



County of San Diego

PLANNING & DEVELOPMENT SERVICES
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(858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

DAHVIA LYNCH
DIRECTOR

DATE (To be determined)

Greens Escondido, LLC
910 S. El Camino Real, Suite A
San Clemente, CA 92672

DRAFT **Habitat Loss Permit**

APPLICATION NUMBER: HLP 22-002
ASSOCIATED PERMIT(S): PDS2016-LDGRMJ-30062
NAME OF APPLICANT: Greens Escondido, LLC

DESCRIPTION/LOCATION OF LOSS:

The proposed project is for a Habitat Loss Permit and will remove 1.1 acres of coastal sage scrub associated with the Greens Storage Escondido Grading Permit (PDS2016-LDGRMJ-30062), as shown on the attached Habitat Loss Exhibit dated September 22, 2022. The proposed project is located between Interstate 15 and North Centre City Parkway in the North County Metropolitan Subregional Plan Area within unincorporated San Diego County as indicated on the attached USGS map.

The grading permit for the Greens Storage Escondido project was issued on August 17, 2018, and the mini-storage buildings and infrastructure on the southern parcel are nearing completion. The soil moved from the southern parcel is proposed to be stored within a 1.1-acre area containing coastal sage scrub that was not previously included in the grading plans.

Biological resources on the project site were previously evaluated in a Summary Biology Report prepared by Vince Scheidt (March 2013). An updated survey of the project site was completed on August 10 and September 12, 2022 (Everett and Associates, September 2022). The conditions observed during the 2022 site visits were identical to those reported in 2013. No sensitive plant or wildlife species were observed. Protocol surveys for the coastal California gnatcatcher were performed in 2001 and 2007 and were updated in 2012 with negative results.

The Diegan coastal sage scrub habitat is considered to be of Intermediate Quality as determined by the criteria established under the Natural Community Conservation Planning (NCCP) Logic Flow Chart. Mitigation will occur through the offsite purchase of 1.1 acres (1:1 ratio) of Diegan coastal sage scrub within a County approved mitigation bank. Therefore, impacts would be mitigated to a level below significance. The proposed project is in conformance with all standards and guidelines outlined in the NCCP Process Guidelines.

DECISION:

The Director of Planning & Development Services has approved your application for a HABITAT LOSS PERMIT. This Habitat Loss Permit approval does not become final until both the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) concur with the Director's approval, by the either of the following:

1. Concurrence implied by allowing a 30-day period, initiated by their receipt of this decision, to lapse without presenting written notification to the County that the decision is inconsistent with the Southern California Coastal Sage Scrub (CSS) Natural Community Conservation Planning (NCCP) Process Guidelines (CDFW, November 1993) or any approved subregional mitigation guidelines; or
2. Granting concurrence through written notification to the County prior to the conclusion of the 30-day period, initiated by their receipt of this decision, that the project is consistent with the Southern California CSS NCCP Process Guidelines or any approved subregional mitigation guidelines.

Pending the issuance of an associated Grading Permit, Clearing Permit or Improvement Plan from the County of San Diego, this Habitat Loss Permit allows for the loss of the above-described coastal sage scrub habitat (see attached Habitat Loss Exhibit) and incidental take of the California gnatcatcher for a period of one calendar year commencing the day concurrence is given by both the USFWS and CDFW. If the loss of habitat, as authorized by this Habitat Loss Permit, has not occurred within this one-year period, this Habitat Loss Permit and the authorization for the loss of coastal sage scrub habitat expires.

This Habitat Loss Permit cannot be relied upon for the clearing, grading or removal of any vegetation until a valid Grading Permit, Clearing Permit or Improvement Plan has been issued from the County of San Diego authorizing such vegetation removal. Furthermore, use and reliance upon this Habitat Loss Permit cannot occur until all of the requirements as specified within the "Conditions of Approval" section of this permit have been satisfied.

CONDITIONS OF APPROVAL:

- A. Prior to use and reliance on this Habitat Loss Permit, the following conditions shall be met:

BIO#1–OFFSITE MITIGATION [PDS, FEE X2]

INTENT: In order to mitigate for the impacts to coastal sage scrub, which is a sensitive biological resource pursuant to the County's Guidelines for Determining Significance for Biological Resources, offsite mitigation shall be acquired. **DESCRIPTION OF**

REQUIREMENT: The applicant shall purchase habitat credit or provide for the conservation of habitat of 1.1 acres of coastal sage scrub, located at a County approved mitigation bank as indicated below:

- a. **Option 1:** If purchasing Mitigation Credit, the mitigation bank shall be approved by the California Department of Fish & Wildlife. The following evidence of purchase shall include the following information to be provided by the mitigation bank:
 1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.
 2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.
 3. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
 4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by this project and the amount remaining after utilization by this project.
- b. **Option 2:** If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the conservation habitat of the same amount and type of land located in North San Diego County as indicated below:
 1. Prior to purchasing the land for the proposed mitigation, the location should be pre-approved by [PDS].
 2. A Resource Management Plan (RMP) shall be prepared and approved pursuant to the County of San Diego Biological Report Format and Content Requirements to the satisfaction of the Director of PDS. If the offsite mitigation is proposed to be managed by DPR, the RMP shall also be prepared and approved to the satisfaction of the Director of DPR.
 3. An open space easement over the land shall be dedicated to the County of San Diego or like agency to the satisfaction of the Director of PDS. The land shall be protected in perpetuity.
 4. The purchase and dedication of the land and the selection of the Resource Manager and establishment of an endowment to ensure funding of annual ongoing basic stewardship costs shall be complete prior to the approval of the RMP.
 5. In lieu of providing a private habitat manager, the applicant may contract with a federal, state, or local government agency with the primary mission of resource management to take fee title and manage the mitigation land). Evidence of satisfaction must include a copy of the contract with the agency, and a written statement from the agency that (1) the land contains the specified acreage and the specified habitat, or like functioning habitat, and (2) the land will be managed by the agency for conservation of natural resources in perpetuity.

DOCUMENTATION: The applicant shall purchase the offsite mitigation credits and provide the evidence to the [PDS, PCC] for review and approval. If the offsite mitigation

is proposed to be owned or managed by DPR, the applicant must provide evidence to the [PDS PCC] that [DPR, GPM] agrees to this proposal. It is recommended that the applicant submit the mitigation proposal to the [PDS, PCC], for a pre-approval. If an RMP is going to be submitted in-lieu of purchasing credits, then the RMP shall be prepared and an application for the RMP shall be submitted to the [PDS, ZONING]. **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the mitigation shall occur. **MONITORING:** The [PDS, PCC] shall review the mitigation purchase for compliance with this condition. Upon request from the applicant [PDS, PCC] can pre-approve the location and type of mitigation only. The credits shall be purchased before the requirement can be completed. If the applicant chooses option #2, then the [PDS, ZONING] shall accept an application for an RMP, and [PDS, PPD] [DPR, GPM] shall review the RMP submittal for compliance with this condition and the RMP Guidelines.

- B. Prior to use and reliance on this permit the following conditions shall be placed on the face of all future grading permits or improvement plans:

BIO#2-TEMPORARY ORANGE FENCING [PDS, FEE]

INTENT: In order to prevent inadvertent disturbance to areas outside the limits of grading, temporary construction fencing shall be installed. **DESCRIPTION OF REQUIREMENT:** Prior to the commencement of any grading and/or clearing in association with this grading plan, temporary orange construction fencing shall be placed to protect from inadvertent disturbance of all open space easements that do not allow grading, brushing, or clearing. Temporary fencing is also required in all locations of the project where proposed grading or clearing is within 100 feet of an open space easement boundary. The placement of such fencing shall be approved by the PDS, Permit Compliance Section. Upon approval, the fencing shall remain in place until the conclusion of grading activities after which the fencing shall be removed. **DOCUMENTATION:** The applicant shall provide evidence that the fencing has been installed and have a California licensed surveyor certify that the fencing is located on the boundary of the open space easement. The applicant shall submit photos of the fencing along with the certification letter to the [PDS, PCC] for approval. **TIMING:** Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances the fencing shall be installed, and shall remain for the duration of the grading and clearing. **MONITORING:** The [PDS, PCC] shall either attend the preconstruction conference and approve the installation of the temporary fencing, or review the certification and pictures provided by the applicant.

ENVIRONMENTAL FINDINGS:

- A. CEQA Findings

This project complies with the California Environmental Quality Act (CEQA) and state and County CEQA guidelines because the project has completed a Mitigated Negative Declaration dated April 11, 2014, and Addendum to the previously adopted Mitigated Negative Declaration dated ___, on file with the Planning & Development Services as Environmental Review No. PDS2005-3910-0508031 and ___.

- B. FINDINGS MADE IN SUPPORT OF THE ISSUANCE OF THE HABITAT LOSS PERMIT:

The following findings are made based upon all of the documents contained in the record for this project, and pursuant to Section 86.104 of County of San Diego Ordinance No. 8365 (N.S.) and Section 4.2.g of the CSS NCCP Process Guidelines (CDFW, November 1993):

Finding 1.a: The habitat loss does not exceed the five percent guideline.

The proposed project will impact 1.1 acres of coastal sage scrub and no pairs of California gnatcatcher (*Poliophtia californica*). Approved coastal sage scrub losses as of the date of December 15, 2022 and including this approval, for the entire unincorporated County, outside the boundaries of the Multiple Species Conservation Program (MSCP), are presented in the following table:

Unincorporated Area Coastal Sage Scrub Cumulative Losses	
Total loss allowed under five percent guideline:	2953.30 acres
Cumulative loss of Coastal sage scrub to date:	1303.51 acres
Net loss due to this project:	1.1 acres
Total cumulative loss:	1304.61 acres
Remaining loss under five percent guideline:	1648.70 acres

Finding 1.b: The habitat loss will not preclude connectivity between areas of high habitat values.

The County habitat evaluation model ranks the impact area as medium and high value. The project falls entirely within the "I-15 corridor", an area of known passage for species such as the coastal California gnatcatcher and others that move along the fragmented archipelago of Diegan coastal sage scrub and other habitats from Escondido, north to Riverside County. The structure of the archipelago consists of mostly disjunct patches or fragments of habitat that are located within a mile of one another in a generally north-south direction. The proposed impact will not preclude the use of this area for movement of species through the "I-15 corridor" as it will occur adjacent to existing disturbance and will leave the adjacent open space intact. Therefore, the habitat loss will not preclude movement corridors or habitat linkages between areas of high value habitats.

Finding 1.c: The habitat loss will not preclude or prevent the preparation of the subregional NCCP.

The Diegan coastal sage scrub habitat onsite is identified for conservation, as Pre-Approved Mitigation Area (PAMA) land in the draft North County Multiple Species Conservation Program (NCMSCP). Implementation of project will not adversely affect the ongoing MSCP planning process. The project will impact a small area adjacent to existing development and leave the adjacent opens space intact. Therefore, the habitat loss will not preclude the development of a regional preserve system.

Finding 1.d: The habitat loss has been minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the NCCP Process Guidelines.

A total of 1.1 acres of Diegan coastal sage scrub habitat will be impacted by the project. The habitat is considered of “intermediate” value, pursuant to the NCCP Logic Flow Chart. The project has been designed to impact an area adjacent to existing development and leave the adjacent opens space intact. The project will also purchase offsite mitigation for impacts to Diegan coastal sage scrub. Therefore, the loss of Diegan coastal sage scrub has been minimized and mitigated to the maximum extent practicable for intermediate value habitat in accordance with Section 4.3 the NCCP Process Guidelines.

Finding 2 The habitat loss will not appreciably reduce the likelihood of survival and recovery of listed species in the wild.

Protocol surveys for the California gnatcatcher were performed in 2001 and 2007 and were updated in 2012 with negative results. No sensitive plant or wildlife species were observed during the September 12, 2022 site visit. To mitigate for the loss of coastal sage scrub habitat due to the project, offsite purchase of coastal sage habitat will be required at a 1:1 ratio. The offsite habitat purchase will preserve habitat with long-term viability that has connectivity to high value districts and potential to support listed species. Through this mitigation measure, the proposed development of the project site will not appreciably reduce the likelihood of the survival and recovery of listed species.

Finding 3: The habitat loss is incidental to otherwise lawful activities.

The project will require grading plans for the proposed grading. The issuance of a Habitat Loss Permit by the County of San Diego, with the concurrence of the Department of Fish and Wildlife and U.S. Fish and Wildlife Service and approval by the County of San Diego of a Grading Permit, Clearing Permit, or Improvement Plan is required prior to the clearing of any coastal sage scrub supported on the project site. No state or federal permits are identified as being required at this time. Construction and/or land use modification will not commence until all appropriate permits have been issued. The project has been found to be in conformance with Section 86.104 of the San Diego County Code. As such, the anticipated loss will be incidental to “otherwise lawful activities”.

NCCP FLOWCHART

1. Is natural vegetation present? **Yes.**
2. Is Coastal sage scrub present? **Yes.**
3. Is Coastal sage scrub the most dense in the subregion? **No.**
4. Is the land close to high value district? **Yes.**
5. Is the land located in a corridor between higher value districts? **Yes.**
6. Does the land support high density of target species? **No.**

Based on the NCCP Logic Flow Chart, the quality of habitat supported on the Greens Storage project is defined as being “Intermediate Value.”

MITIGATION MONITORING AND REPORTING PROGRAM:

The following shall be the Mitigation Monitoring or Reporting Program for this Habitat Loss Permit:

Public Resources Code Section 21081.6 requires the County to adopt a mitigation reporting or monitoring program for any project that is approved on the basis of a mitigated Negative Declaration or an Environmental Impact Report for which findings are required under Section 21081(a)(1). The program must be adopted for the changes to a project which the County has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment. The program must be designed to ensure compliance during project implementation.

The mitigation monitoring program is comprised of all the environmental mitigation measures adopted for the project. The full requirements of the program (such as what is being monitored, method and frequency, who is responsible, and required time frames) are found within the individual project conditions. These conditions are referenced below by category under the mechanism which will be used to ensure compliance during project implementation.

- Subsequent Project Permits

Compliance with the following conditions is assured because specified subsequent permits or approvals required for this project will not be approved until the conditions have been satisfied:

BIO#1, BIO#2

- Enforcement

Compliance with the following conditions is assured because complaints of non-compliance may be provided by the public to the County which may then investigate the status of compliance and pursue enforcement:

N/A

- Ongoing Mitigation

Compliance with the following conditions is assured because County staff will monitor the on-going requirements and, if necessary, pursue the remedies specified in the project permit, the security agreement, or the mitigation monitoring agreement:

N/A

NOTICE: The issuance of this permit by the County of San Diego does not authorize the applicant for said permit to violate any federal, state, or county laws, ordinances, regulations, or policies, including but not limited to, the federal Endangered Species Act and any amendments thereto.

NOTIFICATION TO APPLICANT: Because your project has an effect on native biological resources, State law requires the payment (or proof of prior payment) of a \$2,548.00 (2022 fees) fee to the California Department of Fish and Wildlife for their review of the Mitigated Negative Declaration (Fish and Wildlife Code §711.4) and a \$50 administrative fee to the County (\$2,404.75 total). To comply with State law, the applicant must file the NOD and remit applicable fees within five (5) working days of the date of the project approval. Payment or sufficient proof

of prior payment to the County Clerk is required at the time of filing. Payment may be made with cash or by check/money order made payable to the "San Diego Recorder/Clerk". American Express, Discover, MasterCard, and Visa Debit card payments are also accepted at County Administration Center with a \$2.50 surcharge per transaction, and must be submitted to the Clerk at the time of filing the NOD.

JUDICIAL REVIEW TIME LIMITATIONS: The time within which judicial review of this decision must be sought is governed by Code of Civil Procedure Section 1094.6, which has been made applicable in the County of San Diego by San Diego County Code Section 11.120. Any petition or other paper seeking judicial review must be filed in the appropriate court not later than the 90th day following the date on which this decision becomes final; however, if within 10 days after the decision becomes final a request for the record of the proceedings is filed and the required deposit in an amount sufficient to cover the estimated cost of preparation of such record is timely deposited, the time within which such petition may be filed in court is extended to not later than the 30th day following the date on which the record is either personally delivered or mailed to the party, or the party's attorney of record. A written request for the preparation of the record of the proceedings shall be filed with the Director, Planning & Development Services, 5510 Overland Avenue, Suite 110, San Diego, California 92123.

The foregoing decision was approved by the Director of Planning & Development Services on date of decision. A copy of this decision, and the documentation supporting the decision, is on file in the Planning & Development Services office at 5510 Overland Avenue, Suite 110, San Diego, California.

PLANNING & DEVELOPMENT SERVICES
DAHVIA LYNCH, DIRECTOR

BY:

ASHLEY SMITH, Chief
Project Planning Division

DL:AS:kw

Attachments

Habitat Loss Exhibit dated September 22, 2022

USGS Map

Biological Assessment Memorandum (Everett and Associates, September 2022)

cc: To be provided at issuance of Habitat Loss Permit

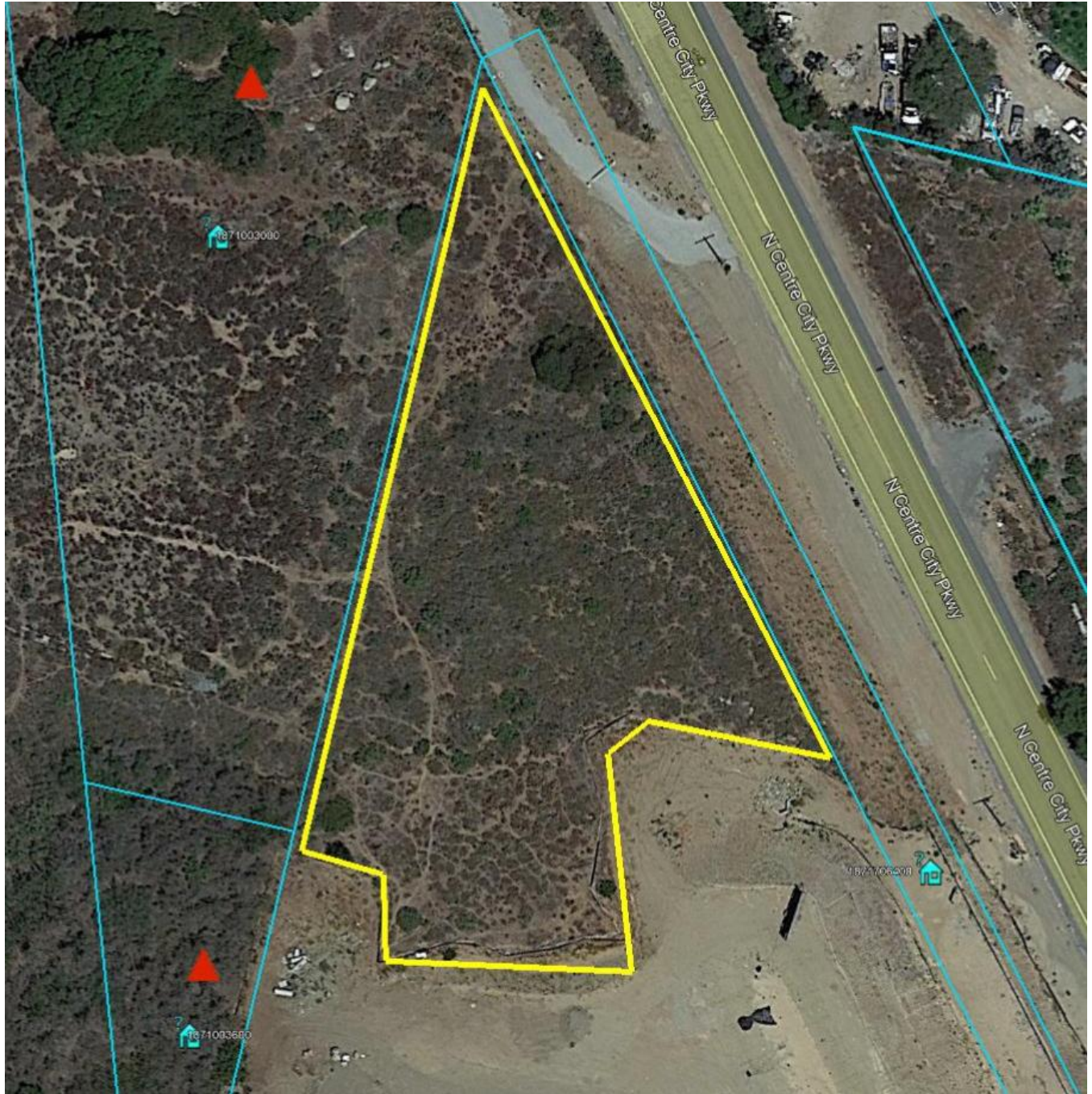
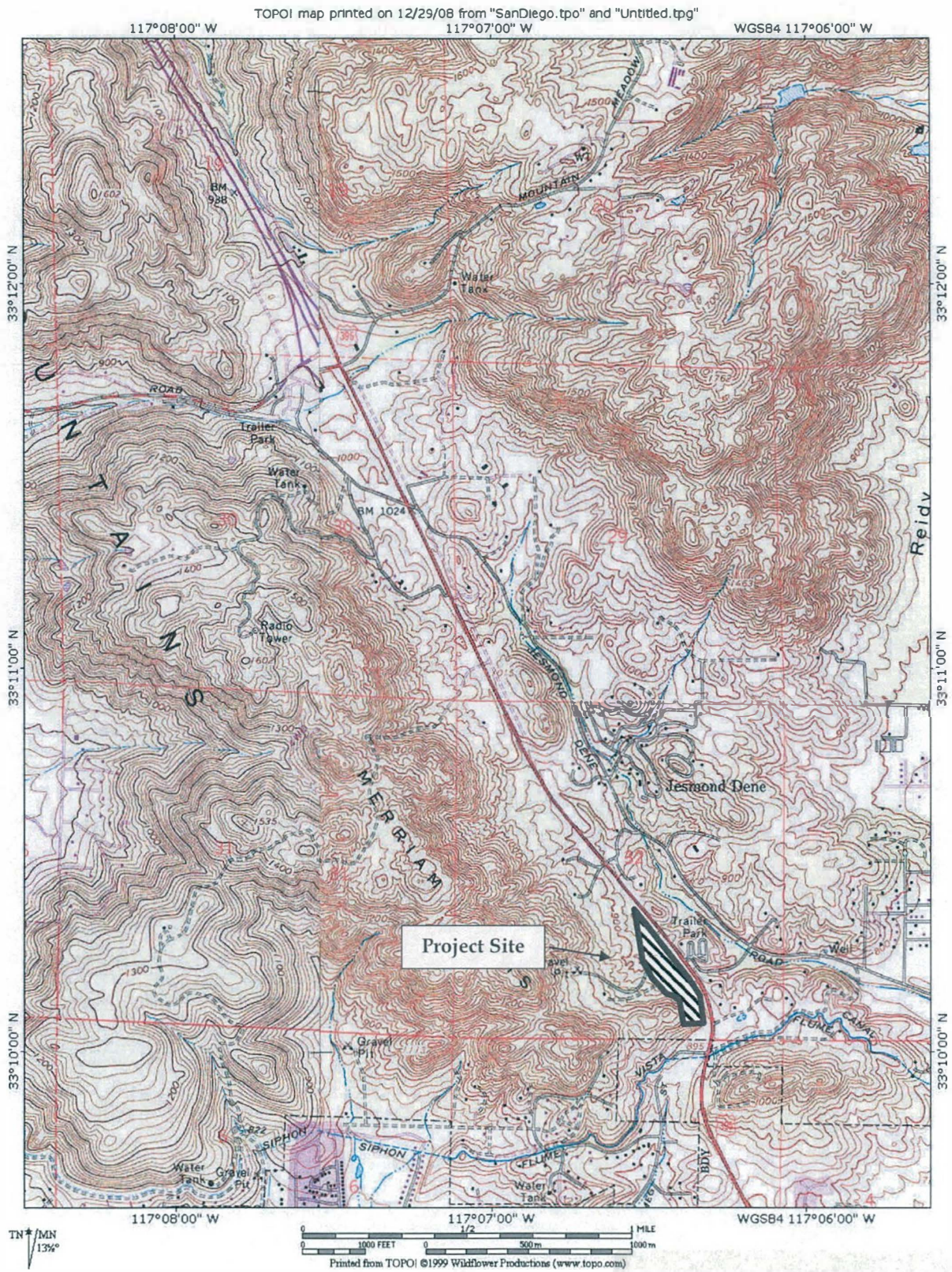


Figure 1. Area of CSS to be impacted ~1.1 Acres

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



SDC PDS RSVD 10-13-22

HLP22-002

EVERETT AND ASSOCIATES
ENVIRONMENTAL CONSULTANTS

ESTABLISHED IN 1975

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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 *Poliophtila 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).

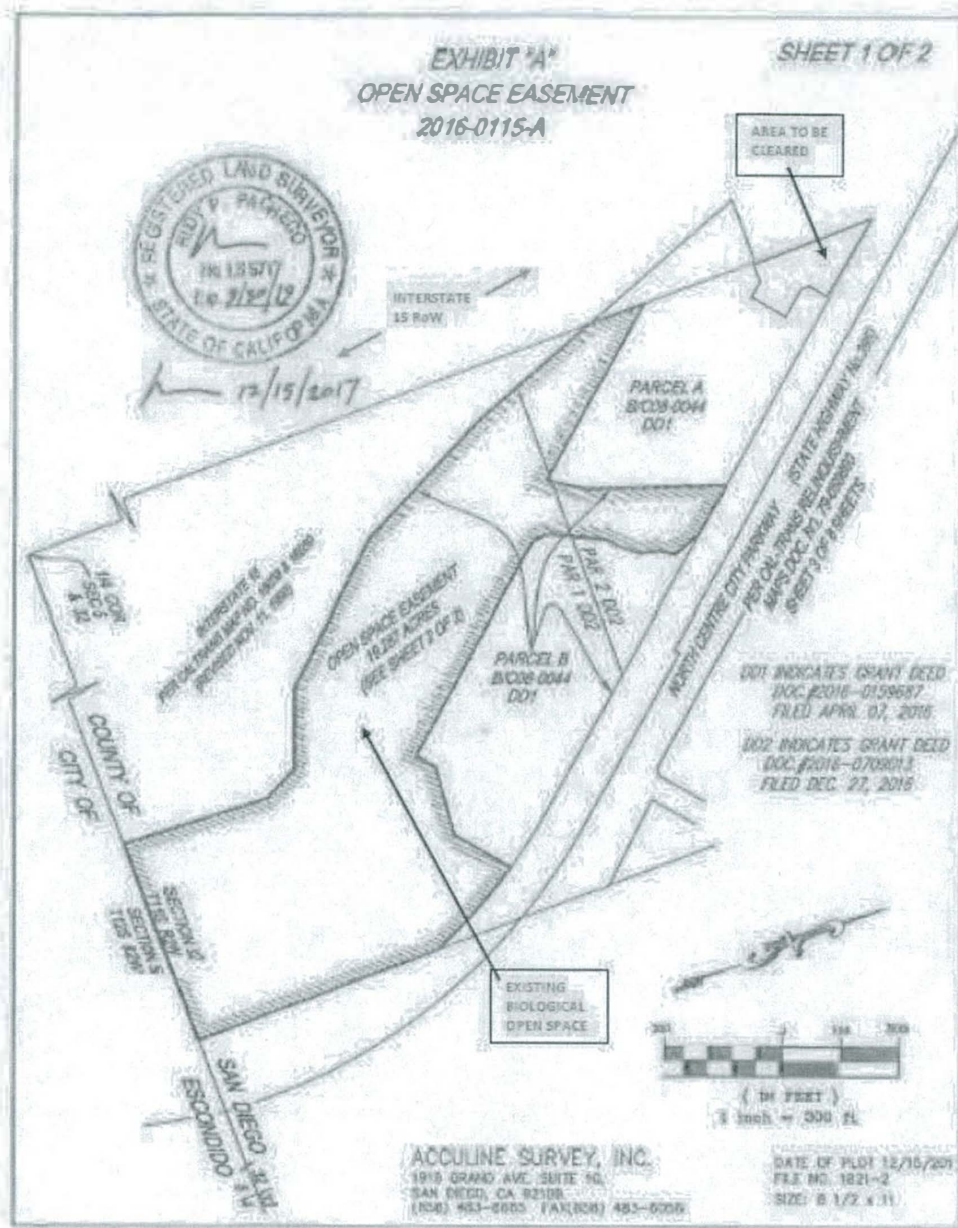
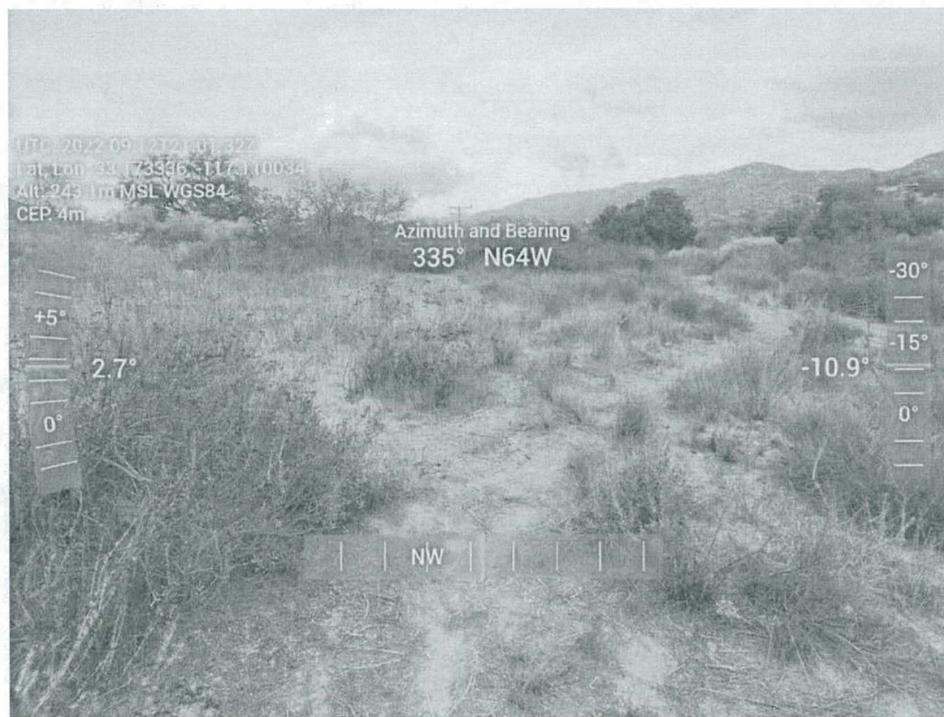


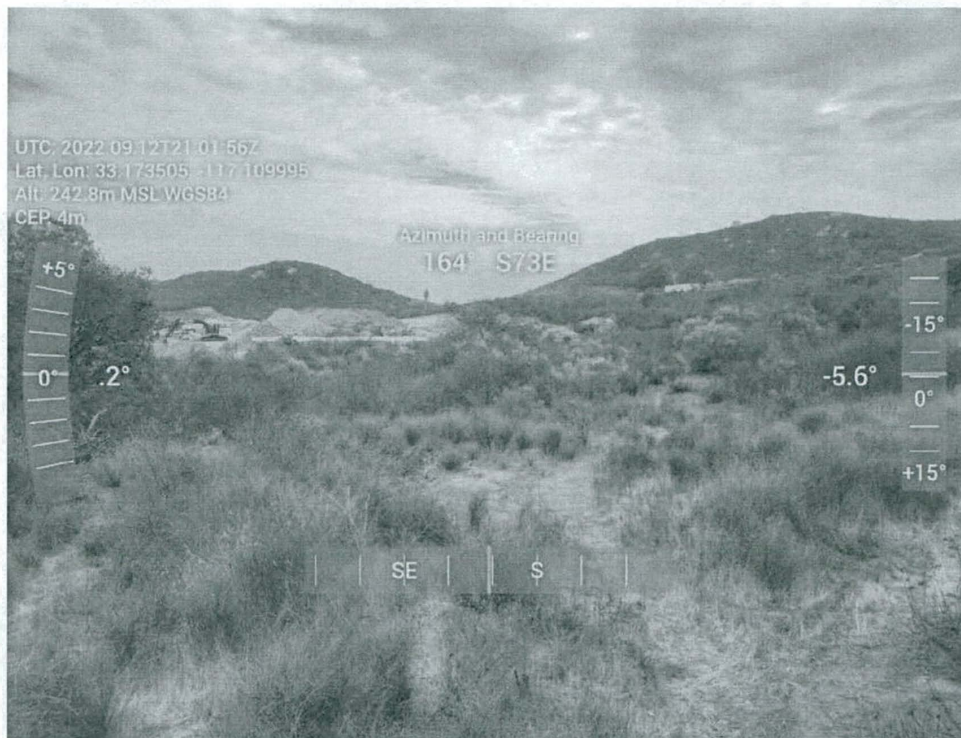
Figure 2. Location of area to be impacted relative to existing biological open space.



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

Ashley Smith, Page two
18 August 2022

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 *Poliophtila 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

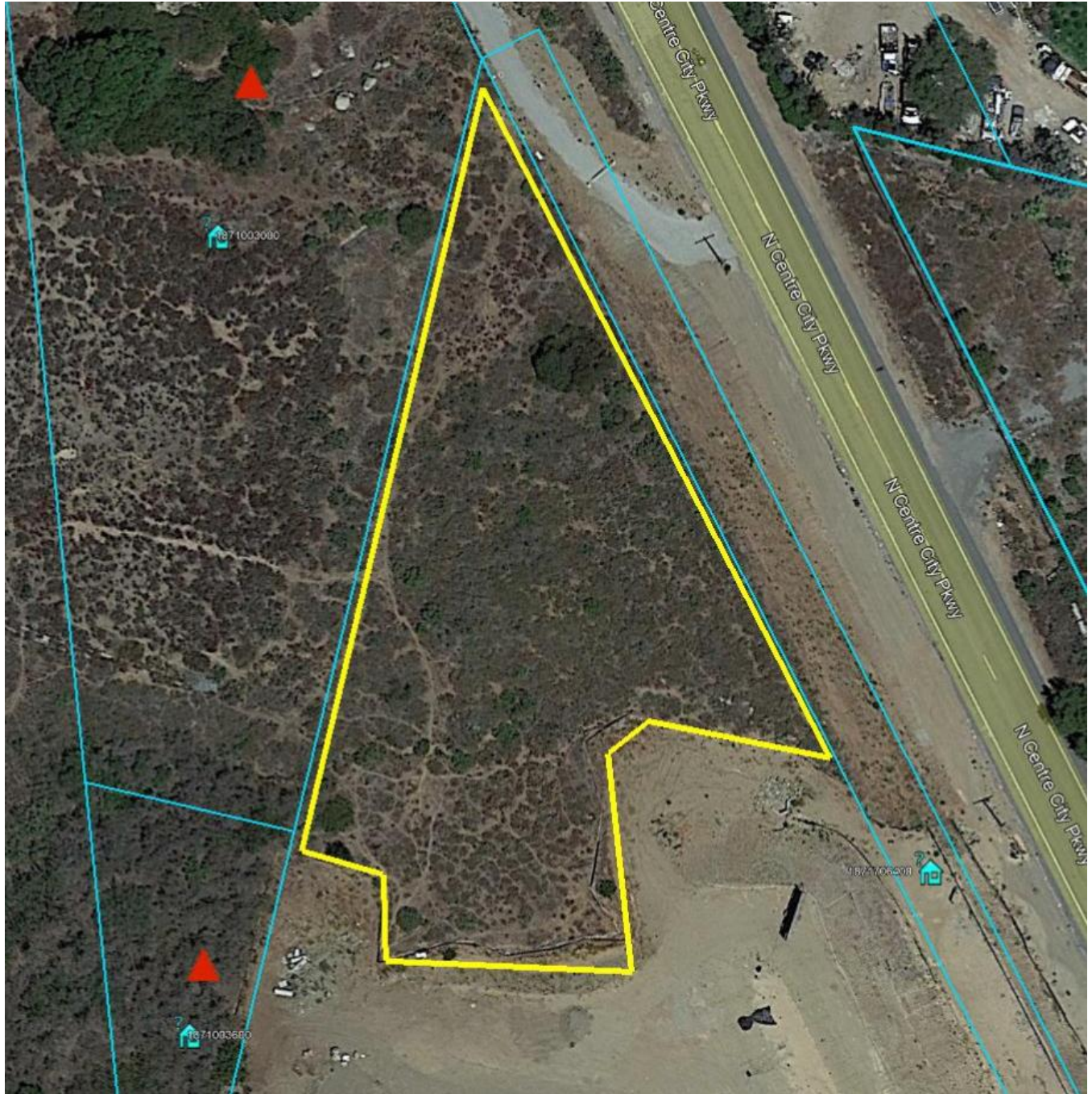
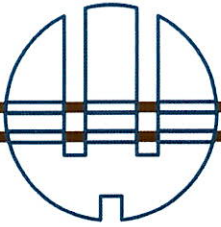


Figure 1. Area of CSS to be impacted ~1.1 Acres



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,

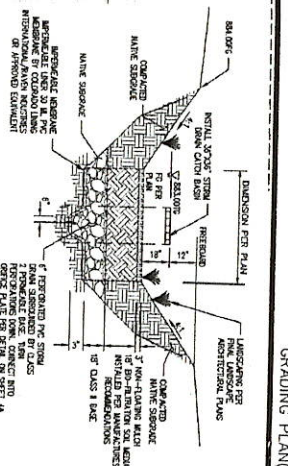
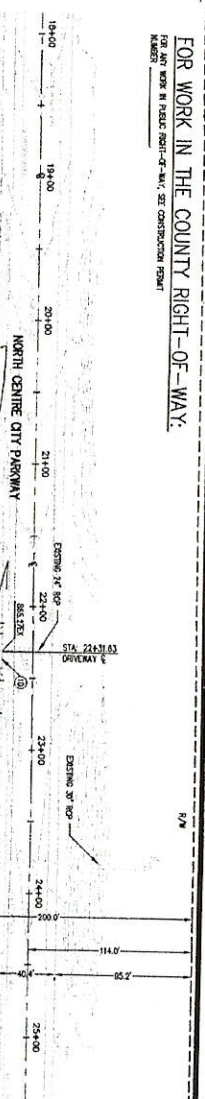
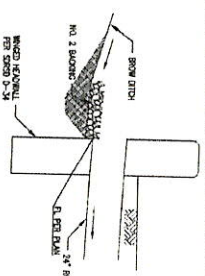
As part of the Grading Plan Change PDS2019-LDPCHG-00837, we Surveyed the Sensitive Vegetation Area of the North Lot, APN 187-170-62 as directed by Vince Scheidt, Project Biologist. The findings of this precise field survey are shown the Grading Plan Change on sheet 10.

The area of this Sensitive Vegetation Area is 1.1 acres.

Sincerely,

Michael Wunderlin
Wunderlin Engineering, Inc
LS 5210





NOTES:

1. ALL PROPOSED FILL SLOPES TO BE PLACED/CONSTRUCTED IN ACCORDANCE WITH RECOMMENDATIONS OF PROJECT GEOTECHNICAL ENGINEER.
2. AT CUT/FILL TRANSITION AREA OVERCROWDING CUT PORTION AND CONSTRUCTING AS A FILL SLOPE TO PREVENT POTENTIAL FOR SLIPAGE.

STORM DRAIN CONNECTION DETAIL

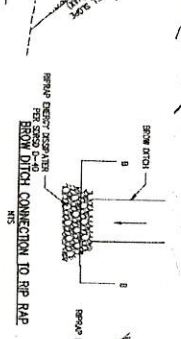
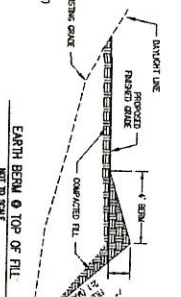
PER STENO 0-62

GEO TECHNICAL NOTES:

- 1 USE SEPARATION GEOTEXTILE (MIRAN 1401) OR APPROVED EQUIVALENT AROUND PIPE ZONE GRAVEL
- 2 BACKFILL WITH 2-SACK SLURRY AT TRENCH CONTAINING PIPE CONNECTION CATCH BASIN TO 24" DEPT. STORM DRAIN

CONSTRUCTION NOTES:

- [illegible]



DENSE DISSIPATER
PER. SIZES 8-40
SECTION B-B

BROW DITCH

Civil  **Landworks**

CAUTION!

DESIGN 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. SUPERINTENDENT TO CORRELATE THE LOCATION OF ALL EXISTING UTILITIES FROM TO STATE OF WORK, AND NOTIFY ENGINEER OF WORK, OR ANY DISCREPANCIES.

DEER SPRINGS
FIRE DISTRICT

APPROVED BY: 

DATE: 11/21/19

COUNTY APPROVED CHANGES			
NO.	DESCRIPTION	APPROVED BY:	DATE
1	KNOW SHEET		11/10/16

SOILS ENGINEER CERTIFICATION

RECEPTION, 255 RIVERSIDE, STAMFORD, CONNECTICUT 06902.
NO EMPLOYMENT.
ADDRESS: 12001 WILSON, OF THE DELAWARE AND DC PROPERTIES
ADDRESS FROM: 07034-54
DATE: 1980-03
NAME: BENCH MARK

SALE NO.	COUNTY OF SAN DIEGO	12
DEPARTMENT OF PUBLIC WORKS		SHEET
GREENS STORAGE, ESCONDIDO ESCONDIDO, CA CALIFORNIA COORDINATE INDEX		
386-170, 386-171, 386-172 386-173, 386-174, 386-175		
APPROVED FOR SALE BY AGENCY COMM. ENGINEER 	DATE 10/2/95	10/2/95
10/2/95 10/2/95	PG 56-6-10000-1 10000-1	10000-1

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 through 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 (*Poliophtila 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
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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 leucurus*) 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 indicated 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



Vincent Scheidt
Certified Biological Consultant

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

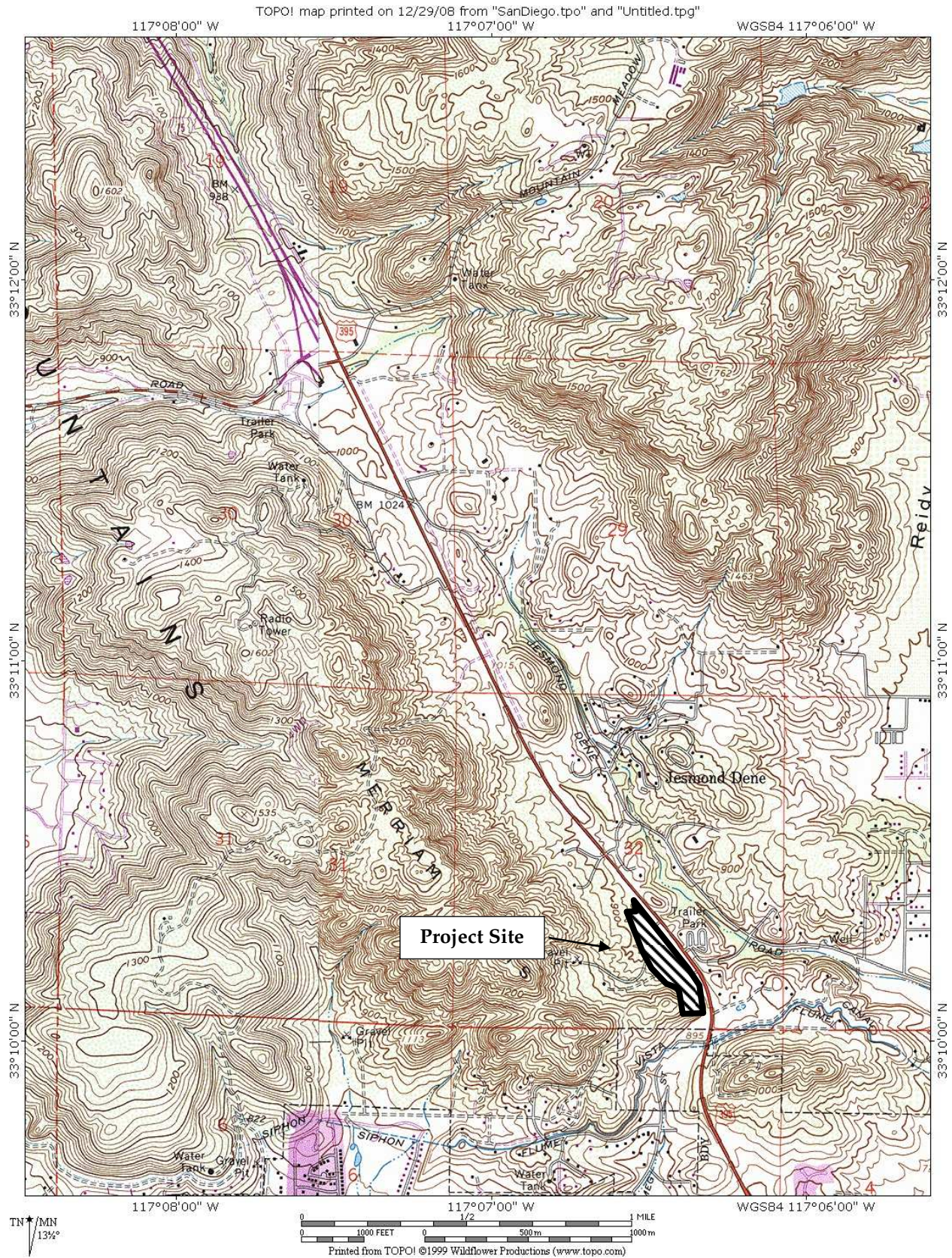


Figure 2. Recent Aerial Photograph – T&R Mini-Storage Project Site



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

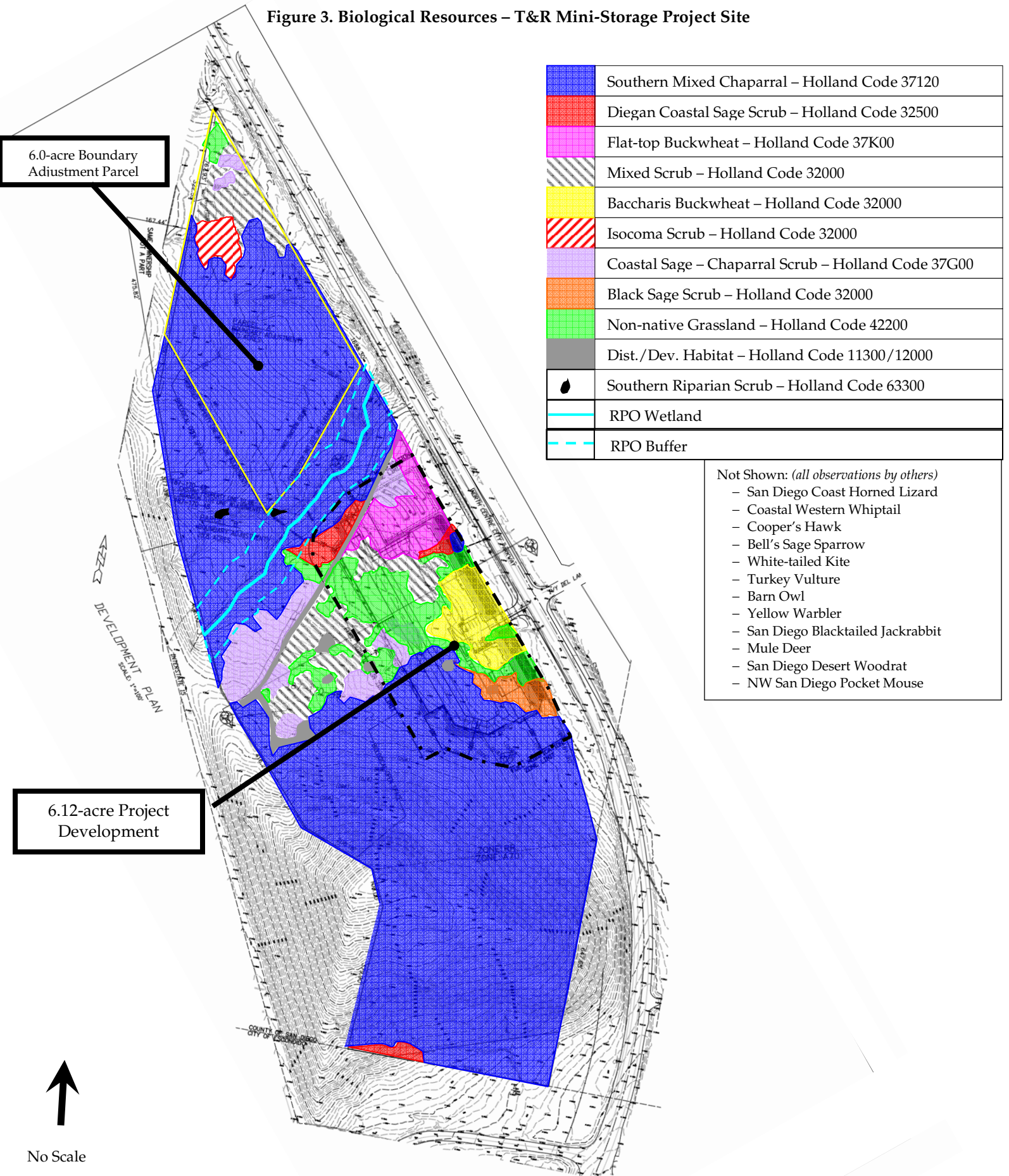


Figure 4. Onsite Biological Open Space Easement Alternative – T&R Mini-Storage Project Site

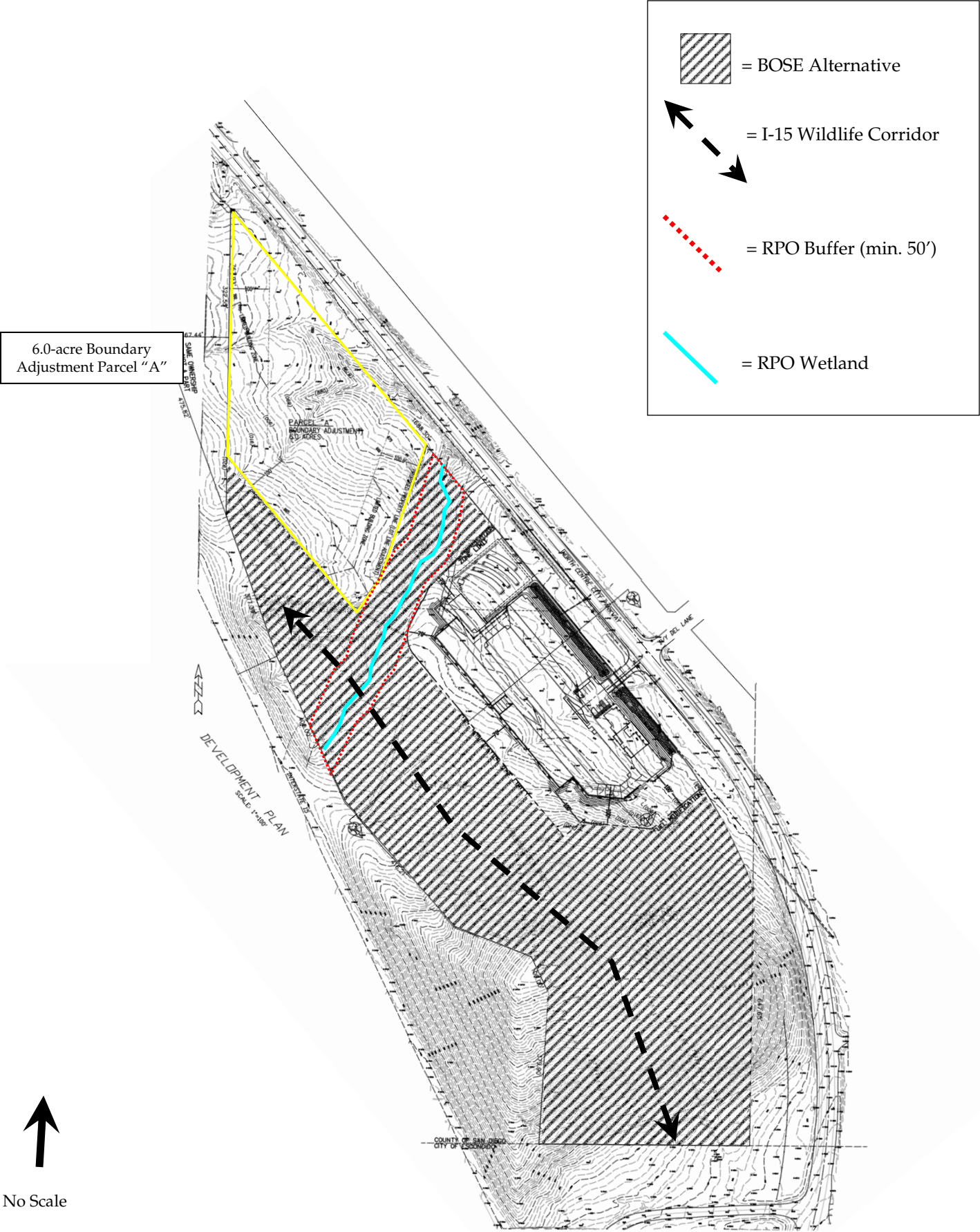


Table 1. Field Surveys – T&R Mini-Storage Project Site

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

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

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

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

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

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

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

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

* – non-native taxon

bold – sensitive taxon

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

<u>Biological Resource</u>	<u>Total</u> ²	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Preserved Onsite</u> ³	<u>Mitigation Required</u>	<u>Mitigation Provided</u> 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 indicated 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

		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
Latin Name	Common Name																									
Arctostaphylos rainbowensis	Rainbow Manzanita					A	X																		L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A		X	X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D	X	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 ruficeps 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

<i>Latin Name</i>	<i>Common Name</i>	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
<i>Nyctinomops macrotis</i>	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Nyctinomops femorosaccus</i>	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Odocoileus hemionus</i>	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
<i>Onychomys torridus ramona</i>	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
<i>Perognathus longimembris brevinasus</i>	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
<i>Salvadora hexalepis virgulata</i>	Coast Patch-Nosed Snake						X	X				X			X										M	2a
<i>Scaphiopus hammondi</i>	Western Spadefoot Toad						X	X	X	X	X					X				X				X	M	2a
<i>Taxidea taxus</i>	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
<i>Tyto alba</i>	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:

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

- 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".

The ROW alternative for dirt and rock disposal will impact the following habitats:

- 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 yards 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

A handwritten signature in black ink, appearing to read 'Vincent Scheidt', is positioned above a horizontal line.

Vincent Scheidt
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

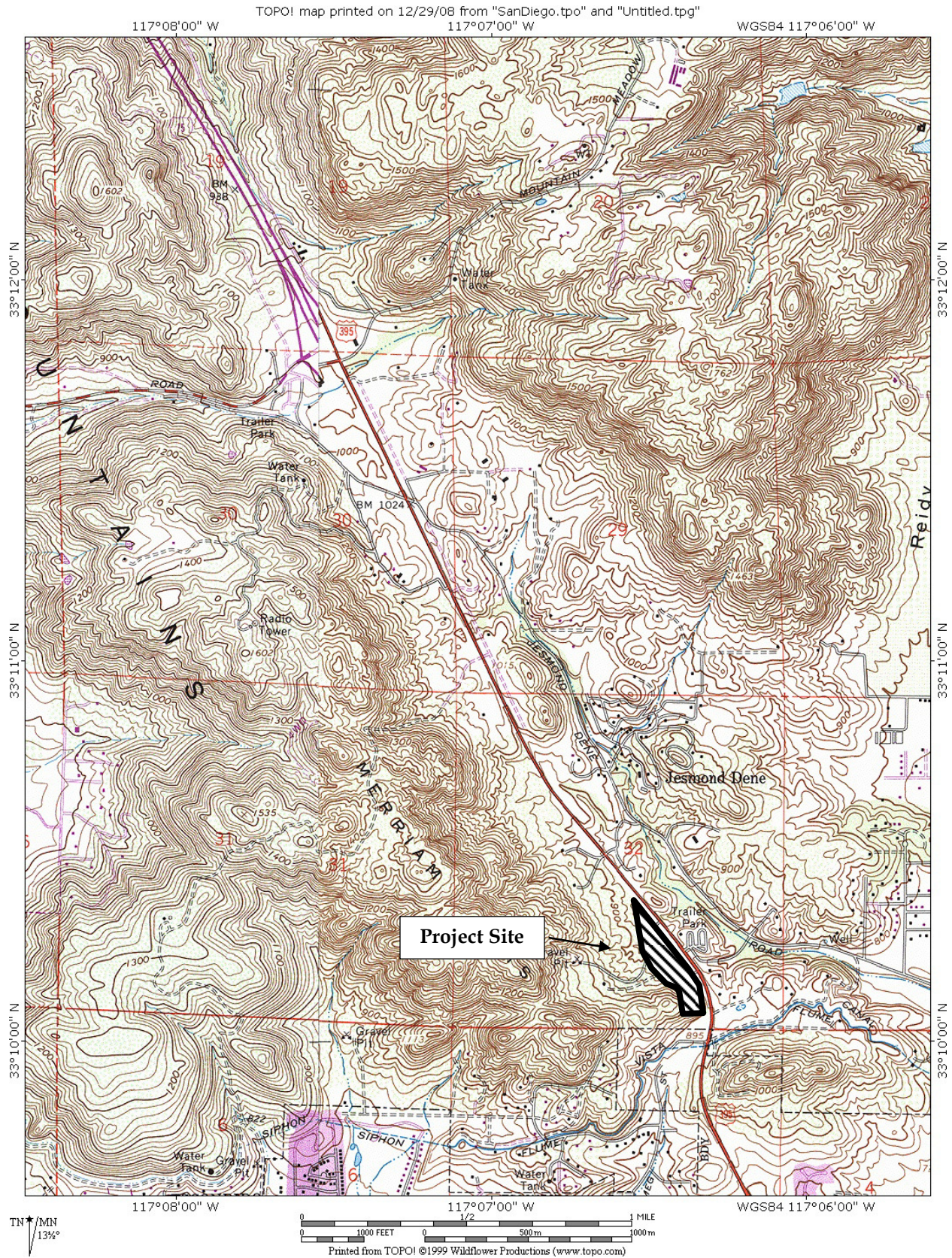


Figure 2. Recent Aerial Photograph - T&R Mini-Storage Project Site

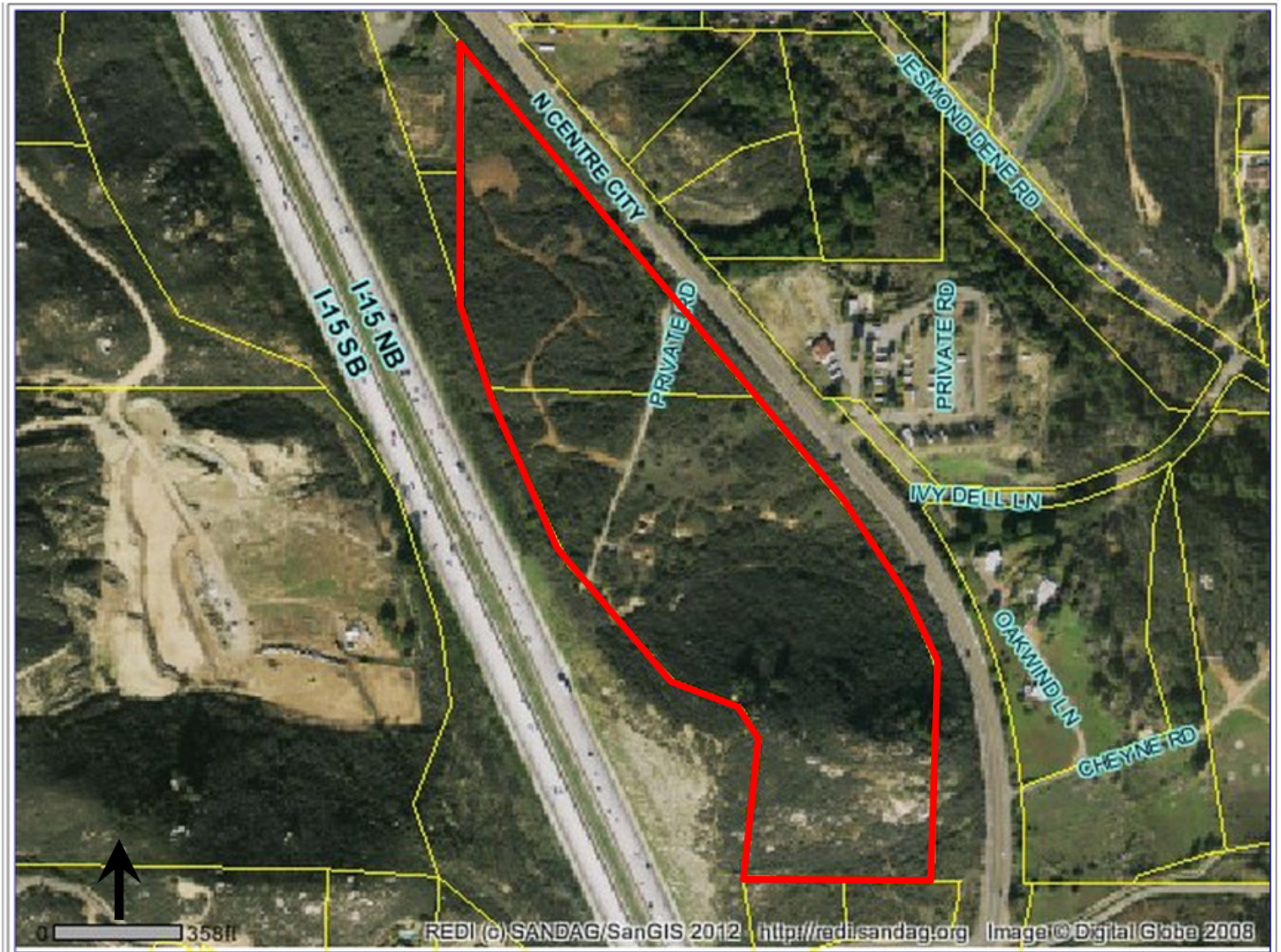


Figure 3. Biological Resources - T&R Mini-Storage Project Site

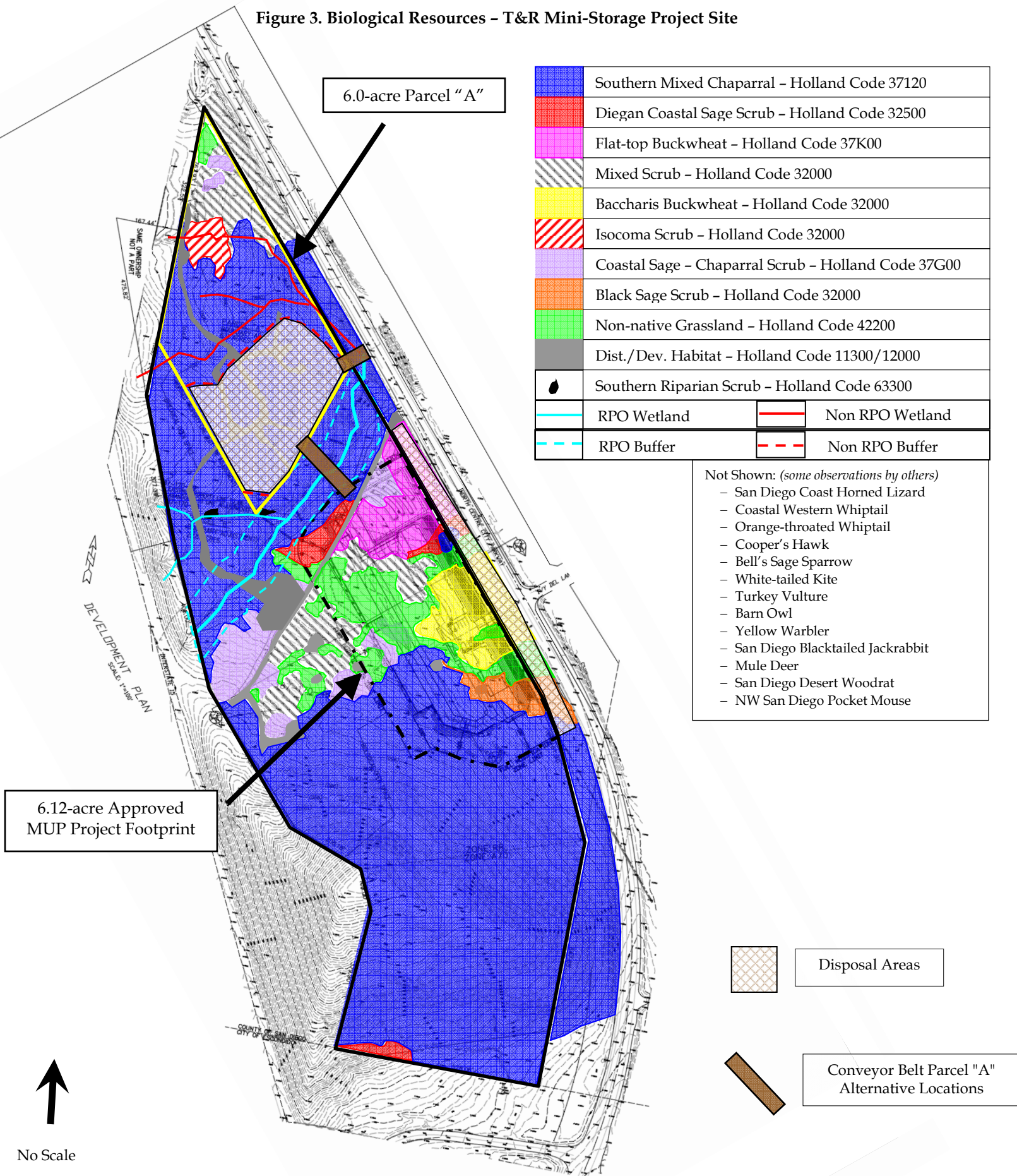


Figure 4. Proposed OSE - Parcel "A" Alternative - T&R Mini-Storage MUP Modification Project Site

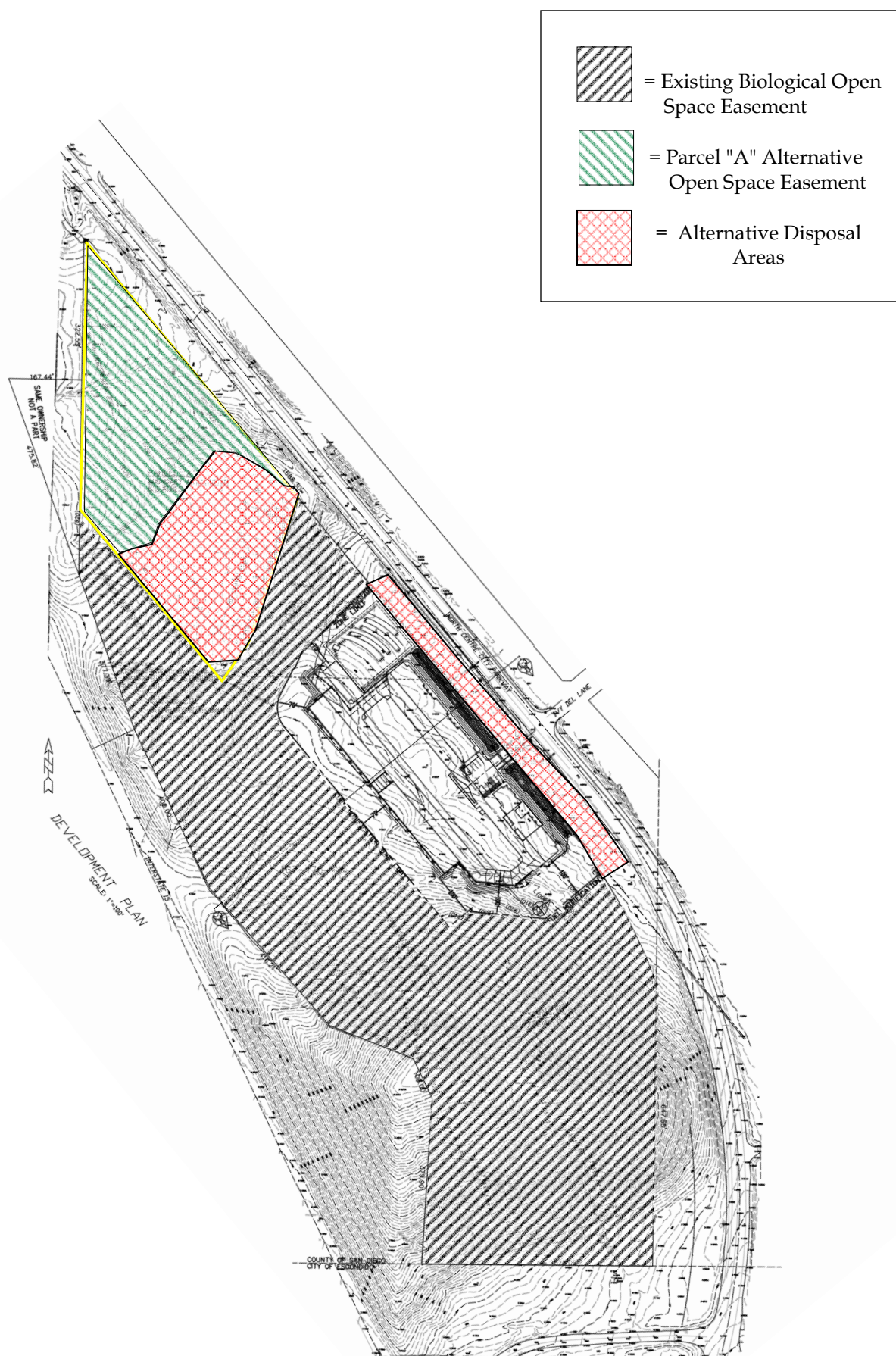


Table 1. Field Surveys – T&R Mini-Storage Project Site

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

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

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

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

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

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

Birds

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

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

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

Mammals

<i>Canis latrans</i>	Coyote
<i>Chaetodipus fallax fallax</i>	Northwestern San Diego Pocket Mouse
<i>Dipodomys agilis</i>	Pacific Kangaroo Rat
<i>Lepus californicus bennettii</i>	San Diego Black-tailed Jackrabbit
<i>Neotoma lepida</i>	San Diego Desert Woodrat
<i>Onychomys leucogaster</i>	Mule Deer
<i>Peromyscus maniculatus</i>	Deer Mouse
<i>Procyon lotor</i>	Raccoon
<i>Spermophilus beecheyi</i>	California Ground Squirrel
<i>Sylvilagus audubonii</i>	Desert Cottontail

Amphibians and Reptiles

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

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

* – non-native taxon

bold – sensitive taxon

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

<u>Parcel "A" Alternative</u>					
<u>Biological Resource</u>	<u>Total</u> ²	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>	<u>Mitigation Provided</u> 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	--
<u>ROW Alternative</u>					
<u>Biological Resource</u>	<u>Total</u>	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>	<u>Mitigation Provided</u>
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

		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
Latin Name	Common Name																									
Arctostaphylos rainbowensis	Rainbow Manzanita					A	X																		L	1b
Brodiaea ortcuttii	Orcutt's Brodiaea					A		X	X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D	X	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	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 ruficeps 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	2

<i>Latin Name</i>	<i>Common Name</i>	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
<i>Nyctinomops macrotis</i>	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Nyctinomops femorosaccus</i>	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Odocoileus hemionus</i>	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
<i>Onychomys torridus ramona</i>	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
<i>Perognathus longimembris brevinasus</i>	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
<i>Salvadora hexalepis virgultea</i>	Coast Patch-Nosed Snake						X	X				X			X										M	2a
<i>Scaphiopus hammondi</i>	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
<i>Taxidea taxus</i>	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
<i>Tyto alba</i>	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 through 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:

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

- 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".

The ROW alternative for dirt and rock disposal will impact the following habitats:

- 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 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. 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:

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 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 onsite via the dedication of a Biological Open Space Easement over 6.5 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. No mitigation for impacts to 0.6 acre of DH is required.

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

A handwritten signature in black ink, appearing to read 'Vincent Scheidt', is positioned above a horizontal line.

Vincent Scheidt
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

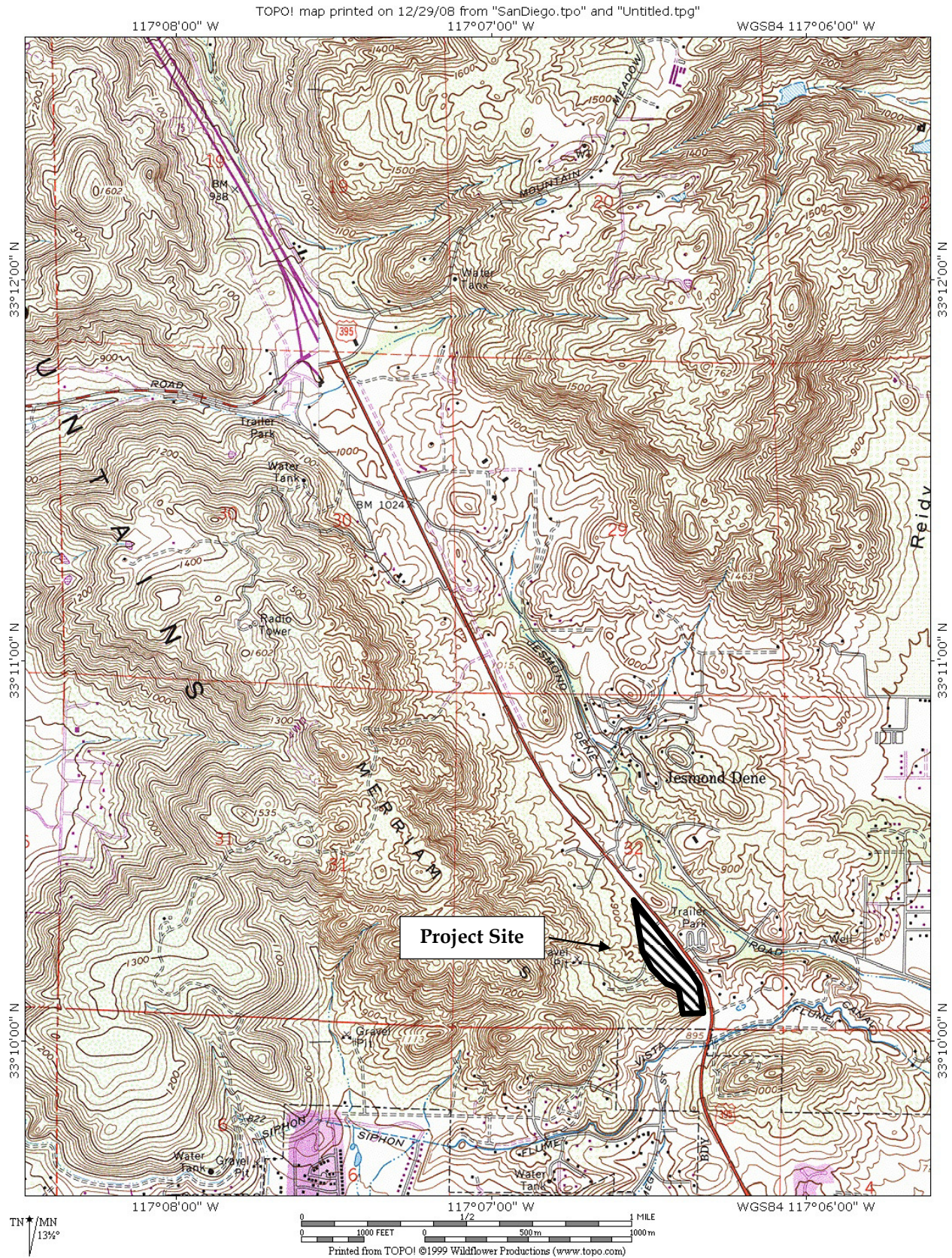


Figure 2. Recent Aerial Photograph - T&R Mini-Storage Project Site

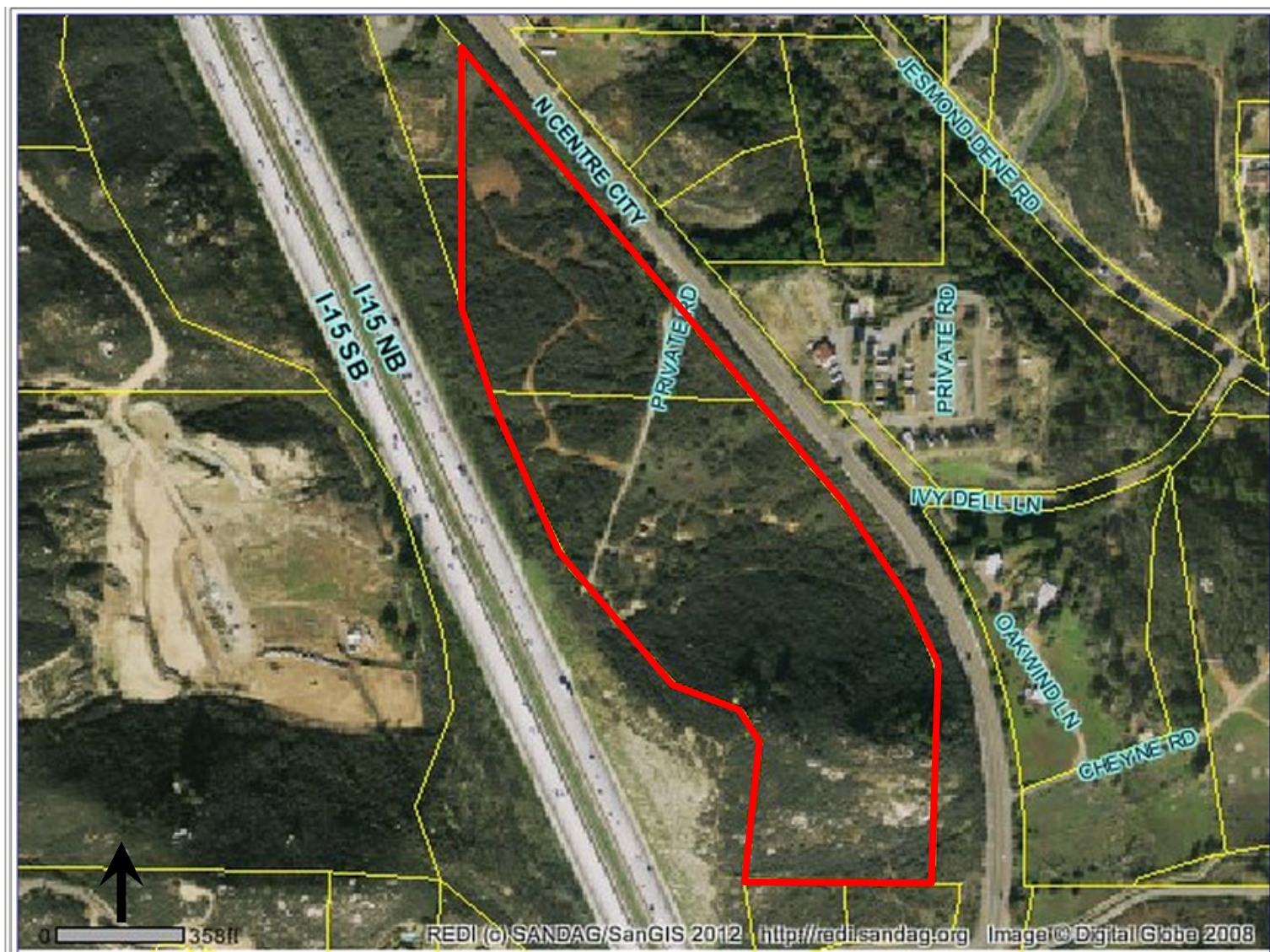


Figure 3. Biological Resources – T&R Mini-Storage Project Site

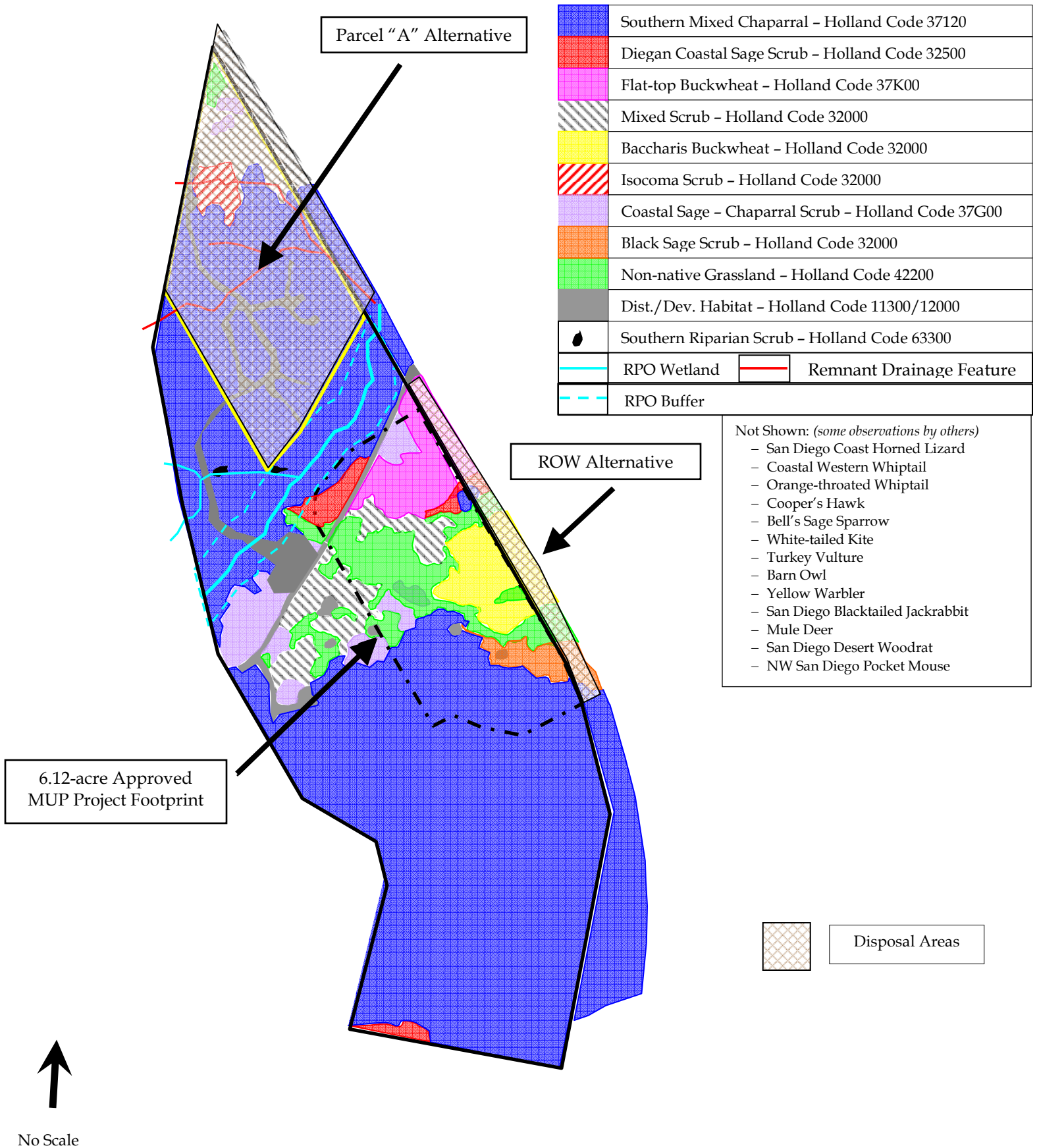


Table 1. Field Surveys – T&R Mini-Storage Project Site

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

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

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

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

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

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

Birds

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

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

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

Mammals

<i>Canis latrans</i>	Coyote
<i>Chaetodipus fallax fallax</i>	Northwestern San Diego Pocket Mouse
<i>Dipodomys agilis</i>	Pacific Kangaroo Rat
<i>Lepus californicus bennettii</i>	San Diego Black-tailed Jackrabbit
<i>Neotoma lepida</i>	San Diego Desert Woodrat
<i>Onychomys leucogaster</i>	Mule Deer
<i>Peromyscus maniculatus</i>	Deer Mouse
<i>Procyon lotor</i>	Raccoon
<i>Spermophilus beecheyi</i>	California Ground Squirrel
<i>Sylvilagus audubonii</i>	Desert Cottontail

Amphibians and Reptiles

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

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

* – non-native taxon

bold – sensitive taxon

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

<u>Parcel "A" Alternative</u>				
<u>Biological Resource</u>	<u>Total ²</u>	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>
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
<u>ROW Alternative</u>				
<u>Biological Resource</u>	<u>Total</u>	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>
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	Pinon-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								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D	X	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 abboti	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								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	--

<i>Latin Name</i>	<i>Common Name</i>	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
<i>Nyctinomops macrotis</i>	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Nyctinomops femorosaccus</i>	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Odocoileus hemionus</i>	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
<i>Onychomys torridus ramona</i>	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
<i>Perognathus longimembris brevinasus</i>	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
<i>Salvadora hexalepis virgultea</i>	Coast Patch-Nosed Snake						X	X				X			X										M	2a
<i>Scaphiopus hammondi</i>	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
<i>Taxidea taxus</i>	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
<i>Tyto alba</i>	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 (*Poliophtila 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:

The use of Parcel "A" + access for dirt and rock disposal 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 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

A handwritten signature in black ink, appearing to read 'Vincent Scheidt', is written over a horizontal line.

Vincent Scheidt
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

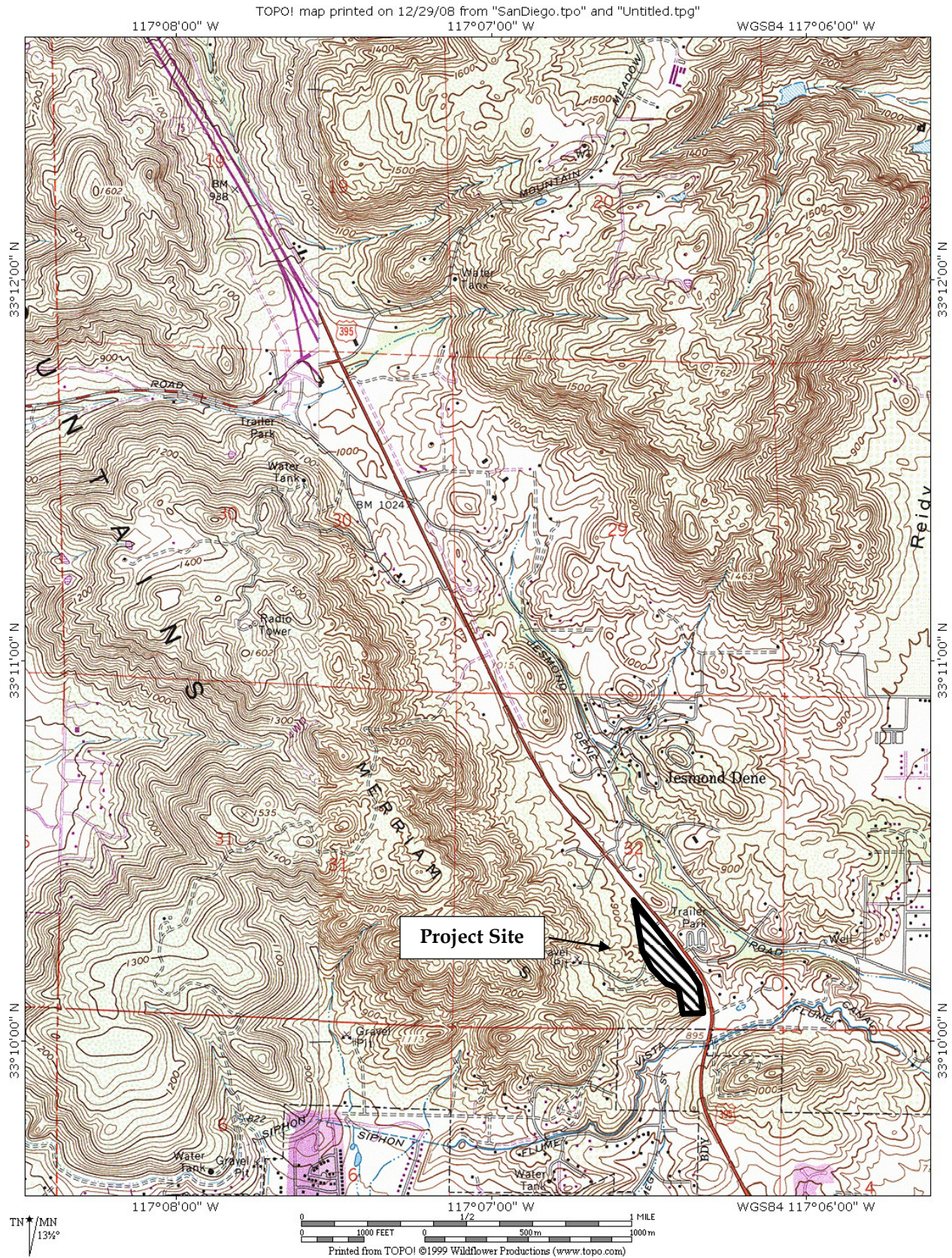


Figure 2. Aerial Photograph - T&R Mini-Storage Project Site

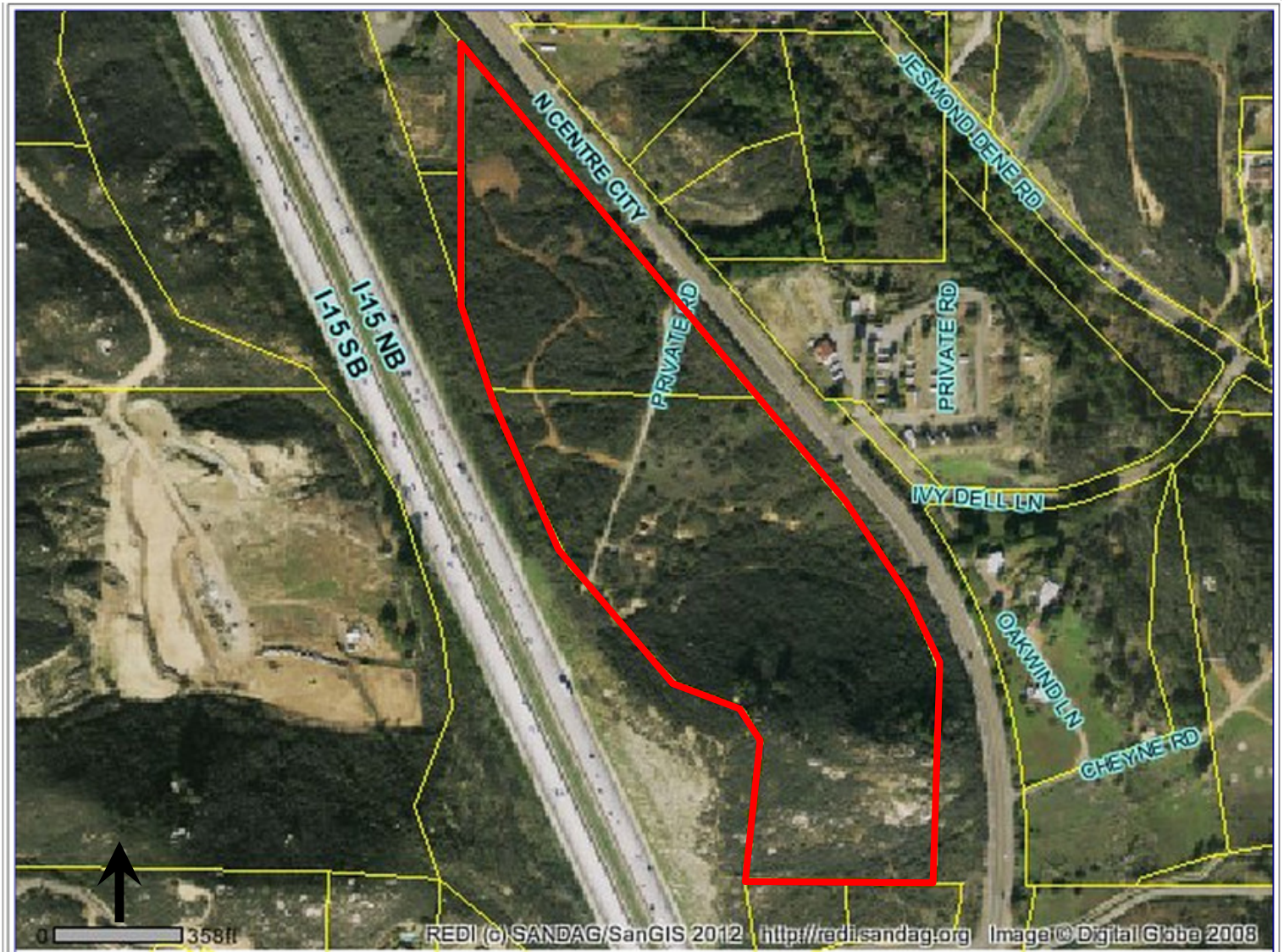
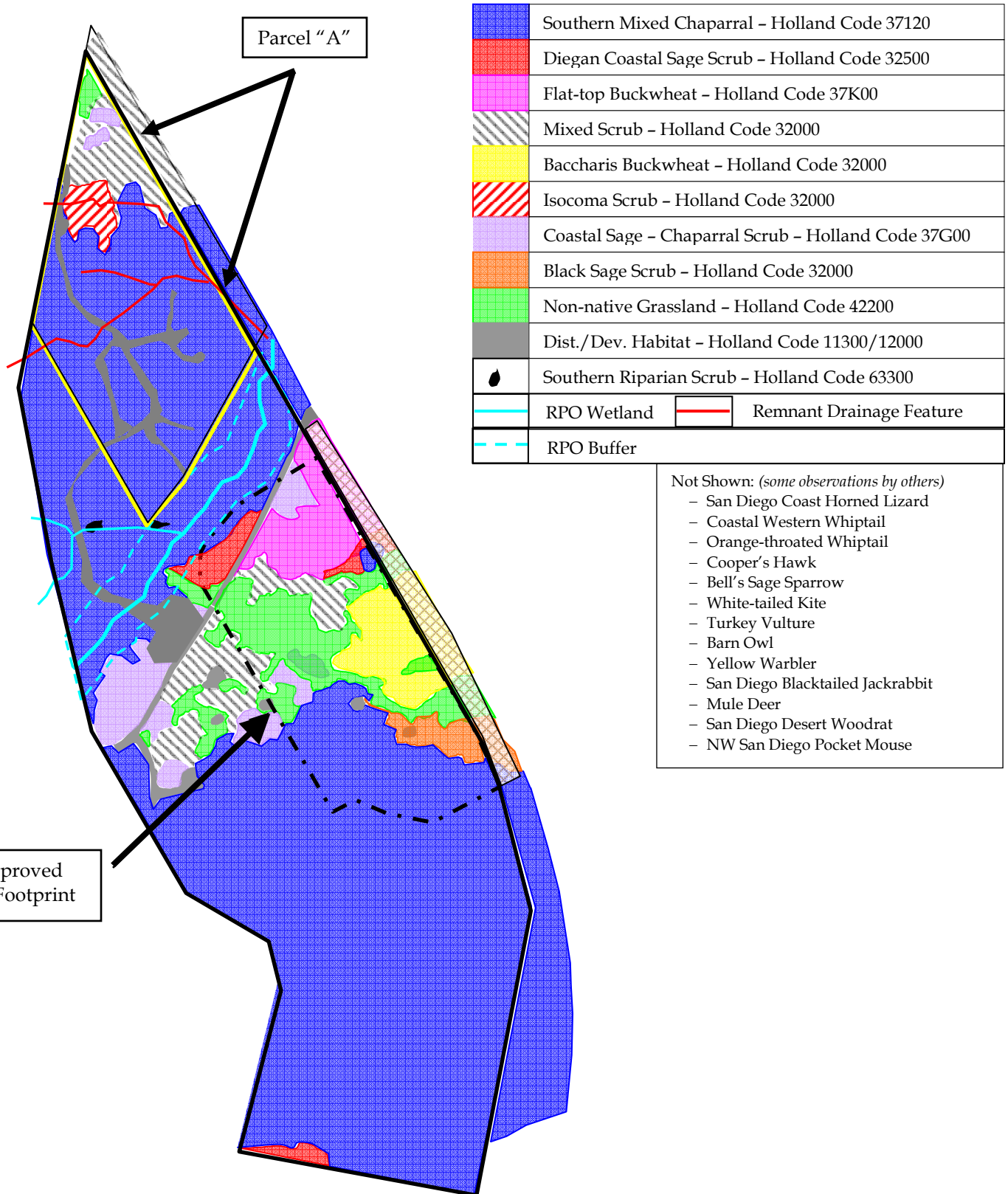


Figure 3. Biological Resources – T&R Mini-Storage Project Site



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No Scale

Grading Plan

Legend:

- Red hatched area = Coastal Scrub and NNG
- Blue hatched area = Southern Mixed Chaparral

CONSTRUCTION NOTES:

1. EXISTING GRADE SHOWN
2. EXISTING DRAINAGE SHOWN
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PRIVATE CONTRACT

Civil Landworks

760-908-8745

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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

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

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

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

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

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

Birds

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

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

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

Mammals

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

Amphibians and Reptiles

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

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

* – non-native taxon

bold – sensitive taxon

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

<u>Parcel "A" + Access Impact/Mitigation Analysis</u>				
<u>Biological Resource</u>	<u>Total</u>	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>
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 BOSE²

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

		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
Latin Name	Common Name																									
Arctostaphylos rainbowensis	Rainbow Manzanita					A	X																		L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A		X	X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D	X	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 ruficeps 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	2

<i>Latin Name</i>	<i>Common Name</i>	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
<i>Nyctinomops macrotis</i>	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Nyctinomops femorosaccus</i>	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Odocoileus hemionus</i>	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
<i>Onychomys torridus ramona</i>	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
<i>Perognathus longimembris brevinasus</i>	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
<i>Salvadora hexalepis virgultea</i>	Coast Patch-Nosed Snake						X	X				X			X										M	2a
<i>Scaphiopus hammondi</i>	Western Spadefoot Toad						X	X	X	X	X	X				X				X				X	M	2a
<i>Taxidea taxus</i>	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
<i>Tyto alba</i>	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

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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

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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 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
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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 transporting 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

A handwritten signature in black ink, appearing to read 'Vincent Scheidt', is positioned above a horizontal line.

Vincent Scheidt
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

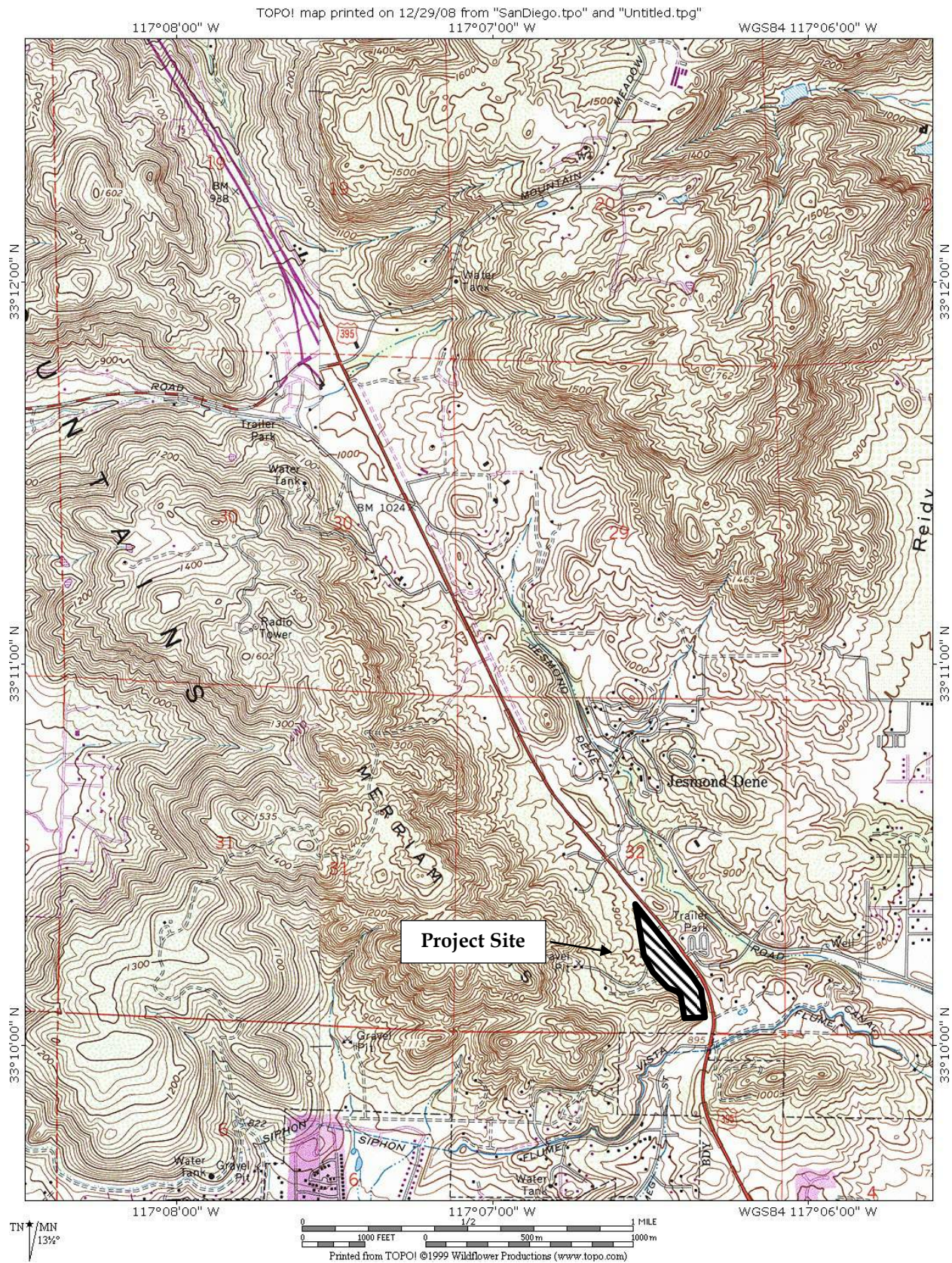
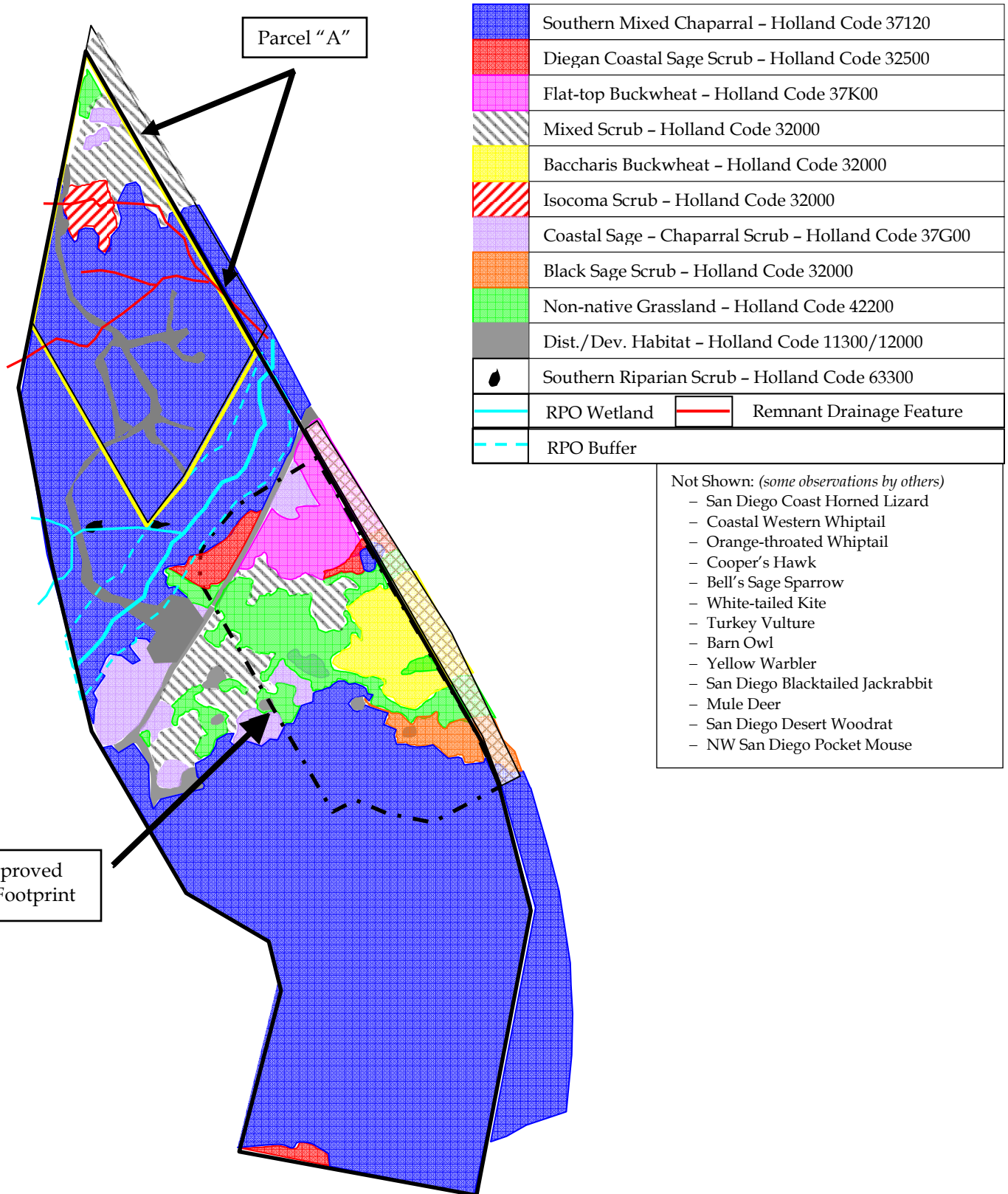


Figure 2. Aerial Photograph - T&R Mini-Storage Project Site



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



↑
No Scale

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

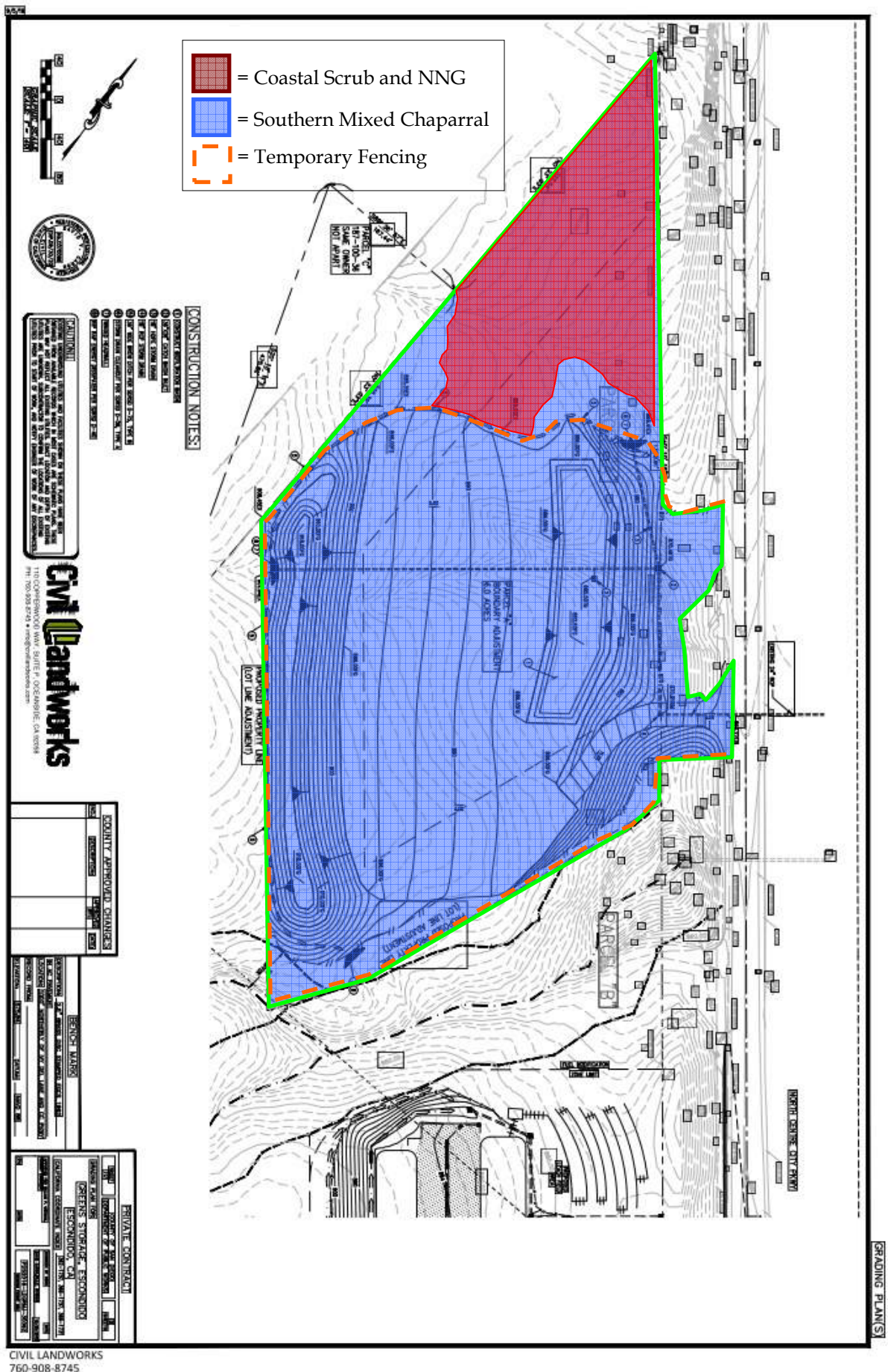


Figure 5. Biological Resources on Extended Grading Permit (Parcel "A")
SuperStacker® Conveyor Belt System Back-up Alternative

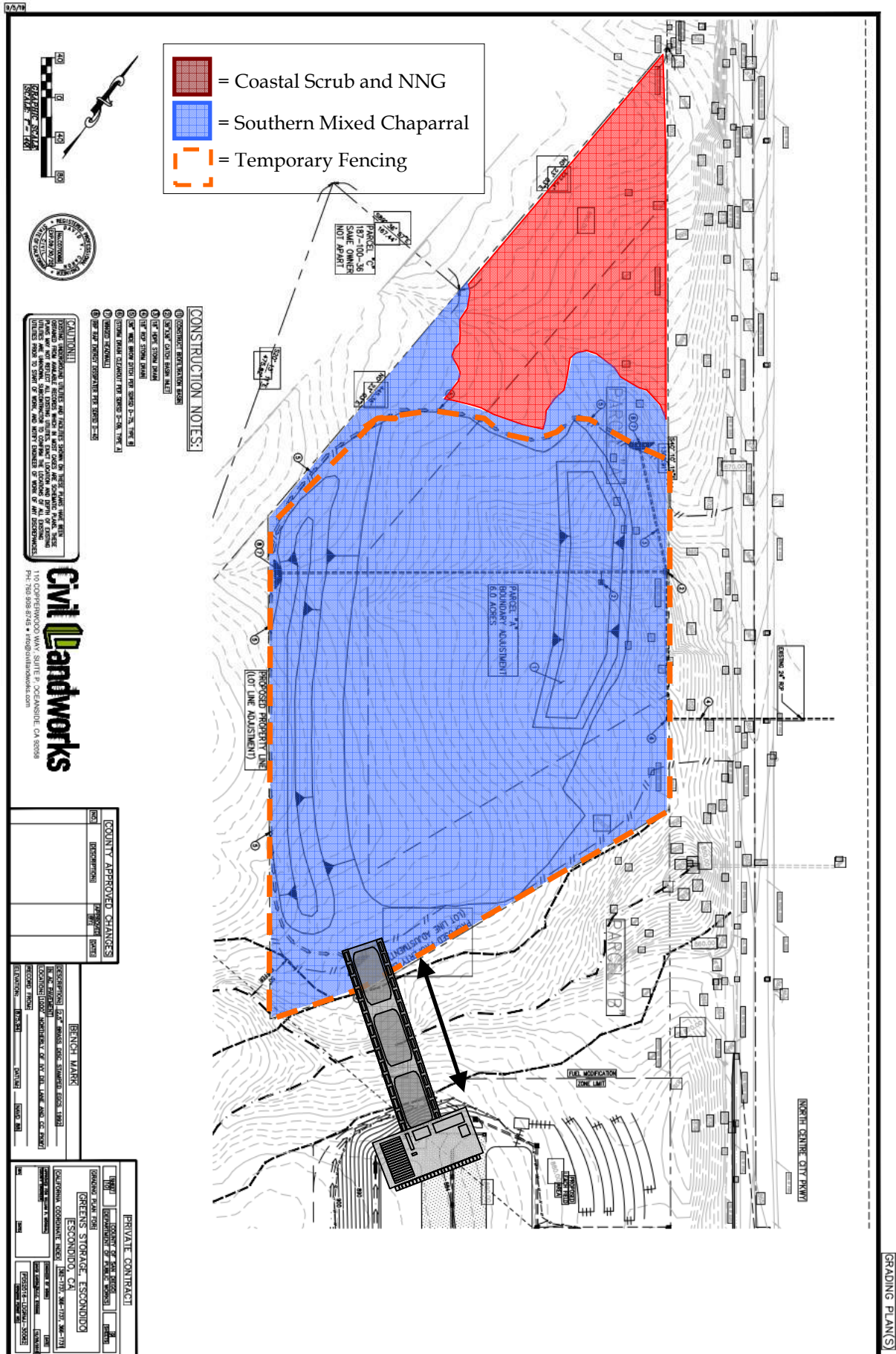


Figure 6. SuperStacker[®] Conveyor Belt System for the Extended Grading Permit (Parcel "A")



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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

<u>Date</u>	<u>Personnel</u>	<u>Hours</u>	<u>Study</u>	<u>Conditions</u>
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

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

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

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

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

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

Birds

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

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

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

Mammals

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

Amphibians and Reptiles

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

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

* – non-native taxon

bold – sensitive taxon

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

<u>Parcel "A" + Access Impact/Mitigation Analysis</u>				
<u>Biological Resource</u>	<u>Total</u>	<u>Impacted</u>	<u>Impact Neutral</u>	<u>Mitigation Required</u>
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 BOSE²

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

		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
Latin Name	Common Name																									
Arctostaphylos rainbowensis	Rainbow Manzanita					A	X																		L	1b
Brodiaea orcuttii	Orcutt's Brodiaea					A		X	X	X	X	X								X					L	1a
Chorizanthe leptotheca	Peninsular Spine Flower					D	X	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	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 ruficeps 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	

<i>Latin Name</i>	<i>Common Name</i>	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
<i>Nyctinomops macrotis</i>	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Nyctinomops femorosaccus</i>	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	M	2a
<i>Odocoileus hemionus</i>	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X			X	O	--
<i>Onychomys torridus ramona</i>	Southern Grasshopper Mouse						X	X	X			X												X	L	1a
<i>Perognathus longimembris brevinasus</i>	Los Angeles Little Pocket Mouse						X	X	X		X	X										X		X	L	1a
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard						X	X	X	X		X	X											X	O	--
<i>Salvadora hexalepis virgultea</i>	Coast Patch-Nosed Snake						X	X				X			X										M	2a
<i>Scaphiopus hammondi</i>	Western Spadefoot Toad						X	X	X	X	X					X				X				X	M	2a
<i>Taxidea taxus</i>	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a
<i>Tyto alba</i>	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.

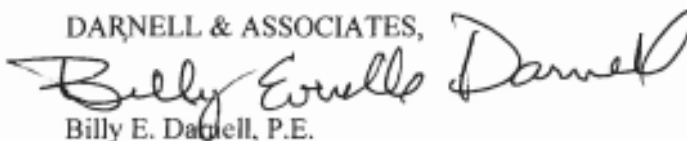
To safely accommodate the haul route, we have prepared Drawings No.'s T-1 and T-2 showing the traffic control requirements. It should be noted the plan proposes that a staging area be provided at each site to control up to three (3) tandem truck units and to stage their entrance into North Centre City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

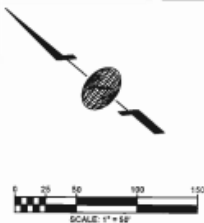


Billy E. Darnell, P.E.
RCE: 22338

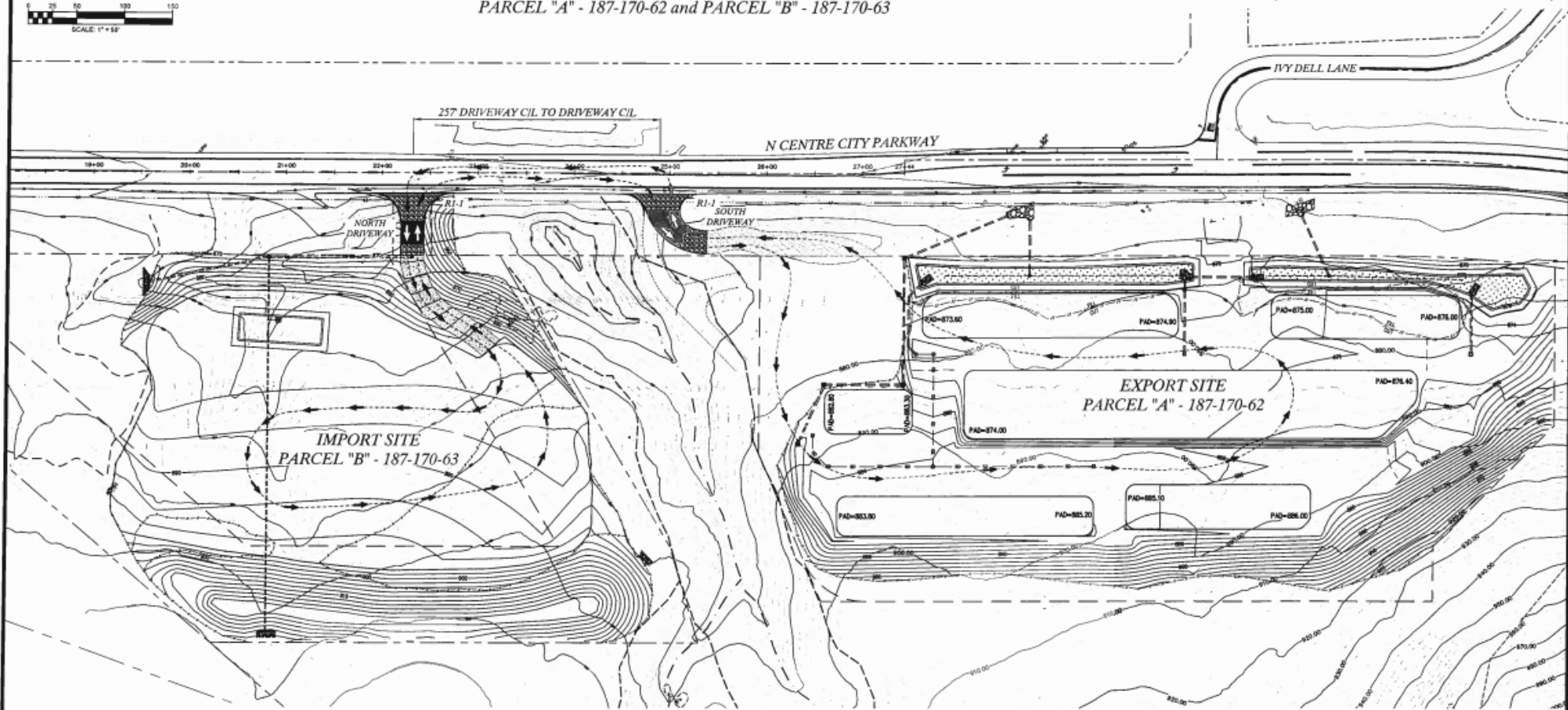
BED/jam
180304 - Escondido Storage Haul Route_OCT 2019



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 INFORMATION
PLANS PREPARED BY: *Ben Smith* DATE: 08/15/2016
CHECKED BY: *Ben Smith* DATE: 08/15/2016
DESIGNED BY: *Ben Smith* DATE: 08/15/2016
Darnell & ASSOCIATES, INC.
3611 MERCURY STREET, SUITE 207
SAN DIEGO, CA 92108
TEL: 619.594.1111 FAX: 619.594.1112
WWW.DARNELL-AND-ASSOCIATES.COM

ST. SCALE
1" = 50'
NORTH
0 50 100
IF THIS BAR IS NOT
PRESENT, THE PLAN
IS VOID

COUNTY OF SAN DIEGO TRAFFIC ENGINEERING DEPARTMENT HAUL ROUTE CIRCULATION EXHIBIT FOR GREENS STORAGE, ESCONDIDO, CA NORTH CENTRE PARKWAY NORTH OF IVY DELL LANE REF: GRADING PERMIT NO. PDS2016-LDGRM1-30062		FIGURE NO. 1 SHEET 1 OF 3 SHEETS
--	--	--



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

NOTIFICATION: 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) 694-3850
SAN DIEGO TRANSIT DEPT.	(BUS STOPS AFFECTED)	(619) 258-0100/(645)
UNDERGROUND SERVICE ALERT	(ANY EXCAVATION)	(800) 422-4123

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

LEGEND

- FLAGGER WITH CM(CA) PADDLE
- TRAFFIC SIGN
- TRAFFIC DIRECTION
- HIGH VISIBILITY WARNING FLAHS
- CONES / DELINEATORS

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



ENGINEER'S INFORMATION
DESIGNED BY: *San Smith* 10/20/2019
CHECKED BY: *San Smith* 10/20/2019
DATE: 10/20/2019
Darnell A. ASSOCIATES, INC.
2411 MONTEVISTA DRIVE, SUITE 200
SAN DIEGO, CA 92111
(619) 584-1000
FAX: (619) 584-1001
WWW.DARNELL-ASSOCIATES.COM

SCALE:
1" = 40'
WARNING:
IF THIS DRAWING IS NOT ADOPTED BY THE BOARD OF SUPERVISORS, IT SHALL BE VOID.

COUNTY OF SAN DIEGO		DRAWING NO.
TRAFFIC ENGINEERING DEPARTMENT		T-1
TRAFFIC CONTROL PLANS		
FOR		
GREENS STORAGE, ESCONDIDO, CA		
NORTH CENTRE PARKWAY NORTH OF IVY DELL LANE		
REF: GRADING PERMIT NO. PDS2016-LDGRM1-90062		

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

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 (*Poliophtila 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.