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Mr. Joe Esposito
Estrada Land Planning
225 Broadway, Suite 1160
San Diego, CA 92101

RE: Canyonside Community Park Drainage and Parking Lot Improvement Project Biological Resources Survey

Dear Mr. Esposito:

The purpose of this letter report is to present the findings of the biological resource survey conducted for the Canyonside Community Park Drainage and Parking Lot Improvement Project (project). The purpose of the biological survey is to (1) compile a list of plant and animal species that occur within the site, (2) identify plant communities and distribution, (3) identify potential jurisdictional features, (4) identify potential opportunities and constraints that may occur during proposed project development activities, and (5) disclose potential impacts from the proposed project on biological resources and provide recommendations for mitigation measures.

PROJECT DESCRIPTION

The proposed project is located in the existing Canyonside Community Park at 1235 Black Mountain Road, San Diego, California. The site is specifically located on the northwest corner of the intersection of Black Mountain Road and Canyonside Park Drive in the community of Rancho Peñasquitos within the City of San Diego, California (Figure 1). The proposed project would improve the drainage of an existing dirt parking lot, construct a new tot lot play area, and construct an expanded overflow parking area. This survey covers the drainage improvement areas and expanded parking lot. The tot lot play area project is not included in this report as that project will simply replace existing play features and will not impact any vegetation.

The drainage improvement project limit of work is rectangular in shape and covers 0.22 acre. This project overlaps a concrete/asphalt and dirt parking lot at the western edge of the park, bordering Los Peñasquitos Canyon Preserve. The parking lot expansion project covers 2.24 acres and is located on the northwest edge of the park, north of an existing parking lot.

The area surveyed consisted of a 200-foot survey buffer surrounding the two sites (Figures 2 and 3). This 200-foot buffer around the proposed project area is approximately 15.17 acres (total survey area including two sites is 17.63 acres). The survey provides necessary information to assist the project design team during the engineering and planning phase for the development of the project and to facilitate the City's discretionary review process if necessary.

METHODOLOGY

Prior to conducting the field survey, existing Multiple Species Conservation Program (MSCP) SanGIS data were reviewed to determine if any biologically sensitive resources previously reported have occurred within or adjacent to the study area. In addition, a search of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), U.S. Fish and Wildlife Service (USFWS) database, and California Native Plant Society (CNPS) database was conducted. Locations of sensitive resources in the vicinity of the project are shown in Figure 2.

Applicable local planning policies were reviewed, including the City of San Diego MSCP Subarea Plan (1997a), the City of San Diego Guidelines for Conducting Biology Surveys (1998), and the City of San Diego Land Development Code Biology Guidelines (Biology Guidelines; 1997b). As defined in the City of San Diego Guidelines for Conducting Biology Surveys (City of San Diego 1998), a Letter Survey Report is acceptable for projects involving minimal habitat alteration, highly disturbed areas, and very small sites. Since the proposed project meets all of these requirements, this letter survey report has been prepared.

Due to the project schedule, the survey was conducted at the time of year when spring ephemeral plant species and migratory animal species would not have been easily observable. Plant and wildlife species observed on-site are listed in Appendices A and B, respectively.

AECOM biologist Sundeep Amin conducted a biological survey on December 23, 2015. The survey was conducted by walking through the 17.63-acre project site boundary, including the surrounding 200-foot buffer, and recording plants and animals observed. Vegetation communities were mapped based on the 2008 *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008), on a recent, color aerial photograph at a scale of 1 inch = 200 feet. A wetland determination was performed pursuant to the San Diego Municipal Code (City of San Diego 2012), *Corps of Engineers Wetland Delineation Manual* (1987 Manual) (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (Version 2.0) (2008 Regional Supplement) (Environmental Laboratory 2008).

Wetlands are defined by the San Diego Municipal Code (CH11Art.3Div.1§113) as areas that are characterized by any of the following conditions (City of San Diego 2012):

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;

2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic

wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;

3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;

4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

Field assessment and delineation methodologies were composed of the following:

1) Identification of potential wetlands based on the three-criteria method outlined in the 1987 Manual and 2008 Regional Supplement. The simultaneous presence of the three criteria used to define the type, amount, and extent of wetlands are the following:

   a) hydrophytic vegetation,

   b) hydric soil, and

   c) wetland hydrology.

2) Surveys for field indicators of all potential nonwetland waters of the U.S. (e.g., unvegetated water and/or drainage features) based on field indicators to define the jurisdictional lateral extent by using field indicators of the ordinary high water mark and relevant guidance and procedural documents.

Potential jurisdictional waters of the state were evaluated within the survey area pursuant to California Fish and Game Code (CFGC) Section 1600 *et seq*. (and other relevant guidance). For wetlands and other aquatic habitats occurring in California, CDFW relies on the USFWS wetland definition and classification system, which is based on *Classification of Wetland and Deepwater Habitats of the United States* (Cowardin et al. 1979).

Additionally, CDFW commonly asserts jurisdiction over nonwetland riparian vegetation communities associated with waters of the state (e.g., state jurisdictional rivers, streams, lakes). Although these riparian communities may not be considered aquatic features (e.g., streams, rivers, wetlands), they influence the geomorphic development and evolution of associated streams and rivers, as well as provide wildlife-supporting habitat. Therefore, these nonwetland riparian communities are subject to CDFW purview and CFGC Section 1600 *et seq.* regulations.

SURVEY RESULTS

Vegetation Communities and Cover Types

The entire drainage project footprint is characterized as urban/developed land, consisting of a concrete/asphalt and dirt parking lot. The majority of the parking lot expansion footprint is characterized by disturbed habitat, along with smaller areas of eucalyptus woodland and coastal sage scrub (Figure 3). Vegetation communities present outside of the development footprint but within the 200-foot buffer area included southern willow scrub and baccharis-dominated coastal sage scrub. A brief description of each vegetation community and cover type observed on-site is discussed below (Holland codes are provided in parentheses [Oberbauer et al. 2008]).

Table 1 shows the acreages for each vegetation community and cover type within the each of the proposed project areas and 200-foot buffer. A complete list of plant species observed is included in Appendix A. Representative site photographs are included in Appendix C.

Table 1. Acreages for Observed Vegetation Communities and Cover Types

Vegetation Community (Holland Code)	200 foot buffer (acres)	Drainage Improvement Area (acres)	Parking Lot Expansion Area (acres	Total
Coastal Sage Scrub (32510)	3.97	0	0.29	**4.26**
Coastal Sage Scrub: Baccharis-dominated (32530)	0.27	0	0	**0.27**
Southern Willow Scrub (63320)	0.73	0	0	**0.73**
Eucalyptus Woodland (79100)	0.67	0	0.14	**0.81**
Disturbed Habitat (11300)	3.02	0	1.81	**4.83**
Urban/Developed (12000)	6.51	0.22	0	**6.73**
Total	**15.17**	**0.22**	**2.24**	**17.63**

Coastal sage scrub (32510) – This community is composed of low, soft-woody subshrubs to about 3 feet high, many of which are facultatively drought-deciduous. This community is typically found on dry sites, such as steep, south-facing slopes or clay-rich soils that are slow to release stored water. Dominant shrub species in this vegetation type may vary, depending on local site factors and levels of disturbance. Coastal sage scrub habitat in the survey area occurs on south-facing slopes to the north and west of the project sites. The parking lot expansion site contains 0.29 acre of coastal sage scrub. Dominant species present in this vegetation community on-site include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and laurel sumac (*Malosma laurina*). Other native and nonnative species are also present. Due to the proximity of this community to the disturbed habitat within the survey area, this coastal sage scrub quality is low, with a sparse density of native shrubs and moderate percentage of nonnative grasses and herbs. This vegetation community is a Tier II sensitive habitat, which designates it as an uncommon upland. This community is also considered significant because it provides

habitat for the federally threatened coastal California gnatcatcher (*Polioptila californica* ssp. *californica*).

Coastal sage scrub: Baccharis-dominated (32530) – This community contains typical coastal sage scrub species but is dominated by the presence of Baccharis species. This community occurs entirely within the 200-foot survey buffer to the west of the drainage improvement site. Baccharis species found here include broom baccharis (*Baccharis sarothroides*), coyote brush (*Baccharis pilularis*), and mulefat (*Baccharis salicifolia*) along with other species such as California buckwheat, coast golden bush (*Isocoma menziesii*), and California rose (*Rosa californica*). This area will be completely avoided.

Southern willow scrub (63320) – This community is a type of riparian scrub found on loose, sandy, or fine gravelly alluvium deposited near stream channels during floods with most stands being too dense to allow much understory to develop (Oberbauer et al. 2008). Depending on how dynamic the riparian system is, this community can represent a successional stage leading to riparian woodland or forest, or it can remain stable as is. On-site, this community is a mix between younger scrub habitat and the early stages of riparian woodland. Typical scrub species present include arroyo willow (*Salix lasiolepis*), mulefat, California rose, and Douglas' mugwort (*Artemisia douglasiana*).Woodland species such as Fremont's cottonwood (*Populus fremontii*), coast live oak (*Quercus agrifolia*), and western sycamore (*Platanus racemosa*) are also present, showing the diversity of the community on-site.

Southern willow scrub is a wetland habitat and, as such, is regulated by the resource agencies; however, this community is only present within the 200-foot buffer, mainly south of Canyonside Park Drive within the Multi-Habitat Planning Area (MHPA) along Los Peñasquitos Creek and also in a small isolated patch to the east of the parking lot expansion site. Neither of these areas will be impacted by the project.

Eucalyptus woodland (79100) – Eucalyptus woodland is typically characterized by dense stands of gum trees (*Eucalyptus* spp.). They have increased their cover through natural regeneration, particularly in moist areas sheltered from strong coastal winds. Gum trees naturalize readily and, where they form dense stands, tend to completely supplant native vegetation, greatly altering community structure and dynamics. Very few native plants are compatible with eucalyptus.

Eucalyptus woodland occurs at the northeast portion of the survey area, with a small portion (0.14 acre) occurring within the parking lot expansion site footprint. Scattered eucalyptus trees are also present within the ornamental vegetation on-site within the 200-foot buffer area.

Disturbed Habitat (11300) – Disturbed habitat is any land that has been permanently altered by previous human activity, including grading, repeated clearing, intensive agriculture, vehicular damage, or dirt roads. Disturbed land is typically characterized by more than 50% bare ground and an absence of remnant native vegetation. Disturbed habitat occurs in areas

that were altered by previous disturbance, possibly clearing and/or grading, and are now sparsely vegetated with weedy, predominantly nonnative species. Approximately 1.81 acres of disturbed habitat is present within the parking lot expansion site footprint. Other disturbed habitat within the survey area is found along the western and northwestern edges of the park, located between the developed park and native coastal sage scrub habitat adjacent to the park.

Urban/Developed (12000) – Urban/developed areas within the survey area include paved parking areas, ornamental plantings, grass sports fields, sidewalks, and buildings. Urban/developed areas are not considered a vegetation community and typically support no or very few biological resources. Where ornamental areas are intermixed with developed land, they are included in this category. The drainage improvement site is composed entirely (0.22 acre) of urban/developed cover type in the form of a paved and dirt parking lot.

Wildlife

Wildlife species within the project site are limited due to the lack of and disturbed nature of the habitat. Thirteen bird species, one reptile, and one mammal species were observed within the survey area. The complete list of wildlife species observed is included in Appendix B. No state or federally listed wildlife species were observed or detected during the field survey.

Wildlife Corridors

The project sites are located along the western and northwestern edges of the existing Canyonside Community Park with urban development directly to the north and Los Peñasquitos Canyon Preserve to the west and south. The Preserve is part of the City of San Diego MHPA, which includes a major east-west wildlife movement corridor in the region; however, the implementation of the two projects would not hinder the functionality of this corridor. The drainage improvement and parking lot projects are small in size and located away from the main drainage, which serves as the wildlife movement corridor.

Sensitive Vegetation Communities and Species

Sensitive habitats include wetland habitats; habitats that are ranked by the CNDDB as a community that is rare and worthy of consideration by the CNDDB; and those defined by the City of San Diego Municipal Code as Tier I, II, IIIa, and IIIb (City of San Diego 2011). Within the limits of work, coastal sage scrub is the only sensitive vegetative community observed (City of San Diego Tier II). Within the 200-foot buffer around the project footprint, southern willow scrub is considered sensitive habitat. Southern willow scrub habitat may be considered jurisdictional by the U.S. Army Corps of Engineers (USACE), CDFW, and the Regional Water Quality Control Board. Although planned activities are currently only proposed to impact 0.29 acre of sensitive coastal sage scrub habitat, future activities outside of the present proposed project boundary would require further analysis and potentially additional permitting.

Sensitive plant species are those that are considered federally or state listed as threatened or endangered, and those listed by the CNPS. Similarly, sensitive wildlife species are federally listed or state listed, or state species of special concern. A search of the CNDDB revealed that 14 sensitive plant and five sensitive wildlife species are known from the general vicinity of the project area (i.e., within a 1-mile radius). A list of these species identified in the CNDDB search, including their sensitivity status and presence status at the denoted location, is presented in Table 2. None of these species were observed within either project site or the 200-foot survey buffer during the survey. Most of these species are either not expected to occur within the proposed project site footprints due to the absence of suitable habitat or have a low potential to occur due to the presence of low-quality habitat for the species. Five plant species have a low potential to occur within the parking lot expansion habitat due to the presence of low-quality habitat. These species are perennial and easily identifiable at all times of the year, but were not observed on-site and are noted in the table as such. These species will not require special surveys or further analysis as they are not present on-site. Two wildlife species have potential to occur in the parking lot expansion site, coastal California gnatcatcher and Coronado Island skink (*Plestiodon skiltonianus* ssp. *interparietalis*). Figure 2 presents the historic locations of these some of these sensitive species in the vicinity of the proposed project site.

Table 2
Rare, Threatened, Endangered, Endemic, Sensitive Species, and/or MSCP-Covered Species Potential to Occur within the Survey Area

Common Name	Scientific Name	Species Listing Status[1]	Presence within 200-Foot Buffer of Project Site	Potential to Occur within Drainage Improvement Site	Potential to Occur within Parking Lot Expansion Site
Flora					
decumbent goldenbush	*Isocoma menziesii* var. *decumbens*	CNPS 1B.2	Low potential: suitable habitat present	Not expected; lack of native habitat	Low potential: not observed
California adoplhia	*Adolphia californica*	CNPS 2B.1	Low potential: suitable habitat present	Not expected; lack of native habitat	Low potential: not observed
Nuttall's scrub Oak	*Quercus dumosa*	CNPS 1B.1	Low potential: suitable habitat present	Not expected; lack of native habitat	Low potential: not observed
Orcutt's brodiaea	*Brodiaea orcuttii*	CNPS 1B.1	Low potential; low quality habitat present	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
San Diego ambrosia	*Ambrosia pumila*	FE; CNPS 1B.1	Low potential; low-quality habitat present	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
San Diego barrel cactus	*Ferocactus viridescens*	CNPS 2B.1	Moderate potential; low-quality habitat present	Not expected; lack of suitable habitat	Low potential: not observed

Common Name	Scientific Name	Species Listing Status[1]	Presence within 200-Foot Buffer of Project Site	Potential to Occur within Drainage Improvement Site	Potential to Occur within Parking Lot Expansion Site
San Diego button-celery	*Eryngium aristulatum* var. *parishii*	FE; SE; CNPS 1B.1	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat
San Diego goldenstar	*Bloomeria clevelandii*	CNPS 1B.1	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat
San Diego marsh-elder	*Iva hayesiana*	CNPS 2B.2	Low potential: suitable habitat present	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
San Diego mesa mint	*Pogogyne abramsii*	FE; SE; CNPS 1B.1	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat
San Diego thorn-mint	*Acanthomintha ilicifolia*	FT; SE; CNPS 1B.1	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
snake cholla	*Cylindropuntia californica* var. *californica*	CNPS 1B.1	Moderate potential; suitable habitat present	Not expected; lack of suitable habitat	Low potential: not observed
summer holly	*Comarostaphylis diversifolia* ssp. *diversifolia*	CNPS 1B.2	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
variegated dudleya	*Dudleya variegate*	CNPS 1B.2	Low potential: suitable habitat present	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
Fauna					
big free-tailed bat	*Nyctinomops macrotis*	CDFW SSC	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
coastal California gnatcatcher	*Polioptila californica californica*	FT	Moderate potential; suitable habitat present	Not expected; lack of suitable habitat	Low potential; low-quality habitat present
Coronado Island skink	*Plestiodon skiltonianus interparietalis*	CDFW SSC	Moderate potential; suitable habitat present	Not expected; lack of suitable habitat	Low potential; low-quality habitat present
least Bell's vireo	*Vireo bellii pusillus*	FE; SE	Low potential; suitable habitat present	Not expected; lack of suitable habitat	Not expected; lack of suitable habitat
San Diego fairy shrimp	*Branchinecta sandiegonensis*	FE	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat	Not expected; lack of vernal pool habitat

[1] **FE** – Federally listed as Endangered
FT – Federally listed as Threatened
SE – State listed as Endangered
ST – State listed as Threatened
CDFW SSC – California Department of Fish and Wildlife Species of Special Concern
CNPS California Rare Plant Ranks
1A – Plants presumed extirpated in California and either rare or extinct elsewhere
1B – Plants rare, threatened, or endangered in California and elsewhere

2A – Plants presumed extirpated in California, but common elsewhere
2B – Plants rare, threatened, or endangered in California, but more common elsewhere
3 – Plants about which more information is needed, a review list
4 – Plants of limited distribution, a watch list
Threat Ranks
0.1-Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2-Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3-Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Jurisdictional Assessment

The proposed project sites do not contain areas that are under the jurisdiction of USACE or CDFW; however, the 200-foot buffer of the proposed project boundary contains features that may potentially be under the jurisdiction of both USACE and CDFW. Figure 3 shows two areas mapped as National Wetlands Inventory (NWI) wetlands: the area to the northeast of the parking lot expansion site contains southern willow scrub habitat; the feature directly west of the drainage improvement site is a shallow swale. It is presumed that these areas will be avoided and will not require additional permitting. Final plans for the proposed project will include a Storm Water Pollution Prevention Plan, with construction and post-construction best management practices (BMPs) to control the discharge of potential pollutants into the swale.

No other NWI-designated riparian or wetland areas are within the 200-foot buffer of the proposed project site.

IMPACT ANALYSIS

Biological resources may be directly or indirectly impacted by a project. Direct impacts include alteration, disturbance, or destruction of biological resources. Indirect impacts include impacts such as elevated noise and dust levels, soil compaction, decreased water quality, and introduction of invasive species.

Under City and California Environmental Quality Act guidelines, impacts to biological resources will be considered significant if any of the following occur:

1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS;

2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the City of San Diego Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS;

3. A substantial adverse impact on wetlands (including marsh, vernal pool, riparian) through direct removal, filling, hydrological interruption, or other means;

4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;

5. A conflict with the provisions of an adopted Habitat Conservation Plan; Natural Conservation Community Plan; or other approved local, regional, or state habitat conservation plan, either within the MSCP Plan area or in the surrounding region;

6. Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects;

7. A conflict with any local policies or ordinances protecting biological resources; and/or

8. An introduction of invasive species of plants into a natural open space area.

This analysis is based on the assumption that all proposed activities would be contained within the "Limits of Work" as shown in Figures 2 and 3. Any activities outside of these boundaries will require further analysis to assess potential impacts.

Direct Impacts

Potential direct impacts of this project are limited to the potential impact on 0.29 acre of coastal sage scrub from the parking lot expansion portion of the project. The coastal sage scrub in the area is sparse due to its location between homes on the top of the hill and the community park below. It is low quality due to encroachment of nonnative species from the disturbed habitat that immediately borders it, and its separation from a more contiguous patch of native habitat. Coastal sage scrub is a City of San Diego Tier II sensitive habitat and would require 1.5:1 to 1:1 mitigation depending on the mitigation option chosen.

Mitigation options are discussed in the Conclusion section of this report. Additionally, a portion of the site will be replanted with native vegetation, potentially increasing habitat values. As such, the proposed project will have a less than significant impact. The remaining 1.95 acres of the parking lot expansion project impact disturbed and eucalyptus woodland, which are both Tier IV habitats, and requires no mitigation. The drainage improvement project impacts a total of 0.22 acre of urban/developed land and requires no mitigation.

Coastal California gnatcatcher and Coronado Island skink have a low potential to occur on-site, mainly in the small patches of coastal sage scrub present. Coastal California gnatcatcher is an MSCP covered species and does not require special permitting in this situation. Measures that minimize disturbance during the nesting period satisfy the mitigation requirement for this species. Coronado Island skink does not have species-specific mitigation requirements. If necessary, a biological monitor can search for the skink under rocks and/or debris prior to construction. No other sensitive species or vegetation is present on either site.

Indirect Impacts

Multiple Species Conservation Plan Consistency

The MHPA of the MSCP was designed to capture the key biological core and linkage areas within the City. The MHPA Land Use Adjacency Guidelines are guidelines that are addressed on a project-by-project basis during the planning stage to minimize land use impacts and maintain the function of the MHPA. These guidelines are located in Section 1.4.3 of the City's MSCP Subarea Plan (City of San Diego 1997a), and are included in Appendix D to the report. The guidelines include the following issue areas: (1) drainage; (2) toxics; (3) lighting; (4) noise; (5) barriers; (6) invasive species; (7) brush management; and (8) grading/land development.

The project is not located within the MHPA, but the drainage improvement project site is located immediately adjacent to the MHPA. For reference, Figures 2 and 3 show the boundary of the MHPA in relation to the drainage improvement site. Although the drainage improvement site appears to overlap into the MHPA, this is not likely as the site is not within the Preserve. This discrepancy is likely a result of mapping artifacts. However, because the project is located near the City's MHPA, the project may need to demonstrate compliance with the MHPA land use adjacency guidelines to address potential indirect effects to the MHPA through features incorporated into the project and/or permit conditions.

Indirect impacts of the proposed project would potentially include temporary construction-related noise, temporary construction-related erosion and sedimentation, permanent human presence, permanent lighting impacts, permanent increase in storm water and nuisance runoff, and the introduction of invasive species. These indirect effects have been evaluated to determine their potential to affect adjacent MHPA resources.

Drainage: The proposed parking lot expansion project is located upslope of a concrete v-ditch and does not drain directly into the MHPA. The drainage improvement project is located directly upstream from a mapped NWI wetland area that is currently a very shallow swale that eventually drains into Los Peñasquitos Creek. During periods of heavy or prolonged rains, the area just upstream from the swale on park property floods into a small pond. This water does not drain directly into the swale and is the impetus for the drainage improvement project.

In general, runoff generated from the proposed project site will eventually drain into the MHPA areas after being collected and appropriately treated on-site. The greatest potential for the discharge of pollutants off-site will occur during the construction phase of the proposed project. Final plans for the proposed project will include a Storm Water Pollution Prevention Plan, with construction and post-construction BMPs to control the discharge of potential pollutants.

The impervious (paved) surface area would increase in the proposed condition; however, through the implementation of the drainage improvement project, the project would provide

significant treatment of the stormwater runoff that is not present in existing conditions. This would result in a beneficial impact of the project by removing potential pollutants within the on-site treatment facilities prior to discharge into the wetlands. As a result, the proposed project would have a less than significant indirect impact on wetland resources.

Toxics: Neither the parking lot expansion nor drainage improvement projects will use toxic chemicals or generate a toxic by-product during their intended uses. The drainage improvement project is intended to help with existing drainage problems. BMPs will also be utilized to keep runoff from leaving the project sites. As a result, the proposed project will be in compliance with MHPA consistency guidelines for toxic substances.

Lighting: Due to the sensitivity of adjacent MHPA resources, exterior lighting has the potential to indirectly affect wildlife in these areas. However, the current land use on the project site is recreational with lights for night-time use. Additionally, adjacent parcels to the north are developed with residences that have exterior lights. Therefore, the MHPA in the canyon currently receives lighting impacts from the project site and its surroundings. The scale and proposed function of the project do not require substantial outdoor lighting. Most of the proposed activities will occur during daylight activities when no lighting would be required. Lighting on the site will be shielded and directed away from the MHPA to avoid lighting impacts. As a result, no significant lighting impacts will occur from the proposed project.

Noise: Due to the relatively small footprints of the two project sites and proposed development type, long-term noise impacts are expected to be minimal and insignificant. Temporary construction noise impacts to nesting birds in the vicinity of the project could be considered significant if construction occurs during the breeding season. If so, mitigation measures may be required. If construction occurs outside of the breeding season, the proposed project would not have a significant noise impact on native birds.

Barriers: The MHPA boundary to the west of the drainage improvement project has an existing wooden-tie fence that separates it from Canyonside Community Park. This fence has several openings built into it to allow public use of the Preserve/MHPA area. If impacted during the construction of either project, the fence will be repaired or replaced to pre-project conditions. As a result, the proposed project will be in compliance with MHPA consistency guidelines for barrier requirements.

Invasives: Developments often include a landscaping component that introduces horticultural species not typically found in natural areas. Some species used for landscaping are known to be invasive and can outcompete native plant species. The landscape plans for the proposed project avoid the use of invasive exotic plant species and use a substantially native plant palette; therefore, this potential indirect impact is considered less than significant.

Brush Management: Neither the drainage improvement or parking lot expansion projects contain residential development. Therefore, neither project will require a brush management plan to be consistent with this MHPA land use adjacency guideline.

Grading/Land Development: Grading will be confined to the limits of work for each site and is not expected to go beyond current boundaries and encroach upon the MHPA.

Nesting Raptors and Songbirds

The proposed project site has the potential to support both raptor and songbird nests due to the presence of trees, shrubs, and other ground cover; however, no active nests were observed during the field assessment. Nesting activity typically occurs from mid-February to mid-August. Disturbing or destroying active nests is a violation of the federal Migratory Bird Treaty Act. In addition, nests and eggs are protected under CFGC Section 3503. The removal of vegetation during the breeding season is considered a potentially significant impact of the proposed project. A mitigating action typically includes conducting any vegetation removal between August 16 and February 14, which is outside the nesting season, to avoid potential impacts to nesting birds. If initial vegetation removal occurs during the nesting season, all suitable habitats will be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected, a buffer of at least 100 feet (300 feet for raptors) will be delineated, flagged, and avoided until the nesting cycle is complete as determined by the biological monitor or wildlife agency personnel have been consulted, to minimize impacts.

CONCLUSION

The proposed project has the potential to directly impact 0.29 acre of Tier II sensitive habitat. If this area is impacted, mitigation of impacts at a ratio of 1.5:1 (outside Preserve) or 1:1 (inside Preserve) will reduce these impacts to less than significant levels. This mitigation may be avoided if the area is avoided; otherwise, mitigation may be satisfied via off-site acquisition of land with equal or greater habitat value; purchase of credits at an approved mitigation bank to offset impacted habitat; active restoration of on- or off-site land to equal or greater habitat value; or via payment of a fee to a fund used to acquire, maintain, and administer the preservation of sensitive resources. The final method of mitigation will require approval from the City of San Diego.

The proposed project also has the potential to indirectly impact the swale adjacent to the drainage improvement project. Implementation of the project itself and installation of appropriate BMPs would reduce the potential impacts due to storm water runoff and pollutants to a level that is less than significant.

If construction occurs outside of the breeding season or recommended avoidance measures are implemented if work occurs during the breeding season, then potentially significant indirect impacts to nesting native birds would be avoided.

If you have questions regarding our findings or this letter report, do not hesitate to call me at (619) 610-7646.

Sincerely,

Sundeep Amin
Senior Biologist

Attachments: Figure 1 – Regional/Vicinity Map
Figure 2 –Sensitive Species Locations and Multi-Habitat Planning Area
Figure 3 – Vegetation Communities and Cover Types
Appendix A – List of Observed Plant Species
Appendix B – List of Observed Wildlife Species
Appendix C – Representative Site Photographs
Appendix D – City of San Diego MSCP Subarea Plan Land Use Adjacency Guidelines (City of San Diego MSCP Subarea Plan – March 1997, Section 1.4.3)

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FIGURES

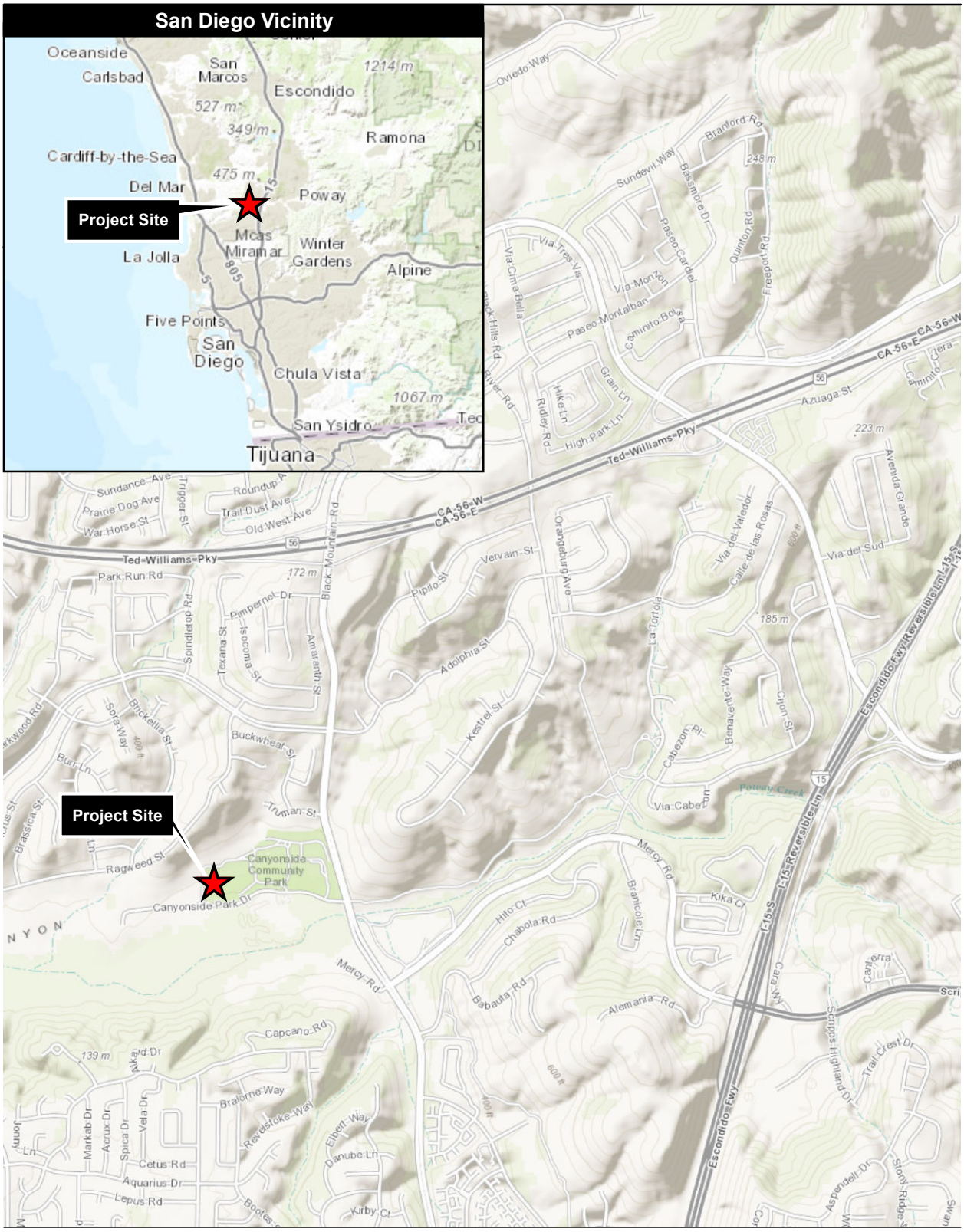
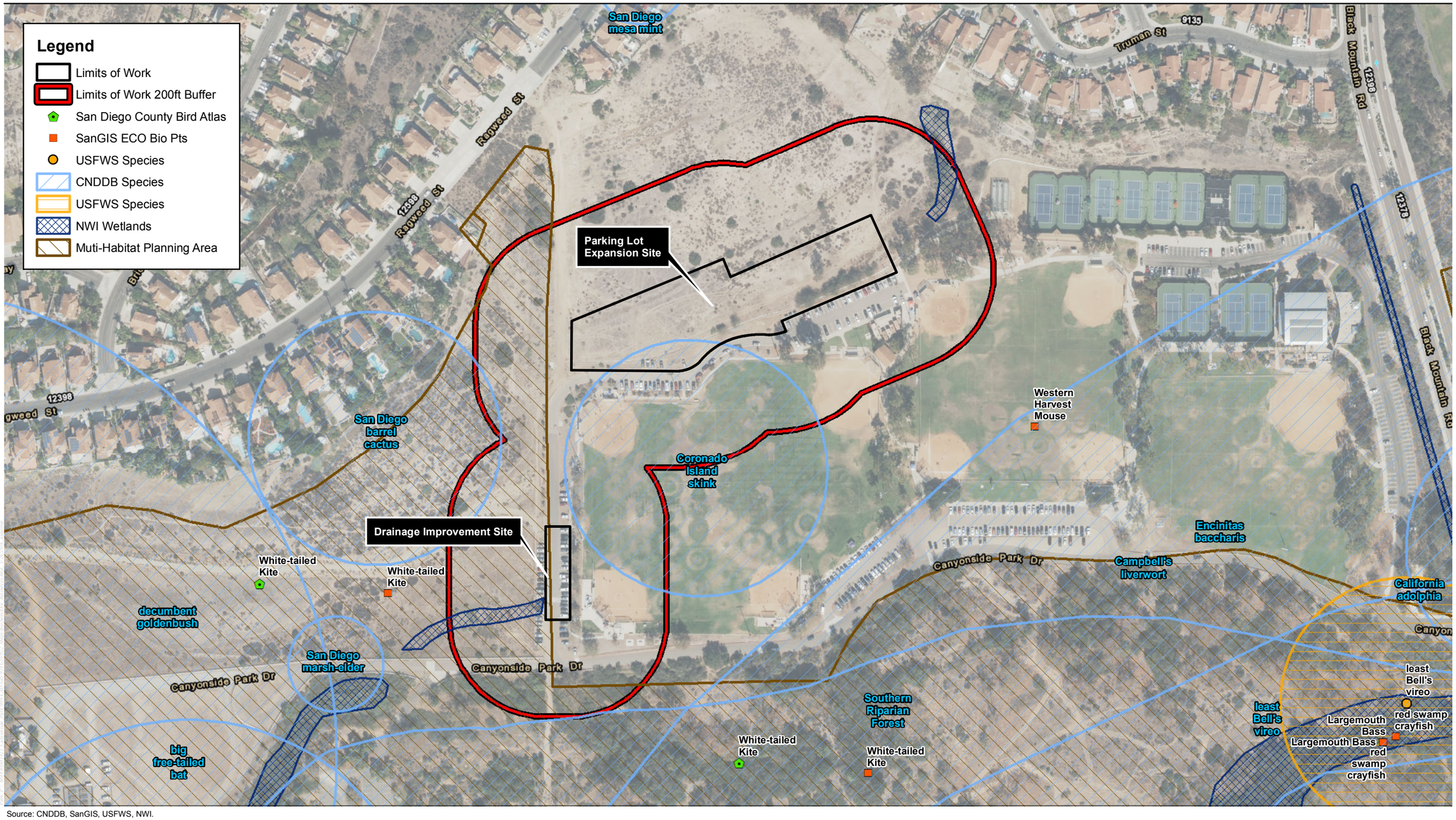


Figure 1
Regional/Vicinity Map

Canyonside Community Park Drainage and Parking Lot Improvements

Path: P:_6048\60481423_Canyonside_Park\900-CAD-GIS\920 GIS\922_Maps\Bio\Regional_Vicinity (2).mxd, 1/8/2016, Paul_Moreno



Source: CNDDB, SanGIS, USFWS, NWI.

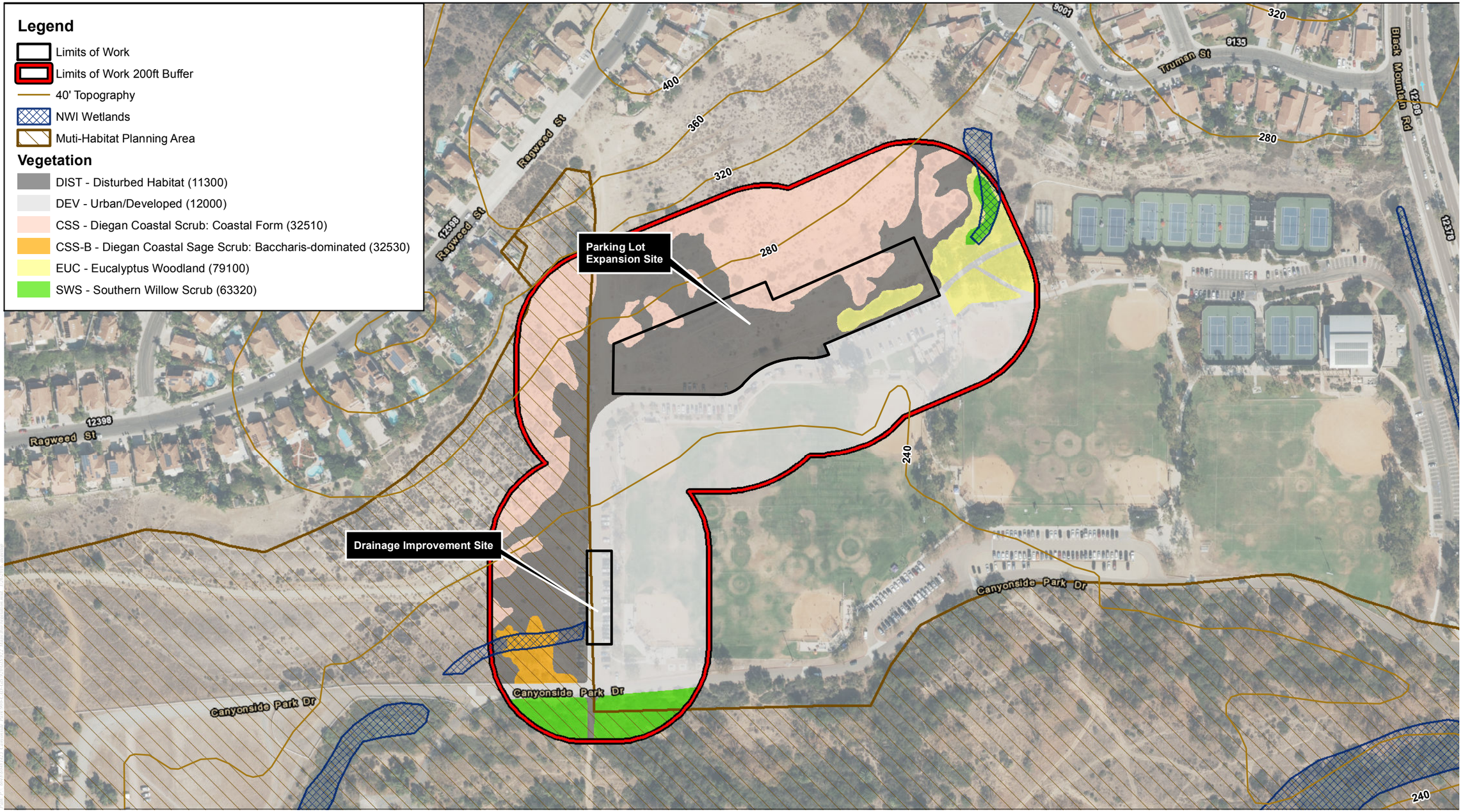
200 100 0 200 Feet

Scale: 1 = 2,400 ; 1 inch = 200 feet

Figure 2
Sensitive Species Locations and Multi-Habitat Planning Area

Canyonside Community Park Drainage and Parking Lot Improvements

Path: P:_6048\60481423_Canyonside_Park\900-CAD-GIS\920 GIS\922_Maps\Bio\Sensitive_Resources.mxd, 1/26/2016, augellop



Source: CNDDB, SanGIS, USFWS, NWI.

200 100 0 200 Feet

Scale: 1 = 2,400 ; 1 inch = 200 feet

Figure 3
Vegetation Communities and Cover Types

Canyonside Community Park Drainage and Parking Lot Improvements

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APPENDIX A

LIST OF OBSERVED PLANT SPECIES

Appendix A
List of Observed Plant Species

Family	Common Name	Scientific Name
Anacardiaceae	laurel sumac	*Malosma laurina*
	lemonadeberry	*Rhus integrifolia*
Apiaceae	sweet fennel	*Foeniculum vulgare**
Asteraceae	broom baccharis	*Baccharis sarothroides*
	California sagebrush	*Artemisia californica*
	cardoon	*Cynara cardunculus**
	coast golden bush	*Isocoma menziesii*
	coyote brush	*Baccharis pilularis*
	Douglas' mugwort	*Artemisia douglasiana*
	mulefat	*Baccharis salicifolia*
	prickly lettuce	*Lactuca serriola**
	spiny sowthistle	*Sonchus asper**
	tocalote	*Centaurea melitensis**
	western ragweed	*Ambrosia psilostachya*
Brassicaceae	black mustard	*Brassica nigra**
	shortpod mustard	*Hirschfeldia incana**
Cactaceae	coast cholla	*Cylindropuntia prolifera*
	coast prickly pear	*Opuntia littoralis*
Chenopodiaceae	Russian thistle	*Salsola tragus**
Cleomaceae	bladder pod	*Peritoma arborea*
Fagaceae	coast live oak	*Quercus agrifolia*
Geraniaceae	redstem filaree	*Erodium cicutarium**
	storksbill	*Erodium botrys**
Myrtaceae	gum tree	*Eucalyptus* sp.*
Platanaceae	western sycamore	*Platanus racemosa*
Poaceae	perennial ryegrass	*Festuca perennis**
	purple needlegrass	*Stipa pulchra*
	red brome	*Bromus madritensis**
Polygonaceae	California buckwheat	*Eriogonum fasciculatum*
	curly dock	*Rumex crispus**
Rosaceae	California rose	*Rosa californica*
Salicaceae	Fremont's cottonwood	*Populus fremontii*
	arroyo willow	*Salix lasiolepis*
Solanaceae	Jimsonweed	*Datura wrightii*
	tree tobacco	*Nicotiana glauca**

** denotes nonnative species*

APPENDIX B

LIST OF OBSERVED WILDLIFE SPECIES

Appendix B
List of Observed Wildlife Species

Common Name	Scientific Name
Birds	
Anna's hummingbird	*Calypte anna*
American crow	*Corvus brachyrhynchos*
Bushtit	*Psaltriparus minimus*
California towhee	*Melozone crissalis*
Common raven	*Corvus corax*
House finch	*Haemorhous mexicanus*
Mourning dove	*Zenaida macroura*
Northern mockingbird	*Mimus polyglottos*
Red-tailed hawk	*Buteo jamaicencis*
Say's phoebe	*Sayornis saya*
Spotted towhee	*Pipilo maculatus*
Western scrub jay	*Aphelocoma californica*
White-crowned sparrow	*Zonotrichia leucophyrs*
Reptiles	
Side-blotched lizard	*Uta stansburiana*
Mammals	
Desert cottontail rabbit	*Sylvilagus audubonii*

APPENDIX C

REPRESENTATIVE SITE PHOTOGRAPHS

Photo 1. Parking Lot Expansion Site – Westerly view from eastern edge of site, looking at eucalyptus woodland at left, disturbed habitat in center and coastal sage scrub to top right of photo.

Photo 2. Parking Lot Expansion Site – View of the disturbed/coastal sage scrub boundary. Note the sparse density of the coastal sage scrub.

Photo 3. Parking Lot Expansion Site – View from approximate center of site looking west at the disturbed part of the site, with the existing parking lot to the left and native vegetation in the top right (arrow).

Photo 4. Parking Lot Expansion Site – View from SW corner of site, looking towards NE end. Dead Russian thistle is visible here in the disturbed part of the site with some greener native vegetation in the back (arrow).

Photo 5. Drainage Improvement Site – View of drainage improvement area from east to west into the Preserve/MHPA area, just beyond the wooden fence.

Photo 6. Drainage Improvement Site – View of swale feature west of project site. Swale is distinguishable by the slightly greener vegetation and trail of taller vegetation in the center of the photo (arrow).

APPENDIX D

CITY OF SAN DIEGO MSCP SUBAREA PLAN
LAND USE ADJACENCY GUIDELINES

3. No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.

1.4.3 Land Use Adjacency Guidelines

Land uses planned or existing adjacent to the MHPA include single and multiple family residential, active recreation, commercial, industrial, agricultural, landfills, and extractive uses. Land uses adjacent to the MHPA will be managed to ensure minimal impacts to the MHPA. Consideration will be given to good planning principles in relation to adjacent land uses as described below. The following are adjacency guidelines that will be addressed, on a project-by-project basis, during either the planning (new development) or management (new and existing development) stages to minimize impacts and maintain the function of the MHPA. Implementation of these guidelines is addressed further in **Section 1.5**, Framework Management Plan. Many of these issues will be identified and addressed through the CEQA Process.

Drainage

1. 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. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxics

2. Land uses, such as recreation and agriculture, that use chemicals or generate by-products 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. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

Lighting

3. 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.

Noise

4. 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 also be incorporated for the remainder of the year.

Barriers

5. 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.

Invasives

6. No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Brush Management

7. 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. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

For existing project and approved projects, the brush management zones, standards and locations, and clearing techniques will not change from those required under existing regulations.

Grading/Land Development

8. Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

1.5 FRAMEWORK MANAGEMENT PLAN

1.5.1 Management Goals and Objectives

The habitat management aspect of the City of San Diego's MHPA is an important component of the MSCP, related to the goal of the Program. The overarching MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region.

Where land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to continue to ensure that the biological values are maintained over time, and that the species and habitats that have been set aside are adequately protected and remain viable.

The City will be responsible for and will continue the management and maintenance of its existing public lands (including those with conservation easement), at current levels. The City will also manage and maintain lands obtained as mitigation where those lands have been dedicated to the City in fee title or easement, and land acquired with regional funds within the City's MHPA boundaries. Likewise, the federal and state agencies will manage, maintain and monitor their present land holdings, as well as those they acquire on behalf of the MSCP, consistent with the MSCP. Lands in the MHPA which are set aside as open space through the development process but are not dedicated in fee to the City, or other acceptable entity, will be managed by the landowner consistent with approved mitigation, monitoring and reporting programs or permit conditions. Private owners of land within the MHPA, who are not third party beneficiaries, will have no additional obligations for the management or maintenance of their land.

In order to assure that the goal of the MHPA is attained and fulfilled, management objectives for the City of San Diego MHPA are as follows:

1. To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.

The City of SAN DIEGO

Public Works Department
Preliminary Engineering

June 12, 2018

Mr. Patrick Gower, Fish and Wildlife Biologist
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, CA 92008

Subject: Summary of the Field Survey for thread-leaved brodiaea (*Brodiaea filifolia*) for, the the Canyonside Community Park Drainage and Parking Lot Improvements Project [PTS 368898] in City of San Diego, California.

Dear Mr. Gower:

The purpose of this letter report is to present the findings of the thread-leaved brodiaea survey conducted for the Canyonside Community Park Drainage and Parking Lot Improvement Project (project) conducted May 10, 2018.

Project Description

The proposed project is located in the existing Canyonside Community Park at 1235 Black Mountain Road, San Diego, California. The site is specifically located on the northwest corner of the intersection of Black Mountain Road and Canyonside Park Drive in the community of Rancho Peñasquitos within the City of San Diego, California. The proposed project would improve the drainage of an existing dirt parking lot, construct a new tot-lot play area, and construct an expanded overflow parking area. This survey covers the drainage improvement areas and expanded parking lot.

The drainage improvement project limit of work is rectangular in shape and covers 0.22 acre. This project overlaps a concrete/asphalt and dirt parking lot at the western edge of the park, bordering Los Peñasquitos Canyon Preserve. The parking lot expansion project covers 2.24 acres and is located on the northwest edge of the park, north of an existing parking lot. For the purposes of this survey, only the area north of the existing parking lot was surveyed.

Vegetation Communities

The majority of the parking lot expansion footprint is characterized by disturbed habitat, along with smaller areas of eucalyptus woodland and coastal sage scrub.

Disturbed Diegan Coastal Sage Scrub

525 B Street Suite 750, MS 908A
San Diego, CA 92101

T (619) 533-4107
sandiego.gov

The parking lot expansion site contains 0.29 acre of coastal sage scrub. Dominant species present in this vegetation community on-site include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and laurel sumac (*Malosma laurina*). Other native and nonnative species are also present. Due to the proximity of this community to the disturbed habitat within the survey area, this coastal sage scrub quality is low, with a sparse density of native shrubs and moderate percentage of nonnative grasses and herbs.

Eucalyptus woodland (79100)

Eucalyptus woodland occurs at the northeast portion of the survey area, with a small portion (0.14 acre) occurring within the parking lot expansion site footprint.

Disturbed Habitat (11300)

The majority of the parking lot expansion is made up of disturbed habitat. Approximately 1.81 acres of disturbed habitat is present within the parking lot expansion site footprint and consist of approximately 80 percent cover of nonnative grasses and annual species including red brome (*Bromus madritensis* subsp. *rubens*), ripgut brome (*Bromus diandrus*), wild oat (*Avena* sp.), shortpod mustard (*Hirschfeldia incana*), Russian thistle (*Salsola tragus*), filaree (*Erodium* sp.) and tocalote (*Centaurea melatensis*).

Results

A review of the CNDDB for nearby/historical occurrences showed the nearest known population occurs 2 miles away near Mount Carmel High School (Sundevil Way and Carmel Mountain Road). Three known population occur within 5 miles, all occurring within Black Mountain.

Prior to conducting the project specific survey on May 10, 2018, a reference site was visited (Heritage Bluffs) to determine the current stage of flowering. A few individuals were observed flowering, but the majority were past the flowering stage and began to die-back. Some basal leaf vegetation was visible.

The USDA soil map was reviewed for both the reference site and the project site. Soils at the reference site are primarily Altamont clay. Soils at the project site include Huerhuero loam and Olivenhain cobbly loam. There was a visible difference between the soils at the reference site and at the project site.

City of San Diego Biologists Rebecca Alvidrez and Sean Paver conducted surveys for thread-leaved brodiaea within the project site on May 10, 2018 between 11am and 2:30pm. The entire project area was surveyed by walking transects, spaced approximately 5-meters apart. No thread-leaved brodiaea was observed within the project area. Based on known CNDDB occurrences, USDA soil information, and the recent survey, it is unlikely that thread-leaf brodiaea would occur within this project site.

If you have any questions regarding this submittal you may reach me at (619) 533-4107 or by email at ralvidrez@sandiego.gov.

Sincerely,

Rebecca Alvidrez
Biologist III

cc: Kristen Foreburger, Senior Planner, Planning Department-Multiple Species Conservation Program (MSCP)
Mark Brunette, Senior Planner, Development Services Department
Sean Paver, Senior Planner, Public Works Department – PI Division
Jessica Madamba, Associate Planner, Development Services Department
Golsa Soraya, Development Project Manager, Development Services Department