Underground Utility Districts Project UU906 Block 3CC1 [Kensington], San Diego, California

Biological Technical Report

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1 SUMMARY

The City of San Diego Public Works Department proposes to prioritize and develop seven (7) underground utility districts which would allow San Diego Gas & Electric (SDG&E) to construct an Underground Utility System per the franchise agreement. The districts would also create an overlay that would restrict utility companies from installing above-ground utility lines in the future, excluding electric transmission lines which are regulated by the California Public Utilities Commission (CPUC). No permanent impacts to sensitive vegetation communities are anticipated as a result of this project. Temporary impacts resulting from pole removal and trimming (not removal) of vegetation is anticipated. Project activities are estimated to temporarily impact approximately 0.739 acre of Tier IV habitat. A total of 0.106 acre of Tier I, II and Tier IIIA habitats are anticipated to be temporarily impacted. Impacts to sensitive habitats are temporary and will not adversely affect the habitat and are not considered significant; no mitigation will be required. Permanent impacts to sensitive plant species is not anticipated. The following plant species have a moderate/high potential for occurrence onsite or were present onsite: California adolphia, singlewhorl burrobrush, wart-stemmed ceanothus, long-spined spineflower, summer holly, variegated dudleya, San Diego barrel cactus and Nuttall's scrub oak. Impacts to these species are not anticipated as no permanent impacts to habitat will occur. Trimming of perennial shrub species may be required for access but no plant removal is anticipated. Variegated dudleya will be avoided by altering access routes or construction methods. In addition, permanent impacts to these species will be avoided with adherence to Avoidance and Minimization Measures that will be incorporated into the project. Permanent impacts to sensitive wildlife species is not anticipated. The following wildlife species have a moderate/high potential for occurrence on-site or were observed onsite: coastal cactus wren, and Cooper's hawk. Construction is limited to outside of the nesting season for Cooper's hawk and coastal cactus wren (January 15- September 15) and habitat for these species will not be permanently impacted; therefore, impacts to these species is not anticipated. No mitigation for sensitive plant or wildlife species is required.

2 INTRODUCTION

2.1 PROJECT DESCRIPTION

The project would consist of trenching approximately 6 feet deep and 2.5 feet wide along one side of each public right-of-way, installing conduit and substructures such as transformers on concrete pads, installing cable through the conduits, providing individual customer connections, backfilling, removing existing overhead utility lines and poles, and installing new streetlights where applicable. Work would include pole installation or reinstallation where necessary, trenching (18-inches deep) of conduit from electrical service points to the street light locations and installation of pull-boxes when required, and other necessary appurtenances. Utility poles may need to be installed or upgraded at the boundary of the district where determined necessary for the transition from the existing aerial system to the new underground system. Locations will be determined during final design. Curb ramps would be installed where missing to meet the Americans with Disabilities Act (ADA) requirements, which may result in the loss of a street parking space at some locations. In addition, sidewalk repairs, preservation of historical stamps, and street resurfacing or replacement of segments of concrete road will be done as needed. Traffic control measures and Best Management Practices (BMPs) would be implemented during construction. Any street tree removal, relocation, and/or trimming would be done under the supervision of the City Arborist. The street light locations are within urban developed areas, no sensitive vegetation would be affected or removed, and

historic sidewalk stamps would be preserved per contract specifications.

2.2 PROJECT LOCATION

The majority of the Project site is located within the residential areas within the neighborhood of Kensington in the City of San Diego. The project ranges from west to east from Terrace to East Adler and north to south from East Canterbury to Adams. Kensington Hillside Open Space is located north and southeast of the project and is operated by the City of San Diego's Parks and Recreation Department. Several pole locations analyzed are within the MHPA.

2.3 REGULATORY CONTEXT

The Project would be subject to all City of San Diego biological regulations, as outlined herein, as well as relevant state and federal regulations. A full description of state and federal regulations is included as Appendix D to this report. Note however, that compliance with the City's MSCP plan and implementing regulations (e.g., Biology Guidelines, MSCP Subarea Plan, etc.), would result in conformance with the state and federal endangered species acts for species deemed 'covered' under those plans. If any uncovered species occurred on-site, consultation and permitting through state and federal agencies would still be required. Conformance with all other regulations, such as jurisdictional non-wetland waters regulations, would be required and is separate from the City's permitting process. Conformance with all regulations, state, local and federal, is the responsibility of the Project applicant.

3 METHODS

Google Earth imagery and ArcMap software was used to determine which project features had potential for construction activities to impact sensitive resources. SDG&E provided shapefiles of the potential project features. Project features were artificially numbered so that specific features could be distinguished from each other, as needed. Project feature numbers (feature #) can be found in Appendix A on the project maps. Project features determined to be completely within urban environments consisting of ornamental/developed areas were not included in the biological assessment but are mapped in Appendix A.

This biological assessment was comprised of the following activities:

- Desktop analysis of existing biological resources
- Desktop vegetation mapping
- Field analysis of vegetation mapping
- Analysis of potential Project impacts on biological resources
- Analysis of Project conformance with local, state, and federal biological regulations

Desktop analysis of the project area was accomplished by completing a 3 mile buffer search of the California Department of Fish and Wildlife's California Natural Diversity Database (CDFG, 2008, 2016 a-c), San Diego Museum of Natural History rare plant inventory (CNPS, 2018), the United States Fish and Wildlife Service's National Wetland Inventory wetland mapper (USFWS, 2018), USFWS's Critical Habitat Portal (2016) and ArcMap to determine presence of biologically sensitive resources that could potentially be impacted by construction.

Vegetation community classifications follow City of San Diego Biology Guidelines (2012) with nomenclature from Holland (1986) as modified by Oberbauer et al (2008). Vegetation mapping of the Survey Area was restricted to 20 feet from centerline for poles and access footpaths. All trench locations were determined to be completely within urban environments and were not assessed. In addition, several poles

were also determined to be completely within urban environments and were not assessed. Impact areas were restricted to the following project feature buffers: poles (10 foot radius from pole location) and access footpaths (1.5 feet from centerline).

A site visit was conducted February 25, 2019 and March 15, 2019 (Table 1). During the field visit plant and animal observations were recorded. Plant names follow Simpson and Rebman (2014), and animal names follow Laudenslayer (1991). Representative photos of the vegetation communities observed can be found in Appendix C.

Table 1: Survey

Survey Type	Biologist	Date	Time	Weather Conditions
General Biological Survey	Maya Mazon and Rebecca Alvidrez	February 25, 2019	9:00am – 3:00pm	74F, 1-4mph, 0% cloud cover, no precipitation
General Biological Survey	Maya Mazon	March 15, 2019	11:00am – 1:00pm	73F, 1-4mph, 0% cloud cover, no precipitation

4 SURVEY RESULTS

4.1 EXISTING CONDITIONS

Areas immediately north, east and south of the Project are undeveloped open space park and immediately west are developed residential units. Two drainage features are located north and southeast of the project site; however, both features are more than 100 feet from the Project boundary. The Project is surrounded by the City's Multi-Habitat Planning Area (MHPA) on the north, east, south and a small section on the west side. A total of 52 poles were assessed as they were determined to be within potential sensitive habitat. Twelve poles are located partially or completely within the MHPA. Ten access paths are located partially or completely within the MHPA. Fifty-one poles are within private lands and one pole is located within the Kensington Hillside Open Space that is within the MHPA.

4.2 BIOLOGICAL RESOURCES

4.2.1 Botanical Resources

Vegetation communities and land uses within the Project are discussed in the paragraphs below; classifications follow the City of San Diego Biology Guidelines (Guidelines Table 3). Note that 'Tiers' cited within each upland habitat/land use description are from the Biology Guidelines and represent the sensitivity of the habitat, with Tier I as high sensitivity and Tier IV being low/no sensitivity. Table 1 shows a breakdown of the vegetation communities within the Survey Area.

4.2.1.1 Vegetation Communities

4.2.1.1.1 Bare Ground

Bare Ground (Tier IV, other uplands) are areas that have been routinely disturbed by vegetation clearing, trampling and/or compaction. Bare ground is often devoid of vegetation or may have a low percent cover of native or non-native cover. Within the Project footprint these areas occur around the base of poles where regular clearing occurs, and areas trampled by pedestrian access.

4.2.1.1.2 Ornamental Vegetation/Developed Landscape

Ornamental Vegetation and Developed Landscape (Tier IV, other uplands) are areas that have been developed by building or the addition of pavement to create a non-permeable surface and/or area that have been cleared of native vegetation for the addition of ornamental vegetation which is regularly maintained. Within the Project footprint these areas are houses, driveways, roads, backyard patios and associated landscaping. Representative plants observed within this vegetation type are: avocado (*Persea americana*), Peruvian pepper tree (*Schinus molle*), sacred bamboo (*Nandina domestica*), jacaranda (*Jacaranda mimosifolia*), Indian fig (*Opuntia ficus-indica*), jade plant (*Crassula argentea*), gum tree (*Eucalyptus sp.*), tree of heaven (*Ailanthus altissima*), tree of heaven (*Ailanthus altissima*), jacaranda (*Jacaranda mimosifolia*), century plant (*Agave americana*), lily-of-the-Nile (*Agapanthus praecox*) and Spanish dagger (*Yucca gloriosa*).

4.2.1.1.3 Non Native Vegetation

Non Native Vegetation (Tier IV, other uplands) are areas that once were occupied by native vegetation but due to constant disturbance are now dominated by non native species. Within the Project footprint these areas are adjacent to ornamental/developed areas or are areas within the canyon that have been historically disturbed. Representative plants observed within this vegetation type are: iceplant (*Carpobrotus sp.*), black mustard (*Brassica nigra*), ripgut grass (*Bromus diandrus*), California wood-sorrel (*Oxalis albicans*) and red brome (*Bromus madritensis subsp. rubens*).

4.2.1.1.4 Non Native Woodland

Non Native Woodland (Tier IV, other uplands) are areas that once were dominated by native species but due to constant disturbance and/or planting are now dominated by non native tree species. Within the Project footprint these areas are adjacent to ornamental/developed areas or are areas within the canyon that have been historically disturbed. Representative plants observed within this vegetation type are: gum tree (*Eucalyptus sp.*), tree of heaven, and jacaranda.

4.2.1.1.5 Chaparral

Chaparral (Tier IIIA, common uplands) are areas with broad-leaved sclerphyllous shrubs approximately 5-10 feet in height. Vegetative cover can be dense or with occasional patches of bare soil. This vegetation community is often found on steep slopes. Within the Project footprint these areas are limited to north and east-facing hillsides. Representative plants observed within this vegetation type are: laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), poison oak (*Toxicodendron diversilobum*), San Diego barrel cactus (*Ferocactus viridescens*), coastal prickly pear (*Opuntia littoralis*), southern honeysuckle (*Lonicera subspicata*), wild cucumber (*Marah macrocarpa*), mission manzanita (*Xylococcus bicolor*), petty spurge (*Euphorbia peplus*), Nuttall's scrub oak (*Quercus dumosa*), black sage (*Salvia mellifera*), California wood-sorrel (*Oxalis albicans*), orange bush monkey-flower (*Mimulus aurantiacus*), toyon (*Heteromeles arbutifolia*), and chaparral nightshade (*Solanum xanti*).

4.2.1.1.6 Disturbed Chaparral

Disturbed Chaparral (Tier IIIA, common uplands) are areas similar to Chaparral; however, native cover has been greatly decreased due to disturbance to less than 35% of the total vegetative cover. Canopy complexity

is also decreased as the landscape is dominated by herbaceous non-native species. Within the Project footprint these areas buffer between the Chaparral and Ornamental Vegetation/Developed Landscape. Succulent species occasionally create dense stands but are not pervasive or consistent across the area to be described as Maritime Succulent Scrub. Representative plants observed within this vegetation type are: laurel sumac, lemonadeberry, San Diego County viguiera (*Bahiopsis laciniata*), coastal prickly pear, yellow mustard, coast cholla (*Cylindropuntia prolifera*), California wood-sorrel, toyon, and chaparral nightshade.

4.2.1.1.7 Scrub Oak Chaparral

Scrub Oak Chaparral (Tier I, rare uplands) is a dense evergreen vegetation community that can grow to be 20 feet tall. Typically dominated by Nuttall's scrub oak in conjunction with Inland scrub oak (*Quercus berberidifolia*), which may compose more than 50% of the vegetative cover, this vegetation community commonly is found as patches within other vegetation communities. Within the Project footprint these areas are patches within Chaparral. Representative plants observed within this vegetation type are: Nuttall's scrub oak, Inland scrub oak, and lemonadeberry.

Table 1. Vegetation Communities within Survey Area

Vegetation Community	Tier	Acreage
Scrub Oak Chaparral	I	0.011
Chaparral	IIIA	0.348
Disturbed Chaparral	IIIA	0.472
Non Native Vegetation	IV	0.554
Non Native Woodland	IV	0.481
Ornamental	IV	3.680
Bareground	IV	0.029
Total		5.576

4.2.2 Wildlife Resources

Animal species noted within the survey area were primarily common species typical of an urbanized canyon including northern mockingbird (*Mimus polyglottos*), western scrub jay (*Aphelocoma californica*), Say's phoebe (*Sayornis saya*), house finch (*Carpodacus mexicanus*), lesser goldfinch (*Spinus psaltria*), Cooper's hawk (*Accipiter copperii*), red-shouldered hawk (*Buteo lineatus*), Anna's hummingbird (*Calypte anna*), Nuttall's woodpecker (*Picoides nuttallii*), and western fence lizard (*Sceloporus occidentalis*).

4.2.3 Rare, Threatened, Endangered, Endemic and/or Sensitive Species, MSCP-Covered Species

Sensitive plants and animals are defined here as rare and/or endangered, or depleted or declining according to the USFWS, CDFW, California Native Plant Society (CNPS) and/or the City of San Diego. Each species was assessed for its potential to occur within the Survey area (Appendix B). Only species observed during the

field visit or those with a moderate/high potential to occur in the project footprint are described in detail below.

4.2.3.1 Plant Species

Eight plant species are present or have a moderate/high potential to occur within or immediately adjacent to the Project area. A table documenting all species assessed can be found in Appendix B. A short summary outlining the plant species that are present or have a moderate/high potential to occur are described below.

4.2.3.1.1 San Diego barrel cactus

Coast barrel cactus (*Ferocactus viridescens*) is a California Rare Plant Rank (CRPR) 2B.1 species, which means it is considered "seriously threatened in California but more common elsewhere", and is an MSCP-covered species. It is a stem succulent in the Cactaceae family that typically blooms from May to June. This species typically is found on dry west- and south-facing slopes in chaparral, coastal sage scrub, grassland, and adjacent to vernal pools. Coast barrel cactus is known from Riverside and San Diego counties as well as from Baja California, Mexico, at elevations between 10 and 1,480 feet above mean sea level (amsl). This species is threatened by development, non-native plant species, trampling by foot traffic, road maintenance, agricultural practices, grazing, vehicle activity, and illegal dumping (CNPS 2014). Several individuals were observed outside of the footpath to Location 11 during field surveys but may be present within or around other pole locations.

4.2.3.1.2 Nuttall's scrub oak

Nuttall's scrub oak (*Quercus nuttallii*) is a CRPR 1B.1 species, which means it is "seriously threatened in California and elsewhere." (CNPS 2014). It is an evergreen shrub in the Fagaceae family that typically blooms from February to April. This species is found in sandy or clay loam soils in chaparral, coastal sage scrub, and closed-cone coniferous forest. Nuttall's scrub oak is known from southern California from Orange, Santa Barbara, San Diego, and Ventura counties as well as from Baja California, Mexico, at elevations between 45 and 1,315 feet amsl. This species is threatened by development, fire suppression, and vegetation/fuels management (CNPS 2014). Several individuals were observed within the 10-foot work area and footpath of Location 11. This species may be present within or around other pole locations.

4.2.3.1.3 California Adolphia

California adolphia (*Adolphia californica*) is a CRPR 2B.1 species, which means it is "rare or endangered in California, common elsewhere" (CNPS 2014). It is an perennial deciduous shrub in the Rhamnaceae family that typically blooms from December to May. This species is typically found in clay soils in chaparral, coastal sage scrub, and valley and foothill grassland. California adolphia is known from San Diego, Arizona and Baja California, Mexico, at elevations between 32 feet and 2,427 feet amsl. This species is threatened by development, urbanization, road construction, non-native plants and grazing (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.1.4 Singlewhorl burrobush

Singlewhorl burrobush (*Ambrosia monogyra*) is a CRPR 2B.2 species, which means it is "rare or endangered in California, common elsewhere" (CNPS 2014). It is an perennial shrub in the Asteraceae family that typically blooms from August to November. This species is typically found in sandy soils in chaparral, and Sonoran desert scrub. Singlewhorl burrobush is known in Southern California from San Diego, Riverside and San Bernardino counties and from Arizona, New Mexico, Nevada, Sonora, Texas and Baja California, Mexico, at elevations between 32 feet and 1,640 feet amsl. This species is threatened by trail maintenance, and non-native plants (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.1.5 Wart-Stemmed Ceanothus

Wart-stemmed ceanothus (*Ceanothus verrucosus*) is a CRPR 2B.2 species, which means it is "rare or endangered in California, common elsewhere" (CNPS 2014). It is an perennial evergreen shrub in the Rhamnaceae family that typically blooms from December to May. This species is typically found in chaparral. Wart-stemmed ceanothus is known in Southern California from San Diego, and Riverside counties and Baja California, Mexico, at elevations between 3 feet and 1,246 feet amsl. This species is threatened by development (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.1.6 Long-spined spineflower

Long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*) is a CRPR 1B.2 species, which means it is "rare or endangered in California and elsewhere" (CNPS 2014). It is an annual herb in the Polygonaceae family that typically blooms from April to July. This species is often found in clay soils within chaparral, coastal scrub, meadows and seeps, valley and foothill grassland and vernal pools. Long-spined spineflower is known in Southern California from San Diego, Orange, and Riverside counties and Santa Barbara county, and Baja California, Mexico, at elevations between 98 feet and 5,019 feet amsl. This species is threatened by development, non-native grasses, recreational activities, and possibly vehicles and grazing (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.1.7 Summer Holly

Summer holly (*Comarostaphylis diversifolia ssp. diversifolia*) is a CRPR 1B.2 species, which means it is "rare or endangered in California and elsewhere" (CNPS 2014). It is an perennial evergreen shrub in the Ericaceae family that typically blooms from April to June. This species is often found in chaparral, and cismontane woodland. Summer holly is known in Southern California from San Diego, Orange, and Riverside counties and also in Santa Barbara county, and Baja California, Mexico, at elevations between 98 feet and 2,591 feet amsl. This species is threatened by development, urbanization and gravel mining (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.1.8 Variegated Dudleya

Variegated dudleya (*Dudleya variegata*) is a CRPR 1B.2, MSCP-covered and narrow endemic species, which means it is "rare or endangered in California and elsewhere" (CNPS 2014). It is an perennial herb in the Crassulaceae family that typically blooms from April to June. This species is often found in clay soils and within chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pools. Variegated dudleya is known in from San Diego county, and Baja California, Mexico, at elevations between 9 feet and 1,902 feet amsl. This species is threatened by development, grazing and possibly non-native plants (CNPS 2014). This species was not observed on site but has a moderate potential to occur due to proximity of recent historical observations and presence of appropriate vegetation communities and conditions.

4.2.3.2 Wildlife Species

Two wildlife species are present or have a moderate/high potential to occur within or immediately adjacent to the Project area. A table documenting all species assessed can be found in Appendix B. A short summary outlining the wildlife species that are present or have a moderate/high potential to occur are described below.

4.2.3.2.1 Cooper's hawk

Cooper's hawk (*Accipiter cooperi*) is an MSCP-covered species and a CDFW Watchlist species. Cooper's hawks are medium-sized hawks with a rounded tail, broad shoulders and a large head. Adult individuals have

distinct thick dark bands on the tail and are steely grey above with reddish mottled bars along the chest. Cooper's hawks have distinct flight patterns with typically more gliding than other local hawk species. They prefer open spaces but are frequently found in Eucalyptus trees and near bird feeders where they prey on smaller backyard birds. One individual was observed in an ornamental pine tree near Location 11 and was later observed foraging in the area.

4.2.3.2.2 Coastal Cactus Wren

Coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) is an MSCP-covered species and a Species of Special Concern. Coastal cactus wrens area large wren with distinctive heavy spotting which clusters on the upper chest in adult birds. This species also distinctive spots on the outer tail feathers. They prefer to nest in dense stands of cholla and prickly pear. Its range is restricted to patchy areas within coastal San Diego county and limited areas within Orange County. No individuals were observed onsite but potential habitat is present.

5 MSCP CONSISTENCY ANALYSIS

The Project lies within the City's MSCP Subarea and approximately twelve existing pole structures are subject to removal activities occur partially or completely within lands designated as MHPA under the MSCP (Appendix A), therefore compliance with several MSCP Subarea Plan directives is required for the portion of the Project in addition to compliance with the City's other MSCP implementing regulations. The majority of the Project is not within the MHPA but will also be subject to land use adjacency guidelines.

5.1 MHPA COMPATIBLE LAND USES

The twelve existing pole structures subject to removal activities are located partially or completely within lands designated as MHPA under the City's MSCP. The MSCP Subarea Plan (§1.4.1) precludes development within the MHPA except in limited circumstances that are considered "conditionally compatible with the biological objectives of the MSCP." The allowed uses are as follows:

- Passive recreation
- Utility lines and roads in compliance with policies 1.4.2 below
- Limited water facilities and other essential public facilities
- Limited low density residential uses
- Brush Management (Zone 2)
- Limited agriculture

Installation of underground utilities and removal of existing structures qualify as "utility lines" and are conditionally compatible allowed uses within the MHPA, when design and construction are performed in conformance with relevant planning and design guidelines as outlined below.

5.1.1 General Planning and Design Guidelines (§1.4.2)

Following are the Project-relevant requirements from the 'Roads and Utilities – Construction and Maintenance Policies' discussion of Section 1.4.2 of the City's MSCP Subarea Plan, along with an analysis of Project compliance with each requirement.

- *For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or*

duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5

The existing pole structures subject to removal will be removed using hand tools only and access will be through private property and along existing SDG&E maintenance paths of which are approximately 3-foot wide. Crews will access the poles on foot and will use hand tools to remove the pole to the base that will be left in place. The material will be hauled out on foot.

5.2 MHPA Land Use Adjacency Guidelines (§1.4.3)

The Project area occurs within and adjacent to MHPA land associated with the Kensington Hillside Open Space. Projects occurring adjacent to the City's MHPA, or preserve, must adhere to the City's MHPA land use adjacency guidelines as outlined in section 1.4.3 of City's MSCP Subarea Plan. The guidelines and analyses of Project conformance are as follows. Please see section 5.2.1 for a discussion of area-specific management directives for MSCP covered species that have been documented on-site.

Table 2. MHPA LUAG Compliance		
MHPA Adjacency Guidelines Section 1.4.3 of the HSCP Subarea Plan	**Applicability**	**Implementation**
Drainage: All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA	The majority of the project occurs within the existing ROW. The Project will not result in new storm drain structures.	All construction activities associated with underground operations (trenching, potholing, storage, staging, etc.) will occur within the existing ROW. Runoff associated with construction activities would not drain into existing storm drains.
Toxics: Land uses, such as recreation and agriculture, that use chemicals or generate byproducts such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.	The majority of the project occurs within the existing ROW. Any work associated with pole removal will be conducted on foot and with the use of hand tools.	All construction activities associated with underground operations (trenching, potholing, storage, staging, etc.) will occur within the existing ROW. Any use of hazardous construction materials would be used within the ROW, such as fuel used for hand tools associated with pole removal.
Lighting: Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	Replacement and/or new streetlights may be installed within the urban area.	All lighting would be installed within the developed right-of-way. Light overspill into the MHPA would be buffered by existing residential structures and ornamental landscaping.
Noise: Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should	Within the MHPA, there is suitable habitat for coastal cactus wren and Cooper's hawk.	The majority of the project activities (trenching and urban pole removal) occur within the street or residential backyards not adjacent to the MHPA. Wildlife within the MHPA adjacent to trenching and urban pole removal areas will be buffered by the existing houses and landscaping and are unlikely to be affected by noise. To comply with LUAG, project activities that are not as described above but are within natural areas adjacent to and within the MHPA will be restricted to outside of

Table 2. MHPA LUAG Compliance		
MHPA Adjacency Guidelines Section 1.4.3 of the HSCP Subarea Plan	**Applicability**	**Implementation**
also be incorporated for the remainder of the year.		the nesting season as described in AMM-1. Nesting season for these species collectively would be from January 15 to September 15.
Barriers: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	The project consists of removing existing poles and trenching for installation of utilities within the existing ROW. No permanent barriers are required or proposed for this project.	Not applicable
Invasives: No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	No ornamental landscaping is proposed as part of project development. A revegetation plan will not be necessary as there will be no soil disturbance in undeveloped areas. All ground disturbing activities will be conducted within the existing ROW.	Not Applicable
Brush Management: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA.	The project would not require brush management as it would not include any flammable structures requiring fire protection.	Not Applicable
Grading/Land Development: Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.	No manufactured slopes are anticipated within or adjacent to the MHPA. Pole removal activities consist of hand removal of poles and removal of material on foot.	Not Applicable
MHPA: Multi-Habitat Planning Area; HSCP: Health and Safety Contingency Plan; MM: Mitigation Measure; DSD: Development Services Department; MMC: Mitigation Monitoring Coordination.		

5.3 GENERAL MANAGEMENT DIRECTIVES (§1.5.2)

Section §1.5.2 does includes directives that could potentially be applicable to the project. Each directive and analysis of each is provided below.

5.3.1 Mitigation

- *Mitigation, when required as part of project approvals, shall be performed in accordance with the City of San Diego Environmentally Sensitive Lands Regulations (ESL) and Biology Guidelines.*

No mitigation is required for this project as impacts to upland habitats are minimal and considered not significant under CEQA.

5.3.2 Restoration

- *Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring, and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.*

No restoration or revegetation is needed for this project as impacts to sensitive habitat are temporary and limited. Temporary impacts will incur through trampling and/or trimming of vegetation and no grading or ground disturbance is anticipated. Poles will be cut to grade and the butts left in place to avoid ground disturbance.

5.3.3 Public Access, Trails, and Recreation

5.3.3.1 Priority 1

- *Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than 4-feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley where other agreements have been made, in Mission Trails Regional Park, where appropriate, and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.*

It is assumed that in areas where designated access paths may be overgrown, minor trimming of branches to widen the path up to 3-feet in width complies with the General Management Directives regarding Public Access Trails Priority 1 as described above. In addition, the access paths are considered temporary and vegetation is expected to recover within one growing season.

Sensitive plant resources have been observed within and adjacent to the project sites in natural areas. To

ensure compliance with the MSCP so that impacts to sensitive plant species is avoided AMM-2, AMM-3 and AMM-4 will be implemented.

5.4 Area Specific Management Directives (§1.2.3 and Attachment A of the MSCP Subarea Plan)

Area Specific Management Directives (ASMD) for the region containing the project, "Other Urban Habitat Areas", are not applicable for this project as it does not occur within the San Diego River Corridor or Mission Bay.

5.5 Conditions of Coverage for MSCP Covered Species (Attachment A of the MSCP Subarea Plan)

MSCP-covered species that were observed within the survey area or were determined to have a moderate or high potential of occurring (Appendix B) were analyzed for consistency with the conditions of coverage as presented in Attachment A of the MSCP Subarea Plan (1997).

5.5.1 Plants

The following MSCP-covered plant species have a moderate/high potential for occurrence on-site: wart-stemmed ceanothus, variegated dudleya, and Palmer's goldenbush. The following MSCP-covered plant species was present on-site: San Diego barrel cactus. Consistency with Conditions of Coverage are assessed for each species below.

5.5.1.1 wart-stemmed ceanothus

Wart-stemmed ceanothus is an MSCP covered species; thus take of the species is allowed for projects that comply with the City's MSCP implementing regulations. Following is the MSCP condition of coverage for this species (Subarea Plan Appendix A):

Revegetation efforts within appropriate habitats must include restoration of this species. Area specific management directives for the protected populations must include specific measures to increase populations. Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire. Any newly found populations should be evaluated for inclusion in the preserve strategy through acquisition, like exchange, etc.

Limited trimming of this species may be required, which is unlikely to permanently damage the plant, in order to access the pole locations but removal of individual plants is not anticipated. Therefore, permanent impacts to this species are not anticipated. Avoidance and Minimization Measures will ensure that impacts to this species is avoided. AMM-2 will ensure that construction crews are aware of biological resources and restrictions through educational training prior to commencement of construction.AMM-3 will ensure that any individuals observed are flagged for avoidance and AMM-4 will ensure the presence of a monitor so that this species is not accidentally collected/removed and that only paths delineated by the biologist are utilized. This species was not observed onsite but any newly found populations will be evaluated for inclusion in the preserve.

5.5.1.2 variegated dudleya

Variegated dudleya is an MSCP covered species; thus take of the species is allowed for projects that comply with the City's MSCP implementing regulations. Following is the MSCP condition of coverage for this species (Subarea Plan Appendix A):

Area specific management directives must include species-specific monitoring and specific measures to protect against detrimental edge effects to this species, including effects caused by recreational activities. Some populations now occur within a major amendment area (Otay Mountain) and at the time permit amendments are proposed, strategies to provide protection for this species within the amendment area must be included. (Proposed take authorization amendments will have public review through CEWX and NEPA processes and require approval by CDFG and USFWS.)

Avoidance and Minimization Measures will ensure that impacts to this species is avoided. AMM-2 will ensure that construction crews are aware of biological resources and restrictions through educational training prior to commencement of construction.AMM-3 will ensure that any individuals observed are flagged for avoidance and AMM-4 will ensure the presence of a monitor so that this species is not accidentally collected/removed and that only paths delineated by the biologist are utilized. This species was not observed onsite but any newly found populations will be evaluated for inclusion in the preserve. Trails used for the project will be temporary so detrimental edge effects as not anticipated.

5.5.1.3 Palmer's goldenbush

Palmer's goldenbush is an MSCP covered species; thus take of the species is allowed for projects that comply with the City's MSCP implementing regulations. Following is the MSCP condition of coverage for this species (Subarea Plan Appendix A):

Impacts from these projects will be fully mitigated through avoidance, minimization and compensation. Two of the six major populations are subject to potential impacts from proposed road widening projects (Jamacha Blvd., Highways 54/94).

Limited trimming of this species may be required, which is unlikely to permanently damage the plant, but removal of individual plants is not anticipated. Therefore, permanent impacts to this species are not anticipated. Avoidance and Minimization Measures will ensure that impacts to this species is avoided. AMM-2 will ensure that construction crews are aware of biological resources and restrictions through educational training prior to commencement of construction.AMM-3 will ensure that any individuals observed are flagged for avoidance and AMM-4 will ensure the presence of a monitor so that this species is not accidentally collected/removed and that only paths delineated by the biologist are utilized. This species was not observed onsite but any newly found populations will be evaluated for inclusion in the preserve.

5.5.1.4 San Diego Barrel Cactus

San Diego barrel cactus is an MSCP covered species; thus take of the species is allowed for projects that comply with the City's MSCP implementing regulations. Following is the MSCP condition of coverage for this species (Subarea Plan Appendix A):

Area specific management directives must include measures to protect this species from edge effects, unauthorized collection, and include appropriate fire management/control practices to protect against a too frequent fire cycle.

Avoidance and Minimization Measures will ensure that impacts to this species is avoided. AMM-2 will

ensure that construction crews are aware of biological resources and restrictions through educational training prior to commencement of construction.AMM-3 will ensure that any individuals observed are flagged for avoidance and AMM-4 will ensure the presence of a monitor so that this species is not accidentally collected/removed and that only paths delineated by the biologist are utilized. This species was not observed onsite but any newly found populations will be evaluated for inclusion in the preserve.

5.5.2 Wildlife

The following MSCP-covered wildlife species have moderate/high potential to occur on-site: coastal cactus wren. The following MSCP-covered wildlife species were present on-site: Cooper's hawk. Consistency with Conditions of Coverage are assessed for each species below.

5.5.2.1 Cooper's Hawk

- *Conditions: In the design of future projects within the Metro-Lakeside-Jamul segment, design of preserve areas shall conserve patches of oak woodland and oak riparian forest of adequate size for nesting and foraging habitat. Area specific management directives must include a 300-foot impact avoidance areas around the active nests, and minimization of disturbance in oak woodlands and oak riparian forests.*

The project does not occur within the Metro-Lakeside-Jamul segment. To avoid impacts to this species, project activities within natural areas assessed in this report will be restricted to outside of the nesting season. The nesting season is defined as Jan 15 –Sept 15.

5.5.2.2 Coastal Cactus Wren

- *Conditions: The restoration of maritime succulent scrub habitat as specified in the Otay Ranch RMP and GDP must occur at the specified 1:1 ratio. Area specific management directives must include restoration of maritime succulent scrub habitat, including propagation of cactus patches, active/adaptive management of cactus wren habitat, monitoring of populations within preserves and specific measures to reduce or eliminate detrimental edge effects. No clearing of occupied habitat may occur from the period of February 15 through August 15.*

Impacts to habitat for coastal cactus wren are not anticipated for this project. To avoid impacts to this species, project activities within natural areas assessed in this report will be restricted to outside of the nesting season. The nesting season is defined as Feb 15 –Sept 15.

6 PROJECT IMPACT ANALYSIS

6.1 DIRECT IMPACTS

6.1.1 Vegetation Communities/Land Uses

No permanent impacts to sensitive vegetation communities are anticipated as a result of this project. Temporary impacts resulting from pole removal and vegetation trimming (not removal) for access to the poles is anticipated. There will be no ground disturbing activities within ESL as pole butts will be cut to ground level and left in place, and all trimmed vegetation is expected to recover within one growing season. Project activities are estimated to temporarily impact approximately 0.739 acre of Tier IV habitat. Pursuant to the City of San Diego's Significance Determination Guidelines Under the California Environmental Quality Act (2012), impacts on Tier IV habitats are not considered significant and do not require mitigation. Project

activities have the potential to temporarily impact scrub oak chaparral (Tier 1), coastal sage scrub (Tier II) and chaparral (Tier IIIA) habitat from access and pole removal activities. Impacts to Tier I, II and IIIA habitats is considered temporary because only minor trimming is expected, no impacts to the root ball will occur. A total of 0.106 acre of Tier I, II and Tier IIIA habitats are anticipated to be temporarily impacted by this project. Impacts to sensitive habitats are temporary and will not adversely affect the habitat and are not considered significant; no mitigation will be required.

Table 3. Project Impacts on Vegetation Communities/Land Uses

Vegetation Community	Tier Level	Inside the MHPA (Acreage)	Outside the MHPA (Acreage)	Total (Acreage)
Scrub Oak Chaparral	I	*0 (4.356sqft)	0	*0 (4.356sqft)
Chaparral	IIIA	0.031	0.011	0.042*
Disturbed Chaparral	IIIA	0.020	0.044	0.064*
Non Native Vegetation	IV	0.021	0.079	0.100*
Non Native Woodland	IV	0.001	0.087	0.088*
Ornamental/Developed	IV	0.053	0.487	0.540
Bare Ground	IV	0.007	0.004	0.011
	Total	**0.133**	**0.712**	**0.845**

* Impacts are too small to be reflected in acreage; therefore, square feet is also reported.

6.1.2 Sensitive Species

Permanent impacts to sensitive plant species is not anticipated. The following plant species have a moderate/high potential for occurrence onsite or were present onsite: California adolphia, singlewhorl burrobrush, wart-stemmed ceanothus, long-spined spineflower, summer holly, variegated dudleya, San Diego barrel cactus and Nuttall's scrub oak. Impacts to these species are not anticipated as no permanent impacts to habitat will occur. Trimming of perennial shrub species may be required for access but no plant removal is anticipated. Variegated dudleya and San Diego barrel cactus will be avoided by altering access routes or construction methods. In addition, permanent impacts to these species will be avoided with adherence to AMM-2, AMM-3, and AMM-4.

Permanent impacts to sensitive wildlife species is not anticipated. The following wildlife species have a moderate/high potential for occurrence on-site or were observed onsite: coastal cactus wren, and Cooper's hawk. Construction is limited to outside of the nesting season for Cooper's hawk and coastal cactus wren (January 15- September 15, AMM-1) and habitat for these species will not be permanently impacted; therefore, impacts to these species is not anticipated.

6.1.3 Wetlands and Wetland Buffers

No federal wetlands or potential non-wetland ephemeral waters occur within the Project or within more than 100 feet of the survey area. There are no areas that qualify as a City jurisdictional wetlands (see Section 4.1). No significant adverse impact to wetlands or potential non-wetland ephemeral waters would occur with implementation of the Project.

6.1.4 Wildlife Corridors

The Project area is not identified as an MSCP regional wildlife corridor. The open space park is isolated, with no adjacent native habitats. However, the habitat is a large, intact area of native habitat and serves as a local 'stepping stone' for avian species. The Project does not propose any new barriers such as fencing or development that would preclude wildlife movement. Further, the Project proposes to remove existing poles within natural areas and the removal of these poles will ultimately decrease public access to the lands within the MHPA and increase habitat for wildlife. As such, no impacts on wildlife corridors would occur with Project implementation.

6.2 Indirect Impacts

Trenching for the Project would entail extensive earthwork construction activities with the potential to generate dust and trenching and pole removal will create noise. Project contractors will be required to implement standard dust control measures, and with these in place, and given the temporary nature of dust-generating activities, construction dust is not expected to result in significant impacts on biological resources.

All construction within the natural, unpaved areas described in this report will occur outside of the nesting season as described in AMM-1 so that noise generated from construction will not disturb nesting activities of avian species.

The Project will require a storm water pollution plan, which will include measures to control erosion during and following construction. With the storm water pollution plan in place, significant impacts associated with accelerated erosion of disturbed ground are not expected.

6.3 Cumulative Impacts

Cumulative impacts include both the potential regional (long-term, additive) effects of a project and the ways a project, in combination with other Projects and conditions in a region, may affect an ecosystem or one of its components beyond the Project limits and on a regional scale. Because the Project would be consistent with the City of San Diego's MSCP, a regional conservation plan, and there would be no cumulatively significant biological impacts.

7 Avoidance and Minimization Measures

The following measures shall be incorporated into the project design, and included on the project plans and in the contract specifications. These measures were designed and developed to avoid and minimize impacts to biological resources, ensuring consistency with several MSCP Subarea Plan directives and compliance with the City's other MSCP implementing regulations.

7.1 Pre-construction Avoidance and Minimization Measure

7.1.1 AMM-1

- Avian Protection Requirements - To avoid direct and indirect impacts to any species identified as a listed, candidate, sensitive, or special status species in the MSCP, construction activities in natural, unpaved areas outlined in this report will not occur during the nesting season. Nesting season is defined as January 15 to September 15 to include typical nesting time frames for Cooper's hawk and coastal cactus wren.

7.1.2 AMM-2

- Biologist Verification -The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

- Preconstruction Meeting - The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

- Biological Documents - The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

- BCME -The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

- Education –Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

7.1.3 AMM-3

- Resource Delineation - Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

7.2 Construction Avoidance and Minimization Measures

7.2.1 AMM-4

- **Monitoring**- All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar

damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- **Subsequent Resource Identification -** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

7.3 Post-Construction Avoidance and Minimization Measures

7.3.1 AMM-5

- In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

8 Mitigation Measures and Compensatory Mitigation

No impacts to ESL exceeded significance thresholds; therefore, mitigation is not required.

9 References

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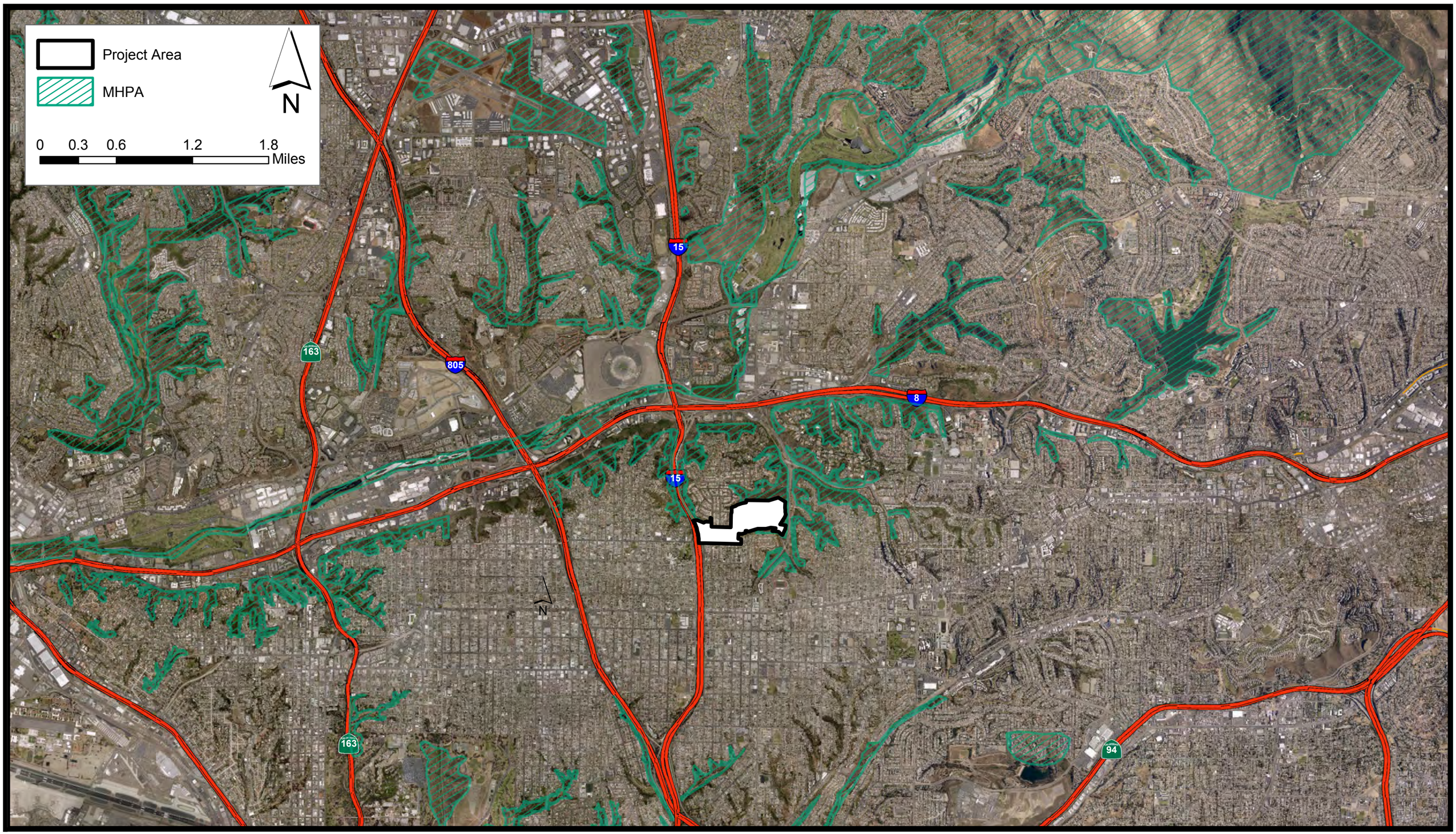
Appendix A: Project Maps

The City of SAN DIEGO Public Works

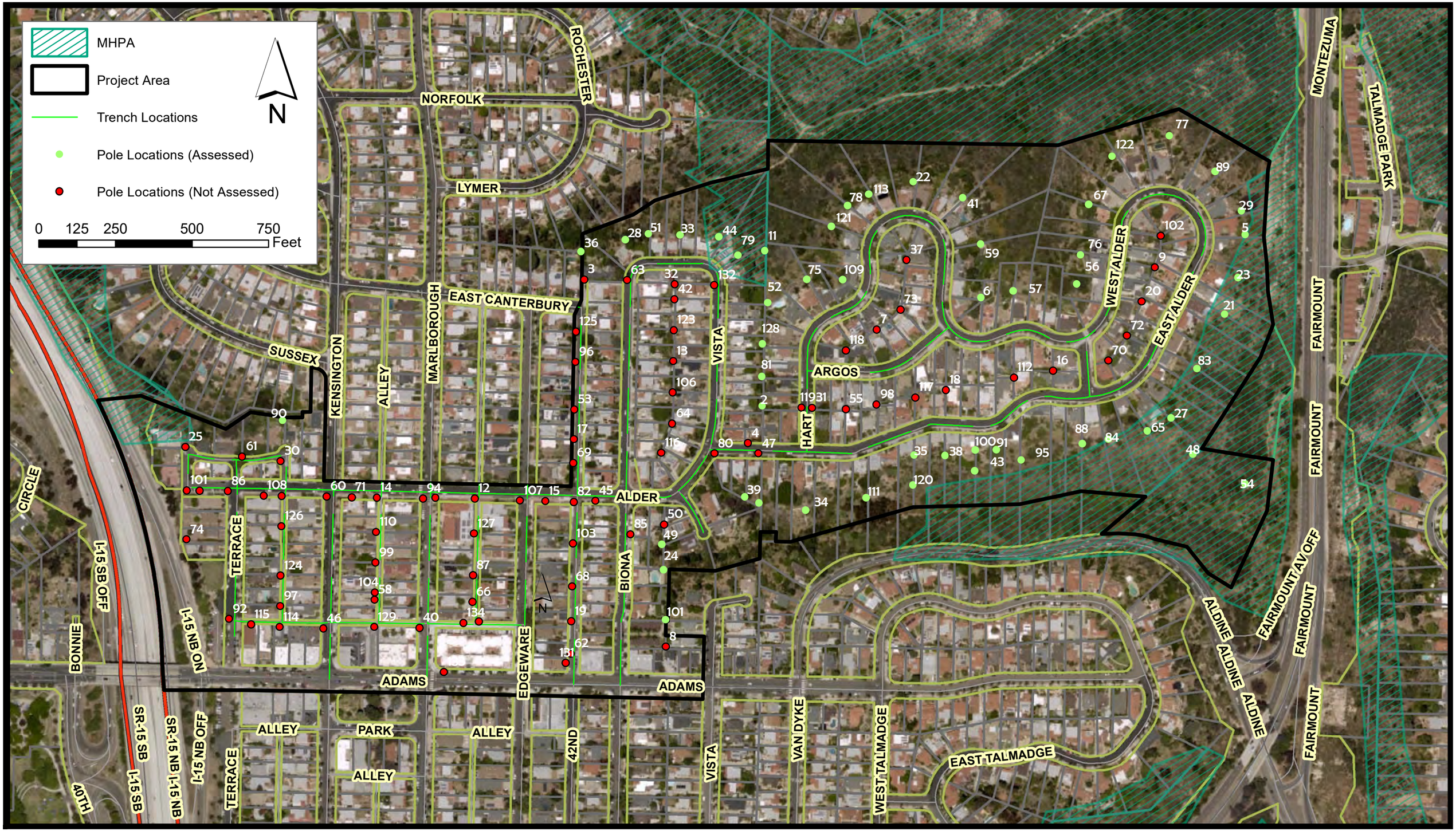
Group 160621 Underground Utility Districts Creation: Block 2CC1 Project Vicinity Map



Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Pole and Trench Locations Map



Date: January 21, 2019

AN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Survey Area Vegetation Map

MHPA

Pole Location Numbers

Vegetation Community

- Bareground
- Chaparral
- Disturbed Chaparral
- Non Native Vegetation
- Non Native Woodland
- Ornamental
- Scrub Oak Chaparral

N

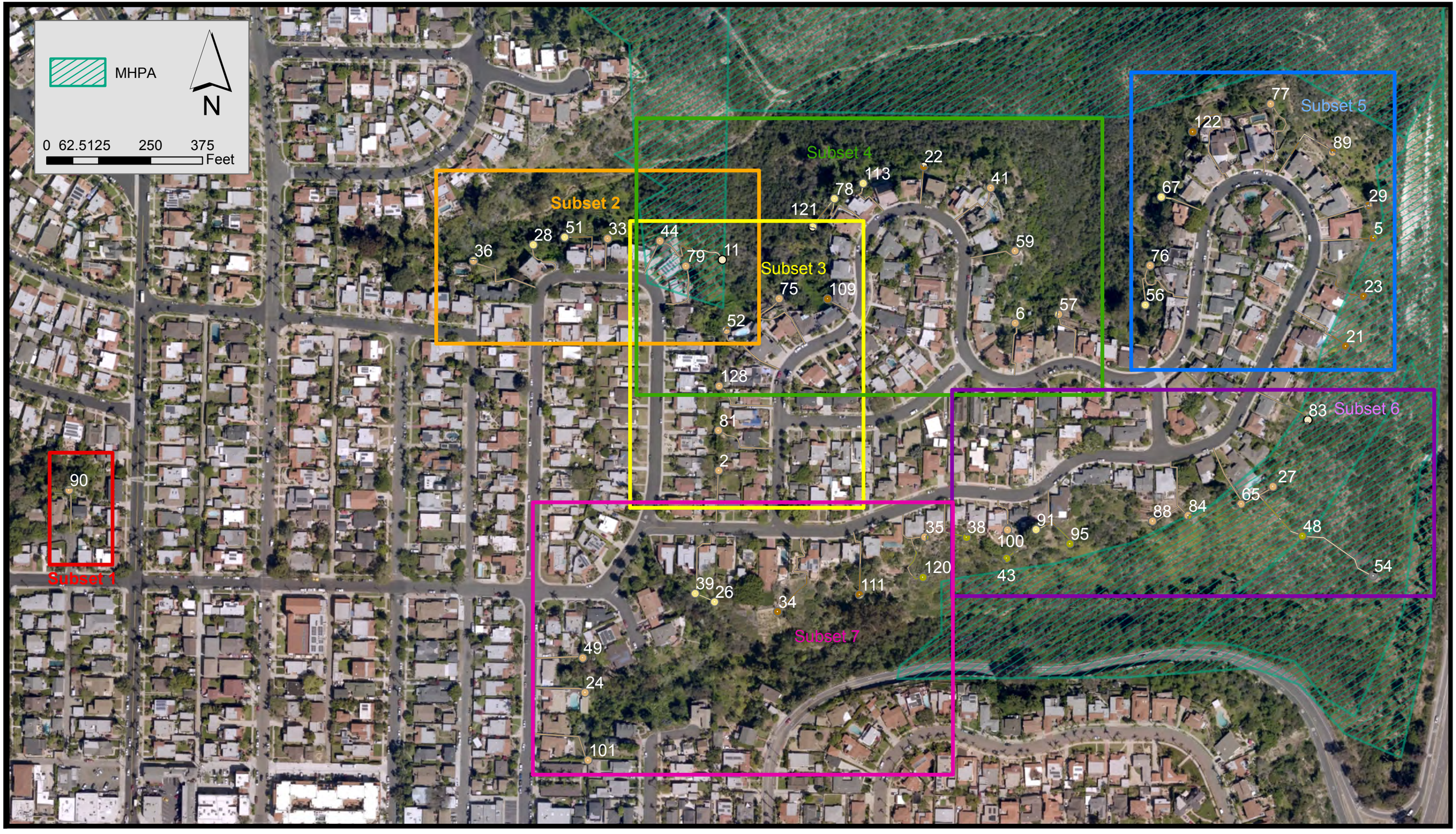
0 120 240 480 720 Feet

ALLEY
HASTINGS
MONTEZUMA
ROCHESTER
NORFOLK
NORFOLK
TALMADGE PARK
LYMER
FAIRMOUNT
WEST ALDER
EAST ALDER
EAST CANTERBURY
SUSSEX
VISTA
ARGOS
HART
KENSINGTON
ALLEY
MARLBOROUGH
ALDER
EDGEWARE
42ND
BIONA
VISTA
FAIRMOUNT
NORMA
ALDINE
TERRACE
I-15 SB
I-15 NB
SR-15 SB
SR-15 NB
I-15 NB ON
NORTH TALMADGE
ALDINE
FAIRMOUNT
VISTA
VAN DYKE
ADAMS
ADAMS

ate: January 21, 2019

The City of SAN DIEGO Public Works

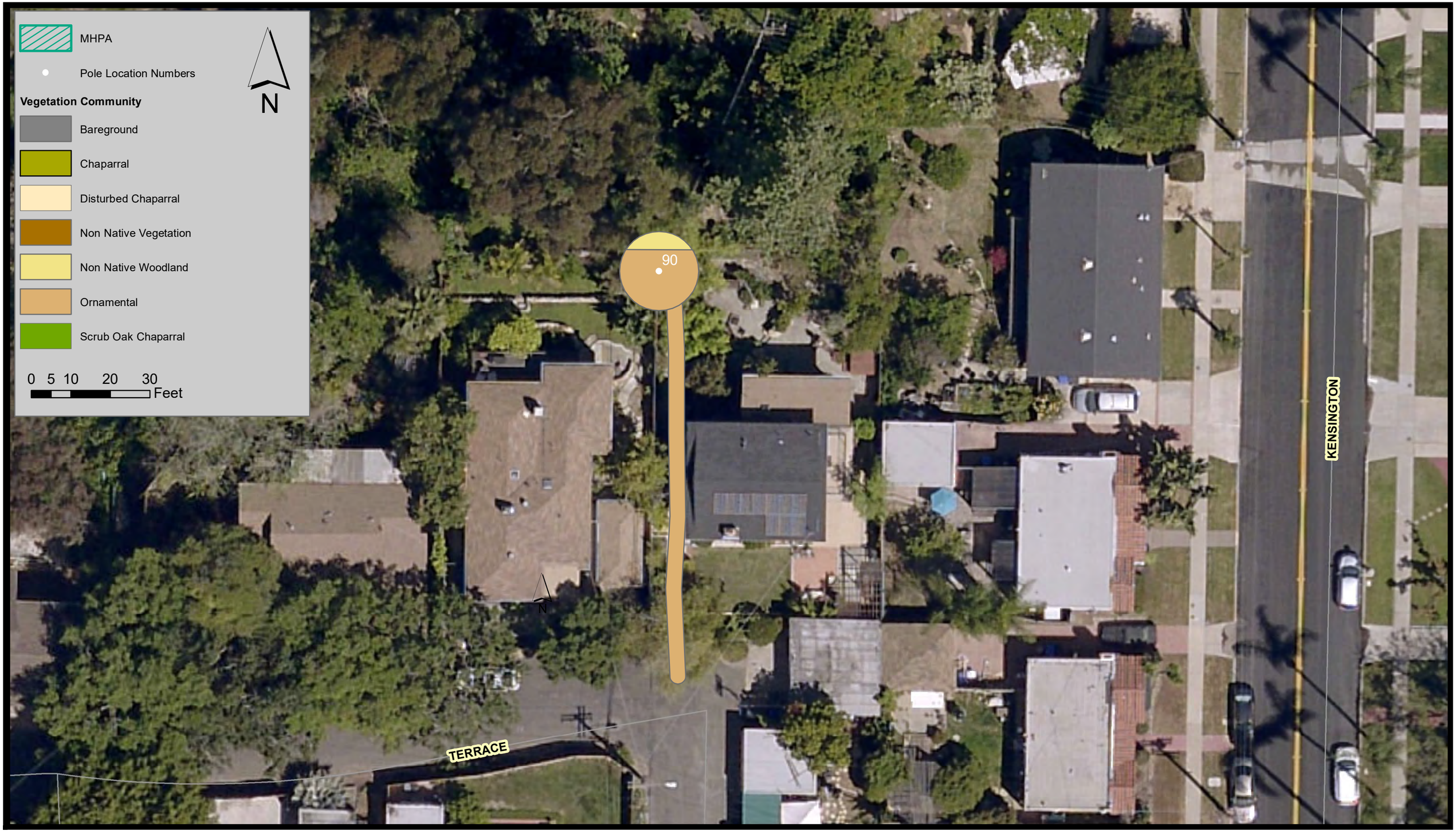
Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map



Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 1)



Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 2)

Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 3)

Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 4)

Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 5)

Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 6)

Date: January 21, 2019

The City of SAN DIEGO Public Works

Group 160621 Underground Utility Districts Creation: Block 2CC1 Impact Area Vegetation Map (Subset 7)

Date: January 21, 2019

Appendix B: Potential to Occur Tables

Sensitive Fauna: Potential to Occur Table			
Scientific Name	Common Name	Ranking	Potential to Occur
Accipiter cooperi	Cooper's Hawk	MSCP, CDFW Watchlist	Present. Observed during field visit.
Agelaius tricolor	tricolored blackbird	MSCP, SSC, Candidate CESA Endangered	Low potential. Appropriate habitat not present.
Anniella stebbinsi	southern California legless lizard	SSC	Low potential. Appropriate habitat is present; however, most recent observation was in 1976.
Arizona elegans occidentalis	California glossy snake	SSC	Low potential. Appropriate habitat is present; however, most recent observation was in 1942.
Athene cunicularia	burrowing owl	MSCP, SSC	Low potential. Appropriate habitat no present.
Branchinecta sandiegonensis	San Diego fairy shrimp	FE, MSCP, VPHCP	Low potential. Appropriate habitat no present.
Buteo swainsoni	Swainson's hawk	CT, MSCP	Low potential. Appropriate habitat present; however, last sighting was in 1926 and observations within San Diego County are documented to be rare.
Campylorhynchus brunneicapillus sandiegensis	coastal cactus wren	SSC, MSCP	Moderate potential. Appropriate habitat is present.
Choeronycteris mexicana	Mexican long-tongued bat	SSC	Low potential. Appropriate habitat is present for foraging; however, appropriate roosting and nursery sites are not present.
Coccyzus americanus occidentalis	western yellow-billed cuckoo	FT, CE	Low potential. Appropriate habitat is present; however, most recent observation was in 1920.
Coturnicops noveboracensis	yellow rail	SSC	Low potential. Appropriate habitat not present.
Eumops perotis californicus	western mastiff bat	SSC	Low potential. Appropriate habitat not present.
Lasiurus xanthinus	western yellow bat	SSC	Low potential. Appropriate habitat not present.
Laterallus jamaicensis coturniculus	California black rail	ST	Low potential. Appropriate habitat not present.
Nyctinomops femorosaccus	pocketed free-tailed bat	SSC	Low potential. Appropriate habitat not present.
Nyctinomops macrotis	big free-tailed bat	SSC	Low potential. Appropriate habitat not present.
Phrynosoma blainvillii	coast horned lizard	SSC, MSCP	Low potential. Appropriate habitat not present.
Polioptila californica californica	coastal California gnatcatcher	FT, SSC, MSCP	Low potential. Appropriate habitat not present.
Spea hammondii	western spadefoot	SSC	Low potential. Appropriate habitat not present.
Sternula antillarum browni	California least tern	FE, SE, MSCP	Low potential. Appropriate habitat not present.
Thamnophis hammondii	two-striped gartersnake	SSC	Low potential. Appropriate habitat not present.
Vireo bellii pusillus	least Bell's vireo	FE, SE, MSCP	Low potential. Appropriate habitat not present.
Sensitive Flora: Potential to Occur Table			
Scientific Name	Common Name	Ranking	Potential to Occur
Acanthomintha ilicifolia	San Diego thorn-mint	FE, SE, CRPR 1B, MSCP	Low potential. Appropriate vegetation communities are present but no appropriate soil type.

Scientific Name	Common Name	Ranking	Potential to Occur
Adolphia californica	California adolphia	CRPR 2B.1	Moderate potential. Potential habitat present. Minor trimming of species may be required for access but removal and ground disturbance is not anticipated.
Ambrosia monogyra	singlewhorl burrobrush	CRPR 2B.2	Moderate potential. Potential habitat present. Minor trimming of species may be required for access but removal and ground disturbance is not anticipated.
Ambrosia pumila	San Diego ambrosia	CRPR 1B, MSCP, NE	Low potential. Potential habitat present; however, sites are too dry to support species.
Aphanisma blitoides	aphanisma	CRPR 1B.2, MSCP, NE	Low potential. Appropriate habitat not present.
Atriplex coulteri	Coulter's saltbush	CRPR 1B.2	Low potential. Appropriate habitat not present.
Atriplex pacifica	south coast saltscale	CRPR 1B.2	Low potential. Appropriate habitat not present.
Bloomeria clevelandii	San Diego goldenstar	CRPR 1B.1	Low potential. Potential habitat present; however, vegetation removal and ground disturbance is not anticipated.
Brodiaea orcuttii	Orcutt's brodiaea	CRPR 1B.1, MSCP	Low potential. Appropriate vegetation communities are present but no appropriate soil type.
Ceanothus verrucosus	wart-stemmed ceanothus	CRPR 2B.2, MSCP	Moderate potential. Potential habitat present. Minor trimming of species may be required for access but removal and ground disturbance is not anticipated.
Chorizanthe polygonoides var. longispina	long-spined spineflower	CRPR 1B.2	Moderate potential. Potential habitat present; however, vegetation removal and ground disturbance is not anticipated.
Comarostaphylis diversifolia ssp. diversifolia	summer holly	CRPR 1B.2	Moderate potential. Potential habitat present. Minor trimming of species may be required for access but removal and ground disturbance is not anticipated.
Cylindropuntia californica var. californica	snake cholla	CRPR 1B, MSCP, NE	Low potential. Potential habitat present but outside of elevational range for species.
Dudleya variegata	variegated dudleya	CRPR 1B.2, MSCP, NE	Moderate potential. Potential habitat present; however, vegetation removal and ground disturbance is not anticipated.
Ericameria palmeri var. palmeri	Palmer's goldenbush	CRPR 1B.1, MSCP	Low potential. Potential habitat present; however, sites are too dry to support species.
Eryngium aristulatum var. parishii	San Diego button-celery	FE, SE, CRPR 1B, MSCP, VPHCP	Low potential. Appropriate habitat not present.
Ferocactus viridescens	San Diego barrel cactus	CRPR 2B.1, MSCP	Present. Individuals present outside of footpaths.

Scientific Name	Common Name	Ranking	Potential to Occur
Heterotheca sessiliflora ssp. sessiliflora	beach goldenaster	CRPR 1B.1	Low potential. Potential habitat may be present; however, CNDDB occurrence is dated 1902 in Mission Valley.
Isocoma menziesii var. decumbens	decumbent goldenbush	CRPR 1B.2	Low potential. Potential habitat present but outside of elevational range for species.
Iva hayesiana	San Diego marsh-elder	CRPR 2B.2	Low potential. Appropriate habitat not present.
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	CRPR 1B.1	Low potential. Appropriate habitat not present.
Lepidium virginicum var. robinsonii	Robinson's pepper-grass	CRPR 4.3	Low potential. Potential habitat present; however, historic records are all of an isolated population in La Mesa.
Monardella viminea	willowy monardella	FE, CE, CRPR 1B.1, MSCP	Low potential. Potential habitat present; however, only historical CNDDB occurrence is thought to be extirpated.
Myosurus minimus ssp. apus	little mousetail	CRPR 3.1	Low potential. Appropriate habitat not present.
Pogogyne abramsii	San Diego mesa mint	FE, CE, CRPR 1B.1, MSCP, NE, VPHCP	Low potential. Appropriate habitat not present.
Pogogyne nudiuscula	Otay Mesa mint	FE, CE, CRPR 1B.1, MSCP, NE, VPHCP	Low potential. Appropriate habitat not present.
Quercus dumosa	Nuttall's scrub oak	CRPR 1B.1	Present. Observed during field visit.
Salvia munzii	Munz's sage	CRPR 2B.2	Low potential. Potential habitat present but outside of elevational range for species.
Senecio aphanactis	chaparral ragwort	CRPR 2B.2	Low potential. Potential habitat present; however, CNDDB occurrence is dated 1903 nd 1935 near Mission Gorge.
Stemodia durantifolia	purple stemodia	CRPR 2B.1	Low potential. Appropriate habitat not present.
Stylocline citroleum	oil neststraw	CRPR 1B.1	Low potential. Potential habitat present; however, CNDDB occurrence is dated 1883 and the location in unknown.

Appendix C: Photograph Documentation

ATTACHMENT C – SITE PHOTOGRAPHS

Photo 1. This is a representative photo of Ornamental vegetation, facing northwest.

Photo 2. This is a representative photo of Chaparral vegetation, facing northwest.

Photo 3. This is a representative photo of Non Native vegetation in the foreground, facing northeast.

Photo 4. This is a representative photo of Non Native Woodland in the foreground, facing north.

Photo 5. This is a representative photo of Disturbed Chaparral as indicated by the area within the red circle which is adjacent to Chaparral, facing northwest.

Photo 6. This is a representative photo of Scrub Oak Chaparral intermixed with Chaparral, facing northeast.

Appendix D: Regulatory Language

Regulatory Setting

3.3.1.1 Regulatory Framework

Compliance with all state and federal laws, including MBTA and CDGC is anticipated. Various federal, state, and/or local regulations or policies apply to biological resources on or adjacent to the project parcels and are summarized below.

a. Federal Regulations

The Rivers and Harbors Act of 1899 and the Clean Water Act (CWA) regulate project activities within non-marine navigable waters and/or waters of the U.S. The discharge of any pollutant from a point source into navigable waters is illegal unless a permit under the CWA's provisions is acquired. Permitting for projects that include both permanent and temporary dredging and filling in wetlands and waters of the U.S. is overseen by the ACOE under Section 404 of the CWA. Projects can be permitted on an individual basis or be covered by one of several approved nationwide or regional general permits.

The federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered 'take' under the ESA. Section 9(a) of the ESA defines 'take' as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." The ESA is administered by the USFWS.

The Migratory Bird Treaty Act (16 United States Code 703 et seq.), or MBTA, is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and is listed at 50 Code of Federal Regulations (CFR) 10.13. The regulatory definition of "migratory bird" is broad, and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 CFR 10.12). The MBTA, which is enforced by USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11). Pursuant to U.S. Department of the Interior Memorandum M-37050, the federal Migratory Bird Treaty Act is no longer interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

b. State Regulations

The California Environmental Quality Act (CEQA) requires an environmental review for projects with potentially adverse impacts on the environment. Adverse environmental impacts are typically mitigated in accordance with state laws and regulations.

The California ESA is similar to the federal ESA in that it provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction.

Section 3503 of the California Fish and Game Code states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto," and Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird" unless authorized (State of California 1991).

The California Fish and Game Code (Sections 1600 through 1603) regulates project activities within wetlands and riparian habitats. The CDFW can issue a Streambed Alteration Agreement for projects affecting riparian and wetland habitats.

Project activities that fill or dredge within wetland waters of the U.S. and waters of the U.S. as well as wetland waters of the state and waters of the state, including isolated waters such as vernal pools and other waters showing lack of connectivity to a Traditional Navigable Waters, require a Water Quality Certification by the California Regional Water Quality Control Board (RWQCB) under Section 401 of the CWA and Section 13000 et seq. of the California Water Code under the Porter-Cologne Water Quality Control Act.

c. Local Regulations

One of the primary objectives of the City's MSCP Subarea Plan is to identify and maintain a preserve system, which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as "core biological resource areas." "Linkages" between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City's MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources.

The City's Biology Guidelines (2012) were formulated to aid in the implementation and interpretation of the ESL Regulations, San Diego Land Development Code (LDC), Chapter 14, Division 1, Section 143.0101. Section III of the Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impacts and mitigation under CEQA. The ESL defines sensitive biological resources as those lands included within the MHPA as identified in the City's MSCP Subarea Plan (City of San Diego1997), and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I (rare uplands), II (uncommon uplands), IIIA (common uplands) or IIIB (common uplands); habitat for rare, endangered, or threatened species; or narrow endemic species.

The City of San Diego Vernal Pool Habitat Conservation Plan (VPHCP; City of San Diego 2017) provides a regulatory framework to protect, enhance, and restore vernal pool resources in specific areas within the City's jurisdiction, while improving and streamlining the

environmental permitting process for impacts to threatened and endangered species associated with vernal pools. The VPHCP is a conservation plan for vernal pools and seven threatened and endangered species that do not have federal coverage under the City's MSCP Subarea Plan, including five plant and two crustacean species. The VPHCP expands the City's existing MHPA established in the MSCP Subarea Plan to conserve additional lands with vernal pools that are occupied with the vernal pool covered species. Implementation of the VPHCP occurs through permanent protection of existing City-owned land for the conservation of vernal pools, conservation of private lands through the development entitlement process, the permanent management and monitoring of these lands, and annual reporting to the Wildlife Agencies that accounts for all take authorized, conservation achieved, and compliance and effectiveness monitoring. While the City Biology Guidelines generally require the presence of a vernal pool indicator plant species for a depression to be considered a "vernal pool," the VPHCP applies to human-made seasonally flooded depressions if they contain one or more VPHCP covered plant or wildlife species (City of San Diego 2017).

3.3.1.2 Sensitivity Criteria

Sensitive vegetation communities are vegetation assemblages, associations, or subassociations that have cumulative losses throughout the region, have relatively limited distribution, support or potentially support sensitive species, have particular value to other wildlife, or have a combination of these characteristics. Typically, sensitive vegetation communities are considered sensitive whether or not they have been disturbed. Sensitive vegetation communities are regulated by various local, state, and federal resource agencies. For purposes of this report, sensitive vegetation communities include all wetland communities and upland communities identified as Tier I, II, IIIA, or IIIB by the City (2012).

In accordance with the ESL Regulations, lands within the MHPA and habitat for sensitive species will also be considered sensitive biological resources.

For purposes of this report and in accordance with the City Guidelines for Conducting Biology Surveys (City of San Diego 2002), plant and wildlife species will be considered sensitive if they are: (1) listed by state or federal agencies as rare, threatened, or endangered or are proposed for listing; (2) designated by the City as a narrow endemic species (City of San Diego 1997, 2012); (3) covered species under the MSCP or VPHCP; (4) given a California Rare Plant Rank (CRPR) 1B (considered endangered throughout its range), 2 (considered endangered in California but more common elsewhere), 3 (more information about the plant's distribution and rarity needed), or 4 (plants of limited distribution) in the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (2017); (5) considered rare, endangered, or threatened by CDFW (2017b–e); or (6) identified by another recognized conservation or scientific group as being depleted, potentially depleted, declining, rare, critical, endemic, endangered, or threatened.

3.3.2 Sensitive Vegetation Communities

Pursuant to the City's Biology Guidelines, five sensitive vegetation communities occur within the project parcels. Mule fat scrub is considered a wetland habitat (i.e., riparian scrub). Maritime succulent scrub and disturbed maritime succulent scrub are considered Tier 1 (rare uplands) habitats, and Diegan coastal sage scrub and disturbed Diegan coastal sage scrub are considered Tier II (uncommon uplands) habitats.