

**Table 8
CUMULATIVE IMPACTS TO BIOLOGICAL RESOURCES**

MAP REFERENCE NO.	PROJECT NUMBER†	PROJECT NAME	RESOURCE*									
			Riparian/Wetland		CLOW		CSS		SMC		NNG	
			Impacts (I)	Mitigation (M)	I	M	I	M	I	M	I	M
1	GPA 04-007 REZ 04-014 TM 5382	Montiel Heights/ Montiel Road Townhomes	0	0	0	0	0	0	0	0	0	0
2	SP 04-003 GPA 04-004 REZ 04-010 VTM 5365 MUP 04-012 MUP 04-013 MUP 04-014	Harmony Grove Village	3.96	6.80	5.8	17.4	37.6	68.6	3.7	1.9	37.7	18.9
3	--	Marketplace @ Twin Oaks	--	--	--	--	--	--	--	--	--	--
4	ND 12-822	Citywide Channel Maintenance Programmatic Permit	0.71	1.28	0	0	0	0	0	0	0	0
5	MF 1785 TSM 479 MFSCDP 10-51 R 10-146 GV 10-85 CUP 10-835 ND 10-806	Candera	--	--	--	--	--	--	--	--	--	--
6	MF 1392 EIR 03-39	University District Specific Plan	--	--	--	--	--	--	--	--	--	--
7	SCH 92011057	Kaiser Medical Office Building	--	--	--	--	--	--	--	--	--	--
8	--	Leigh Hanson Site	--	--	--	--	--	--	--	--	--	--
9	--	Campus Pointe II	--	--	--	--	--	--	--	--	--	--

**Table 8 (cont.)
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			Impacts (I)	Mitigation (M)	I	M	I	M	I	M	I	M
10	MND 12-820 CUP 12-894	Rancho Coronado Phase I School Site	0.35	0.70	0	0	0.25	--	0.47	--	0	0
11	SUB 09-0002	Kenny Ray Harmony Grove	--	--	--	--	--	--	--	--	--	--
12	ER 2000-34	Harmony Grove Industrial Park	--	--	--	--	--	--	--	--	--	--
13	PHG 11-0038	Hale Avenue Resource Recovery Facility (HARRF) Administration Building	0	0	0	0	0	0	0	0	0	0
14	ER-2006-10	Citracado Parkway Extension	0.71	2.13	0.94	1.7	0.6	0.6	0	0	6.4	4.2
15	File No. 0800-40 PHG 10-0014	Escondido Asphalt Plant Expansion	0	0	0	0	0	0	0	0	0	0
16	2007-25-PD 2005-20-PD	The Point	0	0	0	0	0	0	0	0	0	0
17	2007-18-PD ER 86-43	Springhill Suites by Marriott	0	0	0	0	0	0	0	0	0	0
18	ADM 10-0001 SCH 2009081074	No. Citracado High School/ Del Lago Academy	0	0	0	0	8.1	8.1	0	0	18.1	--

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			Riparian/ Wetland		CLOW		CSS		SMC		NNG	
			Impacts (I)	Mitigation (M)	I	M	I	M	I	M	I	M
19	2001-01-SPA 2005-81-SPA/DA PHG 11-0034 SCH No. 200112106	Escondido Research & Technology Center (ERTC)	1.02	3.06	1.2	3.6	48.4	96.8	0	0	102.8	62.4
Subtotal	--	--	6.75	13.97	7.94	22.7	94.95	174.1	4.17	1.9	165.0	85.5
Proposed Project	SP-13-001 GPA 13-001 STP 13-003 TM 5575 REZ 13-001	Valiano	0.32	0.96	6.7	20.4	1.0	3.6	3.1	1.6	53.8	53.1
TOTAL	--	--	7.07	14.93	14.6	43.1	96.0	177.7	7.3	3.5	218.8	138.6

*CLOW=coast live oak woodland, CSS=coastal sage scrub, SMC=southern mixed chaparral, NNG=non-native grassland

†TM = Tentative Map; TPM = Tentative Parcel Map; MUP = Major Use Permit; ND = Negative Declaration; EIR = Environmental Impact Report; MND = Mitigated Negative Declaration; SPA = Specific Plan Amendment; SCH = State Clearinghouse; -- = Information Not Available or Not Applicable.

3.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

The following mitigation measures (MMs) are recommended to reduce the impacts to special status species to less than significant.

Impact 3.4.1 Implementation of the proposed Project would impact raptor foraging habitat (including Cooper's hawk, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, and turkey vulture), and habitat for grasshopper sparrow, comprised of 53.8 acres of non-native grassland and 20.5 acres of extensive agriculture (pasture).

MM 3.4.1 Mitigation for impacts to non-native grassland habitat (typically a 0.5:1 ratio) must include impacts to sensitive species (grasshopper sparrow and raptors) which increases the mitigation ratio to 1:1, for a mitigation requirement of 53.1 acres¹. Mitigation for impacts to extensive agriculture, which provides more limited habitat value to species, will occur at the base ratio of 0.5:1, for a mitigation requirement of 10.3 acres. Mitigation for impacts to raptor foraging habitat and grasshopper sparrow habitat would occur through one or a combination of the following: off-site preservation of grassland habitat and/or other like-functioning habitat within the NC MSCP PAMA boundaries, or purchase of grassland credits or like-functioning habitat at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 0.6 acre of mitigation for non-native grassland and 10.3 acres of mitigation for extensive agriculture within the Elfin Forest Harmony Grove Community Plan (EFHGCP) shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.

Impact 3.4.2 Construction-related noise may significantly impact tree- or ground-nesting raptors that may be nesting within 300 feet of the construction area such that construction noise at the nest exceeds 60 dB L_{eq}.

MM 3.4.2 No grubbing, clearing, or grading within 300 feet of an active raptor nest during the raptor-breeding season (February 1 to July 15) will occur. As such, all grading permits, improvement plans, and the final map will state the same. If grubbing, clearing, or grading is proposed during the raptor breeding season, a pre-grading survey will be conducted within 3 days prior to clearing to determine if raptors occur within the areas directly impacted by grading or indirectly impacted by noise. If there are no raptors nesting (includes nest building or other breeding/nesting behavior) within this area, development will be allowed to proceed upon approval of the Director of PDS with concurrence from USFWS and CDFW.

¹ 53.1 acres of grassland mitigation would be provided for impacts to 53.8 acres of non-native grassland. The remaining 0.7 acre would be mitigated through oak woodland mitigation, as impacts to 0.7 acre of non-native grassland occur within the oak root zone as defined by the County and are considered impacts to oak woodland.

However, if raptors are observed nesting or displaying breeding/nesting behavior within the area, construction will be postponed until (1) all nesting (or breeding/nesting behavior) has ceased or until after July 15; or (2) a temporary noise barrier or berm will be constructed at the edge of the development footprint to reduce noise levels below 60 dB L_{eq} or ambient (if ambient is greater than 60 dB L_{eq}), to the satisfaction of the Director of PDS with concurrence from USFWS and CDFW. Alternatively, if approved by the Director of PDS with concurrence from USFWS and CDFW, the duration of construction equipment operation could be controlled to keep noise levels below 60 dB L_{eq} or ambient in lieu of or in concert with a wall or other sound attenuation barrier.

3.5 CONCLUSION

Implementation of the proposed Project would directly impact habitat for several County Group 1 species, including raptor habitat and habitat supporting grasshopper sparrow, and also may result in indirect impacts from construction noise. If implemented, the recommended MMs would reduce these impacts to less than significant.

4.0 RIPARIAN HABITAT OR SENSITIVE NATURAL COMMUNITY

4.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the USFWS or CDFW (County 2010b)?

Any of the following conditions would be considered significant if:

- A. Project-related grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5 in the County Guidelines for Determining Significance [County 2010b], excluding those without a mitigation ratio) on or off the Project site.
- B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by the USACE, CDFW, and County: vegetation removal; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; road crossing construction; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity, and abundance.
- C. The Project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.

- D. The Project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive habitats over the long term.
- E. The Project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

4.2 ANALYSIS OF PROJECT EFFECTS

The proposed Project would result in significant impacts under the above guidelines for the following reasons:

- 4.1.A As discussed above, implementation of the proposed Project would result in direct impacts to approximately 64.9 acres of riparian and/or sensitive vegetation communities comprised of: 0.17 acre of southern riparian forest, 0.04 acre of southern willow scrub, 0.01 acre of mule fat scrub, 0.02 acre of herbaceous wetland, 0.08 acre of disturbed wetland, 6.7 acres of coast live oak woodland, 1.0 acre of Diegan coastal sage scrub, 3.1 acres of southern mixed chaparral, and 53.8 acres of non-native grassland. These impacts would be significant according to County Guideline 4.1.A.
- 4.1.B The Project site supports jurisdictional wetlands and riparian habitat. Impacts to jurisdictional waterways include 0.21 acre of WUS (including 0.19 acre of non-wetland WUS), 0.92 acre of CDFW jurisdictional areas (including 0.26 acre of unvegetated streambed), and 0.18 acre of County RPO wetland (Table 7). These impacts would be significant according to County Guideline 4.1.B.

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

- 4.1.C No groundwater withdrawals or activities that could result in lowering of the groundwater table are proposed. Groundwater would continue to be used for orchards remaining on site after Project development but would be substantially less than over the last two decades, as the amount of orchard would be reduced by over 60 percent. Current water use for irrigation of onsite orchard is approximately 468 acre-feet per year. Irrigation of orchard in the post-development condition is estimated to be 148 acre-feet of water per year, resulting in a reduction of approximately 320 acre-feet (over 104 million gallons) of ground water per year. Furthermore, the Project would use recycled water for landscaping irrigation. Under County Guideline 4.1.C, impacts would be less than significant.
- 4.1.D The Project would not result in significant indirect impacts from the spread of non-native plant species during construction, as non-native species are already prevalent throughout the Project site, comprising 50% of the species observed on site. To avoid further impacts from plants installed as part of the Project, only non-invasive plant species would be included in the landscape plan for the site (species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council [Cal-IPC; 2006]). Under County Guideline 4.1.D, impacts would be less than significant occur.

4.1.E The Project provides minimum 50-foot wetland buffers around all preserved wetlands on site. This buffer width is considered appropriate given the small amount of wetlands occurring on site, their scattered distribution, lack of connectivity to large areas of off-site open space, and negative survey findings for listed species. Under County Guideline 4.1.E, impacts would be less than significant.

4.3 CUMULATIVE IMPACT ANALYSIS

The cumulative projects (including the proposed Project) with available data would result in impacts to 7.07 acres of wetland/riparian habitats, 14.9 acres of coast live oak woodland, 96.0 acres of coastal sage scrub, 7.3 acres of southern mixed chaparral, and 218.8 acres of non-native grassland. Cumulative impacts to sensitive habitats would be significant.

The proposed Project's impacts to wetland/riparian habitat and sensitive upland communities, while significant at the project level, are considered cumulatively significant but mitigable as the Project would provide mitigation for these impacts in accordance with County and regulatory agency guidelines. The County approved mitigation ratios are standardized and not dependent upon the quality of habitat. Rather, the mitigation ratios recognize the regional importance of the habitat, the overall rarity of the habitat, and the number and variety of species it supports. Mitigation for habitat loss is required to compensate for direct impacts as well as cumulative loss of habitat. Impacts to wetland/riparian habitat and sensitive upland communities would be fully mitigated at County-approved ratios through off-site preservation and/or purchase of credits at an approved mitigation bank, thus providing long-term conservation value. As the Project would be in conformance with County guidelines and mitigation ratios, the proposed Project's contribution to cumulative impacts to sensitive vegetation communities is not considerable.

4.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impact 4.4.1 Implementation of the proposed Project would result in direct impacts to 64.9 acres of ten sensitive vegetation communities comprised of: 0.17 acre of southern riparian forest, 0.04 acre of southern willow scrub, 0.01 acre of mule fat scrub, 0.02 acre of herbaceous wetland, 0.08 acre of disturbed wetland, 6.7 acres of coast live oak woodland, 1.0 acre of isolated Diegan coastal sage scrub, 3.1 acres of granitic southern mixed chaparral and 53.8 acres of non-native grassland. The Project also would indirectly impact 0.8 acre of Diegan coastal sage scrub.

MM 4.4.1a The Project's effect on 0.17 acre of southern riparian forest will be mitigated at a 3:1 ratio through the purchase of 0.51 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.

MM 4.4.1b The Project's effect on 0.04 acre of southern willow scrub will be mitigated at a 3:1 ratio by the purchase of 0.12 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.

- MM 4.4.1c* The Project's effect on 0.01 acre of mule fat scrub will be mitigated at a 3:1 ratio by the purchase of 0.03 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.
- MM 4.4.1d* The Project's effect on 0.02 acre of herbaceous wetland will be mitigated at a 3:1 ratio by the purchase of 0.06 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.
- MM 4.4.1e* The Project's effect on 0.08 acre of disturbed wetland will be mitigated at a 3:1 ratio by the purchase of 0.24 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.
- MM 4.4.1f* The Project's effect on 6.7 acres of coast live oak woodland and 0.9 acre of oak woodland buffer (consisting of 0.7 acre non-native grassland and 0.2 acre of eucalyptus woodland) will be mitigated at a 2:1 ratio for the 2.4 acres occurring within the Limited Building Zone around biological open space, and at a 3:1 ratio for the remaining 4.3 acres of impact and 0.9 acre of buffer impact. A 2.4-acre Oak Tree Protection Easement would be recorded over the 2.4 acres of coast live oak woodland remaining within the LBZ, which would limit fuel modification to clearing of the understory and prohibit the removal of mature oak trees. Mitigation would be accomplished through the purchase of 20.4 acres of oak woodland, oak riparian woodland, or oak riparian forest credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 9.8 acres of mitigation for oak woodland within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.
- MM 4.4.1g* The Project's direct effect on 1.0 acre of Diegan coastal sage scrub and indirect effect on 0.8 acre of Diegan coastal sage scrub will be mitigated at a 2:1 ratio through the purchase of 3.6 acres of coastal sage scrub credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies; and/or off-site acquisition and preservation of land within the NC MSCP PAMA boundaries containing Diegan coastal sage scrub. The 0.2 acre of mitigation for coastal sage scrub within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.
- MM 4.4.1h* The Project's effect on 3.1 acres of granitic southern mixed chaparral will be mitigated at a 0.5:1 ratio through one or a combination of the following: the purchase of 1.6 acres of chaparral credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies; or off-site acquisition and

preservation of land within the NC MSCP PAMA boundaries containing southern mixed chaparral.

- MM 4.4.1i* The Project's effects on 53.8 acres of non-native grassland will be mitigated at a 1:1 ratio through one or a combination of the following: off-site preservation of 53.1 acres² of grassland habitat and/or other like-functioning habitat within the NC MSCP PAMA boundaries, or purchase of 53.1 acres of grassland credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. Impacts to 20.5 acres of extensive agriculture will be mitigated at the base ratio of 0.5:1, for a mitigation requirement of 10.3 acres through one or a combination of the following: off-site preservation of 10.3 acres of pasture or grassland habitat and/or other like-functioning habitat within the NCMSCP PAMA boundaries, or purchase of 10.3 acres of grassland credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 0.6 acre of mitigation for non-native grassland and 10.3 acres of mitigation for extensive agriculture within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.
- Impact 4.4.2* Implementation of the proposed Project would impact 0.02 acre of herbaceous wetland WUS and 0.19 acre of non-wetland WUS regulated by the USACE.
- MM 4.4.2* Impacts to 0.02 acre of USACE herbaceous wetland will be mitigated at a 3:1 ratio as described in MM 4.4.1d. Impacts to 0.19 acre of non-wetland WUS would be mitigated by the purchase of 0.19 credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies. All mitigation for WUS would occur in consultation with the USACE.
- Impact 4.4.3* Implementation of the proposed Project would impact a total of 0.66 acre of vegetated CDFW jurisdictional areas, comprised of 0.14 acre of southern riparian forest, 0.39 acre of coast live oak woodland, 0.02 acre of southern willow scrub, 0.01 acre of mule fat scrub, 0.02 acre of herbaceous wetland, and 0.08 acre of disturbed wetland. Impacts to unvegetated CDFW habitat (streambed) are discussed below under Impact 4.4.4.
- MM 4.4.3* Impacts to 0.66 acre of vegetated CDFW jurisdictional areas will be mitigated by the implementation of MMs 4.4.1a (southern riparian forest), 4.4.1b (southern willow scrub), 4.4.1c (mule fat scrub), 4.4.1f (coast live oak woodland), 4.4.1d (herbaceous wetland) and 4.4.1e (disturbed wetland). Mitigation for impacts to CDFW streambed is described in MM 4.4.4.

² 53.1 acres of grassland mitigation would be provided for impacts to 53.8 acres of non-native grassland. The remaining 0.7 acre would be mitigated through oak woodland mitigation, as impacts to 0.7 acre of non-native grassland occur within the oak root zone as defined by the County and are considered impacts to oak woodland.

Impact 4.4.4 Implementation of the proposed Project would impact 0.26 acre of CDFW streambed.

MM 4.4.4 Impacts to 0.26 acre of CDFW streambed will be mitigated by the implementation of MM 4.4.2, plus purchase of an additional 0.07 acre of credit at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.

Impact 4.4.5 Implementation of the proposed Project would impact 0.18 acre of County RPO wetlands comprised of 0.17 acre of southern riparian forest and 0.01 acre of mule fat scrub.

MM 4.4.5 Impacts to 0.18 acre of County RPO wetlands will be mitigated by the implementation of MM 4.4.1a and 4.4.1c.

4.5 CONCLUSION

Implementation of the proposed Project would result in significant impacts to sensitive natural communities, including jurisdictional areas; however, a combination of avoidance through project design and mitigation measures for loss of habitat resulting from implementation of the potential Project would reduce impacts to less than significant. Mitigation is proposed at ratios consistent with those required by the County and resource agencies.

5.0 JURISDICTIONAL WETLANDS AND WATERWAYS

5.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

5.1.A Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means (County 2010b)?

5.2 ANALYSIS OF PROJECT EFFECTS

As previously stated in Sections 2.4 and 4.2, implementation of the proposed Project would result in impacts to 0.02 acre of herbaceous wetland WUS and 0.19 acre of non-wetland WUS (Table 7 and Figures 12a and 12b). Impacts to herbaceous wetland WUS are significant under County Guideline 5.1.A.

5.3 CUMULATIVE IMPACT ANALYSIS

The proposed Project's impacts to 0.21 acre of USACE jurisdictional areas comprised of 0.02 acre of herbaceous wetland and 0.19 acre of non-wetland waters, while significant at the project level would be fully mitigated by off-site establishment and rehabilitation of wetlands/WUS. Mitigation would conform to the USACE's no net loss policy, thus no cumulatively significant impact would occur.

5.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impacts to USACE jurisdictional areas will be mitigated by off-site restoration and/or purchase of credits at a mitigation bank.

Impact 5.4.1 Implementation of the proposed Project would impact 0.02 acre of herbaceous wetland WUS.

MM 5.4.1 Impacts to 0.02 acre of herbaceous wetland WUS will be mitigated through implementation of MM 4.4.1d.

5.5 CONCLUSION

Implementation of the proposed Project would result in significant impacts to USACE wetlands; however, the Project would also impact non-wetland WUS and CDFW streambed. MMs, as determined in consultation with the USACE and CDFW, are anticipated.

Impacts to jurisdictional areas would require permitting through the appropriate regulatory agencies, as discussed below. Final mitigation requirements would be determined through agency consultation, and would reduce impacts to less than significant.

5.5.1 U.S. Army Corps of Engineers

The regulatory authority of the USACE comes from Section 404 of the CWA, which requires USACE authorization for work involving intentional or unintentional placement of fill or discharge of dredged materials into any WUS. A federal CWA Section 404 Permit would be required for the proposed Project to place fill in WUS. Impacts to less than 0.5 acre of non-vernal pool WUS are typically processed through a Nationwide Permit.

5.5.2 Regional Water Quality Control Board

A federal CWA Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB) is required for every federal permit action that may result in a discharge into any WUS. This certification must be issued prior to any 404 Permit. The RWQCB reviews the request for certification and may recommend either certification or denial thereof to the State Board Executive Director.

5.5.3 California Department of Fish and Wildlife

The CDFW requires a 1602 SAA for projects that would divert or obstruct the natural flow of water; change the bed, channel, or bank of any stream; remove riparian vegetation; or use any material from a streambed. The SAA is a contract between the applicant and the CDFW stating what can be done in the riparian zone and stream course.

6.0 WILDLIFE MOVEMENT AND NURSERY SITES

6.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (County 2010b)?

Any of the following conditions would be considered significant if:

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

6.2 ANALYSIS OF PROJECT EFFECTS

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

- 6.1.A The Project would impede wildlife access to on-site areas that may be used for foraging, breeding, or obtaining water, however, these areas do not support critical populations of species and the Project would not impede access to areas necessary for their reproduction. As discussed in Section 1.4.8, the Project site is situated at the western edge of existing development with little opportunity for wildlife movement to the east and north. The construction of the Harmony Grove Village development further limits wildlife connectivity to the south of the site. The only open space areas adjacent to the site are two small areas within Harmony Grove Village: (1) a 1.4-acre area of isolated open space along a small portion of the Project site's southern boundary, and (2) a 1.9-acre area of

isolated open space south of Mt. Whitney Road and abutting the Project site's southwestern edge. As such, wildlife movement within and adjacent to the site is primarily associated with connectivity to off-site habitat along the western site boundary from Mt. Whitney Road north, which abuts existing rural residential development interspersed with chaparral-covered hillsides. This off-site habitat is not within a PAMA but does provide habitat for wildlife and connectivity to conserved lands located further to the west, including several canyons that are likely to support areas for wildlife to obtain water, as well as areas suitable for foraging and breeding for deer and other wildlife. The Project would preserve approximately 48.6 acres in the northwest corner of the site as a combination of 12.1 acres of biological open space and 36.5 acres within an agricultural easement, connecting to off-site chaparral along an approximately 2,900-linear foot distance of the western boundary from the site's northwest corner to the edge of the fuel modification zone in Neighborhood 4 (Figure 16a). Biological open space in the northwest corner and other portions of the site would conserve a total of 28.2 acres of habitat, consisting primarily of wetland, riparian, oak woodland, and grassland habitats. Preservation of these habitats will continue to provide foraging and breeding habitat for a variety of species. The Project would not alter existing access from the west to two riparian areas on site, one in preserved lands in the northernmost parcel within southern mixed chaparral and avocado groves, and the other within biological open space in Neighborhood 4. As discussed above, these areas are part of a 48.6-acre block of land that consists of biological open space and an agricultural easement, which connect to off-site native habitat along approximately 2,900 linear feet of the western site boundary. The riparian area and adjacent preserved lands within Neighborhood 4 provide areas suitable for foraging and breeding, as well as providing a water source for wildlife. Project implementation would impede access to biological open space within Neighborhood 3 to the east from open space in Neighborhood 4, mainly for mammal species; however, these areas would continue to provide foraging and breeding habitat for avian species and do not provide areas critical for mammal reproduction. Conserved lands associated with Mt. Whitney/Double Peak are located approximately one mile to the west and portions of the Escondido Creek Resource Conservation Area are further to the southwest. The viability of these off-site conserved lands as habitat and movement corridors for wildlife would not be affected by the Project as they are part of larger, connected open space areas that do not extend across the Project site. Furthermore, the southernmost entrance road into Neighborhood 5 includes a con-span bridge measuring 20 ft wide by 6 ft high with an earthen bottom. This project design feature would allow for local movement of aquatic and terrestrial species between the on-site and off-site open space and is of sufficient size for deer to pass through, thereby reducing the potential for road mortality to wildlife. Project implementation would retain adequate access to areas that may be used for foraging, breeding, and water sources. As such, the Project would have less than significant impacts under County Guideline 6.1.A.

- 6.1.B The Project site does not provide core wildlife habitat or linkage areas. As discussed above, the Project site is situated at the western edge of existing development with limited opportunity for wildlife movement to the east and north of the Project site. The construction of the Harmony Grove Village development further limits wildlife connectivity to the south of the Project site. Thus, the only area of substantial

connectivity allowing local wildlife movement to off-site habitat is to the west of the site. The Project would conserve 48.6 acres of land in the northern portion of the site along approximately 2,900 linear feet of the site's western boundary as a combination of biological open space and agricultural easement, thus continuing to allow for wildlife to access the Project site from the west. However, there is no existing regional corridor that continues across the site from the west to off-site preserved habitat because of existing urban and residential development to the north, east, and south of the Project site. The site does not provide connectivity between large blocks of habitat or interfere with a regional wildlife corridor or linkage, which is supported by the fact that the site is not identified as potential future PAMA in the draft NCMSCP. Conserved lands associated with Mt. Whitney/Double Peak are located approximately one mile to the west and portions of the Escondido Creek Resource Conservation Area are further to the southwest. The viability of these off-site conserved lands as habitat and movement corridors for wildlife would not be affected by the Project as they are part of larger, connected open space areas that do not extend across the Project site. The Project site is used by a variety of wildlife species but does not support core or critical populations of any special status species, nor have any listed species or narrow endemic plant or animal species been observed on site. The Project site contains non-continuous riparian areas interspersed primarily with orchard and non-native grassland and does not provide core wildlife habitat or linkage areas. As such, the Project would have less than significant impacts under County Guideline 6.1.B.

- 6.1.C The Project would not create artificial wildlife corridors. Riparian habitats, which are often associated with local wildlife movement, would be largely conserved in on-site Biological Open Space. However, these areas do not occur as continuous riparian corridors on site, but rather as clusters of riparian habitat interspersed with grassland, orchard, and other upland vegetation communities. Although site development would occur within these connecting upland areas and impede local wildlife movement, no artificial corridors that do not follow natural movement patterns would be created. Under County Guideline 6.1.C, no significant impact would occur.
- 6.1.D As previously discussed in Section 3.2, all proposed Project-related lighting would be required to adhere to Division 9 of the San Diego County Light Pollution Code. Lighting within the proposed Project site adjacent to undeveloped habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from such habitat. Additionally, the site is not part of a regional corridor or linkage, and as such, noise impacts resulting from the Project would not impact any regional corridors and linkages. Under County Guideline 6.1.D, no significant impact to wildlife corridors or linkages resulting from lighting or noise would occur.
- 6.1.E The Project would not reduce an existing wildlife corridor or linkage, or further constrain an already narrow wildlife corridor. As discussed in Section 1.4.8, the Project site is not part of a regional wildlife corridor or linkage. Under County Guideline 6.1.E, no significant impact would occur.

6.1.F The Project would not affect visual continuity within wildlife corridors or linkages, as none exist on or adjacent to the site. Under County Guideline 6.1.F, no significant impact would occur.

6.3 CUMULATIVE IMPACT ANALYSIS

The cumulative projects are located in existing urbanized areas of San Marcos, Escondido, and unincorporated County, or located on the fringes of urbanization (Figure 15). Primary wildlife use areas are located in the Mt. Whitney area and along Escondido Creek. Cumulative effects have occurred between these two use areas. In light of the project's analysis and distance from Escondido Creek, the project's contribution is not considerable. Supporting this conclusion is the fact that the project area is not located within draft PAMA under the draft NCMSCP.

6.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

No significant impacts would occur and no mitigation is required.

6.5 CONCLUSION

No significant impacts would occur and no mitigation is required.

7.0 LOCAL POLICIES, ORDINANCES, AND ADOPTED PLANS

7.1 GUIDELINES FOR THE DETERMINATION OF SIGNIFICANCE

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Would the project conflict with the provisions of an adopted HCP, NCCP plan, or other approved local, regional or state HCP (County 2010b)?

Any of the following conditions would be considered significant if:

- A. For lands outside of the MSCP, the project would impact Diegan coastal sage scrub vegetation in excess of the County's 5 percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- B. The project would preclude or prevent the preparation of the subregional NCCP. For example, the Project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.
- C. The project will impact any amount of wetlands or sensitive habitat lands as outlined in the RPO.
- D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.

- E. The project does not conform to goals and requirements outlined in any applicable HCP, Resource Management Plan (RMP), Special Area Management Plan, Watershed Plan, or similar regional planning effort.
- F. For lands within the MSCP, the project would not minimize impacts to BRCA, as defined in the BMO (County 2010c).
- G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- H. The project does not maintain existing movement corridors and/or habitat linkages, as defined by the BMO.
- I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- J. The project would reduce the likelihood of survival and recovery of listed species in the wild.
- K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).
- L. The project would result in the take of eagles, eagle eggs, or any part of an eagle (Bald and Golden Eagle Protection Act; BGEPA).

7.2 ANALYSIS OF PROJECT EFFECTS

The proposed project would result in significant impacts under the above guidelines for the following reason:

- 7.1.K Implementation of the proposed Project could potentially result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA), as breeding birds may temporarily or permanently leave their territories to avoid construction activities, which could lead to reduced reproductive success and increased mortality. This would be significant according to County Guideline 7.1.K.

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

- 7.1 A The Project site is outside of the MSCP and the Project would directly impact 1.0 of 1.8 acre (56 percent) of the Diegan coastal sage scrub on site. The remaining 0.8 acre is not considered biologically viable due to the small amount of habitat remaining and would therefore be mitigated as well. The loss of 1.8 acres of sage scrub would not be in excess of the County's 5 percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.

- 7.1.B Implementation of the proposed Project would not preclude or prevent the preparation of the subregional NCCP as the Project site occurs within a subregion with an approved NCCP Plan (MSCP) and is not identified as an area critical to future habitat preserves. Under County Guideline 7.1.B, no significant impact would occur.
- 7.1.C The Project would impact 0.18 acre of wetlands as outlined in the RPO, although no sensitive habitat lands as defined by the County's RPO occur on site. Impacts to RPO wetlands would occur in two locations: (1) widening of Mt Whitney Road would impact 0.01 acre of mule fat scrub in Neighborhood 1, and (2) construction of a road crossing would impact 0.17 acre of southern riparian forest in Neighborhood 3. RPO wetland crossing findings are presented in Section 2.4 and the project is consistent with the RPO under County Guideline 7.1.C.
- 7.1.D The Project has minimized impacts to coastal sage scrub to the greatest extent practicable. Very little coastal sage scrub occurs on site (1.8 acres), of which 0.8 acre would not be directly affected by development or fuel modification. However, the Project would mitigate at a 2:1 ratio for the entire 1.8 acres of coastal sage scrub occurring on site (see MM 4.4.1g), thus no significant impact would occur under County Guideline 7.1.D.
- 7.1.E The Project site is within the Draft North County Subarea Plan boundary, but is not within the adopted South County Subarea Plan. Under County Guideline 7.1.E, no significant impact would occur.
- 7.1.F The Project site is not within County's adopted MSCP. Under County Guideline 7.1.F, no significant impact would occur.
- 7.1.G The Project would not preclude connectivity between areas of high habitat values, as lands on and adjacent to the Project site are identified as Developed and Agriculture on the County's Habitat Evaluation Map (2002). As such, no significant impact would occur under County Guideline 7.1.G.
- 7.1.H As discussed in Section 1.4.8, the Project site is not part of a regional wildlife corridor or linkage. The Project site is situated at the western edge of existing development with little opportunity for wildlife movement to the east and north due to urban sprawl within the Cities of San Marcos and Escondido, and further impeded by SR 78 and Mission Road. The construction of the Harmony Grove development further limits wildlife connectivity to the south of the site. Although the Project site is used by a variety of wildlife species it is not considered a regional corridor or linkage as connectivity to the north, south, and east is limited and the site does not provide connection to open space areas in these areas. Wildlife movement within and onto the site is primarily associated with local populations of species from along the western site boundary from Mt. Whitney Road north, which abuts existing rural residential development interspersed with chaparral-covered hillsides. The Project site, as well as off-site areas abutting the western site boundary, are not within a future PAMA and therefore would not be preserved under MSCP planning. Chaparral habitat to the west of the Project site provides connectivity to

PAMA lands further west (Mt. Whitney/Double Peak area), which is the main wildlife corridor in the Project vicinity. The Project would preserve the majority of riparian resources present on site and would preserve approximately 48.6 acres in the northwest corner of the site as a combination of 12.1 acres of biological open space and 36.5 acres within an agricultural easement, connecting to off-site chaparral along an approximately 2,900-linear foot distance (Figure 16a). Although Project implementation would hinder large animal movement (e.g., deer) within the developed portions of the site, there is no existing corridor that continues across the site from the west to off-site preserved habitat in any direction and the Project site does not contain biological resources that are critical for regional movement of wildlife; therefore, no significant impact would occur under County Guideline 7.1.H.

- 7.1.I The Project is not located within the adopted MSCP Subarea Plan. Under County Guideline 7.1.I, no significant impact would occur.
- 7.1.J No listed species would be impacted by Project implementation. Under County Guideline 7.1.J, no significant impact would occur.
- 7.1.L Implementation of the proposed Project would not result in the take of eagles, eagle eggs, or any part of an eagle. Under County Guideline 7.1.L, no significant impact would occur.

7.3 CUMULATIVE IMPACT ANALYSIS

Each of the cumulative projects listed in Table 8 and discussed above would be required to conform to County Guidelines 7.1.A through 7.1.L and provide mitigation as appropriate. In addition, the proposed Project results in less than significant impacts for 10 of the 12 guidelines in Section 7.0. Mitigation is proposed to reduce the Project impacts to RPO wetlands and migratory birds. Conformance or mitigation, as appropriate, would be required for the proposed Project and for the other cumulative projects in order to obtain a recommendation for approval, thus no cumulative impacts would occur.

7.4 MITIGATION MEASURES AND DESIGN CONSIDERATIONS

- Impact 7.4.1* The Project will impact 0.18 acre of wetlands as outlined in the RPO, although no sensitive habitat lands occur on site.
- MM 7.4.1* Implementation of MM 4.4.5 and MM 4.4.1a and 4.4.1d will mitigate for impacts to wetlands considered RPO. In addition, all preserved RPO wetlands are surrounded by a minimum 50-foot buffer, which is included in the biological open space.
- Impact 7.4.2* Breeding migratory birds may temporarily or permanently leave their territories to avoid construction activities, which could lead to reduced reproductive success and increased mortality.

MM 7.4.2 In order to ensure compliance with the MBTA, grading or clearing of vegetation will occur outside of the breeding season of most avian species (February 1 to September 1). Grading or clearing during the breeding season of MBTA-covered species could occur with PDS approval and Wildlife Agency concurrence if it is determined that no nesting birds (or birds displaying breeding or nesting behavior) are present immediately prior to clearing. A pre-construction survey will be conducted within 7 days prior to clearing or grading activities to determine if breeding or nesting avian species occur within impact areas prior to project implementation.

7.5 CONCLUSION

Implementation of the proposed Project would result in potentially significant impacts to wetlands as defined by the RPO, and to breeding migratory birds. Off-site establishment and rehabilitation of wetlands and/or purchase of credits at an approved mitigation bank, as well as avoiding clearing of vegetation during the bird breeding season would reduce these impacts to less than significant.

8.0 SUMMARY OF PROJECT IMPACTS AND MITIGATION

Implementation of the proposed Project would result in significant impacts to special status animal species, natural communities, and local policies.

Implementation of the proposed Project would result in direct impacts to the following special status species: Cooper's hawk, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, turkey vulture, grasshopper sparrow, yellow warbler, western bluebird, and southern mule deer. In addition, Project implementation would impact raptor foraging habitat.

Implementation of the proposed Project would result in impacts to the following sensitive vegetation communities: southern riparian forest, southern riparian woodland, southern willow scrub, herbaceous wetland, mule fat scrub, disturbed wetland, coast live oak woodland, Diegan coastal sage scrub, granitic southern mixed chaparral, and non-native grassland.

Project implementation would result in impacts to USACE wetland WUS.

Mitigation for impacts to sensitive vegetation communities and County Group 1 sensitive animal species (Cooper's hawk, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, turkey vulture, and grasshopper sparrow) would occur through off-site preservation of habitat in areas with long-term conservation value for a variety of species (Table 9), and is proposed to occur through one or more of the following: purchase of credits at the San Luis Rey Mitigation Bank and the future Brook Forest Conservation Bank, or off-site acquisition and preservation of land within the NC MSCP PAMA boundaries, or other location deemed acceptable by the County and Wildlife Agencies. Project impacts to County Group 2 sensitive animal species (yellow warbler, western bluebird, and southern mule deer) are considered less than significant and no mitigation is required.

Impacts to USACE and CDFW jurisdictional areas would be mitigated by purchase of credits at the San Luis Rey Mitigation Bank, or other acceptable location as determined in consultation with these agencies (Table 9). Long-term habitat management would be provided for all off-site preservation areas.

With implementation of the MMs listed in Sections 3.4, 4.4, 5.4, and 7.4 for significant impacts to sensitive biological resources, all Project-specific impacts would be mitigated to less than significant. Table 10 provides a summary of the proposed MMs.

Table 9
IMPACTS AND MITIGATION FOR HABITAT/VEGETATION COMMUNITIES (acre[s])¹

VEGETATION COMMUNITY/HABITAT ²	TIER	ACREAGE			MITIGATION				
		Existing	On-site Impacts	Off-site Impacts	Mitigation Ratio	Required	Preserved On Site ³	Impact Neutral ⁴	Off-site Mitigation
Southern Riparian Forest (61300)	I	2.50	0.17	--	3:1	0.51	2.33	2.33	0.51
Southern Riparian Woodland – including disturbed (62000)	I	0.29	0.00	--	--	--	0.27	0.29	--
Southern Willow Scrub (63320)	I	0.15	0.04	--	3:1	0.12	0.11	0.11	0.12
Mule Fat Scrub (63310)	I	0.02	0.01	--	3:1	0.03	0.01	0.01	0.03
Freshwater Marsh (52400)	I	0.12	0.00	--	3:1	--	0.12	0.12	--
Herbaceous Wetland (52510)	I	0.35	0.02	--	3:1	0.06	0.33	0.33	0.06
Disturbed Wetland (11200)	I	0.13	0.08	--	3:1	0.24	0.05	0.05	0.24
Open Water/Pond (64140)	--	0.51	0.00	--	--	--	0.17	0.51	--
Tamarisk Scrub (63810)	--	0.04	0.04	--	--	--	--	--	--
Coast Live Oak Woodland – including disturbed (71160)	I	11.7	6.7	--	2:1 to 3:1 ⁵	20.4 ⁶	4.2	3.3	20.4
Diegan Coastal Sage Scrub - including disturbed (32500)	II	1.8	1.0	--	2:1	3.6 ⁷	0.7	0.6	3.6
Southern Mixed Chaparral - including disturbed (37121)	III	8.0	3.1	--	0.5:1	1.6	4.8	0.6	1.6
Eucalyptus Forest (79100)	--	7.2	4.6	--	--	--	1.7	--	--

Table 9 (cont.)
IMPACTS AND MITIGATION FOR HABITAT/VEGETATION COMMUNITIES (acre[s])¹

VEGETATION COMMUNITY/HABITAT ²	TIER	ACREAGE			MITIGATION				
		Existing	Impacts	Off-site Impacts	Mitigation Ratio	Required	Preserved On Site ³	Impact Neutral ⁴	Off-site Mitigation
Eucalyptus Woodland (79100)	IV	3.5	1.4	--	--	--	2.1	--	--
Non-native Grassland (42200)	III	63.9	53.8	--	1:1 ⁸	53.1 ⁸	6.5	3.4	53.1
Non-native Vegetation (11000)	--	1.5	1.0	--	--	--	0.3	--	--
Orchard (18100)	IV	100.2	60.6	--	--	--	3.9 ⁹	--	--
Intensive Agriculture (18200)	IV	8.8	6.9	--	--	--	0.1	--	--
Extensive Agriculture (18300)	IV	21.3	20.5	--	0.5:1 ¹⁰	10.3	0.3	--	10.3
Disturbed Habitat (11300)	IV	2.4	2.1	0.1	--	--	0.2	--	--
Developed Land (12000)	IV	4.1	2.9	1.4	--	--	--	--	--
TOTAL		238.8	164.9	1.5	--	90.0	28.2	11.7	90.0

¹Upland habitats are rounded to the nearest 0.1 acre and wetland habitats are rounded to the nearest 0.01, thus totals reflect rounding.

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

³In Biological Open Space (BOS).

⁴Includes all preserved RPO wetlands and their buffers, as well as RPO wetlands occurring within the SDG&E easement (which are not impacted by the project but, per County direction, cannot be placed into an open space easement).

⁵Mitigation provided at a 2:1 ratio for 2.4 acres of woodland to be placed within the Oak Tree Protection Easement in the LBZ and at a 3:1 ratio for 4.3 acres of direct development and fuel modification impacts.

⁶Includes 2.7 acres of mitigation for impacts to 0.9 acre of oak woodland buffer, per County requirements (comprised of 0.7 acre of non-native grassland and 0.2 acre of eucalyptus woodland).

⁷Per direction from USFWS, all coastal sage scrub occurring on site is considered impacted and mitigation is required at 2:1.

⁸A total of 0.7 acre of grassland impacts occur within the oak woodland buffer zone and would be mitigated at 3:1 for impacts to oak woodland; thus the 53.1 acres of grassland mitigation instead of 53.8 acres. See footnote 6, above.

⁹An additional 36.5 acres of orchard adjacent to biological open space will be preserved in the northwest corner under an agricultural easement.

¹⁰County guidelines require mitigation at 0.5:1 for impacts to extensive agriculture consisting of field/pasture lands.

Table 10
SUMMARY OF MITIGATION MEASURES

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)†
<p><i>MM 3.4.1</i> Mitigation for impacts to non-native grassland (typically a 0.5:1 ratio) must include impacts to sensitive species (grasshopper sparrow and raptors) which increases the mitigation ratio to 1:1, for a mitigation requirement of 53.1 acres³. Mitigation for impacts to extensive agriculture, which provides more limited habitat value to species, will occur at the base ratio of 0.5:1, for a mitigation requirement of 10.3 acres. Mitigation for impacts to raptor foraging habitat and grasshopper sparrow habitat would occur through one or a combination of the following: off-site preservation of grassland habitat and/or other like-functioning habitat within the NC MSCP PAMA boundaries, or purchase of grassland credits or like-functioning habitat at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 0.6 acre of mitigation for non-native grassland and 10.3 acres of mitigation for extensive agriculture within the Elfin Forest Harmony Grove Community Plan shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.</p>	<p>Less than significant</p>	<p>3.1.B 3.1.F</p>

³ 53.1 acres of grassland mitigation would be provided for impacts to 53.8 acres of non-native grassland. The remaining 0.7 acre would be mitigated through oak woodland mitigation, as impacts to 0.7 acre of non-native grassland occur within the oak root zone as defined by the County and are considered impacts to oak woodland.

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<p><i>MM 3.4.2</i> No grubbing, clearing, or grading within 300 feet of an active raptor nest during the raptor-breeding season (February 1 to July 15) will occur. As such, all grading permits, improvement plans, and the final map will state the same. If grubbing, clearing, or grading would occur during the raptor-breeding season, a pre-grading survey will be conducted within 3 days prior to grading to determine if raptors occur within the areas directly impacted by grading or indirectly impacted by noise. If there are no raptors nesting (includes nest building or other breeding/nesting behavior) within this area, development will be allowed to proceed. However, if raptors are observed nesting or displaying breeding/nesting behavior within the area, construction will be postponed until (1) all nesting (or breeding/nesting behavior) has ceased or until after July 15; or (2) a temporary noise barrier or berm will be constructed at the edge of the development footprint to reduce noise levels below 60 dB L_{eq} or ambient (if ambient is greater than 60 dB L_{eq}). Alternatively, the duration of construction equipment operation could be controlled to keep noise levels below 60 dB L_{eq} or ambient in lieu of or in concert with a wall or other sound attenuation barrier.</p>	Less than significant	3.1.L 7.1.K
<p><i>MM 4.4.1a</i> Mitigation for impacts to 0.17 acre of southern riparian forest will be mitigated at a 3:1 ratio through the purchase of 0.51 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies. Mitigation shall include a minimum of 1:1 creation/establishment, with the remainder comprised of restoration or enhancement.</p>	Less than significant	4.1.A

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<p><i>MM 4.4.1b</i> Mitigation for impacts to 0.04 acre of southern willow scrub will be mitigated at a 3:1 ratio by the purchase of 0.12 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.. Mitigation shall include a minimum of 1:1 creation/establishment, with the remainder comprised of restoration or enhancement.</p>	Less than significant	4.1.A
<p><i>MM 4.4.1c</i> Mitigation for impacts to 0.01 acre of mule fat scrub will be mitigated at a 3:1 ratio by the purchase of 0.03 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies. Mitigation shall include a minimum of 1:1 creation/establishment, with the remainder comprised of restoration or enhancement.</p>	Less than significant	4.1.A
<p><i>MM 4.4.1d</i> Mitigation for impacts to 0.02 acre of herbaceous wetland will be mitigated at a 3:1 ratio the purchase of 0.06 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies. Mitigation shall include a minimum of 1:1 creation/establishment, with the remainder comprised of restoration or enhancement.</p>	Less than significant	4.1.A
<p><i>MM 4.4.1e</i> Mitigation for impacts to 0.08 acre of disturbed wetland will be mitigated at a 3:1 ratio by the purchase of 0.24 acre of wetland credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies. Mitigation shall include a minimum of 1:1 creation/establishment, with the remainder comprised of restoration or enhancement.</p>	Less than significant	4.1.A

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<p><i>MM 4.4.1f</i> Mitigation for impacts to 6.7 acres of coast live oak woodland and 0.9 acre of oak woodland buffer (consisting of 0.7 acre non-native grassland and 0.2 acre of eucalyptus woodland) will be mitigated at a 2:1 ratio for the 2.4 acres occurring within the Limited Building Zone around biological open space, and at a 3:1 ratio for the remaining 4.3 acres of impact and 0.9 acre of buffer impact. A 2.4-acre Oak Tree Protection Easement would be recorded over the 2.4 acres of coast live oak woodland remaining within the LBZ, which would limit fuel modification to clearing of the understory and prohibit the removal of mature oak trees. Mitigation would be accomplished through the purchase of 20.4 acres of oak woodland, oak riparian woodland, or oak riparian forest credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 9.8 acres of mitigation for oak woodland within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.</p>	Less than significant	4.1.A
<p><i>MM 4.4.1g</i> Mitigation for direct impacts to 1.0 acre of Diegan coastal sage scrub and indirect impacts to 0.8 acre of Diegan coastal sage scrub will be mitigated at a 2:1 ratio through purchase of 3.6 acres of coastal sage scrub credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies; and/or off-site acquisition and preservation of land within the NC MSCP PAMA boundaries containing Diegan coastal sage scrub. The 0.2 of mitigation for coastal sage scrub within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.</p>	Less than significant	4.1.A

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<p><i>MM 4.4.1h</i> Mitigation for impacts to 3.1 acres of granitic southern mixed chaparral will be mitigated at a 0.5:1 ratio through one or a combination of the following: the purchase of 1.6 acres of chaparral credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies; or off-site acquisition and preservation of land within the NC MSCP PAMA boundaries containing southern mixed chaparral.</p>	Less than significant	4.1.A
<p><i>MM 4.4.1i</i> Mitigation for impacts to 53.8 acres of non-native grassland will occur at a 1:1 ratio through one or a combination of the following: off-site preservation of 53.1 acres⁴ of grassland habitat and/or other like-functioning habitat within the NC MSCP PAMA boundaries, or purchase of 53.1 acres of grassland credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. Impacts to 20.5 acres of extensive agriculture will be mitigated at the base ratio of 0.5:1, for a mitigation requirement of 10.3 acres through one or a combination of the following: off-site preservation of 10.3 acres of pasture or grassland habitat and/or other like-functioning habitat within the NCMSCP PAMA boundaries, or purchase of 10.3 acres of grassland credits at an approved mitigation bank such as the future Brook Forest Conservation Bank or other location deemed acceptable by the County and Wildlife Agencies. The 0.6 acre of mitigation for non-native grassland and 10.3 acres of mitigation for extensive agriculture within the EFHGCP shall demonstrate conformance with the EFHGCP to the satisfaction of the Director of PDS.</p>	Less than significant	4.1.A

⁴ 53.1 acres of grassland mitigation would be provided for impacts to 53.8 acres of non-native grassland. The remaining 0.7 acre would be mitigated through oak woodland mitigation, as impacts to 0.7 acre of non-native grassland occur within the oak root zone as defined by the County and are considered impacts to oak woodland. See MM 4.4.1f.

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<p><i>MM 4.4.2</i> Impacts to USACE jurisdictional areas would require regulatory approval by the USACE and RWQCB. These approvals consist of a CWA Section 404 Nationwide Permit from USACE and CWA Section 401 Water Quality Certification from RWQCB. Impacts to 0.02 acre of USACE herbaceous wetland will be mitigated at a 3:1 ratio as described in MM 4.4.1d. Impacts to 0.19 acre of non-wetland WUS will be mitigated by purchase of 0.19 credits at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.</p> <p>All mitigation for WUS would occur in consultation with the USACE.</p>	Less than significant	4.1.B
<p><i>MM 4.4.3</i> Impacts to CDFW jurisdictional areas would require regulatory approval by the CDFW. This approval consists of a SAA from CDFW pursuant to Section 1600 of the California Fish and Game Code. Impacts to 0.66 acre of vegetated CDFW jurisdictional areas will be mitigated by the implementation of MMs 4.4.1a (southern riparian forest), 4.4.1b (southern willow scrub), 4.4.1c (mule fat scrub), 4.4.1f (coast live oak woodland), 4.4.1d (herbaceous wetland) and 4.4.1e (disturbed wetland). Mitigation for impacts to CDFW streambed is described in MM 4.4.4.</p>	Less than significant	4.1.B
<p><i>MM 4.4.4</i> Impacts to 0.26 acre of CDFW streambed will be mitigated by the implementation of MM 4.4.2, plus purchase of an additional 0.07 acre of credit at the San Luis Rey Mitigation Bank, or other location deemed acceptable by the County and Regulatory Agencies.</p>	Less than significant	4.1.B
<p><i>MM 4.4.5</i> Mitigation for impacts to 0.18 acre of County RPO wetlands will be provided by the implementation of MMs 4.4.1a and 4.4.1c.</p>	Less than significant	4.1.B
<p><i>MM 5.4.1</i> Mitigation for impacts to 0.02 acre of herbaceous wetland WUS will be provided through implementation of MM 4.4.1d.</p>	Less than significant	5.1.A

**Table 10 (cont.)
SUMMARY OF MITIGATION MEASURES**

PROPOSED MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION	GUIDELINE NUMBER(S)
<i>MM 7.4.1</i> Mitigation for impacts to 0.18 acre of RPO wetland will be provided through implementation of MMs 4.4.1a and 4.4.1c.	Less than significant	7.1.C
<i>MM 7.4.2</i> In order to ensure compliance with the MBTA, grading or clearing of vegetation will occur outside of the breeding season of most avian species (February 1 to September 1). Grading or clearing during the breeding season of MBTA-covered species could occur with PDS approval and Wildlife Agency concurrence if it is determined that no nesting birds (or birds displaying breeding or nesting behavior) are present immediately prior to clearing. A pre-construction survey will be conducted within 7 days prior to clearing or grading activities to determine if breeding or nesting avian species occur within impact areas prior to project implementation.	Less than significant	7.1.K

†Corresponding to County Guideline numbering as listed in this report.

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