

July 10, 2018

Pastor Dan Grant  
Attn: Jodi Castillo  
Skyline Church  
11330 Campo Road  
La Mesa, CA 91941

**Subject: Biological Resources Letter Report for the Skyline Retirement Center, San Diego County, California; APNs 506-140-06, -07; Prepared for the County of San Diego; PDS2016-ER-16-91-001, -MUP16-003, -GPA-16-005, -REZ-16-003**

Dear Pastor Dan Grant:

REC Consultants, Inc. has prepared this letter report to address potential impacts of the proposed Skyline Retirement Center project to existing biological resources.

## **SUMMARY**

The project proposes a senior living facility on an approximately 8.8-acre property in the Valle de Oro Community Plan Area. Implementation of the project would result in significant impacts to approximately 5.8 acres of sensitive Diegan coastal sage scrub, 0.6 acre of non-native grassland, Palmer's goldenbush, San Diego sunflower, unique coast cholla patches, California gnatcatcher, orange-throated whiptail, and raptor foraging habitat. These impacts will be significant and require mitigation. Mitigation for habitat impacts will be provided by conserving 6.6 acres of coastal sage scrub and 2.7 acres of southern riparian woodland in offsite Biological Open Space. Mitigation for impacts to the sensitive species will be provided through habitat-based mitigation, preservation of Palmer's goldenbush and California gnatcatcher in the Biological Open Space, and salvage of the coast cholla. These mitigation measures, in conjunction with standard avoidance measures such as avoiding grading during avian breeding season, will reduce the project's impacts to below a level of significance.

## **INTRODUCTION, PROJECT DESCRIPTION, LOCATION, SETTING**

The proposed Skyline Retirement Center project (Project) would be constructed on State Route (SR) 94 (Campo Road) at Via Mercado, northwest of the existing Skyline Church, within unincorporated San Diego County, on APNs 506-140-06 and -07. The Project site (Site) is within the Valle De Oro Community Plan Area.

The Site was originally surveyed and assessed for habitats as part of the Environmental Impact Report prepared for the Skyline Church in 1996 but was not part of the church project footprint.

## **Project Description**

A multi-story main building with three separate wings would connect to central common areas. A total of 147 assisted living units would be housed in Wings 1 and 2. Wing 1 would be the largest, with 24,500 square foot (SF )per floor, and Wing 2 would have 20,106 SF per floor. Wing 3 would house 75 independent living residences with 21,920 SF per floor. This wing would also provide basement parking. The entire Project footprint constitutes the Major Use Permit (MUP) area.

The 13,000 SF common area would be on two levels in the main building and would include a lobby, offices, clinic services, exercise rooms, a commercial kitchen, and dining halls. Additional facilities and amenities would include a pool, landscaped courtyard and social grounds, a playground, and walking trails. The project is proposed to be LEED Silver and may include solar panels on the roof of the building.

Ten duplex units would also be provided in five detached structures. Three of these buildings would be near the northwestern corner of the property and two would be closer to the project entrance. Each of the buildings would be 1,500 SF in size. The proposed project therefore totals 232 units: 147 assisted living units; 75 independent living units and 10 duplex units.

Three BMP basins and 139 parking spaces would be provided onsite. A sidewalk would be constructed along SR 94, and a pedestrian trail would connect the western end of the retirement center to Via Mercado. All fuel management will be onsite. Two duplex units will utilize approved building materials and/or windows to withstand direct exposure to heat/fire in order to reduce fuel management impacts to nearby biological resources.

Eastbound access would be provided from the existing church driveway at a signalized intersection on Campo Road. Westbound access would be provided at the same intersection, and secondary access would be at another existing driveway just east of the church, through the church parking lot. This access point would also allow right turns only for vehicles exiting the retirement center. In addition to the proposed basement parking spaces in Wing 3, parking spaces would be provided off the main internal driveway for employees, visitors, and residents. Additional spaces would be provided at the duplexes for residents and visitors, for a total of 139 parking spaces onsite.

## **Project Location and Setting**

The Site is located on Assessors' Parcel Numbers (APN) 506-140-06 and APN 506-140-07 within the County of San Diego (County), near the community of Rancho San Diego south of the City of El Cajon. The Site is directly adjacent to SR 94 (Campo Road) at the intersection of SR 94 and Via Mercado Drive. A map of the regional location is provided in **Figure 1**, and the Site location and vicinity are illustrated on United States Geological Survey (USGS) 7.5' topographic quadrangle map(s) in **Figure 2**.

Land uses in the immediate Project vicinity include multi- and single-family residential development to the north and northeast, commercial uses to the west, the existing Skyline Church and parking areas to the east, and a San Diego Gas & Electric (SDG&E) substation and open space across SR 94 to the south.

The Site includes gently sloping terrain, with a high point of approximately 550 feet above mean sea level (AMSL) near the northern and northwest boundaries, sloping down toward the south/southeast to a low of approximately 480 feet AMSL along the southern and southeastern sides. A sewer and electrical easement run east-west through the Site.

According to the Soil Survey, San Diego Area, California (Bowman 1973), the Site supports well drained sandy loams consisting of Visalia sandy loam and Friant rocky fine sandy loam, neither of which are known to support soil-edaphic sensitive plant species or habitat communities.

## **REGIONAL CONTEXT**

The Site is located in San Diego County, within the Metro-Jamul-Lakeside segment of the County's Multiple Species Conservation Program (MSCP), and is designated as outside the Pre-Approved Mitigation Area (PAMA). The closest PAMA is adjacent to the Project boundary to the east/northeast and encompasses preserved coastal sage scrub, as well as former habitat areas now occupied by the existing Skyline Church structures and associated parking lots (**Figure 3**).

The current General Plan Designation of the Site is Open Space Conservation (OS-C), and the proposed General Plan Amendment would change that to Village Residential 30 (VR-30). Current zoning for the Site is Transportation and Utility Corridor (S94), and the proposed rezone would change it to Urban Residential (RU). The County's General Plan Conservation Element includes Resource Conservation Area (RCA) overlays which require special design considerations. The Project site is located within the Valle de Oro Community Plan, which designates nine overlays, one of which includes the Project Site: RCA 75, Campo Creek.

Biological Open Space Easements within PAMA exist within 200 feet east of the Project Site, adjacent to the Skyline Church parking lot. In addition, San Diego National Wildlife Refuge is 1.2 miles southeast of the Project Site adjacent to the Sweetwater Reservoir. This 11,000+-acre preserve was established in 1996 by the U.S. Fish and Wildlife Service in 1996 as a contribution to the MSCP, and supports a number of federal-listed Threatened and Endangered species. Approximately 1,800 acres of the preserve are within the adjacent Rancho San Diego Specific Plan Area.

## **HABITATS / VEGETATION COMMUNITIES**

Existing habitats and other biological resources on the Project Site were investigated through field surveys and literature review by REC biologists.

## Methodology

Literature review consisted of a search and review of California Natural Diversity Data Base (CNDDB, 2014) records of rare and special-status plant and animal species within the Project USGS 7.5' quadrangle (Jamul Mountains) and adjacent quadrangles (La Mesa, El Cajon, Alpine, National City, Dulzura, Imperial Beach, Otay Mesa, and Otay Mountain), review of SanBIOS special-status animal records within a 5-mile radius of the Site (County of San Diego 2014), review of the 1995 Sweetwater Environmental Biologists Inc. biological resources report for the Skyline Church site (Sweetwater 1995), recent and historical aerial photographs of the Site and surrounding areas, and soil maps and descriptions from the United States Department of Agriculture (USDA) Soil Survey, San Diego Area, California (Bowman 1973).

A general survey of the Project Site was conducted by REC Biologists Catherine MacGregor, Lee BenVau and Allison Sharpe to document current biological resources, including plants, animals, and habitats. Elyssa Robertson (Permit # TE786714-1), performed presence/absence surveys for the California gnatcatcher (*Poliophtila c. californica*); see Table 1, below.

Field notes were maintained by REC biologists throughout the surveys. All onsite habitats were mapped, and all observed plant and animal species were documented. Plant species that could not be identified in the field were collected for later identification, and wildlife species were identified directly by sight or vocalizations and indirectly by scat, tracks, burrows, or nests. All observed special-status species were documented and mapped, and suitability of habitat for special-status species was evaluated. Habitats and wildlife on surrounding adjacent offsite properties were observed from the Site or public roadways. Mapping of existing resources on the Project Site was conducted on an aerial photograph scaled at 1 inch = 200 feet.

Scientific nomenclature and common names for animal species in this letter report follow American Ornithological Union (AOU 2012) for birds, Center for North American Herpetology (CNAH 2013) for reptiles and amphibians, Baker et al. (2003) for mammals, and Powell and Hogue (1979) for insects, as well as the San Diego Natural History Museum butterfly, spider, amphibian, reptile, bird and mammal checklists for subspecies (SDNHM 2002, 2005, and undated). Taxonomy and scientific nomenclature for plants follow the Jepson Manual, second edition (Baldwin et al. 2012) and common names are primarily from Rebman and Simpson (2006), with some rare plant common names from the California Native Plant Society (CNPS) Rare Plant Inventory (CNPS 2013).

Table 1 summarizes the survey types, dates, times, temperature conditions, sky conditions, and wind speeds during the general and focused surveys for the Project.

**Table 1. Surveys Conducted on the Project Site**

Date	Time	Temp (°F)	Sky	Wind	Survey Type	Personnel
06/05/14	0700 - 0930	68 - 74°	Clear	Calm	California Gnatcatcher	Elyssa Robertson
06/11/14	0830 - 1030	66 - 72°	Clear	Slight Breeze	California Gnatcatcher	Elyssa Robertson

Date	Time	Temp (°F)	Sky	Wind	Survey Type	Personnel
06/26/14	0730 - 0930	68 - 75°	Clear	Calm	California Gnatcatcher	Elyssa Robertson
07/11/14	0900 - 1255	72 - 85°	Clear	Calm	General Survey, Habitat Mapping	Catherine MacGregor, Lee BenVau, Allison Sharpe
2/25/16	0843 - 1115	63 - 69°	Clear	0 - 2 MPH	Spring Plant Survey	Catherine MacGregor, Lee BenVau
11/16/16	1155 - 1215	70s	Clear	0 - 1	Drainage assessment	Catherine MacGregor
02/21/17	0800 - 1100	59 - 74°	Clear	0, 1.4 - 3.9 MPH	California Gnatcatcher	Catherine MacGregor, Elyssa Robertson
03/20/17	0820 - 0950	59 - 60°	Overcast	0 - 0.5, 0 - 1.0 MPH	California Gnatcatcher	Catherine MacGregor, Elyssa Robertson
04/05/17	0955 - 1045	75 - 79°	Clear	0 - 1.2, 0.8 - 2.9 MPH	California Gnatcatcher	Catherine MacGregor, Elyssa Robertson

Because suitable coastal sage scrub habitat is present on the Site, focused California gnatcatcher presence/absence surveys were conducted. In 2014, three surveys were conducted on foot, at least one week apart within the coastal sage scrub habitat on the Project Site. Appropriate habitat surrounding the Project Site was also assessed. All surveys were conducted during favorable weather conditions between 6:00 AM and 12:00 PM. The entire property was surveyed on foot and all avian species detected were identified directly by sight and/or vocalizations. No territory mapping, handling, or banding was conducted. Recorded vocalizations of the California gnatcatcher were played to elicit an initial response. The 2014 report is provided in **Appendix A**. In 2017, the same survey protocol was followed.

### General survey results:

During REC's Site surveys, two vegetation communities/habitats and one other land cover category were observed: coastal sage scrub, non-native grassland, and disturbed land. These habitats are shown in **Figure 4** and are described below. All observed plant species are listed in **Appendix B**, and all observed wildlife species are listed in **Appendix C**.

Diegan coastal sage scrub: coastal form (County Habitat Code 32510, Tier II) is mapped on approximately 7.1 acres onsite. This habitat is characterized by "Low, soft-woody subshrubs (to ca. 1 m high) that are most active in winter and early spring. Many taxa are facultatively drought-deciduous. Dominated by *Artemisia californica* and *Eriogonum fasciculatum* together with *Malosma laurina*, *Salvia apiana* and *Salvia mellifera*. Stem- and leaf-succulents, while present, are not nearly as conspicuous as in Maritime Succulent Scrub (32400)." Diegan coastal sage scrub typically occurs on low moisture-availability sites such as steep, xeric slopes or clay-rich soils that are slow to release stored water and intergrades at higher elevations with several chaparral habitats. (Oberbauer et al. 2008)

Onsite coastal sage scrub habitat is extensively bisected by numerous dirt roads and easements and is dominated by coastal sagebrush (*Artemisia californica*) and inland California buckwheat (*Eriogonum fasciculatum* var. *foliolosum*). Other native members of the sage scrub community onsite include San Diego sunflower (*Bahiopsis laciniata*), coast cholla (*Cylindropuntia prolifer*), laurel sumac (*Malosma laurina*), wild-cucumber (*Marah macrocarpa*), coastal

wishbone plant (*Mirabilis laevis* subsp. *crassifolia*), and white sage (*Salvia apiana*). Habitat quality varies from moderate in less disturbed areas, to low where it occurs in a disturbed condition in small patches surrounded by heavily compacted dirt roadways/trails. Diegan coastal sage scrub habitat includes the drainage channel near the eastern corner of the site, which does not support distinct separate habitat and is discussed in the Jurisdictional Wetlands and Waterways section below. The MUP area also includes 0.2 acre of coastal sage scrub offsite.

Wildlife species observed in coastal sage scrub onsite included Anna's hummingbird (*Calypte anna*), bushtit (*Psaltirparus minimus*), California towhee (*Melospiza crissalis*), wrenit (*Chamaea fasciata*), coyote (*Canis latrans*) [scat] and desert cottontail (*Silvilagus audubonii*).

Non-native grassland (County Habitat Code 42200, Tier III) covers approximately 0.3 acre onsite. This habitat consists of "A dense to sparse cover of annual grasses with flowering culms 0.2-0.5 (1.0) m high. Often associated with numerous species of showy-flowered, native annual forbs ("wildflowers"), especially in years of favorable rainfall. In San Diego County the presence of *Avena*, *Bromus*, *Erodium*, and *Brassica* are common indicators. In some areas, depending on past disturbance and annual rainfall, annual forbs may be the dominant species; however, it is presumed that grasses will soon dominate. Germination occurs with the onset of the late fall rains; growth, flowering, and seed-set occur from winter through spring. With a few exceptions, the plants are dead through the summer-fall dry, persisting as seeds. Remnant native species are variable. This can include grazed and even dry-farmed (i.e., disked) areas where irrigation is not present." Non-native grassland typically occurs on fine-textured, often clay soils that are moist or even waterlogged during the winter and very dry during the summer and autumn. (Oberbauer et al. 2008)

Onsite non-native grassland occurs in several isolated patches and is dominated by red brome (*Bromus madritensis* subsp. *rubens*), filaree (*Erodium* sp.), short-pod mustard (*Hirschfeldia incana*), and tocalote (*Centaurea melitensis*); with scattered native shrubs such as coastal sagebrush. Grass and forb cover is fairly dense. The MUP area also includes 0.3 acre of non-native grassland offsite.

Wildlife observed in and over non-native grassland onsite included black phoebe (*Sayornis nigricans*), lesser goldfinch (*Spiza psaltria*), house finch (*Haemorrhous mexicanus*), and mourning dove (*Zenaida macroura*).

Non-native grassland is considered sensitive by the County because of its importance for foraging raptors. The non-native grassland habitat onsite supports a few of the native herbs that would make it more valuable as wildlife habitat, such as coast range melic (*Melica imperfecta*), and herbaceous perennials from bulbs; however, it has little conservation value because it is relatively small and isolated from larger habitat areas.

Disturbed land (County Habitat Code 11300, Tier IV) is mapped on approximately 1.4 acres onsite. This land cover category is comprised of "Areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association, but continues to retain a soil substrate. Typically vegetation, if present, is nearly exclusively composed of non-native plant species such as ornamentals or ruderal exotic

species that take advantage of disturbance, or shows signs of past or present animal usage that removes any capability of providing viable natural habitat for uses other than dispersal. Examples of disturbed habitat include areas that have been graded, repeatedly cleared for fuel management purposes and/or experienced repeated use that prevents natural revegetation (i.e. dirt parking lots, trails that have been present for several decades), recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old homesites.” (Oberbauer et al. 2008)

Onsite disturbed land consists of unpaved roads, trails, and easements, a bare area including a large dirt pile, and a fenced gravel-lined pen in the southeast corner of the property. These areas of disturbed land have been repeatedly used to the point that the soil has become compacted and vegetation is limited. The large disturbed area and some of the dirt trails resulted from unpermitted clearing of coastal sage scrub habitat and have been mapped as coastal sage scrub based on a Google Earth aerial image dated May 30, 1994, the oldest aerial that could be found with sufficient resolution for vegetation mapping. Species observed growing in disturbed land onsite include some native species such as coastal sagebrush, broom baccharis (*Baccharis sarothroides*), doveweed (*Croton setiger*) and Palmer’s goldenbush, but predominantly non-native species including white tumbleweed (*Amaranthus albus*), tocalote (*Centaurea melitensis*), pampas grass (*Cortaderia selloana*), devil’s thorn (*Emex spinosa*), horehound (*Marrubium vulgare*), Peruvian pepper tree (*Schinus molle*) and Mexican fan palm (*Washingtonia robusta*). The MUP area also includes 0.1 acre of disturbed land offsite.

Wildlife observed on disturbed land included common invertebrates such as honey bees (*Apis mellifera*), and reptiles including orange-throated whiptail (*Aspidoscelis hyperythra*) and western fence lizard (*Sceloporus occidentalis*), among other common species typical of a suburban environment.

The MUP area also includes 0.3 acre of developed land offsite.

## **SPECIAL STATUS SPECIES**

For the purposes of this report, a sensitive or special-status plant or animal is any taxon (species, subspecies, or variety) that is officially listed by the State of California or the federal government as Endangered, Threatened, or Rare, or a candidate for one of those listings; classified as Fully Protected, Species of Special Concern, or Watch List animal species by the California Department of Fish and Wildlife (CDFW); included in California Rare Plant Ranks (CRPR) 1 through 4; or included in the County of San Diego Sensitive Plant Lists A through D or Sensitive Animals Groups A or B.

Lists of special-status plants and animals with the potential to occur on the Project Site were generated from the CNDDDB RareFind5 database, SanBIOS database (County of San Diego 2011), and a list provided by the County of San Diego. The resulting lists include any special-status species documented within the Project Site’s USGS 7.5’ quadrangle (Jamul Mountains) and adjacent quadrangles (La Mesa, El Cajon, Alpine, National City, Dulzura, Imperial Beach, Otay Mesa, and Otay Mountain), within an elevation range of 500-700 feet, as well as any other species requested by the County for this Project. **Appendix D** provides information on these

special-status plant species, as well as an evaluation of the potential for each species to occur onsite, based on CNDDDB search results, the CNPS Inventory of Rare and Endangered Plants (online version, 2013), Reiser's Rare Plants of San Diego County (2001), other biological reports conducted in this area, professional botanical experience, and field observations. **Appendix E** provides information on these animal species, and an evaluation of the potential for each species to occur onsite, based on species requirements, CNDDDB and SanBIOS search results, other biological reports conducted in this area, and field observations.

### **Special-status Species Observed on the Project Site**

Two special-status plant species and two special-status animal species were observed onsite by REC: Palmer's goldenbush, San Diego sunflower, California gnatcatcher, and orange-throated whiptail. In addition, evidence of past use by San Diego desert woodrat (*Neotoma lepida intermedia*) was also observed. These species are shown in **Figure 4** and are described below.

Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) is an aromatic evergreen shrub. This species is not listed by the state or federal agencies but is considered a California Rare Plant Rank (CRPR) 1B.1 and County List B species, and is a County Narrow Endemic. List B Narrow Endemics are afforded a higher conservation level than species on List C or D. These are plant species whose range is very limited or population size is very diminished. There were 40 individuals of this species observed on the property. Although rare throughout the County, the population of this species in the Project Site's vicinity is robust. It has been documented both east of Skyline Church as well as south of SR 94 (Campo Road). CNDDDB lists over 300 individuals documented in 1982 at the intersection of Jamacha Boulevard and SR 94 at the location of a Caltrans road-widening project. This area has since been placed in open space in conjunction with the road widening as well as construction of Skyline Church. Visual observations confirm that a substantial population of this plant occurs in undeveloped areas to the south of SR 94. REC biologists surveyed Palmer's goldenbush on two potential mitigation parcels located south of SR 94 along a tributary to the Sweetwater River. The plants were too abundant and dense for a complete count, but based on sampling of high-density groups where Palmer's goldenbush was at least 80% of total cover, an estimated 1,744 individuals were growing within just those high density areas. Many more uncounted plants were observed outside the high-density areas but were primarily located within broom baccharis dominated coastal sage scrub. The 40 individuals on the Project Site clearly represent less than 1% of the overall local population of Palmer's goldenbush in the vicinity. The individuals onsite would be considered outliers to the main population of this plant along the tributary to the Sweetwater River.

San Diego sunflower (*Bahiopsis laciniata*) is not state or federally listed but is a County List D species. List D species are more abundant than List A, B, or C species but may be regionally declining. San Diego sunflower occurs densely in two large patches mixed with other coastal sage scrub species and occurs sparsely throughout the other areas onsite. San Diego sunflower is a common component of scrub habitats in eastern and southern San Diego County. On the Project site, it occurs as a common component of coastal sage scrub in a location near the northeastern property boundary, and another location at the northwestern end of the site.



California gnatcatcher (*Polioptila c. californica*) is a small gray songbird that resides year-round in scrub-dominated plant communities from southern Ventura County southward through Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties, California into Baja California, Mexico. It is strongly associated with sage scrub in its various forms. The range is almost entirely limited to coastal lowlands below 1,000 feet in elevation (Unitt 2004). This gnatcatcher is a State Species of Special Concern and is federally listed as Threatened; the County of San Diego lists it as a Group 1 sensitive wildlife species. California gnatcatcher was documented on the adjacent Skyline Church site prior to its development. Because suitable habitat occurs on the Site and the gnatcatchers have been documented nearby, REC conducted a breeding season protocol survey in 2014 (see report in **Appendix A**). No gnatcatchers were detected onsite at that time, nor during field work in February and November of 2016. However, County Adjunct Senior Biologist Dale Ritenour visited the Site in June 2016 and observed a gnatcatcher onsite. Based on this observation, a second protocol breeding season survey was conducted in spring 2017. In the 2017 survey, one pair of gnatcatchers was found onsite. The male was observed during each of the three site visits, and the female was observed only on the first visit. The 2017 survey results are provided in the gnatcatcher survey report in **Appendix F**.

Orange-throated whiptail (*Aspidoscelis hyperythra*) is not state or federal listed but is a County Group 2 species. This lizard lives in semi-arid brushy areas west of the Peninsular ranges that typically have loose soil and rocks, including washes, rocky hillsides, and coastal chaparral and scrub. One individual was observed on one of the disturbed roads onsite and another was observed in coastal sage scrub in the central western portion of the Project Site.

San Diego desert woodrat (*Neotoma lepida intermedia*) is listed by CDFW as a Species of Special Concern. This designation applies to vertebrate species that have experienced declining population levels, have limited ranges, and/or are exposed to other continuing threats that have made them vulnerable to extinction. San Diego desert woodrat occurs in coastal sage scrub, oak woodland and chamise chaparral, especially where the vegetation is moderate to dense. This nocturnal species prefers habitats with rocky slopes, rock outcrops, and cacti. Two disintegrated woodrat middens were observed onsite by REC and Mr. Ritenour, within cholla patches. Due to their locations with cholla, they were most likely built by San Diego desert woodrat. Their disintegrated condition suggests that they have not been active for some time. It appears that San Diego woodrat does not currently occur onsite, likely as a result of increased habitat fragmentation after the adjacent Skyline Church project was developed. In **Appendix E**, its potential to occur onsite is listed as high to reflect its former presence but apparent current absence.

### **Special-status Species with High Potential to Occur on the Project Site**

Based on CNDDDB and SanBIOS records searches, review of the 1995 Skyline Church biological resources report, results of REC's 2014-2017 surveys, County biologist onsite observations, and evaluation of current Site conditions, San Diego desert woodrat (see above) is the only additional special-status species with high potential to occur onsite.

## Other Special-status Species

Quino checkerspot butterfly (*Euphydryas editha quino*) is a federal Endangered, County Narrow Endemic and County Group 2 species. This butterfly inhabits grassy openings within other habitats such as coastal sage scrub that support its larval host plants, primarily dot-seed plantain (*Plantago erecta*) and desert plantain (*P. patagonica*), but also Coulter's snapdragon (*Antirrhinum coulterianum*), rigid bird's beak (*Cordylanthus rigidus*), owl-clover (*Castilleja exserta*), and Chinese houses (*Collinsia heterophylla*). Although the Site is outside of the USFWS Quino checkerspot recommended survey area, the butterfly has been observed as near as two miles away from the Site and potentially suitable coastal sage scrub occurs onsite. However, because none of the larval host plants were observed onsite during the later winter, spring, and summer surveys when these annual species would have been detectable, and no host plants aside from an unidentified Indian paintbrush/owl-clover (*Castilleja* sp.) were documented in the *Skyline Wesleyan Church Biotechnical Report* (Sweetwater Environmental Biologists, Inc. 1995), Quino checkerspot butterfly is not expected to occupy the Site.

## Raptor Foraging and Migratory Birds

Raptors are protected under California Fish and Game Code Section 3503.5, which specifically protects all birds in the orders Falconiformes or Strigiformes (raptors, including owls and turkey vultures). It is unlawful to take, possess or destroy any such raptors or their nests and eggs except as otherwise provided in the Fish and Game Code. The County of San Diego (2010a) defines raptor foraging habitat as "Land that is a minimum of 5 acres (not limited to project boundaries) of fallow or open areas with any evidence of foraging potential (i.e., burrows, raptor nests, etc.)." Because the Project is larger than 5 acres, supports suitable prey species for raptors, and one red-tailed hawk (*Buteo jamaicensis*) was observed flying over the Site, the Project meets the County's definition of raptor foraging habitat. Although no evidence of raptor nesting was observed, the onsite and nearby trees could serve as potential nesting sites.

California Fish and Game Code Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant to the Code, and the federal Migratory Bird Treaty Act prohibits the killing or transport of native migratory birds, or any part, nest, or egg or any such bird unless allowed by another regulation (such as for "game" birds). Therefore, all native, non-game birds on the Site, and the nests and eggs of all native non-game birds, are protected during the nesting season even if these birds are not special-status or otherwise protected. Evidence of nesting was detected onsite during the spring 2017 surveys, and the trees and shrubs adjacent to the Site are likely to support nesting.

## Large Mammal Use/ Wildlife Corridor

No evidence of use by large mammals including mule deer (*Odocoileus hemionus*) and mountain lion (*Puma concolor*), such as scat or deer laydown areas, was found during REC's surveys, nor were any large mammals reported in the 1995 biological resources report for the Project Site. The Site is likely too isolated and urbanized to support large mammals. In addition, since the Project area is an infill in a developed neighborhood it does not likely serve as a wildlife

corridor. Wildlife would need to traverse large expanses of developed areas (such as the shopping center, housing areas and church) or cross the busy six-lane SR 94 (including a concrete central barrier), which would restrict movement of most wildlife except birds and urban-adapted mammals such as skunks and raccoons.

## JURISDICTIONAL WETLANDS AND WATERWAYS

A deeply incised channel crosses the Site in the northeastern corner. The channel enters the property from the north where it appears to originate from a storm drain under the adjacent residential development, and flows toward the south for approximately 235 feet before entering another storm drain culvert under the adjacent driveway at the southeastern Site boundary. Presumably this culvert drains under the church parking lot and/or driveway, under SR 94 and into Campo Creek<sup>1</sup>. The drainage channel consists of a deeply eroded channel with a sandy soil bottom, bordered by coastal sage scrub. Vegetation on the banks consists of upland species from the adjacent coastal sage scrub habitat. Three arroyo willows (*Salix lasiolepis*) with many dead branches are present at the southeastern culvert; no other riparian vegetation is present onsite. Sparse ruderal species growing in the sandy soil of the channel bottom are predominantly short-pod mustard.

A preliminary jurisdictional assessment including review of historic aerial photographs determined that this channel is a Waters of the U.S., CDFW stream, and Waters of the State, based on the presence of bed and bank and visible indicators of flow (see **Figure 4**).

The drainage was evaluated for potential status as a Resource Protection Ordinance (RPO) wetland. County RPO wetlands are defined in RPO Section 86.602(q) as follows:

Lands having one or more of the following attributes are “wetlands”:

- At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);
- The substratum is predominantly undrained hydric soil; or
- An ephemeral or perennial stream is present, whose substratum is predominantly non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

The only area in the onsite drainage that supports a predominance of hydrophytes is at the location of three arroyo willows immediately upstream of the culvert that carries water offsite. Upstream of that, vegetation consists of non-wetland plants such as short-pod mustard seedlings within the channel, and broom baccharis and other typical coastal sage scrub plants along the sides. The substratum is not predominantly undrained hydric soil. In an ephemeral drainage of this type, periods of inundation are inadequate to create hydric soils. The substratum is not non-soil. The RPO wetland definition is taken from the USFWS definition of wetlands (Cowardin et al. 1979), and the USFWS defines non-soil as a substrate that can't support vascular plant life, such as gravel or rock (USFWS 2016, Cowardin et al. 1979). Growth of upland weeds in the channel indicates that the substrate is soil. Based on this analysis of site conditions, only the

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<sup>1</sup> Local name for the Sweetwater River tributary that parallels SR 94 (Campo Road) in the project area; not connected to Campo Creek, the tributary to the Tijuana River in the area of Campo, California.

patch of three arroyo willows at the downstream culvert (see **Figure 4**) would qualify as RPO wetland, due to predominance of hydrophytes at this location.

The drainage is located outside the MUP boundary in an area protected as “Not a Part.” In the case of a Minor or Major Use Permit, areas designated as “Not a Part” “are protected just as areas within an open space easement” (County of San Diego 2010b). The drainage will also be protected by a buffer of 25 to 50 feet onsite. The drainage RPO wetland area has a buffer of 50 feet onsite. No fuel modification will encroach upon the buffer because the Project design was modified to prevent such an impact (see information on fuel management in the Direct Impacts section below). Through protection as “Not a Part” and establishment of a buffer with no fuel management, the drainage will be protected from Project impacts.

## **OTHER UNIQUE FEATURES / RESOURCES**

The Site does not contain sensitive soils, areas for hill-topping, rock outcrops, or other unique resources except for patches of coast cholla. Mature cholla patches are considered a unique habitat resource because they have limited distribution and can support coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) nesting. (No sign of coastal cactus wren use of the Site was detected nor do they have moderate to high potential to occur onsite.)

## **SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION**

Impacts to biological resources can be categorized as direct, indirect, or cumulative. Direct impacts are a result of Project implementation, and generally include loss of vegetation, special-status habitats, and plant and animal populations; introduction of non-native species which may outcompete and displace native vegetation; activity-related wildlife mortality; loss of foraging, nesting, breeding, or burrowing habitat; and fragmentation of wildlife corridors. Indirect impacts occur as a result of the increase in human encroachment in the natural environment and include off-road vehicle use, which impacts special-status plant and animal species; harassment and/or collection of wildlife species; wildlife predation by domestic animals that intrude into open space areas; and increased wildlife mortality along roads. Cumulative impacts are those impacts that may not be considered significant on a project-specific level can become significant when viewed in the context of other losses in the vicinity of the Project Site.

### **Direct Impacts**

Direct impacts in the MUP area consist of grading, construction, and fuel modification zones (FMZs). FMZs generally extend 100 feet outward from occupied structures, but can be modified based on project design features subject to approval by the local fire authority. Modifications for this Project, as described in the Fire Protection Plan, include of a reduction in width adjacent to sidewalks and roadways, a reduction along the northern property line where areas are currently being maintained by fuel management by adjacent residences, a reduction in the northwestern corner, and a reduction adjacent to the two duplexes in the northeastern portion of the project where FMZs would go offsite or into the drainage buffer. The structures will mitigate the reduction in fuel management by utilizing approved building materials and/or windows to withstand direct exposure to heat/fire, as described in the Project’s April 2018 Fire Protection

Plan. A Fire Protection Plan figure depicting FMZs, including widths and areas of reduced widths, is provided in **Appendix J**. With these modifications, all FMZs are located onsite and outside the drainage buffer. These modifications are reflected in mapping and calculations of direct impacts. Areas at the eastern and western corners of the site that are outside the MUP boundary are “Not A Part” and treated as impact-neutral (not counted as an impact, but cannot be used for mitigation). Existing easements on the site are also treated as impact-neutral areas, in which impacts to underlying habitat are not included as Project impacts.

Implementation of the Project would result in net impacts to 7.6 acres of land, consisting of 5.8 acres of coastal sage scrub, 0.6 acre of non-native grassland, 0.9 acre of disturbed land, and 0.3 acre of developed land within the MUP area (shown in **Figure 5**). Habitat impacts resulting from implementation of the Project are summarized in Table 2a, below. In Table 2a, “gross impact” refers to the Project impact before impact-neutral portions of the impact are subtracted, and “net impact” represents the Project impact after the impact-neutral portion is subtracted from the gross impact. Net direct impacts to 5.8 acres of coastal sage scrub and 0.6 acre of non-native grassland would be significant and require mitigation.

The Project will also directly impact two special-status plant species, two special-status animal species, a unique habitat feature, and raptor foraging habitat.

Impacts to 40 individuals of Palmer’s goldenbush, a County List B and Narrow Endemic species, are considered significant. Section 86.507(a)(1)(b) of the BMO states that “Impacts to Narrow Endemic Plant Species... shall be avoided to the maximum extent practicable.” Based on the distribution of Palmer’s goldenbush as individuals and small patches throughout the Site, avoidance would render development of the Site financially infeasible. The BMO also states that “Where complete avoidance is infeasible, encroachment may be authorized depending on the sensitivity of the individual species and the size of the population except that encroachment shall not exceed 20% of the population on-site.” In the case of this Project, there is no onsite “population” per se; rather, the individuals onsite are part of the larger local population located along, and primarily south of, SR 94. Palmer’s goldenbush seed is distributed when eaten by wildlife including birds, and by clinging to animal fur with minute barbs on the pappus (FNA 2016, Ransom 2016, CNPS 2016). The pappus may also permit limited wind distribution. Given these means of seed dispersal, SR 94 and other nearby roads do not represent the type of barrier that would isolate onsite plants from the larger population and render them a separate population. In considering minimization, the status of onsite plants as a very small part of the larger local population (less than 1% of the number counted on just the proposed mitigation parcels, and not counting the other large patches in the area) indicates that avoiding or minimizing impacts to the onsite plants would be essentially statistically insignificant. Although the Project would remove all the individuals of this plant onsite, the impact to the local population would be much less than 20%. Project impacts would not cause a significant decline of this population in the vicinity. However, this impact would still be considered significant due to the Narrow Endemic status of this species within the MSCP County Subarea Plan, and mitigation would be required.

Impacts to San Diego sunflower are potentially significant and mitigation is proposed. Because impacts to cholla patches could be considered a significant impact to a unique habitat feature, mitigation is proposed.

Impacts to a pair of California gnatcatchers are significant and would require mitigation. Impacts to two orange-throated whiptails are potentially significant and mitigation is proposed. Because San Diego desert woodrat does not appear to currently occupy the site, impacts to this taxon would not be considered significant. Project impacts to raptor foraging habitat are potentially significant and mitigation is proposed.

The Project will not result in significant impacts to any wildlife corridors, linkages, drainages, or wildlife nursery sites.

**Table 2a. Direct Habitat Impacts**

<b>Acres:</b>								
<b>Habitats:</b>	<b>Total Existing Onsite</b>	<b>Gross Onsite Impacts</b>	<b>Impact-Neutral Portion of Onsite Gross<sup>1</sup></b>	<b>Net Onsite Impacts</b>	<b>Gross Offsite Impacts</b>	<b>Impact-Neutral Portion of Offsite Gross<sup>1</sup></b>	<b>Net Offsite Impacts</b>	<b>Total Net Impacts</b>
Diegan coastal sage scrub (Tier II)	7.1	6.1	0.5	5.6	0.2	0.0	0.2	5.6+0.2= <b>5.8</b>
Non-native grassland (Tier III)	0.3	0.3	0.0	0.3	0.3	0.0	0.3	0.3+0.3= <b>0.6</b>
Disturbed land (Tier IV)	1.4	1.3	0.5	0.8	0.2	0.1	0.1	0.8+0.1= <b>0.9</b>
Developed land	0.0	0.0	0.0	0.0	0.3	0.0	0.3	0.0+0.3= <b>0.3</b>
<b>TOTAL</b>	<b>8.8</b>	<b>7.7</b>	<b>1.0</b>	<b>6.7</b>	<b>1.0</b>	<b>0.1</b>	<b>0.9</b>	6.7+0.9= <b>7.6</b>

<sup>1</sup> Project development on existing easements and existing FMZs is Impact Neutral; impact-neutral “Not A Part” areas are not included in this column because they are outside the MUP boundary.

## Indirect Impacts

Indirect impacts may occur as a result of Project development. These could include air pollution, dust, noise, and disturbance during the nesting season. However, the resources in and adjacent to the Project area will be protected from significant indirect impacts by design features and avoidance/mitigation measures that would reduce environmental impacts. These include erosion control measures, dust control, and avoidance of clearing during the bird breeding season.

## Proposed Mitigation

Because the Project would result in significant or potentially significant direct impacts to coastal sage scrub, non-native grassland, Palmer’s goldenbush, San Diego sunflower, cholla patches, California gnatcatcher, orange-throated whiptail, and raptor foraging habitat, mitigation will be required. Mitigation ratios vary depending on the MSCP Tier of the habitat to be impacted and whether or not the impacted land and mitigation site meet the criteria for a Biological Resource Core Area (BRCA). Mitigation ratios are determined based on Attachment M of the County’s Biological Mitigation Ordinance (BMO). BRCA determination for the impact and mitigation sites is provided below.

## BRCA Determination

An **impact site** is a Biological Resource Core Area if it meets at least one of the criteria for a BRCA listed in BMO Section 86.506, which are:

- i) The land is shown as preapproved mitigation area on the wildlife agencies' preapproved mitigation map;  
*The Project Site is not within a preapproved mitigation area (PAMA); does not meet this criterion.*
- ii) The land is located within an area of habitat which contains biological resources that support or contribute to the long-term survival of Sensitive Species, which determination is based on a biological analysis approved by the director, and is adjacent or contiguous to preserved habitat that is within the preapproved mitigation area on the wildlife agencies' preapproved mitigation map;  
*The Project Site is within an area that contains coastal sage scrub habitat, which supports the long-term survival of California gnatcatcher and other sensitive species, and is functionally contiguous to preserved coastal sage scrub in the PAMA on the Skyline Church property for birds such as the gnatcatcher. **The Project Site meets this criterion.***
- iii) The land is part of a regional linkage/corridor...;  
*The Project Site is not a regional linkage/corridor because it is an infill location in a developed neighborhood and is adjacent to a busy road with a central barrier; does not meet this criterion*
- iv) The land is shown on the Habitat Evaluation Map as Very High or High and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as a Biological Resources Core Area;  
*Natural habitat on the Project Site is somewhat isolated because it is surrounded by development, and experiences substantial adverse edge effects due to its location and small size; does not meet this criterion.*
- v) The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of Sensitive Species;  
*The site is not, and is not within, such a block of habitat; does not meet this criterion.*
- vi) The land contains a high number of Sensitive Species and is adjacent or contiguous to surrounding habitats, or contains soil derived from the following geologic formations which are known to support Sensitive Species: A. gabbroic rock; B. metavolcanic rock; C. clay; D. coastal sandstone.  
*Four sensitive species were found onsite, which is not a high number (although it could be considered high for the size and location of the Site; these soils types are not known to occur onsite; does not meet this criterion).*

A **mitigation site** is BRCA if

- i) The land is part of a conservation bank recognized by the Wildlife Agencies as contributing to a HCP/NCCP Plan and located within the MSCP Subarea Boundary Map Area; or

*The mitigation parcels do not meet this criterion.*

- ii) The land meets any or all of the criteria identified in Section 86.506 above.

The mitigation parcels meet the second criterion above:

The land is located within an area of habitat which contains biological resources that support or contribute to the long-term survival of Sensitive Species, which determination is based on a biological analysis approved by the director, and is adjacent or contiguous to preserved habitat that is within the preapproved mitigation area on the wildlife agencies' preapproved mitigation map;

*The mitigation parcels contain coastal sage scrub habitat, which supports the long-term survival of California gnatcatcher and other sensitive species; and riparian woodland, which supports the long-term survival of least Bell's vireo (Vireo bellii pusillus) and other sensitive species. They are also adjacent to the Skyline Church PAMA, which contains coastal sage scrub. Although the mitigation parcels are separated from preserved habitat within the Skyline Church PAMA by SR 94 and the church itself, they are functionally contiguous for birds such as the gnatcatcher. In addition, the mitigation parcels abut a strip of State and County land to the south, which is contiguous to a large block of hardline preserve. **The mitigation parcels meet this criterion.***

Therefore, both the impact site and mitigation sites are BRCAs.

Based on the BRCA status of both the impact area and mitigation areas, and the Table of Mitigation Ratios provided in BMO Attachment M, the required mitigation ratio for coastal sage scrub is 1.5:1, and for non-native grassland is 1:1.

**Table 2b. Mitigation for Habitat Impacts**

Acres:	Total Net Impacts (ac)	Mitigation Ratio <sup>1</sup>	Mitigation Required (ac)	Habitat Available in Mitigation Parcels <sup>2</sup> (ac)	Mitigation Parcel Acreage to be Used for Project Mitigation
Habitats:					
Diegan coastal sage scrub (Tier II)	5.8	1.5:1	8.7	6.6 <sup>3</sup>	6.6 + 2.1 SRW up-tier = <b>8.7</b>
Non-native grassland (Tier III)	0.6	1:1	0.6	0.0	<b>0.6</b> SRW up-tier
Southern Riparian Woodland (Tier I)				7.0	
<b>TOTAL</b>	<b>6.4</b>		<b>9.3</b>		<b>9.3</b>

<sup>1</sup>See ratio determinations above

<sup>2</sup>See Table 3 below

<sup>3</sup>Consisting of 2.2 acres Diegan coastal sage scrub: coastal form (County Code 32510) and 4.4 acres of Diegan coastal sage scrub: baccharis-dominated (County Code 32530); see Table 3 below.



Mitigation for Project impacts to 5.8 acres of Diegan coastal sage scrub at a 1.5:1 ratio would require 8.7 acres of mitigation land. This will be provided through preservation of the 6.6 acres of coastal sage scrub in the mitigation parcels and preservation of 2.1 acre of southern riparian woodland in the mitigation parcels to meet the 8.7-acre requirement through up-tiering. The BMO does not require in-kind mitigation for Tier II coastal sage scrub, and Tier I southern riparian woodland would be used instead.

Mitigation for Project impacts to 0.6 acre of non-native grassland at a 1:1 ratio would require 0.6 acre of mitigation land. This will be provided through preservation of 0.6 acre of southern riparian woodland (up-tiering) in the mitigation parcels.

Additional information on the mitigation land is provided in the “Offsite Mitigation Parcels” section below.

The mitigation parcels will provide mitigation for impacts to approximately 40 Palmer’s goldenbush at a ratio of approximately 44:1 (1,744 individuals counted, see mitigation parcel details below), which is much greater than the required 1:1 ratio.

The mitigation parcels will provide habitat-based mitigation for impacts to San Diego sunflower, orange-throated whiptail, and raptor foraging.

The mitigation parcels will provide mitigation for loss of California gnatcatcher habitat occupied by one pair, through preservation of 6.6 acres of Diegan coastal sage scrub and 2.1 acres of southern riparian woodland in the mitigation parcels. Coastal sage scrub on the western mitigation parcel is gnatcatcher “occupied” – it was in use by a pair of gnatcatchers during the spring 2017 protocol gnatcatcher survey (see following section for more information). Coastal sage scrub on the mitigation parcels continues upslope from the mitigation parcels to County-owned land and hardline preserve land, and the pair observed foraging on the western parcel was also foraging upslope of the parcel. The mitigation parcels also provide non-sage scrub Primary Constituent Elements (PCEs), which are physical and biological features essential to gnatcatcher conservation because they provide additional dispersal, foraging, and ecotone value. Because PCEs include riparian areas, the use of 2.1 acres of southern riparian woodland to fulfill the coastal sage scrub habitat mitigation is appropriate for gnatcatcher impact mitigation as well.

Mitigation for impacts to the unique habitat feature of cholla patches will be provided through salvage of onsite cholla. The USFWS has expressed interest in salvaging mature coast cholla onsite through both cuttings and translocation prior to the clearing of the property. The intent is to utilize the salvaged cacti for restoration and creation of coastal cactus wren habitat within the San Diego National Wildlife Refuge system at the Sweetwater Refuge.

Implementation of the mitigation measures above (in combination with standard avoidance/mitigation measures below) would reduce impacts to coastal sage scrub, non-native grassland, Palmer’s goldenbush, San Diego sunflower, orange-throated whiptail, raptors (foraging), California gnatcatcher, and cholla patches to a level below significant.

## Offsite Mitigation Parcels

Mitigation for significant impacts to coastal sage scrub, non-native grassland, Palmer's goldenbush, San Diego sunflower, orange-throated whiptail, raptor foraging habitat, and California gnatcatcher would be provided within the two mitigation parcels located south of SR 94, south and southeast of the Project site (**Figure 3**). This land is currently owned by Skyline Church but an open space easement has not been placed over it yet. The potential offsite mitigation area consists of west and east parcels (**Figures 7 and 8**) that support the following vegetation communities: Diegan coastal sage scrub: coastal form, Diegan coastal sage scrub: baccharis-dominated, southern riparian woodland, ornamental vegetation, and developed and disturbed lands. Table 3 includes the types of habitats in each mitigation parcel, their respective acreages, and the approximate number of Palmer's goldenbush individuals located there.

**Table 3. Habitat/Vegetation Communities and Palmer's Goldenbush on the Mitigation Parcels**

<b>Habitat/Vegetation (acres)</b>	<b>West Parcel</b>	<b>East Parcel</b>	<b>Total</b>
Diegan Coastal Sage Scrub: Coastal Form	1.0	1.2	<b>2.2</b>
Diegan Coastal Sage Scrub: Baccharis-dominated	3.4	1.0	<b>4.4</b>
Southern Riparian Woodland	2.6	4.4	<b>7.0</b>
Ornamental	0.1	0.0	<b>0.1</b>
Disturbed	0.3	0.8	<b>1.1</b>
Developed	0.1	0.0	<b>0.1</b>
<b>Total</b>	<b>7.5</b>	<b>7.4</b>	<b>14.9</b>
<b>Palmer's goldenbush (number of plants)</b>	<b>West Parcel</b>	<b>East Parcel</b>	<b>Total</b>
Palmer's goldenbush counted in high density groups located in Diegan coastal sage scrub: baccharis dominated	<b>1,410</b>	<b>334</b>	<b>1,744</b>

The western parcel, APN 506-140-08 is designated by the General Plan as Open Space while the eastern parcel, APN 506-140-03, is designated as Specific Plan Area. The western parcel is surrounded by land designated as Open Space to the northwest west, south, and southeast, with Specific Plan Area to the northeast and Public Agency Lands further to the south/southeast. The eastern parcel is adjacent to Open Space to the southwest and west, Public/Semi-public Facilities to the south, northeast and east, Limited Impact Industrial to the north, and Specific Plan Area to the north and northwest. Both parcels are zoned as Open Space (S80). Both parcels will be protected in their entirety with Biological Open Space easements so that they can provide fully protected mitigation land.

The east and west mitigation parcels collectively contain 6.6 acres of Diegan coastal sage scrub, of which 4.4 acres are baccharis-dominated. Those 6.6 will be used for Project coastal sage scrub habitat mitigation. The 2.2 acres of "typical" Diegan coastal sage scrub: coastal form are dominated by coastal sagebrush. The baccharis-dominated Diegan coastal sage scrub is dominated by a combination of broom baccharis and Palmer's goldenbush. As described by Oberbauer et al. (2008), this habitat is often found within other forms of Diegan coastal sage scrub and on upper terraces of river valleys. On the mitigation parcels, it occurs in patches adjacent to the coastal form and adjacent to the riparian woodland (**Figures 7 and 8**).

The parcels collectively contain 7.0 acres of southern riparian woodland. This habitat is characterized by red and black willows (*Salix laevigata*, *S. gooddingii*) with occasional western sycamores (*Platanus racemosa*), and smaller arroyo willows (*S. lasiolepis*) and mule-fat (*Baccharis salicifolia* subsp. *salicifolia*) along the edges. The understory includes poison-oak (*Toxicodendron radicans*), San Diego sedge (*Carex spissa*), and yerba mansa (*Anemopsis californica*). Non-native walnut (*Juglans hindsii*/hybrid), Shamel ash (*Fraxinus uhdei*), Canary Island date palm (*Phoenix canariensis*), Mexican fan palm, and pampas grass occur throughout. 2.3 acres of southern riparian habitat will be used to mitigate (up-tiering) for Project Impacts to coastal sage scrub and non-native grassland. Another 4.7 acres of southern riparian woodland in the offsite parcels will not be needed for Project mitigation. The 4.7 acres will not be used for any other project's mitigation, and will be included within the Biological Open Space Easement for this Project.

Protocol surveys were conducted on the offsite mitigation parcels in 2017. The survey reports are provided in **Appendix G** (west parcel) and **Appendix H** (east parcel). One pair of gnatcatchers was observed in coastal sage scrub on the west parcel, as well as upslope (south) of the west parcel. No gnatcatchers were observed on the east parcel, but additional coastal sage scrub occurs upslope of this parcel as well.

Other special-status species found in the mitigations parcels included six least Bell's vireos, six yellow warblers (*Setophaga aestiva*), orange-throated whiptail, San Diego sunflower, Palmer's sagewort (*Artemisia palmeri*), southwestern spiny rush (*Juncus acutus* subsp. *leopoldii*), and ashy spike-moss (*Selaginella cinerascens*). Preservation of the mitigation parcels will provide the required habitat-based mitigation for orange-throated whiptail and San Diego sunflower, as well as up to 14.9 acres of potential raptor foraging (and nesting) habitat. Ratio-based mitigation (1:1) is required for Project impacts to 40 individuals of Palmer's goldenbush. The two offsite parcels contain a total of approximately 1,744 individuals, which would provide mitigation at a much higher ratio of 44:1.

A conceptual Resource Management Plan has been prepared to address Biological Open Space requirements and details such as fencing, signage and maintenance for the offsite mitigation parcels (Offsite Mitigation Area), and is provided in **Appendix I**.

## **Avoidance Measures**

In addition to the mitigation measures and design features described above, the Project would incorporate these avoidance measures to prevent additional impacts:

- All clearing and grubbing of vegetation and/or grading will occur outside the avian breeding season (February 15 to August 31, or sooner if a qualified biologist demonstrates to the satisfaction of the wildlife agencies that all nesting is complete).
- The drainage, its buffer, and the Not A Part areas shall be clearly demarcated prior to brushing and clearing for avoidance.
- Dust shall be controlled during clearing and brushing in accordance with all applicable air quality regulations.

- Erosion control and water quality protection measures in accordance with County Best Management Practices (BMPs) and the Project's Storm Water Management Plan will be implemented during and after the clearing.

Implementation of these measures will ensure that additional unpermitted impacts to the biological resources on and adjacent to the Site will be avoided.

## CUMULATIVE IMPACTS

Cumulative impacts occur as a result of ongoing direct and indirect impacts for unrelated projects within a geographic area, and are assessed on a regional basis to determine the overall effect of numerous activities on biological resources or a special-status resource over a larger area. When evaluating cumulative impacts, CEQA states that "lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used" (Sec. 15130(b)(3)). The geographic scope for the cumulative impact analysis includes past, present and future development projects (tentative tract maps, major use permits, etc.) within a geographic area sufficiently large to provide a reasonable basis for evaluating cumulative impacts. The geographic scope of the analysis is based on the nature of the geography surrounding the Project Site and the characteristics and properties of each resource and the region to which they apply. In this case, an area with an approximately one (1) mile radius around the Project Site contains residences of the Rancho San Diego community to the north; undeveloped land and then Cuyamaca College to the east; undeveloped land to the south; and undeveloped land and residences of the Spring Valley community to the west. This scope provides a reasonable area, representing the range of local land uses from preserved in natural state to subdivided, in which biological Project-related cumulative effects may be expected to emerge. The analysis utilizes a conservative approach in order to capture the greatest number of projects that have the potential to create cumulatively considerable physical impacts when combined with the Project. A total of 171 County of San Diego projects were reviewed for this cumulative analysis. Cumulative projects are identified below in Table 4 and their locations are shown in **Figure 6**.

As shown in Table 4, 171 cumulative projects occur within the geographic scope of cumulative impact analysis. Of these 171 projects, 26 had an associated CEQA document available for review. Of these 26 CEQA documents, two had sufficient information to determine the acreages of onsite habitat for that project. Neither of these projects impacted habitat that the County considers sensitive. Therefore, cumulative impacts to biological resources in the Project area are below a level of significance for projects with sufficient information to analyze.

**Table 4. Cumulative Projects**

Map ID	Project	Location
1	PRE-APPLICATION MEETING (NO PERMIT)	10808 DEL RIO RD
2	KOECHL TPM	4370 MAYAPAN DR
3	SKYLINE WESLEYAN CHURCH, TM5059	11852 CAMPO RD
4	OSHANA RESIDENCE	4209 DESOTO CT
5	PRE-APPLICATION MEETING (NO PERMIT)	10245 LOMA RANCHO DR

Map ID	Project	Location
6	PRE-APPLICATION MEETING (NO PERMIT)	11330 CAMPO RD
7	KAISER PERMANENTE SPA02-001	3875 AVOCADO BL
8	ENVIRONMENTAL REVIEW (AEIS)	4268 CAM ALEGRE
9	SWEETWATER VILLAGE EAST PRD, P76-040	10591 VILLA BONITA
10	PRE-APPLICATION MEETING (NO PERMIT)	11558 AVNDA MARCELLA
11	PRE-APPLICATION MEETING (NO PERMIT)	10435 CAMPO RD
12	MINOR USE PERMIT	4031 AVOCADO BL
13	PRE-APPLICATION MEETING (NO PERMIT)	10808 DEL RIO RD
14	HOSTETLER MUP	3006 GAYLA CT
15	KAISER-PERMANENE MEDICAL ER	3875 AVOCADO BL
16	ENVIRONMENTAL REVIEW (AEIS)	11210 CAMPO RD
17	SITTO TRUST/SIAL B/A	4141 SUNDOWN LN
18	PRE-APPLICATION MEETING (NO PERMIT)	4031 AVOCADO BL
19	AMER MALIK	NO ADDRESS
20	BURFORD TPM EIR	4410 MAYAPAN LN
21	PRE-APPLICATION MEETING (NO PERMIT)	NO ADDRESS
22	O'CONNOR MINI STORAGE	10549 CAMPO RD
23	TENTATIVE PARCEL MAP	4090 SUNDOWN LN
24	PRE-APPLICATION MEETING (NO PERMIT)	3471 YBARRA RD
25	HONEYCUTT	4109 CTE CENTINELLA
26	SITTO TPM	11080 FURY LN
27	PRE-APPLICATION MEETING (NO PERMIT)	10808 DEL RIO RD
28	PRE-APPLICATION MEETING (NO PERMIT)	3471 YBARRA RD
29	MAJOR USE PERMIT	10245 LOMA RANCHO DR
30	MINOR USE PERMIT	3855 AVOCADO BL
31	MINOR USE PERMIT	3611 AVOCADO BL
32	BOUNDARY ADJUSTMENT W/CERT OF COMPLIANCE	10323 SAN VICENTE BL
33	MINOR USE PERMIT	3607 AVOCADO BL
34	MAJOR USE PERMIT	3686 EL CANTO DR
35	FOOTHILLS UNITED METHODIST CHURCH	4031 AVOCADO BL
36	SITE PLAN	10905 HANSOM LN
37	SPRINT PCS ZAP	NO ADDRESS
38	ENVIRONMENTAL REVIEW (AEIS)	NO ADDRESS
39	ADMINISTRATIVE PERMIT	10424 RANCHO RD
40	EXPLORER ROAD	11320 EXPLORER RD
41	NEXTEL COMMUNICATIONS	3686 EL CANTO DR
42	PRE-APPLICATION MEETING (NO PERMIT)	10808 DEL RIO RD
43	PACIFIC BELL RANCHO SAN DIEGO MUP	2966 JAMACHA RD
44	MAJOR USE PERMIT	10435 CAMPO RD
45	PRE-APPLICATION MEETING (NO PERMIT)	3875 AVOCADO BL
46	MINOR USE PERMIT	10764 VIA LINDA VISTA
47	SPRINT PCS ZAP	3607 AVOCADO BL

Map ID	Project	Location
48	MINOR USE PERMIT	11880 CAMPO RD
49	ENVIRONMENTAL REVIEW (AEIS)	3777 AVOCADO BL
50	PRE-APPLICATION MEETING (NO PERMIT)	11229 EXPLORER RD
51	MINOR USE PERMIT	3474 YBARRA RD
52	ELDER AD	4404 TOPA TOPA DR
53	GAMBONI RANCH, TM 5241	11092 FURY LN
54	EXPLORER ROAD, TPM, 2 LOTS	11229 EXPLORER RD
55	CHACON PATIO	3123 VILLA ESPANA
56	LITTLE DOVE CHILDCARE	10341 DEL RIO RD
57	DON PICO 2ND DWELLING MOVE ON	10500 DON PICO RD
58	SMITH ACCESSORY APARTMENT	10721 CHALLENGE BL
59	HARPER CASITA	10655 ITZAMNA RD
60	RANCHO SAN DIEGO WAL-MART	NO ADDRESS
61	RSD TWN CTR YMCA, P96-011W2M3	12006 CAMPO RD
62	FENCE HEIGHT - COLE	11025 MORNING STAR DR
63	CUNNINGHAM SECOND DWELLING UNIT	10511 DEL RIO RD
64	ESTRADA, VICKI	NO ADDRESS
65	WUJCIK ADDITION	3017 VILLA ADOLEE
66	US GAS CARWASH	3520 SWEETWATER SPRING BL
67	KOECHL B/C	NO ADDRESS
68	SAN-537 DIXIE	3607 AVOCADO BL
69	RSD TWN CTR, ALTER TARGET, P96-011W2M5	2911 JAMACHA RD
70	CINGULAR WIRELESS ZAP	NO ADDRESS
71	MERRILL GARDENS AT RANCHO SAN DIEGO	NO ADDRESS
72	CHRISTOPHER L. CROSKREY	10847 HANSOM LN
73	SANDY RESIDENCE	10627 EUREKA RD
74	RSD TWN CTR, YMCA P96-011W2M5	12006 CAMPO RD
75	SKYLINE WESLYAN CHURCH, P88-039W3M5	11330 CAMPO RD
76	DUBUIS B/C	4166 NABAL DR
77	RSD TWN CTR, YMCA TRAILER, P96-011W2M6	12006 CAMPO RD
78	OSHANA BC	4212 DESOTO CT
79	HARPER 2ND DU/ZAP MODIFICATION	10655 ITZAMNA RD
80	IHOP RESTAURANT/REMODEL	3637 AVOCADO BL
81	RSD TOWNE CTR, BLDG 18, P96-011W2M6	2963 JAMACHA RD
82	I-HOP DOUBLE POLE SIGN P79-011W1M5	3637 AVOCADO BL
83	RANCHO SAN DIEGO VILLAGE BLDG EXPANSION	3753 AVOCADO BL
84	RSD TOWNE CTR, ATM	2883 JAMACHA RD
85	RSD TOWNE CTR, BLDG6 SIGNS, P96-011W2M8	2935 JAMACHA RD
86	SKYLINE CHURCH MINOR PRE-APP; PRE-APP 08	11330 CAMPO RD
87	YMCA, MINOR DEVIATION, P96-011W2M9	CAMPO RD
88	REGENCY CENTERS, MUP MINOR DEVIATION, P	3777 AVOCADO BL
89	AT&T MOBILITY, WIRELESS TELECOM FACILITY	3605 AVOCADO BL

Map ID	Project	Location
90	SKYLINE WESLEYAN CHURCH, P88-039W3M6	10942 CHARING CROSS RD
91	ONIPOINT COMMUNICATIONS CELL SITE MUP;	11019 DEL RIO RD
92	SKYLINE WESLEYAN CHURCH; AD 08-056	11330 CAMPO RD
93	MCGRATH YMCA, CC MERGER; CC 08-0123	12006 CAMPO RD
94	ATTIQ, MAJOR PRE-APP, 3992-08-177	3511 SWEETWATER SPRINGS BL
95	GHIO, MAJOR PRE-APPLICATION MEETING FOR	11880 CAMPO RD
96	CA RANCHO SAN DIEGO VILLAGE DEVIATION ZA	3605 AVOCADO BL
97	WRIGHT CERTIFICATE OF COMPLIANCE 09-0020	3319 CALAVO DR
98	VESTAR CALIFORNIA MINOR DEVIATION 96-011	2987 JAMACHA RD
99	SKYLINE WESLEYAN CHURCH MINOR DEV 89-039	11330 CAMPO RD
100	RANCHO SAN DIEGO SHERIFF STATION AD 09-0	11330 CAMPO RD
101	SAN MIGUEL FIRE TRAINING FACILITY MAJOR	11880 SR-94
102	YMCA MAJOR PRE APP MPA 09-035	12006 CAMPO RD
103	COSD DGS REZONE AND OS VACATION REZ 09-0	CAMPO RD
104	NEIGHBORHOOD NATIONAL BANK MINOR DEVIATI	2987 JAMACHA RD
105	BROWN, BA WITH CC; BC 09-0043	3219 CALAVO DR
106	RAM CENTERS MINOR DEVIATION S80-066-02	3855 AVOCADO BLVD
107	FOOTHILLS UNITED METHODIST CHURCH MIN DE	4031 AVOCADO BL
108	HANSSEN REZONE	3663 VIA MERCADO
109	VESTAR, KFC, MUP MINOR DEV, P 96-011-27	2949 JAMACHA RD
110	CA-SDG5817A DIXIELINE LUMBER ZAP 02-002-	3647 AVOCADO BL
111	MUNIOZGUREN, AD OVERSIZED STRUCTURE; AD	3231 SAN CARLOS DR
112	YMCA, MUP MINOR DEVIATION; P96-011-28	12006 CAMPO RD
113	NEXT G AT&T MUP CELL SITE; P10-009	4211 NABAL DR
114	T-MOBILE WEST SD06046 RANCHO SAN DIEGO S	3691 VIA MERCADO
115	ATONEMENT LUTHERAN/AT&T MOD P63-180W2	10245 LOMA RANCHO DR
116	SD34XC140 RANCHO JAMACHA	11880 CAMPO RD
117	AT&T WIRELESS ZAP MOD	3607 AVOCADO BL
118	VESTAR, MINOR DEVIATION P 96-011W3M3	2907 JAMACHA RD
119	RAM CENTERS, STP MINOR DEVIATION S80-066	3815 AVOCADO BL
120	SPARKES GARAGE	4051 CALAVO DR
121	FOOTHILLS UNIT.METHODIST CHURCH	4031 AVOCADO BL
122	FOOTHILLS UNIT.METHODIST CHURCH	4031 AVOCADO BL
123	FOOTHILLS UNIT.METHODIST CHURCH	4031 AVOCADO BL
124	MONTE VISTA BORROW PIT	NO ADDRESS
125	SOUTH COUNTY OPERATIONS CENTER	NO ADDRESS
126	AT&T/ATONEMENT LUTHERAN CHURCH	10245 LOMA RANCHO DR
127	CRICKET COMM- DIXIE LUMBER	3647 AVOCADO BL
128	SWEETWATER VILLAGE EAST PRD	10355 LOMA LN
129	PAWSO DECK EXTENSION	10582 VILLA BONITA
130	LEITCH ROOM ADDITION, P76-040M4	3345 ETON GREENS CT
131	HURGIN ROOM ADDITION	10635 VILLA BONITA

Map ID	Project	Location
132	SPRING ADDITION	10585 VILLA BONITA
133	SOHR ADDITION	10715 VILLA BONITA
134	MARCH 2ND STORY ROOM ADDITION	10894 CHARING CROSS RD
135	STAGGS PATIO ADDITION	10731 VILLA BONITA
136	MERLITO ADDITION	3018 VILLA ADOLLEE
137	MARTINEZ ADDITION	10591 VILLA BONITA
138	CHING ADDITION	10538 PINE GROVE ST
139	HUNTER AUTO YARD	11928 CAMPO RD
140	RSD TOWNE CENTER, BLDG 8, P96-011M1	2895 JAMACHA RD
141	RSD TOWNE CTR, BLDG 14 & 16, P96-011M2	2899 JAMACHA RD
142	SAN MIGUEL FIRE, MUP MINOR DEV P 09-007-	11880 SR-94
143	HOSTETLER ADDITION P78-100AD	3006 GAYLA CT
144	KAISER PERMANENTE OFFICE-PROF, SPA91-002	3875 AVOCADO BL
145	RANCHO SAN DIEGO SPECIFIC PLAN AREA	11757 FURY LN
146	SHEPHERD OF THE VALLEY CHURCH M1	10842 FURY LN
147	SHEPHERD OF THE VALLEY CHURCH M2	10842 FURY LN
148	SHEPHERD OF THE VALLEY CHURCH W1	10842 FURY LN
149	SHEPHERD OF THE VALLEY CHURCH W1M1	10842 FURY LN
150	SHEPHERD OF THE VALLEY CHURCH W2	10842 FURY LN
151	RANCHO SAN DIEGO (SPA83-002)	2984 JAMACHA RD
152	COMMUNICATION CENTER	10836 CALLE VERDE
153	RANCHWOOD COMM PLANED DEVELOPMENT	10850 JAMACHA BL
154	RANCHO SD SHERIFF STATION AD MINOR DEV	0 CAMPO RD
155	SWW JOINT VENTURE	4101 PONCE DE LEON DR
156	SHADOW RANCH	11406 SHADOW RANCH RD
157	RANCHO SAN DIEGO SWTWTR-AVOCADO SP74-001	3517 VIA PALMA
158	SKYLINE WESLEYAN CHURCH MINOR DEV 89-039	11330 CAMPO RD
159	MONTESSORI ACHIEVEMENT CTR	10435 CAMPO RD
160	RSD PVT DEV PLAN, PDP74-006	10502 VIA DEL PARQUE
161	RANCHO SAN DIEGO TOWNE CTR TM5092	2983 JAMACHA RD
162	YMCA, MUP MINOR DEV; P96-011W3M4	12006 CAMPO RD
163	FW CA-RSD VILLAGE, ZAP MOD	3605 AVOCADO BL
164	BROWN, BOUNDARY ADJUSTMENT, 11-0035	3219 CALAVO DR
165	SAN MIGUEL FIRE PROTECTION DISTRICT P 09	11880 SR-94
166	SKYLINE WESLEYAN CHURCH, MINOR DEVIATION	11330 CAMPO RD
167	GHAZAL, ADMINISTRATIVE PERMIT, 11-026	4238 PONCE DE LEON DR
168	BAILEY SELF STORAGE, SITE PLAN D DESIGNA	11852 CAMPO RD
169	MCDONALDS, MUP MINOR DEVIATION, 79-011-0	3781 AVOCADO BL
170	BROWN, TENTATIVE PARCEL MAP, 21194	NO ADDRESS
171	SKYLINE CHURCH, MINOR DEVIATION, 88-039-	11330 CAMPO RD



## CONCLUSION

Implementation of the proposed project would result in significant and potentially significant direct impacts to 5.8 acres of Diegan coastal sage scrub, 0.6 acre of non-native grassland, 40 rare Palmer's goldenbush individuals, San Diego sunflower, unique cholla patches, California gnatcatcher, orange-throated whiptail, and raptor foraging habitat.

Mitigation measures (including avoidance) are summarized below.

- MM-1 The two offsite mitigation parcels shall be placed under a Biological Open Space easement for the Offsite Mitigation Area (OMA).
- MM-2 The approved Resource Management Plan for in-perpetuity preservation and management of the OMA, including funding endowment, shall be implemented.
- MM-3 For coastal sage scrub impacts, 6.6 acres of Diegan coastal sage scrub and 2.1 acres of southern riparian woodland (up-tiering), for a total of 8.7 acres, shall be preserved within the OMA.
- MM-4 For non-native grassland impacts, 0.6 acre of southern riparian woodland (up-tiering) shall be preserved within the OMA.
- MM-5 Approximately 1,744 Palmer's goldenbush individuals (at a much higher ratio than the required 1:1) shall be preserved within coastal sage scrub in the OMA.
- MM-6 For San Diego sunflower, orange-throated whiptail, and raptor foraging habitat, habitat-based mitigation shall be provided in the OMA.
- MM-7 For loss of habitat for a pair of California gnatcatchers, 6.6 acres of Diegan coastal sage scrub that is currently occupied and/or adjacent to additional occupied coastal sage scrub, and 2.1 acres of adjacent southern riparian woodland, a valuable non-sage scrub PCE, shall be preserved within the OMA.
- MM-8 Cholla plants shall be salvaged for coastal cactus wren habitat in the USFWS San Diego National Wildlife Refuge.
- MM-9 All clearing and grubbing of vegetation and/or grading shall occur outside the avian breeding season (February 15 to August 31, or sooner if a qualified biologist demonstrates to the satisfaction of the wildlife agencies that all nesting is complete).
- MM-10 The drainage, its buffer, and the Not A Part areas shall be clearly demarcated prior to brushing and clearing for avoidance.
- MM-11 Dust shall be controlled during clearing and brushing in accordance with all applicable air quality regulations.
- MM-12 Erosion control and water quality protection measures in accordance with County Best Management Practices (BMPs) and the Project's Storm Water Management Plan shall be implemented during and after the clearing.

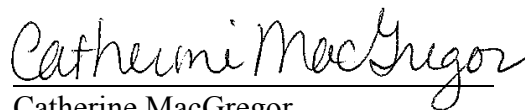
These mitigation/avoidance measures will reduce Project impacts to biological resources to below a level of significance.

This concludes REC's biological letter report for the Skyline Retirement Center Project. Please do not hesitate to contact REC with any questions.

Sincerely,



Elyssa Robertson  
Principal, County QCL Biologist



Catherine MacGregor  
Senior Biologist

## REFERENCES

- AOU (American Ornithologists' Union). 2012. AOU Checklist of North and Middle American Birds (searchable online version). <http://checklist.aou.org/taxa>. Accessed May 2013.
- Baker, R. J., L. Bradley, R. Bradley, J. Dragoo, M. Engstrom, R. Hoffmann, C. Jones, R. Reid, D. Rice, and C. Jones. 2003. "Revised Checklist of North American Mammals North of Mexico, 2003," Occasional Papers 229, December 2003. Lubbock, Texas: Museum of Texas Tech University.
- Bowman, R. H. 1973. *Soil Survey, San Diego Area, California*. United States Department of Agriculture. 104 pp. + appendices.
- CDFW (California Department of Fish and Wildlife). 2013. "Special Vascular Plants, Bryophytes, and Lichens List." CDFW, Natural Diversity Database, July 2013. <http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf>.
- CDFW. 2013a. "State and Federally Listed Endangered and Threatened Animals of California." State of California Natural Resources Agency, Biogeographic Data Branch, California Natural Diversity Database. Sacramento. January 2013.
- CDFW. 2013b. "State and Federally Listed Endangered, Threatened and Rare Plants of California. State of California Natural Resources Agency, Biogeographic Data Branch, California Natural Diversity Database. Sacramento. April 2013.
- CDFW. 2011. "Special Animals." California Department of Fish and Game, Biogeographic Data Branch, California Natural Diversity Database, January 2011. <http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPAnimals.pdf>.
- CNDDB. 2014. California Natural Diversity Data Base RareFind5 searchable database, California Department of Fish and Wildlife, Accessed August 2014.
- CNPS (California Native Plant Society). 2014. Inventory of Rare and Endangered Plants (online edition, v8-02). Sacramento: California Native Plant Society. <http://www.rareplants.cnps.org>. Accessed August 2014.
- CNPS. 2016. Palmer's Goldenbush, *Ericameria palmeri*. [http://calscape.cnps.org/Ericameria-palmeri-\(Palmer's-Goldenbush\)?srchcr=sc583e0261375c5](http://calscape.cnps.org/Ericameria-palmeri-(Palmer's-Goldenbush)?srchcr=sc583e0261375c5)

County of San Diego. 2010. Biological Mitigation Ordinance. Ordinance Nos. 8845, 9246, 9632, and 10039. San Diego County Board of Supervisors. Revised April 2, 2010.

County of San Diego. 2010a. Guidelines for Determining Significance, Biological Resources. Department of Planning and Land Use, County of San Diego. September 15, 2010.

County of San Diego. 2010b. Report Format and Content Requirements, Biological Resources. Department of Planning and Land Use, County of San Diego. September 15, 2010.

County of San Diego. 2014. SanBIOS GIS Database, 2014.

CNAH (Center for North American Herpetology). 2014. "State herpetofauna: California." <http://www.cnah.org/stateList.aspx>. Accessed August 2014.

Cowardin, L. M., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. Washington, DC: Office of Biological Services, US Fish and Wildlife Service.

FNA (Flora of North America) 2016. *Ericameria*. Accessed online at [http://www.efloras.org/florataxon.aspx?flora\\_id=1&taxon\\_id=111990](http://www.efloras.org/florataxon.aspx?flora_id=1&taxon_id=111990)

Holland, R. F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. Non-game Heritage Program, State of California Department of Fish and Game, Sacramento.

Oberbauer, T., M. Kelly, and J. Buegge. 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California", Robert F. Holland, Ph.D., October 1986.

Powell, J. A., and C. L. Hogue. 1979. *California Insects*. Berkeley: University of California Press.

Ransom Seed Laboratory. 2016. *Ericameria palmeri* - intact fruits. Accessed online at [http://www.ransomseedlab.com/genus/photos/e/ericameria\\_palmeri/ericameria\\_palmeri1.htm](http://www.ransomseedlab.com/genus/photos/e/ericameria_palmeri/ericameria_palmeri1.htm)

Rebman, J. P. and M. G. Simpson. 2006. *Checklist of the Vascular Plants of San Diego County*, fourth edition. San Diego: San Diego Natural History Museum. <http://www.sdnhm.org/archive/research/botany/sdplants/index.html>.

Reiser, C. H. 2001. Rare Plants of San Diego County. Imperial Beach, CA: Aquafir Press. <http://sandiego.sierraclub.org/rareplants/>.

SDNHM (San Diego Natural History Museum). 2002. Butterflies of San Diego County. <http://www.sdnhm.org/archive/research/entomology/sdbutterflies.html>. Accessed July 2013.

- SDNHM. 2005. Spiders of San Diego County. <http://www.sdnhm.org/archive/research/entomology/sdspider.html>.
- SDNHM. (Undated) Amphibians of San Diego County. <http://www.sdnhm.org/archive/research/herpetology/sdamphib.html>.
- SDNHM. (Undated) Reptiles of San Diego County. <http://www.sdnhm.org/archive/research/herpetology/sdreptil.html>.
- SDNHM. (Undated) Checklist of Birds Recorded in San Diego County, California. <http://www.sdnhm.org/archive/research/birds/sdbirds.html>.
- SDNHM. (Undated) Checklist of Mammal Species Recorded in San Diego County. <http://www.sdnhm.org/archive/research/birds/sdmamm.html>.
- Stebbins, R. C. 2003. *Field Guide to Western Reptiles and Amphibians*. Boston: Houghton Mifflin Co.
- Sweetwater Environmental Biologists, Inc. 1995. *Skyline Wesleyan Church Biotechnical Report*. August 14, 1995.
- Unitt, P. 2004. *San Diego County Bird Atlas*. San Diego Natural History Museum: San Diego, CA.
- USFWS. 2013. United States Fish and Wildlife Service Endangered Species Database, <http://www.fws.gov/endangered>.
- USFWS. 2016. Wetland Mapping Training, Part 1: Definition of Wetlands. [https://www.fws.gov/habitatconservation/nwi/wetlands\\_mapping\\_training/module2/DW23.html](https://www.fws.gov/habitatconservation/nwi/wetlands_mapping_training/module2/DW23.html)

## PREPARERS

This report has been prepared by REC Consultants, Inc. staff:  
 Elyssa Robertson, Principal Biologist and County QCL Biologist – Primary Author  
 Lee BenVau, Field Biologist – Primary Revising Author and Field Investigator  
 Catherine MacGregor, Senior Biologist and Botanist – Secondary Revising Author and Field Investigator  
 Hedy Levine, Director of the Environmental Division – Project Manager, and Editor  
 Brendan McGill, Andrew Funk, and James Cooper – GIS Analysis

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- Figure 6. Cumulative Analysis Projects
- Figure 7. Offsite Mitigation – West Parcel
- Figure 8. Offsite Mitigation – East Parcel

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- Appendix A. California Gnatcatcher Survey Report for the Skyline Church – Via Mercado [Skyline Retirement Center] Property, 2014
- Appendix B. Plants Observed on the Skyline Retirement Center Project
- Appendix C. Animals Observed on the Skyline Retirement Center Project
- Appendix D. Special-status Plants with the Potential to Occur on the Skyline Retirement Center Project
- Appendix E. Special-status Animals with the Potential to Occur on the Skyline Retirement Center Project
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- Appendix G. 2017 California Gnatcatcher Survey Report for the Skyline Retirement Center *Western* Offsite Mitigation Parcel
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- Appendix I. Conceptual Resource Management Plan
- Appendix J. Fuel Management Areas



# **FIGURES**

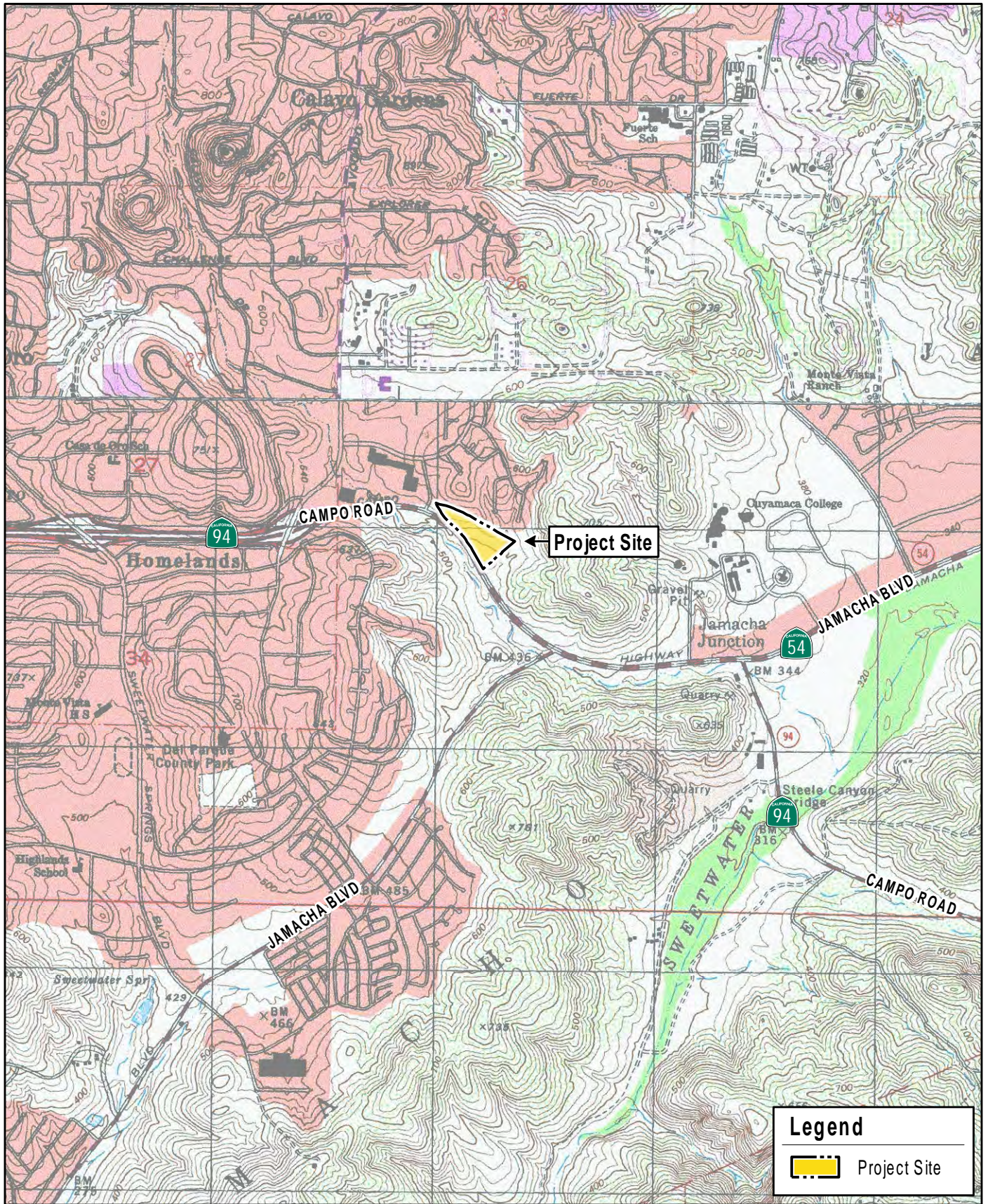










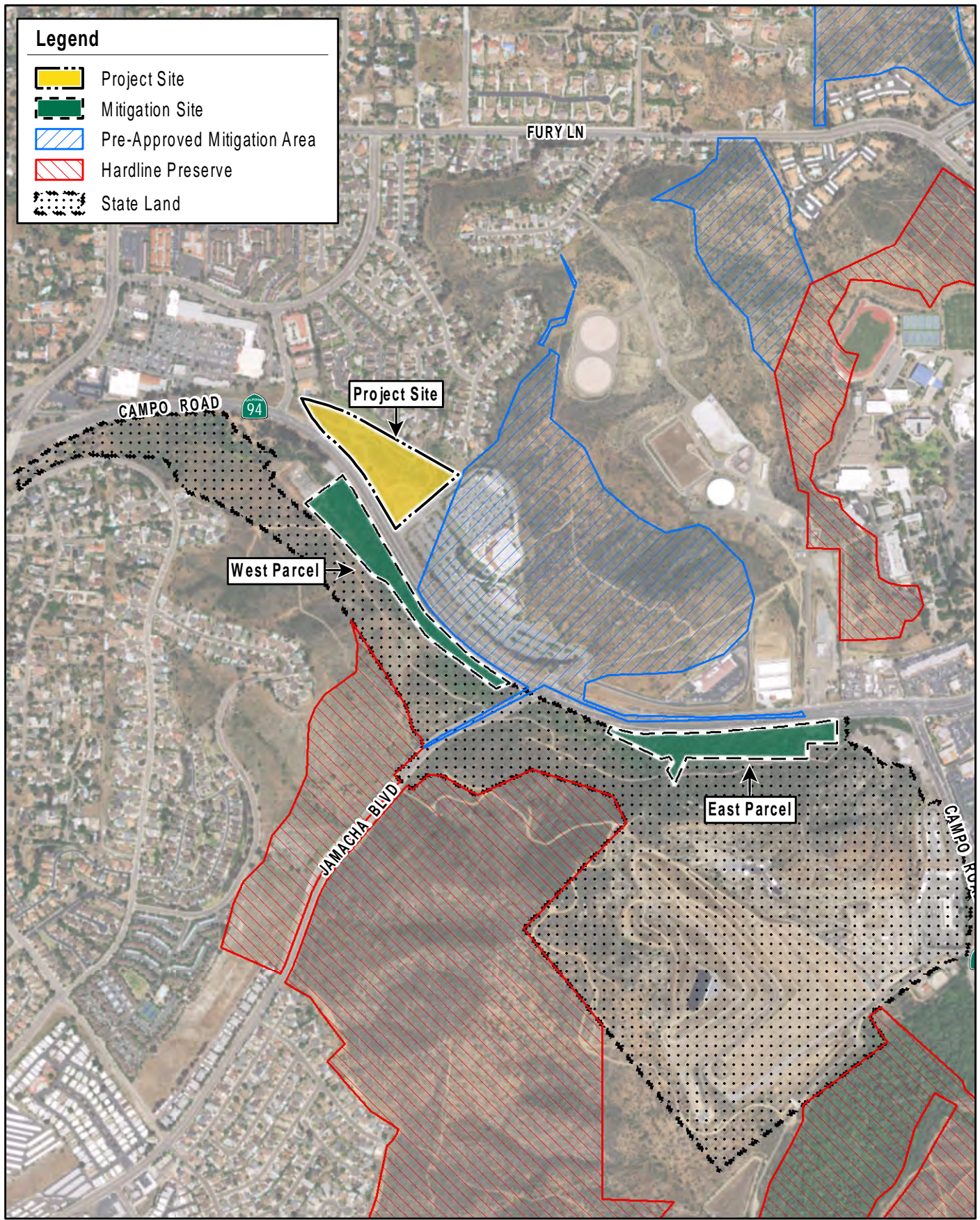


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## MSCP Pre-Approved Mitigation Areas & Hardline Preserve

Consultants, Inc. SKYLINE RETIREMENT CENTER

0 500 1,000 Feet



Data: County of San Diego. Esri Aerial Basemap.

FIGURE 3

September 2017









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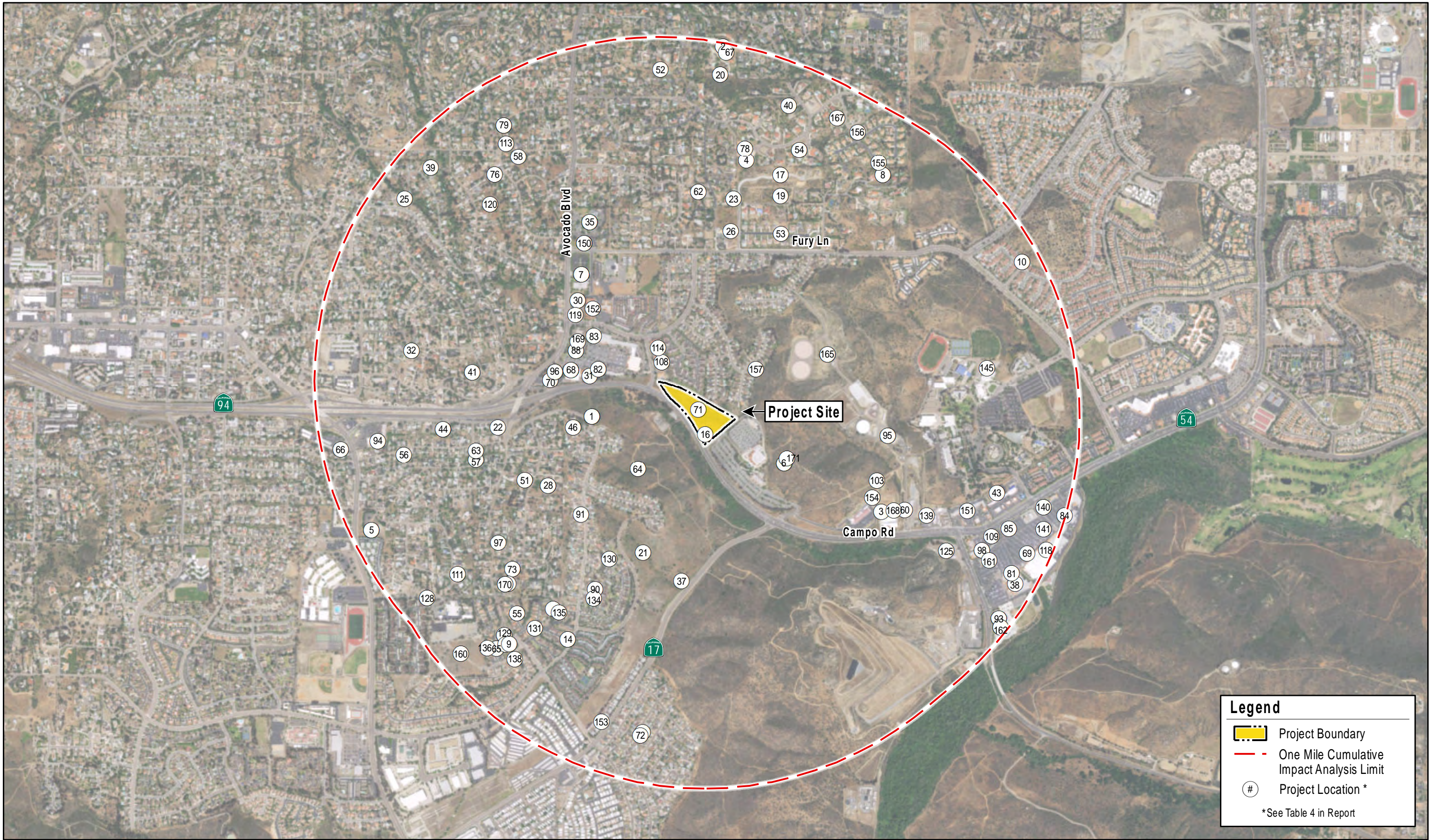


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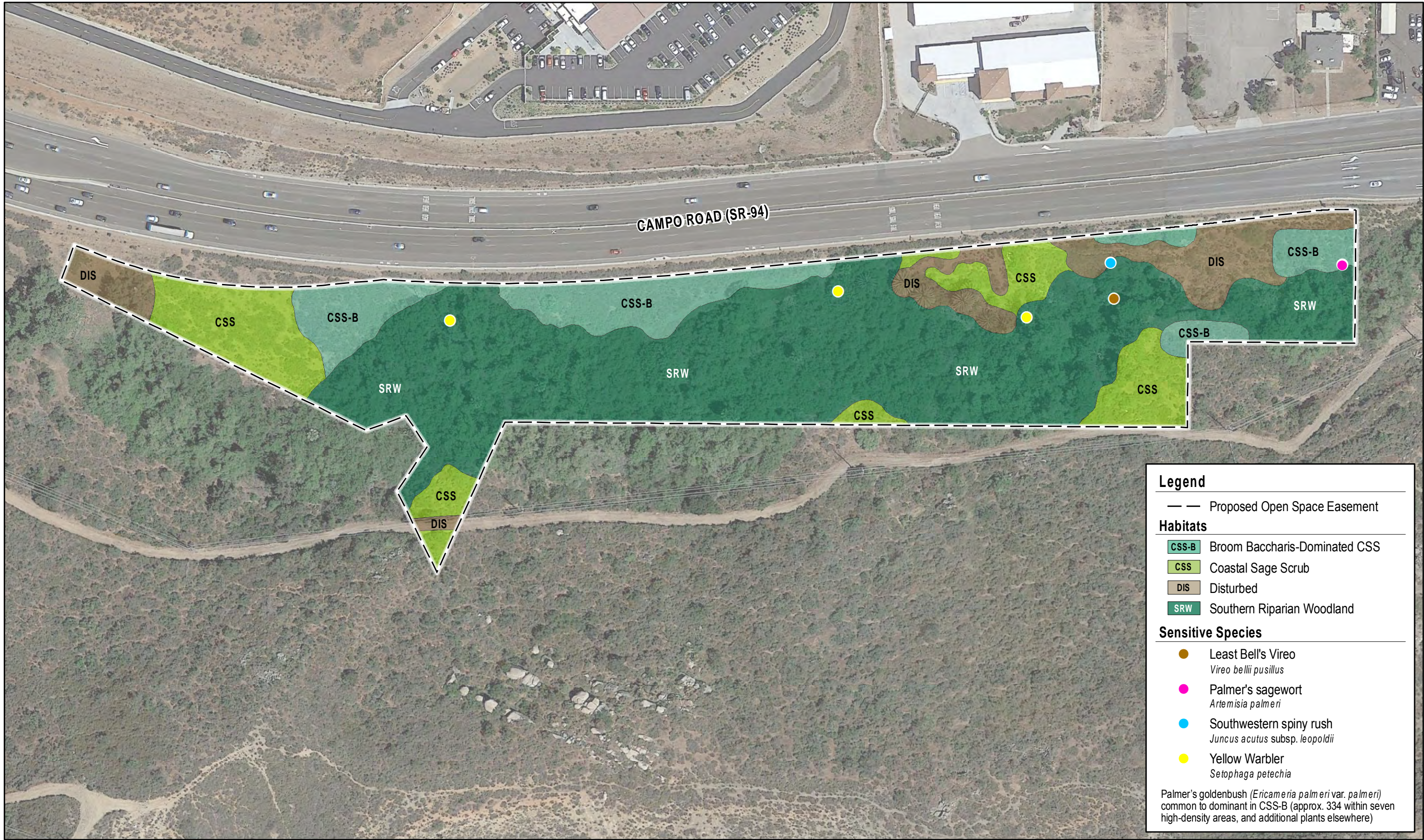


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## **APPENDIX A**

### **California Gnatcatcher Survey Report for the Skyline Church – Via Mercado Property, 2014**





**Civil Engineering • Environmental • Survey**

2442 2<sup>nd</sup> Avenue  
San Diego, CA 92101  
Ph (619) 232 9200 - Fax (619) 232 9210

Consultants, Inc.

August 4, 2014

Stacey Love  
Recovery Permit Coordinator  
Carlsbad Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
2177 Salk Avenue, Ste. 250  
Carlsbad, CA 92008

**Subject: California Gnatcatcher Survey Report for the Skyline Church – Via  
Mercado Property in Rancho San Diego, San Diego County, California  
(USFWS Permit #TE786714-1)**

Dear Ms. Love:

## **Introduction**

The following report details the protocol surveys for the California gnatcatcher (*Poliophtila californica californica*) performed by REC biologist Elyssa Robertson for the 8.9 acre Skyline Church – Via Mercado project site. The project consists of the brushing and clearing of the site for fuel management purposes and the salvage of mature cholla cactus by USFWS Refuges preserve personnel. The parcel contains coastal sage scrub habitat, non-native grasslands and disturbed/developed areas. The County of San Diego has requested the completion of a protocol California gnatcatcher study prior to approval of the brushing and clearing permit.

## **Geographical Limits of the Study Area**

The approximately 8.9 acre site is located in the County of San Diego near the community of Rancho San Diego. The project is the removal of large mature stands of cholla cactus and the brushing and clearing of the property to access the large stands. The property is completely surrounded by development. To the east is Skyline Church and associated parking, to the north are single family homes, to the west is a shopping center and to the south is State Route Highway 94. Campo Creek and undeveloped land occurs south of State Route Highway 94. The property contains coastal sage scrub, non-native grassland and disturbed/developed areas. All habitat within the proximity of the development limits were surveyed for California gnatcatchers.

## Habitats

There are three habitat types onsite: coastal sage scrub, non-native grassland and disturbed developed areas. Each of these areas are described in greater detail below.

Coastal sage scrub occupies 4.7 acres of the site. This habitat is dominated by California sagebrush (*Artemisa californica*), San Diego sunflower (*Bahiopsis laciniata*) and buckwheat (*Erigonium fasciculatum*) with large patches of cholla cactus. The non-native grassland habitat onsite is primarily in four distinct areas but also comprises the understory of the coastal sage scrub habitat onsite. The non-native grassland is dominated by non-native weedy species such as tecolote (*Centauria melitensis*), brome grass (*Bromus sp.*) and mustard (*Hirschfeldia sp.*). The disturbed/developed areas are comprised of a large compacted dirt area, a dirt access for a utility easement as well as several other dirt access trails.

## California Gnatcatcher Survey Methods

The site was surveyed on foot by REC Consultants, Inc. biologist, Elyssa Robertson. Avian species were identified directly by sight or by vocalizations. Field notes were maintained throughout the surveys and species of interest were mapped. No territory mapping, handling, or banding was conducted. Table 1 summarizes the survey dates, personnel, and weather conditions for California gnatcatcher surveys performed onsite.

TABLE 1 SURVEYS CONDUCTED FOR THE VIA MERCADO PROPERTY						
Date	Time	Survey Type	Temp. (°F)	Sky	Wind	Personnel
June 5, 2014	0700-0930	California Gnatcatcher	68-74°	Clear	Calm	Elyssa Robertson
June 11, 2014	0830-1030	California Gnatcatcher	66-72°	Clear	Slight Breeze	Elyssa Robertson
June 26, 2014	0730-0930	California Gnatcatcher	68-75°	Clear	Calm	Elyssa Robertson
July 11, 2014	0900-1255	General Survey, Habitat Mapping	72-85°	Clear	Calm	Catherine MacGregor, Lee BenVau

Three presence/absence surveys for the coastal California gnatcatcher were completed by USFWS permitted biologist Elyssa Robertson. (Permit # TE786714-1). Each survey was conducted at least one week apart, within the coastal sage scrub habitat within the property boundaries and within appropriate habitat surrounding the site. All surveys were conducted during favorable weather conditions. The entire property was surveyed on foot and all avian species observed were noted. Taped vocalizations of the gnatcatcher were played only to illicit an initial response. Sufficient time was spent in all appropriate habitats to determine the presence/absence of the California gnatcatcher. It should be noted that excessive and continuous noise from State Route Highway 94 made vocalization difficult to hear; however the property was traversed sufficiently to visually identify bird species.

## Results

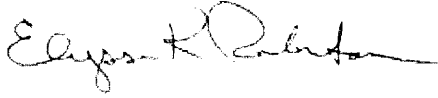
No California gnatcatchers were observed onsite. Habitat onsite is relatively typical for the species; however, it is relatively small and isolated from larger patches of coastal sage scrub by the maritime chaparral to the south. The taped vocalizations and observations resulted in no California gnatcatchers detected onsite or within the habitat adjacent to the site. A complete list of bird species observed onsite is included in the table below.

<p><b>Table 2</b> <b>Avian Species observed onsite</b></p>	
<b>Common Name</b>	<b>Scientific Name</b>
American Crow	<i>Corvus brachyrhynchos</i>
Anna's Hummingbird	<i>Calypte anna</i>
Bewick's Wren	<i>Thryomanes bewickii</i>
Black Phoebe	<i>Sayornis nigricans</i>
Bullock's Oriole	<i>Icterus bullockii</i>
Bushtit	<i>Psaltiriparus minimus</i>
California Quail	<i>Callipepla californica</i>
California Towhee	<i>Pipilo crissalis</i>
Cliff Swallow	<i>Petrochelidon pyrrhonota</i>
Common Raven	<i>Corvus corax</i>
House Finch	<i>Carpodacus mexicanus</i>
Lesser Goldfinch	<i>Carduelis psaltria</i>
Mourning Dove	<i>Zenaida macroura</i>
Northern Mockingbird	<i>Mimus polyglottus</i>
Red Tailed Hawk (overhead)	<i>Buteo jamaicensis</i>
Song Sparrow	<i>Melospiza melodia</i>
Western Scrub Jay	<i>Aphelocoma californica</i>
Wrentit	<i>Chamaea fasciata</i>

It should be noted that California gnatcatchers were observed and noted in the area where Skyline Church is currently constructed (Sweetwater Environmental Biologists 1995). An area of open space to support this species was set aside to the north and east of the existing church. Given that the area is an infill area surrounded by development, highly disturbed with dirt roads and easements and heavily affected by the adjacent State Route Highway 94 noise, it is unlikely that this species would inhabit this property.

This concludes the report for California gnatcatcher surveys on the 8.9 acre Skyline Church - Via Mercado property near Rancho San Diego.

Sincerely,

A handwritten signature in black ink, appearing to read "Elyssa Robertson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

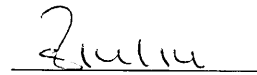
Elyssa Robertson  
Principal Biologist  
**USFWS Permit #TE786714-1**

Skyline Church – Via Mercado Property  
California Gnatcatcher Survey Report

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

A handwritten signature in black ink, appearing to read "Elyssa Robertson", written over a horizontal line.

Elyssa Robertson  
Permit TE-786714-1

A handwritten date "2/11/14" in black ink, written over a horizontal line.

Date







