan on the project side of Jefferson Road is also required. The anticipated improvements would include widening of Jefferson Road and culvert facilities that would span the flood limits of the underlying ephemeral drainage. The improvements would allow for safe mobility over the drainage and improved storm flow beneath the road crossing.

The RPO section 86.604(a)(5) provides the following criteria to allow road crossings to impact RPO wetlands:



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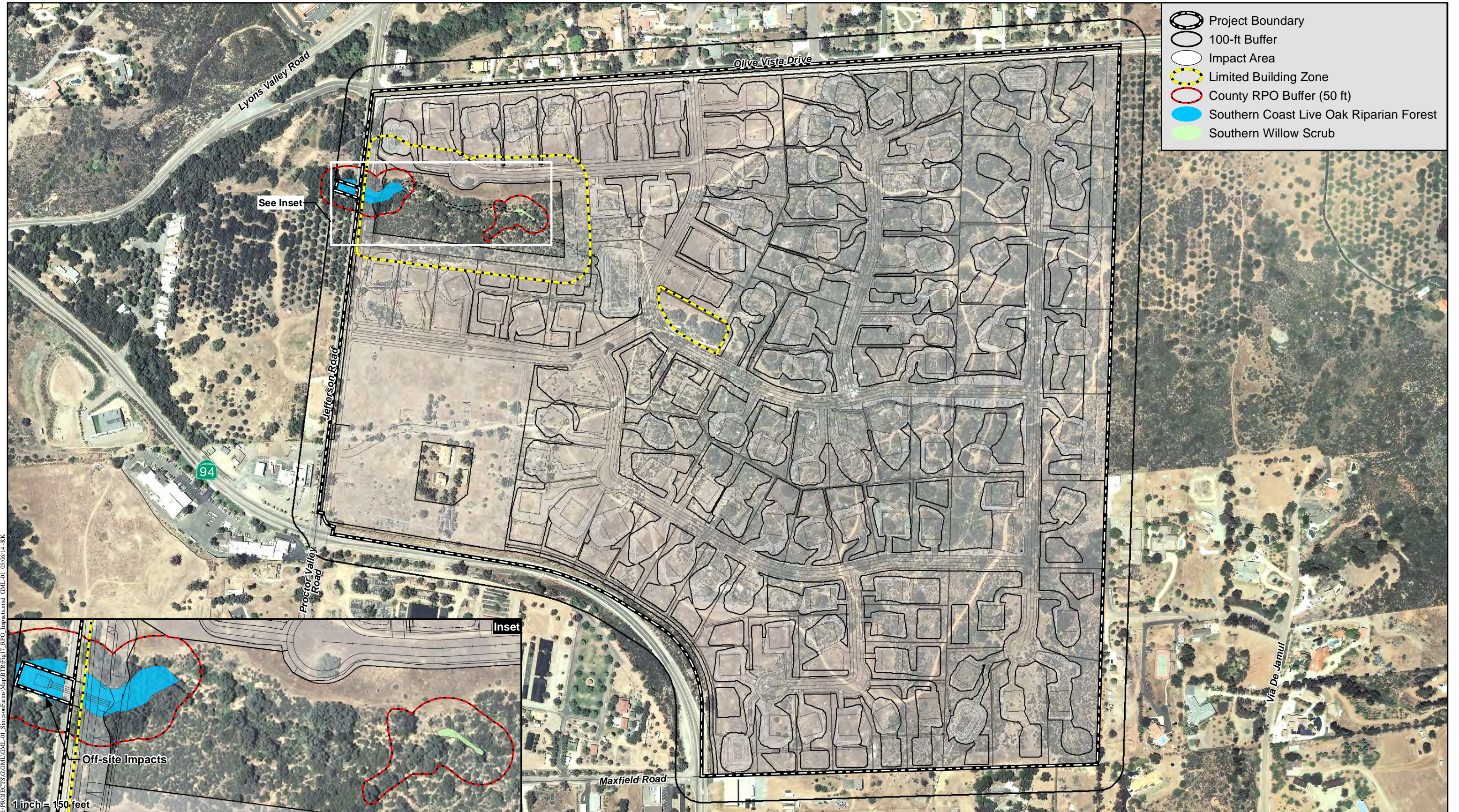
Waters of the U.S./Impacts

SIMPSON FARMS



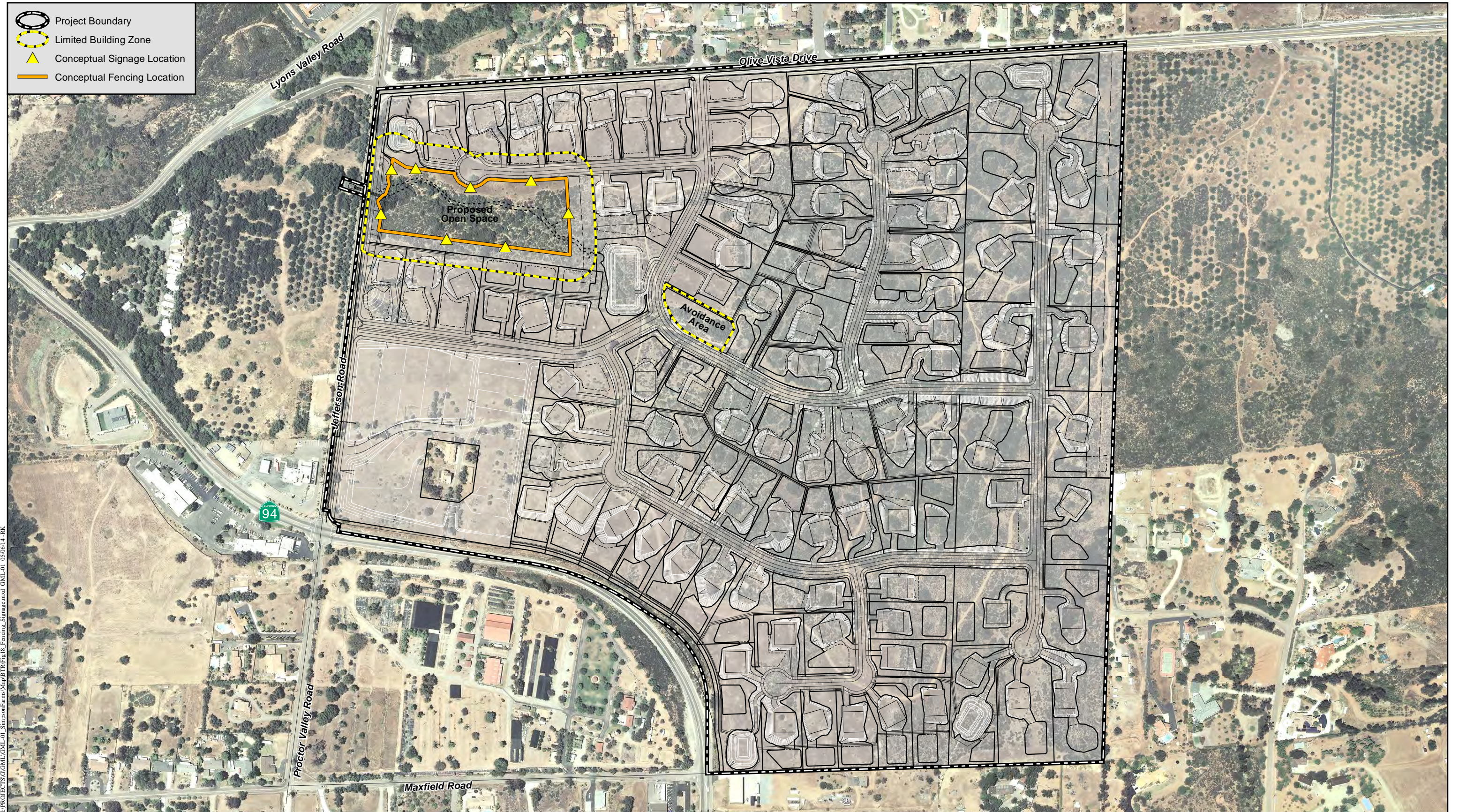
Waters of the State/Impacts

SIMPSON FARMS



County of San Diego RPO Wetlands/Impacts

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Open Space, Conceptual Fencing, and Signage

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Crossings of wetlands for roads, driveways or trails/pathways dedicated and improved to the limitations and standards under the County Trails Program, that are necessary to access adjacent lands, when all of the following conditions are met:

(aa) There is no feasible alternative that avoids the wetland;

There is no feasible alternative to avoid the wetland due to existing constraints and requirements by the County to provide improvements at this specific location.

(bb) The crossings are limited to the minimum number feasible;

There is only one crossing proposed and it cannot be avoided, thus it is the minimum number feasible.

(cc) The crossings are located and designed in such a way as to cause the least impact to environmental resources, minimize impacts to sensitive species and prevent barriers to wildlife movement (e.g., crossing widths shall be the minimum feasible and wetlands shall be bridged where feasible);

Additional RPO wetland occurs on both the east and west sides of the Jefferson Road. The proposed culvert improvements minimize impacts to sensitive species because a clear span bridge would require a much larger construction disturbance footprint resulting in more permanent impacts to the southern coast live oak riparian forest habitat. The road widening and culvert improvements would provide a superior condition for wildlife movement to that which currently exists. The improvements would be restricted to only those necessary to provide a safe crossing and enhance the biological and hydrological functions and services of the reach. The impacts would be primarily temporary for equipment access and staging during construction. Permanent impacts would be limited to removal of a few trees to accommodate construction vehicle access. The impacts are necessary to remove the existing culvert, construct the new road crossing and culvert, stabilize the channel embankment, and restore the riverine hydrology of the reach. Oak trees and other riparian resources would be avoided to the maximum extent possible.

(dd) The least-damaging construction methods are utilized (e.g., staging areas shall be located outside of sensitive areas, work shall not be performed during the sensitive avian breeding season, noise attenuation measures shall be included and hours of operation shall be limited so as to comply with all applicable ordinances and to avoid impacts to sensitive resources);

Staging areas are planned to be restricted to the proposed impact footprint and within existing disturbed and developed uplands within the Jefferson Road right-of-way or to the north and south of the southern coast live oak riparian forest canopy. Breeding season avoidance will be included in the conditions of approval. Noise and hours of operation shall be limited in order to comply with the Noise Ordinance and Grading Ordinance.

(ee) The applicant shall prepare an analysis of whether the crossing could feasibly serve adjoining properties and thereby result in minimizing the number of additional crossings required by adjacent development; and

Jefferson Road is a public road and already serves adjoining properties.

(ff) There must be no net loss of wetlands and any impacts to wetlands shall be mitigated at a minimum ratio of 3:1 (this shall include a minimum 1:1 creation component, while restoration/enhancement of existing wetlands may be used to make up the remaining requirements for a total 3:1 ratio).

Temporary impact areas would be restored. Loss of RPO jurisdictional Southern Coast Live Oak Riparian forest habitat would be compensated in accordance with Mitigation Measure (MM) 7.4.1.

2.4 WILDLIFE MOVEMENT AND NURSERY SITES

As discussed above, the Project site does not include any wildlife corridors or provide connectivity between existing open space areas. Therefore, the proposed development would not impact wildlife corridors or movement. Additional analysis is provided below.

3.0 SPECIAL STATUS SPECIES

3.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

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 USFWS or CDFW?

Any of the following conditions would be considered significant if:

- A. The project would impact one or more individuals of a species listed as federally or state endangered or threatened.
- B. The project would impact the survival of a local population of any County Group A or B plant species, or a County Group 1 animal species, or a species listed as a State Species of Special Concern.
- C. The project would impact the regional long-term survival of a County Group C or D plant species or a County Group 2 animal species.
- D. The project may impact arroyo toad aestivation or breeding habitat.
- E. The project would impact golden eagle habitat.
- F. The project would result in a loss of functional foraging habitat for raptors.
- G. The project would impact the viability of a core wildlife area.
- H. The project would cause indirect impacts to proposed or existing open space likely to harm sensitive species over the long term.
- I. The project would impact occupied burrowing owl habitat.

- J. The project would impact occupied coastal cactus wren habitat or formerly occupied coastal cactus wren habitat that has been burned by fire.
- K. The project would impact occupied Hermes copper habitat.
- L. The project would impact nesting success of sensitive bird (as listed in Section 4.1 of the Guidelines for Determining Significance) through grading, clearing, fire fuel modification, and/or noise generating activities such as construction.

3.2 ANALYSIS OF PROJECT EFFECTS

The following Project effects would be considered significant because one or more of the following guidelines would be met:

- 3.1.A No listed species were observed on the site during biological surveys conducted in 2014 and 2015. The site is currently presumed to be unoccupied by listed species, including the Quino checkerspot butterfly and coastal California gnatcatcher (CAGN). The riparian habitat on site was further evaluated for its potential to provide suitable habitat for the least Bell's vireo; however, after evaluation of habitat suitability and multiple surveys for other species, it was determined that the existing riparian scrub and woodland habitat is not suitable for vireo and the species has a low potential to temporarily stop over during migration. The species is not likely to use the on-site habitat for breeding because it is not suitable. No vireos were observed or otherwise detected during 2014 and 2015 surveys and the project would have no impact on the species. There is an historical record of CAGN at the Project site from 1999; however, protocol-level surveys conducted during the breeding seasons of 2014 and 2006 confirmed the species' absence from the site. Although CAGN is currently presumed to be absent and the habitat is currently considered to be unoccupied, the Project site still supports suitable Diegan coastal sage scrub habitat. Although unlikely, based on survey data, it is possible that CAGN could relocate onto the site in the future if habitat conditions remain unchanged, Although not expected, implementation of the proposed Project could potentially affect individuals of this species by disrupting breeding behavior or nest disturbance, in the unlikely event that the Project site becomes occupied by breeding CAGN at the time of project construction.
- 3.1.F Raptor species (e.g., Cooper's hawk, red-tailed hawk) use non-native grassland as well as open shrub lands (e.g., Diegan coastal sage scrub) for foraging. Additionally, raptors nest in eucalyptus woodlands, such as those found on site, although no nests were detected during any surveys of the site. Implementation of the proposed Project would directly impact 90.1 acres of Diegan coastal sage scrub and 50.1 acres of non-native grassland (Table 4; Figure 13). As such, impacts to functional foraging habitat would total 140.2 acres and would be potentially significant at the project level under County Guideline 3.1.F, but would not be expected to have an adverse effect on the regional long-term survival of any raptor species given the abundance of open space west and north of Jamul.

3.1.L Noise from such sources as clearing and grading could result in an impact to wildlife. Noise-related impacts would be considered significant if sensitive species (such as raptors) were displaced from their nests and failed to breed. Raptors or other sensitive bird species nesting within any area impacted by noise exceeding 60 decibels (dB) or ambient could be significantly impacted. If tree-nesting raptors are present within 500 ft of the impact area, effects resulting from construction noise would be significant according to County Guidelines 3.1.L.

The proposed Project would not result in significant impacts under the above guidelines for the following reasons:

3.1.B Cooper's hawk and turkey vulture (Group 1 animal species) were observed temporarily flying over the Project site during 2014 surveys. Cooper's hawk was not observed nesting on the site during the 2014 surveys, but could forage over the site. Turkey vulture is not likely to nest on the site due to lack of suitable habitat, but could forage over the site. In addition, although not observed or otherwise detected during 2014 and 2015 surveys, the following Group 1 species have a high potential to occur: grasshopper sparrow (nesting and foraging), red-shouldered hawk (nesting and foraging), and rufous-crowned sparrow (nesting and foraging). Potential impacts to Group 1 animals would be limited to temporary displacement of individuals and loss of potential habitat. These impacts, however, would not adversely affect the long-term survival of local populations of these species as avian species are able to disperse from the impact area. No County Group A or B plant species were observed on the Project site. Under County Guideline 3.1.B, no significant impact would occur.

3.1.C Implementation of the proposed Project would directly impact a single spiny rush, approximately 530 individuals of California adder's tongue, two patches of ashy spike-moss, approximately 10 individuals of Engelmann oak, and approximately 1,096 individuals of San Diego sunflower, all of which are County Group D species. Southwestern spiny rush occurs in multiple locations surrounding the site, including locations within the San Diego National Wildlife Refuge and Otay County Open Space Preserve. California adder's tongue occurs in multiple locations surrounding the site, including locations within the Cleveland National Forest and Otay County Open Space Preserve. San Diego sunflower and Engelmann oak are both widespread and occur within preserved areas. In addition, although not observed during surveys, two more County Group D species have a high potential to occur: graceful tarplant and rush-like bristleweed. Graceful tarplant occurs in multiple locations to the west of the site, including within the San Diego National Wildlife Refuge and Otay County Open Space Preserve. Rush-like bristleweed occurs in multiple locations to the east, north and south of the site, including multiple locations within the San Diego National Wildlife Refuge and Cleveland National Forest. The Project would preserve approximately 42 Engelmann oaks within the on-site biological open space. Given the extent of these species across the region in preserved areas associated with the San Diego National Wildlife Refuge and elsewhere, the project impacts would not significantly threaten the regional survival of the observed species, nor the high potential species, were they to occur on site. In addition, although not observed or otherwise detected during 2014 and 2015 surveys, the following Group 2 animal species have a high potential to occur: coast patch-nosed

snake, coastal rosy boa, coastal western whiptail, Coronado skink, northern red-diamond rattlesnake, and orange-throated whiptail. Given the extent of these species within Diegan coastal sage scrub in preserved areas associated with the San Diego National Wildlife Refuge and elsewhere, this impact would not significantly threaten the regional survival of these species. Under County Guidelines 3.1.C, no significant impact would occur.

- 3.1.D The site does not support arroyo toad aestivation or breeding habitat. Under County Guideline 3.1.D, no significant impact would occur.
- 3.1.E No golden eagle habitat occurs within the Project boundary. The site is surrounded by development and has no mountains or ridges onsite suitable for eagle nesting. The SanBIOS data reports a golden eagle sighting approximately 0.25 mile to the west of the site within rural residential development near Vista Diego Road. No suitable nesting or foraging habitat currently occurs at this location. The closest eagle nesting habitat is reported at an excess of 10.0 miles east of the site. The site may be used for foraging habitat although larger more suitable foraging habitat not surrounded by development is located within 1-2 miles to the north, south, and west. Extensive open space lands associated with the San Diego National Wildlife refuge lie to the west and north; Otay County Open Space Preserve lies to the southwest; and sparse development in Lyons Valley to the east. Under County Guideline 3.1.E, no significant impact would occur.
- 3.1.G The Project site is not a part of a core wildlife area and Project implementation would not impact the viability of core wildlife areas. Under County Guideline 3.1.G, no significant impact would occur.
- 3.1.H The proposed Project is residential in nature, and as such, domestic predators (namely cats) may be introduced to the surrounding habitat. Although such introductions have potential to harm native wildlife species, the Project site is surrounded by existing development on all sides, and the impact of domestic predators is not anticipated to increase substantially above the current level. As a result, no significant impact under County Guideline 3.1.H would occur.
- 3.1.I The Project site does not support occupied burrowing owl habitat. No significant impact under County Guideline 3.1.I would occur.
- 3.1.J The Project site does not support coastal cactus wren habitat, nor any former coastal cactus wren habitat altered by fire. No significant impact under County Guideline 3.1.J would occur.
- 3.1.K The Project site does not support occupied Hermes copper habitat. No significant impact under County Guideline 3.1.K would occur.

3.3 CUMULATIVE IMPACT ANALYSIS

Implementation of the proposed Project would contribute to the cumulative loss of biological resources in San Diego County. The cumulative losses have been addressed by the

implementation of the MSCP as well as the General Plan Update EIR. The Project will comply with the requirements of the BMO and MSCP.

3.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impact 3.4.1 Clearing and grubbing activities during the CAGN breeding season could potentially affect breeding CAGN in the unexpected event that the site becomes occupied.

MM 3.4.1 No grading, clearing, or blasting shall occur within 300 ft of occupied Diegan coastal sage scrub during the breeding season of the coastal California gnatcatcher (March 1 – August 15). As such, all grading permits, improvement plans, and the final map shall state the same. If clearing, grading, or blasting would occur during the breeding season for the gnatcatcher, a pre-construction survey shall be conducted to determine whether gnatcatchers occur within the areas impacted by noise. To avoid take under the ESA, impacts shall be avoided within 300 ft of nesting gnatcatchers. If there are no gnatcatchers nesting (includes nest building or other breeding/nesting behavior) within this area, grading, clearing, or blasting shall be allowed to proceed. However, if any gnatcatchers are observed nesting or displaying breeding/nesting behavior within the area, construction shall be postponed until all nesting (or breeding/nesting behavior) has ceased or until after August 15.

Impact 3.4.2 The Project would result in the loss of 140.2 acres of functional foraging habitat in the form of non-native grassland and Diegan coastal sage scrub.

MM 3.4.2 Mitigation for impacts to non-native grassland shall occur at a 0.5:1 ratio through purchase of 25.1 acres of non-native grassland or alternative like-functioning habitat credit at an approved mitigation bank in consultation with the County prior to issuance of a grading permit. Mitigation for impacts to Diegan coastal sage scrub shall occur at a 1:1 ratio through purchase of 90.1 acres of Diegan coastal sage scrub or alternative like-functioning habitat credit at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit.

Impact 3.4.3 Construction-related noise may significantly impact sensitive bird species that may be nesting within an area such that construction noise at the nest exceeds 60 dB.

MM 3.4.3 No grubbing, clearing, or grading within 500 ft of active tree-nesting raptor (i.e., Cooper's hawk) habitat (January 15 to July 15) shall occur. As such, all grading permits, improvement plans, and the final map shall state the same. If grubbing, clearing, or grading would occur during the raptor breeding season, a pre-construction survey shall be conducted to determine whether these species occur within the areas impacted by noise. If there are no raptors nesting (includes nest building or other breeding/nesting behavior) within this area, development shall be allowed to proceed. However, if raptors are observed nesting or

displaying breeding/nesting behavior within the area, construction shall (1) be postponed until all nesting (or breeding/nesting behavior) has ceased or until after July 15; or (2) a temporary noise barrier or berm shall be constructed at the edge of the development footprint to ensure that noise levels are reduced to below 60 dB or ambient. Alternatively, the use of construction equipment could be scheduled to keep noise levels below 60 dB or ambient in lieu of, or in concert with, a wall or other noise barrier.

3.4.1 Plant Species

The proposed Project will have a direct impact on spiny rush, Engelmann oak, ashy spike-moss, California adder's tongue, and San Diego sunflower, as well as potential habitat for graceful tarplant and rush-like bristleweed. These are all List D species under the County Guidelines. As discussed above, impacts are less than significant because they would not substantially reduce the viability of the affected population. In addition, impacts will be mitigated using habitat based mitigation in accordance with BMO.

3.4.2 Animal Species

Possible direct impacts to CAGN will be avoided by implementation of survey and avoidance measures described in MM 3.4.1. Potential impacts on Group 1 and 2 species determined present or having high potential to occur would be mitigated through compensation for the loss of habitat in accordance with MM 3.4.2 and MM 4.4.1. Possible indirect impacts to Cooper's hawk will be reduced to below significance by noise attenuation measures described in and MM 3.4.3.

3.5 CONCLUSIONS

Implementation of the proposed Project would impact three species of sensitive plants and has the potential to impact nine sensitive animal species as a result of direct disturbance, loss of foraging habitat, and noise. The recommended mitigation measures would reduce this impact to below a level of significance.

4.0 RIPARIAN HABITAT OR SENSITIVE NATURAL COMMUNITY

4.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

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 USFWS or CDFW?

Any of the following conditions would be considered significant if:

- A. Project-related construction, grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5 in the County Biological Guidelines, excluding those without a mitigation ratio) on or off the project site.

- B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by the USACE, CDFW, and County: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity, and abundance.
- C. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 ft or more from historical low groundwater levels.
- D. The project would increase human access or competition from domestic animals, pests, or exotic species to levels proven to adversely affect sensitive habitats.
- E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

4.2 ANALYSIS OF PROJECT EFFECTS

The following Project effects would be considered significant because one or more of the following guidelines would be met:

- 4.1.A Project implementation would result in direct and indirect impacts to 90.1 acres of Diegan coastal sage scrub, 50.1 acres of non-native grassland, 4.9 acres of baccharis scrub, 0.1 acre of Engelmann oak woodland, 0.1 acre of coast live oak woodland, and 0.14 acre of southern coast live oak riparian forest. These impacts would be considered significant because County Guideline 4.1.A would be met.
- 4.1.B Implementation of the proposed Project would result in removal of vegetation and grading in 0.14 acre of habitat defined as jurisdictional by CDFW and the County. In addition, implementation of the proposed Project would result in grading and placement of fill in 3,702 linear feet of non-wetland WUS/streambed defined as jurisdictional by USACE and CDFW. These impacts would be a significant according to County Guideline 4.1.B.

The proposed Project would not result in significant impacts under the above guidelines for the following reasons:

- 4.1.C No groundwater withdrawal or other activities that could lower the groundwater table are proposed. Under County Guideline 4.1.C, no significant impact would occur.
- 4.1.D The Project site is surrounded by existing development and thus would not increase human access or competition by domestic pets in any adjacent sensitive habitats. Under County Guideline 4.1.D, no significant impact would occur.
- 4.1.E The proposed Project includes buffers of greater than 50 ft around riparian areas on the Project site. These buffers are adequate to protect the riparian areas from adverse effects,

given the small size and marginal quality of these resources at present. Existing riparian vegetation on the Project site is of very limited extent and invaded by non-native species, and provides little function and value at present. The Project proposes to place these riparian areas in an open space preserve that includes buffers up to 100 ft and fencing to exclude human access. Therefore, under County Guideline 4.1.E, no significant impact would occur.

4.3 CUMULATIVE IMPACT ANALYSIS

Implementation of the proposed Project would contribute to the cumulative loss of biological resources in San Diego County. The cumulative losses have been addressed by the implementation of the MSCP as well as the General Plan Update EIR. The Project will comply with the requirements of the BMO and MSCP.

4.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impact 4.4.1 The proposed Project would directly and indirectly impact 90.1 acres of Diegan coastal sage scrub, 50.1 acres of non-native grassland, 4.9 acres of baccharis scrub, 0.1 acre of Engelmann oak woodland, 0.1 acre of coast live oak woodland, and 0.14 acre of southern coast live oak riparian forest.

MM 4.4.1 Mitigation for impacts to Diegan coastal sage scrub shall occur at a 1:1 ratio (Table 6) through purchase of 90.1 acres of Diegan coastal sage scrub credits from an approved mitigation bank in consultation with the County and resource agencies prior to issuance of grading permit; mitigation for impacts to non-native grassland shall occur at a 0.5:1 ratio (Table 6) through purchase of 25.1 acres of non-native grassland credit at an approved mitigation bank in consultation with the County prior to issuance of a grading permit; mitigation for impacts to baccharis scrub shall occur at a 1:1 ratio (Table 6) through purchase of 4.9 acres of Diegan coastal sage scrub credits at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit; mitigation for impacts to Engelmann oak woodland shall occur at a 1:1 ratio (Table 6) through purchase of 0.1 acre of Engelmann oak woodland credits at an approved mitigation bank in consultation with the County prior to issuance of a grading permit; mitigation for impacts to coast live oak woodland shall occur at a 1:1 ratio (Table 6) through purchase of 0.1 acre of coast live oak woodland credits at an approved mitigation bank in consultation with the County prior to issuance of a grading permit; mitigation for impacts to southern coast live oak riparian forest shall occur at a 3:1 ratio (Table 6) through purchase of 0.42 acre of southern coast live oak riparian forest credits (0.14 of creation and 0.28 of restoration or enhancement) at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit.

Impact 4.4.2 The proposed Project would impact 0.14 acre of CDFW and County RPO jurisdictional southern coast live oak riparian forest, and 3,702 linear feet (0.24 acre) of CDFW jurisdictional streambed.

MM 4.4.2.a Impacts to CDFW and County RPO jurisdictional southern coast live oak riparian forest shall be mitigated at a 3:1 ratio (Table 6) through purchase of 0.42 acre of southern coast live oak riparian forest credits (0.14 of creation and 0.28 of restoration or enhancement) at an approved mitigation bank in consultation with the County and resource agencies prior to approval of any plan or issuance of any permit.

MM 4.4.2.b Impacts to CDFW jurisdictional streambed shall be mitigated at a 1:1 ratio (Table 6) through purchase of 0.24 acre of mitigation credits through consultation with the CDFW prior to issuance of grading permit.

Implementation of MM 4.4.1 and MM 4.4.2a and b would mitigate for impacts to sensitive habitats.

4.5 CONCLUSIONS

Implementation of the proposed Project would result in significant impacts to sensitive natural communities including jurisdictional areas; however, mitigation measures for loss of habitat resulting from implementation of the potential Project would reduce impact to below a level of significance. Mitigation includes purchase of credits at an approved mitigation bank at ratios consistent with those required by the County and resource agencies.

5.0 JURISDICTIONAL WETLANDS AND WATERWAYS

5.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

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

5.2 ANALYSIS OF PROJECT EFFECTS

Implementation of the proposed Project would affect 3,702 linear feet (0.16 acre) of non-wetland WUS under federal jurisdiction. No wetlands as defined by Section 404 of the Clean Water Act occur on the Project site. Project impacts to non-wetland WUS would result from placement of fill.

5.3 CUMULATIVE IMPACT ANALYSIS

Implementation of the proposed Project would contribute to the cumulative loss of biological resources in San Diego County. The cumulative losses have been addressed by the implementation of the MSCP and General Plan Update EIR. The Project will comply with the requirements of the BMO, RPO, and MSCP.

5.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impact 5.4.1 The proposed project would result in impact to 0.16 acre (3,702 linear feet) of non-wetland WUS.

MM 5.4.1 Mitigation for Project impacts to non-wetland WUS shall occur at a 1:1 ratio in consultation with USACE pursuant to issuance of a permit to place fill in WUS. The Project shall obtain a USACE permit under Section 404 of the Clean Water Act prior to issuance of a grading permit.

5.5 CONCLUSIONS

Implementation of the proposed Project would result in significant impacts to non-wetland WUS; however, mitigation measures as required by USACE would result in no net loss of WUS and thus reduce impacts to WUS to below the level of significance. Mitigation will be approved by USACE.

6.0 WILDLIFE MOVEMENT AND NURSERY SITES

6.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

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 wildlife corridors, or impede the use of native wildlife nursery sites?

Any of the following conditions would be considered significant if:

- A. The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
- B. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.
- C. The project would create artificial wildlife corridors that do not follow natural movement patterns.
- D. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.
- E. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

- F. The project does not maintain adequate visual continuity (i.e., long lines-of-site) within wildlife corridors or linkage.

6.2 ANALYSIS OF PROJECT EFFECTS

The Project site includes no wildlife corridors or significant habitat linkages. Impacts to wildlife movement and nursery sites would be less than significant under the above guidelines for the following reasons:

- 6.1.A Jamul itself is rural but developed, and does not support open space areas contiguous with surrounding undeveloped lands. The site is completely surrounded by chain-link perimeter fencing and has been for some time. The site does not occur within PAMA, nor is it adjacent or contiguous with PAMA, suggesting that corridor/linkage functions were not identified for the site and surrounding area when the PAMA designations were conceptualized and adopted with the MSCP. The site does not consist of and is not located within a block of habitat greater than 500 acres. The site is relatively flat and does not support topographic features typically associated with corridor/linkage areas, such as major ridgelines, steep gullied land, valley floor, or continuous riparian corridor. A portion of the site is identified as Very High habitat value; however, the area does not link significant blocks of habitat. A clear, east-west corridor/linkage through the site does not exist. Land to the east is constrained by existing rural residential development. It is unlikely that large mammals would navigate through the network of non-contiguous, linear patches of undeveloped land situated in-between existing developments. In addition to existing rural residential developments, several major roads occur to the immediate west of the site impeding wildlife movement in the local area. These roads were confirmed by site visits to lack suitable wildlife undercrossings to accommodate unobstructed movement. Therefore, the Project site is an island of undeveloped land surrounded by rural development and does not provide linkage or wildlife movement corridors between adjacent open space areas. Implementation of the proposed Project will not result in any impediment to wildlife use of nursery sites, as suitable native habitat will no longer occur on the Project site and the proposed Project would not separate any existing significant areas of native habitat. Under County Guideline 6.1.A, no significant impact would occur.
- 6.1.B The Project site is not adjacent to any blocks of native habitat, nor does it include any wildlife corridors or habitat linkages. Coastal sage scrub vegetation on the east side of the site continues in the adjacent properties to the east (between olive groves to the north and housing to the south), southeast across Hillside Estates Drive, continuing southward between widely spaced single family residences. Movement of larger animals is likely to occur off site approximately 5 miles to the east through Jamul Mountain to Sequan Peak, a known wildlife corridor (Ogden 1993). Implementation of the proposed Project would not impact local or regional wildlife corridors as the Project site is (1) bounded by SR-94 to the south, Olive Vista Drive to the North, and Jefferson Road to the West, and existing development on all sides, (2) is not adjacent to preserved lands, and (3) the small tributary drainage in the northwest corner of the Project site provides no off-site connection for local corridor movement. As a result, under County Guideline 6.1.B, no significant impact would occur.

- 6.1.C The Project would not create artificial wildlife corridors. No wildlife corridors are included in the proposed Project, and all proposed open space is restricted to the western edge of the Project site. As a result, under County Guideline 6.1.B, no significant impact would occur.
- 6.1.D All proposed Project-related lighting would be required to adhere to Division 9 of the San Diego County Light Pollution Code. Lighting within the proposed development area adjacent to preserved habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat. Under County Guideline 6.1.D, no significant impact resulting from lighting would occur.
- 6.1.E The Project would not reduce an existing wildlife corridor or linkage, or further constrain an already narrow wildlife corridor. As previously stated, the Project site is not adjacent to any wildlife corridor or habitat linkage. The site is bounded by SR-94 to the south, Olive Vista Drive to the North, and Jefferson Road to the West, and existing development on all sides. Under County Guideline 6.1.E, no significant impact would occur.
- 6.1.F The Project would not affect visual continuity within wildlife corridors or linkages. The Project site lies in the center of Jamul, and currently represents the only significant contiguous undeveloped area in the vicinity. Thus, no continuous habitat corridor or linkage spans the Project site. Under County Guideline 6.1.F, no significant impact would occur.

6.3 CUMULATIVE IMPACT ANALYSIS

Implementation of the proposed Project would contribute to the cumulative loss of biological resources in San Diego County. The cumulative losses have been addressed by the implementation of the MSCP and General Plan Update EIR. The Project will comply with the requirements of the BMO, and MSCP.

6.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

No mitigation or design considerations are necessary for proposed Project impacts to wildlife movement corridors or nursery sites.

6.5 CONCLUSIONS

Implementation of the proposed Project would not result in significant impacts to wildlife movement or access to nursery sites.

7.0 LOCAL POLICIES, ORDINANCES, AND ADOPTED PLANS

7.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Would the project conflict with the provisions of an adopted Habitat Conservation Plan (HIP), NCCP plan, or other approved local, regional or state habitat conservation plan?

Any of the following conditions would be considered significant if:

- A. For lands outside of the MSCP, the project would impact coastal sage scrub vegetation in excess of the County's 5 percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- B. The project would preclude or prevent the preparation of the subregional NCCP.
- C. The project will impact any amount of wetlands or sensitive habitat lands as outlined in the RPO.
- D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- E. The project does not conform to goals and requirements outlined in any applicable Habitat Conservation Plan, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort.
- F. For lands within the MSCP, the project would not minimize impacts to Biological Resource Core Areas, as defined in the Biological Mitigation Ordinance (BMO).
- G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- H. The project does not maintain existing movement corridors and/or habitat linkages as defined by the BMO.
- I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- J. The project would reduce the likelihood of survival and recovery of listed species in the wild.
- K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).
- L. The project would result in the take of eagles, eagle eggs, or any part of an eagle (Bald and Golden Eagle Protection Act).

7.2 ANALYSIS OF PROJECT EFFECTS

The following Project effects would be considered significant because one or more of the following guidelines would be met:

- 7.1.C The Project will impact 0.14 acre of southern coast live oak riparian forest considered RPO wetlands. These RPO impacts have been minimized to the maximum extent and impacts remaining are required as necessary improvements to widen Jefferson Road and to replace the existing storm drain inlet, which is currently inadequate. The improvements have been planned within existing easement and right-of-way for the road to the greatest extent possible. Permanent impacts have been minimized to the greatest extent. Impacts are not anticipated to have a substantial adverse effect on the biological functions, values, and services of the existing RPO wetland.

Under existing conditions, Jefferson Road floods and the replacement of two existing 24-inch pipes with three 36-inch pipes to avoid flooding problems is required. In order to access and maintain the drainage facilities, the access road shown on the grading plan is also required. The anticipated improvements would include widening of Jefferson Road and culvert facilities that would span the flood limits of the underlying ephemeral drainage. The improvements would allow for safe mobility over the drainage and improved storm flow beneath the road crossing. The road crossing represents the least environmentally damaging alternative to crossing the drainage and impacts to wetland are necessary and unavoidable. There is no other alternative at the existing drainage crossing due to existing constraints and requirements by the County to provide improvements at this specific location. Additional RPO wetland occurs on both the east and west sides of the Jefferson Road. A clear span bridge would require a much larger construction disturbance footprint resulting in more permanent impacts to the southern coast live oak riparian forest habitat.

The road widening and culvert improvements would provide a superior condition to that which currently exists. The improvements would be restricted to only those necessary to provide a safe crossing and enhance the biological and hydrological functions and services of the reach. The impacts would be primarily temporary for equipment access and staging during construction. Permanent impacts would be limited to removal of a few trees to accommodate construction vehicle access. The impacts are necessary to remove the existing culvert, construct the new road crossing and culvert, stabilize the channel embankment, and restore the riverine hydrology of the reach. Oak trees and other riparian resources would be avoided to the maximum extent possible. Temporary impact areas would be restored to pre-construction contours. Loss of habitat would be compensated in accordance with mitigation measures proposed herein.

There is no Sensitive Habitat Lands under the RPO located onsite. The RPO wetland impacts would be considered significant because County Guideline 7.1C would be met.

- 7.1.K The proposed Project could potentially result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs if clearing and grubbing activities take place in occupied nesting habitat during the avian breeding season.

The proposed Project would not result in significant impacts under the above guidelines for the following reasons:

- 7.1.A The Project site is inside the Metro-lakeside-Jamul segment of the South County MSCP. Therefore, under County Guideline 7.1.A, no significant impact would occur.
- 7.1.B The Project site is inside the MSCP and outside the PAMA and hardline Preserve areas. Implementation of the proposed Project would not interfere with preparation of the subregional NCCP, as that plan is already in place. Under County Guideline 7.1.B, no significant impact would occur.
- 7.1.D The proposed Project includes mitigation measures to fully offset impacts to Diegan coastal sage scrub. The proposed Project will fully comply with the MSCP including mitigating all impacts at specified ratios. Therefore, under County Guideline 7.1.D, no significant impact would occur.
- 7.1.E The proposed Project would conform to goals and requirements outlined in any applicable Habitat Conservation Plan, RMP, Special Area Management Plan, Watershed Plan, or similar regional planning effort. Under County Guideline 7.1.E, no significant impact would occur.
- 7.1.F The Project site does not include any BRCA as defined in the BMO. As stated in Section 1.5.3 the site is not a part of any identified PAMA, or regional linkage or corridor, and supports a majority of medium, low, and agriculture value lands. The site is not part of a block of habitat greater than 500 acres. The site does not support a high number of sensitive species and also does not contain sensitive soils. Based on these factors, the proposed Project site is not considered a BRCA. Under County Guideline 7.1.F, no significant impact would occur.
- 7.1.G The proposed Project would not preclude connectivity between areas of high habitat values. The Project site is bordered on all sides by existing rural development and bound by SR-94 to the south, Olive Vista Drive to the North, and Jefferson Road to the West. The Project is also not subject to the NCCP as it is within the MSCP and subject to the BMO. Under County Guideline 7.1.G, no significant impact would occur.
- 7.1.H The Project site does not include any wildlife movement corridors or habitat linkages. Under County Guideline 7.1.H, no significant impact would occur.
- 7.1.I The Project would not impact core populations of any narrow endemic species as none were observed or detected within the Project site. Under County Guideline 7.1.I, no significant impact would occur.
- 7.1.J No listed species were observed on the Project site. As such, implementation of the proposed Project would not reduce the likelihood of survival and recovery of listed species in the wild. Under County Guideline 7.1.J, no significant impact would occur.
- 7.1.L No golden eagle habitat occurs within the Project boundary and this species was not observed/detected on site during surveys. The site is surrounded by development and has

no mountains or ridges onsite suitable for eagle habitat. The site may be used for foraging habitat although larger more suitable foraging habitat not surrounded by development are located within a 1-2 miles to the north, south, and west. Extensive open space lands associated with the San Diego National Wildlife refuge lie to the west and north; Otay County Open Space Preserve lies to the southwest; and sparse development in Lyons Valley to the east. As such, implementation of the proposed Project would not result in the take of eagles, eagle eggs, or any part of an eagle, as defined by the Bald and Golden Eagle Protection Act. Under County Guideline 7.1.L, no significant impact would occur.

7.3 CUMULATIVE IMPACT ANALYSIS

Implementation of the proposed Project would contribute to the cumulative loss of biological resources in San Diego County. The cumulative losses have been addressed by the implementation of the MSCP. The Project will comply with the requirements of the BMO and MSCP.

7.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impact 7.4.1 The proposed Project would impact 0.14 acre of southern coast live oak riparian forest considered RPO wetlands.

MM 7.4.1 As detailed in MM 4.4.2 impacts to County RPO jurisdictional southern coast live oak riparian forest shall be mitigated at a 3:1 ratio for a total of 0.42 acre of mitigation credits (Table 6) consisting of creation of 0.14 acre of wetland and 0.28 acre restoration or enhancement of existing wetlands in consultation with the County and CDFW prior to issuance of a grading permit.

Impact 7.4.2 The proposed Project could potentially result in the killing of migratory birds or destruction of migratory bird nests and/or chicks, if clearing or grubbing takes place in occupied nesting habitat during the avian breeding season.

MM 7.4.2 No grubbing, clearing, or grading shall occur during the general avian breeding season (February 15 through August 31). As such, all grading permits, improvement plans, and the final map shall state the same. If grubbing, clearing, or grading would occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist 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. 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.

7.5 CONCLUSIONS

Impacts to southern coast live oak riparian forest will be mitigated in conformance with the RPO at a 3:1 ratio as detailed in MM 7.4.1. With implementation of MM 7.4.2 potential impacts to

migratory birds would be avoided. The proposed Project would result in no other impacts to local or regional policies or plans.

8.0 SUMMARY OF PROJECT IMPACTS AND MITIGATION

Implementation of the proposed Project would result in significant impacts to natural communities, jurisdictional wetlands and/or riparian habitats as defined by the USACE, CDFW, and County, and local policies.

Implementation of the proposed Project would result in significant impacts to six sensitive vegetation communities: Diegan coastal sage scrub, baccharis scrub, non-native grassland, Engelmann oak woodland, coast live oak woodland, southern coast live oak riparian forest (Table 6). These impacts would be reduced to below a level of significance through purchase of 90.1 acres of Diegan coastal sage scrub credits for impacts to coastal sage scrub and baccharis scrub, 25.1 acres of non-native grassland credits, 0.1 acre of Engelmann oak woodland credits, and 0.1 acre of coast live oak woodland credits at an approved mitigation bank in consultation with the County and Wildlife Agencies prior to the approval of any plan or issuance of any permit. Southern coast live oak riparian forest considered an RPO impact will be mitigated at a 3:1 ratio for a total of 0.42 acre through purchase of off-site mitigation credits (0.14 creation and 0.28 restoration or enhancement). There will be no net loss of wetlands with the implementation of the proposed mitigation because no wetlands as defined by the USACE and RWQCB occur on the site. The total mitigation purchase or conservation is 120.87 acres.

Additionally, impacts to CDFW jurisdictional streambed also would be mitigated through purchase of appropriate mitigation credits from an approved mitigation bank. Impacts to CDFW jurisdictional streambed shall be mitigated at a 1:1 ratio through purchase of 0.24 acre of Mitigation credits through consultation with the CDFW prior to issuance of a grading permit.

Mitigation for Project impacts to non-wetland WUS shall occur at a 1:1 ratio through purchase of 0.16 acre of non-wetland WUS in consultation with USACE pursuant to issuance of a permit to place fill in WUS. The Project shall obtain a USACE permit under Section 404 of the Clean Water Act prior to issuance of a grading permit.

Construction noise could have a significant effect on sensitive animal species. Avoidance of grubbing and grading during the breeding season and, if warranted, pre-construction surveys would reduce these impacts to below a level of significance.

**Table 6
SUMMARY OF VEGETATION COMMUNITIES, IMPACT, AND MITIGATION
FOR THE SIMPSON FARMS PROJECT**

VEGETATION COMMUNITY/ HABITAT	EXISTING	ON-SITE IMPACTS	OFF-SITE IMPACTS	TOTAL IMPACTS	IMPACT NEUTRAL	MITIGATION		
						Ratio	Required	Provided Off-site
Tier I								
Southern willow scrub (63320)	0.02	--	--	--	0.02	3:1	--	--
Southern coast live oak riparian forest (61310)	0.17	0.07	0.07	0.14	0.10	3:1	0.42	0.42
Engelmann oak woodland (71180)	0.74	0.1	--	0.1	0.64	1:1	0.1	0.1
Coast live oak woodland (71160)	0.08	0.1	--	0.1	0.07	1:1	0.1	0.1
Tier II								
Baccharis scrub (32530)	4.95	4.9	--	4.9	0.05	1:1	4.9	4.9
Diegan coastal sage scrub (32500)	93.14	90.1	--	90.1	3.04	1:1	90.1	90.1
Tier III								
Non-native grassland (42200)	52.43	50.1	--	50.1	2.33	0.5:1	25.1	25.1
Tier IV								
Eucalyptus woodland (79100)	0.12	--	--	--	0.12	--	--	--
Non-native vegetation (11000)	1.54	1.2	--	1.2	0.34	--	--	--
Disturbed habitat (11300)	4.44	4.3	--	4.3	0.14	--	--	--
Developed (12000)	4.37	1.9	<0.1 (0.02)	1.9	2.47	--	--	--
TOTAL	162.00	152.8	0.09	152.8	8.32	--	120.87	120.87
CDFW Jurisdictional Areas								
Streambeds†	0.35	0.24	--	0.24	0.06	1:1	0.24	0.24
Southern coast live oak riparian forest (61310)	0.17	0.07	0.07	0.14	0.03	3:1	0.14	0.14

* Vegetation categories and numerical codes are from Oberbauer (2005)

† CDFW jurisdictional streambeds overlap areas mapped as Diegan coastal sage scrub, eucalyptus woodland, and disturbed habitat; as such, impacts to streambeds are treated separately from the vegetation communities

Implementation of the mitigation measures will reduce impacts to sensitive biological resources to below a level of significance (Table 7).

Table 7 SUMMARY OF MITIGATION MEASURES FOR THE SIMPSON FARMS PROJECT		
PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER
<i>MM 3.4.1.</i> No grading, clearing, or blasting shall occur within 300 ft of occupied Diegan coastal sage scrub during the breeding season of the coastal California gnatcatcher (March 1 – August 15). As such, all grading permits, improvement plans, and the final map shall state the same. If clearing, grading, or blasting would occur during the breeding season for the gnatcatcher, a pre-construction survey shall be conducted to determine if gnatcatchers occur within the areas impacted by noise. To avoid take under the ESA, impacts shall be avoided within 300 feet of nesting gnatcatchers. If there are no gnatcatchers nesting (includes nest building or other breeding/nesting behavior) within this area, grading, clearing, or blasting shall be allowed to proceed. However, if any gnatcatchers are observed nesting or displaying breeding/nesting behavior within the area, construction shall be postponed until all nesting (or breeding/nesting behavior) has ceased or until after August 31.	Not Significant	3.1.A
<i>MM 3.4.2.</i> Mitigation for impacts to non-native grassland shall occur at a 0.5:1 ratio through purchase of 25.1 acres of non-native grassland credit at an approved mitigation bank in consultation with the County prior to approval of any plan or issuance of any permit.	Not Significant	3.1.F
<i>MM 3.4.3.</i> No grubbing, clearing, or grading within 500 feet of active tree-nesting raptor (i.e., Cooper’s hawk) habitat (January 15 to July 15) shall occur. As such, all grading permits, improvement plans, and the final map shall state the same. If grubbing, clearing, or grading would occur during the raptor breeding season, a pre-construction survey shall be conducted to determine if these species occur within the areas impacted by noise. If there are no raptors nesting (includes nest building or other breeding/nesting behavior) within this area, development shall be allowed to proceed. However, if raptors are observed nesting or displaying breeding/nesting behavior within the area, construction shall (1) be postponed until all nesting (or breeding/nesting behavior) has ceased or until after July 15; or (2) a temporary noise barrier or berm shall be constructed at the edge of the development footprint to ensure that noise levels are reduced to below 60 dB or ambient. Alternatively, the use of construction equipment could be scheduled to keep noise levels below 60 dB or ambient in lieu of or in concert with a wall or other noise barrier.	Not Significant	3.1.L

**Table 7 (cont.)
SUMMARY OF MITIGATION MEASURES FOR THE SIMPSON FARMS PROJECT**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER
<p><u>MM 4.4.1.</u> Mitigation for impacts to sensitive habitats shall be provided prior to Final Map recordation and prior to issuance of a grading permit as follows: impacts to Diegan coastal sage scrub shall occur at a 1:1 ratio (Table 6) through purchase of 90.1 acres of Diegan coastal sage scrub credits from an approved mitigation bank in consultation with the County and resource agencies prior to issuance of grading permit; mitigation for impacts to non-native grassland shall occur at a 0.5:1 ratio (Table 6) through purchase of 25.1 acres of non-native grassland credit at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit; mitigation for impacts to baccharis scrub shall occur at a 1:1 ratio (Table 6) through purchase of 4.9 acres of Diegan coastal sage scrub credits at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit; mitigation for impacts to Engelmann oak woodland shall occur at a 1:1 ratio (Table 6) through purchase of 0.1 acre of Engelmann oak woodland credits at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit; mitigation for impacts to coast live oak woodland shall occur at a 1:1 ratio (Table 6) through purchase of 0.1 acre of coast live oak woodland credits at an approved mitigation bank in consultation with the County and resource agencies prior to issuance of a grading permit; mitigation for impacts to southern coast live oak riparian forest shall occur at a 3:1 ratio (Table 6) through purchase of 0.21 acre of southern coast live oak riparian forest credits at an approved mitigation bank in consultation with the County and resource agencies prior to approval of any plan or issuance of any permit.</p>	Not Significant	4.1.A
<p><u>MM 4.4.2.a</u> Impacts to CDFW and County RPO jurisdictional southern coast live oak riparian forest shall be mitigated at a 3:1 ratio through of the creation of 0.14 acre of wetland and 0.28 acre restoration or enhancement of existing wetlands or mitigation credits in consultation with the County and CDFW prior to approval of any plan or issuance of any permit.</p>	Not Significant	4.1.B 7.1.C
<p><u>MM 4.4.2.b</u> Impacts to CDFW jurisdictional streambed shall be mitigated at a 1:1 ratio through purchase of 0.24 acre of Mitigation credits through consultation with the CDFW prior to issuance of a grading permit.</p>	Not Significant	4.1.B

**Table 7 (cont.)
SUMMARY OF MITIGATION MEASURES FOR THE SIMPSON FARMS PROJECT**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER
<i>MM 5.4.1.</i> Mitigation for project impacts to non-wetland WUS shall occur at a 1:1 ratio in consultation with USACE pursuant to issuance of a permit to place fill in WUS. The Project shall obtain a USACE permit under Section 404 of the Clean Water Act prior to issuance of a grading permit.	Not Significant	5.1
<i>MM 7.4.2.</i> No grubbing, clearing, or grading shall occur during the general avian breeding season (February 15 through August 31). As such, all grading permits, improvement plans, and the final map shall state the same. If grubbing, clearing, or grading would occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist 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. 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.	Not Significant	7.1.K

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Appendix A

PLANT SPECIES OBSERVED



Appendix A
PLANT SPECIES OBSERVED – SIMPSON FARMS

<u>FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>	<u>HABITAT[‡]</u>
DICOTS			
Adoxaceae	<i>Sambucus nigra</i> ssp. <i>canadensis</i>	black elderberry	2
Anacardiaceae	<i>Malosma laurina</i>	laurel sumac	1,2
	<i>Rhus ovata</i>	sugar bush	1
	<i>Schinus molle</i> *	Peruvian pepper tree	1,2,6
	<i>Toxicodendron diversilobum</i>	poison oak	5
Apiaceae	<i>Conium maculatum</i> *	poison hemlock	4
	<i>Daucus pusillus</i>	rattlesnake weed	3
	<i>Sanicula arguta</i>	sharp-tooth sanicle	3
Asteraceae	<i>Acourtia microcephala</i>	sacapellote	3
	<i>Artemisia californica</i>	California sagebrush	1,2,3,5
	<i>Baccharis salicifolia</i>	mule fat	3
	<i>Baccharis sarothroides</i>	broom baccharis	1,2,3
	<i>Bahiopsis laciniata</i>	San Diego sunflower	3
	<i>Carduus pycnocephalus</i> *	Italian thistle	1
	<i>Centaurea melitensis</i> *	star thistle	3
	<i>Eriophyllum confertiflorum</i>	golden yarrow	3
	<i>Encelia californica</i>	California encelia	3
	<i>Gutierrezia sarothrae</i>	San Joaquin matchweed	3
	<i>Hazardia squarrosa</i> var. <i>grindelioides</i>	saw-toothed goldenbush	3
	<i>Hypochaeris glabra</i> *	smooth cat's ear	3
	<i>Isocoma menziesii</i>	goldenbush	3
	<i>Lactuca serriola</i> *	wild lettuce	1
	<i>Lasthenia californica</i>	California goldfields	3
	<i>Logfia gallica</i> *	narrow-leaf filago	3
	<i>Pseudognaphalium californicum</i>	California everlasting	3
	<i>Solidago velutina</i>	California goldenrod	4
	<i>Sonchus</i> sp.*	sow thistle	3
	<i>Stylocline</i> sp.	nest straw	3
	<i>Uropappus lindleyi</i>	silver puffs	3
Boraginaceae	<i>Amsinckia intermedia</i>	rancher's fiddleneck	1
	<i>Cryptantha</i> sp.	cryptantha	3
	<i>Pectocarya</i> sp.	pectocarya	3
	<i>Phacelia</i> sp.	phacelia	3
Brassicaceae	<i>Brassica nigra</i> *	black mustard	1
	<i>Hirschfeldia incana</i> *	perennial mustard	3

Appendix A (cont.)
PLANT SPECIES OBSERVED – SIMPSON FARMS

<u>FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>	<u>HABITAT</u> [‡]
DICOTS (cont.)			
Cactaceae	<i>Opuntia</i> sp.*	prickly pear cactus	3
Caprifoliaceae	<i>Lonicera subspicata</i> var. <i>denudata</i>	San Diego honeysuckle	3,5
Caryophyllaceae	<i>Silene gallica</i> *	common catchfly	3
Chenopodiaceae	<i>Chenopodium californicum</i>	California pigweed	3
Convolvulaceae	<i>Calystegia macrostegia</i> <i>Cuscuta californica</i>	morning-glory dodder	3 3
Crassulaceae	<i>Crassula connata</i> <i>Dudleya pulverulenta</i>	pygmy-weed chalk lettuce	3 3
Cucurbitaceae	<i>Marah macrocarpa</i>	wild cucumber	3
Ericaceae	<i>Xylococcus bicolor</i>	mission manzanita	3
Euphorbiaceae	<i>Chamaesyce albomarginata</i> * <i>Croton setigerus</i> <i>Euphorbia pepala</i> *	rattlesnake weed dove weed petty spurge	3 1 3
Fabaceae	<i>Acmispon glaber</i> <i>Acmispon micranthus</i>	deerweed grab lotus	2 3
Fagaceae	<i>Quercus agrifolia</i> var. <i>agrifolia</i> <i>Quercus engelmannii</i> [†]	coast live oak Engelmann oak	4,5,7 3,5
Geraniaceae	<i>Erodium botrys</i> * <i>Erodium cicutarium</i> * <i>Erodium moschatum</i> *	long-beak filaree red-stem filaree green-stem filaree	1,9 3 1
Lamiaceae	<i>Lamium amplexicaule</i> * <i>Marrubium vulgare</i> * <i>Rosmarinus officinalis</i> * <i>Salvia apiana</i> <i>Salvia columbariae</i>	henbit horehound rosemary white sage chia	3 1,2 1 3,5 3
Montiaceae	<i>Claytonia perfoliata</i>	miner's lettuce	3
Myrsinaceae	<i>Anagallis arvensis</i> *	scarlet pimpernel	3
Myrtaceae	<i>Eucalyptus</i> sp.*	eucalyptus	1,8
Nyctaginaceae	<i>Mirabilis laevis</i>	wishbone bush	3
Oleaceae	<i>Olea europaea</i> *	olive	1,3,4,5,6
Onagraceae	<i>Camissoniopsis</i> sp. <i>Epilobium canum</i>	sun cup California fuchsia	3 3
Phrymaceae	<i>Mimulus aurantiacus</i>	monkey-flower	3

Appendix A (cont.)
PLANT SPECIES OBSERVED – SIMPSON FARMS

<u>FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>	<u>HABITAT[‡]</u>
DICOTS (cont.)			
Plantaginaceae	<i>Antirrhinum nuttallianum</i>	Nuttall's snapdragon	3
	<i>Keckiella antirrhinoides</i>	chaparral beard-tongue	3
Polemoniaceae	<i>Eriastrum sapphirinum</i>	wool-star	3
	<i>Navarretia hamata</i>	skunkweed	3
Polygonaceae	<i>Chorizanthe procumbens</i>	prostrate spineflower	1,3
	<i>Eriogonum fasciculatum</i>	buckwheat	1,2,3,5
	<i>Pterostegia drymarioides</i>	California thread-stem	3
Ranunculaceae	<i>Clematis pauciflora</i>	ropevine	3
Rhamnaceae	<i>Rhamnus crocea</i>	spiny redberry	2,3
Rosaceae	<i>Heteromeles arbutifolia</i>	toyon	3,5
Rubiaceae	<i>Galium angustifolium</i>	narrow-leaf bedstraw	3
	<i>Galium aparine</i>	goosegrass	3
Salicaceae	<i>Salix lasiolepis</i>	arroyo willow	3,4
Scrophulariaceae	<i>Scrophularia californica</i>	California figwort	3
Solanaceae	<i>Nicotiana glauca</i> *	tree tobacco	6
	<i>Solanum americanum</i>	white nightshade	3
Tamaricaceae	<i>Tamarix</i> sp.*	tamarisk	3
Urticaceae	<i>Urtica urens</i> *	dwarf nettle	2
MONOCOTS			
Agavaceae	<i>Agave americana</i> *	American agave	3
	<i>Chlorogalum pomeridianum</i>	soap plant	3
	<i>Hesperoyucca whipplei</i>	Our Lord's candle	3
Amaryllidaceae	<i>Narcissus</i> sp.*	daffodil	1
Arecaceae	<i>Washingtonia robusta</i> *	Mexican fan palm	6
Asparagaceae	<i>Asparagus asparagoides</i> *	bridal creeper	1,4,5
Cyperaceae	<i>Carex triquetra</i>	triangular fruited sedge	3,4
Iridaceae	<i>Sisyrinchium bellum</i>	blue-eyed grass	3
Juncaceae	<i>Juncus acutus</i> ssp. <i>leopoldii</i>	spiny rush	3
Liliaceae	<i>Calochortus splendens</i>	lilac mariposa lily	3
Poaceae	<i>Avena</i> sp.	wild oat	3
	<i>Bromus diandrus</i> *	common ripgut grass	3
	<i>Bromus hordeaceus</i> *	soft chess	1,2,3,5,6,8
	<i>Bromus madritensis</i> *	foxtail chess	5
	<i>Festuca myuros</i> *	fescue	3
	<i>Muhlenbergia rigens</i>	deergrass	1

Appendix A (cont.)
PLANT SPECIES OBSERVED – SIMPSON FARMS

<u>FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>	<u>HABITAT</u> [‡]
MONOCOTS (cont.)			
Poaceae	<i>Pennisetum setaceum</i> *	fountain grass	1
	<i>Schismus barbatus</i> *	Mediterranean grass	3
	<i>Stipa pulchra</i>	purple needlegrass	3
Themidaceae	<i>Dichelostemma capitata</i>	blue dicks	3
GYMNOSPERMS			
Cupressaceae	<i>Cupressus sempervirens</i> *	Italian cypress	1
Pinaceae	<i>Pinus</i> sp.*	pine	1,2

*Non-native species

[†]Sensitive species

[‡]Habitats are as follows: 1 – Non-native grassland; 2 – Baccharis scrub; 3 – Diegan coastal sage scrub; 4 – Southern coast live oak riparian forest; 5 – Engelmann oak woodland; 6 – Non-native vegetation; 7 – Coast live oak woodland; 8 – Eucalyptus woodland; 9 – Disturbed habitat



Appendix B

ANIMAL SPECIES OBSERVED



Appendix B
ANIMAL SPECIES OBSERVED – SIMPSON FARMS

<u>ORDER/FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>
INVERTEBRATES		
<u>Butterflies</u>		
Checkerspot	<i>Chlosyne californica</i>	California patch
Blues	<i>Brephidium exila</i> <i>Glaucopsyche lygdamus australis</i> <i>Icaricia acmon acmon</i> <i>Leptotes marina</i>	western pygmy-blue southern blue Acmon blue marine blue
Whites	<i>Anthocharis sara sara</i> <i>A. cethura</i> <i>Pieris rapae</i> <i>Pontia protodice</i>	Sara orangetip desert (Felder's) orangetip cabbage white checkered (common) white
Metalmarks	<i>Apodemia mormo virgulti</i>	Behr's metalmark
Sulphurs	<i>Colias eurytheme</i> <i>Phoebus sennae marcellina</i>	orange sulphur cloudless sulfur
Hairstreaks	<i>C. dumetorum affinis</i> <i>Strymon melinus pudica</i>	bramble (perplexing) hairstreak gray hairstreak
Ladies/Admirals	<i>Adelpha bredowii californica</i> <i>Vanessa annabella</i> <i>V. atalanta rubria</i> <i>V. cardui</i>	California sister west coast lady red admiral painted lady
Swallowtails	<i>P. rutulus</i>	western tiger swallowtail
Skippers	<i>Erynnis funeralis</i> <i>Erynnis tristis</i> <i>Pyrgus albescens</i>	funereal duskywing mournful duskywing white (common) checkered-skipper
Other	<i>Agraulis vanilla</i> <i>Danaus gilippus</i> <i>Euphilotes bernardino</i> <i>Papilio cresphontes</i> <i>Danaus plexippus</i> <i>Junonia coenia grisea</i> <i>Speyeria callippe comstocki</i>	gulf fritillary striated queen San Bernardino blue giant swallowtail monarch common buckeye Comstock's fritillary

Appendix B (cont.)
ANIMAL SPECIES OBSERVED – SIMPSON FARMS

<u>ORDER/FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>
VERTEBRATES		
<u>Birds</u>		
Order Accipitriformes		
Accipitridae	<i>Accipiter cooperi</i> [†]	Cooper's hawk
	<i>Buteo jamaicensis</i>	red-tailed hawk
Cathartidae	<i>Cathartes aura</i> [†]	turkey vulture
Order Apodiformes		
Trochilidae	<i>Calypte anna</i>	Anna's hummingbird
Order Charadriiformes		
Laridae	<i>Larus</i> sp.	unidentified gull
Order Columbiformes		
Columbidae	<i>Columba livia</i>	rock dove
	<i>Zenaida macroura</i>	mourning dove
Order Cuculiformes		
Cuculidae	<i>Geococcyx californianus</i>	greater roadrunner
Order Galliformes		
Odontophoridae	<i>Callipepla californica</i>	California quail
Order Passeriformes		
Aegithalidae	<i>Psaltriparus minimus</i>	bushtit
Corvidae	<i>Aphelocoma californica</i>	western scrub-jay
	<i>Corvus brachyrhynchos</i>	American crow
	<i>Corvus corax</i>	common raven
Emberizidae	<i>Chondestes grammacus</i>	lark sparrow
	<i>Melospiza melodia</i>	song sparrow
	<i>Pipilo crissalis</i>	California towhee
	<i>Pipilo maculatus</i>	spotted towhee
	<i>Zonotrichia leucophrys</i>	white-crowned sparrow
Fringillidae	<i>Carduelis psaltria</i>	lesser goldfinch
	<i>Carpodacus mexicanus</i>	house finch
Hiruninidae	<i>Stelgidopteryx serripennis</i>	northern rough-winged swallow
Mimidae	<i>Mimus polyglottos</i>	northern mockingbird
Parulidae	<i>Setophaga coronata</i>	yellow-rumped warbler
Poliophtilidae	<i>Poliophtila caerulea</i>	blue-gray gnatcatcher
Ptilonotidae	<i>Phainopepla nitens</i>	phainopepla
Sturnidae	<i>Sturnus vulgaris</i>	European starling
Timaliidae	<i>Chamaea fasciata</i>	wrentit
Troglodytidae	<i>Thryomanes bewickii</i>	Bewick's wren
Turdidae	<i>Sialia mexicana</i> [†]	western bluebird
Tyrannidae	<i>Sayornis nigricans</i>	black phoebe
	<i>Tyrannus vociferans</i>	Cassin's kingbird

Appendix B (cont.)
ANIMAL SPECIES OBSERVED – SIMPSON FARMS

<u>ORDER/FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>
VERTEBRATES (cont.)		
Order Piciformes		
Picidae	<i>Picoides nuttallii</i>	Nuttall's woodpecker
 <u>Mammals</u>		
Order Carnivora		
Canidae	<i>Canis latrans</i>	coyote
Procyonidae	<i>Procyon lotor</i>	raccoon
Order Lagomorpha		
Lepidae	<i>Sylvilagus audubonii</i>	desert cottontail
	<i>Lepus californicus bennettii</i> [†]	San Diego black-tailed jackrabbit
Order Rodentia		
Sciuridae	<i>Spermophilus beecheyi</i>	California ground squirrel

[†]Sensitive species

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Appendix C

SENSITIVE PLANT SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR



Appendix C
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Ashy spike-moss	<i>Selaginella cinerascens</i>	--/-- ¹ CNPS List 4.1 ² County List D ³	Prostrate herb. Occurs in rocky, open areas in sage scrub and chaparral. Elevation range 0-1000 ft. No flowering period, as it is not a flowering plant. Above-ground all year.	Present. Found on the site in the north-central portion, mixed with coastal sage scrub.
Blue streamwort	<i>Stemodia durantifolia</i>	--/-- CNPS List 2.2 County List B	Small herb. Occurs in wet sandy areas along small creeks and is an obligate wetland plant. Elevation range 500-3000 ft. Flowering period Jan – Dec.	None. No suitable sandy banks occur in the drainage on the site.
California adder's-tongue fern	<i>Ophioglossum californicum</i>	--/-- CNPS List 4.2 County List D	Small herb. Occurs in grassy, open areas near vernal pools and occasionally in dry, stony areas. Elevation range 0-1000 ft. No flowering season, as it is not a flowering plant. Above-ground Jan – Jun.	Present. Found in the northeastern portion of the site, mixed with coastal sage scrub.
Caraway-leaved gilia	<i>Saltugilia caruifolia</i>	--/-- CNPS List 4.3 County List D	Small herb. Occurs in chaparral and sandy openings in coniferous forest. Elevation range 1000+ ft. Flowering period May – Aug.	None. No suitable chaparral or coniferous forest habitat occurs on the site.
Cooper's rein orchid	<i>Piperia cooperi</i>	--/-- CNPS List 4.2 County List D	Small herb. Occurs in vernal moist areas and in shallow soils adjacent to water courses. Elevation range 0-3000 ft. Flowering period Mar – Jun.	None. No suitable moist stream-side habitat occurs in the drainage on the site.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Dean's milk-vetch	<i>Astragalus deanei</i>	--/-- CNPS List 1B.1 County List A	Herbaceous vine forming a bushy clump. Occurs on dry hillsides in open sage scrub, chaparral, or oak woodland. Elevation range 750-2500 ft. Flowering period Feb – May.	Low. Soils and habitat on the site are suitable, but this species is very rare and known from only a few locations, the closest of which is in Sloane Canyon near Loveland Reservoir 5.5 miles northwest. This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
Engelmann oak	<i>Quercus engelmannii</i>	--/-- CNPS List 4.2 County List D	Large tree. Occurs in oak woodland and mixed chaparral, and occasionally in grassy savannah. Elevation range 500+ ft. Flowering period Mar – Jun, but identifiable year-round by leaves and acorns.	Present. Found on the site in the west-central portion, in riparian woodland and mixed with coastal sage scrub.
Golden daisy	<i>Pentachaeta aurea</i>	--/-- CNPS List 4.2 County List D	Small herb. Occurs in mesic grasslands and sage scrub. Elevation range 0+ ft. Flowers Mar – Jun.	Moderate. Soils and habitat on the site are suitable; however, this species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Graceful tarplant	<i>Holocarpha virgata</i> ssp. <i>elongata</i>	--/-- CNPS List 4.2 County List D	Medium herb. Occurs in grasslands on coastal mesas and in the foothills. Elevation range 0-3000 ft. Flowering period May – Nov.	High. Soils and habitat on the site are suitable.
Large-leaf filaree	<i>California macrophylla</i>	--/-- CNPS List 1B.1 County List B	Small herb. Widespread but locally very rare. Occurs in clay soils in grasslands or openings in sage scrub. Elevation range 0-3000 ft. Flowering period Mar – May.	None. No suitable clay soils occur on the site. This species is known from one location in San Diego County, 22 miles north.
Munz's sage	<i>Salvia munzii</i>	--/-- CNPS List 2.2 County List B	Large shrub. Occurs in chaparral and coastal sage scrub habitat, where it is often dominant when present. Elevation range 0-1000 ft. Flowering period Feb – Apr.	Moderate. Soils and habitat on the site are suitable. This species requires close inspection to distinguish from its common congener (black sage). This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
Orcutt brodiaea	<i>Brodiaea orcuttii</i>	--/-- CNPS List 1B.1 County List A	Small herb. Occurs only on clay soils in vernal moist environments, usually near vernal pools but occasionally near streams. Elevation range 0-5000 ft. Flowering period May – Jul.	None. No suitable clay soils or vernal moist habitat occur on the site.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Palmer's goldenbush	<i>Ericameria palmeri</i> ssp. <i>palmeri</i>	--/-- CNPS List 2.2 County List B	Large shrub. Occurs in coastal drainages, mesic chaparral, and occasionally in coastal sage scrub. Elevation range 0-1500 ft. Flowering period Sep – Nov.	Low. Soils and habitat on the site are suitable but not consistent with prime habitat (drainages and mesic chaparral). Known from two locations on the Sweetwater River within 5 miles west. This species would have been observable during botanical surveys in 2014 if present.
Palmer's grapplinghook	<i>Harpagonella palmeri</i>	--/-- CNPS List 4.2 County List D	Mat-forming herb. Occurs on clay soils in grasslands and coastal sage scrub. Elevation range 0-3000 ft. Flowering period Mar – May.	None. No suitable clay soils occur on the site.
Robinson's peppergrass	<i>Lepidium virginicum</i> var. <i>robinsonii</i>	--/-- CNPS List 1B.2 County List A	Medium herb. Occurs in openings in chaparral and coastal sage scrub. Elevation range 0-5000 ft. Flowering period Jan – Jul.	Moderate. Soils and habitat on the site are suitable. Known from two locations 3.2 miles west. This species would have been observable and was not observed during 2014 rare plant surveys or 2015 QBC surveys.
Rush-like bristleweed	<i>Xanthisma junceum</i>	--/-- CNPS List 4.3 County List D	Medium perennial herb. Occurs in xeric chaparral and coastal sage scrub, on exposed, rocky substrates. Elevation range 500-4000 ft. Flowering period May – Jan.	High. Soils and habitat on the site are suitable. This perennial herb was not observed during 2014 rare plant surveys.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
San Diego ambrosia	<i>Ambrosia pumila</i>	FE/-- CNPS List 1B.1 County List A	Small herb. Occurs in grasslands, valley bottoms and dry drainages, also can occur on slopes, disturbed places, and in coastal sage scrub. Elevation range 650-2000 ft. Flowering period Apr – Oct.	Low. Soils and habitat on the site are suitable; however, this species is very rare and known from fewer than 20 locations. This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
San Diego County needle grass	<i>Stipa diegoensis</i>	--/-- CNPS List 4.2 County List D	Tall bunchgrass. Occurs in chaparral – sage scrub ecotone, usually in fine, silty loam soil. Elevation range 0-3000 ft. Flowering period Feb – Jun.	Low. Soils and habitats on the site are marginally suitable. No areas of native grassland were observed during initial surveys. This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
San Diego goldenstar	<i>Bloomeria clevelandii</i>	--/-- CNPS List 1B.1 County List A	Small herb. Occurs on clay soils in grasslands and coastal sage scrub. Elevation range 0-2000 ft. Flowering period Apr – May.	None. No suitable clay soils occur on the site. The site is north and east of the range of this species in San Diego County.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
San Diego sagewort	<i>Artemisia palmeri</i>	--/-- CNPS List 4.2 County List D	Medium shrub. Occurs along streams in coastal sage scrub and chaparral. Elevation range 0-3000 ft. Flowering period May – Sep, but identifiable year-round by leaves.	Low. Suitable habitat occurs along the drainage in the center-west of the site, but this conspicuous species was not observed during initial biological surveys. This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
San Diego sunflower	<i>Bahiopsis laciniata</i>	--/-- CNPS List 4.2 County List D	Medium shrub. Occurs in coastal sage scrub, often at high density. Elevation range 0-3000 ft. Flowering period Feb – Aug, but identifiable year-round by leaves.	Present. Found in low to moderate numbers throughout the site in coastal sage scrub habitat.
San Diego thorn-mint	<i>Acanthomintha ilicifolia</i>	FT/SE CNPS List 1B.1 County List A	Small herb. Occurs on clay soils near vernal pools and in grassy openings in coastal sage scrub and chaparral. Elevation range 0-3000 ft. Flowering period Apr – Jun.	None. Suitable clay soils do not occur on the site.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Southern California black walnut	<i>Juglans californica</i> var. <i>californica</i>	--/-- CNPS List 4.2 County List D	Large tree. Occurs in deep, alluvial soils with high water retention. Favors creek beds and terraces, and north-facing slopes. Elevation range 0-6000 ft. Flowering period Mar – Jun, but identifiable year-round by foliage and bark.	None. Soils on the site are well-drained and have low water retention capabilities. This conspicuous species would have been observed during initial biological surveys if present. This species would have been observable during botanical surveys in 2014 and QCB surveys in 2015, if present.
Spiny rush	<i>Juncus acutus</i> ssp. <i>leopoldii</i>	--/-- CNPS List 2.2 County List D	Large clump-forming graminoid. Occurs in moist, saline or alkaline soils in coastal salt marshes and riparian alkaline marshes. Elevation range 0-3000 ft. Flowering period May – Jun, but identifiable year-round by leaves and growth habit.	Present. Suitable marsh habitat does not occur on the site; however, a single individual was observed in the central portion of the site.
Spreading navarretia	<i>Navarretia fossalis</i>	--/-- CNPS List 1B.1 County List A	Small herb. Occurs in vernal pools. Elevation range 200-3000 ft. Flowering period Apr – Jun.	None. Suitable vernal pool habitat does not occur on the site.

Appendix C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habit, Ecology and Life History	Potential to Occur
Tecate tarplant	<i>Deinandra floribunda</i>	--/-- CNPS List 1B.2 County List A	Medium herb. Occurs in sandy washes, seeps on dry slopes, or in the high desert. Elevation range 1500 – 3500 ft. Flowering period Aug – Oct.	None. Suitable sandy wash or hillside seep habitat does not occur on the site. This species occurs eastward across the mountains from Tecate to the eastern side of the Laguna Mountains. The closest location is 8 miles east, northeast of Dulzura.
Variegated dudleya	<i>Dudleya variegata</i>	--/-- CNPS List 1B.2 County List A	Small herb. Occurs on clay soils near vernal pools, and on metavolcanic rocky soils in open coastal sage scrub, chaparral, and grasslands. Elevation range 0-3500 ft. Flowering period Apr – Jun.	None. No suitable vernal pool habitat or metavolcanic soils occur on the site. The site is east of the range of this species in San Diego County.
Western dichondra	<i>Dichondra occidentalis</i>	--/-- CNPS List 4.2 County List D	Mat-forming herb. Occurs on sandy banks in coastal sage scrub, chaparral, and oak woodland, often after fire. Elevation range 0-2000 ft. Flowering period Mar – Jul.	Low. Soils and habitat on the site are suitable, but there is no recent history of fire. The site is east of the range of this species in San Diego County. Species was not observed during botanical surveys in 2014 or QCB surveys in 2015.

¹Listing is as follows: F = Federal; S = State of California; E = Endangered; T = Threatened; R = Rare

²CNPS = California Native Plant Society Lists: 1A – presumed extinct; 1B – rare, threatened, or endangered in California and elsewhere; 2 – rare, threatened, or endangered in California but more common elsewhere; 3 – more information needed; 4 – watch list for species of limited distribution. Extension codes: .1 – seriously endangered; .2 – moderately endangered; .3 – not very endangered.

³County of San Diego Sensitive Plant Lists: A – rare, threatened, or endangered in California and elsewhere; B – rare, threatened, or endangered in California but more common elsewhere; C – may be quite rare but need more information; D – limited distribution and may be uncommon, but not presently endangered.



Appendix D

SENSITIVE ANIMAL SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR



Appendix D
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Insects				
Dun skipper	<i>Euphyes vestris harbisoni</i>	--/-- ¹ County Group 1 ²	Riparian habitats and chaparral with narrow canyons or drainages, where perennial sources of water provide adequate habitat for the larval foodplant: San Diego sedge (<i>Carex spissa</i>).	None. Suitable riparian habitat and host plant species do not occur on the site.
Hermes copper	<i>Lycaena hermes</i>	--/-- County Group 1	Southern mixed chaparral and coastal sage scrub at western edge of Laguna mountains. Requires host plant <i>Rhamnus crocea</i> in close proximity to <i>Eriogonum fasciculatum</i> or other nectar sources.	Absent. Suitable host plant associations occur on the site, and the site is within the range of the species in San Diego County. Focused surveys conducted in 2014 demonstrated that the species is currently absent from the site.
Monarch butterfly	<i>Danaus plexippus</i>	--/-- County Group 2	Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Larval host plants consist of milkweeds (<i>Asclepias</i> spp.).	None. Suitable roosting habitat and larval host plant species do not occur on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Insects (cont.)				
Quino checkerspot butterfly	<i>Euphydryas editha quino</i>	FE/-- County Group 1	Sunny openings within chaparral and coastal sage shrublands. Host plants include <i>Plantago erecta</i> , <i>Cordylanthus rigidus</i> , <i>Collinsia</i> spp., <i>Plantago patagonica</i> , <i>Antirrhinum coulterianum</i> , and <i>Castilleja exserta</i> .	Absent. Suitable habitat occurs on the site; however, protocol surveys in 2015 were negative and the overall potential for the species to occur is low.
Reptiles and Amphibians				
Arroyo toad	<i>Bufo microscaphus californicus</i>	FE/SSC County Group 1	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Requires rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	None. No suitable sandy or loose, gravelly stream bank habitats occur on the site.
California red-legged frog	<i>Rana aurora draytoni</i>	FT/SSC County Group 1	Dense, shrubby riparian vegetation with deep, slow-moving water. Readily displaced by introduced aquatic predators, including bullfrogs (<i>Rana catesbiana</i>) or crayfish (<i>Procambarus</i> sp).	None. No suitable riparian habitat or deep, slow-moving water occur on the site.
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	--/SSC County Group 2	Semi-arid brushy areas and chaparral in canyons, rocky hillsides, and plains.	High. Suitable brushy habitat and rocky hillsides occur on the site.
Coastal rosy boa	<i>Lichanura trivirgata roseofusca</i>	--/-- County Group 2	Rocky outcrops in coastal sage scrub, chaparral, and desert scrub.	High. Suitable habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Reptiles and Amphibians (cont.)				
Coastal western whiptail	<i>Aspidoscelis tigris multiscutatus</i>	--/SSC County Group 2	Deserts and semiarid areas with sparse vegetation and open areas, and in woodland and riparian areas. Substrate may be firm soil, sandy, or rocky at surface.	High. Suitable open habitat occurs on the site.
Coronado skink	<i>Eumeces skiltonianus interparietalis</i>	--/SSC County Group 2	Grassland, chaparral, pinyon-juniper and juniper sage woodland, and pine-oak and pine forests.	High. Suitable grassland habitat occurs on the site.
Northern red diamond rattlesnake	<i>Crotalus ruber ruber</i>	--/SSC County Group 2	Chaparral, coastal sage scrub, along creek banks, particularly among rock outcrops or piles of debris with a supply of burrowing rodents for prey.	High. Suitable habitat and prey occur on the site.
Orange-throated whiptail	<i>Aspidoscelis hyperythrus</i>	--/SSC County Group 2	Coastal scrub, chaparral, and valley and foothill hardwood habitats. Prefers washes and sandy areas with patches of brush and rocks. Perennial plants required to support its primary prey termites.	High. Suitable coastal sage scrub habitat occurs on the site.
San Diego banded gecko	<i>Coleonyx variegatus abbottii</i>	--/-- County Group 1	Chaparral and coastal sage scrub in areas with rock outcrops.	Low. Suitable coastal sage scrub and rocky outcrop habitats occur on the site; however, this species is not known from the local area and was not observed or otherwise detected during 2014 and 2015 surveys.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Reptiles and Amphibians (cont.)				
San Diego horned lizard	<i>Phrynosoma coronatum blainvillei</i>	--/SSC County Group 1	Coastal sage scrub and chaparral in arid and semiarid climate conditions.	Low. Suitable coastal sage scrub habitat occurs on the site; however, this species was not observed or otherwise detected during 2014 and 2015 surveys.
San Diego ringneck snake	<i>Diadophis punctatus similis</i>	--/-- County Group 2	Moist habitats such as oak woodlands and canyon bottoms, occasionally grassland, chaparral, and coastal sage scrub.	Low. Some oak woodland habitat occurs on the site, as well as secondary habitats including grassland and coastal sage scrub; however, primary habitat (oak woodland) is of low quality and small area.
Silvery legless lizard	<i>Anniella pulchra pulchra</i>	--/SSC County Group 2	Areas with loose soil, particularly in sand dunes and or otherwise sandy soil. Generally found in leaf litter, under rocks, logs, or driftwood in oak woodland, chaparral, and desert scrub.	None. No suitable sandy soil or leaf litter habitats occur on the site.
Southwestern pond turtle	<i>Clemmys marmorata pallida</i>	--/SSC County Group 1	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation. Requires basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	None. No suitable aquatic habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Reptiles and Amphibians (cont.)				
Western spadefoot toad	<i>Scaphiopus hammondi</i>	--/SSC County Group 2	Burrows in loose soils 1 meter in depth. Requires temporary rainpools and vernal pools (for breeding) lasting three weeks with cool to warm temperatures and absence of predators (crayfish, bullfrogs, etc.).	None. No suitable vernal pool habitat occurs on the site.
Birds				
Bell's sage sparrow	<i>Amphispiza belli belli</i>	BCC/WL County Group 1	Chaparral and sage scrub with modest leaf-litter on the ground (e.g., after a fire or in gabbro-based soil areas).	Low. Coastal sage scrub habitat occurs on the site, but there is no recent history of fire, and soils on the site are not gabbroic.
Burrowing owl	<i>Athene cunicularia</i>	BCC/SSC County Group 1	Grassland or open scrub habitats with sufficient small mammal prey and mammal burrows.	Absent. Suitable grassland habitat and abundant small mammal prey occur on the site; however, protocol-level surveys in 2014 were negative and the overall potential for the species to occur in the future is low.
Coastal California gnatcatcher	<i>Poliophtila californica californica</i>	FT/SSC County Group 1	Coastal sage scrub below 2500 ft in southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	Absent. Suitable coastal sage scrub habitat occurs on the site; however, protocol-level surveys in 2014 were negative. This species has a moderate potential to move onto the site in the future.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Birds (cont.)				
California gull	<i>Larus californicus</i>	--/WL County Group 2	Coastal areas and lakes.	None. No suitable aquatic habitat occurs on the site.
Cooper's hawk	<i>Accipiter cooperi</i>	--/SSC County Group 1	(Nesting) Open, uninterrupted, or marginal woodland. Nest sites mainly found in riparian growths of deciduous trees, live oaks.	Present. Observed on the site during initial biological surveys.
Ferruginous hawk	<i>Buteo regalis</i>	BCC/WL County Group 1	Open grasslands.	Low. Suitable open grassland habitat occurs on the site; however, this species was not observed or otherwise detected during 2014 and 2015 surveys.
Golden eagle	<i>Aquila chrysaetos</i>	--/FP County Group 1	(Nesting and Wintering) Rolling foothills and mountain areas, juniper-sage flats, and deserts. Primarily associated with cliff-walled canyons and large trees in open habitats for nesting.	None. No suitable nesting habitat occurs on the site. The site does not contain mountain areas or large trees for nesting. The site is surrounded by development on all sides not preferred by this species.
Grasshopper sparrow	<i>Ammodramus savannarum</i>	--/SSC County Group 1	Grasslands.	High. Suitable grassland habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Birds (cont.)				
Great blue heron	<i>Ardea herodias</i>	--/-- County Group 2	Wetland habitats, but can be observed foraging away from water.	Low. No suitable wetland habitat occurs on the site. Transient individuals possible, given the proximity of the Sweetwater River to the north and west.
Horned lark	<i>Eremophila alpestris actis</i>	--/WL County Group 2	Coastal strand, arid grasslands, and sandy desert floors.	Low. Grassland habitat on the site is not consistent with arid grasslands typically used by this species.
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE/CE County Group 1	Summer resident of Southern California in low riparian areas in the vicinity of water or in dry river bottoms below 2,000 ft. Nests places along the margins of bushes or on twigs projecting into pathways.	Low. Not likely to occur, no suitable nesting or foraging habitat occurs onsite. The site occurs well above the species known elevation limits for breeding sites.
Loggerhead shrike	<i>Lanius ludovicianus</i>	BCC/SSC County Group 1	Grassland, open sage scrub, chaparral, and desert scrub.	Low. Marginal grassland and scrub habitat occurs on the site; however, this species was not observed or otherwise detected during 2014 and 2015 surveys.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Birds (cont.)				
Long-eared owl	<i>Asio otus</i>	--/SSC County Group 1	Oak woodlands and riparian forests in proximity to open foraging habitat.	Low. Oak woodland, riparian forest, and grassland habitats occur on the site, but oak woodland and riparian forest habitats are of low quality and small size.
Northern harrier	<i>Circus cyaneus hudsonius</i>	--/SSC County Group 1	Coastal salt and freshwater marsh. Nests and forages in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Low. No suitable wetland habitat occurs on the site. Transient individuals possible, given the proximity of the Sweetwater River to the north and west.
Prairie falcon	<i>Falco mexicanus</i>	--/-- County Group 1	Inhabits dry, open terrain, either level or hilly.	Low. Suitable dry, open habitat occurs on the site; however, this species was not observed or otherwise detected during 2014 and 2015 surveys. This species could forage over the site.
Red-shouldered hawk	<i>Buteo lineatus</i>	--/-- County Group 1	Riparian woodland, oak woodland, orchards, eucalyptus groves, or other areas with tall trees.	High. Suitable eucalyptus and oak woodland habitats occur on the site.
Rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	--/-- County Group 1	Found in coastal sage scrub and sparse mixed chaparral.	High. Suitable coastal sage scrub habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Birds (cont.)				
Sharp-shinned hawk	<i>Accipiter striatus</i>	--/WL County Group 1	Usually observed in areas with tall trees or other vegetative cover but can be observed in a variety of habitats.	Low. Tall eucalyptus trees occur on the site; however, this species was not observed or otherwise detected during 2014 and 2015 surveys.
Southwestern willow flycatcher	<i>Empidonax trailii extimus</i>	FE/SE County Group 1	Breeds within thickets of willows or other riparian understory usually along streams, ponds, lakes, or canyons. Migrants may be found among other shrubs in wetter areas.	None. No suitable dense willow scrub habitat occurs on the site.
Tricolored blackbird	<i>Agelaius tricolor</i>	--/SSC County Group 1	Requires open water, protected nesting substrate, and foraging area with available insect prey.	None. No suitable open-water habitat occurs on the site.
Turkey vulture	<i>Cathartes aura</i>	--/-- County Group 2	Found in open country, woodlands, and near farms.	Present. Observed soaring over the site during initial biological surveys.
Western bluebird	<i>Sialia mexicana</i>	--/-- County Group 2	Open coniferous and deciduous woodlands, wooded riparian areas, grasslands, farmlands, and edge of burned areas. Prefers open forest habitats. Nests in cavities in trees and snags, or between bark and trunk. Uses nest boxes.	Present. Suitable grassland and farmland habitats occur on the site.
White-tailed kite	<i>Elanus leucurus</i>	--/FP County Group 1	Riparian woodlands and oak or sycamore groves adjacent to grassland.	Low. Oak riparian habitat on the site is of low quality and small size.
Yellow warbler	<i>Dendroica petechia brewsteri</i>	--/SSC County Group 2	Riparian woodland.	None. Riparian habitat on the site is not suitable for this species.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Birds (cont.)				
Yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FC/SE County Group 1	Extensive stands of mature riparian woodland.	None. Riparian habitat on the site is not suitable for this species.
Yellow-breasted chat	<i>Ictera virens</i>	--/SSC County Group 1	Mature riparian woodland.	None. Riparian habitat on the site is not suitable for this species.
Mammals				
American badger	<i>Taxidea taxus</i>	--/SSC County Group 2	Open plains and prairies, farmland, and sometimes edges of woods.	Low. Suitable open grassland and farmland habitat occurs on the site. This species was not observed or otherwise detected during 2014 and 2015 surveys. The site is likely too disturbed and too close to existing residential areas to support this species.
Big free-tailed bat	<i>Nyctinomops macrotis</i>	--/SSC County Group 2	Rocky areas, in day they roost in rocky cliffs, sometimes caves, buildings, or tree holes.	Low. Suitable cliff habitat for roosting does not occur on the site, but buildings and trees are present.
California leaf-nosed bat	<i>Macrotus californicus</i>	--/SSC County Group 2	Desert scrub; by day, abandoned mine tunnels.	None. No suitable foraging or roosting habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Mammals (cont.)				
Dulzura California pocket mouse	<i>Chaetodipus californicus femoralis</i>	--/SSC County Group 2	Variety of habitats including coastal scrub, chaparral, and grasslands in San Diego County. Associated with grass-chaparral edges.	Low. Suitable grassland and coastal sage scrub habitat occurs on the site. No sign of pocket mouse was observed during 2014 and 2015 surveys.
Greater western mastiff bat	<i>Eumops perotis californicus</i>	--/SSC County unlisted	Lower and upper Sonoran desert scrub near cliffs, preferring rugged rocky canyons with abundant crevices. Prefers crowding into tight crevices.	None. No suitable cliff or rocky canyon habitat occurs on the site.
Long-eared myotis	<i>Myotis evotis</i>	--/-- County Group 2	Found in all brush, woodland and forest habitat from sea level to about 9,000 ft. Prefers coniferous woodlands and forests.	Low. No suitable roosting habitat occurs. This species prefers habitats absent from this site. Marginal foraging habitat exists; however, this species is not likely to forage over this site.
Mexican long-tongued bat	<i>Choeronycteris mexicana</i>	--/SSC County Group 2	Arid scrub, mixed forest, and canyons in mountain ranges rising from the desert. By day, usually in caves and mines, but sometimes in buildings.	None. No suitable arid scrub or canyon habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Mammals (cont.)				
Mountain lion	<i>Felis concolor</i>	--/-- County Group 2	Rocky areas, cliffs, and ledges that provide cover within open woodlands and chaparral, as well as riparian areas that provide protective habitat connections for movement between fragmented core habitat. Also, need both vertical and horizontal cover components, such as rocks and downed logs, to feel secure enough to bed.	Low. No suitable cliff, ledge, or extensive riparian habitat occurs on the site. Also, the immediate area, though rural, is developed. Transient individuals possible, given the regional setting and proximity of large tracts of open space to the east and west of Jamul.
Northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	--/SSC County Group 2	Open areas of coastal sage scrub and weedy growth, often on sandy substrates.	Low. Suitable coastal sage scrub and weedy habitats occur on the site. No sign of pocket mouse was observed during 2014 and 2015 surveys.
Pallid bat	<i>Antrozous pallidus</i>	--/SSC County Group 2	Rocky, mountainous areas and near water; also found over more open, sparsely vegetated grasslands, and prefers foraging in the open. Uses three different roosts: 1) the day roost is in a warm, horizontal opening such as rock cracks; 2) the night roost is in the open, near foliage; and 3) the hibernation roost, which is in caves or cracks in rocks.	Low. Rocky terrain and grasslands occur on the site, but the site is not mountainous, nor is open water available.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Mammals (cont.)				
Pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	--/SSC County Group 2	Semiarid desert lands. Day-roosts in caves, crevices in cliffs, and under the roof tiles of buildings. Uses a variety of arid habitats in southern California: pine-juniper woodlands, desert scrub, palm oases, desert wash, desert riparian, etc. Prefers rocky areas with high cliffs.	None. Suitable desert habitats do not occur on the site.
Ringtail	<i>Bassariscus astutus</i>	--/-- County Group 2	Various riparian habitats and in brush stands of moist forest and shrub habitats at low to middle elevations. Less common in wooded areas with hollow trees, sometimes around buildings.	Absent. Riparian habitat on the site is of low quality and small size. This species was not observed or otherwise detected during 2014 and 2015 surveys and is not likely to occur due to its restrictive range and high sensitivity to disturbance. This species is presumed to be absent.
San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	--/SSC County Group 2	Primarily in open habitats including coastal sage scrub, chaparral, grasslands, croplands, and open, disturbed areas if there is at least some shrub cover present.	Present. Suitable coastal sage scrub and grassland habitats occur on the site. Observed in the southern portion of the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Mammals (cont.)				
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	--/SSC County Group 2	Open chaparral and coastal sage scrub, often building large, stick nests in rock outcrops or around clumps of cactus or yucca.	Absent. Suitable coastal sage scrub habitat with large rock outcrops occurs on the site. This species and its sign was not observed or otherwise detected during 2014 and 2015 surveys.
Small-footed myotis	<i>Myotis ciliolabrum</i>	--/-- County Group 2	Wide range of habitats mostly arid wooded and brushy uplands near water. Seeks cover in caves, buildings, mines and crevices. Prefers open stands in forests and woodlands. Requires drinking water. Feeds on a wide variety of small flying insects.	Low. Suitable brushy upland habitat occurs on the site; however, open water is not available.
Small-footed myotis (cont.)				
Southern grasshopper mouse	<i>Onychomys torridus ramona</i>	--/SSC County Group 2	Arid habitats including various types of scrublands, low desert with creosote bush, mesquite, and yucca.	None. No suitable desert scrub habitat occurs on the site.

Appendix D (cont.)
SENSITIVE ANIMAL SPECIES POTENTIAL TO OCCUR – SIMPSON FARMS

Common Name	Species Name	Status	Habitat Associations	Potential to Occur
Mammals (cont.)				
Southern mule deer	<i>Odocoileus hemionus</i>	--/-- County Group 2	Mule deer occupy to some extent almost all types of habitat within their range but, in general, they seem to prefer the more arid, open situations	Low. Suitable open habitat occurs on the site, and the rural setting is appropriate for this species. No sign of this species was observed during 2014 and 2015 surveys. This species has a low potential to move through the general area, although existing perimeter chain-linked fence would prohibit movement to and from the site.
Spotted bat	<i>Euderma maculatum</i>	--/SSC County Group 2	Mountainous regions with ponderosa pines. Roosts in crevices in cliffs and canyons.	None. No suitable mountainous terrain occurs on the site, nor does ponderosa pine.
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	--/SSC County Group 2	Open pasture and forest canopy. Hibernates and breeds in caves and shelters.	Low. Suitable open pasture habitat occurs on the site, but forest habitat is of low quality and small size.
Western red bat	<i>Lasiurus blossevillii</i>	--/-- County Group 2	Riparian areas dominated by cottonwoods, oaks, sycamores, and walnuts.	None. Suitable mixed riparian forest habitat does not occur on the site.
Yuma myotis	<i>Myotis yumanensis</i>	--/-- County Group 2	Open water near woodlands and forests. Also uses caves and mines.	None. Open water is not available on the site.

¹Listing codes are as follows: FE = Federally Endangered; FT = Federally Threatened; BCC = Birds of Conservation Concern; SE = State of California Endangered; FP = State of California Fully Protected; WL = State of California Wait-Listed; SSC = State of California Species of Special Concern.

²County of San Diego Sensitive Animal List: Group 1 = Animals that have a very high level of sensitivity, either because they are listed as threatened or endangered or because they have very specific natural history requirements that must be met; Group 2 = 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.

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Appendix E

REPRESENTATIVE PHOTOGRAPHS





Photo 1: Representative photo of Diegan coastal sage scrub in the eastern half of the site.
Photo taken on January 2, 2014



Photo 2: Representative photo of non-native grassland in the western half of the site.
Photo taken on January 2, 2014

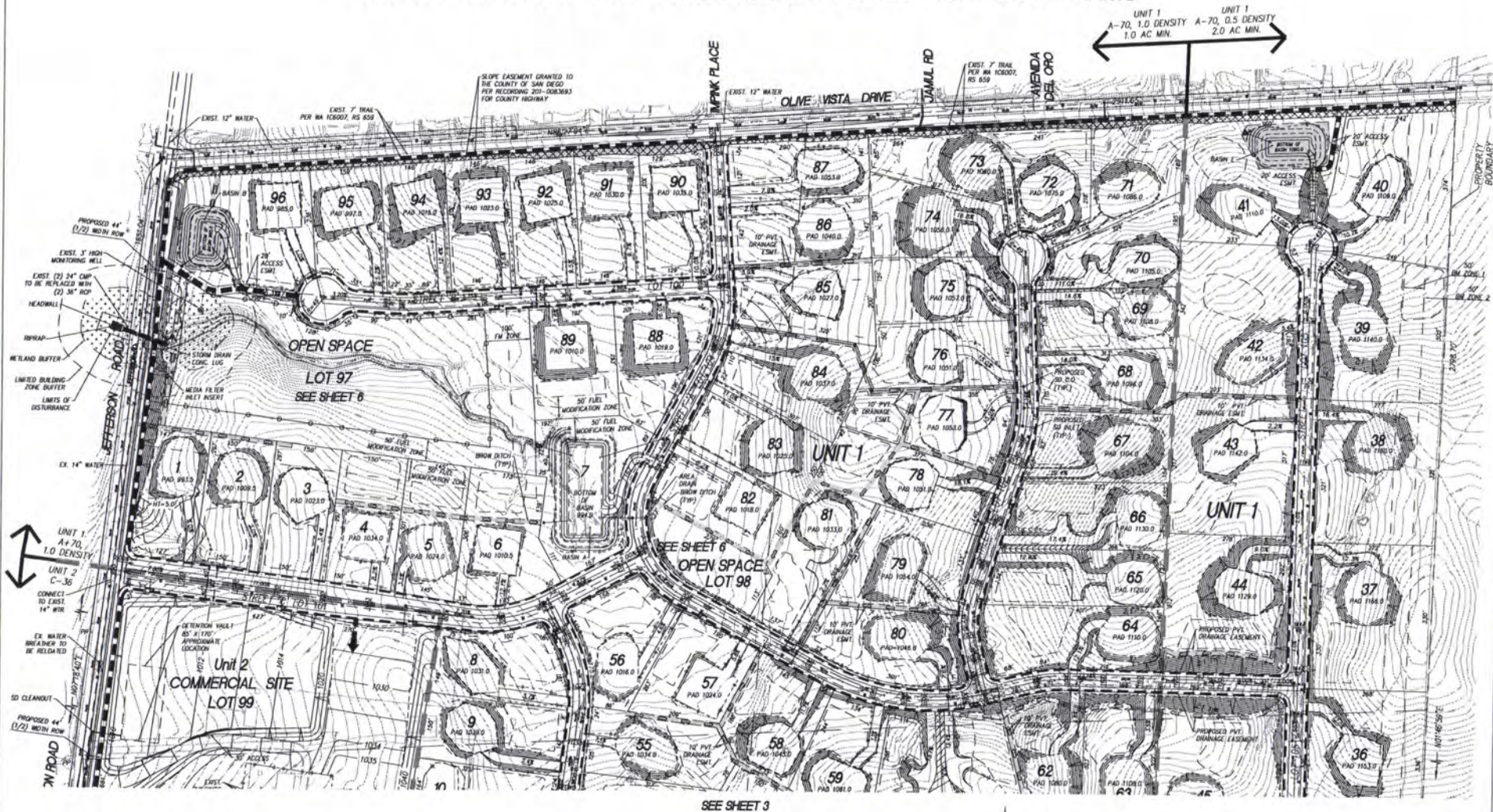


Photo 3: Representative photo of disturbed habitat in northern portions of the site.
Photo taken on January 2, 2014



Photo 4: Typical ephemeral drainage feature situated within upland landscape position
in eastern half of the site. Photo taken on April 14, 2014.

TENTATIVE MAP FOR:
 COUNTY OF SAN DIEGO TRACT No. 5460 RPL2 - "SIMPSON FARMS"



UNIT 1
 A-70, 1.0 DENSITY
 1.0 AC MIN.

UNIT 1
 A-70, 0.5 DENSITY
 2.0 AC MIN.

SEE SHEET 3

SEE SHEET 6

OPEN SPACE
 LOT 97
 SEE SHEET 6

OPEN SPACE
 LOT 98

Unit 2
 COMMERCIAL SITE
 LOT 99



TENTATIVE MAP FOR:
 COUNTY OF SAN DIEGO TRACT No. 5460 RPL2
 "SIMPSON FARMS"

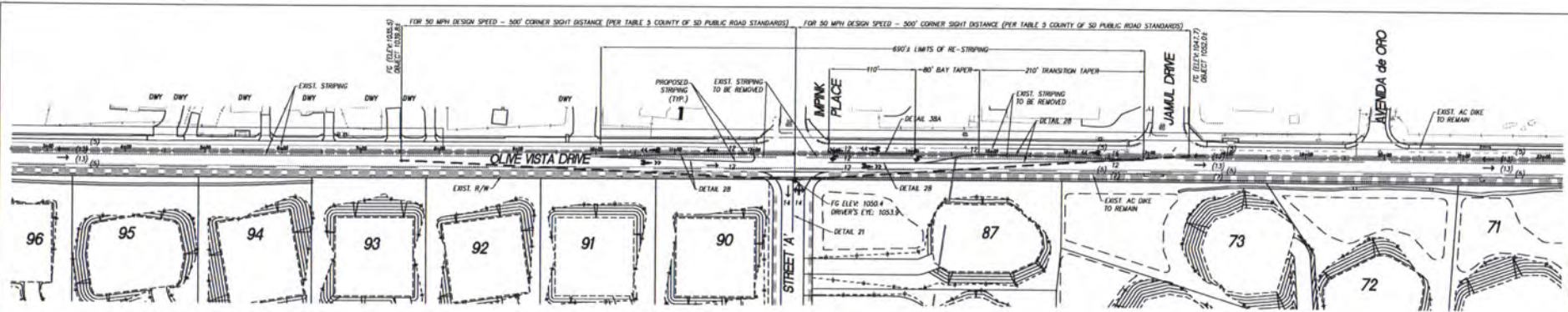
PROJECT DESIGN CONSULTANTS
 Planning | Landscape Architecture | Engineering | Survey

101 S. Main, Suite 800
 San Diego, CA 92101
 PH: 619.594.1100
 FAX: 619.594.1100

PROJECT DESIGN CONSULTANTS
 619.235.8477

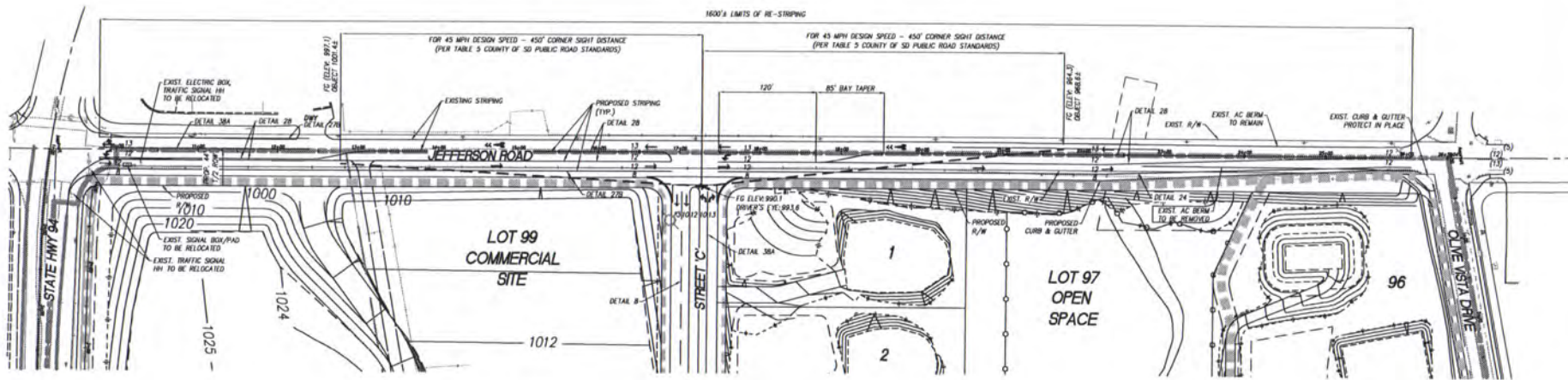
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2ND SUBMITTAL - XX/XX/2015



OLIVE VISTA DRIVE

SIGHT DISTANCE and STRIPING (EXISTING POSTED SPEED = 45 MPH)
 PER THE TRAFFIC STUDY: OLIVE VISTA DRIVE WESTBOUND 85TH PERCENTILE SPEED = 48.5 MPH PER THE
 TRAFFIC STUDY: OLIVE VISTA DRIVE EASTBOUND 85TH PERCENTILE SPEED = 42.8 MPH



JERRERSON ROAD

SIGHT DISTANCE and STRIPING (EXISTING POSTED SPEED = 40 MPH)
 PER THE TRAFFIC STUDY: JEFFERSON ROAD SOUTHBOUND 85TH PERCENTILE SPEED = 41.4 MPH
 PER THE TRAFFIC STUDY: JEFFERSON ROAD NORTHBOUND 85TH PERCENTILE SPEED = 40.3 MPH

LEGEND

- LINE OF SIGHT - - - - -
- DIRECTIONAL ARROW ->
- SHARED LANE <->
- TRAIL [Symbol]

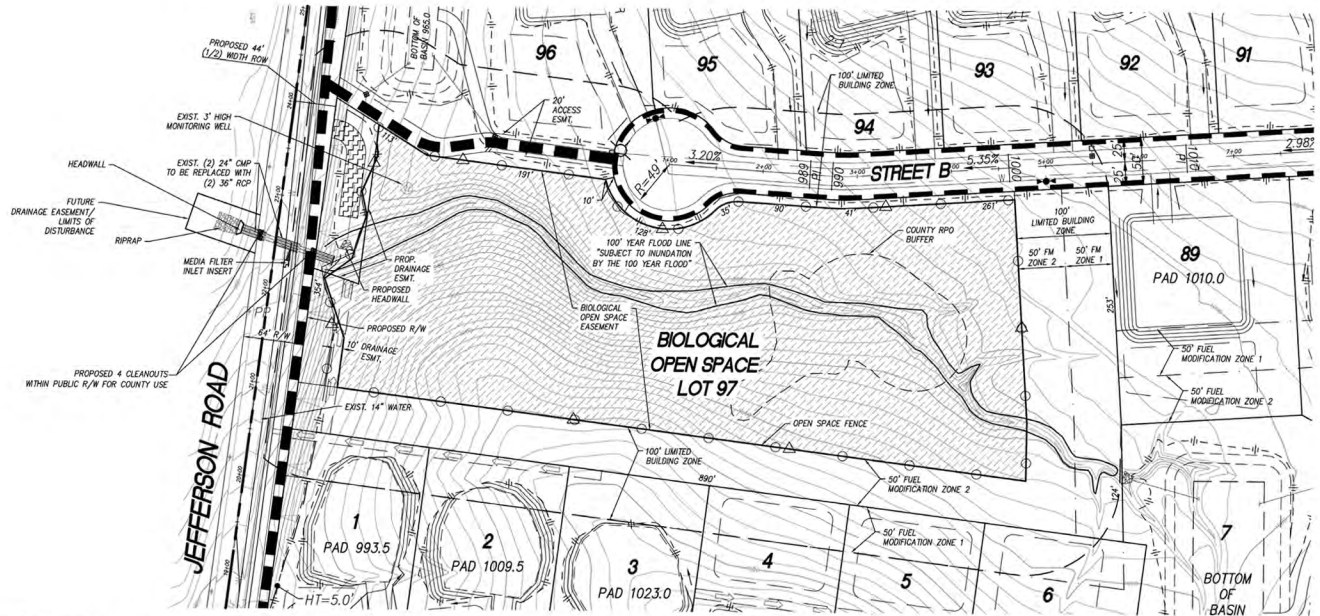


TENTATIVE MAP FOR:
 COUNTY OF SAN DIEGO TRACT No. 5460 RPL2
 'SIMPSON FARMS'

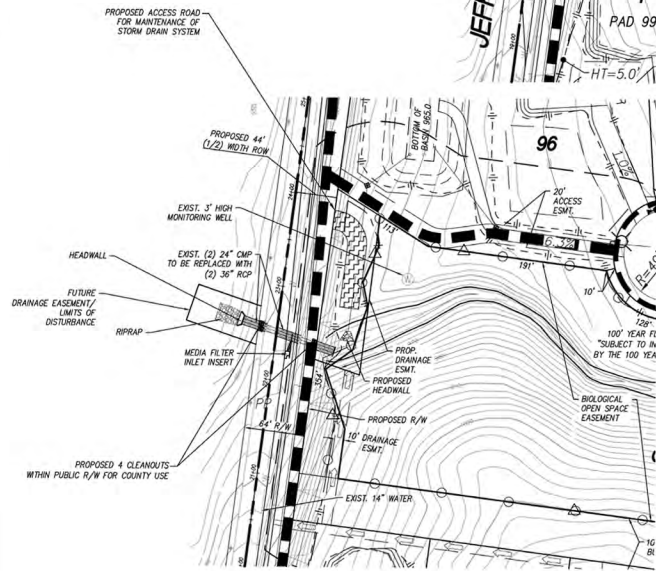
PROJECT DESIGN CONSULTANTS
 Planning | Landscape Architecture | Engineering | Survey

101 S Street, Suite 200
 San Diego, CA 92101
 619.235.8477
 www.pdc.com

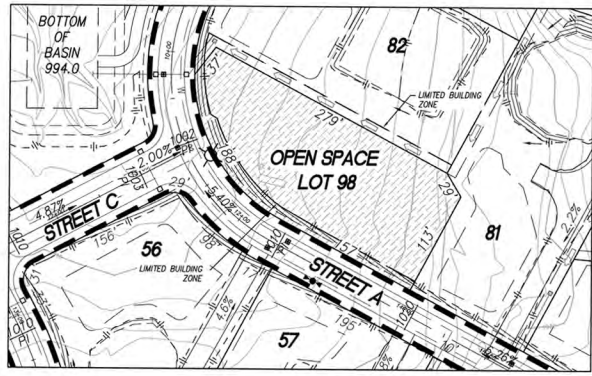
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LOT 97-OPEN SPACE



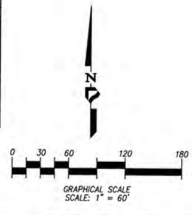
DETAIL A



LOT 98-OPEN SPACE

LEGEND

- SPLIT RAIL FENCING
 - INDICATES OPEN SPACE
 - SIGNAGE (3" x 9" WITH 3" MIN. HIGH POST)
- SENSITIVE ENVIRONMENTAL RESOURCES
AREA RESTRICTED BY EASEMENT**
- Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions, contact the County of San Diego, Planning Development Services Reference: PDS2005-3100-5460



TENTATIVE MAP FOR:
COUNTY OF SAN DIEGO TRACT No. 5460 RPL2
'SIMPSON FARMS'

PROJECT DESIGN CONSULTANTS
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619.236.0569 FX

2ND SUBMITTAL - XX/XX/2015

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619.236.6477

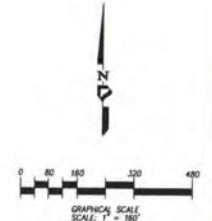
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TENTATIVE MAP FOR: COUNTY OF SAN DIEGO TRACT No. 5460 RPL2 - "SIMPSON FARMS"



- ### EASEMENTS/ENCUMBRANCES
- 1 RIGHTS OF THE PUBLIC TO ANY PORTION OF THE LAND LYING WITHIN THE AREA COMMONLY KNOWN AS CAMPO ROAD.
 - 2 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: THE COUNTY OF SAN DIEGO
 PURPOSE: PUBLIC ROAD
 IN BOOK 255, PAGE 4 OF DEEDS
 RECORDED: THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD
 AFFECTS:
 - 3 SUCH RIGHTS AS MAY EXIST IN A ROAD OVER THAT PORTION OF THE HEREIN DESCRIBED LAND LYING WITHIN OLD ROAD SURVEY NOS. 72 AND OF ROUTE 76, DIVISION NO. 2 AS SHOWN ON MAP ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY.
 - 4 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: THE COUNTY OF SAN DIEGO
 PURPOSE: ROAD PURPOSES
 AS 1/2, 1928 IN BOOK 1483, PAGE 419 OF DEEDS
 RECORDED: THE ROUTE THEREOF AFFECTS A PORTION OF SAID LAND AND IS MORE FULLY DESCRIBED IN SAID DOCUMENT
 AFFECTS:
 - 5 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: THE COUNTY OF SAN DIEGO
 PURPOSE: PUBLIC HIGHWAY
 RECORDED: DECEMBER 26, 1940 AS DOCUMENT NO. 87245 IN BOOK 1192, PAGE 6 OF OFFICIAL RECORDS
 AFFECTS: PARCELS 1 AND 2 (ROAD SURVEY 658)
 - 6 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: SAN DIEGO GAS & ELECTRIC COMPANY
 PURPOSE: PUBLIC UTILITIES, INGRESS AND EGRESS
 RECORDED: OCTOBER 1, 1979 AS FILE NO. 79-409106, OFFICIAL RECORDS
 AFFECTS: THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD
 - 7 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: SAN DIEGO GAS & ELECTRIC COMPANY
 PURPOSE: PUBLIC UTILITIES, INGRESS AND EGRESS
 RECORDED: NOVEMBER 25, 1980 AS FILE NO. 80-397825, OFFICIAL RECORDS
 AFFECTS: THE ROUTE THEREOF AFFECTS A PORTION OF SAID LAND AND IS MORE FULLY DESCRIBED IN SAID DOCUMENT
 - 8 AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT.
 GRANTED TO: COUNTY OF SAN DIEGO
 PURPOSE: COUNTY HIGHWAY
 RECORDED: FEBRUARY 18, 1950
 RECORDING NO.: 2900-0080845 OF OFFICIAL RECORDS
 AFFECTS: OLIVE VISTA DRIVE

- ### LEGEND
- DRAINAGE EASEMENT
 - TRAIL EASEMENT
 - SLOPE/DRAINAGE EASEMENT
 - RIGHT-OF-WAY DEDICATION

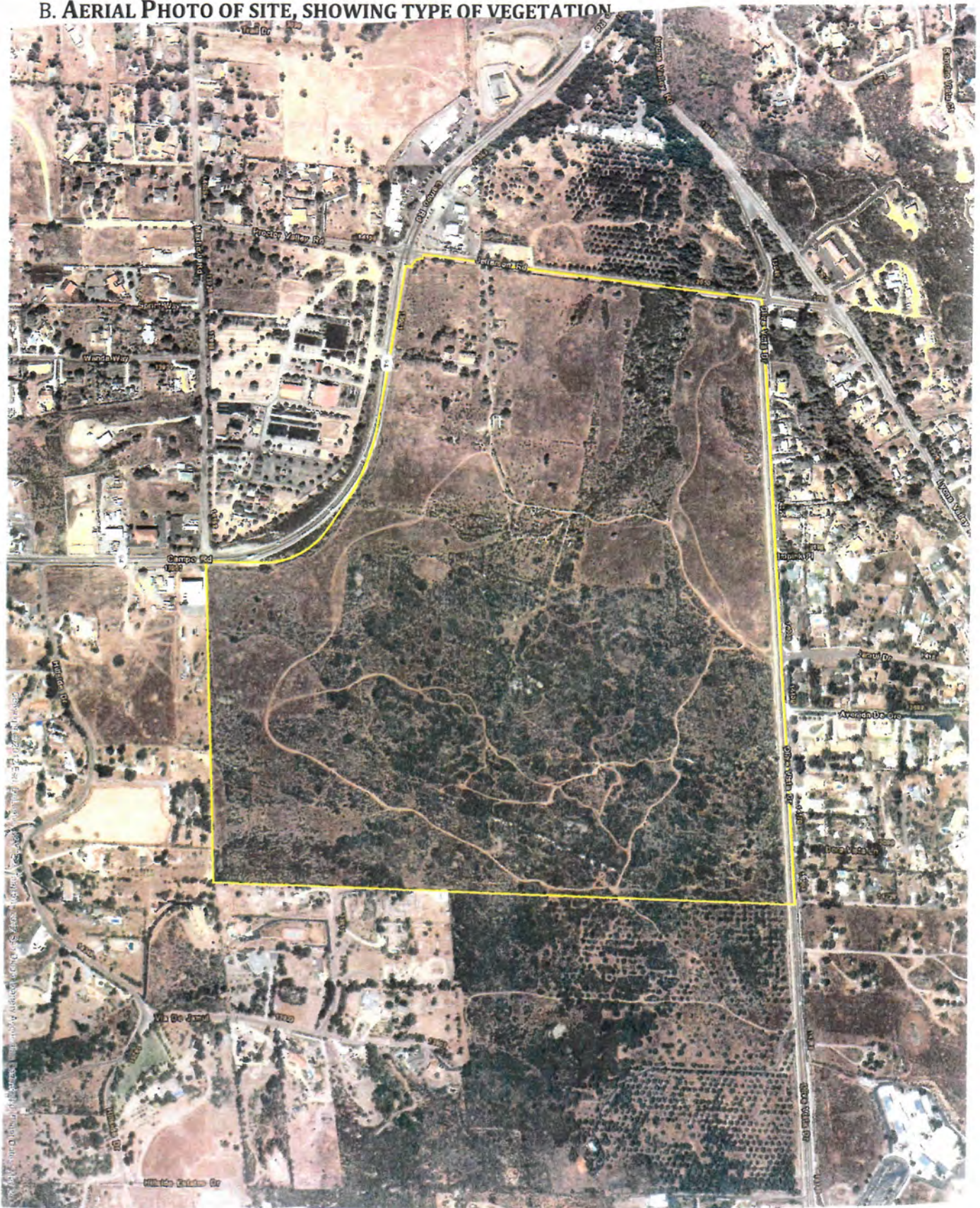


TENTATIVE MAP FOR:
COUNTY OF SAN DIEGO TRACT No. 5460 RPL2
"SIMPSON FARMS"

PROJECT DESIGN CONSULTANTS
 Planning | Landscape Architecture | Engineering | Survey

701 B Street, Suite 200
San Diego, CA 92101
619.594.1171
P.O. Box 108870

B. AERIAL PHOTO OF SITE, SHOWING TYPE OF VEGETATION



C. GROUND LEVEL PHOTOS OF SITE



GROUND LEVEL PHOTOS OF SITE



ON SITE VEGETATION BY TYPE

BACCHARIS SCRUB



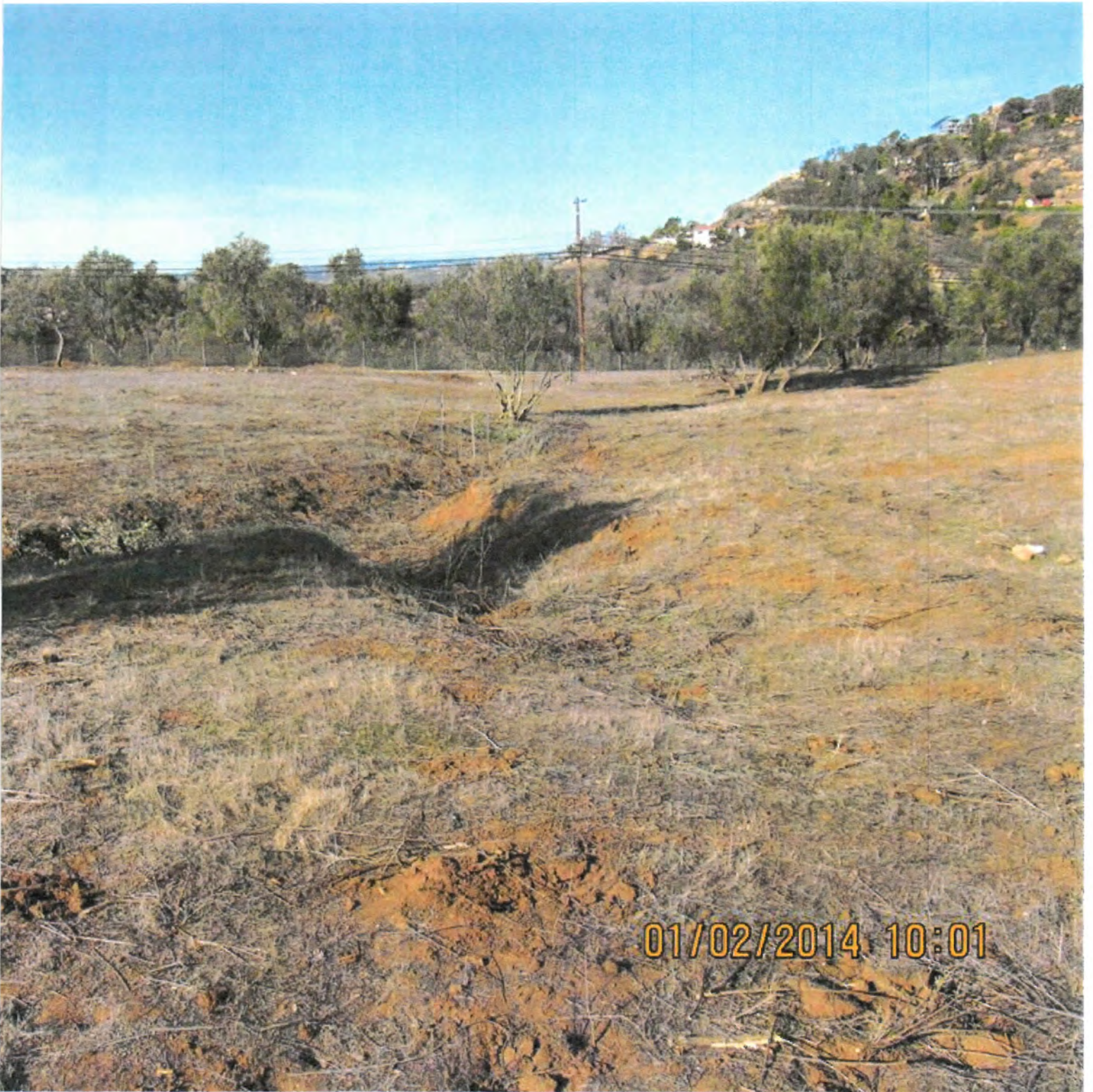
COASTAL LIVE OAK RIPARIAN FOREST



DISTURBED HABITAT



NON- NATIVE GRASSLAND



COASTAL SAGE



Conceptual Fire Protection Plan; Simpson Farms; rev. 4-8-15

D. FORM PDS # 399F; PROJECT AVAILABILITY FORM FOR FIRE PROTECTION:



County of San Diego, Planning & Development Services
PROJECT FACILITY AVAILABILITY - FIRE
ZONING DIVISION

Please type or use pen

4 DWW, LLC (958) 863-0906
 Owner's Name Phone
 7850 IVANHOE AVE
 Owner's Mailing Address Street
 LA JOLLA CA 92037
 City State Zip

ORG _____
 ACCT _____
 ACT _____
 TASK _____
 DATE _____ AMT \$ _____

F

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION

TO BE COMPLETED BY APPLICANT

- A. Major Subdivision (TM) Specific Plan or Specific Plan Amendment
 Minor Subdivision (TPM) Certificate of Compliance: _____
 Boundary Adjustment
 Rezone (Reclassification) from _____ to _____ zone.
 Major Use Permit (MUP), purpose: _____
 Time Extension... Case No. _____
 Expired Map... Case No. _____
 Other _____
- B. Residential Total number of dwelling units 96
 Commercial Gross floor area _____
 Industrial Gross floor area _____
 Other Gross floor area _____
- C. Total Project acreage 164 Total lots 104 Smallest proposed lot 1 acre

Assessor's Parcel Number(s)
 (Add extra if necessary)

596-180-01,02	

Thomas Guide. Page _____ Grid _____
 Intersection of SR-94 & Jefferson
 Project address Street
JAMUL 91935
 Community Planning Area/Subregion Zip

OWNER/APPLICANT AGREES TO COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: _____ Date: 03/04/14
 Address: 7850 Ivanhoe Ave, La Jolla, CA 92037 Phone: 858 863-0900
 (On completion of above, present to the district that provides fire protection to complete Section 2 and 3 below.)

SECTION 2: FACILITY AVAILABILITY

TO BE COMPLETED BY DISTRICT

- District Name: _____
 Indicate the location and distance of the primary fire station that will serve the proposed project: _____
- A. Project is in the District and eligible for service.
 Project is not in the District but is within its Sphere of Influence boundary, owner must apply for annexation.
 Project is not in the District and not within its Sphere of Influence boundary.
 Project is not located entirely within the District and a potential boundary issue exists with the _____ District.
- B. Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is 5-7 minutes.
 Fire protection facilities are not expected to be adequate to serve the proposed development within the next five years.
- C. District conditions are attached. Number of sheets attached: _____
 District will submit conditions at a later date.

SECTION 3. FUELBREAK REQUIREMENTS

Note: The fuelbreak requirements prescribed by the fire district for the proposed project do not authorize any clearing prior to project approval by Planning & Development Services.

- Within the proposed project 100 feet of clearing will be required around all structures.
 The proposed project is located in a hazardous wildland fire area, and additional fuelbreak requirements may apply. Environmental mitigation requirements should be coordinated with the fire district to ensure that these requirements will not pose fire hazards.

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.

Authorized Signature: _____ David Nissen D.C. 691-701-0701 4/14/15
 Print Name and Title Phone Date

On completion of Section 2 and 3 by the District, applicant is to submit this form with application to:
 Planning & Development Services - Zoning Counter, 5510 Overland Ave, Suite 110, San Diego, CA 92123



E. OTAY WATER DISTRICT FIRE FLOW TEST LETTER.



...Dedicated to Community Service
2554 SWEETWATER SPRINGS BLVD, SPRING VALLEY, CA 91776-2006
TELEPHONE (915) 670-2222

April 14, 2014

District Ref. No. FLW-14-016
Project No. n/a

Mr. Kain
GOTHAM MANAGEMENT, LLC
7850 IVANHOE AVE
LA JOLLA, CA 92037

SUBJECT: Fire Flow Calculations for Simpson Farms 13924 CAMPO RD, JAMUL, CA 91935
APN: 596-180-01-00 & 596-180-02-00 (PZ: 1296 / H-322-014 & H-308-015)

Dear Mr. Kain,

Fire flow calculations for the subject site were performed by District Consultant using InfoWATER Version 10.0, under the following assumptions:

The water levels in storage facilities at the time of a fire are approximate to the operating levels that typically occur during a maximum day.

The prescribed *two-hour* fire duration coincides with a maximum day demand condition.

The immediate area around the fire flow node maintains a minimum pressure of 20 PSI.

The results are as follows:

STATIC PRESSURE: 141 PSI *(Based on tanks half-full)(H-322-014)*
RESIDUAL PRESSURE: 133 PSI *(System and fire flow demand of 2,000 gallons per minute)*

STATIC PRESSURE: 126 PSI *(Based on tanks half-full)(H-308-015)*
RESIDUAL PRESSURE: 121 PSI *(System and fire flow demand of 2,000 gallons per minute)*

Sincerely,

OTAY WATER DISTRICT
ENGINEERING PUBLIC SERVICES

Test Report Print Title

ID	Static Demand (gpm)	Static Pressure (psi)	Fire-Flow Demand (gpm)	Residual Pressure (psi)	Available Flow at Hydrant (gpm)	Available Flow Pressure (psi)	Critical Pipe ID	Critical Pipe Velocity (ft/s)
1	0.00	140.51	2,000.00	133.16	2,759.66	129.37	WM-430	10.02

ID	Static Demand (gpm)	Static Pressure (psi)	Fire-Flow Demand (gpm)	Residual Pressure (psi)	Available Flow at Hydrant (gpm)	Available Flow Pressure (psi)	Critical Pipe ID	Critical Pipe Velocity (ft/s)
1	0.00	126.41	2,000.00	120.63	5,499.59	97.70	WM-521	10.03

Education

B.S., Wildlife Biology, minor in Botany, Humboldt State University, 2001

Experience

- Audie Murphy Ranch Recycled Water Supply Pipeline, City of Menifee, Riverside County – burrowing owl monitoring (2013)
- Corrections Corporation of America Otay Mesa Facility Project, Otay Mesa, San Diego County – burrowing habitat assessment and focused burrowing owl survey (2011)
- Hawano Project, Otay Mesa, San Diego County – focused burrowing owl survey (2010)
- Ketchum Ranch Project, Jacumba, County of San Diego – burrowing owl survey (2006)
- Lonestar Ridge Project, Otay Mesa, County of San Diego – burrowing habitat assessment and focused burrowing owl survey (2006, 2009)
- Ocotillo Wind Energy Facility Project, Ocotillo, Imperial County – burrowing owl habitat assessment and focused burrowing owl surveys (2010, 2011), pre-construction burrowing owl surveys (2010, 2011, 2012), and burrowing owl monitoring (2012, 2013)
- Old Otay Mesa Road Improvements Project, Otay Mesa, City of San Diego – burrowing owl habitat assessment and focused burrowing owl surveys (2010)
- PGA West Project, City of La Quinta, Riverside County – pre-construction burrowing owl survey (2013)
- Rancho Guejito Project, County of San Diego – burrowing habitat assessment and focused burrowing owl survey (2008, 2009)
- Rancho Las Pampas Project, Community of Ramona, San Diego County – burrowing owl surveys (2010)
- Ridgecrest Solar Power Project, Kern County – burrowing habitat assessment (2009)
- Romoland Channel, City of Perris, Riverside County – burrowing owl survey (2007)
- San Diego-Tijuana Cross Border Facility Project, Otay Mesa, County of San Diego – burrowing habitat assessment and focused burrowing owl survey (2010)
- San Ysidro Freight Rail Yard Improvement MND and CE, City of San Diego – burrowing habitat assessment and focused burrowing owl survey (2009)
- San Ysidro School District Project, San Ysidro, City of San Diego – burrowing owl survey (2009)
- Simpson Farms Project, Jamul, County of San Diego – burrowing habitat assessment and focused burrowing owl survey (2014)
- State Route 11 and Otay Mesa East Port of Entry, Otay Mesa, County of San Diego – burrowing habitat assessment and focused burrowing owl survey (2006, 2009)
- Sunrise Powerlink, City of El Centro, Imperial County – burrowing owl survey (2007)
- TM 32185-1 Project, French Valley, Riverside County – pre-construction burrowing owl survey (2013)

Laura Moreton

Biologist

Education

M.S., Biodiversity Survey, University of Sussex, England, 2007

B.S., Biology, San Diego State University, 2006

A.S., Biology, Southwestern College, 2004

Experience

- 12 Oaks Winery Resort, County of Riverside – burrowing owl survey (2014)
- Audie Murphy Ranch Recycled Water Supply Pipeline, City of Menifee, Riverside County – burrowing owl monitoring (2013)
- Jackson Avenue Improvement Project, City of Murrietta – burrowing owl survey (2013)
- Ocotillo Wind Energy Facility Project, Ocotillo, Imperial County –pre-construction burrowing owl surveys (2012)
- Otay Hills Aggregate Extraction Project, Otay Mesa, County of San Diego – burrowing owl survey (2012)
- Simpson Farms Project, Jamul, County of San Diego – burrowing owl survey (2014)

Jenna Hartsook

Biologist

Education

B.S., Biology: Ecology, Behavior, and Evolution, University of California San Diego, 2012

A.S., Biological Studies, Cuyamaca College, 2010

Experience

- 12 Oaks Winery Resort, County of Riverside – burrowing owl survey (2014)
- Harmony Grove Parcels Project, Harmony Grove, County of San Diego – focused burrowing owl survey (2014)
- Simpson Farms Project, Jamul, County of San Diego – focused burrowing owl survey (2014)
- Tapestry Specific Area Plan – Hesperia, San Bernardino County – focused burrowing owl survey (2014)

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
Suite 200
La Mesa, CA 91942
619.462.1515 tel
619.462.0552 fax
www.helixepi.com



June 5, 2014

GML-01

Ms. Stacey Love
U.S. Fish & Wildlife Service
2177 Salk Ave., Suite 250
Carlsbad, CA 92008

Subject: Year 2014 Coastal California Gnatcatcher Survey Report for the Simpson Farms Project

Dear Ms. Love:

This letter presents the results of a U.S. Fish and Wildlife Service (USFWS) protocol presence/absence survey conducted for the coastal California gnatcatcher (*Poliophtila californica californica*; CAGN) by HELIX Environmental Planning, Inc. (HELIX) for the proposed Simpson Farms Project (Project). This report describes the methods used to perform the survey and the results. It is being submitted to the USFWS as a condition of HELIX's Threatened and Endangered Species Permit TE778195.

PROJECT LOCATION

The 158.7-acre Project site (Assessor's Parcel Numbers 596-180-01 and -02) is located in the unincorporated community of Jamul in San Diego County, California (Figures 1 and 2). Specifically, the Project site is located between State Route (SR-) 94 (Campo Road), Jefferson Road, Olive Vista Drive, and private properties on Hillside Drive and Via del Jamul Drive, within Section 3, Township 17 South, Range 1 East on the U.S. Geological Survey (USGS) 7.5-minute Dulzura quadrangle map (Figure 3). The street address of the Project site is 13924 Highway 94.

The Project site is located on unincorporated lands within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. The MSCP designation for the site is Unincorporated Land outside the Pre-Approved Mitigation Area (PAMA), outside the Hardline Preserve, and outside the Take-Authorized Area (Figure 4).

PROJECT DESCRIPTION

The Project consists of a mixed-use development within a total direct disturbance area of approximately 152.59 acres, with 94 single-family dwelling units (DUs), a neighborhood commercial site, and related uses such as access roads, drainage facilities and open space (Figure 5). Individual lot categories include 92 dedicated residential lots (with 92 associated DUs), 2 lots with combined residential and detention basin use (Lot Nos. 31 and 41, with 2 associated DUs), 1 commercial lot (Lot No. 99), 3 detention basin lots (Lot Nos. 7, 21 and 97), 2 open space lots (Lot Nos. 98 and 100; only lot 98 being biological in nature), and 7 roadway lots (Lot Nos. 101 to 107).

Project development would be conducted in 2 phases, identified as Units 1 and 2. Specifically, Unit 1 would include all proposed development except the commercial site (Lot No. 99), with commercial development requiring additional subsequent discretionary approval from the County and thus identified as Unit 2.

METHODS

The survey consisted of 3 site visits that were performed by HELIX biologist Jason Kurnow (TE 778195) in accordance with the current USFWS protocol (USFWS 1997). Surveys were conducted within potential CAGN habitat occurring within the Project site (Diegan coastal sage scrub and baccharis scrub; Figure 6). The total area surveyed was approximately 98.0 acres. The survey was conducted on foot with the aid of binoculars. Taped CAGN vocalizations were played for approximately 10 seconds at approximate 5-minute intervals. If a CAGN was heard before playing the tape, the tape was not played. The tape also was not played after a CAGN was detected. Table 1 details the survey locations, times, and conditions.

Table 1 SURVEY INFORMATION				
DATE	BIOLOGIST	TIME (start/stop)	ACRES (ac) SURVEYED/S URVEY RATE (ac per hour)	WEATHER CONDITIONS (start/stop)
4/7/14	Jason Kurnow	0700/1155	98.0 ac/20.0 ac	63°F, 0% cloud cover, wind 0-2 mph/ 71°F, 0% cloud cover, wind 3-6 mph.
4/14/14	Jason Kurnow Tara Baxter*	0715/1145	98.0 ac/21.8 ac	55°F, 0% cloud cover, wind 0-2 mph/ 85°F, 0% cloud cover, wind 1-4 mph.
4/25/14	Jason Kurnow	0700/1145	98.0 ac/20.6 ac	58°F, 30% cloud cover, wind 1-3 mph/ 71°F, 40% cloud cover, wind 4-7 mph.

*Supervised individual

VEGETATION COMMUNITIES

Eight vegetation communities occur on site: Baccharis scrub, coast live oak woodland, Diegan coastal sage scrub, Engelmann oak woodland, eucalyptus woodland, non-native grassland, non-native vegetation, and southern coast live oak riparian forest. Disturbed habitat and developed land also occur on the site (Figure 6). A brief description of each community is provided below.

Southern Coast Live Oak Riparian Forest

Southern coast live oak riparian forest is an open, to locally dense, evergreen, riparian woodland that is dominated by coast live oak (*Quercus agrifolia*). This community is richer in herbs and poorer in understory shrubs than other riparian communities. Southern coast live oak riparian forest occurs along a drainage in the northwest of the Project site, and includes arroyo willow (*Salix lasiolepis*), olive (*Olea europaea*), bridal creeper (*Asparagus asparagoides*).

Engelmann Oak Woodland

Engelmann oak woodland occurs in relatively moist sites on fine-textured soils of gentle slopes and valley bottoms. This community is dominated by Engelmann oaks (*Quercus engelmannii*) in association with coast live oak. Annual grasses dominate the understory. Open Engelmann oak woodland intergrades with coastal sage scrub on drier rockier sites and with a denser mix of Engelmann oak and coast live oak on more mesic sites. Engelmann oak woodland on the Project site is open and intergrades with coastal sage scrub. Dominant species include Engelmann oak, San Diego honeysuckle (*Lonicera subspicata* var. *denudata*), poison oak (*Toxicodendron diversilobum*), and California sagebrush (*Artemisia californica*).

Coast Live Oak Woodland

Coast live oak woodland is an open to dense evergreen woodland or forest community, dominated by coast live oak that may reach a height of 35-80 feet. The shrub layer consists of toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), spreading snowberry (*Symphoricarpos mollis*), fuchsia-flowered gooseberry (*Ribes speciosum*), and poison oak. A dense herbaceous understory is dominated by miner's lettuce (*Claytonia perfoliata* var. *perfoliata*) and chickweed (*Stellaria media*). This community occurs along the coastal foothills of the Peninsular Ranges; typically, on north-facing slopes and shaded ravines (Holland 1986). Coast live oak woodland on the Project site occurs in the northwest and consists of a dense canopy of coast live oak, with no understory.

Baccharis Scrub

Baccharis scrub is typically found on disturbed sites, nutrient-poor soils, or upper terraces of river valleys. It is dominated by broom baccharis (*Baccharis sarothroides*) and/or coyote brush (*Baccharis pilularis*), and might also include goldenbush (*Isocoma menziesii*), California sagebrush, and California buckwheat (*Eriogonum fasciculatum*) in lesser amounts. Baccharis

scrub on the Project site is dominated by broom baccharis, and includes black elderberry (*Sambucus nigra* ssp. *canadensis*), Peruvian pepper tree (*Schinus molle*), and laurel sumac (*Malosma laurina*) as isolated individuals. This community occurs near the center of the Project area, at the edges of former agricultural areas and native coastal sage scrub.

Diegan Coastal Sage Scrub

Diegan coastal sage scrub is one of the major shrub communities in southern California that occupies xeric sites with shallow soils. Dominated by drought-deciduous shrubs with shallow root systems and open canopies, coastal sage scrub communities often contain a substantial herbaceous component. Diegan coastal sage scrub occurs in coastal southern California from Los Angeles County into northwestern Baja California, Mexico (Baja; Holland 1986). This community occurs in the eastern and half of the site. Dominant plant species within this vegetation community include California sagebrush, California buckwheat, white sage (*Salvia apiana*), mission manzanita (*Xylococcus bicolor*), and toyon (*Heteromeles arbutifolia*).

Non-native Grassland

Non-native grassland is a dense to sparse cover of annual grasses, often associated with native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Most of the annual introduced species that compose non-native grassland originated in the Mediterranean region of Europe, an area with a climate similar to that in California and a long history of agriculture. These two factors have contributed to the successful invasion and establishment of these species and the replacement of native perennial grasslands with annual non-native grassland (Jackson 1985).

Non-native grassland occurs over much of the western half of the Project site, in former agricultural areas. The dominant species in non-native grassland on the Project site are soft chess (*Bromus hordeaceus*), foxtail chess (*Bromus madritensis*), black mustard (*Brassica nigra*), Italian thistle (*Carduus pycnocephalus*), long-stem filaree (*Erodium botrys*).

Eucalyptus Woodland

Eucalyptus woodland is a dense to sparse canopy of non-native gum trees (*Eucalyptus* spp.), with shrubby and herbaceous understory ranging from almost non-existent to moderately dense. Native species can be present in the understory, but only where the gum tree canopy is not closed. Eucalyptus woodland occurs on the Project site south and west of the existing house.

Non-native Vegetation

Non-native vegetation is dominated by escaped ornamentals and naturalized introduced species, often in a monoculture. Non-native vegetation on the site consists of patches of non-native trees such as olive (*Olea europaea*), Peruvian pepper (*Schinus molle*), tree tobacco (*Nicotiana glauca*), and Mexican fan palm (*Washingtonia robusta*), mostly along roads in the southwest corner.

Disturbed Habitat

Disturbed habitat is highly disturbed land that retains a soil substrate. If it is vegetated, it supports an assemblage of almost exclusively non-native, weedy, upland species that colonize after human disturbance. There is no recognizable native or naturalized vegetation association, and characteristic species vary considerably depending on local colonization potential. The area mapped as disturbed habitat on the Project site is used for dirt-bike activity and includes extensive trails and constructed jumps and moguls. This area is mostly un-vegetated, and supports only long-beak filaree (*Erodium botrys*) in spaces not recently disturbed by dirt-bikes.

Developed Land

Developed land exists where permanent structures and/or pavement have been placed (preventing the growth of vegetation) or where landscaping is clearly tended and maintained. Developed land occurring within the Project site consists of the existing house and barn, driveways, and an abandoned house site in the southwest corner, and a landscaped slope on the south side of Olive Vista Drive.

RESULTS

CAGN was not observed or detected during the survey effort and is currently presumed to be absent from the Project site.


Potential CAGN habitat occurring on site is of relatively good quality based on acreage, topographic profile, species composition, and density. Terrain consisted primarily of rolling hills with relatively mild slope aspects. In many instances, the vegetation within the potential CAGN habitat on site is relatively open. Dominant plant species within potential habitat include California sagebrush, California buckwheat, white sage, mission manzanita, and toyon. Broom baccharis is dominant within the baccharis scrub vegetation community.

CERTIFICATION

I certify that the information in this survey report and enclosed exhibit fully and accurately represents my work.

Please contact me at (619) 462-1515 if you have any questions.

Sincerely,



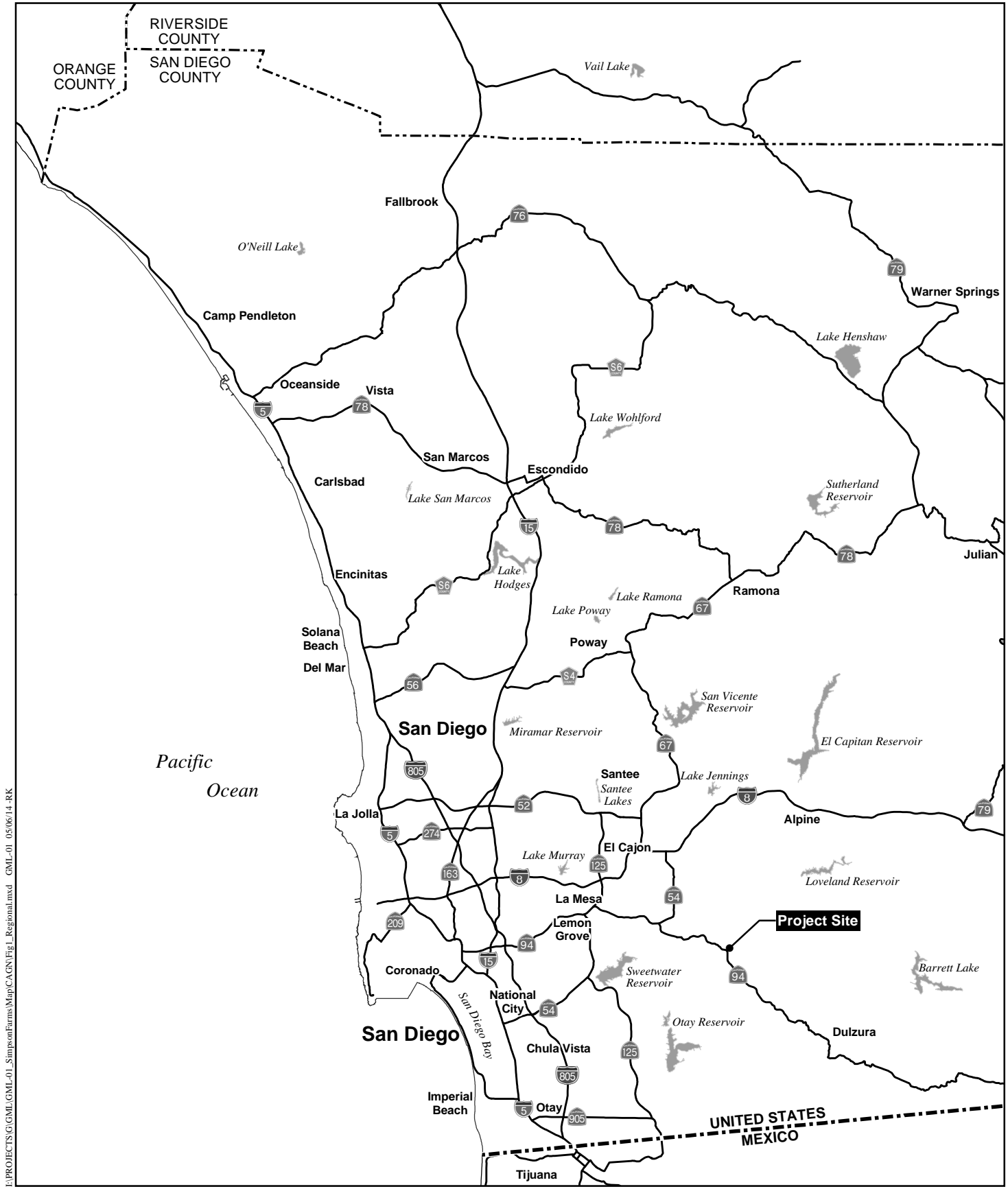
Jason Kurnow
Biologist

Enclosures:

- Figure 1 Regional Location Map
- Figure 2 Project Location Map (Aerial Photograph)
- Figure 3 Project Location Map (USGS Topography)
- Figure 4 County of San Diego MSCP Map
- Figure 5 Site Plan
- Figure 6 Vegetation/Sensitive Resources

REFERENCES

- Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, The Resources Agency. 156 pp.
- Jackson, L. 1985. Ecological origins of California's Mediterranean grasses. *Journal of Biogeography* 12: 349-361.
- U.S. Fish and Wildlife Service (USFWS). 1997. Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. 5pp.



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Regional Location Map

SIMPSON FARMS

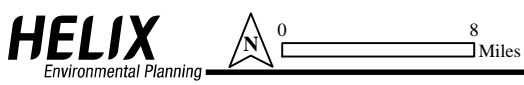
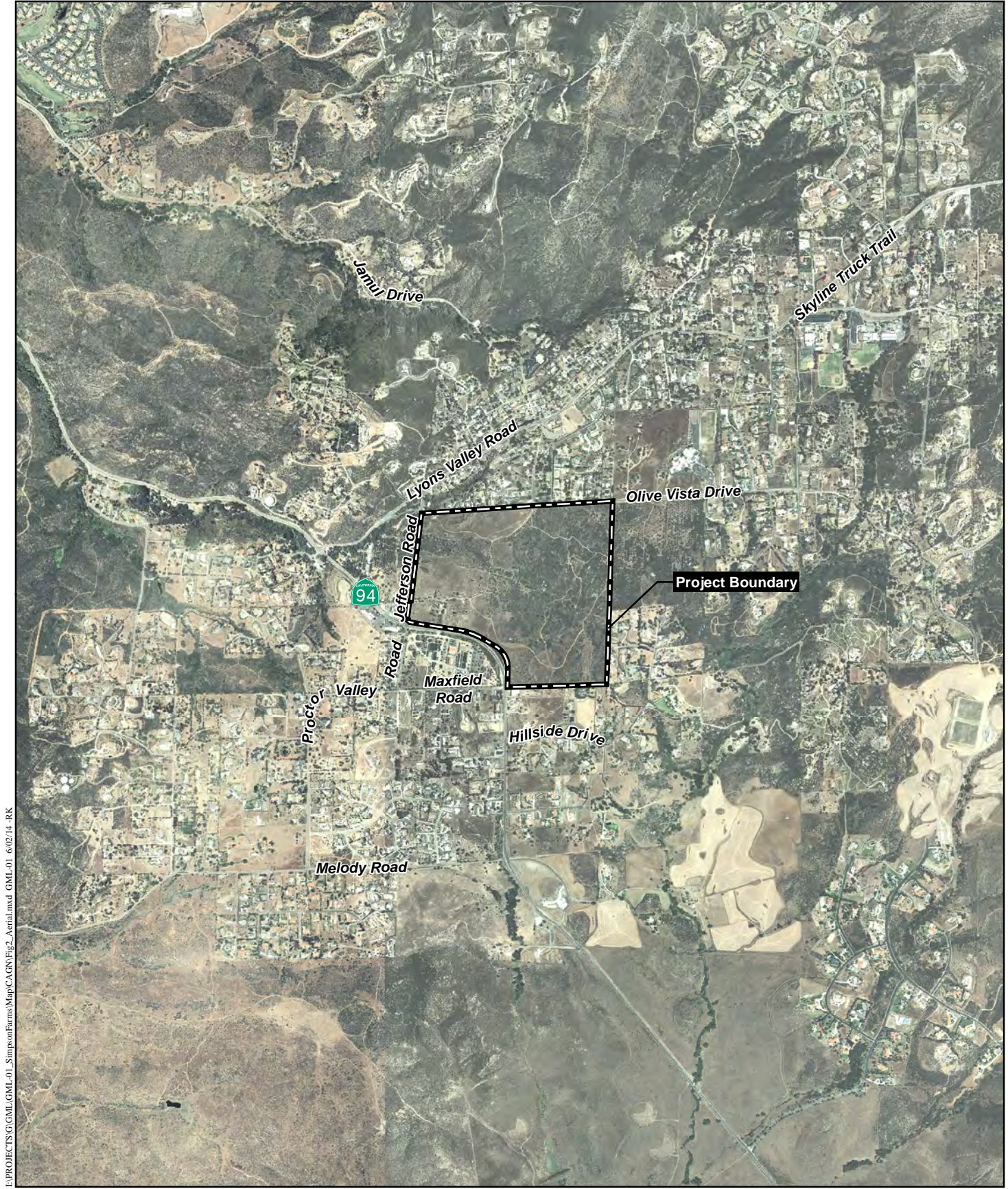


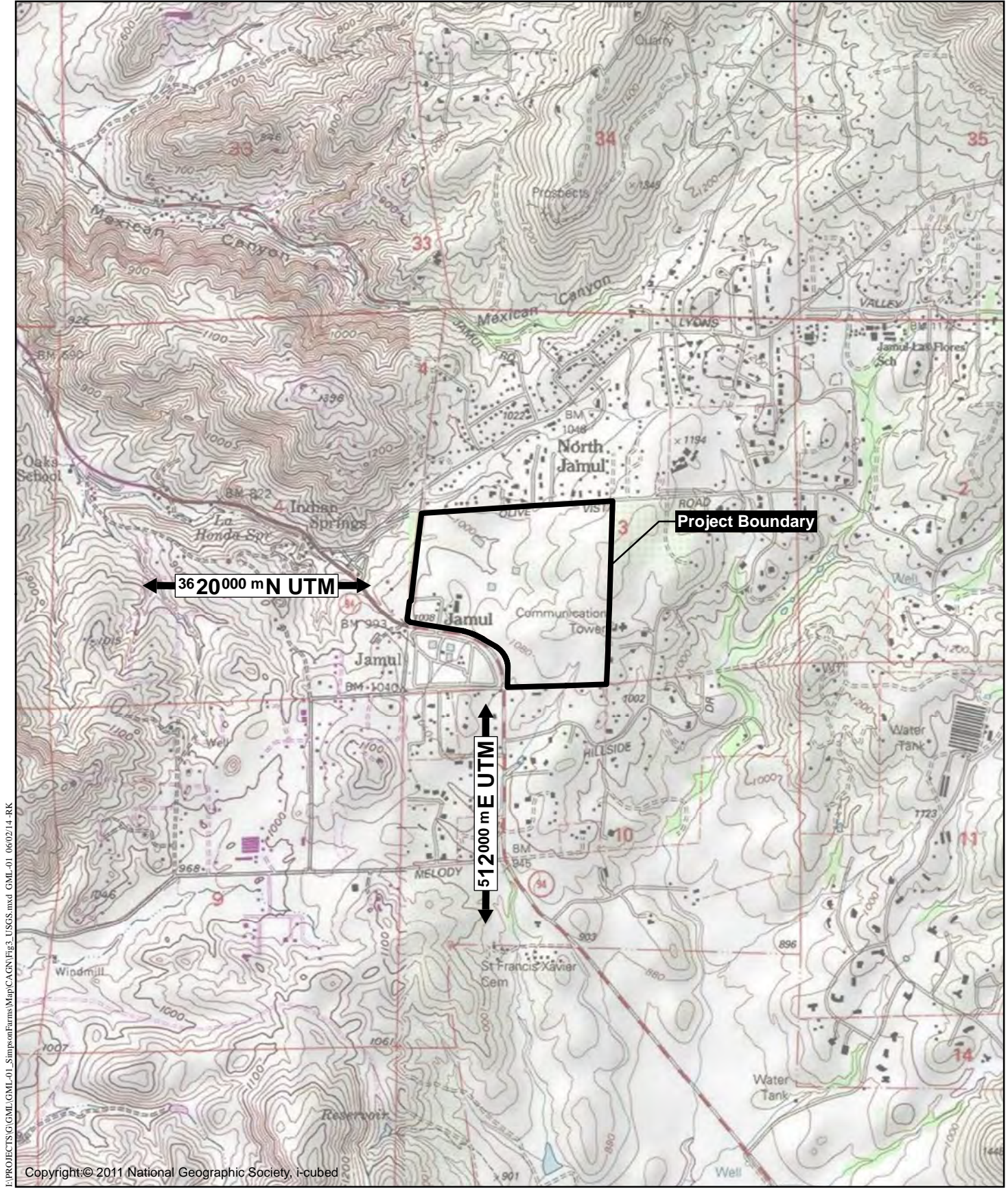
Figure 1



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Project Location Map (Aerial Photograph)

SIMPSON FARMS



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Copyright © 2011 National Geographic Society, i-cubed

Project Location Map (USGS Topography)

SIMPSON FARMS

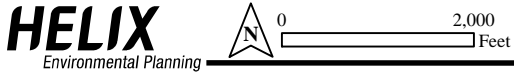
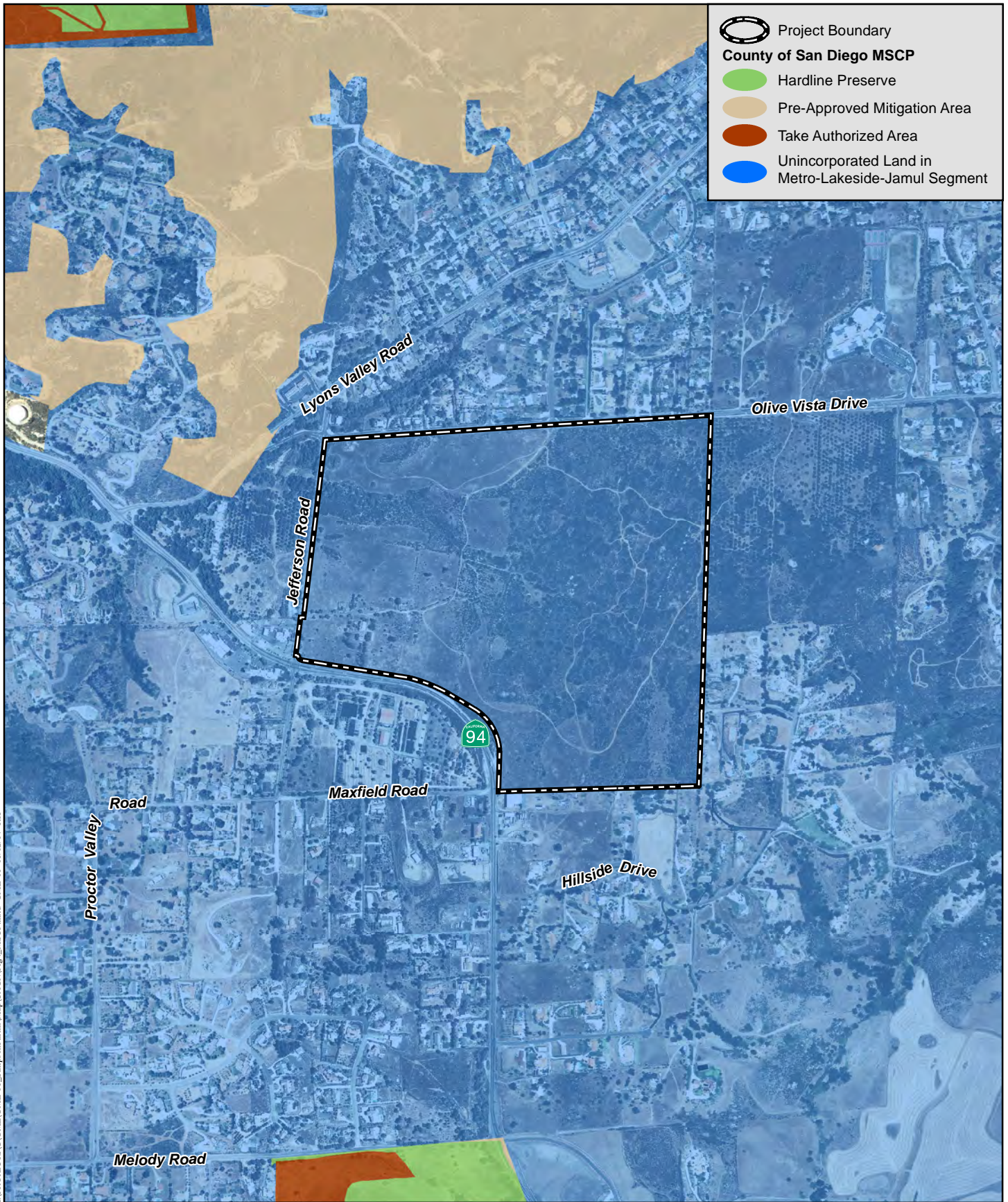


Figure 3



Project Boundary

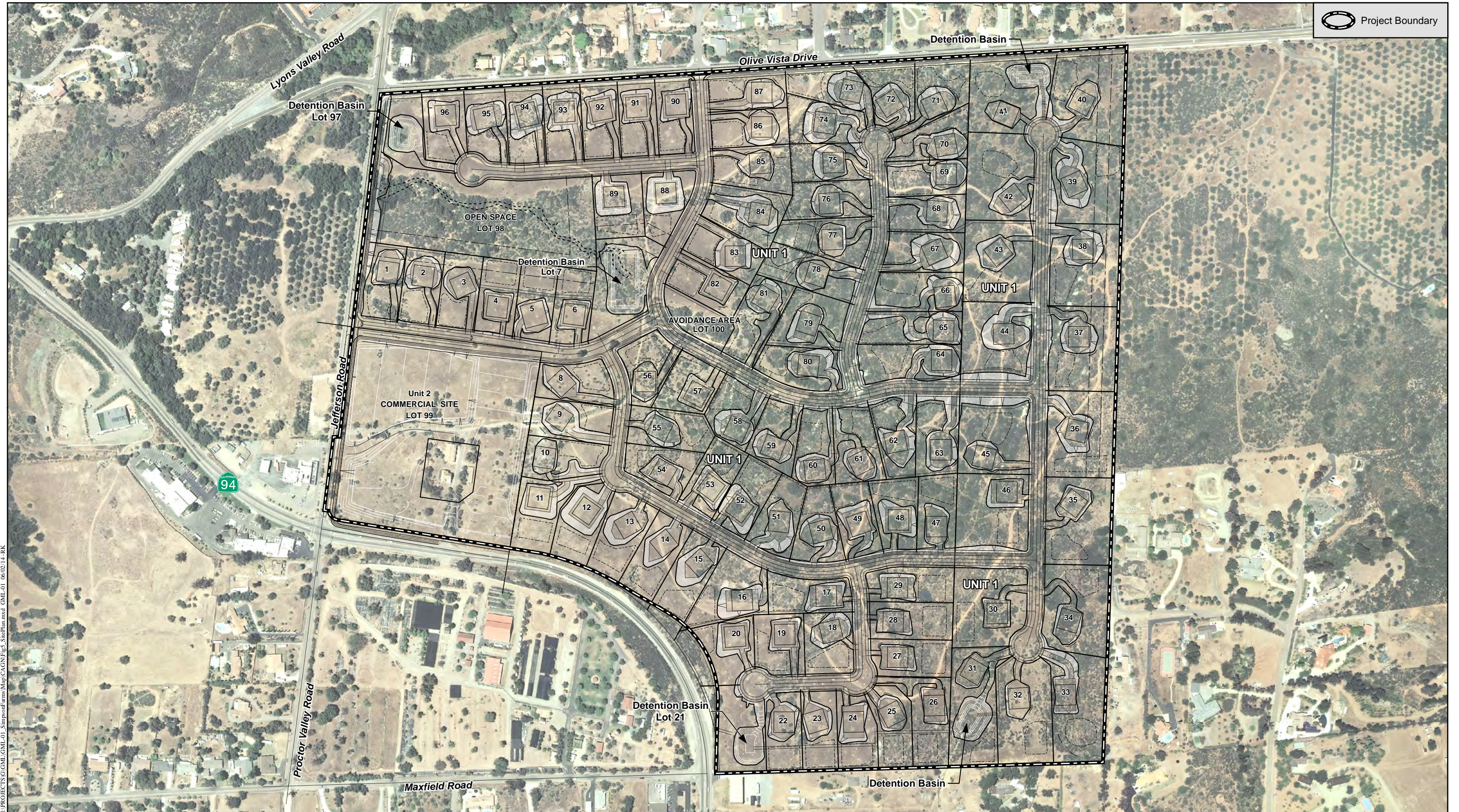
County of San Diego MSCP

- Hardline Preserve
- Pre-Approved Mitigation Area
- Take Authorized Area
- Unincorporated Land in Metro-Lakeside-Jamul Segment

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County of San Diego MSCP Map

SIMPSON FARMS

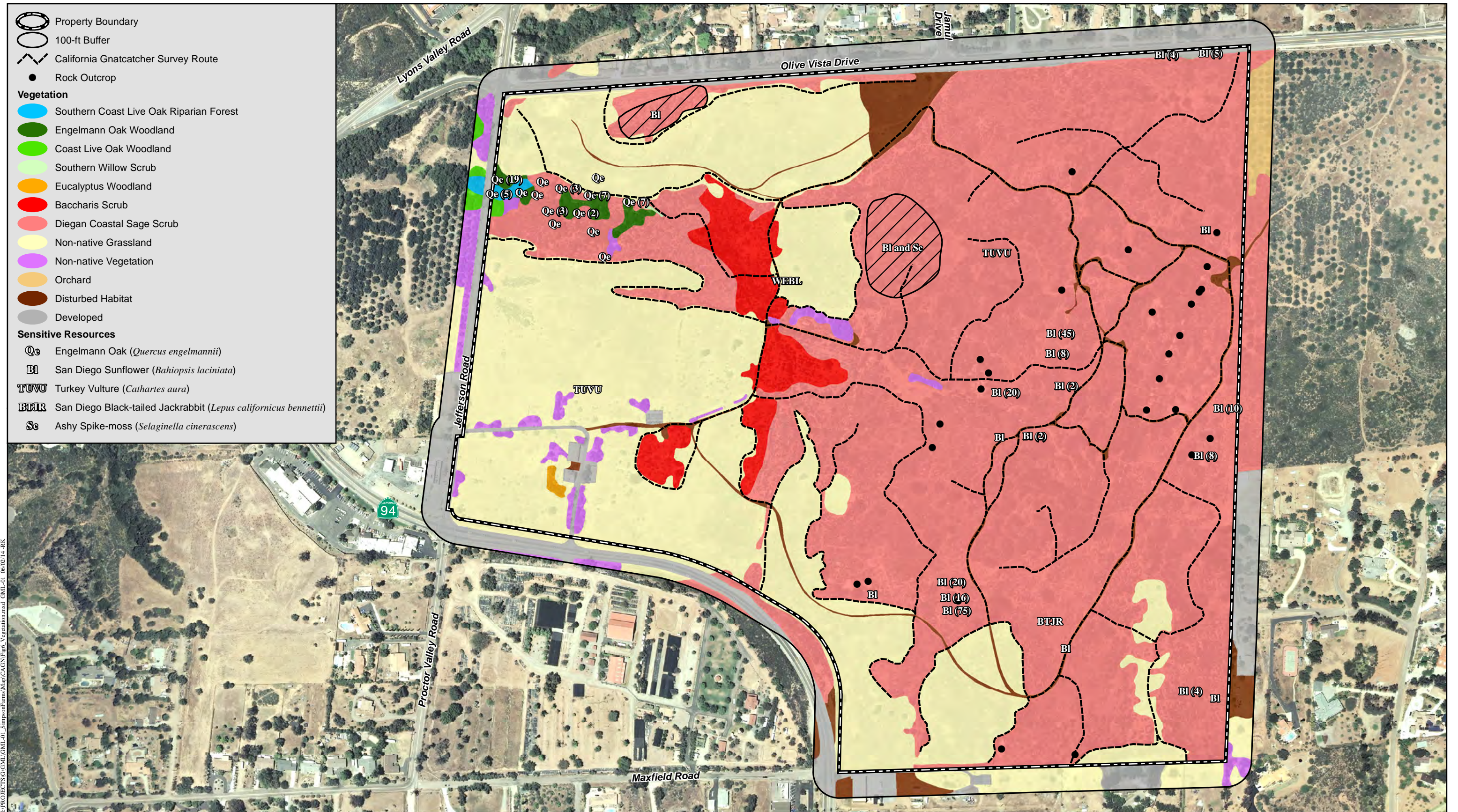


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Site Plan

SIMPSON FARMS

Figure 5



Vegetation/Sensitive Resources

SIMPSON FARMS

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Simpson Farms City/County: Jamul/San Diego Sampling Date: 04/14/2014
 Applicant/Owner: _____ State: CA Sampling Point: 1
 Investigator(s): S. Nigro, J. Kurnow Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): drainage bottom Local relief (concave, convex, none): concave Slope (%): _____
 Subregion (LRR): C Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Ramona sandy loam NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No _____ (If no, explain in Remarks.)
 Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes No _____
 Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/> Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>
Remarks: Does not meet USACE wetland criteria; is CDFW riparian habitat and 6-foot wide USACE non-wetland waters.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Salix lasiolepis</u>	<u>40</u>	<u>X</u>	<u>FACW</u>	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>50</u> (A/B)
2. <u>Salix gooddingii</u>	<u>20</u>	<u>X</u>	<u>FACW</u>	
3. _____				
4. _____				
	<u>60</u>	= Total Cover		Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species _____ x 5 = _____ Column Totals: _____ (A) _____ (B) Prevalence Index = B/A = _____
Sapling/Shrub Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Olea europea</u>	<u>20</u>	<u>X</u>	<u>UPL</u>	
2. _____				
3. _____				
4. _____				
5. _____				
	<u>20</u>	= Total Cover		
Herb Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Toxicodendron diversilobum</u>	<u>5</u>	<u>X</u>	<u>UPL</u>	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)
2. <u>Euphorbia pepus</u>	<u>1</u>		<u>UPL</u>	
3. <u>Asparagus asparagoides</u>	<u>1</u>		<u>UPL</u>	
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
	<u>7</u>	= Total Cover		
Woody Vine Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>N/A</u>				¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. _____				
	<u>0</u>	= Total Cover		
% Bare Ground in Herb Stratum <u>0</u> % Cover of Biotic Crust <u>0</u>				

Remarks:
 Oak trees rooted on adjacent terraces, at higher elevation than sampling point, thus they were not included in the vegetation stratum data.

SOIL

Sampling Point: 1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-16	7.5YR 3/4	100	-	-	-	-	sndy loam	
16-20	7.5YR 2.5/2	95	7.5YR 4/6	5	C	M	loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 1 cm Muck (A9) (LRR C)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> 2 cm Muck (A10) (LRR B)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1)	<input type="checkbox"/> Reduced Vertic (F18)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Stratified Layers (A5) (LRR C)	<input type="checkbox"/> Depleted Matrix (F3)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> 1 cm Muck (A9) (LRR D)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Vernal Pools (F9)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)		

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/>
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Remarks:
 Hydric soil indicators not present.
 Photos 25-27

HYDROLOGY

Wetland Hydrology Indicators:	
Primary Indicators (minimum of one required; check all that apply)	Secondary Indicators (2 or more required)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Salt Crust (B11)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Biotic Crust (B12)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)
<input type="checkbox"/> Water Marks (B1) (Nonriverine)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)
<input type="checkbox"/> Sediment Deposits (B2) (Nonriverine)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)
<input type="checkbox"/> Drift Deposits (B3) (Nonriverine)	<input type="checkbox"/> Presence of Reduced Iron (C4)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Thin Muck Surface (C7)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Other (Explain in Remarks)
	<input type="checkbox"/> Water Marks (B1) (Riverine)
	<input checked="" type="checkbox"/> Sediment Deposits (B2) (Riverine)
	<input type="checkbox"/> Drift Deposits (B3) (Riverine)
	<input type="checkbox"/> Drainage Patterns (B10)
	<input type="checkbox"/> Dry-Season Water Table (C2)
	<input type="checkbox"/> Crayfish Burrows (C8)
	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
	<input type="checkbox"/> Shallow Aquitard (D3)
	<input type="checkbox"/> FAC-Neutral Test (D5)

Field Observations: Surface Water Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? (includes capillary fringe) Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____	Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:
 Remarks:
 W:U = 2:2
 No primary and only one secondary hydrology indicator present, thus hydrology criterion not met.

WETLAND DETERMINATION DATA FORM – Arid West Region

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 Investigator(s): K. Osmundson Section, Township, Range: _____
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 Subregion (LRR): C Lat: _____ Long: _____ Datum: _____
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Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/> Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No _____	Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>
Remarks: Sampling point is located within non-wetland waters of the U.S./State and riparian-vegetated streambed.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Salix lasiolepis</u>	20	X	FACW	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>25</u> (A/B)
2. <u>Quercus agrifolia</u>	40	X	UPL	
3. _____				
4. _____				
<u>60</u> = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species <u>20</u> x 2 = <u>40</u> FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species <u>55</u> x 5 = <u>275</u> Column Totals: <u>75</u> (A) <u>315</u> (B) Prevalence Index = B/A = <u>4.2</u>
Sapling/Shrub Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Olea europea</u>	10	X	UPL	
2. _____				
3. _____				
4. _____				
5. _____				
<u>10</u> = Total Cover				
Herb Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Toxicodendron diversilobum</u>	5	X	UPL	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. _____				
3. _____				
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
<u>5</u> = Total Cover				
Woody Vine Stratum (Plot size: <u>r=15'</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>N/A</u>				Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/>
2. _____				
<u>0</u> = Total Cover				
% Bare Ground in Herb Stratum <u>25</u> % Cover of Biotic Crust <u>0</u>				

Remarks:

