EVERETT AND ASSOCIATES
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22 September 2022

Ashley Smith
Chief, Project Planning
Planning and Development Services
County of San Diego
5510 Overland Avenue, Ste 110
San Diego, CA 92123

Re: Biological Assessment Memorandum - Greens Mini Storage (PDS2005-3300-05-052) Habitat Loss Permit Application

Dear Ashley,

After our Batching Meeting with the Wildlife Agencies on Friday, August 26, we are proceeding to assemble the necessary documentation to initiate the Habitat Loss Permit (HLP) process for proposed impacts to Coastal Sage Scrub (CSS) on the above-referenced Greens Mini Storage Escondido project site. As part of the necessary submittals, you have requested an updated Biological Assessment focusing on the specific 1.1 acre impact area in question. This memorandum reviews past biological analysis for the site and updates the biological information necessary to support the HLP process.

As noted in my letter to you of 18 August 2022 (correcting the acreage of the area to be disturbed - see attached), this Greens Mini Storage project is a request to move excess soil from an adjacent location on the same parcel onto an area currently containing CSS at the extreme north end of the parcel (APN 187-170-62). The project site is situated between North Center City Parkway and Interstate 15, approximately three miles north of State Route 78 and the City of Escondido (For additional location and background information see Scheidt Summary Biology Report October 2019).

The overall mini-storage project encompasses two legal parcels totaling 31.7 acres, and was an application for a Major Use Permit (MUP), a Grading Permit, and a Boundary Adjustment to create a new 6.0 acre parcel (Parcel A) from the original property acreage (formerly APNs 187-170-48 & 187-170-49). The new APNs are 187-170-63 for the new 25.79 acre southern parcel and 187-170-62 (as noted above) for the new 6.0 acre Parcel A.

Permits for the project have been issued, and the mini-storage buildings and infrastructure on the southern parcel are currently nearing completion. As part of the extensive grading required to complete the project, a large amount of soil was moved from the southern parcel onto Parcel A. A small area at the north end of Parcel A containing CSS was not included in the grading plans for Parcel A, and was originally not intended to receive excess fill, but was also not placed into biological open space. This 1.1 acre area is the area now proposed to receive excess fill currently being stored on other areas of Parcel A (Figure 1).

History of Biological Studies and Analysis

As detailed in a memorandum from Biologist Vincent Scheidt dated December 3, 2020, the first biological studies for the property containing the 1.1 acre CSS area currently in question were conducted in 2001 (by TeraCor). These studies included focused protocol surveys for California Gnatcatchers *Polioptila californica*, the results of which were negative (See Attachments for copies of all pertinent documents referenced in this memorandum).

A second set of biological studies was completed in 2009 (by Helix Environmental), which also included gnatcatcher surveys, also with negative results. A third round of gnatcatcher surveys in 2012 were also negative, but these last surveys (at the County's directive) did not specifically include the 1.1 acre area.

In mid 2012 Scheidt began his involvement in the mini-storage project. He produced an initial Summary Biology Report in May 2013. Over the next six years, based on changes and additions to the project description, he prepared four revisions to the report including a final updated report dated October 2019. All these versions addressed the area currently proposed for coverage under the requested HLP.

In addition, Mr. Scheidt subsequently prepared three memoranda (August 2019, March 2020, December 2020). These memoranda address, in addition to other issues, the functions and values (quality) of the CSS that would be impacted by the proposed soil movement. The memos point out factors that render the quality and sustainability of the CSS that will be impacted as very low, including its small size, isolated and fragmented nature (no connectivity), and that it is bounded on the west by Interstate 15, on the east by Center City Parkway, and is otherwise surrounded by development.

Description of Area to be Impacted

Scheidt (2019) described the CSS on the site as follows:

"Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage - Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC [Holland Code 37120 - does not occur in the area to be impacted] proper. Soft-woody shrubs are present in the Coastal Sage - Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate."

Scheidt subsequently reevaluated the habitat in the 1.1 acre area (March 10, 2020) and concluded:

"This patch of vegetation is of low biological resource value for the following reasons:

1. It is effectively surrounded by development
2. It is clearly successional from the original mixed chaparral
3. It is fragmented
4. It is of small patch size"

He further stated "In my professional opinion, the loss of this small patch would not be considered a regionally-significant non-mitigable impact. The vegetation is of low value and does not show any evidence of supporting significant populations of sensitive species."

Scheidt then again elaborated (December 3, 2020):

"Coastal Sage Scrub (CSS) vegetation that has become of significantly lowered biological resource value for the following reasons:

1. The CSS is now effectively surrounded by development:
   a. The placement of soil and rock on the southern portion of Parcel "A" eliminated the last open connection to the south. This is a change in circumstances from the October 2019 biological resources update report.
   b. To the east is a new waterline in the North Centre City Parkway right-of-way, with developed lands beyond that. The waterline and associated improvements were not present in October 2019, which is another change in circumstances.
   c. To the west is I-15.
   d. To the north is a telecommunications structure, a driveway, etc. followed by Mesa Rock Road. These all represent development.
2. The CSS is clearly successional from the original SMC, which was the climax community formerly covering this area prior to the construction of I-15.
3. The CSS is fragmented (no connectivity to any substantial areas of similar habitat).
4. The CSS is of small patch size (1.6 acres)." [Note: The area was subsequently surveyed and the correct area is 1.1 acres. See attached Data Correction letter]

Site Conditions in 2022

I visited the site on August 10th and September 12th 2022 to reexamine the vegetation on the site. Observation conditions for both visits were excellent and the entire site and surrounding areas were examined (See current site photographs below). Conditions in 2022 are essentially identical to those reported by Scheidt, with flat-top buckwheat, isocoma, broom baccharis *Baccharis sarothroides*, and black sage dominating, interspersed with laurel sumac *Malosma laurina*. No sensitive species (plant or animal) were observed during my visits, and none are deemed likely to occur. No plant or animal species not previously reported were detected on the site.

The currently undisturbed area to be impacted is not contiguous with existing biological open space on the same parcel (Figure 2).

Impacts, Conclusions, Mitigation, and Recommendations

Approval of the HLP will result in impacts to a 1.1 acre low-quality, fragmented patch of CSS. No sensitive species are likely to be impacted. I concur with Mr. Scheidt's conclusion that the habitat in question is of extremely low quality and is unlikely to persist into the future given the factors mentioned above. Allowing impacts to this small patch of CSS is appropriate under these circumstances.

Mitigation for impacts to 1.1 acres of CSS will be accomplished by the purchase of an equal amount of habitat (1:1 ratio) in an approved mitigation bank in the region, such as Daley Ranch.

Prior to any disturbance to the site, a focused protocol survey will be conducted to determine the presence/absence of the federally threatened California Gnatcatcher. If the gnatcatcher is detected, consultation with the U.S. Fish and Wildlife Service will be initiated.

If you have any questions or need additional clarification, please contact me at your convenience.

Sincerely,

William T. Everett
San Diego and Riverside County Approved Biological Consultant

Cc: Dr. Rajesh Kadakia, Jim Simmons, Kendalyn White

Attachments (Provided separately to PDS as digital documents):

Letter from Everett and Associates to Ashley Smith, 18 August 2022
Letter from Project Surveyor, Mike Wunderlin March 2021
Scheidt Summary Biology Report May 2013
Scheidt Summary Biology Report June 2019
Scheidt Summary Biology Report July 2019
Scheidt Summary Biology Report September 2019
Scheidt Summary Biology Report, October 2019
Scheidt Memo August 2019
Scheidt Memo March 2020
Schedit Memo December 2020

Figure 1. Area of CSS to be impacted ~1.1 Acres (HLP area).

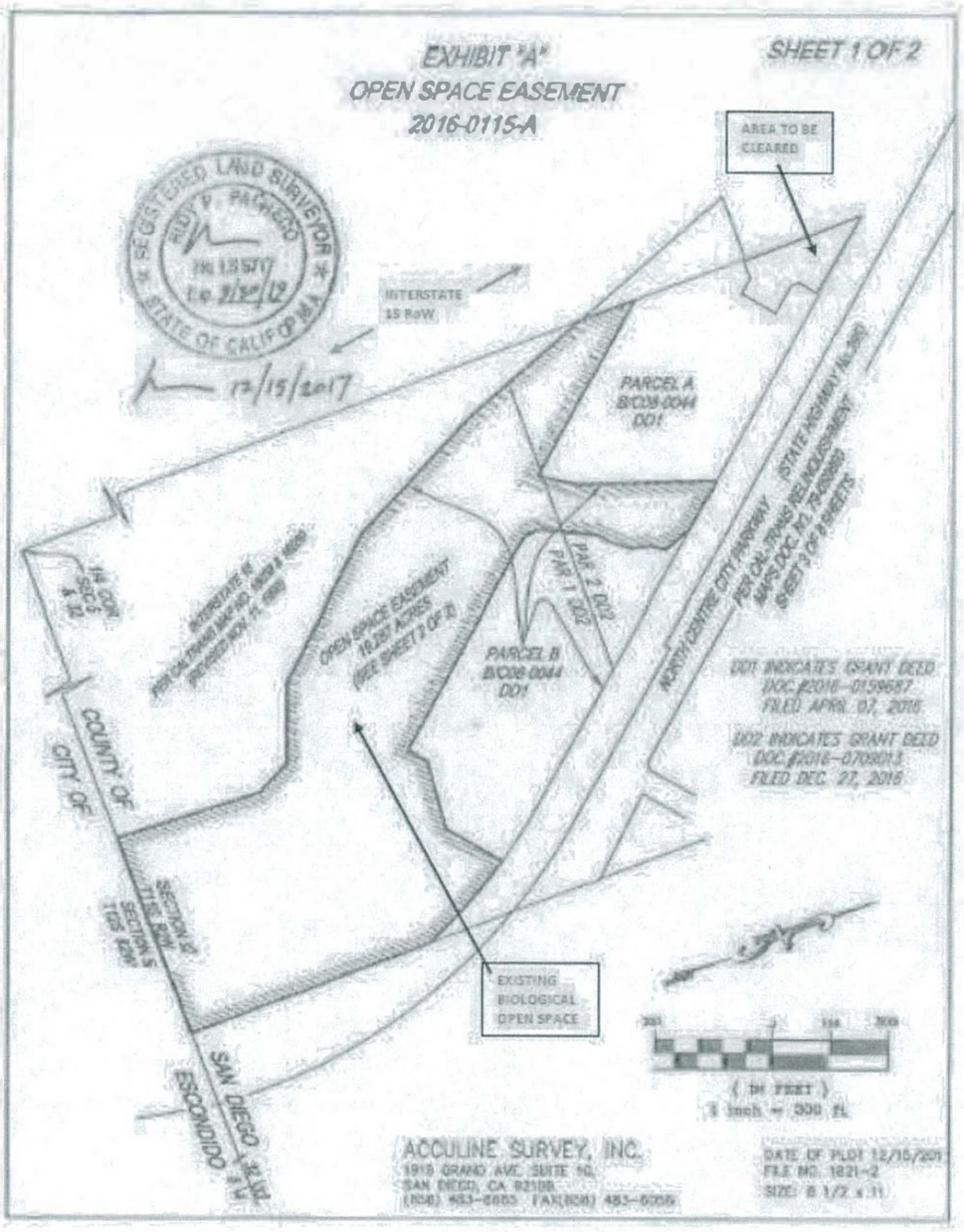
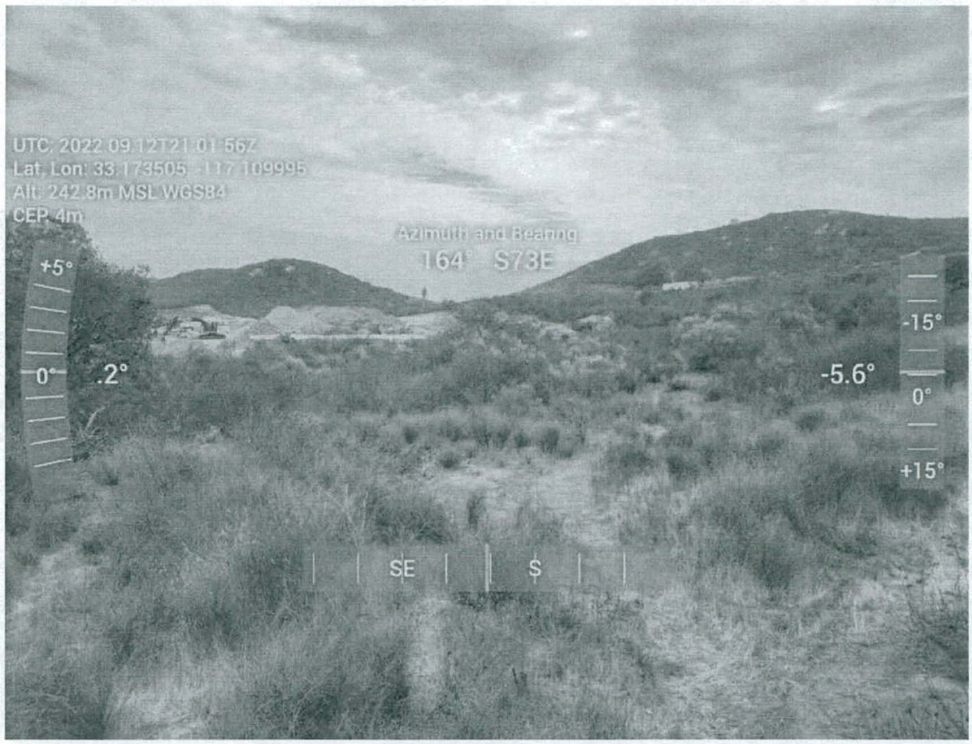


Figure 2. Location of area to be impacted relative to existing biological open space.

Photograph 1. Unmanned Aerial Vehicle photograph of HLP area (13 September 2022). Top of image is due north.

Photograph 2. View from center of HLP area looking north.



Photograph 3. View from center of HLP area looking south.

Photograph 4. View from center of HLP area looking northeast.

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18 August 2022

Ashley Smith
Chief, Project Planning
Planning and Development Services
County of San Diego
5510 Overland Avenue, Ste 110
San Diego, CA 92123

Re: Correction of Information and Additional Information - Greens Storage (PDS2005-3300-05-052), for Wildlife Agency Batching Meeting August 26, 2022

Dear Ashley,

As you are aware, we have a Batching Meeting with the Wildlife Agencies on Friday, August 26, to discuss the Greens Storage project request to move excess soil from an adjacent location on the same parcel onto an area currently containing coastal sage scrub (CSS) at the extreme north end of APN 187-170-62.

In the Batching Meeting agenda summary for the request, a reference is made to the approximately 1.4 acre area of CSS that would be impacted if the soil move is approved. The figure of approximately 1.4 acres (and up to 1.6 acres) has been repeated throughout a series of biological memoranda (attached) prepared by Vincent Scheidt as recently as December 3, 2020.

In a recent conversation with project surveyor Michael Wunderlin (California Licensed Land Surveyor # 5210), it came to my attention that in early 2021 the area in question was flagged by Mr. Scheidt, surveyed by Mr. Wunderlin, and it was determined that the area of sensitive vegetation is in fact 1.1 acres (See attached letter from Mr. Wunderlin), not the area calculations previously mentioned. Apparently, the earlier 1.4 - 1.6 acre figures were rough estimates made without the benefit of an actual land survey.

I also measured the area in question (See attached Figure 1) using the Google Earth Pro utility that allows a polygon to be drawn on a satellite image and calculate the acreage of a given area. My calculation resulted in an area of 1.1 acres, which is consistent with the official survey results.

This information is important because it significantly reduces the area of CSS that will be impacted if the soil move is approved. It now closely approaches the usual one acre threshold under which de minimus consideration is normally approved.

The three attached memoranda from Vince Scheidt address, in addition to other issues, the functions and values (quality) of the CSS that would be impacted by the soil movement. The

memos point out factors that render the quality and sustainability of the CSS to be impacted as very low, including its small size, isolated and fragmented nature (no connectivity), and that it is bounded on the west by Interstate 15, on the east by Center City Parkway, and is otherwise surrounded by development. I concur with Mr. Scheidt's conclusion that the habitat in question is of extremely low quality and is unlikely to persist into the future given the factors mentioned above. Allowing impacts to this small patch of CSS is appropriate under these circumstances.

Lastly, three sets of protocol surveys for California Gnatcatchers *Polioptila californica* have been conducted over the years (as documented in the December 2020 Scheidt memo) and none have detected the species. Given its current condition it is unlikely that this very small patch of low quality habitat would support gnatcatchers.

As these are key discussion topics relevant to the Batching Meeting process, please forward this letter and its attachments to the meeting participants for their consideration.

If you have any questions or need additional clarification, please contact me at your convenience.

Sincerely,

William T. Everett
San Diego and Riverside County Approved Biological Consultant

Cc: Dr. Rajesh Kadakia, Jim Simmons, Kendalyn White

Attachments:

Letter from Project Surveyor, Mike Wunderlin
Scheidt Memo August 2019
Scheidt Memo March 2020
Schedit Memo December 2020

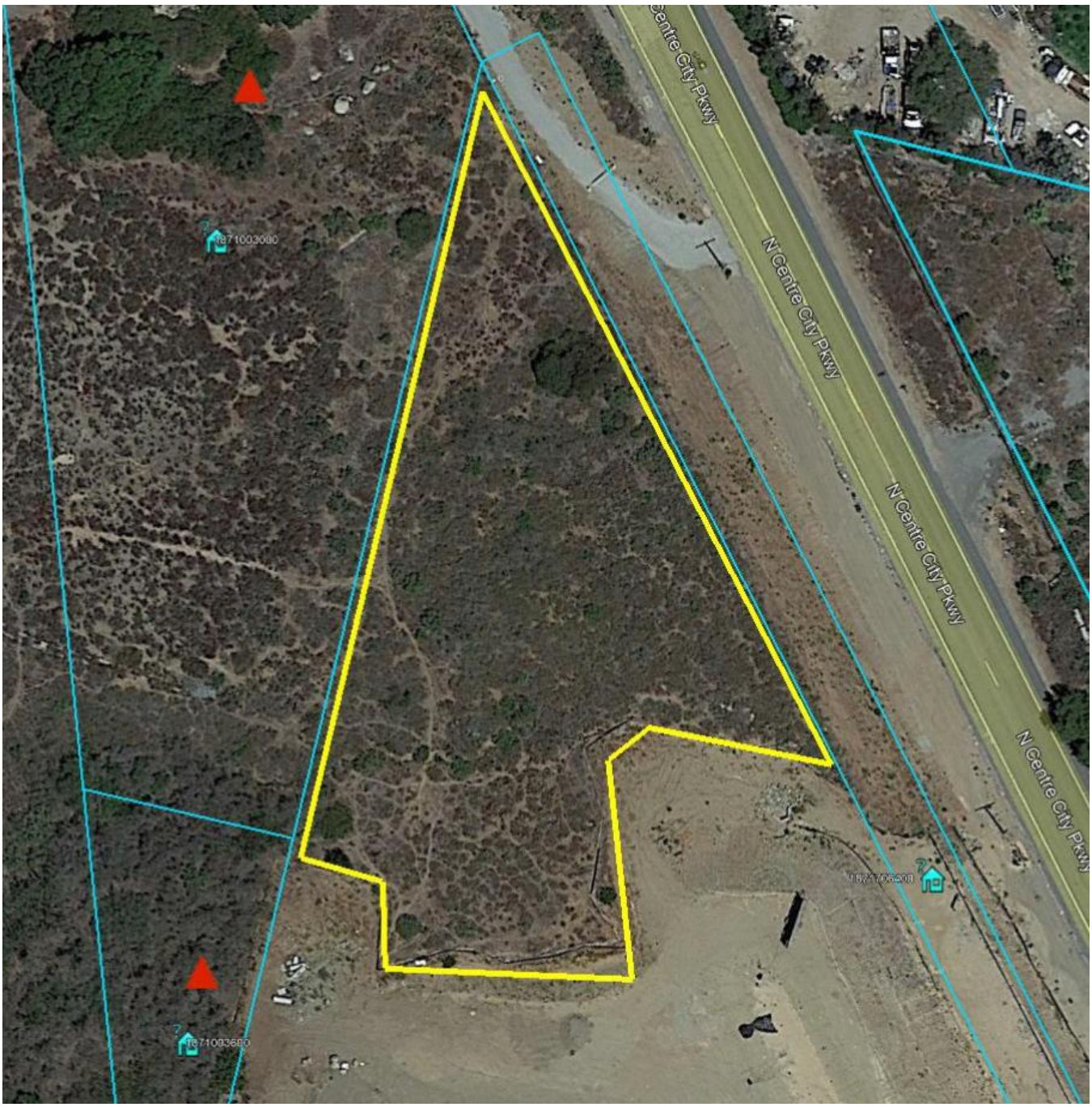


Figure 1. Area of CSS to be impacted ~1.1 Acres

WUNDERLIN ENGINEERING, INC.

March 08, 2021

Rajesh J. Kadakia, M.D.
Greens Global, Inc
910 South El Camino Real, Suite A
San Clemente, CA 92672
(949) 400-9492
rk@greensglobal.com

RE: Major Use Permit, PDS2005-3300-05-052 T&R Mini Storage, Area of Sensitive Vegetation on the North Lot, APN 187-170-62

Dear Dr. Kadakia,

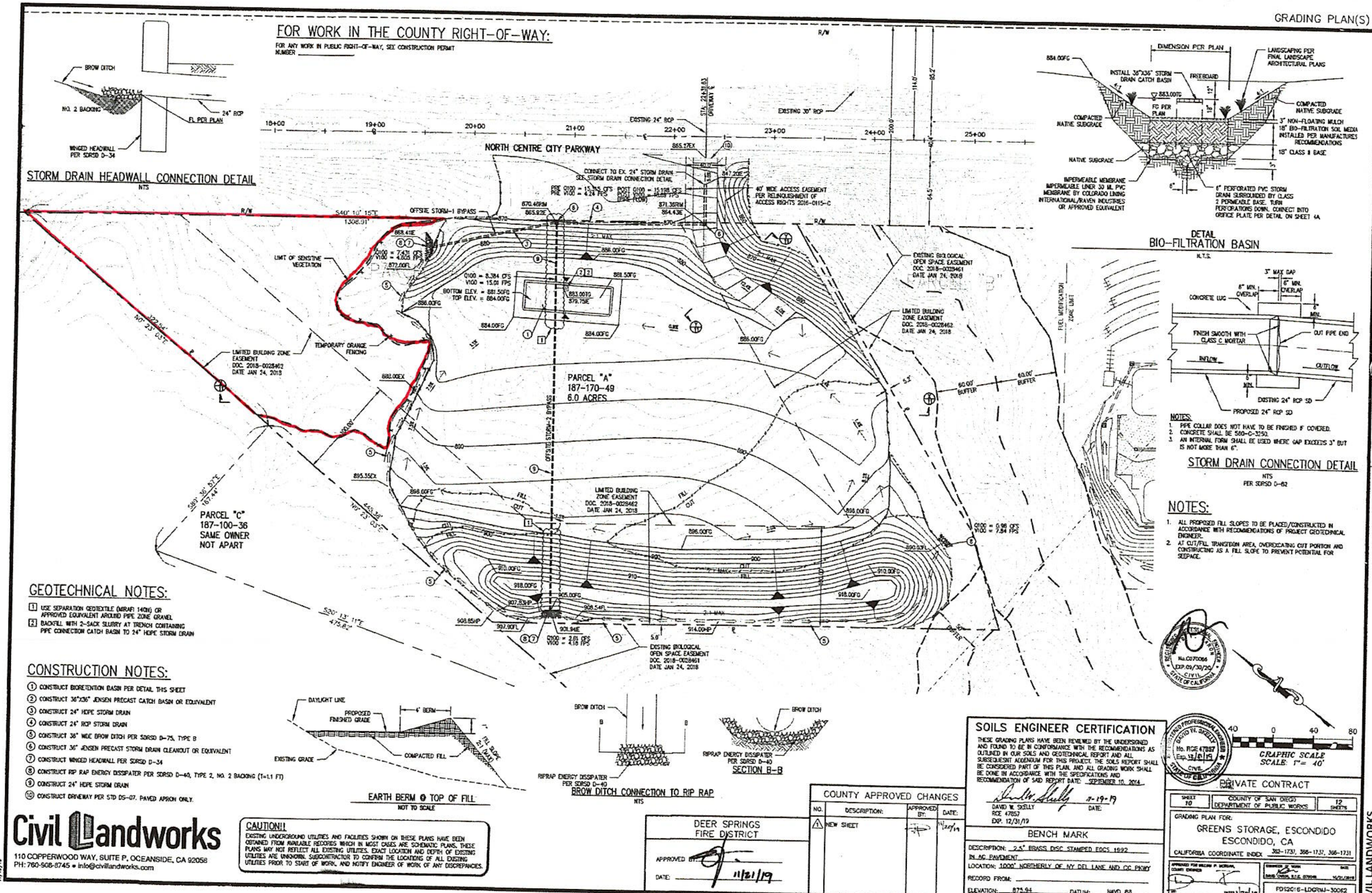
As part of the Grading Plan Change PDS2019-LDPCHG-00837, we Surveyed the Sensitive Vegetation Area of the North Lot, APN 187-170-62 as directed by Vince Scheidt, Project Biologist. The findings of this precise field survey are shown the Grading Plan Change on sheet 10.
The area of this Sensitive Vegetation Area is 1.1 acres.

Sincerely,

Michael Wunderlin
Wunderlin Engineering, Inc
LS 5210

LICENSED LAND SURVEYOR
MICHAEL A. WUNDERLIN
Exp. 6/30/23
No. 5210
STATE OF CALIFORNIA

P.O. BOX 461300 • ESCONDIDO, CA 92046 • tel (760) 644-2944 • email: WUNDERLINENG@GMAIL.COM


11/19/19
GRADING PLAN(S)
FOR WORK IN THE COUNTY RIGHT-OF-WAY:
FOR ANY WORK IN PUBLIC RIGHT-OF-WAY, SEE CONSTRUCTION PERMIT NUMBER
STORM DRAIN HEADWALL CONNECTION DETAIL
NTS
BROW DITCH
NO. 2 BACKING
24" RCP
FL PER PLAN
WINGED HEADWALL PER SDRSD D-34
NORTH CENTRE CITY PARKWAY
EXISTING 24" RCP
EXISTING 30" RCP
STA. 22+31.63 DRIVEWAY
CONNECT TO EX. 24" STORM DRAIN SEE STORM DRAIN CONNECTION DETAIL
40' WIDE ACCESS EASEMENT PER RELINQUISHMENT OF ACCESS RIGHTS 2016-0115-C
OFFSITE STORM-1 BYPASS
S40° 10' 15"E 1308.91'
LIMIT OF SENSITIVE VEGETATION
TEMPORARY ORANGE FENCING
LIMITED BUILDING ZONE EASEMENT DOC. 2018-0028462 DATE JAN 24, 2018
EXISTING BIOLOGICAL OPEN SPACE EASEMENT DOC. 2018-0028461 DATE JAN 24, 2018
PARCEL "A" 187-170-49 6.0 ACRES
PARCEL "C" 187-100-36 SAME OWNER NOT APART
OFFSITE STORM-2 BYPASS
BOTTOM ELEV. = 881.50FG
TOP ELEV. = 884.00FG
60.00' BUFFER
FUEL MODIFICATION ZONE LIMIT
DIMENSION PER PLAN
LANDSCAPING PER FINAL LANDSCAPE ARCHITECTURAL PLANS
INSTALL 36"X36" STORM DRAIN CATCH BASIN
FREEBOARD
COMPACTED NATIVE SUBGRADE
3" NON-FLOATING MULCH
18" BIO-FILTRATION SOIL MEDIA INSTALLED PER MANUFACTURES RECOMMENDATIONS
18" CLASS II BASE
NATIVE SUBGRADE
IMPERMEABLE MEMBRANE IMPERMEABLE LINER 30 ML PVC MEMBRANE BY COLORADO LINING INTERNATIONAL/RAVEN INDUSTRIES OR APPROVED EQUIVALENT
6" PERFORATED PVC STORM DRAIN SURROUNDED BY CLASS 2 PERMEABLE BASE. TURN PERFORATIONS DOWN. CONNECT INTO ORIFICE PLATE PER DETAIL ON SHEET 4A
DETAIL
BIO-FILTRATION BASIN
N.T.S.
3" MAX GAP
6" MIN. OVERLAP
CONCRETE LUG
FINISH SMOOTH WITH CLASS C MORTAR
CUT PIPE END
INFLOW
OUTFLOW
EXISTING 24" RCP SD
PROPOSED 24" RCP SD
NOTES:
1. PIPE COLLAR DOES NOT HAVE TO BE FINISHED IF COVERED.
2. CONCRETE SHALL BE 560-C-3250.
3. AN INTERNAL FORM SHALL BE USED WHERE GAP EXCEEDS 3" BUT IS NOT MORE THAN 6".
STORM DRAIN CONNECTION DETAIL
NTS
PER SDRSD D-62
NOTES:
1. ALL PROPOSED FILL SLOPES TO BE PLACED/CONSTRUCTED IN ACCORDANCE WITH RECOMMENDATIONS OF PROJECT GEOTECHNICAL ENGINEER.
2. AT CUT/FILL TRANSITION AREA, OVEREXCAVATING CUT PORTION AND CONSTRUCTING AS A FILL SLOPE TO PREVENT POTENTIAL FOR SEEPAGE.
GEOTECHNICAL NOTES:
1 USE SEPARATION GEOTEXTILE (MIRAFI 140N) OR APPROVED EQUIVALENT AROUND PIPE ZONE GRAVEL
2 BACKFILL WITH 2-SACK SLURRY AT TRENCH CONTAINING PIPE CONNECTION CATCH BASIN TO 24" HDPE STORM DRAIN
CONSTRUCTION NOTES:
1 CONSTRUCT BIORETENTION BASIN PER DETAIL THIS SHEET
2 CONSTRUCT 36"X36" JENSEN PRECAST CATCH BASIN OR EQUIVALENT
3 CONSTRUCT 24" HDPE STORM DRAIN
4 CONSTRUCT 24" RCP STORM DRAIN
5 CONSTRUCT 36" WIDE BROW DITCH PER SDRSD D-75, TYPE B
6 CONSTRUCT 30" JENSEN PRECAST STORM DRAIN CLEANOUT OR EQUIVALENT
7 CONSTRUCT WINGED HEADWALL PER SDRSD D-34
8 CONSTRUCT RIP RAP ENERGY DISSIPATER PER SDRSD D-40, TYPE 2, NO. 2 BACKING (T=1.1 FT)
9 CONSTRUCT 24" HDPE STORM DRAIN
10 CONSTRUCT DRIVEWAY PER STD DS-07. PAVED APRON ONLY.
DAYLIGHT LINE
PROPOSED FINISHED GRADE
4' BERM
EXISTING GRADE
COMPACTED FILL
FILL SLOPE 2:1 (MAX)
EARTH BERM @ TOP OF FILL
NOT TO SCALE
RIPRAP ENERGY DISSIPATER PER SDRSD D-40
BROW DITCH CONNECTION TO RIP RAP
NTS
SECTION B-B
Civil Landworks
110 COPPERWOOD WAY, SUITE P, OCEANSIDE, CA 92058
PH: 760-908-8745 • info@civillandworks.com
CAUTION!!
EXISTING UNDERGROUND UTILITIES AND FACILITIES SHOWN ON THESE PLANS HAVE BEEN OBTAINED FROM AVAILABLE RECORDS WHICH IN MOST CASES ARE SCHEMATIC PLANS. THESE PLANS MAY NOT REFLECT ALL EXISTING UTILITIES. EXACT LOCATION AND DEPTH OF EXISTING UTILITIES ARE UNKNOWN. SUBCONTRACTOR TO CONFIRM THE LOCATIONS OF ALL EXISTING UTILITIES PRIOR TO START OF WORK, AND NOTIFY ENGINEER OF WORK OF ANY DISCREPANCIES.
DEER SPRINGS FIRE DISTRICT
APPROVED BY:
DATE: 11/21/19
COUNTY APPROVED CHANGES
NO. DESCRIPTION: APPROVED BY: DATE:
NEW SHEET
SOILS ENGINEER CERTIFICATION
THESE GRADING PLANS HAVE BEEN REVIEWED BY THE UNDERSIGNED AND FOUND TO BE IN CONFORMANCE WITH THE RECOMMENDATIONS AS OUTLINED IN OUR SOILS AND GEOTECHNICAL REPORT AND ALL SUBSEQUENT ADDENDUM FOR THIS PROJECT. THE SOILS REPORT SHALL BE CONSIDERED PART OF THIS PLAN, AND ALL GRADING WORK SHALL BE DONE IN ACCORDANCE WITH THE SPECIFICATIONS AND RECOMMENDATION OF SAID REPORT DATE: SEPTEMBER 10, 2014
DAVID W. SKELLY RCE 47857 EXP. 12/31/19
DATE: 11-19-19
BENCH MARK
DESCRIPTION: 2.5" BRASS DISC STAMPED EOCS 1992 IN AC PAVEMENT
LOCATION: 1000' NORTHERLY OF NY DEL LANE AND CC PKWY
RECORD FROM:
ELEVATION: 875.94 DATUM: NAVD 88
GRAPHIC SCALE
SCALE: 1" = 40'
PRIVATE CONTRACT
SHEET 10 COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS 12 SHEETS
GRADING PLAN FOR:
GREENS STORAGE, ESCONDIDO
ESCONDIDO, CA
CALIFORNIA COORDINATE INDEX 362-1731, 366-1737, 366-1731
PDS2016-LDGRMJ-30062
NEW SHEET
CIVIL LANDWORKS
760-908-8745

VINCENT N. SCHEIDT
Biological Consultant

3158 Occidental Street • San Diego, CA • 92122-3205 • 858-457-3873 • 858-336-7106 cell • email: vince@san.rr.com

SUMMARY BIOLOGY REPORT
Biological Resources, Project Impacts, and Mitigation

T&R MINI STORAGE PROJECT
PDS2005-3300-05-052 & PDS2008-3710-08-0044
ENVIRONMENTAL LOG NO.: PDS2005-3910-0508031
APN 187-170-48 and -49
County of San Diego

Final May 2013

Summary

The T&R Mini-Storage project site consists of 31.7 acres of vacant land (APN 187-170-48-00 and APN 187-170-49-00) located at between I-15 and North Centre City Parkway in the Escondido area of unincorporated San Diego County, California. The project includes a boundary adjustment that will, once approved, remove 6.0 acres (Parcel "A") of future residential development area from the study site. Habitats onsite and surrounding the property include chaparral, scrub, non-native grassland, disturbed/developed, and riparian. The project as proposed will impact chaparral, scrub, non-native grassland, and disturbed/developed habitat. No mitigation for impacts to disturbed/developed habitat is required. However, impacts to non-native grassland and must be mitigated for at a 0.5:1 ratio, impacts to chaparral, to be inclusive of Special Status Species in the aggregate, must be mitigated for at a 1:1 ratio per a directive of the PDS, and impacts to scrub must be mitigated for at a 2:1 ratio pursuant to the requirements of the County of San Diego's Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. All riparian habitat areas will be avoided and buffered by design. It is recommended that mitigation for project impacts occur onsite via the recordation of a biological open space easement over undeveloped areas of the property. An alternative mitigation approach that involves offsite habitat preservation in a County-approved location is presented. Additional mitigation consisting of an avian nesting survey and/or seasonal restrictions on site development is recommended to provide project consistency with the Migratory Bird Treaty Act and the California Fish and Game Code.

Introduction, Project Description, Location, and Setting

The T&R Mini-Storage project consists of a proposal to construct a commercial storage facility on approximately 6.12 acres of the subject site. This includes fire clearing from the proposed structures. The project also includes a boundary adjustment that will remove 6.0 acres from the study site, although the analysis in this report includes this 6.0-acre area (Parcel "A"), which will be developed in the future for

residential purposes. The T&R Mini-Storage property is currently in a mostly natural state and vacant, although the central flat areas were disturbed in the past and are currently in a stabilized but unnatural condition. The proposed storage facility would consist of five buildings and associated internal driveways, parking areas, and related improvements. A security fence would surround the facility. Access to the site would be from North Centre City Parkway. Leach fields (septic area) are located at the northeast corner of the proposed facility. Fire clearing has been determined to extend 100 feet from buildings with the exception of the most westerly building, which will require 70 feet of fire clearing to the west and northwest.

The project site is located west of and fronting North Centre City Parkway and immediately east of Interstate Highway 15 in the Escondido area of unincorporated San Diego County (Figure 1). Various forms of chaparral, scrub, grassland, disturbed/developed, and riparian are the only plant communities (habitats) found onsite, with these same habitats also present offsite (Figure 2 and 3).

Biological field surveys of the T&R Mini-Storage project site have been completed by various investigators, including Samuel Reed (SR), W. McTeer (WM), Philippe Vergne (PV), and most recently Vincent Scheidt (VS), the author of this report. Survey data (dates, personnel, hours, study focus, and weather conditions) are presented in Table 1. Older biology reports for this property have been prepared by TeraCor (2003) and Helix Environmental (2009). Data from those older documents have been incorporated, where applicable, into this report. A new, directed California Gnatcatcher survey of a five-acre portion of the site by Robin Church (RC) has been completed (Attachment B).

The purpose of the site surveys was to identify the site's flora and fauna (Table 2), the onsite habitat-types (Figure 3), potential project-related impacts (Table 3), and mitigation, if required. A second purpose was to survey the site for the presence or absence of jurisdictional lands and various special status plant and animal species which are known to occur in the general vicinity of this property (Table 4).

Habitats/Vegetation Communities

The T&R Mini-Storage project site supports a diversity of native and non-native, naturalized vegetation types. The central section of the site, where development is proposed, supports various scrubs and other successional plant associations that have developed on old disturbed areas. The balance of the site is more-or-less natural. The plant communities associated with this project site include the following (Figure 3):

Coastal Scrub (Holland Code 32000) – 6.9 acre
Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat-type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage – Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC proper. Soft-woody shrubs are present in the Coastal Sage – Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of

CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Southern Mixed Chaparral (Holland Code 37120) – 20.9 acre
Southern Mixed Chaparral (SMC) vegetation covers the vast majority of the project site. This dense and impenetrable habitat is dominated by large, hard-woody shrubs, such as Chamise *(Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), and San Diego Mountain Mahogany *(Cercocarpus minutifolius).* SMC is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Non-native Grassland (Holland Code 42200) – 3.2 acre
Non-native Grassland (NNG) vegetation is found in the central area of the project site with a tiny patch on the northern property edge. This habitat is indicated by weedy annual Eurasian grasses, including Ripgut Brome *(Bromus diandrus),* Slender Wild Oat *(Avena barbata),* and many others. Native elements in the habitat include Slender-leaved Milkweed (*Asclepias fasciculatus*), Miniature Lupine *(Lupinus bicolor)*, Common Sand Aster (*Corethrogyne filaginifolia* var. *virgata*), and Fasciculated Tarplant *(Hemizonia fasciculata)*. NNG has the potential to be a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. This is because the County considers NNG to be significant raptor foraging habitat. The biological resource value of this habitat-type is low to moderate.

Southern Riparian Scrub (Holland Code 63300) – 0.03 acre
Southern Riparian Scrub (SRS) is found in a few tiny patches within the site's drainages. This habitat is indicated by Mule Fat *(Baccharis salicifolia)* and Arroyo Willow *(Salix lasiolepis)*. The surrounding vegetation consists of very dense SMC. SRS is a sensitive habitat-type in San Diego County, as defined by Guidelines for Determining Significance. The biological resource value of this habitat-type is moderate to high.

Disturbed/Developed Habitat (Holland Code 11300/12000) – 0.7 acre
The central section of the property supports a paved road and several laterals that qualify as Disturbed/Developed Habitat (DH). These areas support either no vegetation (bare dirt, pavement) or only sparse ruderal weeds such as Perennial Mustard (*Hirschfeldia incana)* and Tocalote *(Centaurea melitensis).* DH is a non-sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The areas mapped as DH have no biological value.

Flora and Fauna

One hundred and twelve species of vascular plants and sixty-three species of animals were detected during the field surveys of the property. These are listed in Table 2. This list represents a characteristic flora and fauna associated with this part of San Diego County in association with habitats similar to those found onsite.

Special Status Species

Special Status (or "sensitive") Species are those plants and animals listed as "Rare", "Threatened", "Endangered", "of Special Concern", or otherwise noteworthy by the County of San Diego, the California Department of Fish and Game (CDFG), the U.S. Fish and Wildlife Service (USFWS), the California Native Plant Society (CNPS), or other governmental or conservation agencies.

No sensitive plant species were observed during the survey, and given the nature of the onsite habitats, none are expected. A variety of sensitive plants are known from the general vicinity of the property, however. Most of these are either associated with habitats not found here (such as native grasslands, mafic chaparral, or vernal pools) or are large and distinctive perennials that would not have been missed if encountered onsite. Sensitive plants known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

One sensitive plant species reported as occurring onsite is Lakeside Ceanothus *(Ceanothus cyaneus)*. This is almost certainly a mis-identification as this species does not occur in northern San Diego County and no evidence for this very rare plant was detected during the 2007 or 2011/2012 field surveys.

Thirteen sensitive animal species were observed on the T&R Mini-Storage project site during the field surveys:

San Diego Coast Horned Lizard *(Phrynosoma coronatum blainvillei)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Northern California though coastal southern California into northern Baja California
Habitat: Open areas of scrub, chaparral and grassland in the presence of native harvester ant *(Pogonomyrmex* sp.*)*, which is the primary prey item for this lizard.
Status on site: A single individual was observed by others in the central portion of the site.

Coastal Western Whiptail *(Cnemidophorus tigris multiscutatus)*
Listing: State status: none
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)
Distribution: Cismontane areas of southern California south into Baja California Norte, Mexico
Habitat: Mainly inhabits coastal sage scrub and chaparral where it occurs in areas of friable soils on hillsides and in canyons but also may be found in open, dry riparian areas..
Status on site: Three individuals were observed by others in central portion of the site.

Cooper's Hawk *(Accipiter cooperii)*
Listing: "Species of Local Concern" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Watch List" (CDFG, 2009)
Distribution: Occurs throughout most of North America, from northern Mexico to southern Canada
Habitat: Inhabits a variety of woodlands, including oak woodlands, riparian and coniferous forests
Status on site: Observed by others in the northern portion of the site.

Bell's Sage Sparrow *(Amphispiza belli belli)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
Distribution: Cismontane areas of southern California and northern Baja California, Mexico. Also found on the west slopes of the Sierra Nevada Mountains
Habitat: Coastal Sage Scrub and chaparral. May also occur in other habitats such as juniper woodland and alluvial fan scrub
Status on site: Observed by others in sage scrub in two locations in the central portion of the site.

Red-shouldered Hawk *(Buteo lineatus)*
Listing: "Blue List" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Occurs over large areas of central and southern California west of the Sierras. Also occurs in Mexico, southeastern Canada, and the eastern United States.
Habitat: Roost and nest in a variety of woodland habitats: eucalyptus woodlands, oak groves, open riparian forests, and related broken wooded areas.
Status on Site: Single specimen was seen flying over the northern portion of the site

Turkey Vulture *(Cathartes aura)*
Listing: "Blue-list" (Tate, 1986)
"Declining" (Unitt, 1984)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Ranges from southern Canada to Argentina
Habitat: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.
Status on site: Several specimens were observed soaring overhead.

Barn Owl *(Tyto alba)*
Listing: "Blue-list" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal/State status: none
Distribution: Nearly worldwide in tropical and temperate regions
Habitat: In southern California, Barn Owls range and forage widely, nesting in many types of open cavities. Specimens roost in areas of thick vegetation or in buildings (hence the common name).
Status on site: Observed by others in the northern portion of the site

Yellow Warbler *(Dendroica petechia brewsteri)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Nesting typically occurs in willow-dominated riparian areas from Canada to northern Mexico. Specimens overwinter in the area from Mexico south to South America. Yellow Warblers are found throughout San Diego County.
Habitat: Yellow Warblers breed during the summer in moist wooded habitats; however, they can be found most everywhere during migration. In San Diego County they are typically found in riparian thickets.

Status on site: Migratory specimens observed by others flying through the site during migration.

San Diego Black-tailed Jackrabbit *(Lepus californicus bennettii)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Cismontane and transmontane areas of southern California and adjacent areas of northern Baja California, Mexico
Habitat: Associated with areas of open chaparral, scrub, and grassland vegetation
Status on Site: San Diego Black-tailed Jackrabbit is a relatively common species on the subject property, with several observations made by others during the site surveys.

Mule Deer *(Odocoileus hemionus)*
Listing: State status: Regulated Game Animal (CDFG, 2012)
County status: San Diego County Sensitive Animal List (DPLU, 2010), Group 2; "MSCP Indicator" (DPLU, 1993)
Federal status: none
Distribution: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)
Habitat: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats; occasionally by sightings of specimens themselves
Status on site: Scat from this species was observed by others in NNG and CSS.

San Diego Desert Woodrat *(Neotoma lepida intermedia)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Coastal and desert areas of Southern California
Habitat: Open, dry, rocky hillsides in coastal sage scrub and chaparral
Status on site: Observed by others in the northern and central portions of the site.

White-tailed Kite / *Elanus leucurus*
Listing: "Fully Protected Raptor" (CDFG, 1999)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Fully Protected" (CDFG Code Sections 3511, 4700, 5050 & 5515)
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: White-tailed Kites breed primarily along the coastal lowland, and the species occurs over a broad area of the western U.S. through Mexico and into South America.
Habitat(s): Roost and nest in a variety of woodland habitats. Mainly riparian woodlands, oak groves, related habitats.
Status onsite: Single specimen observed during 2007 focused California Gnatcatcher survey. This species likely forages onsite on occasion due to the openness of the habitat.
Comments: Population numbers in San Diego County appear to have increased since the 1950's, and this species is not currently considered threatened or endangered.

Northwestern San Diego Pocket Mouse *(Chaetodipus fallax fallax)*
Listing: State status: "Species of Special Concern" (CDFG, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: "Species of Concern" (USFWS, 2005)
Distribution: Occurs in Southwestern California, with subspecies *fallax* occurring on the coastal side of the mountains.

Habitat: Found in open areas of sage scrub, chaparral, and related open habitats
Status on site: Observed by others in the northern and central portions of the site.

A number of additional sensitive animals are known from general vicinity of property, however. Some of these have a reasonable probability of occurring on or utilizing this site, at least on an occasional basis. These include various native bats *(Choeronycteris, Eumops, Antrozous, Macrotus, Myotis, Nyctinomops)*, and other nocturnal or cryptic species. Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

Directed Field Survey for California Gnatcatcher

California Gnatcatcher *(Polioptila californica)*, a federally-listed Threatened Species, is known from habitat similar to that found on the T&R Mini-Storage project site. Gnatcatchers occur in coastal and interior areas of coastal sage and related scrub habitats typically dominated by California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. Presence/absence field surveys for California Gnatcatcher were conducted by TeraCor biologist Samuel Reed in 2001 and again 2007. An updated gnatcatcher survey of the project development area, plus buffer, was completed by the Mrs. Robin Church of RC Biological Consulting, Inc. in 2012 (Attachment B).

No California Gnatcatchers were detected on the T&R Mini-Storage project site during any of the field surveys, including the 2012 survey of a portion of the site. For this reason, the site is considered "unoccupied" by this federally-listed Threatened Species.

Jurisdictional Wetlands and Waterways – Wetland Survey

Wetlands and jurisdictional "waters" are present on the project site in association with the onsite drainages and tributaries. These areas of the site support hydrophytes, hydric soils, and/or wetlands hydrology.

A directed RPO wetland survey was completed as a part of the biology study of the subject project site. This resulted in the preparation of a Wetland Survey Report (Attachment A). The project as proposed will not impact any jurisdictional wetlands or "waters", including RPO wetlands.

Other Unique Features/Resources

The T&R Mini-Storage project site does not support any regionally-unique land features. The native and naturalized habitats found on this site are not unique to this area, and the property does not support any unusual biological features.

The site provides foraging habitat for various locally common species of raptors and other carnivores. No wildlife nursery sites were detected although faunal reproduction clearly does take place onsite in many areas, including underground, in bird nests, etc. There is potential for large mammals to use the site, and Mule Deer *(Odocoileus hemionus)* scat was reported to have been observed. This is in addition to other,

urban-tolerant species such as skunks, coyotes, raccoons, etc. The probability for Mountain Lion *(Felix concolor)* to use the site is considered low.

The project falls entirely within the "I-15 corridor", and area of known passage for species such as California Gnatcatcher and others that move along the fragmented archipelago of CSS and other habitats from Escondido north to Riverside County. The T&R Mini-Storage project has been redesigned several times to retain a functioning wildlife corridor that runs north-south within the property. Earlier designs provided an onsite corridor that was less than 37 feet in width. The current design provides a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the I-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement.

Significance of Project Impacts and Proposed Mitigation

The T&R Mini-Storage project is subject to review under the California Environmental Quality Act (CEQA) and required to provide compliance with the County's RPO and Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. This means that the County requires that project-related impacts to biological resources be "less than significant", as defined by CEQA, and that all RPO requirements and the Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources be met. This usually requires the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". Project-related impacts, as we have identified them, are presented in Table 2.

Pursuant to the NCCP and the Habitat Loss Permit Ordinance #8365 of the San Diego County Code, the applicant may be required to obtain a Habitat Loss Permit (HLP) to "cover" impacts to the CSS habitat onsite. The total site supports about 6.9 acres of this vegetation, with approximately 2.8 acres of this total that will be impacted by development. The T&R Mini-Storage project site is considered "unoccupied" by the California Gnatcatcher.

Direct and Indirect Impacts

Development of the T&R Mini-Storage project site as proposed will result in a number of project-related direct and indirect impacts. Direct impacts result from the actual removal of habitat, plants, and animals from the site through brushing clearing and grading. These direct impacts are considered permanent because they result in a conversion of habitats to buildings, landscaped areas, roads, etc. Indirect impacts also affect plants, animals, and habitats that occur on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". The indirect impacts associated with site conversion are less quantifiable, due to the uncertainty associated with edge effects.

The following project-related impacts have been identified with construction of the T&R Mini-Storage project:

- 2.8 acres of CSS will be impacted by development. This impact is considered **significant** as defined by CEQA. CEQA, the County of San Diego, and the Wildlife Agencies pursuant to the HLP ordinance require mitigation for this loss.
- 1.9 acre of SMC will be impacted by development. In the professional opinion of the project biologist, this impact is considered **less than significant** from a regional perspective, pursuant to CEQA, as it represents less than ten percent of the onsite habitat and is a very small quantity. However, the County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.4 acre of NNG will be impacted by development. In the professional opinion of the project biologist, this impact is considered **less than significant** from a regional perspective, as defined by CEQA as it is less highly fragmented and entirely successional. However, the County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- The project will impact habitat for at least thirteen Special States Species, including five Group 1 bird species and eight Group 2 species. In the professional opinion of the project biologist, impacts to these species, individually and in the aggregate, are considered **less than significant** from a regional perspective, pursuant to CEQA. These represent a tiny fraction of the total numbers found in San Diego County, and some are actually common (e.g.: Red-shouldered Hawk). None of the Group 1 species will be directly impacted, although there will be a minor loss (~ 6 acres) of foraging habitat. However, the County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- The project as currently designed will impact a functioning wildlife corridor that runs north-south within the "I-15 corridor". Impacts to this corridor are considered **less than significant** because adequate corridor width (315' onsite plus 100' offsite) will be maintained and open space may be placed over the corridor area to preserve the biological resources within it in perpetuity.

Cumulative Impacts

Cumulative impacts refer to a proposed project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects (Public Resources Code § 21083; California Code of Regulations, Title 14, § 15064[h], 15065[c], 15130, and 15355). Cumulative impacts can occur when individually minor but collectively significant projects take place over time.

A list of past, present and future projects that could cumulatively contribute to the projects significant impacts was compiled based on the defined study area. The study area was determined based on several factors including land use, habitats, draft North County MSCP boundaries and species ranges. The general boundaries of this study area extend from the draft North County MSCP PAMA boundaries to the north adjacent to Tierra Libertia Road, the Escondido city limits to the south and west and the draft North County MSCP PAMA boundaries to the east, approximately half the distance to North Broadway. The list of cumulative projects within this study area is as follows:

AD 07-057	HARTMAN, AD, LOT CLEARING

MUP 99-007	DRAGOO WINERY
MUP 04-050	RANCHO VERONA, MUP, GROUP RESIDENTIAL
MUP 10-003	CORTEL MUP CELL SITE TMO SD6110, P10-003
MUP 10-027	DOUGHERTY PET RESORT/MUP 10-027
MUP 84-112-01	THUNDERBIRD GOLF DRIVING RANGE
MUP 84-112-02	PRACTICE PERFECT GOLF RANGE
ZAP 02-032	JESMOND DENE / SPRINT
ZAP 00-145	SPRINT SDG&E / SPRINT
ZAP 00-059	WILLIAMS COMMUNICATIONS
STP 01-034	MESA ROCK RESIDENCE SITE PLAN
STP 01-045	LANTIS SITE PLAN
STP 03-019	CRV ESCONDIDO 68 SITE PLAN
STP 03-020	MONTREUX MODEL HOME
STP 99-038	HERALD LANTIS
STP 04-025	SITE PLAN FOR SFD IN I-15 CORRIDOR
STP 05-030	MONTREUX
STP 07-041	HARTMAN/STP/EASY TURF STORAGE BLDG
STP 08-015	ADJ HOLDINGS, SITE PLAN I-15 REVIEW, S 0
TM 5114	MONTREUX TM
TPM 19895	STEPHENS 4 LOT SPLIT - TPM
TPM 20420	LANTIS TPM
TPM 20879	KNOX TENTATIVE PARCEL MAP
TPM 21192	RUA MICHELLE, TPM 21192

Cumulative projects within the geographic scope of analysis would have the potential to result in impacts to Special Status Species, including various plants and animals, including loss of habitat. Of the 24 cumulative projects analyzed, 17 were either withdrawn or determined not to result in impacts to biological resources. The remaining 7 cumulative projects have the potential to impact habitat and sensitive species through clearing, grading, grubbing, trenching, and other construction activities.

The project would impact 2.8 acres of CSS, 1.9 acres of SMC, and 1.4 acres of NNG. These vegetation types are relatively well distributed in San Diego County, although all are sensitive and depleted in many areas. Therefore, from a regional perspective, the relatively minor impacts to the above vegetation types, although adverse and significant, are not cumulatively considerable when viewed in connection with the substantial acreages these habitat types remaining in the San Diego County region.

Impacts to the above habitats will be mitigated for in kind, reducing impacts to a level below significance. Thirteen sensitive species were observed on the project site: San Diego Coast Horned Lizard (*Phrynosoma coronatum blainvillei*), Coastal Western Whiptail (*Cnemidophorus tigris multiscutatus*), Cooper's Hawk (*Accipiter cooperii*), Red-shouldered Hawk (*Buteo lineatus*), Turkey Vulture (*Cathartes aura*), Barn Owl (*Tyto alba*), Yellow Warbler (*Dendroica petechia brewsteri*), San Diego Black-tailed Jackrabbit (*Lepus californicus bennettii*), Mule Deer (*Odocoileus hemionus*), San Diego Desert Woodrat (*Neotoma lepida intermedia*), White-tailed Kite (*Elanus leucrus*) and Northwestern San Diego Pocket Mouse (*Chaetodipus fallax fallax*). Impacts to these species, although adverse and potentially significant, are not cumulatively considerable when viewed in connection with the substantial numbers of these species remaining in the San Diego County region.

Furthermore, the project falls entirely within the "I-15 corridor", an area of known passage for species such as California gnatcatcher and others that move along the fragmented archipelago of coastal sage scrub and other habitats from Escondido north to Riverside County. The project has been designed to retain a functioning wildlife corridor that runs north-south within the property. The project would provide a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the 1-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement. With the condition to provide onsite open space over the existing wildlife corridor, the project would result in a less than significant impact to wildlife movement and would not result in a cumulatively considerable impact to wildlife movement in the study area.

In summary, with the mitigation requirements for biological resources on this site, the project would not result in cumulatively considerable impacts on sensitive habitats, sensitive species or existing wildlife movement.

Proposed Mitigation

As discussed above, no specific mitigation for impacts to DH is required. In order to satisfy the requirements of CEQA, the HLP ordinance, the County's "Guidelines for Determining Significance", and current County policy for mitigating impacts to habitats, Special Status Species, and Wildlife Corridor function, the following mitigation measures are recommended:

1. The project shall provide mitigation at a 2:1 ratio for impacts to up to 2.8 acres of CSS. This is equivalent to 5.6 acre of required mitigation. In this instance, it is recommended that this mitigation obligation for CSS impacts be satisfied onsite via the dedication of a Biological Open Space Easement over 2.3 acres of this habitat (Figure 4) plus offsite via the securement of no less than 3.3 acre-credits of CSS or "better" in a County-approved location. The Red Mountain Conservation Bank is an approved habitat bank offering mitigation credits that can satisfy the offsite mitigation requirement, although the applicant may elect to provide the necessary in any County and Wildlife Agency-approved location in the draft North County Multiple Species Conservation Program (MSCP) Subarea Planning Area.

2. The project shall provide mitigation at a 1:1 ratio for impacts to up to 1.9 acres of SMC. This is equivalent to 1.9 acres of required mitigation. It is recommended that this 1.9-acre mitigation obligation for SMC impacts be satisfied entirely onsite via the dedication of Biological Open Space known to support no less than 1.9 acres of this habitat (Figure 4).

3. The project shall provide mitigation at a 0.5:1 ratio for impacts to up to 1.4 acres of NNG. This is equivalent to 0.7 acre of required mitigation. It is recommended that this 0.7-acre mitigation obligation for NNG impacts be satisfied entirely onsite via the dedication of Biological Open Space known to support no less than 0.7 acre of this habitat (Figure 4).

4. Independent of providing the above habitat mitigation (recommendations #1-3), the preservation of other undisturbed areas of the site, particularly those to the west of the proposed facility is recommended. This will provide a minimum of 315 feet of onsite corridor width which, when

combined with offsite areas in the I-15 right-of-way, will conserve up to 415 feet of a functioning wildlife corridor.

5. A great deal of debris, old asphalt, construction rubble, etc is located in the onsite wildlife corridor. The removal of this material is recommended in order to provide better habitat connectivity across the disturbed area. All site clean-up should be completed under the supervision of a County-approved biological consultant. Following site clean-up, appropriate open space signage and/or fencing must be installed. To that end, it is recommended that a Wildlife Corridor Enhancement (Revegetation) Plan be prepared as a condition of project approval. This Plan would contain details of open space signage and/or possible fencing as appropriate. At a minimum, the developed areas of the site should be fenced with high-tensile, chain-link, or other sturdy fence material no less than 5 feet in height with signs posted at no more than 100-foot intervals. The signs should read:

> ***"Sensitive Environmental Resources***
> ***Area Restricted by Easement***
>
> *Unauthorized entry is restricted. To report a violation or for more information about easement restrictions and exceptions, contact the County of San Diego, Department of Planning and Land Use*
> *Reference: 3300 05-052 (MUP): P05-052"*

6. No specific mitigation for impacts to the site's sensitive species is required. As promulgated by California's Natural Communities Conservation Program (NCCP), the loss of sensitive species will presumably be compensated for by the conservation of onsite and offsite habitat lands that theoretically support such species. This includes the four Group 1 and eight Group 2 animals being impacted by the project. The proposed mitigation site directly benefits the impacted Group 1 species by protecting a functioning component of the I-15 wildlife corridor. Benefit to impacted Group 1 species is required pursuant to the County of San Diego Report Format and Content Requirements for Biological Resources, which requires species-based mitigation for all Group 1 species. County Staff has indicted that additional mitigation is required for the Group 1 species. Staff is recommending that the mitigation ratio for SMC be increased from the standard of 0.5:1 to 1:1. It is clear that this increased mitigation ratio can be accomplished within the on-site open space, which contains an excess of chaparral habitat. Therefore, the mitigation obligation will be increased to 1.9 acre (1.9 @ 1:1) per the directive of the PDS.

7. Site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird nesting location should not take place during the spring/summer songbird breeding season, defined as from 1 January to 31 August of each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prevents the "take" of eggs, nests, feathers, or other parts of most native bird species, and the Endangered Species Act. Limiting activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors.

Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 300 feet of the proposed activity will be required. The results of the survey will be provided in a report to the Director, Department of Planning and Development Services and the Wildlife Agencies for concurrence with the conclusions and recommendations.

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Preparer and Persons/Organizations Contacted

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Attachments

Figure 1. Regional Location
Figure 2. Recent Aerial Photograph
Figure 3. Biological Resources
Figure 4. Onsite BOSE Alternative

Table 1. Field Surveys
Table 2 Flora and Fauna Detected
Table 3. Impact/Mitigation Analysis
Table 4. Sensitive Species Known from the Vicinity

Attachment A. RPO Wetland Survey Report – T&R Mini-Storage Project
Attachment B. California Gnatcatcher Survey Report

Figure 1. Regional Location – T&R Mini-Storage Project Site
Portion of the U.S.G.S "Valley Center, California" 7.5′ Quadrangle

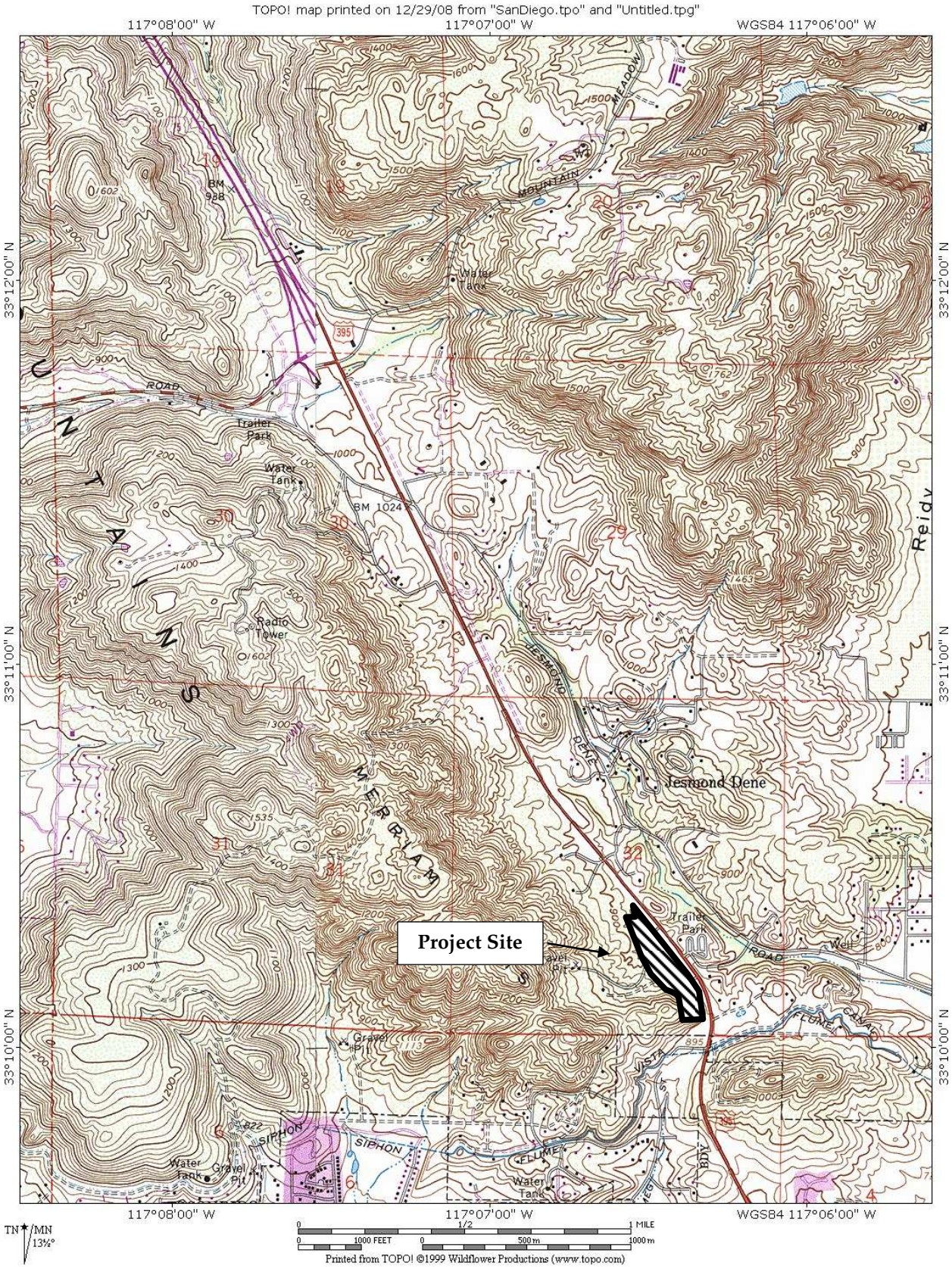

Figure 2. Recent Aerial Photograph – T&R Mini-Storage Project Site

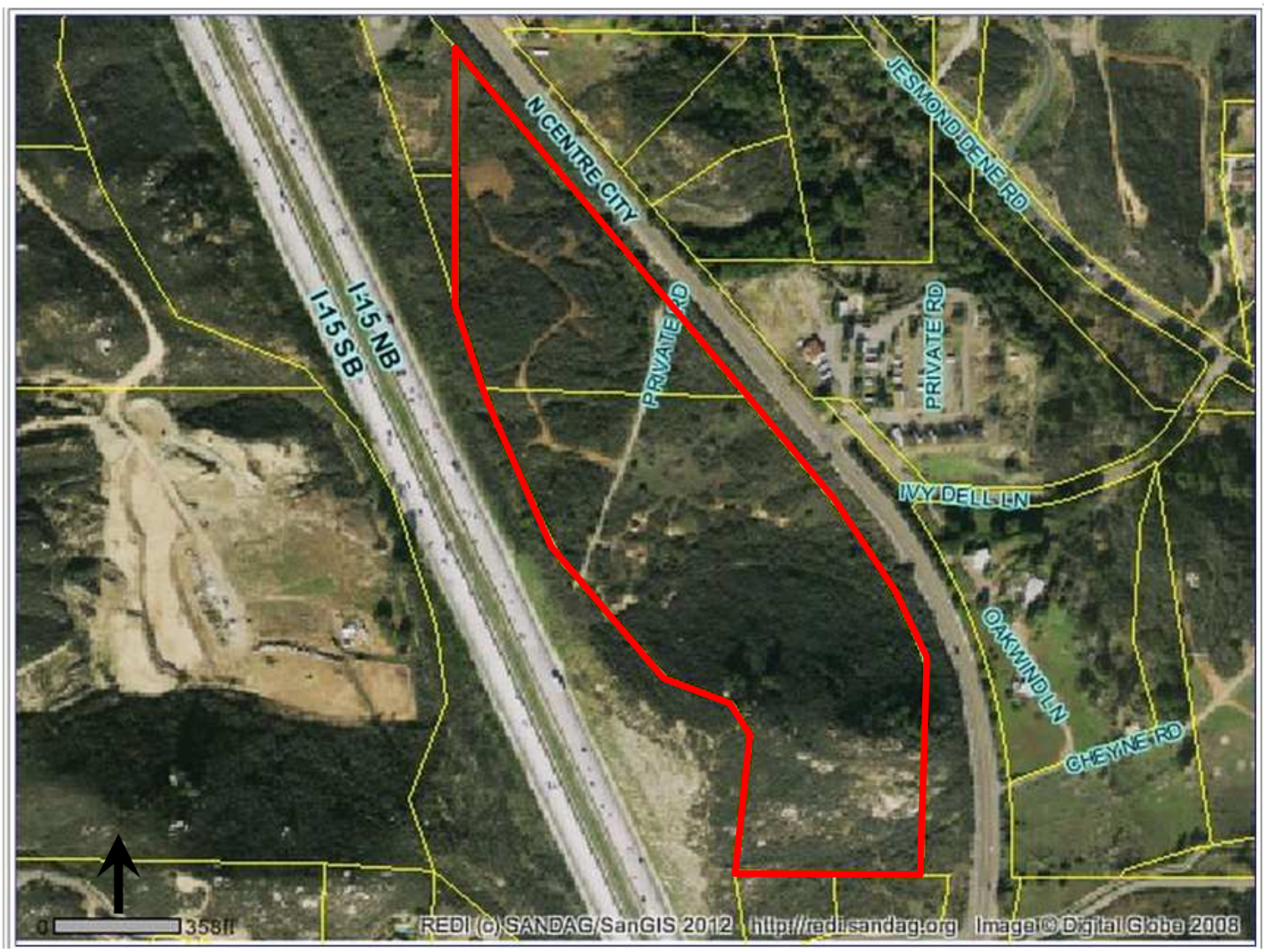

Figure 3. Biological Resources – T&R Mini-Storage Project Site

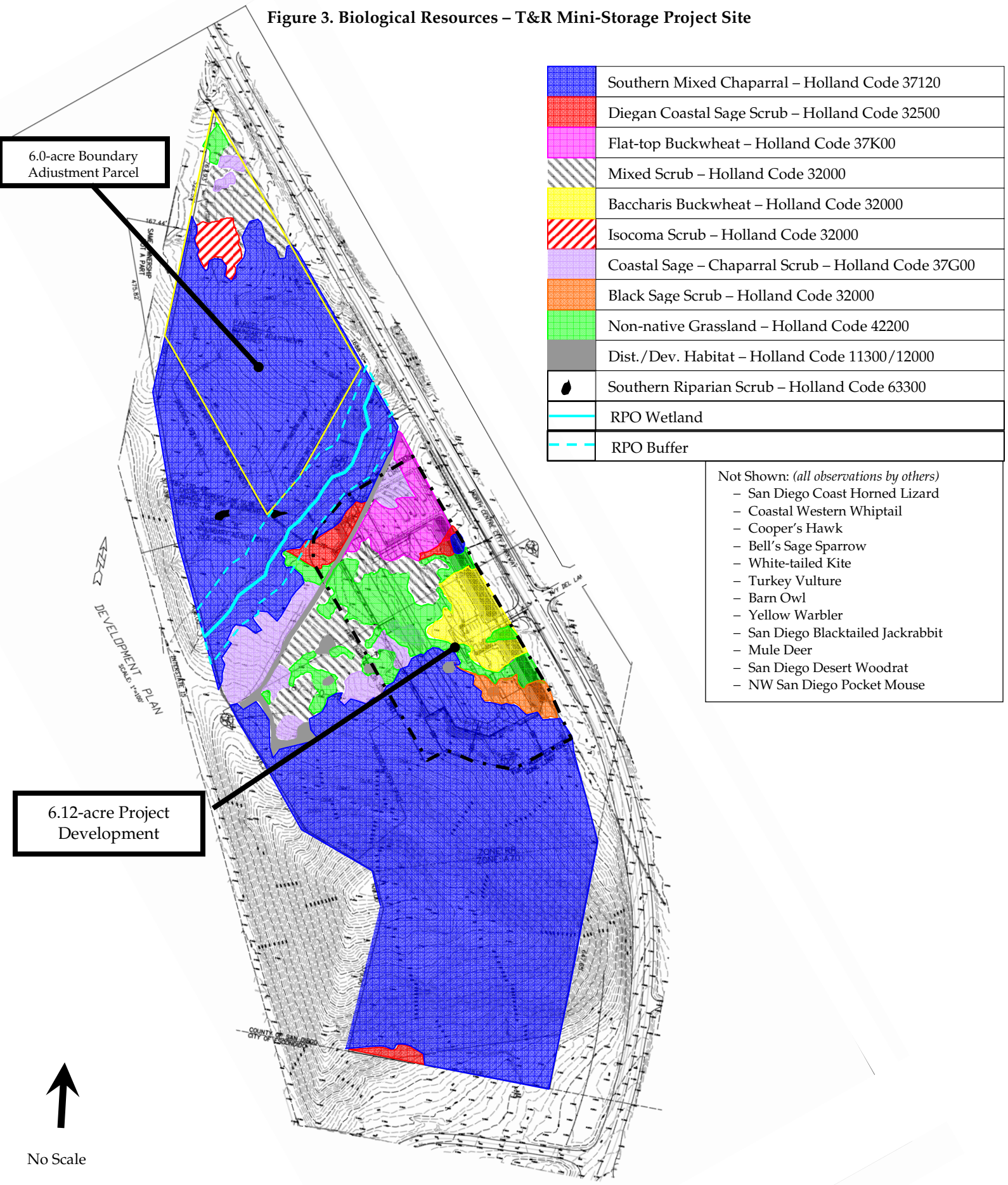

Figure 4. Onsite Biological Open Space Easement Alternative – T&R Mini-Storage Project Site

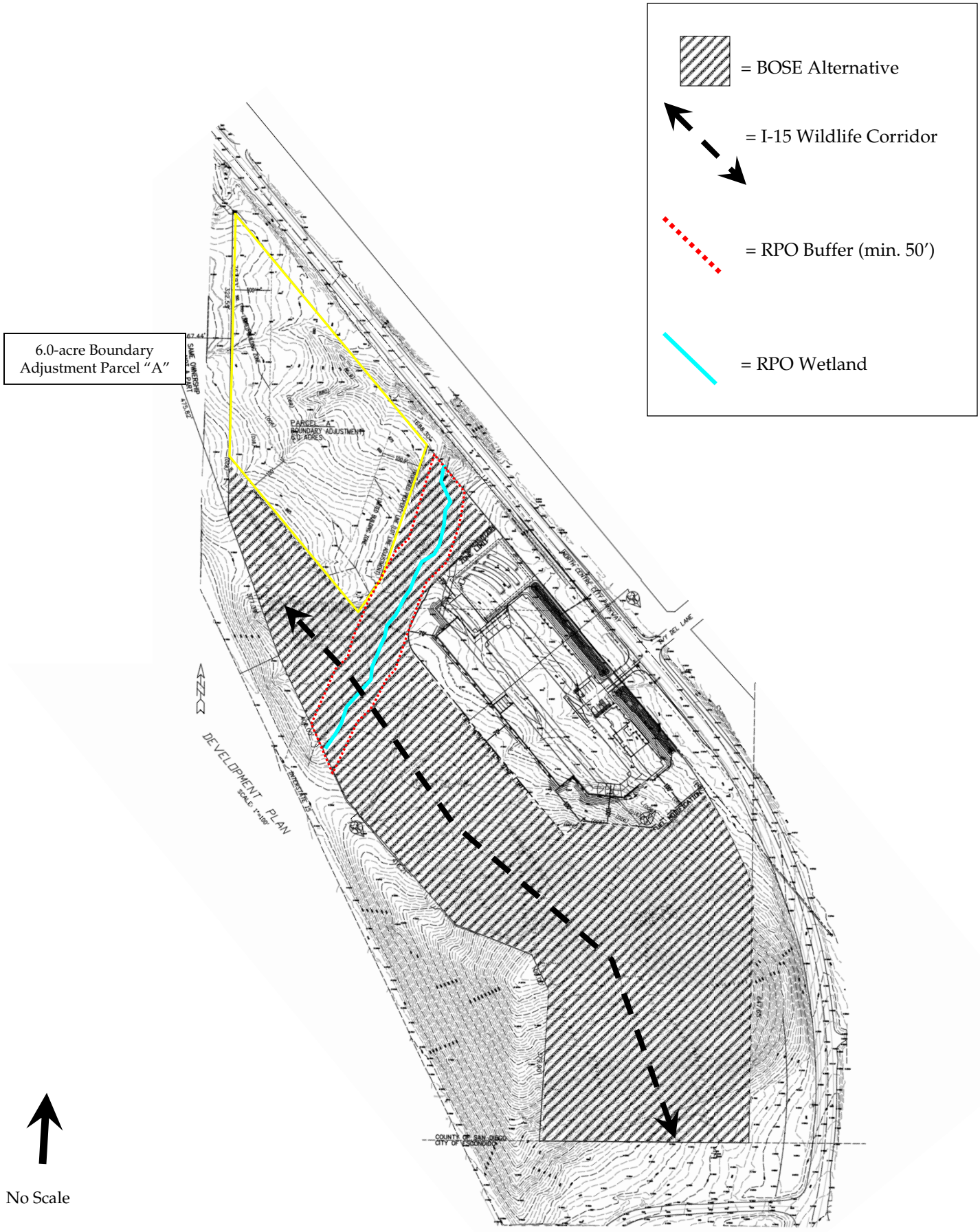

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
05 Mar 2001	SR	n/a[1]	Quino	n/a
16 Mar 2001	SR	n/a	Quino	n/a
24 Mar 2001	SR	n/a	Gnatcatcher	n/a
25 Mar 2001	SR	n/a	Quino	n/a
31 Mar 2001	SR	n/a	Gnatcatcher	n/a
03 Apr 2001	SR	n/a	Quino	n/a
13 Apr 2001	SR	n/a	Gnatcatcher + Quino	n/a
06 Dec 2002	SR	n/a	General	n/a
15 Jan 2003	SR, WM	n/a	General + Mapping	n/a
20 Jan 2003	SR, WM	n/a	General + Mapping	n/a
23 Jan 2003	SR, WM	n/a	General + Mapping	n/a
26 Jan 2003	SR, WM	n/a	General + Mapping	n/a
10 Mar 2003	SR ?	n/a	Wetlands	n/a
01 Apr 2003	SR ?	n/a	Wetlands	n/a
08 May 2003	SR	n/a	Floral	n/a

[1] *n/a – data not available*

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
30 Mar 2007	SR ?	n/a	Gnatcatcher	n/a
07 Apr 2007	SR	n/a	Gnatcatcher	n/a
15 Apr 2007	SR ?	n/a	Gnatcatcher	n/a
18 Apr 2007	PV	n/a	Kangaroo Rat	n/a
19 Apr 2007	PV	n/a	Kangaroo Rat	n/a
20 Apr 2007	PV	n/a	Kangaroo Rat	n/a
22 Apr 2007	PV	n/a	Kangaroo Rat	n/a
23 Apr 2007	PV	n/a	Kangaroo Rat	n/a
24 Apr 2007	PV	n/a	Kangaroo Rat	n/a
02 May 2007	SR ?	n/a	Gnatcatcher	n/a
15 May 2007	SR ?	n/a	Gnatcatcher	n/a
22 May 2007	SR ?	n/a	Gnatcatcher	n/a
27 Sep 2011	VS	10:00-12:45	General	Clear skies, temps in the high 70°s to low 90°s, no wind
12 Oct 2011	VS	08:45-12:30	General + Mapping	Clear skies, temps in the low 80°s to high 90°s, no wind
06 Jan 2012	VS	08:45-12:30	General + Wetlands	Clear skies, temps in the low 60°s, no wind

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants	
Adenostoma fasciculatum	Chamise
Amsinckia sp.	Fiddleneck
Antirrhinum nuttallianum	Nuttall's Snapdragon
Artemisia californica	California Sagebrush
Artemisia douglasiana	Mugwort
Asclepias fasciculatus	Slender-leaved Milkweed
*Avena barbata**	Slender Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis salicifolia	Mule Fat
Baccharis sarothroides	Broom Baccharis
*Brassica nigra **	Black Mustard
Brickellia californica	Bricklebush
*Bromus diandrus **	Ripgut Brome
*Bromus mollis **	Soft Brome
*Bromus rubens **	Red Brome
Calystegia macrostegia	Morning-Glory
Camissonia hirtella	Evening Primrose
Capsella bursa-pastoris	Shepherd's Purse
*Carduus pycnocephalus **	Italian Thistle
Castilleja densiflora	Parish's Owl's-Clover
Ceanothus tomentosus	Woolly-Leaf Ceanothus
*Centaurea melitensis **	Tocalote
Cercocarpus minutifolius	San Diego Mountain-Mahogany
Cirsium californicum	California Thistle
*Cirsium sp.**	Thistle
Claytonia parviflora	Narrow-leaved Miner's Lettuce
Clematis pauciflora	Rope-vine
Corethrogyne filaginifolia var. *virgata*	Common Sand Aster
Crassula connata	Pygmy-weed
Cryptantha intermedia	Common Cryptantha
Cuscuta californica	Dodder
Cyperus sp.	Sedge
Dicentra chrysantha	Golden Eardrops
Dichelostemma pulchellum	Blue Dicks
Dudleya pulverulenta	Chalk Live-forever
*Encelia farinosa **	Brittle Bush
Eriogonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
*Erodium cicutarium**	Filaree
Eucrypta chrysanthemifolia	Common Eucrypta
*Euphorbia peplus**	Petty Spurge
*Filago gallica**	Narrow-leaf Filago
Foeniculum vulgare	Fennel
Galium sp.	Bedstraw
Gnaphalium bicolor	Bicolored Cudweed
Gnaphalium purpureum	Cudweed
Gnaphalium stramineum	Cudweed
Haplopappus squarrosa	Saw-Toothed Goldenbush
Helianthemum scoparium	Peak Rush-Rose
Helianthus gracilentus	Sunflower

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants (cont)	
Hemizonia fasciculata	Fasciculated Tarplant
Heteromeles arbutifloia	Toyon
*Hirschfeldia incana**	Perennial Mustard
Hordeum sp.*	Wild Barley
Isocoma menziesii	Goldenbush
Keckiella cordifolia	Climbing Bush Penstemon
*Lamarckia aurea**	Goldentop
Lepidium nitidum var. nitidum	Shining Peppergrass
Leymus condensatus	Giant Wild Rye
Linaria canadensis	Blue Toadflax
*Lobularia maritima **	Sweet Alyssum
Lonicera subspicata	Honeysuckle
Lotus scoparius	Deer Weed
Lupinus bicolor	Miniature Lupine
Lupinus sp.	Lupine
Malacothamnus fasciculatus	Bushmallow
Malosma laurina	Laurel Sumac
*Malva parviflora**	Cheese Weed
Marah marcocarpus	Wild Cucumber
*Marrubium vulgare**	Horehound
Mimulus aurantiacus	San Diego Monkey Flower
Mimulus guttatus	Monkey Flower
Mirabilis sp.	Wishbone Bush
Muhlenbergia rigens	Deer Grass
Muhlenbergia sp.	Muhly
Nassella pulchra	Purple Needle-Grass
Navarretia hamata	Hooked Navarretia
*Nicotiana glauca**	Tree Tobacco
*Olea europa **	European Olive
Paeonia californica	California Peony
Pectocarya penicillata	Pectocarya
Penstemon spectabilis	Showy Penstemon
Phacelia cicutaria	Caterpillar Phacelia
Phacelia grandiflora	Big-flower Phacelia
Phacelia minor	Canterbury Bells
Phacelia parryi	Parry Phacelia
Phoenix canariensis	Canary Island Palm
Pityrogramma triangularis var. *triangularis*	Goldenback Fern
Polypodium californicum	California Polypody
Prunus ilicifolia	Holly-Leafed Cherry
Quercus agrifolia	Coast Live Oak
Quercus berberidifolia	Scrub Oak
Rhamnus crocea	Spiny Redberry
Rhamnus ilicifolia	Holly-Leaf Redberry
Rhus integrifolia	Lemonadeberry
Rhus ovata	Sugar Bush
Ribes indecorum	White Flowering Currant
Salix lasiolepis	Arroyo Willow
Salvia apiana	White Sage
Salvia mellifera	Black Sage

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants (cont)	
Sambucus mexicana	Blue Elderberry
Sanicula crassicaulis	Sanicula
Schismus barbatus *	Mediterranean Grass
Scrophularia californica	California Bee Plant
Selaginella sp.	Spike-Moss
Sisyrinchium bellum	Blue-Eyed Grass
Solanum americanum	Nightshade
Stephanomeria exigua	Small Wire-lettuce
Thysanocarpus sp.	Lacepod
Toxicodendron diversilobum	Poison Oak
Xylococcus bicolor	Mission Manzanita
Yucca whipplei	Foothill Yucca
Birds	
Accipiter cooperii	**Cooper's Hawk**
Amphispiza belli belli	**Sage Sparrow**
Aphelocoma coerulescens	Scrub Jay
Archilochus alexandri	Black-Chinned Hummingbird
Baeolophus inornatus	Oak Titmouse
Buteo jamaicensis	Red-Tailed Hawk
Buteo lineatus	**Red-Shouldered Hawk**
Callipepla californicus	California Quail
Calypte anna	Anna's Hummingbird
Carduelis psaltria	Lesser Goldfinch
Carduelis tristis	American Goldfinch
Carpodacus mexicanus	House Finch
Cathartes aura	**Turkey Vulture**
Chamaea fasciata	Wrentit
Colaptes auratus	Northern Flicker
Columba livia *	Rock Dove
Corvus brachyrhynchos	American Crow
Corvus corax	Common Raven
Dendroica coronata	Audubon's Warbler
Dendroica coronata	Yellow-Rumped Warbler
Dendroica petechia	**Yellow Warbler**
Elanus leucurus	**White-Tailed Kite**
Euphagus cyanocephalus	Brewer's blackbird
Falco sparverius	American kestrel
Geococcyx californicus	Greater Roadrunner
Guiraca caerulea	Blue Grosbeak
Icterus bullockii	Bullock's Oriole
Melospiza melodia	Song Sparrow
Mimus polyglottos	Northern Mockingbird
*Passer domesticus**	House Sparrow
Picoides pubescens	Downy Woodpecker
Pipilo crissalis	California Towhee
Pipilo erythrophthalmus	Spotted Towhee
Polioptila caerulea	Blue-Gray Gnatcatcher
Psaltriparus minimus	Bushtit

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Birds (cont)	
Sayornis nigricans	Black Phoebe
Sitta carolinensis	White-Breasted Nuthatch
Stelgidopteryx seripennis	Northern Rough-Winged Swallow
Sturnus vulgaris *	European Starling
Thryomanes bewickii	Bewick's Wren
Toxostoma redivivum	California Thrasher
Trogoldytes aedon	House Wren
Tyrannus verticalis	Western Kingbird
Tyto alba	**Barn Owl**
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-Crowned Sparrow
Mammals	
Canis latrans	Coyote
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse
Dipodomys agilis	Pacific Kangaroo Rat
Lepus californicus bennettii	**San Diego Black-tailed Jackrabbit**
Neotoma lepida	**San Diego Desert Woodrat**
Odocoilus hemionus	**Mule Deer**
Peromyscus maniculatis	Deer Mouse
Procyon lotor	Raccoon
Spermophilus beecheyi	California Ground Squirrel
Sylvilagus audubonii	Desert Cottontail
Amphibians and Reptiles	
Batrachoseps major	Garden Salamander
Bufo boreas	Western Toad
Cnemidophorus tigris multiscutatus	**Coastal Western Whiptail**
Phrynosoma coronatum blainvillei	**San Diego Horned Lizard**
Pseudacris regilla	Pacific Chorus Frog
Sceloporus occidentalis	Western Fence Lizard
Uta stansburiana	Side-Blotched Lizard

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* – non-native taxon
bold – sensitive taxon

Table 3. Habitat Impact/Mitigation Analysis – T&R Mini-Storage Project Site

Biological Resource	Total [2]	Impacted	Impact Neutral	Preserved Onsite [3]	Mitigation Required	Mitigation Provided [4]
CSS	6.9 acres	2.8 acres	1.8 acres	2.3 acres	5.6 acres (2.8 acres @ 2:1)	5.6 acres (2.3 acres onsite)+ (3.3 acres offsite)
SMC	20.9 acres	1.9 acre	6.1 acres	12.9 acres	1.9 acre [5] (1.9 acre @ 1:1)	1.9 acres (onsite)
NNG	3.2 acres	1.4 acre	0.1 acre	1.7 acres	0.7 acre (1.4 acres @ ½:1)	0.7 acre (onsite)
SRS	0.03 acre	none	none	0.03 acre	avoidance	n/a
U/D	0.7 acre	0.1	none	.7 acre [6]	none	n/a
Totals	**31.7 acres**	**6.12 acres**	**8.1 acres**	**17.6 acres**	**-**	**4.9 acres onsite + 3.3 acres offsite**

[2] - Number may not add up because all acreage calculations are rounded per County requirements: nearest 1/10th acre for upland habitats and nearest 1/100th acre for wetland habitats. "Total" numbers include the 6.12-acre Parcel "A" area.

[3] - Excess acreage can be preserved onsite to protect the ecosystem functioning of the onsite wildlife corridor

[4] - Other alternatives are available, including onsite habitat restoration of disturbed areas or complete offsite mitigation via the securement of mitigation credits in a County-approved location.

[5] - County staff has indicted that additional mitigation is required for the Group 1 species impacts. Staff is recommending that the mitigation ratio for SMC be increased from the standard of 0.5:1 to 1:1. She further indicates that this increased mitigation ratio be accomplished within the on-site open space.

[6] - It is recommended that all areas of onsite DH be cleaned up of debris, asphalt, etc and allowed to regrow naturally with native species.

Table 4. Sensitive Species Known from the Vicinity – T&R Mini-Storage Project Site

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Arctostaphylos rainbowensis	Rainbow Manzanita					A		X																	L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A			X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D		X				X													L	1a
Harpagonella palmeri	Palmer's Grappling Hook					D	X		X			X													L	1a
Horkelia truncata	Ramona Horkelia					A		X																	L	1a
Monardella hypoleuca lanata	Felt Leaved Rock Mint					A		X				X													L	1a
Nolina cismontana	Chaparral Beargrass					A		X				X													L	1b
Piperia leptopetala	Narrow-Petaled Rein Orchid					D		X			X	X	X												M	2b
Polygala cornuta fishiae	Fish's Milkwort					D		X				X													L	2b
Satureja chandleri	San Miguel Savory					A		X				X													L	1a
Senecio ganderi	Gander's Butterweed			X		A		X				X													L	1a
Tetracoccus dioicus	Parry's Tetracoccus					A		X				X													L	1b
Accipiter cooperi	Cooper's Hawk						X	X	X	X	X	X	X	X							X				O	--
Accipiter striatus	Sharp-Shinned Hawk						X	X		X	X	X	X	X											M	2a
Agelaius tricolor	Tricolored Blackbird								X	X						X								X	L	1a
Aimophila ruficep canescens	Rufous-Crowned Sparrow						X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow								X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow						X	X				X													O	--
Anniella pulchra pulchra	Silvery Legless Lizard						X		X	X												X			M	2a
Antrozous pallidus	Pallid Bat						X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle				X		X	X	X		X	X	X	X	X										L	1c
Bassariscus astutus	Ringtail							X		X	X	X													L	1a
Buteo lineatus	Red-Shouldered Hawk						X	X	X	X	X	X	X	X											O	--
Cathartes aura	Turkey Vulture						X	X	X	X	X	X	X	X											O	--
Chaetodipus c. femoralis	Dulzura CA Pocket Mouse						X	X	X		X	X	X												M	2a
Chaetodipus fallax fallax	NW San Diego Pocket Mouse						X	X	X			X					X	X							O	--
Charina trivirgata roseofusca	Coastal Rosy Boa						X	X			X	X													M	2a
Circus cyaneus hudsonius	Northern Harrier						X		X							X			X					X	M	2a
Cnemidophorus hyperythrus	Orange-Throated Whiptail						X	X	X	X		X													M	2a
Cnemidophorus t. multiscutatus	Coastal Western Whiptail							X		X	X	X													O	--
Coleonyx variegatus abbotti	SD Banded Gecko						X		X			X													L	1a
Corynorhinus townsendii	Townsend's Bigeared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	N. Red Diamond Rattlesnake						X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				H	3a
Dendroica petechia brewsteri	Yellow Warbler						X	X		X	X	X	X	X											O	--
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											H	3a
Dipodomys stephensi	Stephen's Kangaroo Rat	X	X				X		X																L	1a
Elanus leucurus	White-tailed Kite								X	X															O	--
Eremophila alpestris actis	Horned Lark								X												X				M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Larus californicus	California Gull (Non-Breeding)								X							X			X		X	X	X		L	1a
Lepus californicus bennettii	San Diego Black-tailed Jackrabbit						X	X	X		X	X	X	X											O	--
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X	X	M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X	X		X	X	X	X	X	X									O	--

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
Perognathus longimembris brevinasus	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
Tyto alba	Barn Owl						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	O	--

Probability of Occurrence Codes:
L – Low Probability; rare species in area. Most of these species occur on habitat not found on the project site, including vernal pools, coastal dunes, etc. California Red-legged Frogs and Yellow-billed Cuckoo are two examples of species that fit into this category. Both are extremely rare in California.
M – Moderate Probability. Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the subject property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite
H – High Probability. Most of these species are expected to use the project site, but are difficult to reliably detect. Examples include fossorial reptiles and amphibians, wide-ranging birds, etc.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)
1c – obvious species that would have been seen or otherwise detected if present (animal)
2a - could possibly occur onsite on at least an occasional basis, based on habitat quality (animal)
2b - could occur onsite, but very rare, and/or species poorly known to science (plant)
3a - nearly certain to occur onsite on a regular basis, but cryptic, seasonal, or otherwise difficult to detect (animal)
3b – cryptic or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plant)

Attachment A.
RPO Wetland Survey Report

Attachment B.
California Gnatcatcher Survey Report

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~ UPDATED ~
SUMMARY BIOLOGY REPORT

Biological Resources, Project Impacts, and Mitigation

T&R MINI STORAGE MAJOR USE PERMIT
PDS2005-3300-05-052 & PDS2008-3710-08-0044
ENVIRONMENTAL LOG NO.: PDS2005-3910-0508031
APN 187-170-48 and -49
County of San Diego

Updated June 2019

Summary

The T&R Mini-Storage Major Use Permit project site consists of 31.7 acres of partially-cleared land (APN 187-170-48-00 and APN 187-170-49-00) located at between I-15 and North Centre City Parkway in the Escondido area of unincorporated San Diego County, California. The approved project included a Major Use Permit and a boundary adjustment that removed 6.0 acres (Parcel "A") from the original study site. This 6.0-acre area, plus a frontage area along North Centre City Parkway, is now being examined as part of this project update. Habitats onsite and surrounding the property include chaparral, scrubs, non-native grassland, disturbed/developed, and riparian. The approved project removed approximately 6.12 acres of chaparral, scrub, non-native grassland, and disturbed/developed habitat as a part of site development. These original impacts were mitigated by onsite open space dedication and offsite mitigation credit purchase.

At this time, the current MUP is proposed to be modified to allow the disposal of approximately 65,000 cubic yards of soil and rock materials from the original MUP site (Parcel "B") onto one of two areas; onto a portion of the 6.0-acre Parcel "A" or along the right-of-way of North Centre City Parkway (Figure 3 & 4). Because both areas are constrained by drainage features and/or native vegetation, they are limited in terms of their full use with regards to the disposal of materials. Both alternatives are explored in this report, and both have distinct advantages.

Introduction, Project Description, Location, and Setting

The Updated T&R Mini-Storage project consists of a modification to an existing Major Use Permit (MUP) that allows the development of a commercial storage facility on approximately 6.12 acres of the APN 187-170-48-00 and APN 187-170-49-00 site. An approximately 6.0-acre area (Parcel "A"), which was created as part of the MUP process, is now being proposed as one alternative for dirt and rock disposal from the approved construction area. This 6.0-acre Parcel "A" (hereafter Parcel "A") is currently in a natural state other than areas that were cleared for geotechnical exploration years ago and which are regrowing with natives at this time.

Because the approved storage facility requires the export of 65,000 cubic yards of material from the project footprint, two alternatives are being proposed. The first ("Parcel "A" alternative") is the use of a 2.2-acre portion of Parcel "A". This will require the material to be exported from the construction area, transported over the existing open space on a conveyor belt, and then place onto the southern end of Parcel "A". The second alternative ("ROW alternative") would be to use a 1.1-acre portion of the North Centre City Parkway right-of-way directly in front of the storage facility site for disposal of said materials.

The location of the updated project site is west of North Centre City Parkway and east of Interstate Highway 15 in the Escondido area of unincorporated San Diego County (Figure 1). Various forms of chaparral, scrub, grassland, disturbed/developed, and riparian are the only plant communities (habitats) found onsite, with these same habitats also present offsite (Figure 3).

Biological field surveys of the T&R Mini-Storage MUP project site have been completed by various investigators since at least 2002, including Samuel Reed (SR), W. McTeer (WM), Philippe Vergne (PV), Robin Church (RC), and most recently Vincent Scheidt (VS) and Brandon Myers (BM). Survey data (dates, personnel, hours, study focus, and weather conditions) are presented in Table 1. Older biology reports for this property have been prepared by TeraCor (2003) and Helix Environmental (2009). Data from those older documents have been incorporated, where applicable, into this report.

The purpose of the most current field survey was to update the site's flora and fauna (Table 2), potential impacts associated with the MUP modification (Table 3), and any associated mitigation. A second purpose was to verify the presence of jurisdictional lands and various special status plant and animal species which are known to occur in the general vicinity of this property and specifically in association with the 6.0 acre parcel and the North Centre City Parkway right-of-way (Table 3).

Habitats/Vegetation Communities

The T&R Mini-Storage project site supports a diversity of native and non-native, naturalized vegetation types. The central section of the site, where development is underway, supports various scrubs and other successional plant associations that have developed on old disturbed areas. The balance of the site is more-or-less natural. The habitats associated with the original 31.7-acre MUP site include the following:

Coastal Scrub (Holland Code 32000) – 6.9 acres
Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat-type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage – Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC proper. Soft-woody shrubs are present in the Coastal Sage – Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

The Parcel "A" alternative does not contain any CSS. The ROW alternative contains approximately 0.8 acre of CSS.

Southern Mixed Chaparral (Holland Code 37120) – 20.9 acres
Southern Mixed Chaparral (SMC) vegetation covers the vast majority of the project site. This dense and impenetrable habitat is dominated by large, hard-woody shrubs, such as Chamise *(Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), and San Diego Mountain Mahogany *(Cercocarpus minutifolius)*. SMC is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

The Parcel "A" alternative contains approximately 1.9 acres of SCM. The ROW alternative contains approximately 0.1 acre of SMC.

Non-native Grassland (Holland Code 42200) – 3.2 acres
Non-native Grassland (NNG) vegetation is found in the central area of the project site with a tiny patch on the northern property edge. This habitat is indicated by weedy annual Eurasian grasses, including Ripgut Brome *(Bromus diandrus),* Slender Wild Oat *(Avena barbata),* and many others. Native elements in the habitat include Slender-leaved Milkweed (*Asclepias fasciculatus*), Miniature Lupine *(Lupinus bicolor)*, Common Sand Aster (*Corethrogyne filaginifolia* var. *virgata*), and Fasciculated Tarplant *(Hemizonia fasciculata)*. NNG has the potential to be a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. This is because the County considers NNG to be significant raptor foraging habitat. The biological resource value of this habitat-type is low to moderate.

The Parcel "A" alternative does not contain any NNG. The ROW alternative contains approximately 0.2 acre of NNG.

Southern Riparian Scrub (Holland Code 63300) – 0.03 acre
Southern Riparian Scrub (SRS) is found in a few tiny patches within the site's drainages. This habitat is indicated by Mule Fat *(Baccharis salicifolia)* and Arroyo Willow *(Salix lasiolepis)*. The surrounding vegetation consists of very dense SMC. SRS is a sensitive habitat-type in San Diego County, as defined by Guidelines for Determining Significance. The biological resource value of this habitat-type is moderate to high.

The Parcel "A" alternative does not contain any impacts to SRS. The ROW alternative also does not contain any SRS.

Disturbed/Developed Habitat (Holland Code 11300/12000) – 0.7 acre
The central section of the property supports a paved road and several laterals that qualify as Disturbed/Developed Habitat (DH). These areas support either no vegetation (bare dirt, pavement) or only sparse ruderal weeds such as Perennial Mustard (*Hirschfeldia incana)* and Tocalote *(Centaurea melitensis).* DH is a non-sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The areas mapped as DH have no biological value.

The Parcel "A" alternative contains approximately 0.3 acres of DH. The ROW alternative does not contain any DH.

Flora and Fauna

One hundred and forty-seven species of vascular plants and sixty-five species of animals were detected during the various field surveys of the property. These are listed in Table 2. This list represents a characteristic flora and fauna associated with this part of San Diego County in association with habitats similar to those found onsite.

Special Status Species

Special Status (or "sensitive") Species are those plants and animals listed as "Rare", "Threatened", "Endangered", "of Special Concern", or otherwise noteworthy by the County of San Diego, the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), the California Native Plant Society (CNPS), or other governmental or conservation agencies.

No sensitive plant species were observed during any of the surveys. A variety of sensitive plants are known from the general vicinity of the property, however. Most of these are either associated with habitats not found here (such as native grasslands, mafic chaparral, or vernal pools) or are large and distinctive perennials that would not have been missed if encountered onsite. Sensitive plants known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

The following fourteen sensitive animal species were observed on the T&R Mini-Storage MUP site during the various field surveys, with one additional species (Orange-throated Whiptail) detected during the most recent (2019) survey:

San Diego Coast Horned Lizard *(Phrynosoma coronatum blainvillei)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Northern California though coastal southern California into northern Baja California
Habitat: Open areas of scrub, chaparral and grassland in the presence of native harvester ant *(Pogonomyrmex* sp.*)*, which is the primary prey item for this lizard.
Status on site: A single individual was observed by others in the central portion of the site.

Coastal Western Whiptail *(Cnemidophorus tigris multiscutatus)*
Listing: State status: none
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)
Distribution: Cismontane areas of southern California south into Baja California Norte, Mexico
Habitat: Mainly inhabits coastal sage scrub and chaparral where it occurs in areas of friable soils on hillsides and in canyons but also may be found in open, dry riparian areas..
Status on site: Three individuals were observed by others in central portion of the site.

Orange-throated Whiptail *(Cnemidophorus hyperythrus beldingi)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Extreme southwestern California; from Orange and Riverside Counties south into northern Baja California.
Habitat(s): Inhabits coastal sage scrub, chaparral and areas of open brush with loose soils. May also be found in open, dry riparian areas. Sea level to about 1,800 feet MSL, occasionally higher on hot, south-facing slopes**.**
Status on site: A single individual was observed near the center of Parcel "A".

Cooper's Hawk *(Accipiter cooperii)*
Listing: "Species of Local Concern" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Watch List" (CDFW, 2009)
Distribution: Occurs throughout most of North America, from northern Mexico to southern Canada
Habitat: Inhabits a variety of woodlands, including oak woodlands, riparian and coniferous forests
Status on site: Observed by others in the northern portion of the site.

Bell's Sage Sparrow *(Amphispiza belli belli)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
Distribution: Cismontane areas of southern California and northern Baja California, Mexico. Also found on the west slopes of the Sierra Nevada Mountains
Habitat: Coastal Sage Scrub and chaparral. May also occur in other habitats such as juniper woodland and alluvial fan scrub
Status on site: Observed by others in sage scrub in two locations in the central portion of the site.

Red-shouldered Hawk *(Buteo lineatus)*
Listing: "Blue List" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Occurs over large areas of central and southern California west of the Sierras. Also occurs in Mexico, southeastern Canada, and the eastern United States.
Habitat: Roost and nest in a variety of woodland habitats: eucalyptus woodlands, oak groves, open riparian forests, and related broken wooded areas.
Status on Site: Single specimen was seen flying over the northern portion of the site

Turkey Vulture *(Cathartes aura)*
Listing: "Blue-list" (Tate, 1986)
"Declining" (Unitt, 1984)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Ranges from southern Canada to Argentina
Habitat: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.
Status on site: Several specimens were observed soaring overhead.

Barn Owl *(Tyto alba)*
Listing: "Blue-list" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal/State status: none
Distribution: Nearly worldwide in tropical and temperate regions
Habitat: In southern California, Barn Owls range and forage widely, nesting in many types of open cavities. Specimens roost in areas of thick vegetation or in buildings (hence the common name).
Status on site: Observed by others in the northern portion of the site.

Yellow Warbler *(Dendroica petechia brewsteri)*

Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Nesting typically occurs in willow-dominated riparian areas from Canada to northern Mexico. Specimens overwinter in the area from Mexico south to South America. Yellow Warblers are found throughout San Diego County.
Habitat: Yellow Warblers breed during the summer in moist wooded habitats; however, they can be found most everywhere during migration. In San Diego County they are typically found in riparian thickets.
Status on site: Migratory specimens observed by others flying through the site during migration.

San Diego Black-tailed Jackrabbit *(Lepus californicus bennettii)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Cismontane and transmontane areas of southern California and adjacent areas of northern Baja California, Mexico
Habitat: Associated with areas of open chaparral, scrub, and grassland vegetation
Status on Site: Several observations made by others during the site surveys.

Mule Deer *(Odocoileus hemionus)*
Listing: State status: Regulated Game Animal (CDFW, 2012)
County status: San Diego County Sensitive Animal List (DPLU, 2010), Group 2; "MSCP Indicator" (DPLU, 1993)
Federal status: none
Distribution: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)
Habitat: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats; occasionally by sightings of specimens themselves
Status on site: Scat from this species was observed by others in NNG and CSS.

San Diego Desert Woodrat *(Neotoma lepida intermedia)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Coastal and desert areas of Southern California
Habitat: Open, dry, rocky hillsides in coastal sage scrub and chaparral
Status on site: Observed by others in the northern and central portions of the site.

White-tailed Kite / *Elanus leucurus*
Listing: "Fully Protected Raptor" (CDFW, 1999)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Fully Protected" (CFGC Sections 3511, 4700, 5050 & 5515)
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: White-tailed Kites breed primarily along the coastal lowland, and the species occurs over a broad area of the western U.S. through Mexico and into South America.
Habitat(s): Roost and nest in a variety of woodland habitats. Mainly riparian woodlands, oak groves, related habitats.
Status onsite: Single specimen observed during 2007 focused California Gnatcatcher survey. This species likely forages onsite on occasion due to the openness of the habitat.

Comments: Population numbers in San Diego County appear to have increased since the 1950's, and this species is not currently considered threatened or endangered.

Northwestern San Diego Pocket Mouse *(Chaetodipus fallax fallax)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: "Species of Concern" (USFWS, 2005)
Distribution: Occurs in Southwestern California, with subspecies *fallax* occurring on the coastal side of the mountains.
Habitat: Found in open areas of sage scrub, chaparral, and related open habitats
Status on site: Observed by others in the northern and central portions of the site.

A number of additional sensitive animals are known from general vicinity of property, however. Some of these have a reasonable probability of occurring on or utilizing this site, at least on an occasional basis. These include various native bats *(Choeronycteris, Eumops, Antrozous, Macrotus, Myotis, Nyctinomops)*, and other nocturnal or cryptic species. Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

Directed Field Survey for California Gnatcatcher

California Gnatcatcher *(Polioptila californica)*, a federally-listed Threatened Species, is known from habitat similar to that found on portions of the T&R Mini-Storage project site. Gnatcatchers occur in coastal and interior areas of coastal sage and related scrub habitats typically dominated by California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. Presence/absence field surveys for California Gnatcatcher were conducted by TeraCor biologist Samuel Reed in 2001 and again 2007. An updated gnatcatcher survey of the project development area, plus buffer, was completed by the Mrs. Robin Church of RC Biological Consulting, Inc. in 2012.

No California Gnatcatchers were detected on the T&R Mini-Storage project site during any of the field surveys, including the 2012 survey of a portion of the site. For this reason, the site is considered "unoccupied" by this federally-listed Threatened Species.

Jurisdictional Wetlands and Waterways – Wetland Survey

Wetlands and "waters" are present on portions of the project site in association with various onsite drainages and tributaries. These areas of the site support hydrophytes, hydric soils, and/or wetlands hydrology.

A directed RPO wetland survey was completed as a part of the biology study of the original MUP project site. This resulted in the preparation of a Wetland Survey Report. The modified project will not impact any jurisdictional wetlands or "waters", including RPO wetlands. However, access to Parcel "A" for dirt and rock disposal under the Parcel "A" alternative could result in impacts to RPO wetlands currently in open space. Under the ROW alternative, no wetland impacts are anticipated.

Other Unique Features/Resources

The T&R Mini-Storage project site does not support any regionally-unique land features. The native and naturalized habitats found on this site are not unique to this area, and the property does not support any unusual biological features.

The site provides foraging habitat for various locally common species of raptors and other carnivores. No wildlife nursery sites were detected although faunal reproduction clearly does take place onsite in many areas, including underground, in bird nests, etc. There is potential for large mammals to use the site, and Mule Deer *(Odocoileus hemionus)* scat was reported to have been observed. This is in addition to other, urban-tolerant species such as skunks, coyotes, raccoons, etc. The probability for Mountain Lion *(Felix concolor)* to use the site is considered low.

The project falls entirely within the "I-15 corridor", and area of known passage for species such as California Gnatcatcher and others that move along the fragmented archipelago of CSS and other habitats from Escondido north to Riverside County. The T&R Mini-Storage project was redesigned to retain a functioning wildlife corridor that runs north-south within the property. The approved design provides a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the I-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement.

Significance of Project Impacts and Proposed Mitigation

The T&R Mini-Storage MUP project was subject to review under the California Environmental Quality Act (CEQA) and was required to provide compliance with the County's RPO and Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. This meant that the County required that project-related impacts to biological resources be "less than significant", as defined by CEQA, and that all RPO requirements and the Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources be met. This meant the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". All project-related impacts, as identified during the original CEQA analysis, were fully mitigated prior to the issuance of the MUP. Because the MUP is proposed for modification, additional impacts from the proposed materials disposal are anticipated. These have been incorporated into Table 3.

Direct and Indirect Impacts

Development of the T&R Mini-Storage MUP project site as proposed resulted in a number of project-related direct and indirect impacts. Direct impacts resulted from the actual removal of habitat, plants, and animals from the site through brushing clearing and grading. These direct impacts are considered permanent because they result in a conversion of habitats to buildings, landscaped areas, roads, etc. Indirect impacts also affect plants, animals, and habitats that occur on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". The indirect impacts associated with site conversion are less quantifiable, due to the uncertainty associated with edge effects.

The following project-related impacts were identified with construction of the T&R Mini-Storage project. All of these impacts were mitigated as a part of the original MUP approvals and related permitting, reducing impacts to **less than significant**:

- 2.8 acres of CSS was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.9 acre of SMC was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.4 acre of NNG was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.1 acre of DH was impacted by development. The County of San Diego did not required mitigation for this loss pursuant to the "Guidelines for Determining Significance". The project impacted habitat for at least fourteen Special States Species, including five Group 1 bird species and nine Group 2 species. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- The project as approved impacted a functioning wildlife corridor that runs north-south within the "I-15 corridor". Impacts to this corridor were considered **less than significant** because adequate corridor width (315' onsite plus 100' offsite) was maintained and open space was placed over the corridor area to preserve the biological resources within it in perpetuity.

Modification of the MUP will result in additional project impacts, as follows:

<u>The Parcel "A" alternative for dirt and rock disposal will impact the following habitats:</u>

- 1.9 acre of SMC would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.3 acre of DH would be impacted by development. The County of San Diego will not require mitigation for this loss pursuant to the "Guidelines for Determining Significance".

<u>The ROW alternative for dirt and rock disposal will impact the following habitats:</u>

- 0.1 acre of SMC would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.8 acre of CSS would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.2 acre of NNG would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".

Cumulative Impacts

Cumulative impacts refer to a project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects (Public Resources Code § 21083; California Code of Regulations, Title 14, § 15064[h], 15065[c], 15130, and 15355). Cumulative impacts can occur when individually minor but collectively significant projects take place over time.

A list of past, present and future projects that could cumulatively contribute to the projects significant impacts was compiled based on the defined study area. The study area was determined based on several factors including land use, habitats, draft North County MSCP boundaries and species ranges. The general

boundaries of this study area extend from the draft North County MSCP PAMA boundaries to the north adjacent to Tierra Libertia Road, the Escondido city limits to the south and west and the draft North County MSCP PAMA boundaries to the east, approximately half the distance to North Broadway. The list of cumulative projects within this study area is as follows:

AD 07-057	HARTMAN, AD, LOT CLEARING
MUP 99-007	DRAGOO WINERY
MUP 04-050	RANCHO VERONA, MUP, GROUP RESIDENTIAL
MUP 10-003	CORTEL MUP CELL SITE TMO SD6110, P10-003
MUP 10-027	DOUGHERTY PET RESORT/MUP 10-027
MUP 84-112-01	THUNDERBIRD GOLF DRIVING RANGE
MUP 84-112-02	PRACTICE PERFECT GOLF RANGE
ZAP 02-032	JESMOND DENE / SPRINT
ZAP 00-145	SPRINT SDG&E / SPRINT
ZAP 00-059	WILLIAMS COMMUNICATIONS
STP 01-034	MESA ROCK RESIDENCE SITE PLAN
STP 01-045	LANTIS SITE PLAN
STP 03-019	CRV ESCONDIDO 68 SITE PLAN
STP 03-020	MONTREUX MODEL HOME
STP 99-038	HERALD LANTIS
STP 04-025	SITE PLAN FOR SFD IN I-15 CORRIDOR
STP 05-030	MONTREUX
STP 07-041	HARTMAN/STP/EASY TURF STORAGE BLDG
STP 08-015	ADJ HOLDINGS, SITE PLAN I-15 REVIEW, S 0
TM 5114	MONTREUX TM
TPM 19895	STEPHENS 4 LOT SPLIT - TPM
TPM 20420	LANTIS TPM
TPM 20879	KNOX TENTATIVE PARCEL MAP
TPM 21192	RUA MICHELLE, TPM 21192

Cumulative projects within the geographic scope of analysis would have the potential to result in impacts to Special Status Species, including various plants and animals, including loss of habitat. Of the 24 cumulative projects analyzed, 17 were either withdrawn or determined not to result in impacts to biological resources. The remaining 7 cumulative projects have the potential to impact habitat and sensitive species through clearing, grading, grubbing, trenching, and other construction activities.

Modification of the MUP project would result in additional impacts, including impacts to SMC and potentially CSS and NNG. These vegetation types are relatively well distributed in San Diego County, although all are sensitive and depleted in many areas. Therefore, from a regional perspective, the relatively minor impacts to the above vegetation types, although adverse and significant, are not cumulatively considerable when viewed in connection with the substantial acreages these habitat types remaining in the San Diego County region.

Impacts to the above habitats will be mitigated for in kind, reducing impacts to a level below significance. Fourteen sensitive species were observed on the project site. Impacts to these species, although adverse and

potentially significant, are not cumulatively considerable when viewed in connection with the substantial numbers of these species remaining in the San Diego County region.

Furthermore, the project falls entirely within the "I-15 corridor", an area of known passage for species such as California gnatcatcher and others that move along the fragmented archipelago of coastal sage scrub and other habitats from Escondido north to Riverside County. The project was designed to retain a functioning wildlife corridor that runs north-south within the property. The project provided a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the 1-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement. With the recordation of onsite open space over the existing wildlife corridor, the project resulted in a less than significant impact to wildlife movement and would not result in a cumulatively considerable impact to wildlife movement in the study area.

In summary, with the mitigation requirements for biological resources on this site, the project would not result in cumulatively considerable impacts on sensitive habitats, sensitive species or existing wildlife movement.

Proposed Mitigation

Because both alternatives (Parcel "A" alternative and ROW alternative) will result in impacts to sensitive habitats, and in order to satisfy the requirements of the County's "Guidelines for Determining Significance", and current County policy for mitigating impacts to habitats, Special Status Species, and Wildlife Corridor function, the following mitigation measures are recommended:

The Parcel "A" mitigation alternative for dirt and rock disposal:

1. The project shall provide mitigation at a 1:1 ratio for impacts to up to 1.9 acre of SMC. This is equivalent to 1.9 acre of required SMC mitigation. This may be satisfied either onsite via the dedication of a Biological Open Space Easement over 1.9 acres of this habitat (Figure 4) or offsite via the securement of no less than 1.9 acre-credit of SMC in a County-approved location.
2. Access to the disposal area will require the use of a temporary conveyor belt system to span the open space easement and RPO wetlands within. This system must be removed entirely following the disposal of the required 65,000 cubic years of material.

The ROW mitigation alternative for dirt and rock disposal:

1. The project shall provide mitigation at a 1:1 ratio for impacts to up to 0.1 acre of SMC. This is equivalent to 0.1 acre of required mitigation. This should be satisfied offsite via the securement of no less than 0.1 acre-credits of SMC in a County-approved location.
2. The project shall provide mitigation at a 2:1 ratio for impacts to up to 0.8 acres of CSS. This is equivalent to 1.6 acres of required mitigation. This should be satisfied offsite via the securement of no less than 1.6 acre-credits of CSS in a County-approved location.
3. The project shall provide mitigation at a 0.5:1 ratio for impacts to up to 0.2 acres of NNG. This is equivalent to 0.1 acre of required mitigation. It is recommended that this 0.1-acre mitigation obligation for NNG impacts be satisfied offsite via the securement of no less than 1.0 acre-credit of NNG in a County-approved location.

4. Because the ROW alternative will impact CSS, it may be necessary to process a Habitat Loss Permit (HLP) concurrent with modification of the MUP.

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Preparer and Persons/Organizations Contacted

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Certified Biological Consultant

Attachments

Figure 1. Regional Location
Figure 2. Recent Aerial Photograph
Figure 3. Biological Resources
Figure 4. Onsite OSE Alternative

Table 1. Field Surveys
Table 2 Flora and Fauna Detected
Table 3. Impact/Mitigation Analysis
Table 4. Sensitive Species Known from the Vicinity

Figure 1. Regional Location – T&R Mini-Storage Project Site
Portion of the U.S.G.S "Valley Center, California" 7.5′ Quadrangle

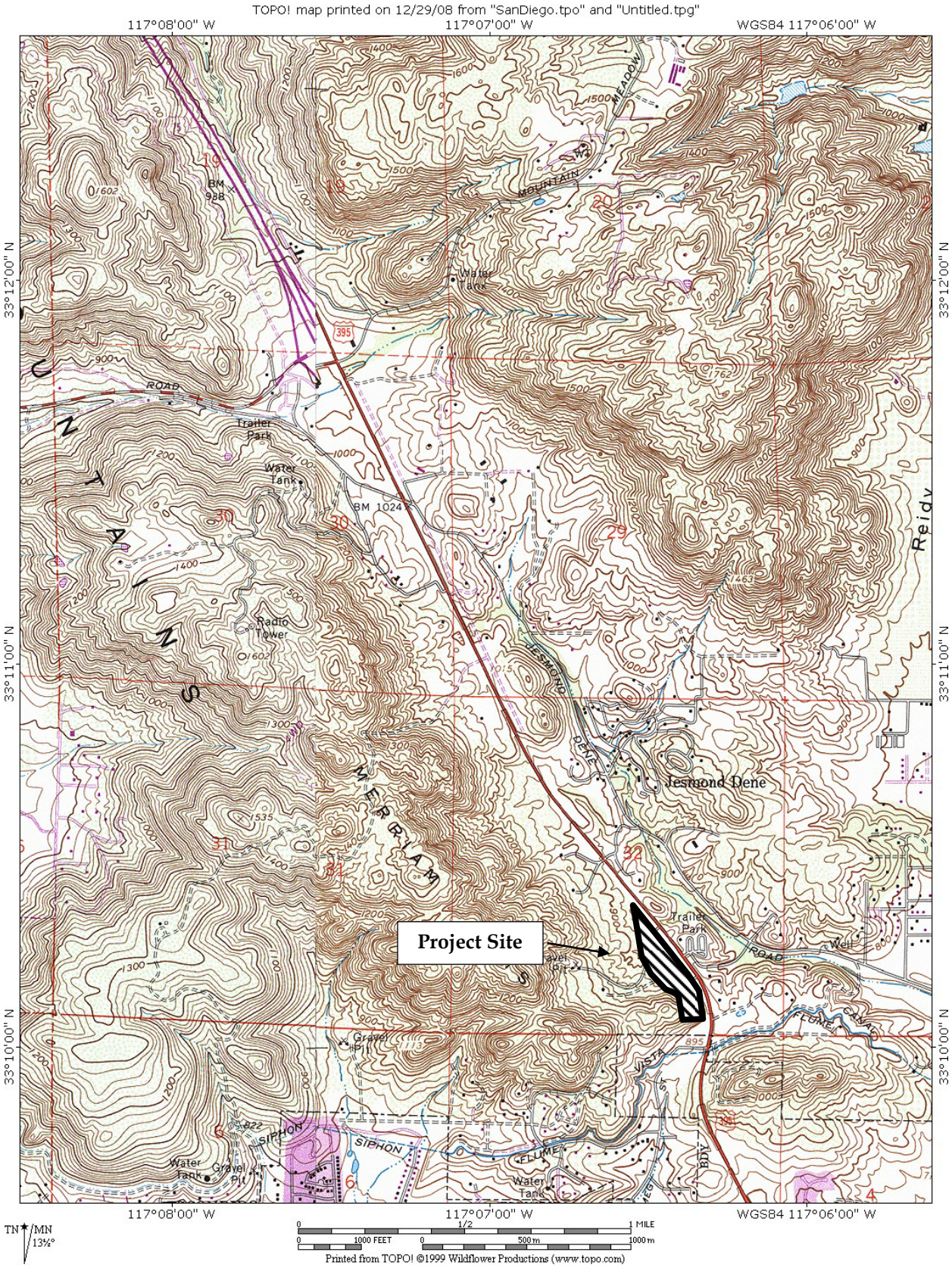

Figure 2. Recent Aerial Photograph – T&R Mini-Storage Project Site

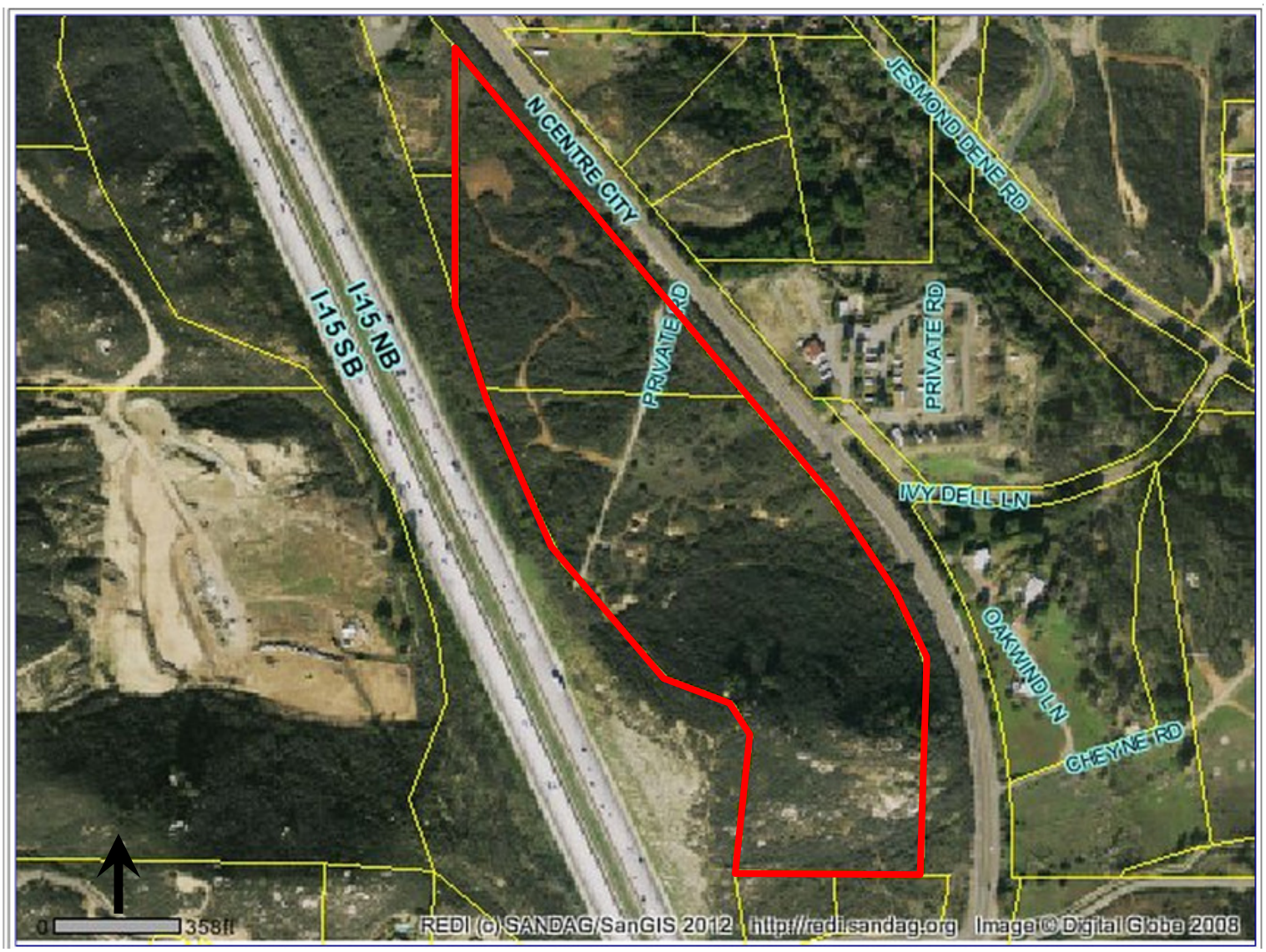

Figure 3. Biological Resources – T&R Mini-Storage Project Site

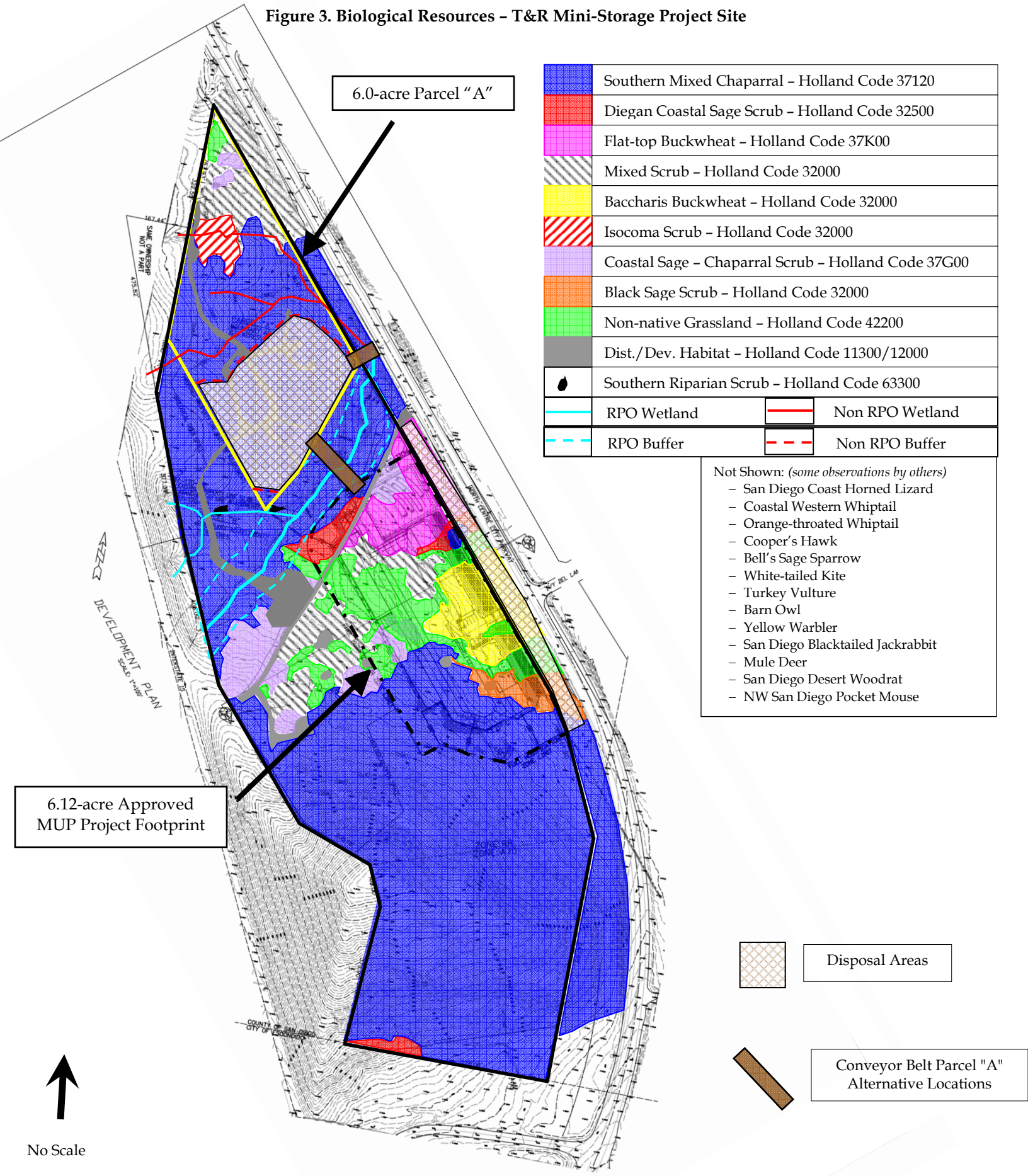

Figure 4. Proposed OSE - Parcel "A" Alternative – T&R Mini-Storage MUP Modification Project Site

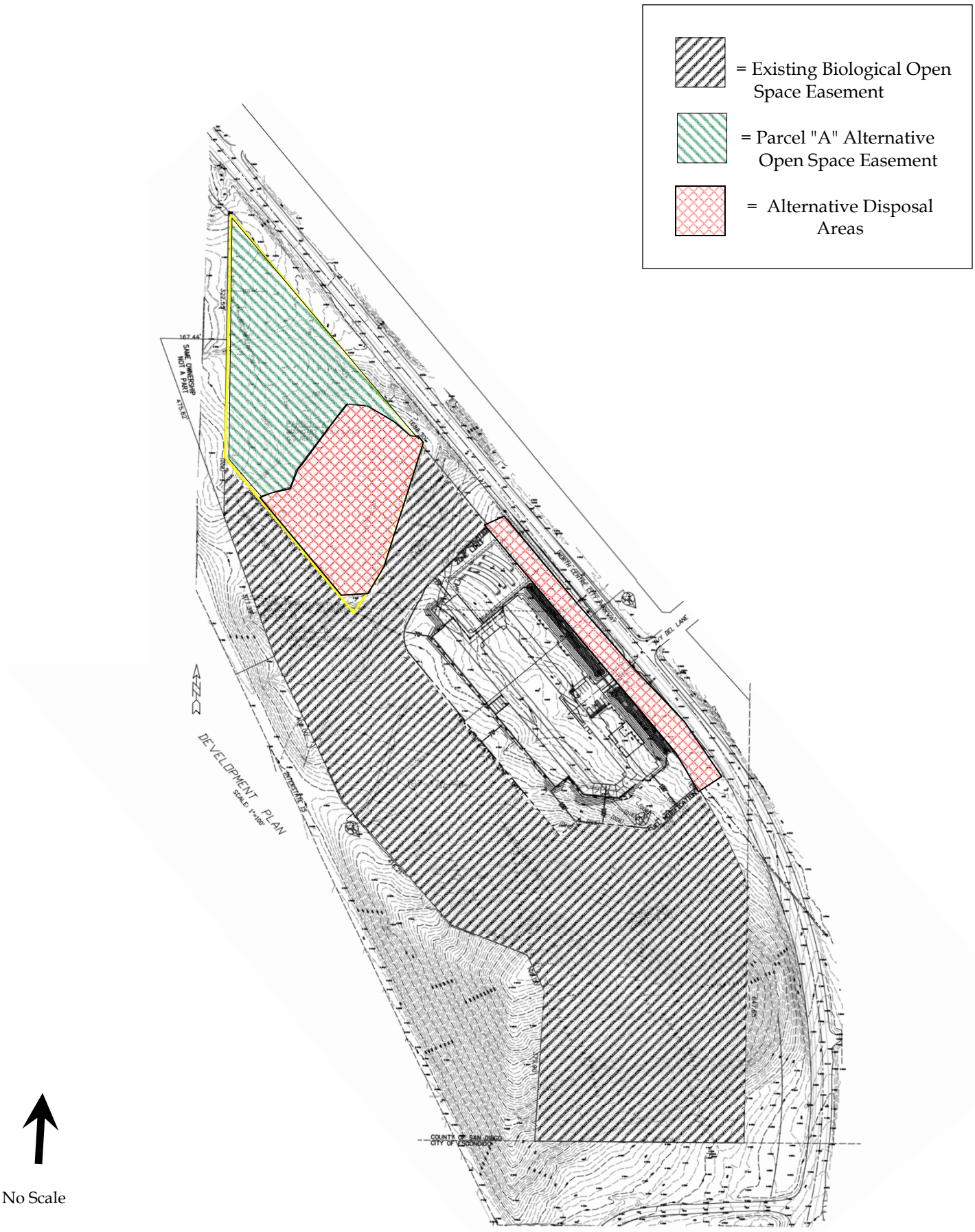

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
05 Mar 2001	SR	n/a[1]	Quino	n/a
16 Mar 2001	SR	n/a	Quino	n/a
24 Mar 2001	SR	n/a	Gnatcatcher	n/a
25 Mar 2001	SR	n/a	Quino	n/a
31 Mar 2001	SR	n/a	Gnatcatcher	n/a
03 Apr 2001	SR	n/a	Quino	n/a
13 Apr 2001	SR	n/a	Gnatcatcher + Quino	n/a
06 Dec 2002	SR	n/a	General	n/a
15 Jan 2003	SR, WM	n/a	General + Mapping	n/a
20 Jan 2003	SR, WM	n/a	General + Mapping	n/a
23 Jan 2003	SR, WM	n/a	General + Mapping	n/a
26 Jan 2003	SR, WM	n/a	General + Mapping	n/a
10 Mar 2003	SR ?	n/a	Wetlands	n/a
01 Apr 2003	SR ?	n/a	Wetlands	n/a
08 May 2003	SR	n/a	Floral	n/a

[1] *n/a – data not available*

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
30 Mar 2007	SR ?	n/a	Gnatcatcher	n/a
07 Apr 2007	SR	n/a	Gnatcatcher	n/a
15 Apr 2007	SR ?	n/a	Gnatcatcher	n/a
18 Apr 2007	PV	n/a	Kangaroo Rat	n/a
19 Apr 2007	PV	n/a	Kangaroo Rat	n/a
20 Apr 2007	PV	n/a	Kangaroo Rat	n/a
22 Apr 2007	PV	n/a	Kangaroo Rat	n/a
23 Apr 2007	PV	n/a	Kangaroo Rat	n/a
24 Apr 2007	PV	n/a	Kangaroo Rat	n/a
02 May 2007	SR ?	n/a	Gnatcatcher	n/a
15 May 2007	SR ?	n/a	Gnatcatcher	n/a
22 May 2007	SR ?	n/a	Gnatcatcher	n/a
27 Sep 2011	VS	10:00-12:45	General	Clear skies, temps in the high 70°s to low 90°s, no wind
12 Oct 2011	VS	08:45-12:30	General + Mapping	Clear skies, temps in the low 80°s to high 90°s, no wind
06 Jan 2012	VS	08:45-12:30	General + Wetlands	Clear skies, temps in the low 60°s, no wind
XX June 2019	VS, BM	09:00-02:30	MUP Update	Clear skies, temps in the mid 70°s, no wind

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants	
Acmispon glaber	Deerweed
Acourtia microcephala	Sacapellote
Adenostoma fasciculatum	Chamise
Ailanthus altissima *	Tree Of Heaven
Amsinckia sp.	Fiddleneck
Antirrhinum nuttallianum	Nuttall's Snapdragon
Artemisia californica	California Sagebrush
Artemisia douglasiana	Mugwort
Asclepias fascicularis	Narrowleaf Milkweed
*Avena barbata**	Slender Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis salicifolia	Mule Fat
Baccharis sarothroides	Broom Baccharis
Brassica nigra *	Black Mustard
Brickellia californica	Bricklebush
Bromus diandrus *	Ripgut Brome
Bromus hordeaceus *	Common Soft-Brome
Bromus rubens *	Red Brome
Calystegia macrostegia	Morning-Glory
Camissonia hirtella	Evening Primrose
Camissoniopsis bistorta	California Sun Cup
Capsella bursa-pastoris	Shepherd's Purse
Carduus pycnocephalus *	Italian Thistle
Carex triquetra	Trigonous Sedge
Castilleja densiflora	Parish's Owl's-Clover
Ceanothus tomentosus	Woollyleaf Ceanothus
Centaurea melitensis *	Tocalote
Cercocarpus minutifolius	San Diego Mountain-Mahogany
Chaenactis glabriuscula	Glabriuscula
Cirsium occidentale	Cobwebby Thistle
Claytonia parviflora	Narrow-Leaved Miner's Lettuce
Clematis pauciflora	Rope-Vine
Conium maculatum *	Poison Hemlock
Cordylanthus rigidus	Stiffbranch Bird's Beak
Corethrogyne filaginifolia var. virgata	Common Sand Aster
Crassula connata	Pygmy-Weed
Cryptantha intermedia	Common Cryptantha
Cuscuta californica	California Dodder
Cyperus sp.	Sedge
Daucus pusillus	American Wild Carrot
Deinandra fasciculata	Clustered Tarweed
Dicentra chrysantha	Golden Eardrops
Dichelostemma pulchellum	Blue Dicks
Diplacus x australis	San Diego Monkeyflower
Dudleya pulverulenta	Chalk Live-Forever
Encelia farinosa *	Brittle Bush
Eriastrum filifolium	Lavender Woollystar
Eriogonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
*Erodium cicutarium**	Filaree

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Erythranthe guttata	Seep Monkeyflower
Eucrypta chrysanthemifolia	Common Eucrypta
*Euphorbia peplus**	Petty Spurge
Foeniculum vulgare	Fennel
Galium sp.	Bedstraw
Hazardia squarrosa	Saw-Toothed Goldenbush
Helianthemum scoparium	Peak Rush-Rose
Helianthus gracilentus	Sunflower
Heteromeles arbutifloia	Toyon
*Hirschfeldia incana**	Perennial Mustard
*Hordeum sp.**	Wild Barley
*Hypochaeris glabra **	Smooth Cat's Ear
Isocoma menziesii	Goldenbush
Keckiella antirrhinoides	Chaparral Beardtongue
Keckiella cordifolia	Climbing Bush Penstemon
*Lamarckia aurea**	Goldentop
Lepidium nitidum var. nitidum	Shining Peppergrass
Leymus condensatus	Giant Wild Rye
Linaria canadensis	Blue Toadflax
*Lobularia maritima **	Sweet Alyssum
*Logfia filaginoides**	California Cottonrose
*Logfia gallica **	Narrowleaf Cottonrose
Lonicera subspicata	Southern Honeysuckle
Lotus scoparius	Deer Weed
Lupinus bicolor	Miniature Lupine
Lupinus sp.	Lupine
Lysimachia arvensis	Scarlet Pimpernel
Malacothamnus fasciculatus	Bushmallow
Malosma laurina	Laurel Sumac
*Malva parviflora**	Cheese Weed
Marah marcocarpus	Wild Cucumber
*Marrubium vulgare**	Horehound
Mimulus guttatus	Monkey Flower
Mirabilis sp.	Wishbone Bush
Muhlenbergia rigens	Deer Grass
Muhlenbergia sp.	Muhly
Nassella lepida	Foothill Needle Grass
Nassella pulchra	Purple Needle-Grass
Navarretia hamata	Hooked Navarretia
Nicotiana glauca	Tree Tobacco
*Olea europa **	European Olive
Oxalis micrantha	Dwarf Woodsorrel
Paeonia californica	California Peony
Pectocarya penicillata	Pectocarya
Penstemon spectabilis	Showy Penstemon
Pentagramma triangularis	Goldback Fern
Phacelia cicutaria	Caterpillar Phacelia
Phacelia grandiflora	Big-Flower Phacelia
Phacelia minor	Canterbury Bells
Phacelia parryi	Parry Phacelia
Phacelia ramosissima	Scorpionweeds
Phacelia sp.	Phacelia

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Phoenix canariensis *	Canary Island Palm
Pityrogramma triangularis var. *triangularis*	Goldenback Fern
Polycarpon tetraphyllum	Fourleaf Manyseed
Polypodium californicum	California Polypody
Prunus ilicifolia	Holly-Leafed Cherry
Pseudognaphalium beneolens	Fragrant Everlasting
Pseudognaphalium bolettii	Bicolored Cudweed
Pseudognaphalium californicum	California Cudweed
Pseudognaphalium stramineum *	Cudweed
Pterostegia drymarioides	Fairy Mist
Quercus x acutidens	Torrey's Hybrid Oak
Quercus agrifolia	Coast Live Oak
Quercus berberidifolia	Scrub Oak
Rhamnus crocea	Spiny Redberry
Rhamnus ilicifolia	Holly-Leaf Redberry
Rhus aromatica	Fragrant Sumac
Rhus integrifolia	Lemonadeberry
Rhus ovata	Sugar Bush
Ribes indecorum	White Flowering Currant
Salix lasiolepis	Arroyo Willow
Salvia apiana	White Sage
Salvia mellifera	Black Sage
Sambucus cerulea	Blue Elder
Sanicula crassicaulis	Sanicula
Schismus barbatus *	Mediterranean Grass
Scrophularia californica	California Bee Plant
Selaginella sp.	Spike-Moss
Sisyrinchium bellum	Blue-Eyed Grass
Solanum americanum *	Nightshade
Solanum parishii	Parish's Nightshade
Sonchus asper *	Prickly Sowthistle
Stephanomeria exigua	Small Wire-Lettuce
Stylocline gnaphaloides	Everlasting Neststraw
Thysanocarpus sp.	Lacepod
Toxicodendron diversilobum	Poison Oak
Triodanis biflora	Venus' Looking-Glass
Vulpia myuros *	Rat's-Tail Fescue
Xylococcus bicolor	Mission Manzanita
Yucca whipplei	Foothill Yucca
Zeltnera venusta	California Centaury

Birds

Accipiter cooperii	**Cooper's Hawk**
Amphispiza belli belli	**Sage Sparrow**
Aphelocoma coerulescens	Scrub Jay
Archilochus alexandri	Black-Chinned Hummingbird
Baeolophus inornatus	Oak Titmouse
Buteo jamaicensis	Red-Tailed Hawk
Buteo lineatus	**Red-Shouldered Hawk**
Callipepla californicus	California Quail
Calypte anna	Anna's Hummingbird

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Carduelis psaltria	Lesser Goldfinch
Carduelis tristis	American Goldfinch
Carpodacus mexicanus	House Finch
Cathartes aura	**Turkey Vulture**
Chamaea fasciata	Wrentit
Colaptes auratus	Northern Flicker
Columba livia *	Rock Dove
Corvus brachyrhynchos	American Crow
Corvus corax	Common Raven
Dendroica coronata	Audubon's Warbler
Dendroica coronata	Yellow-Rumped Warbler
Dendroica petechia	**Yellow Warbler**
Elanus leucurus	**White-Tailed Kite**
Euphagus cyanocephalus	Brewer's blackbird
Falco sparverius	American kestrel
Geococcyx californicus	Greater Roadrunner
Guiraca caerulea	Blue Grosbeak
Icterus bullockii	Bullock's Oriole
Melospiza melodia	Song Sparrow
Mimus polyglottos	Northern Mockingbird
*Passer domesticus**	House Sparrow
Picoides pubescens	Downy Woodpecker
Pipilo crissalis	California Towhee
Pipilo erythrophthalmus	Spotted Towhee
Polioptila caerulea	Blue-Gray Gnatcatcher
Psaltriparus minimus	Bushtit
Sayornis nigricans	Black Phoebe
Sitta carolinensis	White-Breasted Nuthatch
Stelgidopteryx seripennis	Northern Rough-Winged Swallow
*Sturnus vulgaris *	European Starling
Thryomanes bewickii	Bewick's Wren
Toxostoma redivivum	California Thrasher
Trogoldytes aedon	House Wren
Tyrannus verticalis	Western Kingbird
Tyto alba	**Barn Owl**
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-Crowned Sparrow

Mammals

Canis latrans	Coyote
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse
Dipodomys agilis	Pacific Kangaroo Rat
Lepus californicus bennettii	**San Diego Black-tailed Jackrabbit**
Neotoma lepida	**San Diego Desert Woodrat**
Odocoilus hemionus	**Mule Deer**
Peromyscus maniculatis	Deer Mouse
Procyon lotor	Raccoon
Spermophilus beecheyi	California Ground Squirrel
Sylvilagus audubonii	Desert Cottontail

Amphibians and Reptiles

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Batrachoseps major	Garden Salamander
Bufo boreas	Western Toad
Cnemidophorus tigris multiscutatus	**Coastal Western Whiptail**
Cnemidophorus hyperythrus beldingi	**Orange-throated Whiptail**
Lampropeltis californiae	California King Snake
Phrynosoma coronatum blainvillei	**San Diego Horned Lizard**
Pseudacris regilla	Pacific Chorus Frog
Sceloporus occidentalis	Western Fence Lizard
Uta stansburiana	Side-Blotched Lizard

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* – non-native taxon
bold – sensitive taxon

Table 3. Habitat Impact/Mitigation Analysis – T&R Mini-Storage MUP Modification Project Site

Parcel "A" Alternative					
Biological Resource	Total [2]	Impacted	Impact Neutral	Mitigation Required	Mitigation Provided [3]
SMC	1.9 acres	1.9 acres	none	1.9 acres @ 1:1	1.9 acres onsite or offsite
DH	0.9 acres	0.3 acre	none	None	--

ROW Alternative					
Biological Resource	Total	Impacted	Impact Neutral	Mitigation Required	Mitigation Provided
SMC	0.1 acre	0.1 acre	none	0.1 acres @ 1:1	0.1 acre offsite
CSS	0.8 acre	0.8 acre	none	1.9 acres @ 2:1	0.8 acre offsite
NNG	0.2 acre	0.2 acre	none	0.1 acre @ 0.5:1	0.1 acre offsite

[2] - *Number may not add up because all acreage calculations are rounded per County requirements: nearest 1/10th acre for upland habitats and nearest 1/100th acre for wetland habitats.*

[3] - *Other alternatives are available, including onsite habitat restoration of disturbed areas or partial onsite/ offsite mitigation.*

Table 4. Sensitive Species Known from the Vicinity – T&R Mini-Storage Project Site

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Arctostaphylos rainbowensis	Rainbow Manzanita					A		X																	L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A			X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D		X				X													L	1a
Harpagonella palmeri	Palmer's Grappling Hook					D	X		X			X													L	1a
Horkelia truncata	Ramona Horkelia					A		X																	L	1a
Monardella hypoleuca lanata	Felt Leaved Rock Mint					A		X				X													L	1a
Nolina cismontana	Chaparral Beargrass					A		X				X													L	1b
Piperia leptopetala	Narrow-Petaled Rein Orchid					D		X			X	X	X												M	2b
Polygala cornuta fishiae	Fish's Milkwort					D		X				X													L	2b
Satureja chandleri	San Miguel Savory					A		X				X													L	1a
Senecio ganderi	Gander's Butterweed			X		A		X				X													L	1a
Tetracoccus dioicus	Parry's Tetracoccus					A		X				X													L	1b
Accipiter cooperi	Cooper's Hawk						X	X	X	X	X	X	X	X							X				O	--
Accipiter striatus	Sharp-Shinned Hawk						X	X		X	X	X	X	X											M	2a
Agelaius tricolor	Tricolored Blackbird								X	X						X								X	L	1a
Aimophila ruficep canescens	Rufous-Crowned Sparrow						X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow								X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow						X	X				X													O	--
Anniella pulchra pulchra	Silvery Legless Lizard						X		X	X												X			M	2a
Antrozous pallidus	Pallid Bat						X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle				X		X	X	X		X	X	X	X	X										L	1c
Bassariscus astutus	Ringtail							X		X	X	X													L	1a
Buteo lineatus	Red-Shouldered Hawk						X	X	X	X	X	X	X	X											O	--
Cathartes aura	Turkey Vulture						X	X	X	X	X	X	X	X											O	--
Chaetodipus c. femoralis	Dulzura CA Pocket Mouse						X	X	X		X	X	X												M	2a
Chaetodipus fallax fallax	NW San Diego Pocket Mouse						X	X	X			X					X	X							O	--
Charina trivirgata roseofusca	Coastal Rosy Boa						X	X			X	X													M	2a
Circus cyaneus hudsonius	Northern Harrier						X		X							X			X					X	M	2a
Cnemidophorus hyperythrus	Orange-Throated Whiptail						X	X	X	X		X													O	--
Cnemidophorus t. multiscutatus	Coastal Western Whiptail							X		X	X	X													O	--
Coleonyx variegatus abbotti	SD Banded Gecko						X		X			X													L	1a
Corynorhinus townsendii	Townsend's Bigeared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	N. Red Diamond Rattlesnake						X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				H	3a
Dendroica petechia brewsteri	Yellow Warbler						X	X		X	X	X	X	X											O	--
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											H	3a
Dipodomys stephensi	Stephen's Kangaroo Rat	X	X				X		X																L	1a
Elanus leucurus	White-tailed Kite								X	X															O	--
Eremophila alpestris actis	Horned Lark								X												X				M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Larus californicus	California Gull (Non-Breeding)								X							X			X		X	X	X		L	1a
Lepus californicus bennettii	San Diego Black-tailed Jackrabbit						X	X	X		X	X	X	X											O	--
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X	X	M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X	X		X	X	X	X	X	X									O	--

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
Perognathus longimembris brevinasus	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
Tyto alba	Barn Owl						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	O	--

Probability of Occurrence Codes:
L – Low Probability; rare species in area. Most of these species occur on habitat not found on the project site, including vernal pools, coastal dunes, etc. California Red-legged Frogs and Yellow-billed Cuckoo are two examples of species that fit into this category. Both are extremely rare in California.
M – Moderate Probability. Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the subject property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite
H – High Probability. Most of these species are expected to use the project site, but are difficult to reliably detect. Examples include fossorial reptiles and amphibians, wide-ranging birds, etc.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)
1c – obvious species that would have been seen or otherwise detected if present (animal)
2a - could possibly occur onsite on at least an occasional basis, based on habitat quality (animal)
2b - could occur onsite, but very rare, and/or species poorly known to science (plant)
3a - nearly certain to occur onsite on a regular basis, but cryptic, seasonal, or otherwise difficult to detect (animal)
3b – cryptic or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plant)

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~ UPDATED ~
SUMMARY BIOLOGY REPORT
Biological Resources, Project Impacts, and Mitigation

T&R MINI STORAGE MAJOR USE PERMIT
PDS2005-3300-05-052 & PDS2008-3710-08-0044
ENVIRONMENTAL LOG NO.: PDS2005-3910-0508031
APN 187-170-48 and -49
County of San Diego

Updated July 2019

Summary

The T&R Mini-Storage Major Use Permit project site consists of 31.7 acres of partially-cleared land (APN 187-170-48-00 and APN 187-170-49-00) located at between I-15 and North Centre City Parkway in the Escondido area of unincorporated San Diego County, California. The approved project included a Major Use Permit and a boundary adjustment that removed 6.0 acres (Parcel "A") from the original study site. This 6.0-acre area, plus a frontage area along North Centre City Parkway, is now being examined as part of this project update. Habitats onsite and surrounding the property include chaparral, scrubs, non-native grassland, disturbed/developed, and riparian. The approved project removed approximately 6.12 acres of chaparral, scrub, non-native grassland, and disturbed/developed habitat as a part of site development. These original impacts were mitigated by onsite open space dedication and offsite mitigation credit purchase.

At this time, the current MUP is proposed to be modified to allow the disposal of approximately 65,000 cubic yards of soil and rock materials from the original MUP site (Parcel "B") onto one of two areas; onto the 6.0-acre Parcel "A" and/or along the right-of-way of North Centre City Parkway (Figure 3 & 4). Because both areas support remnant and erosional drainage features and native vegetation. Both alternatives are explored in this report, and both have distinct advantages.

Introduction, Project Description, Location, and Setting

The Updated T&R Mini-Storage project consists of a modification to an existing Major Use Permit (MUP) that allows the development of a commercial storage facility on approximately 6.12 acres of the APN 187-170-48-00 and APN 187-170-49-00 site. An approximately 6.0-acre area (Parcel "A"), which was created as part of the MUP process, is now being proposed as one alternative for dirt and rock disposal from the approved construction area. This 6.0-acre Parcel "A" (hereafter Parcel "A") is currently in a natural state other than areas that were cleared for geotechnical exploration years ago and which are regrowing with natives at this time. Because the approved storage facility requires the export of 65,000 cubic yards of material from the project

footprint, two alternatives are being proposed. The first ("Parcel "A" alternative") is the use of the entire 6.0 acre parcel (Parcel "A") and an adjacent approximately 1.1 acre portion of the North Centre City Parkway right-of-way . This will require the material to be exported from the construction area and then transported to Parcel "A" for proper disposal. The remnant drainage within the right-of-way would be filled to allow access from North Centre City Parkway and Parcel "A" would be almost entirely covered with material from the MUP site. The second alternative ("ROW alternative") would be to use a different 1.1-acre portion of the North Centre City Parkway right-of-way directly in front of the storage facility site for disposal of said materials.

The location of the updated project site is west of North Centre City Parkway and east of Interstate Highway 15 in the Escondido area of unincorporated San Diego County (Figure 1). Various forms of chaparral, scrub, grassland, disturbed/developed, and riparian are the only plant communities (habitats) found onsite, with these same habitats also present offsite (Figure 3).

Biological field surveys of the T&R Mini-Storage MUP project site have been completed by various investigators since at least 2002, including Samuel Reed (SR), W. McTeer (WM), Philippe Vergne (PV), Robin Church (RC), and most recently Vincent Scheidt (VS) and Brandon Myers (BM). Survey data (dates, personnel, hours, study focus, and weather conditions) are presented in Table 1. Older biology reports for this property have been prepared by TeraCor (2003) and Helix Environmental (2009). Data from those older documents have been incorporated, where applicable, into this report.

The purpose of the most current field survey was to update the site's flora and fauna (Table 2), potential impacts associated with the MUP modification (Table 3), and any associated mitigation. A second purpose was to verify the presence of jurisdictional lands and various special status plant and animal species which are known to occur in the general vicinity of this property and specifically in association with the 6.0 acre parcel and the North Centre City Parkway right-of-way (Table 3).

Habitats/Vegetation Communities

The T&R Mini-Storage project site supports a diversity of native and non-native, naturalized vegetation types. The central section of the site, where development is underway, supports various scrubs and other successional plant associations that have developed on old disturbed areas. The balance of the site is more-or-less natural. The habitats associated with the original 31.7-acre MUP site include the following:

Coastal Scrub (Holland Code 32000) – 6.9 acres
Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat-type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage – Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC proper. Soft-woody shrubs are present in the Coastal Sage – Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

The Parcel "A" alternative contains approximately 1.5 acre of CSS. The ROW alternative contains approximately 0.8 acre of CSS.

Southern Mixed Chaparral (Holland Code 37120) – 20.9 acres
Southern Mixed Chaparral (SMC) vegetation covers the vast majority of the project site. This dense and impenetrable habitat is dominated by large, hard-woody shrubs, such as Chamise *(Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), and San Diego Mountain Mahogany *(Cercocarpus minutifolius)*. SMC is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

The Parcel "A" alternative contains approximately 4.9 acres of SMC. The ROW alternative contains approximately 0.1 acre of SMC.

Non-native Grassland (Holland Code 42200) – 3.2 acres
Non-native Grassland (NNG) vegetation is found in the central area of the project site with a tiny patch on the northern property edge. This habitat is indicated by weedy annual Eurasian grasses, including Ripgut Brome *(Bromus diandrus)*, Slender Wild Oat *(Avena barbata)*, and many others. Native elements in the habitat include Slender-leaved Milkweed (*Asclepias fasciculatus*), Miniature Lupine *(Lupinus bicolor)*, Common Sand Aster (*Corethrogyne filaginifolia* var. *virgata*), and Fasciculated Tarplant *(Hemizonia fasciculata)*. NNG has the potential to be a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. This is because the County considers NNG to be significant raptor foraging habitat. The biological resource value of this habitat-type is low to moderate.

The Parcel "A" alternative contains approximately 0.1 acre of NNG. The ROW alternative contains approximately 0.2 acre of NNG.

Southern Riparian Scrub (Holland Code 63300) – 0.03 acre
Southern Riparian Scrub (SRS) is found in a few tiny patches within the site's drainages. This habitat is indicated by Mule Fat *(Baccharis salicifolia)* and Arroyo Willow *(Salix lasiolepis)*. The surrounding vegetation consists of very dense SMC. SRS is a sensitive habitat-type in San Diego County, as defined by Guidelines for Determining Significance. The biological resource value of this habitat-type is moderate to high.

The Parcel "A" alternative does not contain any impacts to SRS. The ROW alternative also does not contain any SRS.

Disturbed/Developed Habitat (Holland Code 11300/12000) – 0.7 acre
The central section of the property supports a paved road and several laterals that qualify as Disturbed/Developed Habitat (DH). These areas support either no vegetation (bare dirt, pavement) or only sparse ruderal weeds such as Perennial Mustard (*Hirschfeldia incana)* and Tocalote *(Centaurea melitensis)*. DH is a non-sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The areas mapped as DH have no biological value.

The Parcel "A" alternative contains approximately 0.6 acres of DH. The ROW alternative does not contain any DH.

Flora and Fauna

One hundred and forty-seven species of vascular plants and sixty-five species of animals were detected during the various field surveys of the property. These are listed in Table 2. This list represents a characteristic flora and fauna associated with this part of San Diego County in association with habitats similar to those found onsite.

Special Status Species

Special Status (or "sensitive") Species are those plants and animals listed as "Rare", "Threatened", "Endangered", "of Special Concern", or otherwise noteworthy by the County of San Diego, the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), the California Native Plant Society (CNPS), or other governmental or conservation agencies.

No sensitive plant species were observed during any of the surveys. A variety of sensitive plants are known from the general vicinity of the property, however. Most of these are either associated with habitats not found here (such as native grasslands, mafic chaparral, or vernal pools) or are large and distinctive perennials that would not have been missed if encountered onsite. Sensitive plants known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

The following fourteen sensitive animal species were observed on the T&R Mini-Storage MUP site during the various field surveys, with one additional species (Orange-throated Whiptail) detected during the most recent (2019) survey:

San Diego Coast Horned Lizard *(Phrynosoma coronatum blainvillei)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Northern California though coastal southern California into northern Baja California
Habitat: Open areas of scrub, chaparral and grassland in the presence of native harvester ant *(Pogonomyrmex* sp.*)*, which is the primary prey item for this lizard.
Status on site: A single individual was observed by others in the central portion of the site.

Coastal Western Whiptail *(Cnemidophorus tigris multiscutatus)*
Listing: State status: none
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)
Distribution: Cismontane areas of southern California south into Baja California Norte, Mexico
Habitat: Mainly inhabits coastal sage scrub and chaparral where it occurs in areas of friable soils on hillsides and in canyons but also may be found in open, dry riparian areas..
Status on site: Three individuals were observed by others in central portion of the site.

Orange-throated Whiptail *(Cnemidophorus hyperythrus beldingi)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Extreme southwestern California; from Orange and Riverside Counties south into northern Baja California.
Habitat(s): Inhabits coastal sage scrub, chaparral and areas of open brush with loose soils. May also be found in open, dry riparian areas. Sea level to about 1,800 feet MSL, occasionally higher on hot, south-facing slopes**.**

Status on site: A single individual was observed near the center of Parcel "A".

Cooper's Hawk *(Accipiter cooperii)*
Listing: "Species of Local Concern" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Watch List" (CDFW, 2009)
Distribution: Occurs throughout most of North America, from northern Mexico to southern Canada
Habitat: Inhabits a variety of woodlands, including oak woodlands, riparian and coniferous forests
Status on site: Observed by others in the northern portion of the site.

Bell's Sage Sparrow *(Amphispiza belli belli)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
Distribution: Cismontane areas of southern California and northern Baja California, Mexico. Also found on the west slopes of the Sierra Nevada Mountains
Habitat: Coastal Sage Scrub and chaparral. May also occur in other habitats such as juniper woodland and alluvial fan scrub
Status on site: Observed by others in sage scrub in two locations in the central portion of the site.

Red-shouldered Hawk *(Buteo lineatus)*
Listing: "Blue List" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Occurs over large areas of central and southern California west of the Sierras. Also occurs in Mexico, southeastern Canada, and the eastern United States.
Habitat: Roost and nest in a variety of woodland habitats: eucalyptus woodlands, oak groves, open riparian forests, and related broken wooded areas.
Status on Site: Single specimen was seen flying over the northern portion of the site

Turkey Vulture *(Cathartes aura)*
Listing: "Blue-list" (Tate, 1986)
"Declining" (Unitt, 1984)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Ranges from southern Canada to Argentina
Habitat: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.
Status on site: Several specimens were observed soaring overhead.

Barn Owl *(Tyto alba)*
Listing: "Blue-list" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal/State status: none
Distribution: Nearly worldwide in tropical and temperate regions
Habitat: In southern California, Barn Owls range and forage widely, nesting in many types of open cavities. Specimens roost in areas of thick vegetation or in buildings (hence the common name).
Status on site: Observed by others in the northern portion of the site.

Yellow Warbler *(Dendroica petechia brewsteri)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Nesting typically occurs in willow-dominated riparian areas from Canada to northern Mexico. Specimens overwinter in the area from Mexico south to South America. Yellow Warblers are found throughout San Diego County.
Habitat: Yellow Warblers breed during the summer in moist wooded habitats; however, they can be found most everywhere during migration. In San Diego County they are typically found in riparian thickets.
Status on site: Migratory specimens observed by others flying through the site during migration.

San Diego Black-tailed Jackrabbit *(Lepus californicus bennettii)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Cismontane and transmontane areas of southern California and adjacent areas of northern Baja California, Mexico
Habitat: Associated with areas of open chaparral, scrub, and grassland vegetation
Status on Site: Several observations made by others during the site surveys.

Mule Deer *(Odocoileus hemionus)*
Listing: State status: Regulated Game Animal (CDFW, 2012)
County status: San Diego County Sensitive Animal List (DPLU, 2010), Group 2; "MSCP Indicator" (DPLU, 1993)
Federal status: none
Distribution: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)
Habitat: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats; occasionally by sightings of specimens themselves
Status on site: Scat from this species was observed by others in NNG and CSS.

San Diego Desert Woodrat *(Neotoma lepida intermedia)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Coastal and desert areas of Southern California
Habitat: Open, dry, rocky hillsides in coastal sage scrub and chaparral
Status on site: Observed by others in the northern and central portions of the site.

White-tailed Kite / *Elanus leucurus*
Listing: "Fully Protected Raptor" (CDFW, 1999)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Fully Protected" (CFGC Sections 3511, 4700, 5050 & 5515)
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: White-tailed Kites breed primarily along the coastal lowland, and the species occurs over a broad area of the western U.S. through Mexico and into South America.
Habitat(s): Roost and nest in a variety of woodland habitats. Mainly riparian woodlands, oak groves, related habitats.
Status onsite: Single specimen observed during 2007 focused California Gnatcatcher survey. This species likely forages onsite on occasion due to the openness of the habitat.

Comments: Population numbers in San Diego County appear to have increased since the 1950's, and this species is not currently considered threatened or endangered.

Northwestern San Diego Pocket Mouse *(Chaetodipus fallax fallax)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: "Species of Concern" (USFWS, 2005)
Distribution: Occurs in Southwestern California, with subspecies *fallax* occurring on the coastal side of the mountains.
Habitat: Found in open areas of sage scrub, chaparral, and related open habitats
Status on site: Observed by others in the northern and central portions of the site.

A number of additional sensitive animals are known from general vicinity of property, however. Some of these have a reasonable probability of occurring on or utilizing this site, at least on an occasional basis. These include various native bats *(Choeronycteris, Eumops, Antrozous, Macrotus, Myotis, Nyctinomops)*, and other nocturnal or cryptic species. Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

Directed Field Survey for California Gnatcatcher

California Gnatcatcher *(Polioptila californica)*, a federally-listed Threatened Species, is known from habitat similar to that found on portions of the T&R Mini-Storage project site. Gnatcatchers occur in coastal and interior areas of coastal sage and related scrub habitats typically dominated by California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. Presence/absence field surveys for California Gnatcatcher were conducted by TeraCor biologist Samuel Reed in 2001 and again 2007. An updated gnatcatcher survey of the project development area, plus buffer, was completed by the Mrs. Robin Church of RC Biological Consulting, Inc. in 2012.

No California Gnatcatchers were detected on the T&R Mini-Storage project site during any of the field surveys, including the 2012 survey of a portion of the site. For this reason, the site is considered "unoccupied" by this federally-listed Threatened Species.

Jurisdictional Wetlands and Waterways – Wetland Survey

Wetlands and "waters" are present on portions of the project site in association with various onsite drainages and tributaries. These areas of the site support hydrophytes, hydric soils, and/or wetlands hydrology.

A directed RPO wetland survey was completed as a part of the biology study of the original MUP project site. This resulted in the preparation of a Wetland Survey Report, which indicated that the original project would not impact any jurisdictional wetlands or "waters", including RPO wetlands. In examining the other drainages on Parcel "A" and in the ROW, the project civil engineer determined that these other onsite drainages current have no drainage function due to the impacts caused by the placement of Interstate 15 to the west to the property, which severed the natural hydrology and the flows to these swales. Access to Parcel "A" for dirt and rock disposal under the Parcel "A" alternative would result in impacts to the remnant drainage within the existing North Centre City Parkway right-of-way, which is proposed to be filled

under the Parcel "A" alternative. Also impacted would be several remnant and non-functional drainages which cross the Parcel "A" site. Under the ROW alternative, no drainage swale impacts are anticipated.

Other Unique Features/Resources

The T&R Mini-Storage project site does not support any regionally-unique land features. The native and naturalized habitats found on this site are not unique to this area, and the property does not support any unusual biological features.

The site provides foraging habitat for various locally common species of raptors and other carnivores. No wildlife nursery sites were detected although faunal reproduction clearly does take place onsite in many areas, including underground, in bird nests, etc. There is potential for large mammals to use the site, and Mule Deer *(Odocoileus hemionus)* scat was reported to have been observed. This is in addition to other, urban-tolerant species such as skunks, coyotes, raccoons, etc. The probability for Mountain Lion *(Felix concolor)* to use the site is considered low.

The project falls entirely within the "I-15 corridor", and area of known passage for species such as California Gnatcatcher and others that move along the fragmented archipelago of CSS and other habitats from Escondido north to Riverside County. The T&R Mini-Storage project was redesigned to retain a functioning wildlife corridor that runs north-south within the property. The approved design provides a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the I-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement.

Significance of Project Impacts and Proposed Mitigation

The T&R Mini-Storage MUP project was subject to review under the California Environmental Quality Act (CEQA) and was required to provide compliance with the County's RPO and Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. This meant that the County required that project-related impacts to biological resources be "less than significant", as defined by CEQA, and that all RPO requirements and the Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources be met. This meant the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". All project-related impacts, as identified during the original CEQA analysis, were fully mitigated prior to the issuance of the MUP. Because the MUP is proposed for modification, additional impacts from the proposed materials disposal are anticipated. These have been incorporated into Table 3.

Direct and Indirect Impacts

Development of the T&R Mini-Storage MUP project site as proposed resulted in a number of project-related direct and indirect impacts. Direct impacts resulted from the actual removal of habitat, plants, and animals from the site through brushing clearing and grading. These direct impacts are considered permanent because they result in a conversion of habitats to buildings, landscaped areas, roads, etc. Indirect impacts

also affect plants, animals, and habitats that occur on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". The indirect impacts associated with site conversion are less quantifiable, due to the uncertainty associated with edge effects.

The following project-related impacts were identified with construction of the T&R Mini-Storage project. All of these impacts were mitigated as a part of the original MUP approvals and related permitting, reducing impacts to **less than significant**:

- 2.8 acres of CSS was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.9 acre of SMC was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.4 acre of NNG was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.1 acre of DH was impacted by development. The County of San Diego did not required mitigation for this loss pursuant to the "Guidelines for Determining Significance". The project impacted habitat for at least fourteen Special States Species, including five Group 1 bird species and nine Group 2 species. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- The project as approved impacted a functioning wildlife corridor that runs north-south within the "I-15 corridor". Impacts to this corridor were considered **less than significant** because adequate corridor width (315' onsite plus 100' offsite) was maintained and open space was placed over the corridor area to preserve the biological resources within it in perpetuity.

Modification of the MUP will result in additional project impacts, as follows:

<u>The Parcel "A" alternative for dirt and rock disposal will impact the following habitats:</u>

- 4.9 acre of SMC, 1.5 acre of CSS, and 0.1 acre of NNG would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance". This should be developed in negotiation with PDS staff.
- 0.6 acre of DH would be impacted by development. The County of San Diego will not require mitigation for this loss pursuant to the "Guidelines for Determining Significance".

<u>The ROW alternative for dirt and rock disposal will impact the following habitats:</u>

- 0.1 acre of SMC would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance". This should be developed in negotiation with PDS staff.
- 0.8 acre of CSS would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance". This should be developed in negotiation with PDS staff.
- 0.2 acre of NNG would be impacted by development. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance". This should be developed in negotiation with PDS staff.

Cumulative Impacts

Cumulative impacts refer to a project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects (Public Resources Code § 21083; California Code of Regulations, Title 14, § 15064[h], 15065[c], 15130, and 15355). Cumulative impacts can occur when individually minor but collectively significant projects take place over time.

A list of past, present and future projects that could cumulatively contribute to the projects significant impacts was compiled based on the defined study area. The study area was determined based on several factors including land use, habitats, draft North County MSCP boundaries and species ranges. The general boundaries of this study area extend from the draft North County MSCP PAMA boundaries to the north adjacent to Tierra Libertia Road, the Escondido city limits to the south and west and the draft North County MSCP PAMA boundaries to the east, approximately half the distance to North Broadway. The list of cumulative projects within this study area is as follows:

AD 07-057	HARTMAN, AD, LOT CLEARING
MUP 99-007	DRAGOO WINERY
MUP 04-050	RANCHO VERONA, MUP, GROUP RESIDENTIAL
MUP 10-003	CORTEL MUP CELL SITE TMO SD6110, P10-003
MUP 10-027	DOUGHERTY PET RESORT/MUP 10-027
MUP 84-112-01	THUNDERBIRD GOLF DRIVING RANGE
MUP 84-112-02	PRACTICE PERFECT GOLF RANGE
ZAP 02-032	JESMOND DENE / SPRINT
ZAP 00-145	SPRINT SDG&E / SPRINT
ZAP 00-059	WILLIAMS COMMUNICATIONS
STP 01-034	MESA ROCK RESIDENCE SITE PLAN
STP 01-045	LANTIS SITE PLAN
STP 03-019	CRV ESCONDIDO 68 SITE PLAN
STP 03-020	MONTREUX MODEL HOME
STP 99-038	HERALD LANTIS
STP 04-025	SITE PLAN FOR SFD IN I-15 CORRIDOR
STP 05-030	MONTREUX
STP 07-041	HARTMAN/STP/EASY TURF STORAGE BLDG
STP 08-015	ADJ HOLDINGS, SITE PLAN I-15 REVIEW, S 0
TM 5114	MONTREUX TM
TPM 19895	STEPHENS 4 LOT SPLIT - TPM
TPM 20420	LANTIS TPM
TPM 20879	KNOX TENTATIVE PARCEL MAP
TPM 21192	RUA MICHELLE, TPM 21192

Cumulative projects within the geographic scope of analysis would have the potential to result in impacts to Special Status Species, including various plants and animals, including loss of habitat. Of the 24 cumulative projects analyzed, 17 were either withdrawn or determined not to result in impacts to biological resources. The remaining 7 cumulative projects have the potential to impact habitat and sensitive species through clearing, grading, grubbing, trenching, and other construction activities.

Modification of the MUP project would result in additional impacts, including impacts to SMC and potentially CSS and NNG. These vegetation types are relatively well distributed in San Diego County, although all are sensitive and depleted in many areas. Therefore, from a regional perspective, the relatively minor impacts to the above vegetation types, although adverse and significant, are not cumulatively considerable when viewed in connection with the substantial acreages these habitat types remaining in the San Diego County region.

Impacts to the above habitats will be mitigated for in kind, reducing impacts to a level below significance. Fourteen sensitive species were observed on the project site. Impacts to these species, although adverse and potentially significant, are not cumulatively considerable when viewed in connection with the substantial numbers of these species remaining in the San Diego County region.

Furthermore, the project falls entirely within the "I-15 corridor", an area of known passage for species such as California gnatcatcher and others that move along the fragmented archipelago of coastal sage scrub and other habitats from Escondido north to Riverside County. The project was designed to retain a functioning wildlife corridor that runs north-south within the property. The project provided a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the 1-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement. With the recordation of onsite open space over the existing wildlife corridor, the project resulted in a less than significant impact to wildlife movement and would not result in a cumulatively considerable impact to wildlife movement in the study area.

In summary, with the mitigation requirements for biological resources on this site, the project would not result in cumulatively considerable impacts on sensitive habitats, sensitive species or existing wildlife movement.

Proposed Mitigation

Because both alternatives (Parcel "A" alternative and ROW alternative) will result in impacts to regulated habitats, and in order to satisfy the requirements of the County's "Guidelines for Determining Significance", and current County policy for mitigating impacts to habitats, Special Status Species, and Wildlife Corridor function, the following mitigation measures are recommended:

<u>The Parcel "A" mitigation alternative for dirt and rock disposal:</u>

1. The project shall provide mitigation at a 1:1 ratio for impacts to up to 4.9 acre of SMC, 1.5 acre of CSS, and 0.1 acre of NNG. This is equivalent to 4.9 acre of SMC, 1.5 acre of CSS, and 0.1 acre of NNG of required mitigation. This may be satisfied either <u>onsite</u> via the dedication of a Biological Open Space Easement over 6.5acres of this habitat (Figure 4) or <u>offsite</u> via the securement of no less than 1.9 acre-credit of SMC in a County-approved location. No mitigation for impacts to 0.6 acre of DH is required.

<u>The ROW mitigation alternative for dirt and rock disposal:</u>

1. The project shall provide mitigation at a 1:1 ratio for impacts to up to 0.1 acre of SMC. This is equivalent to 0.1 acre of required mitigation. This should be satisfied offsite via the securement of no less than 0.1 acre-credits of SMC in a County-approved location.
2. The project shall provide mitigation at a 2:1 ratio for impacts to up to 0.8 acres of CSS. This is equivalent to 1.6 acres of required mitigation. This should be satisfied offsite via the securement of no less than 1.6 acre-credits of CSS in a County-approved location.
3. The project shall provide mitigation at a 0.5:1 ratio for impacts to up to 0.2 acres of NNG. This is equivalent to 0.1 acre of required mitigation. It is recommended that this 0.1-acre mitigation obligation for NNG impacts be satisfied offsite via the securement of no less than 1.0 acre-credit of NNG in a County-approved location.
4. Because the ROW alternative will impact CSS, it may be necessary to process a Habitat Loss Permit (HLP) concurrent with modification of the MUP.

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Preparer and Persons/Organizations Contacted

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Certified Biological Consultant

Attachments

Figure 1. Regional Location
Figure 2. Recent Aerial Photograph
Figure 3. Biological Resources
Figure 4. Onsite OSE Alternative

Table 1. Field Surveys
Table 2 Flora and Fauna Detected
Table 3. Impact/Mitigation Analysis
Table 4. Sensitive Species Known from the Vicinity

Figure 1. Regional Location – T&R Mini-Storage Project Site
Portion of the U.S.G.S "Valley Center, California" 7.5′ Quadrangle

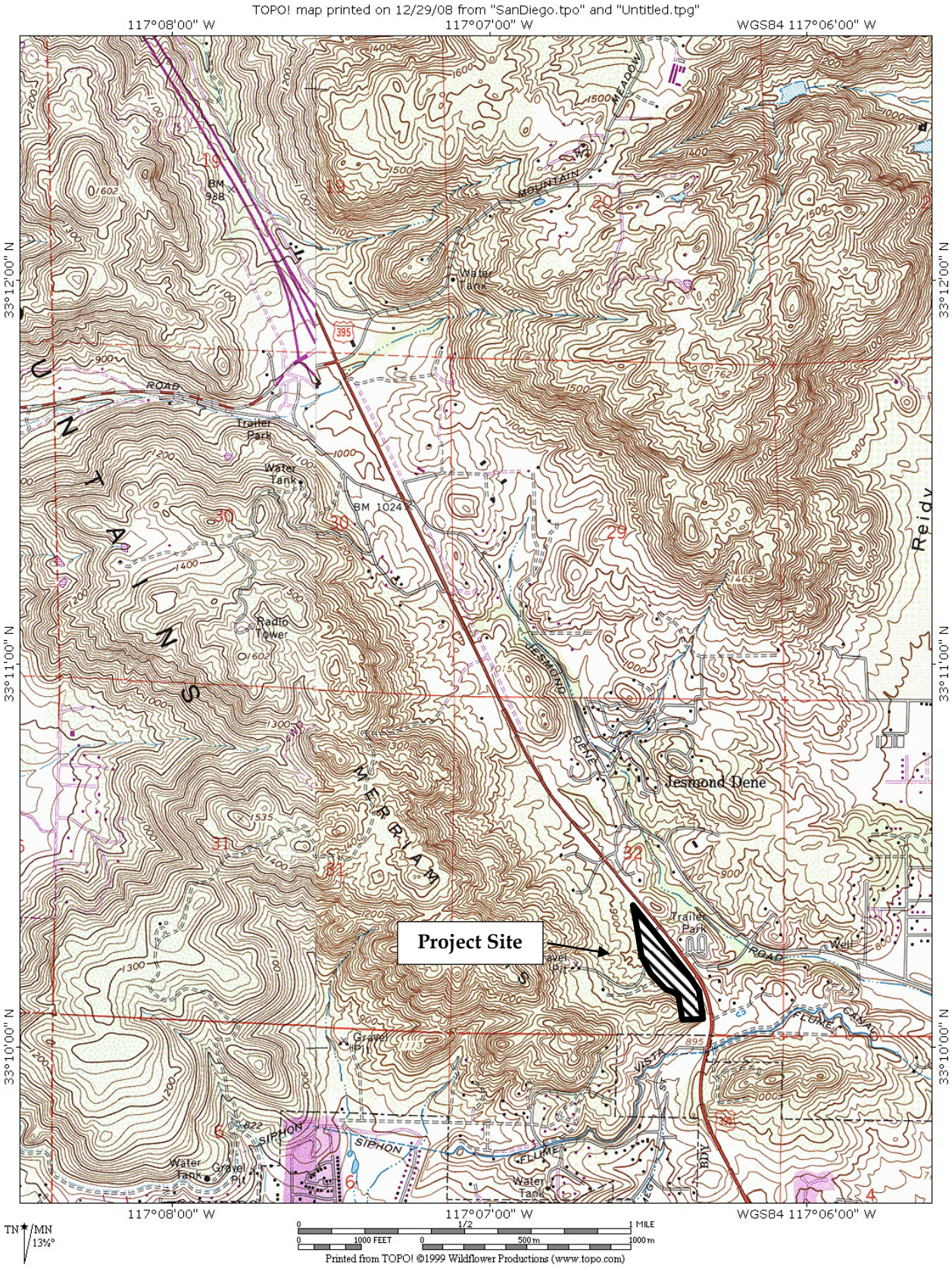

Figure 2. Recent Aerial Photograph – T&R Mini-Storage Project Site

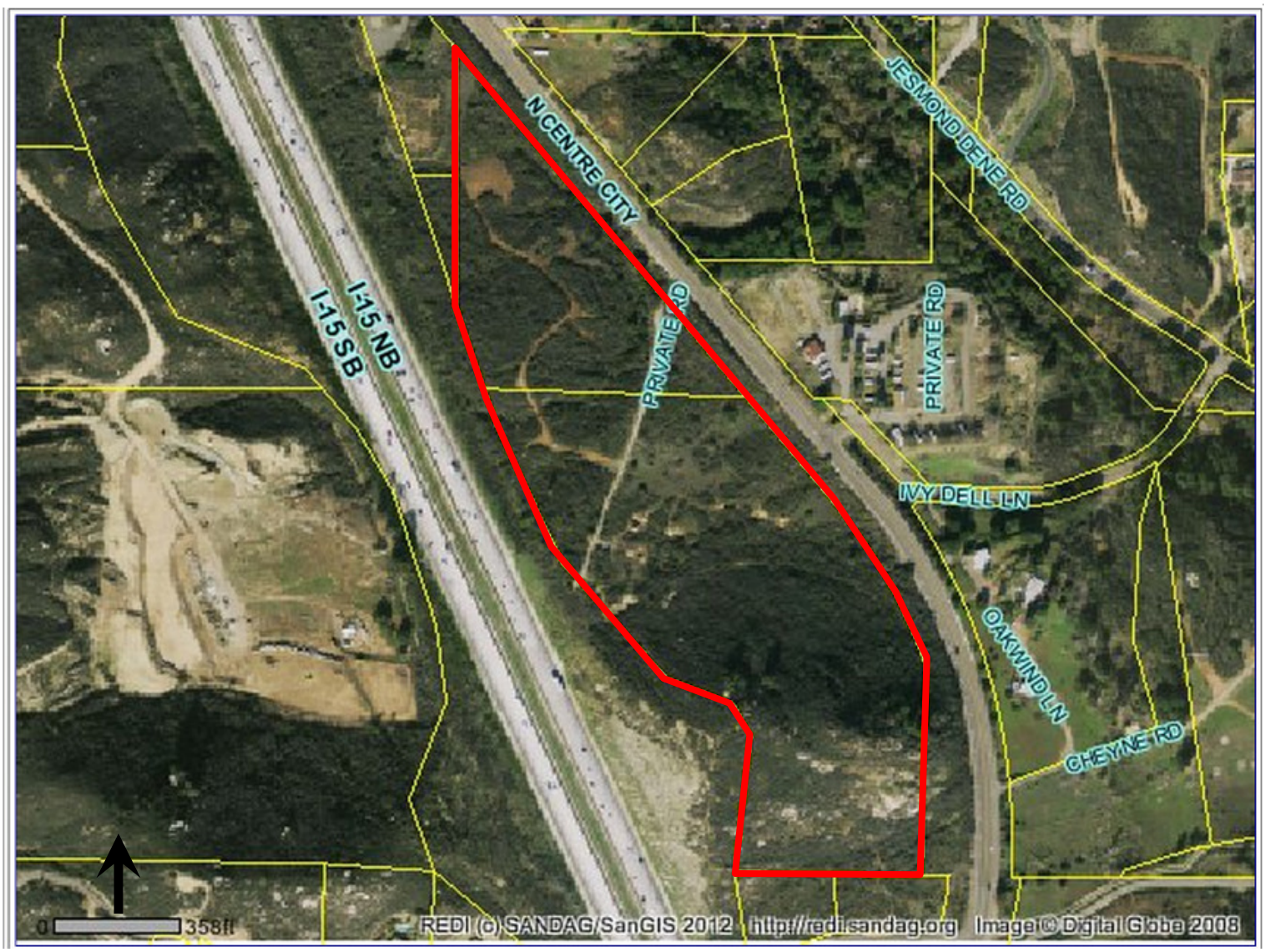

Figure 3. Biological Resources – T&R Mini-Storage Project Site

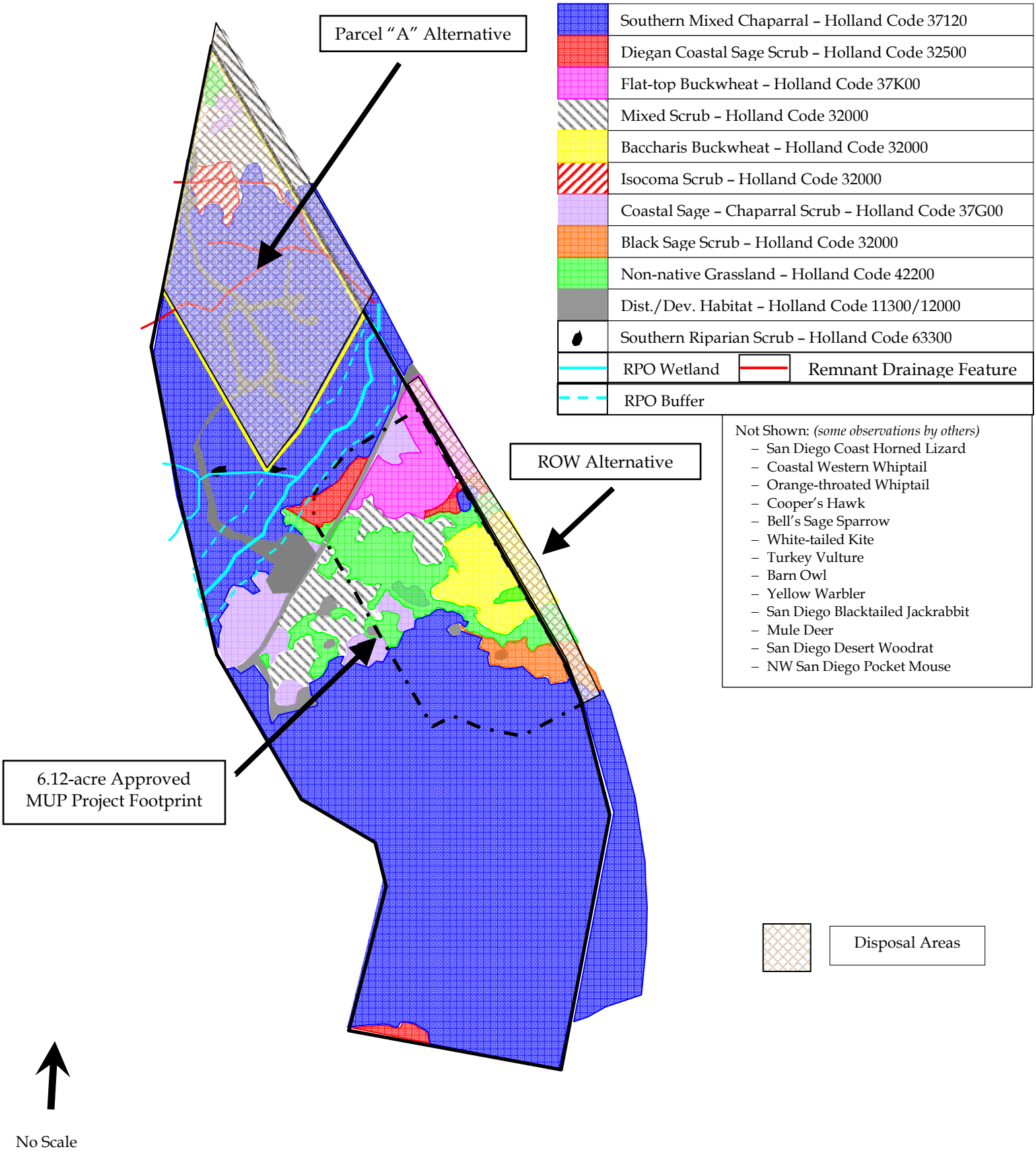

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
05 Mar 2001	SR	n/a[1]	Quino	n/a
16 Mar 2001	SR	n/a	Quino	n/a
24 Mar 2001	SR	n/a	Gnatcatcher	n/a
25 Mar 2001	SR	n/a	Quino	n/a
31 Mar 2001	SR	n/a	Gnatcatcher	n/a
03 Apr 2001	SR	n/a	Quino	n/a
13 Apr 2001	SR	n/a	Gnatcatcher + Quino	n/a
06 Dec 2002	SR	n/a	General	n/a
15 Jan 2003	SR, WM	n/a	General + Mapping	n/a
20 Jan 2003	SR, WM	n/a	General + Mapping	n/a
23 Jan 2003	SR, WM	n/a	General + Mapping	n/a
26 Jan 2003	SR, WM	n/a	General + Mapping	n/a
10 Mar 2003	SR ?	n/a	Wetlands	n/a
01 Apr 2003	SR ?	n/a	Wetlands	n/a
08 May 2003	SR	n/a	Floral	n/a

[1] *n/a – data not available*

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
30 Mar 2007	SR ?	n/a	Gnatcatcher	n/a
07 Apr 2007	SR	n/a	Gnatcatcher	n/a
15 Apr 2007	SR ?	n/a	Gnatcatcher	n/a
18 Apr 2007	PV	n/a	Kangaroo Rat	n/a
19 Apr 2007	PV	n/a	Kangaroo Rat	n/a
20 Apr 2007	PV	n/a	Kangaroo Rat	n/a
22 Apr 2007	PV	n/a	Kangaroo Rat	n/a
23 Apr 2007	PV	n/a	Kangaroo Rat	n/a
24 Apr 2007	PV	n/a	Kangaroo Rat	n/a
02 May 2007	SR ?	n/a	Gnatcatcher	n/a
15 May 2007	SR ?	n/a	Gnatcatcher	n/a
22 May 2007	SR ?	n/a	Gnatcatcher	n/a
27 Sep 2011	VS	10:00-12:45	General	Clear skies, temps in the high 70°s to low 90°s, no wind
12 Oct 2011	VS	08:45-12:30	General + Mapping	Clear skies, temps in the low 80°s to high 90°s, no wind
06 Jan 2012	VS	08:45-12:30	General + Wetlands	Clear skies, temps in the low 60°s, no wind
31 May 2019	VS, BM	09:00-02:30	MUP Update	Clear skies, temps in the mid 70°s, no wind

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants	
Acmispon glaber	Deerweed
Acourtia microcephala	Sacapellote
Adenostoma fasciculatum	Chamise
Ailanthus altissima *	Tree Of Heaven
Amsinckia sp.	Fiddleneck
Antirrhinum nuttallianum	Nuttall's Snapdragon
Artemisia californica	California Sagebrush
Artemisia douglasiana	Mugwort
Asclepias fascicularis	Narrowleaf Milkweed
*Avena barbata**	Slender Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis salicifolia	Mule Fat
Baccharis sarothroides	Broom Baccharis
Brassica nigra *	Black Mustard
Brickellia californica	Bricklebush
Bromus diandrus *	Ripgut Brome
Bromus hordeaceus *	Common Soft-Brome
Bromus rubens *	Red Brome
Calystegia macrostegia	Morning-Glory
Camissonia hirtella	Evening Primrose
Camissoniopsis bistorta	California Sun Cup
Capsella bursa-pastoris	Shepherd's Purse
Carduus pycnocephalus *	Italian Thistle
Carex triquetra	Trigonous Sedge
Castilleja densiflora	Parish's Owl's-Clover
Ceanothus tomentosus	Woollyleaf Ceanothus
Centaurea melitensis *	Tocalote
Cercocarpus minutifolius	San Diego Mountain-Mahogany
Chaenactis glabriuscula	Glabriuscula
Cirsium occidentale	Cobwebby Thistle
Claytonia parviflora	Narrow-Leaved Miner's Lettuce
Clematis pauciflora	Rope-Vine
Conium maculatum *	Poison Hemlock
Cordylanthus rigidus	Stiffbranch Bird's Beak
Corethrogyne filaginifolia var. virgata	Common Sand Aster
Crassula connata	Pygmy-Weed
Cryptantha intermedia	Common Cryptantha
Cuscuta californica	California Dodder
Cyperus sp.	Sedge
Daucus pusillus	American Wild Carrot
Deinandra fasciculata	Clustered Tarweed
Dicentra chrysantha	Golden Eardrops
Dichelostemma pulchellum	Blue Dicks
Diplacus x australis	San Diego Monkeyflower
Dudleya pulverulenta	Chalk Live-Forever
Encelia farinosa *	Brittle Bush
Eriastrum filifolium	Lavender Woollystar
Eriogonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
*Erodium cicutarium**	Filaree

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Erythranthe guttata	Seep Monkeyflower
Eucrypta chrysanthemifolia	Common Eucrypta
*Euphorbia peplus**	Petty Spurge
Foeniculum vulgare	Fennel
Galium sp.	Bedstraw
Hazardia squarrosa	Saw-Toothed Goldenbush
Helianthemum scoparium	Peak Rush-Rose
Helianthus gracilentus	Sunflower
Heteromeles arbutifloia	Toyon
*Hirschfeldia incana**	Perennial Mustard
*Hordeum sp.**	Wild Barley
*Hypochaeris glabra **	Smooth Cat's Ear
Isocoma menziesii	Goldenbush
Keckiella antirrhinoides	Chaparral Beardtongue
Keckiella cordifolia	Climbing Bush Penstemon
*Lamarckia aurea**	Goldentop
Lepidium nitidum var. nitidum	Shining Peppergrass
Leymus condensatus	Giant Wild Rye
Linaria canadensis	Blue Toadflax
*Lobularia maritima **	Sweet Alyssum
*Logfia filaginoides**	California Cottonrose
*Logfia gallica **	Narrowleaf Cottonrose
Lonicera subspicata	Southern Honeysuckle
Lotus scoparius	Deer Weed
Lupinus bicolor	Miniature Lupine
Lupinus sp.	Lupine
Lysimachia arvensis	Scarlet Pimpernel
Malacothamnus fasciculatus	Bushmallow
Malosma laurina	Laurel Sumac
*Malva parviflora**	Cheese Weed
Marah marcocarpus	Wild Cucumber
*Marrubium vulgare**	Horehound
Mimulus guttatus	Monkey Flower
Mirabilis sp.	Wishbone Bush
Muhlenbergia rigens	Deer Grass
Muhlenbergia sp.	Muhly
Nassella lepida	Foothill Needle Grass
Nassella pulchra	Purple Needle-Grass
Navarretia hamata	Hooked Navarretia
Nicotiana glauca	Tree Tobacco
*Olea europa **	European Olive
Oxalis micrantha	Dwarf Woodsorrel
Paeonia californica	California Peony
Pectocarya penicillata	Pectocarya
Penstemon spectabilis	Showy Penstemon
Pentagramma triangularis	Goldback Fern
Phacelia cicutaria	Caterpillar Phacelia
Phacelia grandiflora	Big-Flower Phacelia
Phacelia minor	Canterbury Bells
Phacelia parryi	Parry Phacelia
Phacelia ramosissima	Scorpionweeds
Phacelia sp.	Phacelia

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Phoenix canariensis *	Canary Island Palm
Pityrogramma triangularis var. *triangularis*	Goldenback Fern
Polycarpon tetraphyllum	Fourleaf Manyseed
Polypodium californicum	California Polypody
Prunus ilicifolia	Holly-Leafed Cherry
Pseudognaphalium beneolens	Fragrant Everlasting
Pseudognaphalium bolettii	Bicolored Cudweed
Pseudognaphalium californicum	California Cudweed
Pseudognaphalium stramineum *	Cudweed
Pterostegia drymarioides	Fairy Mist
Quercus x acutidens	Torrey's Hybrid Oak
Quercus agrifolia	Coast Live Oak
Quercus berberidifolia	Scrub Oak
Rhamnus crocea	Spiny Redberry
Rhamnus ilicifolia	Holly-Leaf Redberry
Rhus aromatica	Fragrant Sumac
Rhus integrifolia	Lemonadeberry
Rhus ovata	Sugar Bush
Ribes indecorum	White Flowering Currant
Salix lasiolepis	Arroyo Willow
Salvia apiana	White Sage
Salvia mellifera	Black Sage
Sambucus cerulea	Blue Elder
Sanicula crassicaulis	Sanicula
Schismus barbatus *	Mediterranean Grass
Scrophularia californica	California Bee Plant
Selaginella sp.	Spike-Moss
Sisyrinchium bellum	Blue-Eyed Grass
Solanum americanum *	Nightshade
Solanum parishii	Parish's Nightshade
Sonchus asper *	Prickly Sowthistle
Stephanomeria exigua	Small Wire-Lettuce
Stylocline gnaphaloides	Everlasting Neststraw
Thysanocarpus sp.	Lacepod
Toxicodendron diversilobum	Poison Oak
Triodanis biflora	Venus' Looking-Glass
Vulpia myuros *	Rat's-Tail Fescue
Xylococcus bicolor	Mission Manzanita
Yucca whipplei	Foothill Yucca
Zeltnera venusta	California Centaury

Birds

Accipiter cooperii	**Cooper's Hawk**
Amphispiza belli belli	**Sage Sparrow**
Aphelocoma coerulescens	Scrub Jay
Archilochus alexandri	Black-Chinned Hummingbird
Baeolophus inornatus	Oak Titmouse
Buteo jamaicensis	Red-Tailed Hawk
Buteo lineatus	**Red-Shouldered Hawk**
Callipepla californicus	California Quail
Calypte anna	Anna's Hummingbird

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Carduelis psaltria	Lesser Goldfinch
Carduelis tristis	American Goldfinch
Carpodacus mexicanus	House Finch
Cathartes aura	**Turkey Vulture**
Chamaea fasciata	Wrentit
Colaptes auratus	Northern Flicker
Columba livia *	Rock Dove
Corvus brachyrhynchos	American Crow
Corvus corax	Common Raven
Dendroica coronata	Audubon's Warbler
Dendroica coronata	Yellow-Rumped Warbler
Dendroica petechia	**Yellow Warbler**
Elanus leucurus	**White-Tailed Kite**
Euphagus cyanocephalus	Brewer's blackbird
Falco sparverius	American kestrel
Geococcyx californicus	Greater Roadrunner
Guiraca caerulea	Blue Grosbeak
Icterus bullockii	Bullock's Oriole
Melospiza melodia	Song Sparrow
Mimus polyglottos	Northern Mockingbird
*Passer domesticus**	House Sparrow
Picoides pubescens	Downy Woodpecker
Pipilo crissalis	California Towhee
Pipilo erythrophthalmus	Spotted Towhee
Polioptila caerulea	Blue-Gray Gnatcatcher
Psaltriparus minimus	Bushtit
Sayornis nigricans	Black Phoebe
Sitta carolinensis	White-Breasted Nuthatch
Stelgidopteryx seripennis	Northern Rough-Winged Swallow
*Sturnus vulgaris *	European Starling
Thryomanes bewickii	Bewick's Wren
Toxostoma redivivum	California Thrasher
Trogoldytes aedon	House Wren
Tyrannus verticalis	Western Kingbird
Tyto alba	**Barn Owl**
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-Crowned Sparrow

Mammals

Canis latrans	Coyote
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse
Dipodomys agilis	Pacific Kangaroo Rat
Lepus californicus bennettii	**San Diego Black-tailed Jackrabbit**
Neotoma lepida	**San Diego Desert Woodrat**
Odocoilus hemionus	**Mule Deer**
Peromyscus maniculatis	Deer Mouse
Procyon lotor	Raccoon
Spermophilus beecheyi	California Ground Squirrel
Sylvilagus audubonii	Desert Cottontail

Amphibians and Reptiles

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Batrachoseps major	Garden Salamander
Bufo boreas	Western Toad
Cnemidophorus tigris multiscutatus	**Coastal Western Whiptail**
Cnemidophorus hyperythrus beldingi	**Orange-throated Whiptail**
Lampropeltis californiae	California King Snake
Phrynosoma coronatum blainvillei	**San Diego Horned Lizard**
Pseudacris regilla	Pacific Chorus Frog
Sceloporus occidentalis	Western Fence Lizard
Uta stansburiana	Side-Blotched Lizard

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* – non-native taxon
bold – sensitive taxon

Table 3. Habitat Impact/Mitigation Analysis – T&R Mini-Storage MUP Modification Project Site

Parcel "A" Alternative				
Biological Resource	Total [2]	Impacted	Impact Neutral	Mitigation Required
SMC	4.9 acres	4.9 acres	none	4.9 acres @ 1:1
CSS	1.5 acres	1.5 acres	none	1.5 acres @ 1:1
NNG	0.1 acre	0.1 acre	none	0.1 acre @ 1:1
DH	0.6 acres	0.6 acre	none	none

ROW Alternative				
Biological Resource	Total	Impacted	Impact Neutral	Mitigation Required
SMC	0.1 acre	0.1 acre	none	0.1 acres @ 1:1
CSS	0.8 acre	0.8 acre	none	1.9 acres @ 2:1
NNG	0.2 acre	0.2 acre	none	0.1 acre @ 0.5:1

[2] - *Number may not add up because all acreage calculations are rounded per County requirements: nearest 1/10th acre for upland habitats and nearest 1/100th acre for wetland habitats.*

Table 4. Sensitive Species Known from the Vicinity – T&R Mini-Storage Project Site

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Arctostaphylos rainbowensis	Rainbow Manzanita					A		X																	L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A			X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D		X				X													L	1a
Harpagonella palmeri	Palmer's Grappling Hook					D	X		X			X													L	1a
Horkelia truncata	Ramona Horkelia					A		X																	L	1a
Monardella hypoleuca lanata	Felt Leaved Rock Mint					A		X				X													L	1a
Nolina cismontana	Chaparral Beargrass					A		X				X													L	1b
Piperia leptopetala	Narrow-Petaled Rein Orchid					D		X			X	X	X												M	2b
Polygala cornuta fishiae	Fish's Milkwort					D		X				X													L	2b
Satureja chandleri	San Miguel Savory					A		X				X													L	1a
Senecio ganderi	Gander's Butterweed			X		A		X				X													L	1a
Tetracoccus dioicus	Parry's Tetracoccus					A		X				X													L	1b
Accipiter cooperi	Cooper's Hawk						X	X	X	X	X	X	X	X							X				O	--
Accipiter striatus	Sharp-Shinned Hawk						X	X		X	X	X	X	X											M	2a
Agelaius tricolor	Tricolored Blackbird								X	X						X								X	L	1a
Aimophila ruficep canescens	Rufous-Crowned Sparrow						X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow								X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow						X	X				X													O	--
Anniella pulchra pulchra	Silvery Legless Lizard						X		X	X												X			M	2a
Antrozous pallidus	Pallid Bat						X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle				X		X	X	X		X	X	X	X	X										L	1c
Bassariscus astutus	Ringtail							X		X	X	X													L	1a
Buteo lineatus	Red-Shouldered Hawk						X	X	X	X	X	X	X	X											O	--
Cathartes aura	Turkey Vulture						X	X	X	X	X	X	X	X											O	--
Chaetodipus c. femoralis	Dulzura CA Pocket Mouse						X	X	X		X	X	X												M	2a
Chaetodipus fallax fallax	NW San Diego Pocket Mouse						X	X	X			X					X	X							O	--
Charina trivirgata roseofusca	Coastal Rosy Boa						X	X			X	X													M	2a
Circus cyaneus hudsonius	Northern Harrier						X		X							X			X					X	M	2a
Cnemidophorus hyperythrus	Orange-Throated Whiptail						X	X	X	X		X													O	--
Cnemidophorus t. multiscutatus	Coastal Western Whiptail							X		X	X	X													O	--
Coleonyx variegatus abbotti	SD Banded Gecko						X		X			X													L	1a
Corynorhinus townsendii	Townsend's Bigeared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	N. Red Diamond Rattlesnake						X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				H	3a
Dendroica petechia brewsteri	Yellow Warbler						X	X		X	X	X	X	X											O	--
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											H	3a
Dipodomys stephensi	Stephen's Kangaroo Rat	X	X				X		X																L	1a
Elanus leucurus	White-tailed Kite								X	X															O	--
Eremophila alpestris actis	Horned Lark								X												X				M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Larus californicus	California Gull (Non-Breeding)								X							X			X		X	X	X		L	1a
Lepus californicus bennettii	San Diego Black-tailed Jackrabbit						X	X	X		X	X	X	X											O	--
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X	X	M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X	X		X	X	X	X	X	X									O	--

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
Perognathus longimembris brevinasus	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
Tyto alba	Barn Owl						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	O	--

Probability of Occurrence Codes:
L – Low Probability; rare species in area. Most of these species occur on habitat not found on the project site, including vernal pools, coastal dunes, etc. California Red-legged Frogs and Yellow-billed Cuckoo are two examples of species that fit into this category. Both are extremely rare in California.
M – Moderate Probability. Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the subject property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite
H – High Probability. Most of these species are expected to use the project site, but are difficult to reliably detect. Examples include fossorial reptiles and amphibians, wide-ranging birds, etc.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)
1c – obvious species that would have been seen or otherwise detected if present (animal)
2a - could possibly occur onsite on at least an occasional basis, based on habitat quality (animal)
2b - could occur onsite, but very rare, and/or species poorly known to science (plant)
3a - nearly certain to occur onsite on a regular basis, but cryptic, seasonal, or otherwise difficult to detect (animal)
3b – cryptic or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plant)

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~ UPDATED ~
SUMMARY BIOLOGY REPORT
Biological Resources, Project Impacts, and Mitigation

T&R MINI STORAGE MAJOR USE PERMIT & EXTENDED GRADING PERMIT
PDS2005-3300-05-052 & PDS2008-3710-08-0044
ENVIRONMENTAL LOG NO.: PDS2005-3910-0508031
APN 187-170-48 and -49
County of San Diego

Updated September 2019

Summary

The T&R Mini-Storage Major Use Permit project site consists of 31.7 acres of partially-cleared land (APN 187-170-48-00 and APN 187-170-49-00) located at between I-15 and North Centre City Parkway in the Escondido area of unincorporated San Diego County, California. The approved project included a Major Use Permit (MUP), a Grading Permit, and a boundary adjustment that created a new 6.0-acre parcel (Parcel "A") from the original property acreage. This 6.0-acre area is now being examined as part of an extended Grading Permit. Habitats onsite and surrounding the property include chaparral, scrubs, non-native grassland, disturbed/developed, and riparian. The approved project removed approximately 6.12 acres of chaparral, scrub, non-native grassland, and disturbed/developed habitat as a part of site development. These original impacts were mitigated by onsite open space dedication and offsite mitigation credit purchase.

At this time, the approved Grading Permit is proposed to be extended to allow the disposal of approximately 65,000 cubic yards of soil and rock materials from the original MUP site (Parcel "B") onto a portion of the 6.0-acre Parcel "A" (Figure 4). Parcel "A" supports native vegetation, including scrub and chaparral.

Introduction, Project Description, Location, and Setting

The Updated T&R Mini-Storage project consists of an extension of an approved Grading Permit that allows the development of a commercial storage facility on approximately 6.12 acres of the APN 187-170-48-00 and APN 187-170-49-00 site (Parcel "B"). An approximately 6.0-acre parcel (Parcel "A"), which was created as part of the MUP process, is now being proposed for dirt and rock disposal from the approved construction area. Parcel "A" is currently in a natural state other than areas that were cleared for geotechnical exploration years ago and which are regrowing with natives at this time. The extended Grading Permit will impact a total of 4.68 gross acres (rounded to 4.7 acres, per County requirements) of 6.0-acre Parcel "A" including an adjacent portion of the North Centre City Parkway right-of-way for ingress (see Figure 4). This disposal will require that the material to be exported from the construction area be transported to Parcel "A" for proper placement.

The remnant drainage within the right-of-way would be filled to allow access from North Centre City Parkway and Parcel "A" would be mostly covered with material from the Mini-Storage project MUP site.

The location of the project site is west of North Centre City Parkway and east of Interstate Highway 15 in the Escondido area of unincorporated San Diego County (Figure 1). Various forms of chaparral, scrub, grassland, disturbed/developed, and riparian are the only plant communities (habitats) found onsite, with these same habitats also present offsite (Figure 3).

Biological field surveys of the T&R Mini-Storage MUP project site have been completed by various investigators since at least 2002, including Samuel Reed (SR), W. McTeer (WM), Philippe Vergne (PV), Mrs. Church (RC), and most recently Vincent Scheidt (VS) and Brandon Myers (BM). Survey data (dates, personnel, hours, study focus, and weather conditions) are presented in Table 1. Older biology reports for this property have been prepared by TeraCor (2003) and Helix Environmental (2009). Data from those older documents have been incorporated, where applicable, into this report.

The purpose of the most current field survey was to update the site's flora and fauna (Table 2), potential impacts associated with the Grading Permit extension (Table 3), and any associated new mitigation requirements. A second purpose was to verify the presence/absence of jurisdictional lands and various special status plant and animal species which are known to occur in the general vicinity of this property and specifically in association with the Parcel "A" (Table 4).

Habitats/Vegetation Communities

The T&R Mini-Storage project site supports a diversity of native and non-native, naturalized vegetation types. The central section of the site, where development is underway, supports various scrubs and other successional plant associations that have developed on old disturbed areas. The balance of the site is more-or-less natural. The habitats associated with the original 31.7-acre MUP site include the following:

Southern Mixed Chaparral (Holland Code 37120) – 20.9 acres total, 4.9 acres on Parcel "A" + access
Southern Mixed Chaparral (SMC) vegetation covers the vast majority of the project site. This dense and impenetrable habitat is dominated by large, hard-woody shrubs, such as Chamise *(Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), and San Diego Mountain Mahogany *(Cercocarpus minutifolius)*. SMC is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Coastal Scrub (Holland Code 32000) – 6.9 acres total, 1.5 acres on Parcel "A"
Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat-type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage – Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC proper. Soft-woody shrubs are present in the Coastal Sage – Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of

CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Non-native Grassland (Holland Code 42200) – 3.2 acres total, 0.1 acre on Parcel "A"
Non-native Grassland (NNG) vegetation is found in the central area of the project site with a tiny patch on the northern property edge. This habitat is indicated by weedy annual Eurasian grasses, including Ripgut Brome *(Bromus diandrus),* Slender Wild Oat *(Avena barbata),* and many others. Native elements in the habitat include Slender-leaved Milkweed (*Asclepias fasciculatus*), Miniature Lupine *(Lupinus bicolor)*, Common Sand Aster (*Corethrogyne filaginifolia* var. *virgata*), and Fasciculated Tarplant *(Hemizonia fasciculata)*. NNG has the potential to be a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. This is because the County considers NNG to be significant raptor foraging habitat. The biological resource value of this habitat-type is low to moderate.

Southern Riparian Scrub (Holland Code 63300) – 0.03 acre, 0.0 acres on Parcel "A"
Southern Riparian Scrub (SRS) is found in a few tiny patches within the site's drainages. This habitat is indicated by Mule Fat *(Baccharis salicifolia)* and Arroyo Willow *(Salix lasiolepis)*. The surrounding vegetation consists of very dense SMC. SRS is a sensitive habitat-type in San Diego County, as defined by Guidelines for Determining Significance. The biological resource value of this habitat-type is moderate to high.

Disturbed/Developed Habitat (Holland Code 11300/12000) – 0.7 acre, 0.0 acre on Parcel "A"
The central section of the property supports a paved road and several laterals that qualify as Disturbed/Developed Habitat (DH). These areas support either no vegetation (bare dirt, pavement) or only sparse ruderal weeds such as Perennial Mustard (*Hirschfeldia incana)* and Tocalote *(Centaurea melitensis).* DH is a non-sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The areas mapped as DH have no biological value.

Flora and Fauna

One hundred and forty-seven species of vascular plants and sixty-five species of animals were detected during the various field surveys of the property. These are listed in Table 2. This list represents a characteristic flora and fauna associated with this part of San Diego County in association with habitats similar to those found onsite.

Special Status Species

Special Status (or "sensitive") Species are those plants and animals listed as "Rare", "Threatened", "Endangered", "of Special Concern", or otherwise noteworthy by the County of San Diego, the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), the California Native Plant Society (CNPS), or other governmental or conservation agencies.

No sensitive plant species were observed during any of the surveys. A variety of sensitive plants are known from the general vicinity of the property, however. Most of these are either associated with habitats not found here (such as native grasslands, mafic chaparral, or vernal pools) or are large and distinctive perennials that would not have been missed if encountered onsite. Sensitive plants known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

The following fourteen sensitive animal species were observed on the T&R Mini-Storage MUP site during the various field surveys, with one additional species (Orange-throated Whiptail) detected during the most recent (2019) survey:

San Diego Coast Horned Lizard *(Phrynosoma coronatum blainvillei)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Northern California though coastal southern California into northern Baja California
Habitat: Open areas of scrub, chaparral and grassland in the presence of native harvester ant *(Pogonomyrmex* sp.*)*, which is the primary prey item for this lizard.
Status on site: A single individual was observed by others in the central portion of the site.

Coastal Western Whiptail *(Cnemidophorus tigris multiscutatus)*
Listing: State status: none
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)
Distribution: Cismontane areas of southern California south into Baja California Norte, Mexico
Habitat: Mainly inhabits coastal sage scrub and chaparral where it occurs in areas of friable soils on hillsides and in canyons but also may be found in open, dry riparian areas..
Status on site: Three individuals were observed by others in central portion of the site.

Orange-throated Whiptail *(Cnemidophorus hyperythrus beldingi)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Extreme southwestern California; from Orange and Riverside Counties south into northern Baja California.
Habitat(s): Inhabits coastal sage scrub, chaparral and areas of open brush with loose soils. May also be found in open, dry riparian areas. Sea level to about 1,800 feet MSL, occasionally higher on hot, south-facing slopes**.**
Status on site: A single individual was observed near the center of Parcel "A".
Cooper's Hawk *(Accipiter cooperii)*
Listing: "Species of Local Concern" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Watch List" (CDFW, 2009)
Distribution: Occurs throughout most of North America, from northern Mexico to southern Canada
Habitat: Inhabits a variety of woodlands, including oak woodlands, riparian and coniferous forests
Status on site: Single specimen observed on Parcel "A" during 2019 survey.

Bell's Sage Sparrow *(Amphispiza belli belli)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
Distribution: Cismontane areas of southern California and northern Baja California, Mexico. Also found on the west slopes of the Sierra Nevada Mountains
Habitat: Coastal Sage Scrub and chaparral. May also occur in other habitats such as juniper woodland and alluvial fan scrub
Status on site: Observed by others in sage scrub in two locations in the central portion of the site.

Red-shouldered Hawk *(Buteo lineatus)*
Listing: "Blue List" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Occurs over large areas of central and southern California west of the Sierras. Also occurs in Mexico, southeastern Canada, and the eastern United States.
Habitat: Roost and nest in a variety of woodland habitats: eucalyptus woodlands, oak groves, open riparian forests, and related broken wooded areas.
Status on Site: Single specimen was seen flying over the northern portion of the site

Turkey Vulture *(Cathartes aura)*
Listing: "Blue-list" (Tate, 1986)
"Declining" (Unitt, 1984)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Ranges from southern Canada to Argentina
Habitat: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.
Status on site: Several specimens were observed soaring overhead.

Barn Owl *(Tyto alba)*
Listing: "Blue-list" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal/State status: none
Distribution: Nearly worldwide in tropical and temperate regions
Habitat: In southern California, Barn Owls range and forage widely, nesting in many types of open cavities. Specimens roost in areas of thick vegetation or in buildings (hence the common name).
Status on site: Observed by others in the northern portion of the site.

Yellow Warbler *(Dendroica petechia brewsteri)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Nesting typically occurs in willow-dominated riparian areas from Canada to northern Mexico. Specimens overwinter in the area from Mexico south to South America. Yellow Warblers are found throughout San Diego County.
Habitat: Yellow Warblers breed during the summer in moist wooded habitats; however, they can be found most everywhere during migration. In San Diego County they are typically found in riparian thickets.
Status on site: Migratory specimens observed by others flying through the site during migration.

San Diego Black-tailed Jackrabbit *(Lepus californicus bennettii)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Cismontane and transmontane areas of southern California and adjacent areas of northern Baja California, Mexico
Habitat: Associated with areas of open chaparral, scrub, and grassland vegetation
Status on Site: Several observations made by others during the site surveys.

Mule Deer *(Odocoileus hemionus)*
Listing: State status: Regulated Game Animal (CDFW, 2012)
County status: San Diego County Sensitive Animal List (DPLU, 2010), Group 2; "MSCP Indicator" (DPLU, 1993)
Federal status: none
Distribution: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)
Habitat: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats; occasionally by sightings of specimens themselves
Status on site: Scat from this species was observed by others in NNG and CSS.

San Diego Desert Woodrat *(Neotoma lepida intermedia)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Coastal and desert areas of Southern California
Habitat: Open, dry, rocky hillsides in coastal sage scrub and chaparral
Status on site: Observed by others in the northern and central portions of the site.

White-tailed Kite / *Elanus leucurus*
Listing: "Fully Protected Raptor" (CDFW, 1999)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Fully Protected" (CFGC Sections 3511, 4700, 5050 & 5515)
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: White-tailed Kites breed primarily along the coastal lowland, and the species occurs over a broad area of the western U.S. through Mexico and into South America.
Habitat(s): Roost and nest in a variety of woodland habitats. Mainly riparian woodlands, oak groves, related habitats.
Status onsite: Single specimen observed during 2007 focused California Gnatcatcher survey. This species likely forages onsite on occasion due to the openness of the habitat.
Comments: Population numbers in San Diego County appear to have increased since the 1950's, and this species is not currently considered threatened or endangered.

Northwestern San Diego Pocket Mouse *(Chaetodipus fallax fallax)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: "Species of Concern" (USFWS, 2005)
Distribution: Occurs in Southwestern California, with subspecies *fallax* occurring on the coastal side of the mountains.
Habitat: Found in open areas of sage scrub, chaparral, and related open habitats
Status on site: Observed by others in the northern and central portions of the site.

A number of additional sensitive animals are known from general vicinity of property, however. Some of these have a reasonable probability of occurring on or utilizing this site, at least on an occasional basis. These include various native bats *(Choeronycteris, Eumops, Antrozous, Macrotus, Myotis, Nyctinomops)*, and other nocturnal or cryptic species. Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

Directed Field Survey for California Gnatcatcher

California Gnatcatcher *(Polioptila californica)*, a federally-listed Threatened Species, is known from habitat similar to that found on portions of the T&R Mini-Storage project site. Gnatcatchers occur in coastal and interior areas of coastal sage and related scrub habitats typically dominated by California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. Presence/absence field surveys for California Gnatcatcher were conducted by TeraCor biologist Samuel Reed in 2001 and again 2007. An updated gnatcatcher survey of the project development area, plus buffer, was completed by the Mrs. Church of RC Biological Consulting, Inc. in 2012.

No California Gnatcatchers were detected on the T&R Mini-Storage project site during any of the field surveys, including the 2012 survey of a portion of the site. For this reason, the site is considered "unoccupied" by this federally-listed Threatened Species.

Jurisdictional Wetlands and Waterways – Wetland Survey

Wetlands and "waters" are present on portions of the project site in association with various onsite drainages and tributaries. These areas of the site support hydrophytes, hydric soils, and/or wetlands hydrology.

A directed RPO wetland survey was completed as a part of the biology study of the original MUP project site. This resulted in the preparation of a Wetland Survey Report, which indicated that the original project would not impact any jurisdictional wetlands or "waters", including RPO wetlands. In examining the other drainages on Parcel "A" and in the ROW, the project civil engineer determined that these other onsite drainages current have no drainage function due to the impacts caused by the placement of Interstate 15 to the west to the property, which severed the natural hydrology and the flows to these swales. Access to Parcel "A" for dirt and rock disposal under the Parcel "A" alternative would result in impacts to the remnant drainage within the existing North Centre City Parkway right-of-way, which is proposed to be filled under the Parcel "A" alternative. Also impacted would be several remnant and non-functional drainages which cross the Parcel "A" site.

Other Unique Features/Resources

The T&R Mini-Storage project site does not support any regionally-unique land features. The native and naturalized habitats found on this site are not unique to this area, and the property does not support any unusual biological features.

The site provides foraging habitat for various locally common species of raptors and other carnivores. No wildlife nursery sites were detected although faunal reproduction clearly does take place onsite in many areas, including underground, in bird nests, etc. There is potential for large mammals to use the site, and Mule Deer *(Odocoileus hemionus)* scat was reported to have been observed. This is in addition to other, urban-tolerant species such as skunks, coyotes, raccoons, etc. The probability for Mountain Lion *(Felix concolor)* to use the site is considered low.

The project falls entirely within the "I-15 corridor", and area of known passage for species such as California

Gnatcatcher and others that move along the fragmented archipelago of CSS and other habitats from Escondido north to Riverside County. The T&R Mini-Storage project was redesigned to retain a functioning wildlife corridor that runs north-south within the property. The approved design provides a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the I-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement.

Significance of Project Impacts and Proposed Mitigation

The T&R Mini-Storage MUP project was subject to review under the California Environmental Quality Act (CEQA) and was required to provide compliance with the County's RPO and Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. This meant that the County required that project-related impacts to biological resources be "less than significant", as defined by CEQA, and that all RPO requirements and the Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources be met. This meant the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". All project-related impacts, as identified during the original CEQA analysis, were fully mitigated prior to the issuance of the MUP and approval of the project's Grading Permit. Because the Grading Permit is proposed for extension, additional impacts from the proposed materials disposal are anticipated. These are presented in Table 3.

Direct and Indirect Impacts

Development of the T&R Mini-Storage MUP project site as proposed resulted in a number of project-related direct and indirect impacts. Direct impacts resulted from the actual removal of habitat, plants, and animals from the site through brushing clearing and grading. These direct impacts are considered permanent because they result in a conversion of habitats to buildings, landscaped areas, roads, etc. Indirect impacts also affect plants, animals, and habitats that occur on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". The indirect impacts associated with site conversion are less quantifiable, due to the uncertainty associated with edge effects.

The following project-related impacts were identified with construction of the T&R Mini-Storage project. All of these impacts were mitigated as a part of the original MUP approvals and related permitting, reducing impacts to **less than significant**:

- 2.8 acres of CSS was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.9 acre of SMC was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.4 acre of NNG was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.1 acre of DH was impacted by development. The County of San Diego did not required mitigation for this loss pursuant to the "Guidelines for Determining Significance". The project impacted habitat

for at least fourteen Special States Species, including five Group 1 bird species and nine Group 2 species. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".

- The project as approved impacted a functioning wildlife corridor that runs north-south within the "I-15 corridor". Impacts to this corridor were considered **less than significant** because adequate corridor width (315' onsite plus 100' offsite) was maintained and open space was placed over the corridor area to preserve the biological resources within it in perpetuity.

Extension of the Grading Permit will result in additional project impacts, as follows:

<u>The use of Parcel "A" + access for dirt and rock disposal will impact the following habitats:</u>

- 4.7 acre of SMC. All of the CSS and NNG on Parcel "A" would be avoided by design at this time. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".

Cumulative Impacts

Cumulative impacts refer to a project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects (Public Resources Code § 21083; California Code of Regulations, Title 14, § 15064[h], 15065[c], 15130, and 15355). Cumulative impacts can occur when individually minor but collectively significant projects take place over time.

A list of past, present and future projects that could cumulatively contribute to the projects significant impacts was compiled based on the defined study area. The study area was determined based on several factors including land use, habitats, draft North County MSCP boundaries and species ranges. The general boundaries of this study area extend from the draft North County MSCP PAMA boundaries to the north adjacent to Tierra Libertia Road, the Escondido city limits to the south and west and the draft North County MSCP PAMA boundaries to the east, approximately half the distance to North Broadway. The list of cumulative projects within this study area is as follows:

AD 07-057	HARTMAN, AD, LOT CLEARING
MUP 99-007	DRAGOO WINERY
MUP 04-050	RANCHO VERONA, MUP, GROUP RESIDENTIAL
MUP 10-003	CORTEL MUP CELL SITE TMO SD6110, P10-003
MUP 10-027	DOUGHERTY PET RESORT/MUP 10-027
MUP 84-112-01	THUNDERBIRD GOLF DRIVING RANGE
MUP 84-112-02	PRACTICE PERFECT GOLF RANGE
ZAP 02-032	JESMOND DENE / SPRINT
ZAP 00-145	SPRINT SDG&E / SPRINT
ZAP 00-059	WILLIAMS COMMUNICATIONS
STP 01-034	MESA ROCK RESIDENCE SITE PLAN
STP 01-045	LANTIS SITE PLAN
STP 03-019	CRV ESCONDIDO 68 SITE PLAN
STP 03-020	MONTREUX MODEL HOME
STP 99-038	HERALD LANTIS
STP 04-025	SITE PLAN FOR SFD IN I-15 CORRIDOR

STP 05-030	MONTREUX
STP 07-041	HARTMAN/STP/EASY TURF STORAGE BLDG
STP 08-015	ADJ HOLDINGS, SITE PLAN I-15 REVIEW, S 0
TM 5114	MONTREUX TM
TPM 19895	STEPHENS 4 LOT SPLIT - TPM
TPM 20420	LANTIS TPM
TPM 20879	KNOX TENTATIVE PARCEL MAP
TPM 21192	RUA MICHELLE, TPM 21192

Cumulative projects within the geographic scope of analysis would have the potential to result in impacts to Special Status Species, including various plants and animals, including loss of habitat. Of the 24 cumulative projects analyzed, 17 were either withdrawn or determined not to result in impacts to biological resources. The remaining 7 cumulative projects have the potential to impact habitat and sensitive species through clearing, grading, grubbing, trenching, and other construction activities.

Extension of the Grading Permit would result in additional impacts, including impacts to SMC and potentially CSS and NNG. These vegetation types are relatively well distributed in San Diego County, although all are sensitive and depleted in many areas. Therefore, from a regional perspective, the relatively minor impacts to the above vegetation types, although adverse and significant, are not cumulatively considerable when viewed in connection with the substantial acreages these habitat types remaining in the San Diego County region.

Impacts to the above habitats will be mitigated for in kind, reducing impacts to a level below significance. Fourteen sensitive species were observed on the project site. Impacts to these species, although adverse and potentially significant, are not cumulatively considerable when viewed in connection with the substantial numbers of these species remaining in the San Diego County region.

Furthermore, the project falls entirely within the "I-15 corridor", an area of known passage for species such as California gnatcatcher and others that move along the fragmented archipelago of coastal sage scrub and other habitats from Escondido north to Riverside County. The project was designed to retain a functioning wildlife corridor that runs north-south within the property. The project provided a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the 1-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement. With the recordation of onsite open space over the existing wildlife corridor, the project resulted in a less than significant impact to wildlife movement and would not result in a cumulatively considerable impact to wildlife movement in the study area.

In summary, with the mitigation requirements for biological resources on this site, the project would not result in cumulatively considerable impacts on sensitive habitats, sensitive species or existing wildlife movement.

Proposed Mitigation

Extension of the Grading Permit to use Parcel "A" for dirt disposal will result in impacts to regulated habitats, and in order to satisfy the requirements of the County's "Guidelines for Determining Significance",

and current County policy for mitigating impacts to habitats, the following mitigation measures are recommended:

The project shall provide mitigation at a 1:1 ratio for impacts to up to 4.7 acre of SMC. This is equivalent to 4.7 acre of SMC. This may be satisfied onsite, as follows:

1. The original approval of the MUP and Grading Permit created an excess 11.0 acres of SMC beyond what was required to mitigate the original Grading Permit impacts (see Attachment A). At this time, it is recommended that you apply 4.7 acres of this 11.0-acre excess to offset impacts to 4.7 acres of SMC which would be impacted on Parcel "A" and the adjoining ROW. This again represents a 1:1 ratio for impacts to SMC on Parcel "A". This area is already within a dedicated Biological Open Space Easement, so no additional dedications would be required.

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Preparer and Persons/Organizations Contacted

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Certified Biological Consultant

Attachments

Figure 1. Regional Location
Figure 2. Aerial Photograph
Figure 3. Biological Resources
Figure 4. Biological Resources on Extended Grading Permit

Table 1. Field Surveys
Table 2 Flora and Fauna Detected
Table 3. Impact/Mitigation Analysis
Table 4. Sensitive Species Known from the Vicinity

Figure 1. Regional Location – T&R Mini-Storage Project Site
Portion of the U.S.G.S "Valley Center, California" 7.5′ Quadrangle

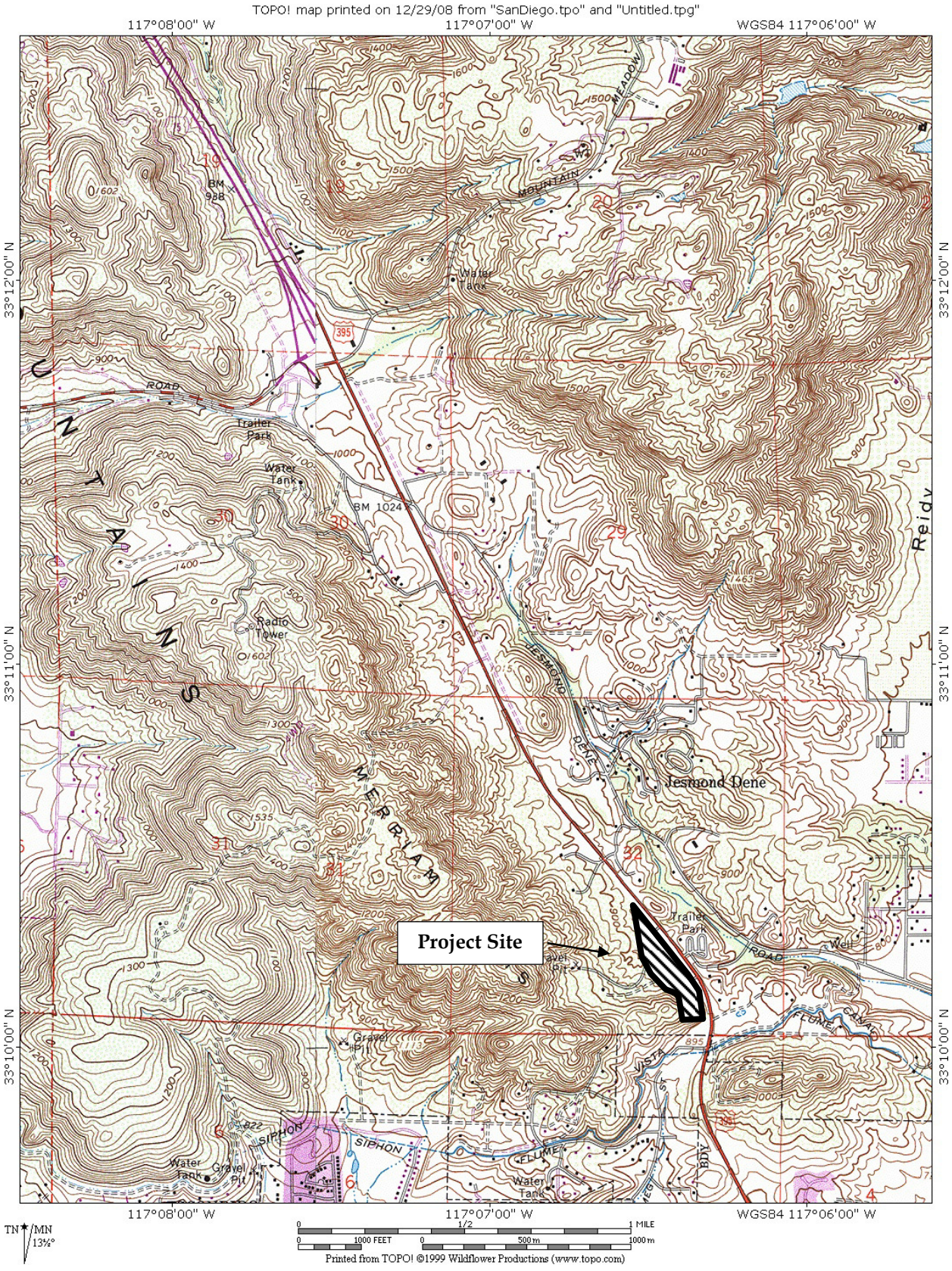

Figure 2. Aerial Photograph – T&R Mini-Storage Project Site

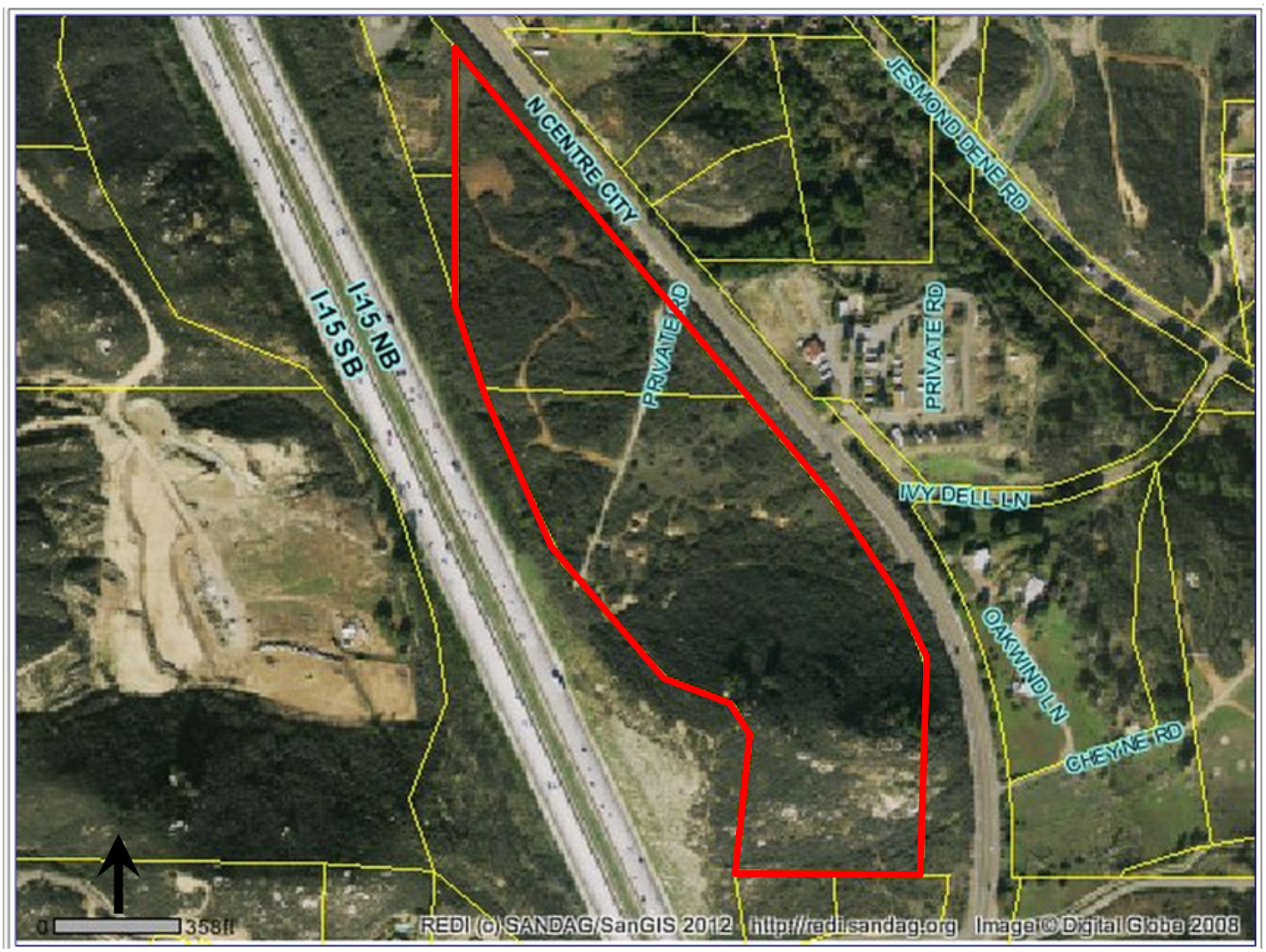

Figure 3. Biological Resources – T&R Mini-Storage Project Site

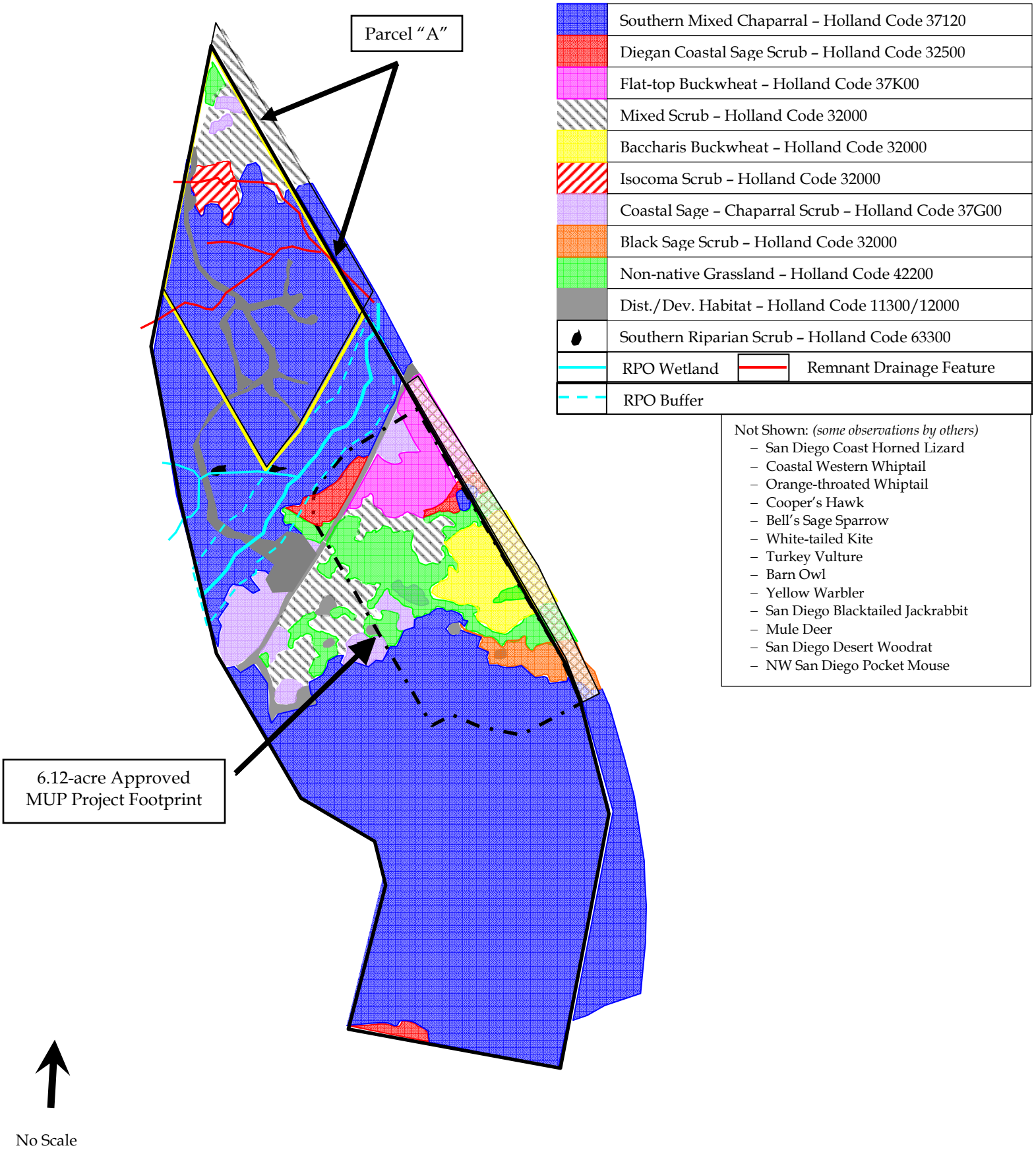

Figure 4. Biological Resources on Extended Grading Permit (Parcel "A")

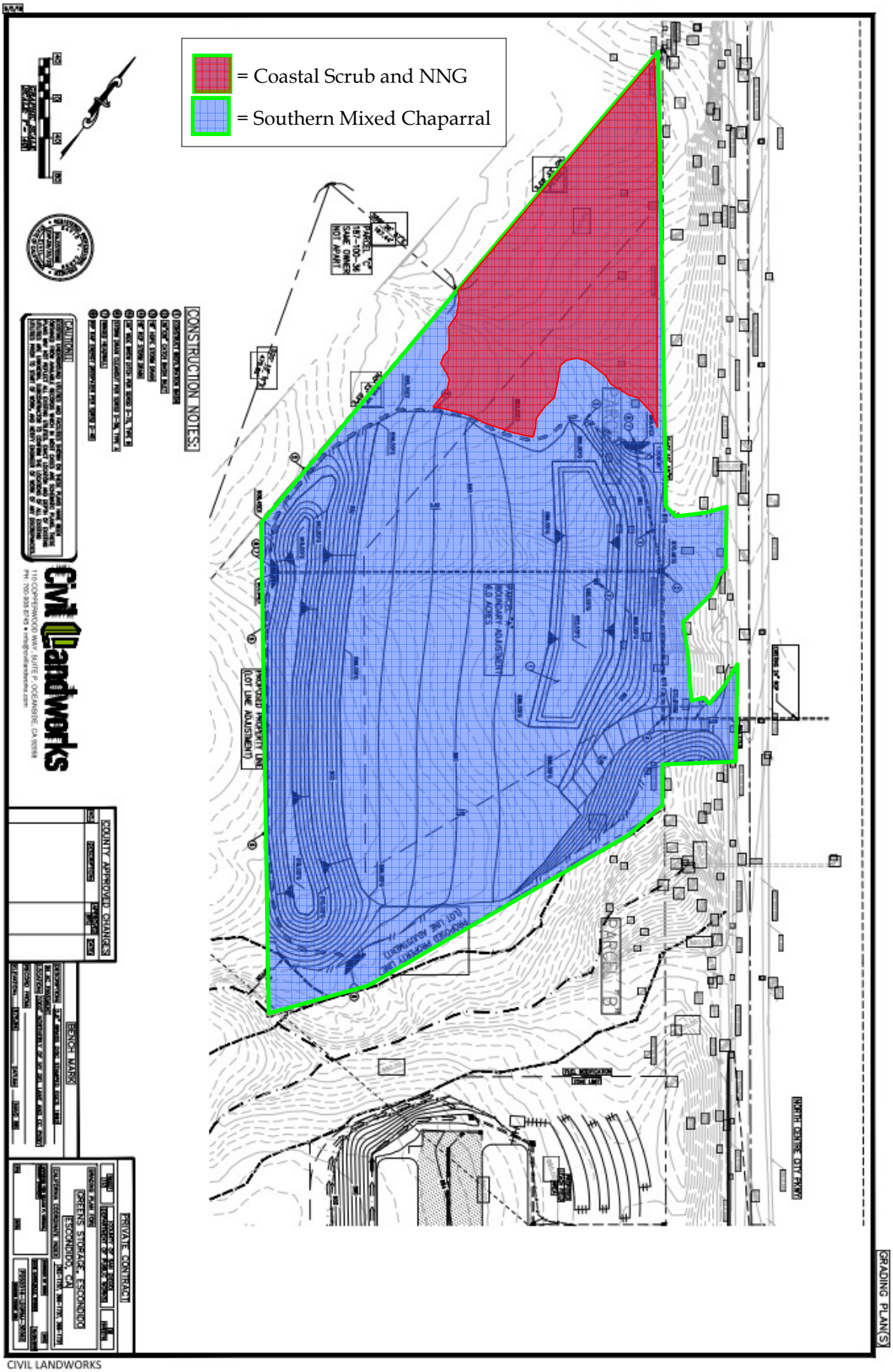

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
05 Mar 2001	SR	n/a[1]	Quino	n/a
16 Mar 2001	SR	n/a	Quino	n/a
24 Mar 2001	SR	n/a	Gnatcatcher	n/a
25 Mar 2001	SR	n/a	Quino	n/a
31 Mar 2001	SR	n/a	Gnatcatcher	n/a
03 Apr 2001	SR	n/a	Quino	n/a
13 Apr 2001	SR	n/a	Gnatcatcher + Quino	n/a
06 Dec 2002	SR	n/a	General	n/a
15 Jan 2003	SR, WM	n/a	General + Mapping	n/a
20 Jan 2003	SR, WM	n/a	General + Mapping	n/a
23 Jan 2003	SR, WM	n/a	General + Mapping	n/a
26 Jan 2003	SR, WM	n/a	General + Mapping	n/a
10 Mar 2003	SR ?	n/a	Wetlands	n/a
01 Apr 2003	SR ?	n/a	Wetlands	n/a
08 May 2003	SR	n/a	Floral	n/a

[1] *n/a – data not available*

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
30 Mar 2007	SR ?	n/a	Gnatcatcher	n/a
07 Apr 2007	SR	n/a	Gnatcatcher	n/a
15 Apr 2007	SR ?	n/a	Gnatcatcher	n/a
18 Apr 2007	PV	n/a	Kangaroo Rat	n/a
19 Apr 2007	PV	n/a	Kangaroo Rat	n/a
20 Apr 2007	PV	n/a	Kangaroo Rat	n/a
22 Apr 2007	PV	n/a	Kangaroo Rat	n/a
23 Apr 2007	PV	n/a	Kangaroo Rat	n/a
24 Apr 2007	PV	n/a	Kangaroo Rat	n/a
02 May 2007	SR ?	n/a	Gnatcatcher	n/a
15 May 2007	SR ?	n/a	Gnatcatcher	n/a
22 May 2007	SR ?	n/a	Gnatcatcher	n/a
27 Sep 2011	VS	10:00-12:45	General	Clear skies, temps in the high 70°s to low 90°s, no wind
12 Oct 2011	VS	08:45-12:30	General + Mapping	Clear skies, temps in the low 80°s to high 90°s, no wind
06 Jan 2012	VS	08:45-12:30	General + Wetlands	Clear skies, temps in the low 60°s, no wind
31 May 2019	VS, BM	09:00-02:30	Parcel "A + Access	Clear skies, temps in the mid 70°s, no wind

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants	
Acmispon glaber	Deerweed
Acourtia microcephala	Sacapellote
Adenostoma fasciculatum	Chamise
Ailanthus altissima *	Tree Of Heaven
Amsinckia sp.	Fiddleneck
Antirrhinum nuttallianum	Nuttall's Snapdragon
Artemisia californica	California Sagebrush
Artemisia douglasiana	Mugwort
Asclepias fascicularis	Narrowleaf Milkweed
*Avena barbata**	Slender Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis salicifolia	Mule Fat
Baccharis sarothroides	Broom Baccharis
Brassica nigra *	Black Mustard
Brickellia californica	Bricklebush
Bromus diandrus *	Ripgut Brome
Bromus hordeaceus *	Common Soft-Brome
Bromus rubens *	Red Brome
Calystegia macrostegia	Morning-Glory
Camissonia hirtella	Evening Primrose
Camissoniopsis bistorta	California Sun Cup
Capsella bursa-pastoris	Shepherd's Purse
Carduus pycnocephalus *	Italian Thistle
Carex triquetra	Trigonous Sedge
Castilleja densiflora	Parish's Owl's-Clover
Ceanothus tomentosus	Woollyleaf Ceanothus
Centaurea melitensis *	Tocalote
Cercocarpus minutifolius	San Diego Mountain-Mahogany
Chaenactis glabriuscula	Glabriuscula
Cirsium occidentale	Cobwebby Thistle
Claytonia parviflora	Narrow-Leaved Miner's Lettuce
Clematis pauciflora	Rope-Vine
Conium maculatum *	Poison Hemlock
Cordylanthus rigidus	Stiffbranch Bird's Beak
Corethrogyne filaginifolia var. virgata	Common Sand Aster
Crassula connata	Pygmy-Weed
Cryptantha intermedia	Common Cryptantha
Cuscuta californica	California Dodder
Cyperus sp.	Sedge
Daucus pusillus	American Wild Carrot
Deinandra fasciculata	Clustered Tarweed
Dicentra chrysantha	Golden Eardrops
Dichelostemma pulchellum	Blue Dicks
Diplacus x australis	San Diego Monkeyflower
Dudleya pulverulenta	Chalk Live-Forever
Encelia farinosa *	Brittle Bush
Eriastrum filifolium	Lavender Woollystar
Eriogonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
*Erodium cicutarium**	Filaree

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Erythranthe guttata	Seep Monkeyflower
Eucrypta chrysanthemifolia	Common Eucrypta
*Euphorbia peplus**	Petty Spurge
Foeniculum vulgare	Fennel
Galium sp.	Bedstraw
Hazardia squarrosa	Saw-Toothed Goldenbush
Helianthemum scoparium	Peak Rush-Rose
Helianthus gracilentus	Sunflower
Heteromeles arbutifloia	Toyon
*Hirschfeldia incana**	Perennial Mustard
*Hordeum sp.**	Wild Barley
*Hypochaeris glabra **	Smooth Cat's Ear
Isocoma menziesii	Goldenbush
Keckiella antirrhinoides	Chaparral Beardtongue
Keckiella cordifolia	Climbing Bush Penstemon
*Lamarckia aurea**	Goldentop
Lepidium nitidum var. nitidum	Shining Peppergrass
Leymus condensatus	Giant Wild Rye
Linaria canadensis	Blue Toadflax
*Lobularia maritima **	Sweet Alyssum
*Logfia filaginoides**	California Cottonrose
*Logfia gallica **	Narrowleaf Cottonrose
Lonicera subspicata	Southern Honeysuckle
Lotus scoparius	Deer Weed
Lupinus bicolor	Miniature Lupine
Lupinus sp.	Lupine
Lysimachia arvensis	Scarlet Pimpernel
Malacothamnus fasciculatus	Bushmallow
Malosma laurina	Laurel Sumac
*Malva parviflora**	Cheese Weed
Marah marcocarpus	Wild Cucumber
*Marrubium vulgare**	Horehound
Mimulus guttatus	Monkey Flower
Mirabilis sp.	Wishbone Bush
Muhlenbergia rigens	Deer Grass
Muhlenbergia sp.	Muhly
Nassella lepida	Foothill Needle Grass
Nassella pulchra	Purple Needle-Grass
Navarretia hamata	Hooked Navarretia
Nicotiana glauca	Tree Tobacco
*Olea europa **	European Olive
Oxalis micrantha	Dwarf Woodsorrel
Paeonia californica	California Peony
Pectocarya penicillata	Pectocarya
Penstemon spectabilis	Showy Penstemon
Pentagramma triangularis	Goldback Fern
Phacelia cicutaria	Caterpillar Phacelia
Phacelia grandiflora	Big-Flower Phacelia
Phacelia minor	Canterbury Bells
Phacelia parryi	Parry Phacelia
Phacelia ramosissima	Scorpionweeds
Phacelia sp.	Phacelia

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Phoenix canariensis *	Canary Island Palm
Pityrogramma triangularis var. *triangularis*	Goldenback Fern
Polycarpon tetraphyllum	Fourleaf Manyseed
Polypodium californicum	California Polypody
Prunus ilicifolia	Holly-Leafed Cherry
Pseudognaphalium beneolens	Fragrant Everlasting
Pseudognaphalium bolettii	Bicolored Cudweed
Pseudognaphalium californicum	California Cudweed
Pseudognaphalium stramineum *	Cudweed
Pterostegia drymarioides	Fairy Mist
Quercus x acutidens	Torrey's Hybrid Oak
Quercus agrifolia	Coast Live Oak
Quercus berberidifolia	Scrub Oak
Rhamnus crocea	Spiny Redberry
Rhamnus ilicifolia	Holly-Leaf Redberry
Rhus aromatica	Fragrant Sumac
Rhus integrifolia	Lemonadeberry
Rhus ovata	Sugar Bush
Ribes indecorum	White Flowering Currant
Salix lasiolepis	Arroyo Willow
Salvia apiana	White Sage
Salvia mellifera	Black Sage
Sambucus cerulea	Blue Elder
Sanicula crassicaulis	Sanicula
Schismus barbatus *	Mediterranean Grass
Scrophularia californica	California Bee Plant
Selaginella sp.	Spike-Moss
Sisyrinchium bellum	Blue-Eyed Grass
Solanum americanum *	Nightshade
Solanum parishii	Parish's Nightshade
Sonchus asper *	Prickly Sowthistle
Stephanomeria exigua	Small Wire-Lettuce
Stylocline gnaphaloides	Everlasting Neststraw
Thysanocarpus sp.	Lacepod
Toxicodendron diversilobum	Poison Oak
Triodanis biflora	Venus' Looking-Glass
Vulpia myuros *	Rat's-Tail Fescue
Xylococcus bicolor	Mission Manzanita
Yucca whipplei	Foothill Yucca
Zeltnera venusta	California Centaury

Birds

Accipiter cooperii	**Cooper's Hawk**
Amphispiza belli belli	**Sage Sparrow**
Aphelocoma coerulescens	Scrub Jay
Archilochus alexandri	Black-Chinned Hummingbird
Baeolophus inornatus	Oak Titmouse
Buteo jamaicensis	Red-Tailed Hawk
Buteo lineatus	**Red-Shouldered Hawk**
Callipepla californicus	California Quail
Calypte anna	Anna's Hummingbird

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Carduelis psaltria	Lesser Goldfinch
Carduelis tristis	American Goldfinch
Carpodacus mexicanus	House Finch
Cathartes aura	**Turkey Vulture**
Chamaea fasciata	Wrentit
Colaptes auratus	Northern Flicker
Columba livia *	Rock Dove
Corvus brachyrhynchos	American Crow
Corvus corax	Common Raven
Dendroica coronata	Audubon's Warbler
Dendroica coronata	Yellow-Rumped Warbler
Dendroica petechia	**Yellow Warbler**
Elanus leucurus	**White-Tailed Kite**
Euphagus cyanocephalus	Brewer's blackbird
Falco sparverius	American kestrel
Geococcyx californicus	Greater Roadrunner
Guiraca caerulea	Blue Grosbeak
Icterus bullockii	Bullock's Oriole
Melospiza melodia	Song Sparrow
Mimus polyglottos	Northern Mockingbird
*Passer domesticus**	House Sparrow
Picoides pubescens	Downy Woodpecker
Pipilo crissalis	California Towhee
Pipilo erythrophthalmus	Spotted Towhee
Polioptila caerulea	Blue-Gray Gnatcatcher
Psaltriparus minimus	Bushtit
Sayornis nigricans	Black Phoebe
Sitta carolinensis	White-Breasted Nuthatch
Stelgidopteryx seripennis	Northern Rough-Winged Swallow
*Sturnus vulgaris *	European Starling
Thryomanes bewickii	Bewick's Wren
Toxostoma redivivum	California Thrasher
Trogoldytes aedon	House Wren
Tyrannus verticalis	Western Kingbird
Tyto alba	**Barn Owl**
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-Crowned Sparrow

Mammals

Canis latrans	Coyote
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse
Dipodomys agilis	Pacific Kangaroo Rat
Lepus californicus bennettii	**San Diego Black-tailed Jackrabbit**
Neotoma lepida	**San Diego Desert Woodrat**
Odocoilus hemionus	**Mule Deer**
Peromyscus maniculatis	Deer Mouse
Procyon lotor	Raccoon
Spermophilus beecheyi	California Ground Squirrel
Sylvilagus audubonii	Desert Cottontail

Amphibians and Reptiles

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Batrachoseps major	Garden Salamander
Bufo boreas	Western Toad
Cnemidophorus tigris multiscutatus	**Coastal Western Whiptail**
Cnemidophorus hyperythrus beldingi	**Orange-throated Whiptail**
Lampropeltis californiae	California King Snake
Phrynosoma coronatum blainvillei	**San Diego Horned Lizard**
Pseudacris regilla	Pacific Chorus Frog
Sceloporus occidentalis	Western Fence Lizard
Uta stansburiana	Side-Blotched Lizard

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* – non-native taxon
bold – sensitive taxon

Table 3. Habitat Impact/Mitigation Analysis – T&R Mini-Storage Grading Permit Extension Project

Parcel "A" + Access Impact/Mitigation Analysis				
Biological Resource	Total	Impacted	Impact Neutral	Mitigation Required
SMC	4.9 acres	4.7 acres	n/a	4.7 acres @ 1:1
CSS	1.5 acres	none	n/a	avoidance
NNG	0.1 acre	none	n/a	avoidance
Total	**6.5 acres**			**4.7 acres in BOSE[2]**

[2] *Represents utilization of 4.7 acres of 11.0 acres of SMC already in dedicated Biological Open Space Easement*

Table 4. Sensitive Species Known from the Vicinity – T&R Mini-Storage Project Site

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Arctostaphylos rainbowensis	Rainbow Manzanita					A		X																	L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A			X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D		X				X													L	1a
Harpagonella palmeri	Palmer's Grappling Hook					D	X		X			X													L	1a
Horkelia truncata	Ramona Horkelia					A		X																	L	1a
Monardella hypoleuca lanata	Felt Leaved Rock Mint					A		X				X													L	1a
Nolina cismontana	Chaparral Beargrass					A		X				X													L	1b
Piperia leptopetala	Narrow-Petaled Rein Orchid					D		X			X	X	X												M	2b
Polygala cornuta fishiae	Fish's Milkwort					D		X				X													L	2b
Satureja chandleri	San Miguel Savory					A		X				X													L	1a
Senecio ganderi	Gander's Butterweed			X		A		X				X													L	1a
Tetracoccus dioicus	Parry's Tetracoccus					A		X				X													L	1b
Accipiter cooperi	Cooper's Hawk						X	X	X	X	X	X	X	X							X				O	--
Accipiter striatus	Sharp-Shinned Hawk						X	X		X	X	X	X	X											M	2a
Agelaius tricolor	Tricolored Blackbird								X	X						X								X	L	1a
Aimophila ruficep canescens	Rufous-Crowned Sparrow						X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow								X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow						X	X				X													O	--
Anniella pulchra pulchra	Silvery Legless Lizard						X		X	X												X			M	2a
Antrozous pallidus	Pallid Bat						X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle				X		X	X	X		X	X	X	X	X										L	1c
Bassariscus astutus	Ringtail							X		X	X	X													L	1a
Buteo lineatus	Red-Shouldered Hawk						X	X	X	X	X	X	X	X											O	--
Cathartes aura	Turkey Vulture						X	X	X	X	X	X	X	X											O	--
Chaetodipus c. femoralis	Dulzura CA Pocket Mouse						X	X	X		X	X	X												M	2a
Chaetodipus fallax fallax	NW San Diego Pocket Mouse						X	X	X			X					X	X							O	--
Charina trivirgata roseofusca	Coastal Rosy Boa						X	X			X	X													M	2a
Circus cyaneus hudsonius	Northern Harrier						X		X							X			X					X	M	2a
Cnemidophorus hyperythrus	Orange-Throated Whiptail						X	X	X	X		X													O	--
Cnemidophorus t. multiscutatus	Coastal Western Whiptail							X		X	X	X													O	--
Coleonyx variegatus abbotti	SD Banded Gecko						X		X			X													L	1a
Corynorhinus townsendii	Townsend's Bigeared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	N. Red Diamond Rattlesnake						X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				H	3a
Dendroica petechia brewsteri	Yellow Warbler						X	X		X	X	X	X	X											O	--
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											H	3a
Dipodomys stephensi	Stephen's Kangaroo Rat	X	X				X		X																L	1a
Elanus leucurus	White-tailed Kite								X	X															O	--
Eremophila alpestris actis	Horned Lark								X												X				M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Larus californicus	California Gull (Non-Breeding)								X							X			X		X	X	X		L	1a
Lepus californicus bennettii	San Diego Black-tailed Jackrabbit						X	X	X		X	X	X	X											O	--
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X	X	M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X	X		X	X	X	X	X	X									O	--

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
Perognathus longimembris brevinasus	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
Tyto alba	Barn Owl						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	O	--

Probability of Occurrence Codes:
L – Low Probability; rare species in area. Most of these species occur on habitat not found on the project site, including vernal pools, coastal dunes, etc. California Red-legged Frogs and Yellow-billed Cuckoo are two examples of species that fit into this category. Both are extremely rare in California.
M – Moderate Probability. Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the subject property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite
H – High Probability. Most of these species are expected to use the project site, but are difficult to reliably detect. Examples include fossorial reptiles and amphibians, wide-ranging birds, etc.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)
1c – obvious species that would have been seen or otherwise detected if present (animal)
2a - could possibly occur onsite on at least an occasional basis, based on habitat quality (animal)
2b - could occur onsite, but very rare, and/or species poorly known to science (plant)
3a - nearly certain to occur onsite on a regular basis, but cryptic, seasonal, or otherwise difficult to detect (animal)
3b – cryptic or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plant)

Attachment A

Memorandum on Mitigation dated 29 August 2019

VINCENT N. SCHEIDT

Biological Consultant

3158 Occidental Street • San Diego, CA • 92122-3205 • 858-457-3873 • 858-336-7106 cell • email: vince.scheidt@gmail.com

Memorandum

To: Dr. Raj Kadakia

From: Vince Scheidt, Consulting Biologist

Date: August 29, 2019

RE: Comments on Mitigation; Escondido Mini-Storage Project, PDS2005-3910-0508031

Per your request, I have evaluated the acreage of Southern Mixed Chaparral (SMC) within the open space easement area on the subject project site. According to my 2013 biology report, the original project required 1.9 acres of SMC to be preserved onsite in open space in order to fully mitigate impacts to SMC. The open space easement you dedicated supports 12.9 acres of SMC, which is 11.0 acres of SMC in excess of the requirement. The biology report acknowledges this, stating further that the... "Excess acreage can be preserved onsite to protect the ecosystem functioning of the onsite wildlife corridor". It does not address the specific mitigation ratio other than saying that the mitigation requirement at 1:1 is 1.9 acres.

At this point, you wish to apply some of the excess 11.0 acres of SMC to alleviate the problem with dirt disposal associated with your project currently under development. To that end, you would apply 5.5 acres of the excess 11.0 acres to mitigate impacts to 5.5 acres of SMC currently present on the 6-acre parcel that was created concurrent with your use permit. This again represents a 1:1 ratio for impacts to SMC currently present on the 6-acre parcel.

The 6-acre parcel also supports approximately 1.5 acres of Coastal Scrub (CSS). Because impacts to this habitat-type are fully regulated in concurrence with the Wildlife Agencies, I recommend that you fence and avoid the CSS entirely until such time as you wish to pursue a Habitat Loss Permit (HLP) to cover the loss. This is a small patch of vegetation of low biological resource value that you may wish to remove at some time in the future. By not impacting this CSS habitat at this time, you can avoid a need for the HLP until such time as you decide to go forward.

The issue of wetlands/waters on the 6-acre parcel has been addressed by the project's Civil Engineer. He demonstrated that the drainages on the northern end of the 6-acre parcel were hydrologically cut-off from their drainage basins by construction of Interstate Highway 15 many decades ago. These features apparently no longer receive flow from the surrounding basin but remain as incised erosional features. None of these areas qualify as County Resource Protection Ordinance (RPO) wetlands.

Please let me know if you have questions.

VINCENT N. SCHEIDT

Biological Consultant

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~ UPDATED ~
SUMMARY BIOLOGY REPORT

Biological Resources, Project Impacts, and Mitigation

T&R MINI STORAGE MAJOR USE PERMIT & EXTENDED GRADING PERMIT
PDS2005-3300-05-052 & PDS2008-3710-08-0044
ENVIRONMENTAL LOG NO.: PDS2005-3910-0508031
APN 187-170-48 and -49
County of San Diego

Updated October 2019

Summary

The T&R Mini-Storage Major Use Permit project site consists of 31.7 acres of partially-cleared land (APN 187-170-48-00 and APN 187-170-49-00) located at between I-15 and North Centre City Parkway in the Escondido area of unincorporated San Diego County, California. The approved project included a Major Use Permit (MUP), a Grading Permit, and a boundary adjustment that created a new 6.0-acre parcel (Parcel "A") from the original property acreage. This 6.0-acre area is now being examined as part of an extended Grading Permit. Habitats onsite and surrounding the property include chaparral, scrubs, non-native grassland, disturbed/developed, and riparian. The approved project removed approximately 6.12 acres of chaparral, scrub, non-native grassland, and disturbed/developed habitat as a part of site development. These original impacts were mitigated by onsite open space dedication and offsite mitigation credit purchase.

At this time, the approved Grading Permit is proposed to be extended to allow the disposal of approximately 65,000 cubic yards of soil and rock materials from the original MUP site (Parcel "B") onto a portion of the 6.0-acre Parcel "A" (Figure 4). Parcel "A" supports native vegetation, including scrub and chaparral.

Introduction, Project Description, Location, and Setting

The Updated T&R Mini-Storage project consists of an extension of an approved Grading Permit that allows the development of a commercial storage facility on approximately 6.12 acres of the APN 187-170-48-00 and APN 187-170-49-00 site (Parcel "B"). An approximately 6.0-acre parcel (Parcel "A"), which was created as part of the MUP process, is now being proposed for dirt and rock disposal from the approved construction area. Parcel "A" is currently in a natural state other than areas that were cleared for geotechnical exploration years ago and which are regrowing with natives at this time.

The extended Grading Permit will impact a total of 4.68 gross acres (rounded to 4.7 acres, per County requirements) of 6.0-acre Parcel "A" including an adjacent portion of the North Centre City Parkway right-of-

way for ingress (see Figure 4). This disposal will require that the material to be exported from the construction area, loaded onto transportation vehicles, driven up North Centre City Parkway before entering a temporary haul route onto to Parcel "A" for proper placement. The temporary haul route would include the placement of material from the Mini-Storage project MUP site within the remnant drainage within the right-of-way to allow access from North Centre City Parkway to Parcel "A" (Figure 4). The use of North Centre City Parkway requires a Traffic Control Plan to allow the travel along the southbound lane of North Centre City Parkway. This is presented in Attachment B.

A back-up alternative to the access off North Centre City Parkway would be through the use of a large, 36" wide by 130' long telescoping conveyer belt system (SuperStacker ® Model KPI/JCI 36130) which would be placed on the south side of the existing open space and extended to span the entire open space, placing the dirt within the 4.7-acre disposal area within Parcel "A" (see example in Figure 6). During site construction, excavated material would be stockpiled on the northern limits of the Mini-Storage project development area. A loader would supply the conveyer belt with moistened soil, which will then be transferred by a closed tube conveyer system to Parcel "A", where a second loader would distribute the material on the site (Figure 5). The SuperStacker ® Model KPI/JCI 36130 conveyer system is capable of moving 1,000 tons of material per hour which means that this work would take approximately 13 days to complete. This assumes the transfer of approximately 97,500 tons (65,000 cubic yards) of material. Prior to soil placement, silt fencing and limits-of-work (habitat protection) fencing will be installed on Parcel "A", including a temporary fence between the CSS and the chaparral areas. No soil will be placed in the CSS area as part of this application. After placement, standard erosion control methods will be applied to all slopes on Parcel "A".

The location of the project site is west of North Centre City Parkway and east of Interstate Highway 15 in the Escondido area of unincorporated San Diego County (Figure 1). Various forms of chaparral, scrub, grassland, disturbed/developed, and riparian are the only plant communities (habitats) found onsite, with these same habitats also present offsite (Figure 3).

Biological field surveys of the T&R Mini-Storage MUP project site have been completed by various investigators since at least 2002, including Samuel Reed (SR), W. McTeer (WM), Philippe Vergne (PV), Mrs. Church (RC), and most recently Vincent Scheidt (VS) and Brandon Myers (BM). Survey data (dates, personnel, hours, study focus, and weather conditions) are presented in Table 1. Older biology reports for this property have been prepared by TeraCor (2003) and Helix Environmental (2009). Data from those older documents have been incorporated, where applicable, into this report.

The purpose of the most current field survey was to update the site's flora and fauna (Table 2), potential impacts associated with the Grading Permit extension (Table 3), and any associated new mitigation requirements. A second purpose was to verify the presence/absence of jurisdictional lands and various special status plant and animal species which are known to occur in the general vicinity of this property and specifically in association with the Parcel "A" (Table 4).

Habitats/Vegetation Communities

The T&R Mini-Storage project site supports a diversity of native and non-native, naturalized vegetation types. The central section of the site, where development is underway, supports various scrubs and other successional plant associations that have developed on old disturbed areas. The balance of the site is more-or-less natural. The habitats associated with the original 31.7-acre MUP site include the following:

Southern Mixed Chaparral (Holland Code 37120) – 20.9 acres total, 4.9 acres on Parcel "A" + access
Southern Mixed Chaparral (SMC) vegetation covers the vast majority of the project site. This dense and impenetrable habitat is dominated by large, hard-woody shrubs, such as Chamise *(Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), and San Diego Mountain Mahogany *(Cercocarpus minutifolius)*. SMC is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Coastal Scrub (Holland Code 32000) – 6.9 acres total, 1.5 acres on Parcel "A"
Coastal Scrub (CSS) vegetation is found in the central and northern portions of the project site. This habitat-type can be subdivided into various subcategories, including Diegan Coastal Sage Scrub (Holland Code 32500), Flat-top Buckwheat (Holland Code 37K00), Mixed Scrub (Holland Code 32000), Baccharis Buckwheat (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Black Sage Scrub (Holland Code 32000). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For analysis purposes in this report, all of the various coastal scrub variants are considered CSS. An ecotonal habitat expression; Coastal Sage – Chaparral Scrub (Holland Code 37G00) is found on portions of the site, mostly between the CSS and the SMC proper. Soft-woody shrubs are present in the Coastal Sage – Chaparral Scrub, although these do not dominate the vegetation. Nevertheless, this is considered a form of CSS for analysis purposes in this report. CSS is a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The biological value of this habitat-type is moderate.

Non-native Grassland (Holland Code 42200) – 3.2 acres total, 0.1 acre on Parcel "A"
Non-native Grassland (NNG) vegetation is found in the central area of the project site with a tiny patch on the northern property edge. This habitat is indicated by weedy annual Eurasian grasses, including Ripgut Brome *(Bromus diandrus),* Slender Wild Oat *(Avena barbata),* and many others. Native elements in the habitat include Slender-leaved Milkweed (*Asclepias fasciculatus*), Miniature Lupine *(Lupinus bicolor)*, Common Sand Aster (*Corethrogyne filaginifolia* var. *virgata*), and Fasciculated Tarplant *(Hemizonia fasciculata)*. NNG has the potential to be a sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. This is because the County considers NNG to be significant raptor foraging habitat. The biological resource value of this habitat-type is low to moderate.

Southern Riparian Scrub (Holland Code 63300) – 0.03 acre, 0.0 acres on Parcel "A"
Southern Riparian Scrub (SRS) is found in a few tiny patches within the site's drainages. This habitat is indicated by Mule Fat *(Baccharis salicifolia)* and Arroyo Willow *(Salix lasiolepis)*. The surrounding vegetation consists of very dense SMC. SRS is a sensitive habitat-type in San Diego County, as defined by Guidelines for Determining Significance. The biological resource value of this habitat-type is moderate to high.

Disturbed/Developed Habitat (Holland Code 11300/12000) – 0.7 acre, 0.0 acre on Parcel "A"
The central section of the property supports a paved road and several laterals that qualify as Disturbed/Developed Habitat (DH). These areas support either no vegetation (bare dirt, pavement) or only sparse ruderal weeds such as Perennial Mustard (*Hirschfeldia incana)* and Tocalote *(Centaurea melitensis).* DH is a non-sensitive habitat-type in San Diego County, as defined by the Guidelines for Determining Significance. The areas mapped as DH have no biological value.

Flora and Fauna

One hundred and forty-seven species of vascular plants and sixty-five species of animals were detected during the various field surveys of the property. These are listed in Table 2. This list represents a characteristic flora and fauna associated with this part of San Diego County in association with habitats similar to those found onsite.

Special Status Species

Special Status (or "sensitive") Species are those plants and animals listed as "Rare", "Threatened", "Endangered", "of Special Concern", or otherwise noteworthy by the County of San Diego, the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), the California Native Plant Society (CNPS), or other governmental or conservation agencies.

No sensitive plant species were observed during any of the surveys. A variety of sensitive plants are known from the general vicinity of the property, however. Most of these are either associated with habitats not found here (such as native grasslands, mafic chaparral, or vernal pools) or are large and distinctive perennials that would not have been missed if encountered onsite. Sensitive plants known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

The following fourteen sensitive animal species were observed on the T&R Mini-Storage MUP site during the various field surveys, with one additional species (Orange-throated Whiptail) detected during the most recent (2019) survey:

San Diego Coast Horned Lizard *(Phrynosoma coronatum blainvillei)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Northern California though coastal southern California into northern Baja California
Habitat: Open areas of scrub, chaparral and grassland in the presence of native harvester ant *(Pogonomyrmex* sp.*)*, which is the primary prey item for this lizard.
Status on site: A single individual was observed by others in the central portion of the site.

Coastal Western Whiptail *(Cnemidophorus tigris multiscutatus)*
Listing: State status: none
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)
Distribution: Cismontane areas of southern California south into Baja California Norte, Mexico
Habitat: Mainly inhabits coastal sage scrub and chaparral where it occurs in areas of friable soils on hillsides and in canyons but also may be found in open, dry riparian areas..
Status on site: Three individuals were observed by others in central portion of the site.

Orange-throated Whiptail *(Cnemidophorus hyperythrus beldingi)*
Listing: State status: "Species of Special Concern" (CDFW, 2019)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Distribution: Extreme southwestern California; from Orange and Riverside Counties south into northern Baja California.
Habitat(s): Inhabits coastal sage scrub, chaparral and areas of open brush with loose soils. May also be found in open, dry riparian areas. Sea level to about 1,800 feet MSL, occasionally higher on hot, south-facing slopes**.**
Status on site: A single individual was observed near the center of Parcel "A".

Cooper's Hawk *(Accipiter cooperii)*
Listing: "Species of Local Concern" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Watch List" (CDFW, 2009)
Distribution: Occurs throughout most of North America, from northern Mexico to southern Canada
Habitat: Inhabits a variety of woodlands, including oak woodlands, riparian and coniferous forests
Status on site: Single specimen observed on Parcel "A" during 2019 survey.

Bell's Sage Sparrow *(Amphispiza belli belli)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
Distribution: Cismontane areas of southern California and northern Baja California, Mexico. Also found on the west slopes of the Sierra Nevada Mountains
Habitat: Coastal Sage Scrub and chaparral. May also occur in other habitats such as juniper woodland and alluvial fan scrub
Status on site: Observed by others in sage scrub in two locations in the central portion of the site.

Red-shouldered Hawk *(Buteo lineatus)*
Listing: "Blue List" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Occurs over large areas of central and southern California west of the Sierras. Also occurs in Mexico, southeastern Canada, and the eastern United States.
Habitat: Roost and nest in a variety of woodland habitats: eucalyptus woodlands, oak groves, open riparian forests, and related broken wooded areas.
Status on Site: Single specimen was seen flying over the northern portion of the site

Turkey Vulture *(Cathartes aura)*
Listing: "Blue-list" (Tate, 1986)
"Declining" (Unitt, 1984)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: none
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: Ranges from southern Canada to Argentina
Habitat: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.
Status on site: Several specimens were observed soaring overhead.

Barn Owl *(Tyto alba)*
Listing: "Blue-list" (Tate, 1986)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal/State status: none
Distribution: Nearly worldwide in tropical and temperate regions
Habitat: In southern California, Barn Owls range and forage widely, nesting in many types of open cavities. Specimens roost in areas of thick vegetation or in buildings (hence the common name).
Status on site: Observed by others in the northern portion of the site.

Yellow Warbler *(Dendroica petechia brewsteri)*

Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Nesting typically occurs in willow-dominated riparian areas from Canada to northern Mexico. Specimens overwinter in the area from Mexico south to South America. Yellow Warblers are found throughout San Diego County.
Habitat: Yellow Warblers breed during the summer in moist wooded habitats; however, they can be found most everywhere during migration. In San Diego County they are typically found in riparian thickets.
Status on site: Migratory specimens observed by others flying through the site during migration.

San Diego Black-tailed Jackrabbit *(Lepus californicus bennettii)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Cismontane and transmontane areas of southern California and adjacent areas of northern Baja California, Mexico
Habitat: Associated with areas of open chaparral, scrub, and grassland vegetation
Status on Site: Several observations made by others during the site surveys.

Mule Deer *(Odocoileus hemionus)*
Listing: State status: Regulated Game Animal (CDFW, 2012)
County status: San Diego County Sensitive Animal List (DPLU, 2010), Group 2; "MSCP Indicator" (DPLU, 1993)
Federal status: none
Distribution: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)
Habitat: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats; occasionally by sightings of specimens themselves
Status on site: Scat from this species was observed by others in NNG and CSS.

San Diego Desert Woodrat *(Neotoma lepida intermedia)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: none
Distribution: Coastal and desert areas of Southern California
Habitat: Open, dry, rocky hillsides in coastal sage scrub and chaparral
Status on site: Observed by others in the northern and central portions of the site.

White-tailed Kite / *Elanus leucurus*
Listing: "Fully Protected Raptor" (CDFW, 1999)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 1 Species
State status: "Fully Protected" (CFGC Sections 3511, 4700, 5050 & 5515)
Federal status: Protected Raptor (16 U.S.C. 668-668d, 54 Stat. 250), as amended
Distribution: White-tailed Kites breed primarily along the coastal lowland, and the species occurs over a broad area of the western U.S. through Mexico and into South America.
Habitat(s): Roost and nest in a variety of woodland habitats. Mainly riparian woodlands, oak groves, related habitats.
Status onsite: Single specimen observed during 2007 focused California Gnatcatcher survey. This species likely forages onsite on occasion due to the openness of the habitat.

Comments: Population numbers in San Diego County appear to have increased since the 1950's, and this species is not currently considered threatened or endangered.

Northwestern San Diego Pocket Mouse *(Chaetodipus fallax fallax)*
Listing: State status: "Species of Special Concern" (CDFW, 2009)
County status: San Diego County "Sensitive Animal" List (DPLU, 2010), Group 2 Species
Federal status: "Species of Concern" (USFWS, 2005)
Distribution: Occurs in Southwestern California, with subspecies *fallax* occurring on the coastal side of the mountains.
Habitat: Found in open areas of sage scrub, chaparral, and related open habitats
Status on site: Observed by others in the northern and central portions of the site.

A number of additional sensitive animals are known from general vicinity of property, however. Some of these have a reasonable probability of occurring on or utilizing this site, at least on an occasional basis. These include various native bats *(Choeronycteris, Eumops, Antrozous, Macrotus, Myotis, Nyctinomops)*, and other nocturnal or cryptic species. Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 4.

Directed Field Survey for California Gnatcatcher

California Gnatcatcher *(Polioptila californica)*, a federally-listed Threatened Species, is known from habitat similar to that found on portions of the T&R Mini-Storage project site. Gnatcatchers occur in coastal and interior areas of coastal sage and related scrub habitats typically dominated by California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. Presence/absence field surveys for California Gnatcatcher were conducted by TeraCor biologist Samuel Reed in 2001 and again 2007. An updated gnatcatcher survey of the project development area, plus buffer, was completed by the Mrs. Church of RC Biological Consulting, Inc. in 2012.

No California Gnatcatchers were detected on the T&R Mini-Storage project site during any of the field surveys, including the 2012 survey of a portion of the site. For this reason, the site is considered "unoccupied" by this federally-listed Threatened Species.

Jurisdictional Wetlands and Waterways – Wetland Survey

Wetlands and "waters" are present on portions of the project site in association with various onsite drainages and tributaries. These areas of the site support hydrophytes, hydric soils, and/or wetlands hydrology.

A directed RPO wetland survey was completed as a part of the biology study of the original MUP project site. This resulted in the preparation of a Wetland Survey Report, which indicated that the original project would not impact any jurisdictional wetlands or "waters", including RPO wetlands. In examining the other drainages on Parcel "A" and in the ROW, the project civil engineer determined that these other onsite drainages currently have no drainage function due to the impacts caused by the placement of Interstate 15 to the west to the property, which severed the natural hydrology and the flows to these swales.

Other Unique Features/Resources

The T&R Mini-Storage project site does not support any regionally-unique land features. The native and naturalized habitats found on this site are not unique to this area, and the property does not support any unusual biological features.

The site provides foraging habitat for various locally common species of raptors and other carnivores. No wildlife nursery sites were detected although faunal reproduction clearly does take place onsite in many areas, including underground, in bird nests, etc. There is potential for large mammals to use the site, and Mule Deer *(Odocoileus hemionus)* scat was reported to have been observed. This is in addition to other, urban-tolerant species such as skunks, coyotes, raccoons, etc. The probability for Mountain Lion *(Felix concolor)* to use the site is considered low.

The project falls entirely within the "I-15 corridor", and area of known passage for species such as California Gnatcatcher and others that move along the fragmented archipelago of CSS and other habitats from Escondido north to Riverside County. The T&R Mini-Storage project was redesigned to retain a functioning wildlife corridor that runs north-south within the property. The approved design provides a 315-foot wide onsite corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the I-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement.

Significance of Project Impacts and Proposed Mitigation

The T&R Mini-Storage MUP project was subject to review under the California Environmental Quality Act (CEQA) and was required to provide compliance with the County's RPO and Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources. This meant that the County required that project-related impacts to biological resources be "less than significant", as defined by CEQA, and that all RPO requirements and the Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources be met. This meant the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". All project-related impacts, as identified during the original CEQA analysis, were fully mitigated prior to the issuance of the MUP and approval of the project's Grading Permit. Because the Grading Permit is proposed for extension, additional impacts from the proposed materials disposal are anticipated. These are presented in Table 3.

Direct and Indirect Impacts

Development of the T&R Mini-Storage MUP project site as proposed resulted in a number of project-related direct and indirect impacts. Direct impacts resulted from the actual removal of habitat, plants, and animals from the site through brushing clearing and grading. These direct impacts are considered permanent because they result in a conversion of habitats to buildings, landscaped areas, roads, etc. Indirect impacts also affect plants, animals, and habitats that occur on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". The indirect impacts associated with site conversion are less quantifiable, due to the uncertainty associated with edge effects.

The following project-related impacts were identified with construction of the T&R Mini-Storage project. All of these impacts were mitigated as a part of the original MUP approvals and related permitting, reducing impacts to **less than significant**:

- 2.8 acres of CSS was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.9 acre of SMC was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 1.4 acre of NNG was impacted by development. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- 0.1 acre of DH was impacted by development. The County of San Diego did not required mitigation for this loss pursuant to the "Guidelines for Determining Significance". The project impacted habitat for at least fourteen Special States Species, including five Group 1 bird species and nine Group 2 species. The County of San Diego required mitigation for this loss pursuant to the "Guidelines for Determining Significance".
- The project as approved impacted a functioning wildlife corridor that runs north-south within the "I-15 corridor". Impacts to this corridor were considered **less than significant** because adequate corridor width (315' onsite plus 100' offsite) was maintained and open space was placed over the corridor area to preserve the biological resources within it in perpetuity.

Extension of the Grading Permit will result in additional project impacts, as follows:

The use of N. Center City Parkway to access Parcel "A" for dirt and rock disposal or the use of the back-up alternative (SuperStacker ® Model KPI/JCI 36130 conveyor belt system) will impact the following habitats:

- 4.7 acre of SMC. All of the CSS and NNG on Parcel "A" would be avoided by design at this time. The County of San Diego will require mitigation for this loss pursuant to the "Guidelines for Determining Significance".

Cumulative Impacts

Cumulative impacts refer to a project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects (Public Resources Code § 21083; California Code of Regulations, Title 14, § 15064[h], 15065[c], 15130, and 15355). Cumulative impacts can occur when individually minor but collectively significant projects take place over time.

A list of past, present and future projects that could cumulatively contribute to the projects significant impacts was compiled based on the defined study area. The study area was determined based on several factors including land use, habitats, draft North County MSCP boundaries and species ranges. The general boundaries of this study area extend from the draft North County MSCP PAMA boundaries to the north adjacent to Tierra Libertia Road, the Escondido city limits to the south and west and the draft North County MSCP PAMA boundaries to the east, approximately half the distance to North Broadway. The list of cumulative projects within this study area is as follows:

AD 07-057	HARTMAN, AD, LOT CLEARING

MUP 99-007	DRAGOO WINERY
MUP 04-050	RANCHO VERONA, MUP, GROUP RESIDENTIAL
MUP 10-003	CORTEL MUP CELL SITE TMO SD6110, P10-003
MUP 10-027	DOUGHERTY PET RESORT/MUP 10-027
MUP 84-112-01	THUNDERBIRD GOLF DRIVING RANGE
MUP 84-112-02	PRACTICE PERFECT GOLF RANGE
ZAP 02-032	JESMOND DENE / SPRINT
ZAP 00-145	SPRINT SDG&E / SPRINT
ZAP 00-059	WILLIAMS COMMUNICATIONS
STP 01-034	MESA ROCK RESIDENCE SITE PLAN
STP 01-045	LANTIS SITE PLAN
STP 03-019	CRV ESCONDIDO 68 SITE PLAN
STP 03-020	MONTREUX MODEL HOME
STP 99-038	HERALD LANTIS
STP 04-025	SITE PLAN FOR SFD IN I-15 CORRIDOR
STP 05-030	MONTREUX
STP 07-041	HARTMAN/STP/EASY TURF STORAGE BLDG
STP 08-015	ADJ HOLDINGS, SITE PLAN I-15 REVIEW, S 0
TM 5114	MONTREUX TM
TPM 19895	STEPHENS 4 LOT SPLIT - TPM
TPM 20420	LANTIS TPM
TPM 20879	KNOX TENTATIVE PARCEL MAP
TPM 21192	RUA MICHELLE, TPM 21192

Cumulative projects within the geographic scope of analysis would have the potential to result in impacts to Special Status Species, including various plants and animals, including loss of habitat. Of the 24 cumulative projects analyzed, 17 were either withdrawn or determined not to result in impacts to biological resources. The remaining 7 cumulative projects have the potential to impact habitat and sensitive species through clearing, grading, grubbing, trenching, and other construction activities.

Extension of the Grading Permit would result in additional impacts, including impacts to SMC and potentially CSS and NNG. These vegetation types are relatively well distributed in San Diego County, although all are sensitive and depleted in many areas. Therefore, from a regional perspective, the relatively minor impacts to the above vegetation types, although adverse and significant, are not cumulatively considerable when viewed in connection with the substantial acreages these habitat types remaining in the San Diego County region.

Impacts to the above habitats will be mitigated for in kind, reducing impacts to a level below significance. Fourteen sensitive species were observed on the project site. Impacts to these species, although adverse and potentially significant, are not cumulatively considerable when viewed in connection with the substantial numbers of these species remaining in the San Diego County region.

Furthermore, the project falls entirely within the "I-15 corridor", an area of known passage for species such as California gnatcatcher and others that move along the fragmented archipelago of coastal sage scrub and other habitats from Escondido north to Riverside County. The project was designed to retain a functioning wildlife corridor that runs north-south within the property. The project provided a 315-foot wide onsite

corridor on the western side of the project development area. Together with an approximately 100 feet of additional offsite corridor width at this location in the 1-15 right-of-way, the total wildlife corridor is approximately 415 feet wide to the west of the project development area between the buildings and the edge of the freeway pavement. With the recordation of onsite open space over the existing wildlife corridor, the project resulted in a less than significant impact to wildlife movement and would not result in a cumulatively considerable impact to wildlife movement in the study area.

In summary, with the mitigation requirements for biological resources on this site, neither the project nor the back up alternative would not result in cumulatively considerable impacts on sensitive habitats, sensitive species or existing wildlife movement.

Proposed Mitigation

Extension of the Grading Permit to use Parcel "A" for dirt disposal will result in impacts to regulated habitats, and in order to satisfy the requirements of the County's "Guidelines for Determining Significance", and current County policy for mitigating impacts to habitats, the following mitigation measures are recommended:

The project shall provide mitigation at a 1:1 ratio for impacts to up to 4.7 acre of SMC. This is equivalent to 4.7 acre of SMC. This may be satisfied onsite, as follows:

1. The original approval of the MUP and Grading Permit created an excess 11.0 acres of SMC beyond what was required to mitigate the original Grading Permit impacts (see Attachment A). At this time, it is recommended that the County apply 4.7 acres of this 11.0-acre excess to offset impacts to 4.7 acres of SMC which would be impacted on Parcel "A" and the adjoining ROW. This again represents a 1:1 ratio for impacts to SMC on Parcel "A". This area is already within a dedicated Biological Open Space Easement, so no additional dedications would be required.

or

2. The implementation of the back-up alternative (conveyor belt) to tranporting dirt will have no additional impacts beyond the 4.7 acres of SMC which would be impacted on Parcel "A" by the placement of material. Mitigation would still be at a 1:1 ratio for impacts to SMC on Parcel "A" and mitigation will take place within a dedicated Biological Open Space Easement, so no additional dedications would be required.

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Preparer and Persons/Organizations Contacted

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Attachments

Figure 1. Regional Location
Figure 2. Aerial Photograph
Figure 3. Biological Resources
Figure 4. Biological Resources on Extended Grading Permit

Table 1. Field Surveys
Table 2 Flora and Fauna Detected
Table 3. Impact/Mitigation Analysis
Table 4. Sensitive Species Known from the Vicinity

Figure 1. Regional Location – T&R Mini-Storage Project Site
Portion of the U.S.G.S "Valley Center, California" 7.5′ Quadrangle

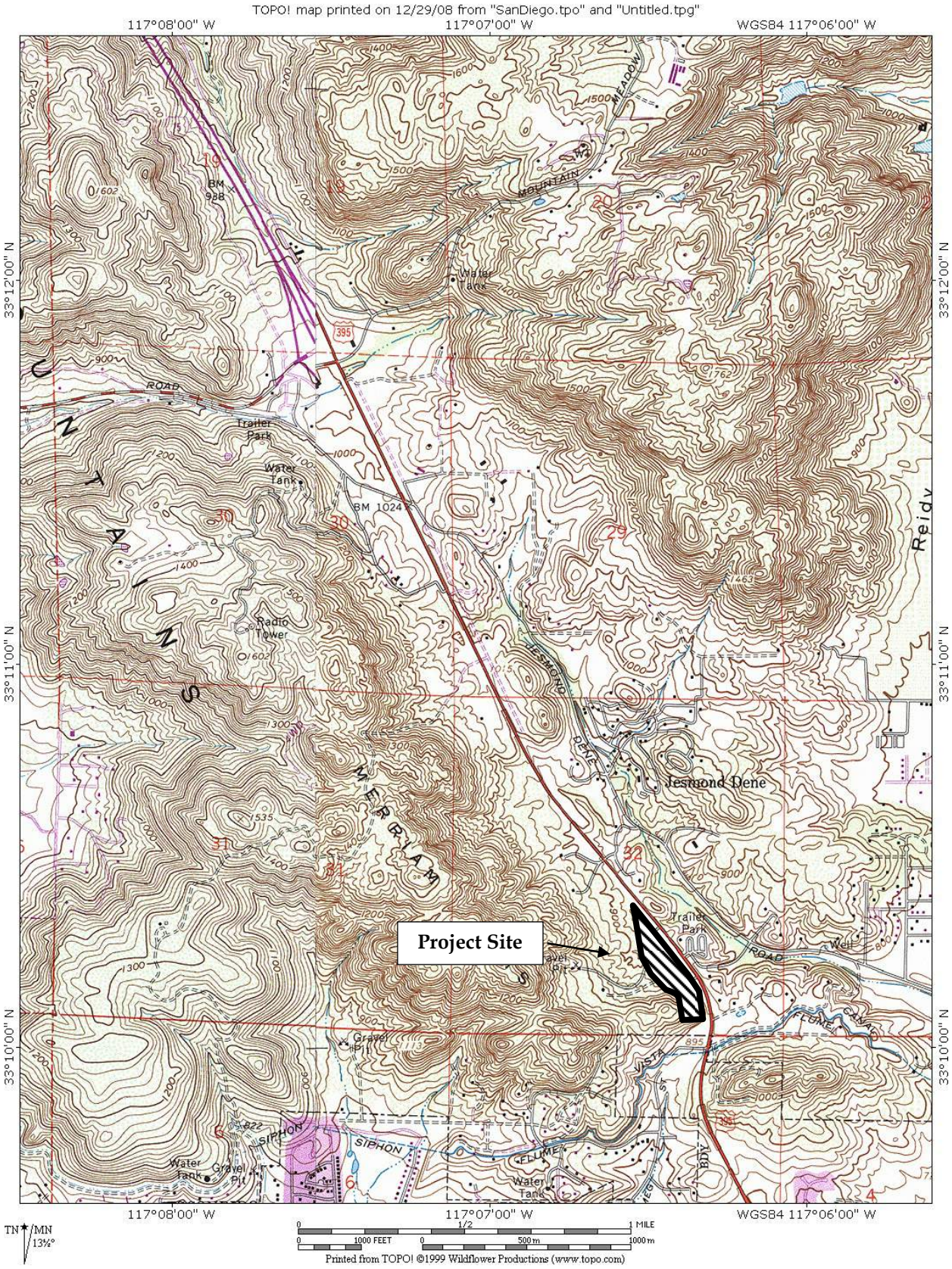

Figure 2. Aerial Photograph – T&R Mini-Storage Project Site

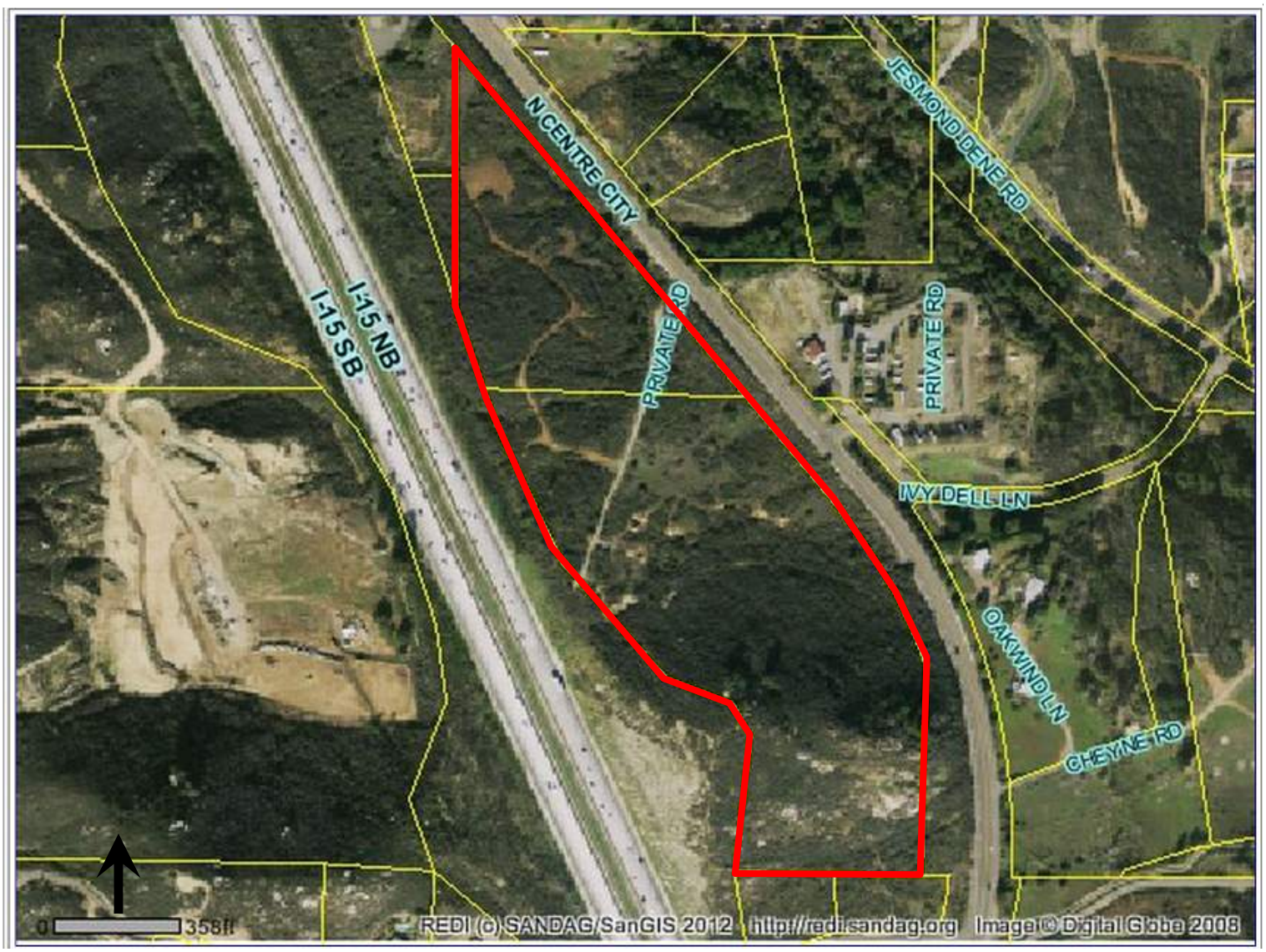

Figure 3. Biological Resources – T&R Mini-Storage Project Site

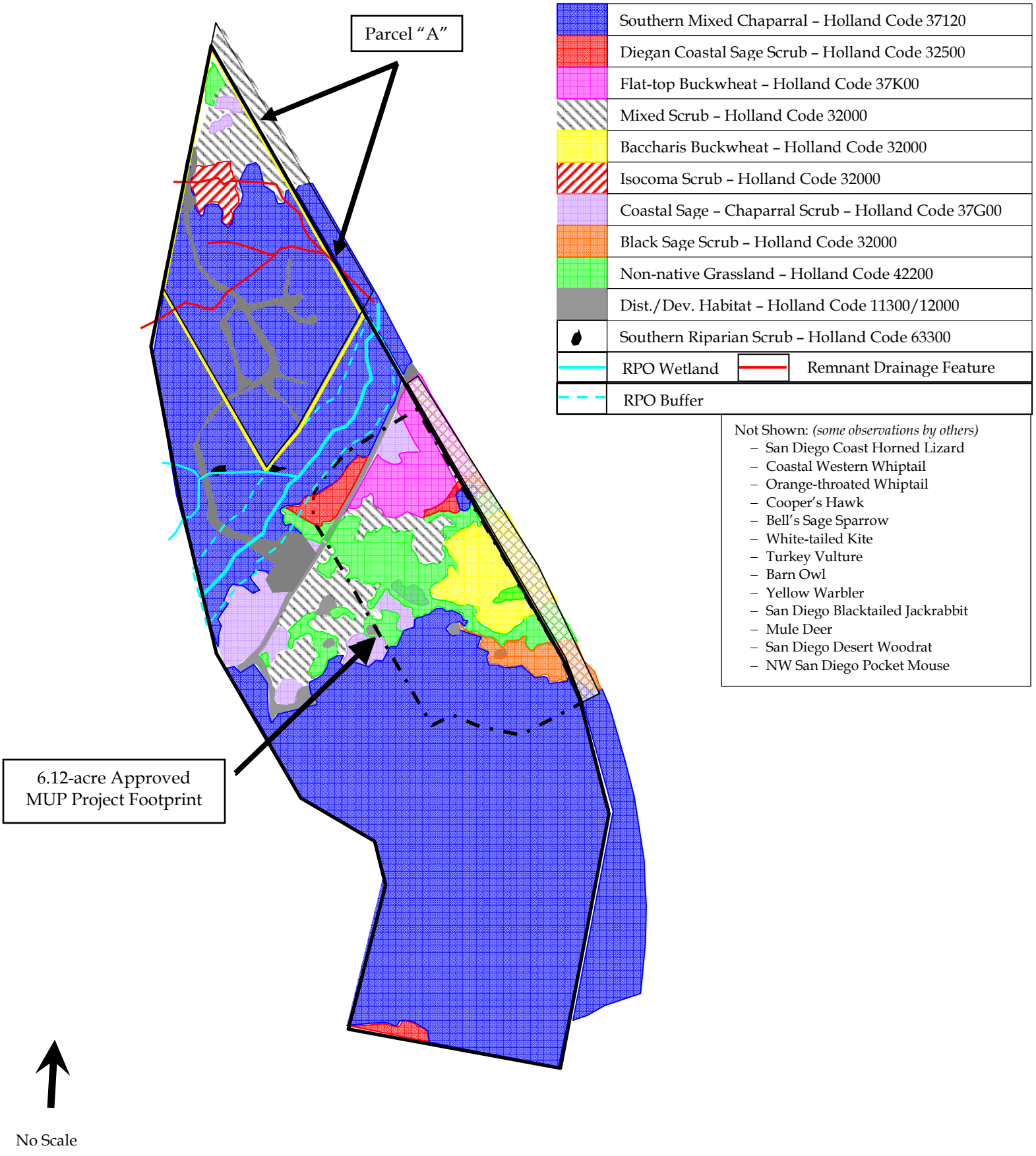

Figure 4. Biological Resources on Extended Grading Permit (Parcel "A")
Haul Route/Traffic Control Alternative

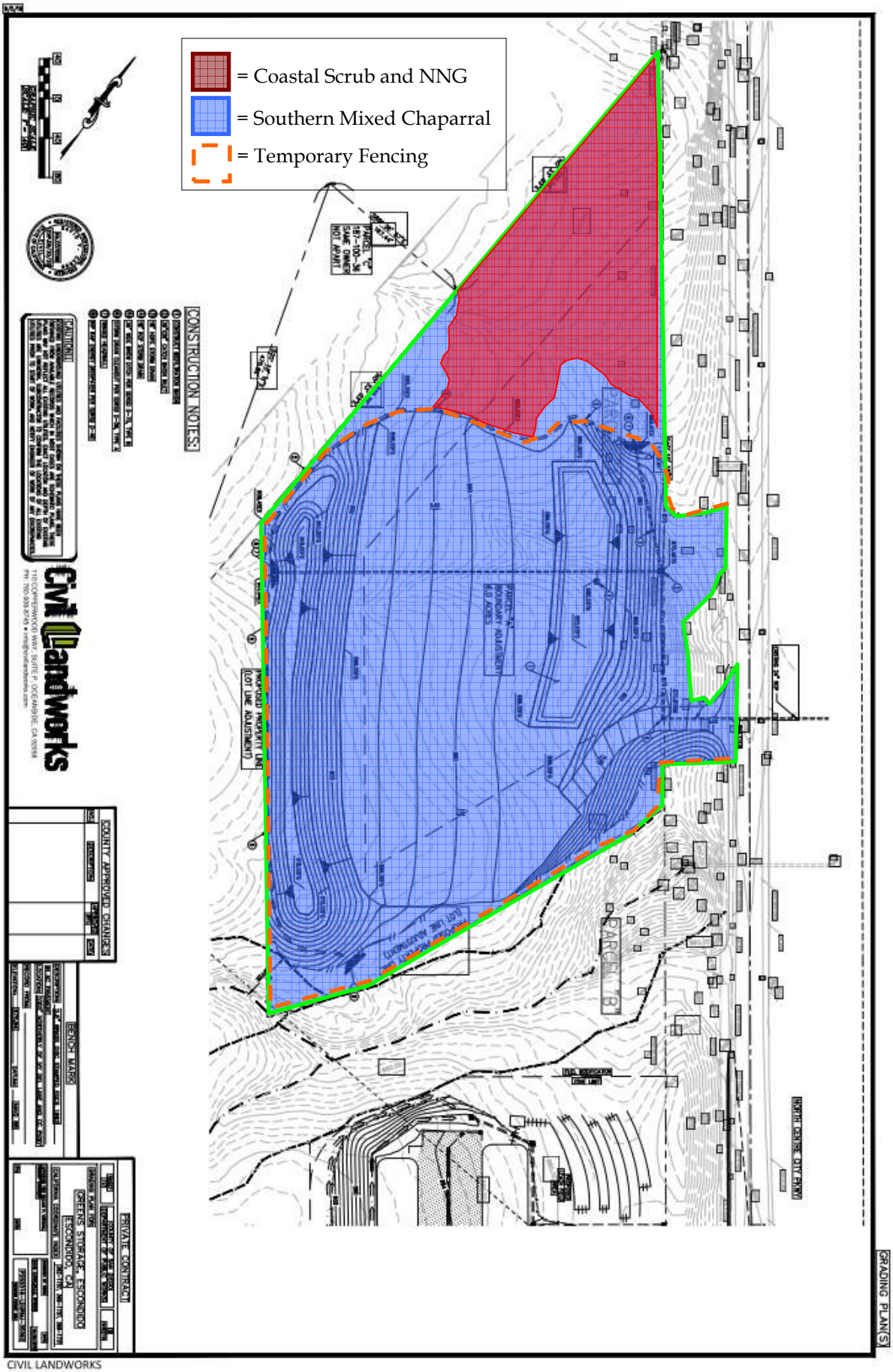

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Figure 5. Biological Resources on Extended Grading Permit (Parcel "A")
SuperStacker ® Conveyor Belt System Back-up Alternative

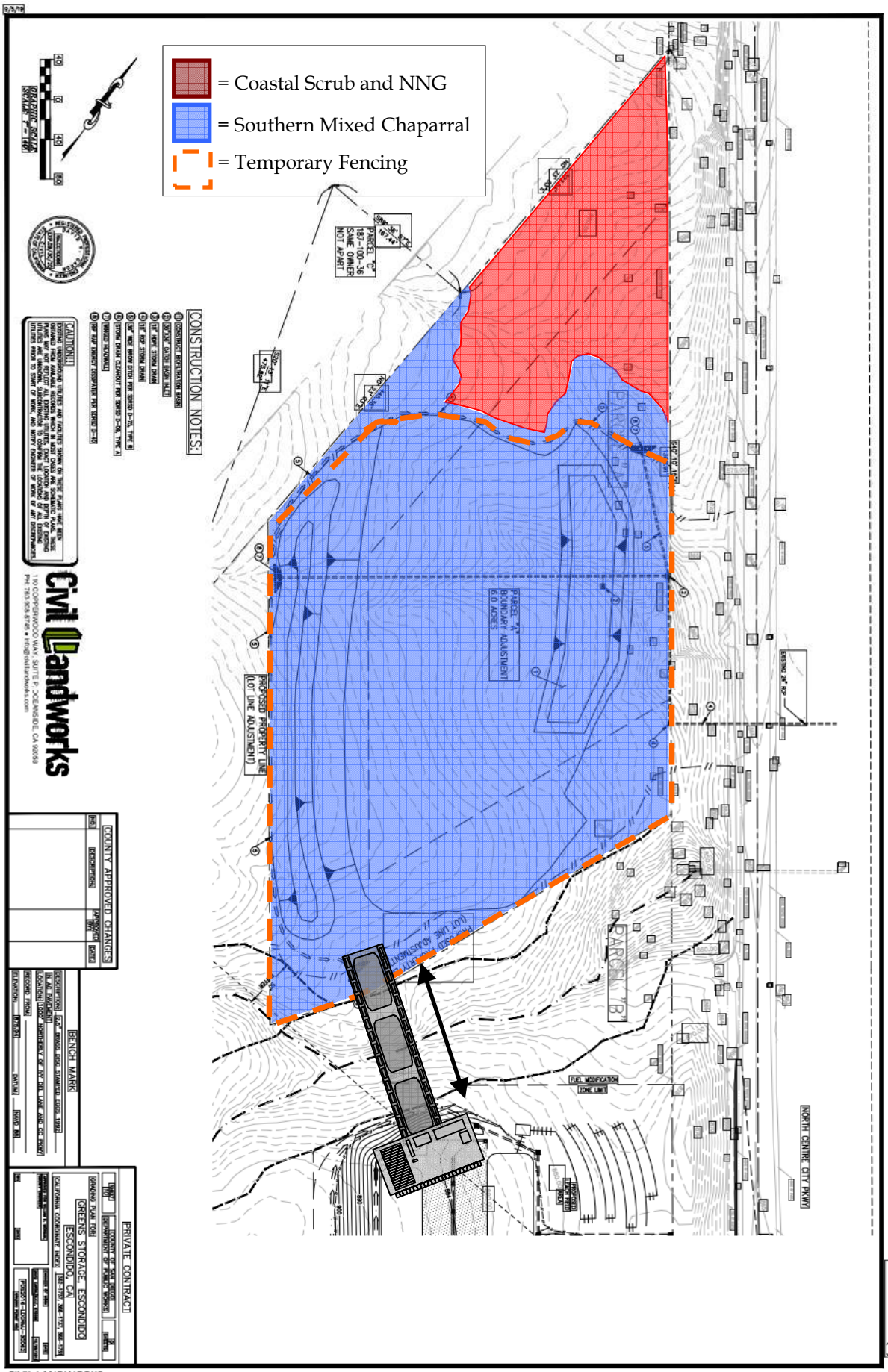

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Figure 6. SuperStacker ® Conveyor Belt System for the Extended Grading Permit (Parcel "A")

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
05 Mar 2001	SR	n/a[1]	Quino	n/a
16 Mar 2001	SR	n/a	Quino	n/a
24 Mar 2001	SR	n/a	Gnatcatcher	n/a
25 Mar 2001	SR	n/a	Quino	n/a
31 Mar 2001	SR	n/a	Gnatcatcher	n/a
03 Apr 2001	SR	n/a	Quino	n/a
13 Apr 2001	SR	n/a	Gnatcatcher + Quino	n/a
06 Dec 2002	SR	n/a	General	n/a
15 Jan 2003	SR, WM	n/a	General + Mapping	n/a
20 Jan 2003	SR, WM	n/a	General + Mapping	n/a
23 Jan 2003	SR, WM	n/a	General + Mapping	n/a
26 Jan 2003	SR, WM	n/a	General + Mapping	n/a
10 Mar 2003	SR ?	n/a	Wetlands	n/a
01 Apr 2003	SR ?	n/a	Wetlands	n/a
08 May 2003	SR	n/a	Floral	n/a

[1] *n/a – data not available*

Table 1. Field Surveys – T&R Mini-Storage Project Site

Date	Personnel	Hours	Study	Conditions
30 Mar 2007	SR ?	n/a	Gnatcatcher	n/a
07 Apr 2007	SR	n/a	Gnatcatcher	n/a
15 Apr 2007	SR ?	n/a	Gnatcatcher	n/a
18 Apr 2007	PV	n/a	Kangaroo Rat	n/a
19 Apr 2007	PV	n/a	Kangaroo Rat	n/a
20 Apr 2007	PV	n/a	Kangaroo Rat	n/a
22 Apr 2007	PV	n/a	Kangaroo Rat	n/a
23 Apr 2007	PV	n/a	Kangaroo Rat	n/a
24 Apr 2007	PV	n/a	Kangaroo Rat	n/a
02 May 2007	SR ?	n/a	Gnatcatcher	n/a
15 May 2007	SR ?	n/a	Gnatcatcher	n/a
22 May 2007	SR ?	n/a	Gnatcatcher	n/a
27 Sep 2011	VS	10:00-12:45	General	Clear skies, temps in the high 70°s to low 90°s, no wind
12 Oct 2011	VS	08:45-12:30	General + Mapping	Clear skies, temps in the low 80°s to high 90°s, no wind
06 Jan 2012	VS	08:45-12:30	General + Wetlands	Clear skies, temps in the low 60°s, no wind
31 May 2019	VS, BM	09:00-02:30	Parcel "A + Access	Clear skies, temps in the mid 70°s, no wind

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Plants	
Acmispon glaber	Deerweed
Acourtia microcephala	Sacapellote
Adenostoma fasciculatum	Chamise
Ailanthus altissima *	Tree Of Heaven
Amsinckia sp.	Fiddleneck
Antirrhinum nuttallianum	Nuttall's Snapdragon
Artemisia californica	California Sagebrush
Artemisia douglasiana	Mugwort
Asclepias fascicularis	Narrowleaf Milkweed
*Avena barbata**	Slender Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis salicifolia	Mule Fat
Baccharis sarothroides	Broom Baccharis
Brassica nigra *	Black Mustard
Brickellia californica	Bricklebush
Bromus diandrus *	Ripgut Brome
Bromus hordeaceus *	Common Soft-Brome
Bromus rubens *	Red Brome
Calystegia macrostegia	Morning-Glory
Camissonia hirtella	Evening Primrose
Camissoniopsis bistorta	California Sun Cup
Capsella bursa-pastoris	Shepherd's Purse
Carduus pycnocephalus *	Italian Thistle
Carex triquetra	Trigonous Sedge
Castilleja densiflora	Parish's Owl's-Clover
Ceanothus tomentosus	Woollyleaf Ceanothus
Centaurea melitensis *	Tocalote
Cercocarpus minutifolius	San Diego Mountain-Mahogany
Chaenactis glabriuscula	Glabriuscula
Cirsium occidentale	Cobwebby Thistle
Claytonia parviflora	Narrow-Leaved Miner's Lettuce
Clematis pauciflora	Rope-Vine
Conium maculatum *	Poison Hemlock
Cordylanthus rigidus	Stiffbranch Bird's Beak
Corethrogyne filaginifolia var. virgata	Common Sand Aster
Crassula connata	Pygmy-Weed
Cryptantha intermedia	Common Cryptantha
Cuscuta californica	California Dodder
Cyperus sp.	Sedge
Daucus pusillus	American Wild Carrot
Deinandra fasciculata	Clustered Tarweed
Dicentra chrysantha	Golden Eardrops
Dichelostemma pulchellum	Blue Dicks
Diplacus x australis	San Diego Monkeyflower
Dudleya pulverulenta	Chalk Live-Forever
Encelia farinosa *	Brittle Bush
Eriastrum filifolium	Lavender Woollystar
Eriogonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
*Erodium cicutarium**	Filaree

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Erythranthe guttata	Seep Monkeyflower
Eucrypta chrysanthemifolia	Common Eucrypta
*Euphorbia peplus**	Petty Spurge
Foeniculum vulgare	Fennel
Galium sp.	Bedstraw
Hazardia squarrosa	Saw-Toothed Goldenbush
Helianthemum scoparium	Peak Rush-Rose
Helianthus gracilentus	Sunflower
Heteromeles arbutifloia	Toyon
*Hirschfeldia incana**	Perennial Mustard
*Hordeum sp.**	Wild Barley
*Hypochaeris glabra **	Smooth Cat's Ear
Isocoma menziesii	Goldenbush
Keckiella antirrhinoides	Chaparral Beardtongue
Keckiella cordifolia	Climbing Bush Penstemon
*Lamarckia aurea**	Goldentop
Lepidium nitidum var. nitidum	Shining Peppergrass
Leymus condensatus	Giant Wild Rye
Linaria canadensis	Blue Toadflax
*Lobularia maritima **	Sweet Alyssum
*Logfia filaginoides**	California Cottonrose
*Logfia gallica **	Narrowleaf Cottonrose
Lonicera subspicata	Southern Honeysuckle
Lotus scoparius	Deer Weed
Lupinus bicolor	Miniature Lupine
Lupinus sp.	Lupine
Lysimachia arvensis	Scarlet Pimpernel
Malacothamnus fasciculatus	Bushmallow
Malosma laurina	Laurel Sumac
*Malva parviflora**	Cheese Weed
Marah marcocarpus	Wild Cucumber
*Marrubium vulgare**	Horehound
Mimulus guttatus	Monkey Flower
Mirabilis sp.	Wishbone Bush
Muhlenbergia rigens	Deer Grass
Muhlenbergia sp.	Muhly
Nassella lepida	Foothill Needle Grass
Nassella pulchra	Purple Needle-Grass
Navarretia hamata	Hooked Navarretia
Nicotiana glauca	Tree Tobacco
*Olea europa **	European Olive
Oxalis micrantha	Dwarf Woodsorrel
Paeonia californica	California Peony
Pectocarya penicillata	Pectocarya
Penstemon spectabilis	Showy Penstemon
Pentagramma triangularis	Goldback Fern
Phacelia cicutaria	Caterpillar Phacelia
Phacelia grandiflora	Big-Flower Phacelia
Phacelia minor	Canterbury Bells
Phacelia parryi	Parry Phacelia
Phacelia ramosissima	Scorpionweeds
Phacelia sp.	Phacelia

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Phoenix canariensis *	Canary Island Palm
Pityrogramma triangularis var. *triangularis*	Goldenback Fern
Polycarpon tetraphyllum	Fourleaf Manyseed
Polypodium californicum	California Polypody
Prunus ilicifolia	Holly-Leafed Cherry
Pseudognaphalium beneolens	Fragrant Everlasting
Pseudognaphalium bolettii	Bicolored Cudweed
Pseudognaphalium californicum	California Cudweed
Pseudognaphalium stramineum *	Cudweed
Pterostegia drymarioides	Fairy Mist
Quercus x acutidens	Torrey's Hybrid Oak
Quercus agrifolia	Coast Live Oak
Quercus berberidifolia	Scrub Oak
Rhamnus crocea	Spiny Redberry
Rhamnus ilicifolia	Holly-Leaf Redberry
Rhus aromatica	Fragrant Sumac
Rhus integrifolia	Lemonadeberry
Rhus ovata	Sugar Bush
Ribes indecorum	White Flowering Currant
Salix lasiolepis	Arroyo Willow
Salvia apiana	White Sage
Salvia mellifera	Black Sage
Sambucus cerulea	Blue Elder
Sanicula crassicaulis	Sanicula
Schismus barbatus *	Mediterranean Grass
Scrophularia californica	California Bee Plant
Selaginella sp.	Spike-Moss
Sisyrinchium bellum	Blue-Eyed Grass
Solanum americanum *	Nightshade
Solanum parishii	Parish's Nightshade
Sonchus asper *	Prickly Sowthistle
Stephanomeria exigua	Small Wire-Lettuce
Stylocline gnaphaloides	Everlasting Neststraw
Thysanocarpus sp.	Lacepod
Toxicodendron diversilobum	Poison Oak
Triodanis biflora	Venus' Looking-Glass
Vulpia myuros *	Rat's-Tail Fescue
Xylococcus bicolor	Mission Manzanita
Yucca whipplei	Foothill Yucca
Zeltnera venusta	California Centaury

Birds

Accipiter cooperii	**Cooper's Hawk**
Amphispiza belli belli	**Sage Sparrow**
Aphelocoma coerulescens	Scrub Jay
Archilochus alexandri	Black-Chinned Hummingbird
Baeolophus inornatus	Oak Titmouse
Buteo jamaicensis	Red-Tailed Hawk
Buteo lineatus	**Red-Shouldered Hawk**
Callipepla californicus	California Quail
Calypte anna	Anna's Hummingbird

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Carduelis psaltria	Lesser Goldfinch
Carduelis tristis	American Goldfinch
Carpodacus mexicanus	House Finch
Cathartes aura	**Turkey Vulture**
Chamaea fasciata	Wrentit
Colaptes auratus	Northern Flicker
Columba livia *	Rock Dove
Corvus brachyrhynchos	American Crow
Corvus corax	Common Raven
Dendroica coronata	Audubon's Warbler
Dendroica coronata	Yellow-Rumped Warbler
Dendroica petechia	**Yellow Warbler**
Elanus leucurus	**White-Tailed Kite**
Euphagus cyanocephalus	Brewer's blackbird
Falco sparverius	American kestrel
Geococcyx californicus	Greater Roadrunner
Guiraca caerulea	Blue Grosbeak
Icterus bullockii	Bullock's Oriole
Melospiza melodia	Song Sparrow
Mimus polyglottos	Northern Mockingbird
*Passer domesticus**	House Sparrow
Picoides pubescens	Downy Woodpecker
Pipilo crissalis	California Towhee
Pipilo erythrophthalmus	Spotted Towhee
Polioptila caerulea	Blue-Gray Gnatcatcher
Psaltriparus minimus	Bushtit
Sayornis nigricans	Black Phoebe
Sitta carolinensis	White-Breasted Nuthatch
Stelgidopteryx seripennis	Northern Rough-Winged Swallow
*Sturnus vulgaris *	European Starling
Thryomanes bewickii	Bewick's Wren
Toxostoma redivivum	California Thrasher
Trogoldytes aedon	House Wren
Tyrannus verticalis	Western Kingbird
Tyto alba	**Barn Owl**
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-Crowned Sparrow

Mammals

Canis latrans	Coyote
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse
Dipodomys agilis	Pacific Kangaroo Rat
Lepus californicus bennettii	**San Diego Black-tailed Jackrabbit**
Neotoma lepida	**San Diego Desert Woodrat**
Odocoilus hemionus	**Mule Deer**
Peromyscus maniculatis	Deer Mouse
Procyon lotor	Raccoon
Spermophilus beecheyi	California Ground Squirrel
Sylvilagus audubonii	Desert Cottontail

Amphibians and Reptiles

Table 2. Flora and Fauna Detected – T&R Mini-Storage Project Site

Scientific Name	Common Name
Batrachoseps major	Garden Salamander
Bufo boreas	Western Toad
Cnemidophorus tigris multiscutatus	**Coastal Western Whiptail**
Cnemidophorus hyperythrus beldingi	**Orange-throated Whiptail**
Lampropeltis californiae	California King Snake
Phrynosoma coronatum blainvillei	**San Diego Horned Lizard**
Pseudacris regilla	Pacific Chorus Frog
Sceloporus occidentalis	Western Fence Lizard
Uta stansburiana	Side-Blotched Lizard

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* – non-native taxon
bold – sensitive taxon

Table 3. Habitat Impact/Mitigation Analysis – T&R Mini-Storage Grading Permit Extension Project

Parcel "A" + Access Impact/Mitigation Analysis				
Biological Resource	Total	Impacted	Impact Neutral	Mitigation Required
SMC	4.9 acres	4.7 acres	n/a	4.7 acres @ 1:1
CSS	1.5 acres	none	n/a	avoidance
NNG	0.1 acre	none	n/a	avoidance
Total	**6.5 acres**			**4.7 acres in BOSE[2]**

[2] *Represents utilization of 4.7 acres of 11.0 acres of SMC already in dedicated Biological Open Space Easement*

Table 4. Sensitive Species Known from the Vicinity – T&R Mini-Storage Project Site

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Arctostaphylos rainbowensis	Rainbow Manzanita					A		X																	L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A			X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D		X				X													L	1a
Harpagonella palmeri	Palmer's Grappling Hook					D	X		X			X													L	1a
Horkelia truncata	Ramona Horkelia					A		X																	L	1a
Monardella hypoleuca lanata	Felt Leaved Rock Mint					A		X				X													L	1a
Nolina cismontana	Chaparral Beargrass					A		X				X													L	1b
Piperia leptopetala	Narrow-Petaled Rein Orchid					D		X			X	X	X												M	2b
Polygala cornuta fishiae	Fish's Milkwort					D		X				X													L	2b
Satureja chandleri	San Miguel Savory					A		X				X													L	1a
Senecio ganderi	Gander's Butterweed			X		A		X				X													L	1a
Tetracoccus dioicus	Parry's Tetracoccus					A		X				X													L	1b
Accipiter cooperi	Cooper's Hawk						X	X	X	X	X	X	X	X							X				O	--
Accipiter striatus	Sharp-Shinned Hawk						X	X		X	X	X	X	X											M	2a
Agelaius tricolor	Tricolored Blackbird								X	X						X								X	L	1a
Aimophila ruficep canescens	Rufous-Crowned Sparrow						X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow								X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow						X	X				X													O	--
Anniella pulchra pulchra	Silvery Legless Lizard						X		X	X												X			M	2a
Antrozous pallidus	Pallid Bat						X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle				X		X	X	X		X	X	X	X	X										L	1c
Bassariscus astutus	Ringtail							X		X	X	X													L	1a
Buteo lineatus	Red-Shouldered Hawk						X	X	X	X	X	X	X	X											O	--
Cathartes aura	Turkey Vulture						X	X	X	X	X	X	X	X											O	--
Chaetodipus c. femoralis	Dulzura CA Pocket Mouse						X	X	X		X	X	X												M	2a
Chaetodipus fallax fallax	NW San Diego Pocket Mouse						X	X	X			X					X	X							O	--
Charina trivirgata roseofusca	Coastal Rosy Boa						X	X			X	X													M	2a
Circus cyaneus hudsonius	Northern Harrier						X		X							X			X					X	M	2a
Cnemidophorus hyperythrus	Orange-Throated Whiptail						X	X	X	X		X													O	--
Cnemidophorus t. multiscutatus	Coastal Western Whiptail							X		X	X	X													O	--
Coleonyx variegatus abbotti	SD Banded Gecko						X		X			X													L	1a
Corynorhinus townsendii	Townsend's Bigeared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	N. Red Diamond Rattlesnake						X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				H	3a
Dendroica petechia brewsteri	Yellow Warbler						X	X		X	X	X	X	X											O	--
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											H	3a
Dipodomys stephensi	Stephen's Kangaroo Rat	X	X				X		X																L	1a
Elanus leucurus	White-tailed Kite								X	X															O	--
Eremophila alpestris actis	Horned Lark								X												X				M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Larus californicus	California Gull (Non-Breeding)								X							X			X		X	X	X		L	1a
Lepus californicus bennettii	San Diego Black-tailed Jackrabbit						X	X	X		X	X	X	X											O	--
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X	X	M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X	X		X	X	X	X	X	X									O	--

Latin Name	**Common Name**	Federally Endangered	State Threatened	State Rare	MSCP Narrow Endemic	Co. Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	**Probability of Occurrence**	**Basis for Determination**
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
Perognathus longimembris brevinasus	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
Tyto alba	Barn Owl						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	O	--

Probability of Occurrence Codes:
L – Low Probability; rare species in area. Most of these species occur on habitat not found on the project site, including vernal pools, coastal dunes, etc. California Red-legged Frogs and Yellow-billed Cuckoo are two examples of species that fit into this category. Both are extremely rare in California.
M – Moderate Probability. Most of these species occur in habitat similar to that found onsite, although they may or may not utilize the subject property. Native bats and uncommon but cryptic reptiles are examples of species that have a moderate probability of occurring onsite
H – High Probability. Most of these species are expected to use the project site, but are difficult to reliably detect. Examples include fossorial reptiles and amphibians, wide-ranging birds, etc.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)
1c – obvious species that would have been seen or otherwise detected if present (animal)
2a - could possibly occur onsite on at least an occasional basis, based on habitat quality (animal)
2b - could occur onsite, but very rare, and/or species poorly known to science (plant)
3a - nearly certain to occur onsite on a regular basis, but cryptic, seasonal, or otherwise difficult to detect (animal)
3b – cryptic or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plant)

Attachment A

Memorandum on Mitigation dated 29 August 2019

VINCENT N. SCHEIDT

Biological Consultant

3158 Occidental Street • San Diego, CA • 92122-3205 • 858-457-3873 • 858-336-7106 cell • email: vince.scheidt@gmail.com

Memorandum

To: Dr. Raj Kadakia

From: Vince Scheidt, Consulting Biologist

Date: August 29, 2019

RE: Comments on Mitigation; Escondido Mini-Storage Project, PDS2005-3910-0508031

Per your request, I have evaluated the acreage of Southern Mixed Chaparral (SMC) within the open space easement area on the subject project site. According to my 2013 biology report, the original project required 1.9 acres of SMC to be preserved onsite in open space in order to fully mitigate impacts to SMC. The open space easement you dedicated supports 12.9 acres of SMC, which is 11.0 acres of SMC in excess of the requirement. The biology report acknowledges this, stating further that the... "Excess acreage can be preserved onsite to protect the ecosystem functioning of the onsite wildlife corridor". It does not address the specific mitigation ratio other than saying that the mitigation requirement at 1:1 is 1.9 acres.

At this point, you wish to apply some of the excess 11.0 acres of SMC to alleviate the problem with dirt disposal associated with your project currently under development. To that end, you would apply 5.5 acres of the excess 11.0 acres to mitigate impacts to 5.5 acres of SMC currently present on the 6-acre parcel that was created concurrent with your use permit. This again represents a 1:1 ratio for impacts to SMC currently present on the 6-acre parcel.

The 6-acre parcel also supports approximately 1.5 acres of Coastal Scrub (CSS). Because impacts to this habitat-type are fully regulated in concurrence with the Wildlife Agencies, I recommend that you fence and avoid the CSS entirely until such time as you wish to pursue a Habitat Loss Permit (HLP) to cover the loss. This is a small patch of vegetation of low biological resource value that you may wish to remove at some time in the future. By not impacting this CSS habitat at this time, you can avoid a need for the HLP until such time as you decide to go forward.

The issue of wetlands/waters on the 6-acre parcel has been addressed by the project's Civil Engineer. He demonstrated that the drainages on the northern end of the 6-acre parcel were hydrologically cut-off from their drainage basins by construction of Interstate Highway 15 many decades ago. These features apparently no longer receive flow from the surrounding basin but remain as incised erosional features. None of these areas qualify as County Resource Protection Ordinance (RPO) wetlands.

Please let me know if you have questions.

Attachment B

Haul Route/Traffic Control Plan dated 29 October 2019

Darnell & ASSOCIATES
TRANSPORTATION PLANNING & TRAFFIC ENGINEERING

October 29, 2019

Neil Kadakia
Greens Global, Greens Real Estate
910 South El Camino Real, Suite A;
San Clemente, CA 92672

D&A No; 180304

Subject: Greens Storage Escondido Project - Haul Route

Dear: Mr. Kadakia,

In accordance with your authorization, we have worked with Mr. Wunderlin to prepare this letter report addressing the traffic requirements of exporting 54,000 cubic yards of material from the Greens Storage Project to an adjacent site to the north of the project site. Figure 1 is a map showing the project site and adjacent import site. Due to existing constraints the project proposes a temporary access to North Centre Parkway and a temporary access to the adjacent import site as shown on Figure 1. Due to sensitive and environmental issues, direct access to/from each site is restricted and requires access to each site be directly to/from North Centre City Parkway. The two (2) temporary access drives are presented on Figure 1.

It is estimated that 24 truck trips per hour will occur based on traffic control staging to move three (3) loaded and empty units every 15 minutes, generating 192 daily truck loads to the export site and 197 empty truck trips back to the project site. The twelve (12) trucks per hour is proposed to be controlled by staging three (3) loaded in a staging area adjacent to the proposed export site access and three (3) empty trucks in the staging area at the import site and controlling the movement of the trucks to enter North Centre City Parkway every 15 minutes. The operation is estimated to require North Centre City Parkway traffic to be stopped for approximately 5 minutes for every 15 minutes for loaded and empty trucks to enter and leave North Centre City Parkway and travel between the proposed access driveways.

To safely accommodate the haul route, we have prepared Drawings No.'s T-1 and T-2 showing the traffic control requirements. It should be noted the plan proposes that a staging area be provided at each site to control up to three (3) tandem truck units and to stage their entrance into North Centre City Parkway to occur at the same time traveling in opposite directions an controlled by flagmen with radio controls to stop North Centre City Parkway traffic.

The recommended traffic control plans are attached. Approval of the Haul Route Permit will include conditions of approval for cleaning and maintenance of the Haul Route as needed. The haul route permit includes the submittal of the attached traffic control plan showing the haul route and recommended traffic control signage with this letter report.

Please call if you have any questions or need additional information.

Sincerely,

DARNELL & ASSOCIATES,

Billy Everette Darnell

Billy E. Darnell, P.E.
RCE: 22338

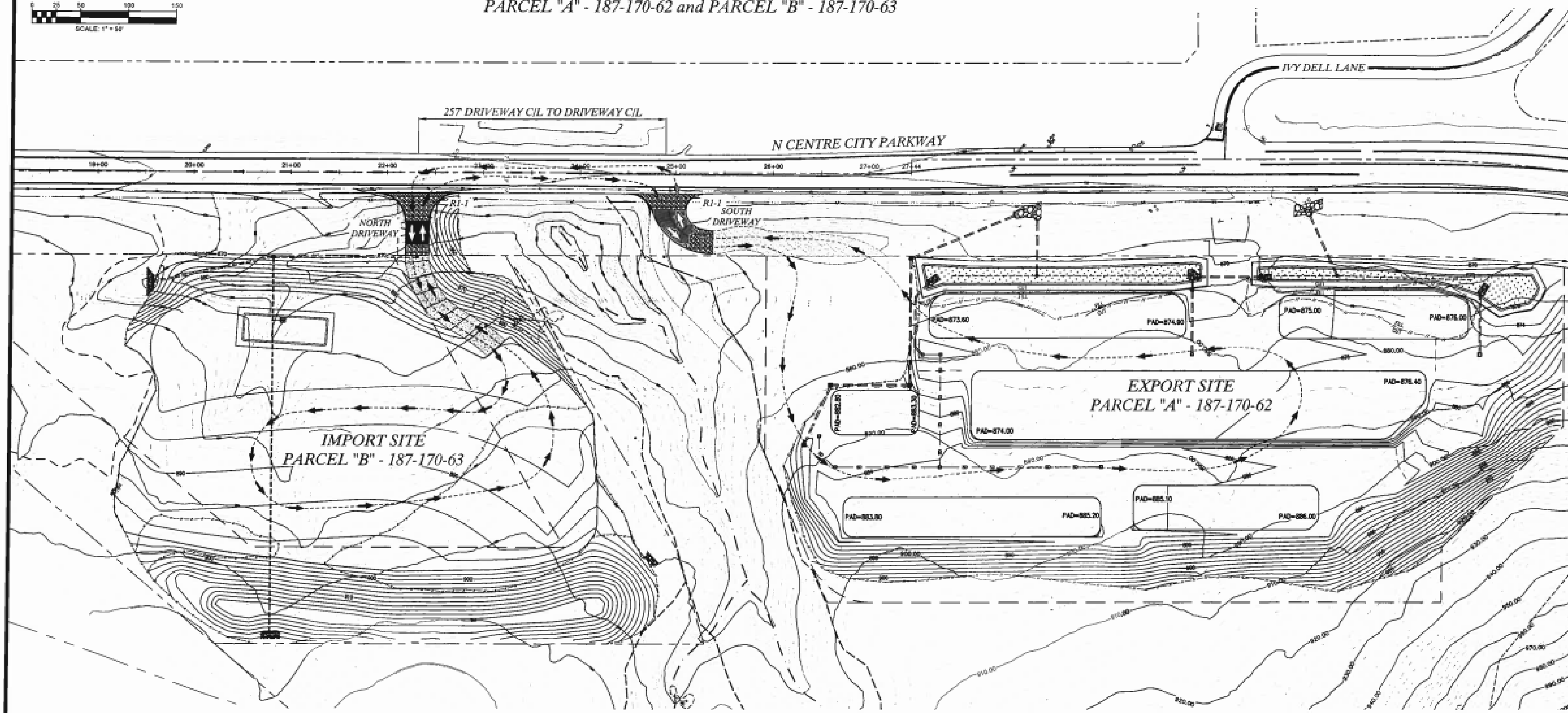
REGISTERED PROFESSIONAL ENGINEER
BILLY EVERETTE DARNELL
No. 22338
CIVIL
STATE OF CALIFORNIA

BED/jam
180304 - Escondido Storage Haul Route_OCT 2019

HAUL ROUTE ACCESS & CIRCULATION PLAN
FOR GREENS STORAGE, ESCONDIDO, CA
NORTH CENTRE CITY PARKWAY

PARCEL "A" - 187-170-62 and PARCEL "B" - 187-170-63

- *Total Length of HAUL ROUTE--3,000 ft*
- *Length of HAUL ROUTE in Public Right of Way----------300 ft each direction*
- *Hauling Equipment---Two Peterbilt Bottom Dump Trucks or equivalent, 40 c.y.*
- *Loading Equipment---------Caterpillar 980 Loader or equivalent, 7.2 c.y. bucket*
- *Time duration per Cycle----------------------------------25 minutes, 20 cycles per day*
- *Time duration in the Public Right of Way-----------------1 minute each direction*
- *Soil Hauled per day---1,500 c.y.*
- *Total Soil to be Hauled---55,000 c.y.*
- *Total Time Required--40 days*



CLIENT:
WUNDERLIN ENGINEERING
PO BOX 461300
Escondido, CA 92046
Office 760-644-2944
Email wunderlin@earthlink.com

ENGINEER'S SEAL	ENGINEER'S INFORMATION	SCALE	COUNTY OF SAN DIEGO	FIGURE NO.
No. 22158 STATE OF CALIFORNIA CIVIL	[signature] 10/29/2019 DATE Darnell & ASSOCIATES, INC.	1" = 50' WARNING: IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE	TRAFFIC ENGINEERING DEPARTMENT HAUL ROUTE CIRCULATION EXHIBIT FOR GREENS STORAGE, ESCONDIDO, CA NORTH CENTRE PARKWAY NORTH OF IVY DELL LANE	1 SHEET 1 OF 3 SHEETS

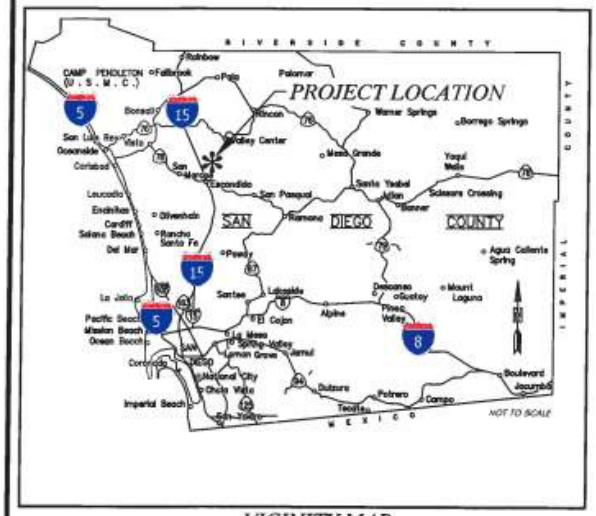
REF: GRADING PERMIT NO. PDS2016-LDGRMJ-30062

DIGALERT
Call: TOLL FREE
1-800-227-2600
AT LEAST TWO DAYS BEFORE YOU DIG

PRIVATE CONTRACT

HAUL ROUTE & TRAFFIC CONTROL
FOR GREENS STORAGE, ESCONDIDO, CA
NORTH CENTRE CITY PARKWAY

PARCEL "A" - 187-170-62 and PARCEL "B" - 187-170-63



VICINITY MAP
NOT TO SCALE

COUNTY OF SAN DIEGO TRAFFIC CONTROL NOTES

VALIDATION: THIS TRAFFIC CONTROL PLAN IS NOT VALID UNTIL WORK DATES, WORK HOURS, AND THE ATTACHED TRAFFIC CONTROL PLANS ARE APPROVED BY THE COUNTY OF SAN DIEGO. AN APPROVED COUNTY OF SAN DIEGO ENCROACHMENT PERMIT SHALL BE PROVIDED TO THE CONTRACTOR ONCE THE ABOVE REQUIREMENTS ARE FULFILLED.

STANDARDS: THE TRAFFIC CONTROL PLAN SHALL CONFORM TO THE MOST RECENT ADOPTED EDITION OF EACH OF THE FOLLOWING MANUALS:

A. CALIFORNIA MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAYS; MARCH 29, 2019 EDITION
B. TEMPORARY TRAFFIC CONTROL DEVICES WITHIN CALTRANS RIGHT OF WAY SHALL BE IN ACCORDANCE WITH CALTRANS 2018 REVISED STANDARD PLANS RSP T9 THROUGH RSP T14

NOTIFICATIONS: THE CONTRACTOR SHALL NOTIFY THE FOLLOWING AFFECTED AGENCIES A MINIMUM OF FIVE (5) WORKING DAYS PRIOR TO ANY EXCAVATION, CONSTRUCTION, OR TRAFFIC CONTROL:

·CAL FIRE - SAN DIEGO UNIT STATION 22	*(ANY ROW EXCAVATION)*	*(619) 661-2820*
·SAN DIEGO COUNTY SHERIFF'S DEPT.	*(ANY ROW EXCAVATION)*	*(619) 210-0334*
·SAN DIEGO CNTY TRAFFIC ENG. DEPT.	*(TRAFFIC SIGNALS)*	*(858) 694-3650*
· SAN DIEGO TRANSIT DEPT.	*(BUS STOPS AFFECTED)*	*(619) 238-0100 x6451*
· UNDERGROUND SERVICE ALERT	*(ANY EXCAVATION)*	*(800) 422-4133*

EXCAVATIONS: EXCEPT AS SHOWN ON THE PLANS, TRENCHES SHALL BE BACKFILLED OR TRENCH-PLATED AT THE END OF EACH WORKDAY. AN ASPHALT RAMP SHALL BE PLACED AROUND EACH TRENCH PLATE TO PREVENT THE PLATE FROM BEING DISLODGED. UPON COMPLETION OF EXCAVATION BACKFILL, THE CONTRACTOR SHALL PROVIDE A SATISFACTORY SURFACE FOR TRAFFIC. WHEN CONSTRUCTION OPERATIONS ARE NOT ACTIVELY IN PROGRESS, THE CONTRACTOR SHALL MAINTAIN ALL TRAVEL LANES OPEN TO TRAFFIC , EXCEPT AS SHOWN ON THE PLANS.

RESTORATION OF ROADWAY: THE CONTRACTOR SHALL REPAIR OR REPLACE ALL EXISTING IMPROVEMENTS WITHIN THE RIGHT-OF-WAY NOT DESIGNATED FOR PERMANENT REMOVAL (TRAFFIC SIGNS, STRIPING, PAVEMENT MARKERS, PAVEMENT MARKINGS, LEGENDS, CURB MARKINGS, LOOP DETECTORS, TRAFFIC SIGNAL EQUIPMENT, ETC.) WHICH ARE DAMAGED OR REMOVED AS A RESULT OF OPERATIONS. REPAIRS AND REPLACEMENTS SHALL BE AT LEAST EQUAL TO EXISTING IMPROVEMENT.

CHANGES IN WORK: THE RESIDENT ENGINEER WILL OBSERVE THESE TRAFFIC CONTROL PLANS IN OPERATION AND RESERVES THE RIGHT TO MAKE CHANGES AS THE FIELD CONDITIONS WARRANT. SUCH CHANGES SHALL SUPERSEDE THESE PLANS.

LOCATION MAP
NOT TO SCALE

SHEET LIST FOR HAUL ROUTE & TRAFFIC CONTROL PLANS IN SUPPORT OF GRADING OPERATIONS FOR GREENS STORAGE

STAGE	*SHEET*	*DESCRIPTION OF WORK TO BE ACCOMPLISHED*
N/A	*1*	*PARCEL MAPS WITH PROPOSED HAUL ROUTE CIRCULATION*
N/A	*2*	*TITLE SHEET WITH TRAFFIC CONTROL NOTES, LEGEND, VICINITY MAP, PROJECT LOCATION MAP, & SHEET LIST*
1	*3*	*TRAFFIC CONTROL PLAN SET FOR EXECUTION OF HAUL ROUTE DURING WORKING HOURS.*

LEGEND

- *FLAGGER WITH C28(CA) PADDLE*
- *TRAFFIC SIGN*
- *TRAFFIC DIRECTION*
- *HIGH VISIBILITY WARNING FLAGS*
- *CONES / DELINEATORS*

CLIENT:
WUNDERLIN ENGINEERING
PO BOX 461300
Escondido, CA 92046
Office 760-644-2944
Email wunderlin@earthlink.com

ENGINEER'S SEAL

ENGINEER'S INFORMATION
10/29/2019
DATE
DESIGN ENGINEER R.C.E. No. 22588
LICENSE EXPIRES 9-30-21
Darnell & ASSOCIATES, INC.

SCALE
1" = 40'
WARNING
IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE

COUNTY OF SAN DIEGO
TRAFFIC ENGINEERING DEPARTMENT
TRAFFIC CONTROL PLANS
FOR
GREENS STORAGE, ESCONDIDO, CA
NORTH CENTRE PARKWAY NORTH OF IVY DELL LANE

DRAWING NO.
T-1
SHEET 2 OF 3 SHEETS

REF: GRADING PERMIT NO. PDS2016-LDGRMJ-30062

VINCENT N. SCHEIDT

Biological Consultant

3158 Occidental Street • San Diego, CA • 92122-3205 • 858-457-3873 • 858-336-7106 cell • email: vince.scheidt@gmail.com

Memorandum

To: Dr. Raj Kadakia

From: Vince Scheidt, Consulting Biologist

Date: August 29, 2019

RE: Comments on Mitigation; Escondido Mini-Storage Project, PDS2005-3910-0508031

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The 6-acre parcel also supports approximately 1.5 acres of Coastal Scrub (CSS). Because impacts to this habitat-type are fully regulated in concurrence with the Wildlife Agencies, I recommend that you fence and avoid the CSS entirely until such time as you wish to pursue a Habitat Loss Permit (HLP) to cover the loss. This is a small patch of vegetation of low biological resource value that you may wish to remove at some time in the future. By not impacting this CSS habitat at this time, you can avoid a need for the HLP until such time as you decide to go forward.

The issue of wetlands/waters on the 6-acre parcel has been addressed by the project's Civil Engineer. He demonstrated that the drainages on the northern end of the 6-acre parcel were hydrologically cut-off from their drainage basins by construction of Interstate Highway 15 many decades ago. These features apparently no longer receive flow from the surrounding basin but remain as incised erosional features. None of these areas qualify as County Resource Protection Ordinance (RPO) wetlands.

Please let me know if you have questions.

VINCENT N. SCHEIDT

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Memorandum

To: Dr. Raj Kadakia, Greens Escondido LLC

From: Vince Scheidt, Consulting Biologist

Date: March 10, 2020

RE: Comments on Coastal Scrub and Non-native Grassland on the 6-acre "Parcel A"

In response to your recent request, I have reevaluated the acreage on the northern end of the approximately 6-acre T&R Storage "Parcel A" project site. As you know, this parcel supports primarily Southern Mixed Chaparral, but it also supports approximately 1.5 acres of Coastal Scrub (CSS) and (formerly) 0.1 acres of Non-native Grassland (NNG). As discussed in my updated biology report (2019), the Coastal Scrub in this location can be subdivided into various subcategories, including Mixed Scrub (Holland Code 32000), Isocoma Scrub (Holland Code 32000), and Coastal Sage - Chaparral Scrub (Holland Code 32500). These more-or-less discrete habitats are dominated by soft-woody shrubs species, including Laurel Sumac *(Malosma laurina)*, Black Sage *(Salvia mellifera)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, and Isocoma *(Isocoma menziesii)*. For impact analysis purposes, these coastal scrub variants are considered CSS. The small patch of NNG has recruited with CSS species since the original study (2001-2007) and should be considered a part of that habitat type at this time. Thus, the total CSS on "Parcel A" is 1.6 acres.

This patch of vegetation is of low biological resource value for the following reasons:

1. It is effectively surrounded by development
2. It is clearly successional from the original mixed chaparral
3. It is fragmented
4. It is of small patch size

In my professional opinion, the loss of this small patch would not be considered a regionally-significant non-mitigable impact. The vegetation is of low value and does not show any evidence of supporting significant populations of sensitive species.

Please let me know if you have questions.

VINCENT N. SCHEIDT

Biological Consultant

3158 Occidental Street • San Diego, CA • 92122-3205 • 858-457-3873 • 858-336-7106 cell • email: vince.scheidt@gmail.com

Memorandum

To: Dr. Raj Kadakia, Greens Escondido LLC

From: Vince Scheidt, Consulting Biologist

Date: Revised December 3, 2020

RE: Status of 1.6 acre patch of Coastal Scrub on the 6-acre Greens Escondido "Parcel A"

As follow-up to our recent conference call regarding the use of the northern end of your approximately 6-acre Greens Escondido "Parcel A" property, I am providing a chronology of biological studies that have brought the project to this point of administrative processing. As you know, "Parcel A" (now APN 187-170-62) was formerly a part of APN 187-170-63 but separated via a Boundary Adjustment during approval of the Major Use Permit (MUP) for your storage facility development project, currently under construction.

1. The first studies of APN 187-170-63, including "Parcel A", took place in 2001. This work was completed by TERACOR Resource Management, and it included a focused survey for California Gnatcatcher *(Polioptila californica)*. The survey resulted in negative findings as no gnatcatchers were detected.
2. A second round of gnatcatcher surveys was completed in 2007, again by TERACOR as an update to their earlier work. This survey was again negative. Both the 2001 and the 2007 surveys covered the "northern portion", which included the 1.6-acre patch of CSS on "Parcel A".
3. Most recently, a third gnatcatcher survey was completed by Mrs. Robin Church of RC Biological Consulting in 2012. This, too, was negative. Per the County's directive, this survey was focused on the central development area only, and it therefore did not include the CSS on "Parcel A".

To the best of my knowledge, California Gnatcatchers have never been detected on or adjacent to this property. Two of the three gnatcatcher surveys included the 6-acre "Parcel A" because a 1.5+ acre segment of this parcel had been mapped as supporting Coastal Sage Scrub (CSS) since 2001.

4. Your MUP was issued on by the County April 11, 2014, and a Habitat Loss Permit (HLP) was issued by the County on April 10, 2018. Following the issuance of these permits, the development site was cleared and graded, producing a large amount of rock and soil for export from the development area.
5. In August of 2019, I prepared and you submitted a memorandum to the County discussing the nature of the vegetation on "Parcel A", which was being considered to receive the excessive export. The memorandum discussed how excess (unassigned) onsite habitat acreage could compensate for impacts to the Southern Mixed Chaparral vegetation that was covering the majority of that parcel.
6. In order to support that conclusion, in October of 2019, I updated the biology report for your MUP to specifically address habitat impacts on "Parcel A".
7. You received authorization to move dirt and rocks onto the southern portion of "Parcel A" last year and commenced doing so shortly thereafter. I understand that the material moved onto "Parcel A" was properly graded and compacted, with subsoil drains, hydroseeding, erosion control, etc. put into place to stabilize the site.

Prior to moving any material, the northern end of the "Parcel A" was fenced and completely avoided during the placement of rock and dirt on the more southerly areas of the parcel. This left an approximately 1.6-acre left patch of Coastal Sage Scrub (CSS) vegetation that has become of significantly lowered biological resource value for the following reasons:

1. The CSS is now effectively surrounded by development:
    a. The placement of soil and rock on the southern portion of Parcel "A" eliminated the last open connection to the south. This is a change in circumstances from the October 2019 biological resources update report.
    b. To the east is a new waterline in the North Centre City Parkway right-of-way, with developed lands beyond that. The waterline and associated improvements were not present in October 2019, which is another change in circumstances.
    c. To the west is I-15.
    d. To the north is a telecommunications structure, a driveway, etc. followed by Mesa Rock Road. These all represent development.
2. The CSS is clearly successional from the original SMC, which was the climax community formerly covering this area prior to the construction of I-15.
3. The CSS is fragmented (no connectivity to any substantial areas of similar habitat).
4. The CSS is of small patch size (1.6 acres).

At this time, I understand that an excessive amount of dirt and rock is present on "Parcel A", with elevations well above the anticipated final grade and presenting a threat to the riparian habitat within the onsite open space easement. This is because any significant amount of precipitation during the upcoming rainy season could see material slough into the watercourse, which is located far below the face of the new slope. I understand the 23-acre open space easement on the subject MUP property is still owned by Greens Escondido, and that you are responsible for maintaining and protecting all of the habitat within this 23-acre area. This includes the habitat within the onsite drainage, 100% of which is in open space.

In my professional opinion, the loss of this patch of CSS would not be considered a regionally-significant non-mitigable impact. The vegetation is of limited value and does not show any evidence of supporting significant populations of sensitive species. As I had suggested previously, the applicant would be willing to mitigate the loss of this 1.6 acres of CSS as follows:

1. Utilize some of the excess SMC that is currently in dedicated open space at a 3:1 ratio. The dedicated open space easement has an excess of 5.5 acres of SMC, which is habitat that was in excess of what was required for impacts to date. Mitigating the patch at 3:1 would consume an additional 4.8 acres of the SMC habitat already protected. This is "out of kind" but at a higher mitigation ratio than normal for CSS. This is based on the low biological resource value of the CSS, the much higher biological resource value of the SMC, and the fact that it is successional to SMC regardless.

2. Should the use of SMC be not be an acceptable alternative, the County should consider a procedure to bond for 150% of the offsite CSS mitigation costs thus guaranteeing that the CSS will be mitigated and not delay the shifting of the dirt and rock to protect the riparian area during future rain events.

Please let me know if you have questions. Thanks for your consideration of these matters.