May 29, 2009
Project No. 105338056

Ms. Linda J. Clark
Senior Project Manager/Environmental Coordinator
Facilities Management
San Diego Unified School District
4860 Ruffner Street
San Diego, California 92111

Subject: Site Reconnaissance and Biological Survey
Camp Elliott #3 Site
San Diego, California

Reference: Helix Environmental Planning, Inc., 200, Biological Constraints Analysis of the SDUSD Camp Elliot #3 Site: dated May 13.

Dear Ms. Clark:

In accordance with our proposal, dated March 11, 2009, we have prepared this letter summarizing the site reconnaissance and biological survey performed at the Camp Elliot #3 property (site). The site is located on the north side of Calle De Vida, approximately 0.10-mile southeast of Rueda Drive (Figure 1). The site consists primarily of undeveloped land with several dirt roads and trails that cross the site and numerous piles of concrete debris scattered mainly in the northern half of the site (Figure 2). Reportedly the area is currently being utilized by the neighboring community as a shortcut to nearby hiking/walking trails in the Mission Trails Regional Park.

It is our understanding that concrete debris has been illegally dumped at the site for the last approximately 20 years. San Diego Unified School District (SDUSD) is proposing to remove the concrete debris based on requests from a community member that utilizes the walking trails on and adjacent to the site. In addition, photographs of the site provided by the SDUSD indicate possible asbestos containing debris may have been dumped at the site (Attachment A). The purpose of the work was to evaluate the potential biological constraints associated with the removal of the concrete debris and to perform a site reconnaissance to map possible asbestos containing debris or other hazardous materials/wastes that may have been dumped at the site.

On April 16, 2009, Mr. Nicholas Carpenter, a State of California Certified Site Surveillance Technician, performed a site reconnaissance to identify and map potential asbestos containing debris at the site. In the northern central portion of the site, an approximately 3-4 foot length of broken transite pipe, a suspect asbestos containing material (ACM), and several smaller pieces of transite pipe were observed. The pipe corresponded with suspect ACMs that were previously identified in site photographs. SDUSD was notified of the type and location of the suspect ACM and subsequently removed and disposed of the suspect ACM in accordance with applicable local, state, and federal regulations. No other suspect ACMs or hazardous materials/wastes were observed on site at the time of the site reconnaissance.

On April 2, 2009, a biologist from Helix Environmental Planning, Inc. (Helix) conducted a site reconnaissance to note the general biological conditions, assess the potential for the occurrence of sensitive species and habitats, and to assess the potential biological constraints associated with SDUSD's plans to remove the concrete debris at the site. Helix summarized their site reconnaissance, findings, and recommendations in the above-referenced letter report titled "Biological Constraints Analysis of the SDUSD Camp Elliot #3 Site" (Attachment B). The following provides a summary of the findings of the Helix report:

- The site is located within the City of San Diego's Multiple Species Conservation Program (MSCP) area and is adjacent to a City of San Diego Multi-Habitat Planning Area (MHPA).
- Federally and state listed plant species were not observed on site; however, one regionally sensitive plant species was observed on site (San Diego sunflower) and two vegetation communities considered sensitive by the City of San Diego were noted on site (Diegan coastal sage scrub and non-native grassland).
- One federally listed threatened animal species (coastal California gnatcatcher) was observed adjacent to the site within the MHPA area. In addition, suitable nesting habitat for the coastal California gnatcatcher was observed adjacent to and on the site. One regionally sensitive animal species (mule deer) was observed utilizing the site.
- Although the federal Migratory Bird Treaty Act (MBTA) is generally protective of migratory birds, it does not specify the type of protection required. However, Helix reports that it is common practice to use the MBTA to place restrictions on disturbance of active bird's nests during the nesting season, generally February 1 through July 30.

The following provides a summary of the recommendations of the Helix report:

- Since the site is located adjacent to the MHPA, the MHPA Land Use Adjacency Guidelines, as provided in the City of San Diego MSCP Subarea Plan are applicable (Attachment C).

- In accordance with the MSCP Subarea Plan, impacts to sensitive vegetation communities would require mitigation; however, Helix states that following "proper avoidance practices during concrete removal would prevent impacts to sensitive vegetation and subsequent mitigation requirements."

    - The staging of equipment and supplies, if necessary, should not be in areas of existing vegetation, but in disturbed habitat areas (i.e., dirt roads and trails) or developed land (i.e., gravel haul road or paved areas).

    - Tracked vehicles/machinery should not be utilized on the site. Vehicles/machinery utilized on the site should use the "smallest possible" rubber tires.

    - The majority of driving on the site should be confined to the three dirt roads/trails on the site (i.e., southeastern gravel road, northeastern dirt road, and south-to-west trending dirt road). If loaders are utilized, the loader should drive straight into concrete piles and back out with out turning in grassy areas to minimize soil disturbance.

    - Hand loading of concrete debris into loader buckets, or similar, should be performed whenever possible. However, large pieces of debris may require the use of "unacceptably large machinery" to be removed. Therefore, large pieces of debris should be broken into smaller pieces suitable for hand-loading utilizing a jackhammer.

    - The removal of shrubs should be avoided and grading and grubbing should not take place. If shrubs are growing on mounds above concrete, concrete should be removed to the point where it is no longer visible without removing the shrub. If shrub removal is required, "it is better to crush the shrub and keep the root system intact, [than] to push the plant over, risking damage to the roots."

- Noise issues adjacent to the MHPA are to be managed to ensure minimal impacts to sensitive species within the MHPA. The noise generated during concrete removal or breaking activities may result in a temporary indirect impact to nearby nesting birds; therefore, these activities should be prohibited during the breeding season, which is from March 1 to August 15.

- Concrete removal activities should not take place during the rainy season; however, if work is required during the rainy season, vehicles/machinery should not leave roads/trails when the soil is saturated.

- A species-specific plant survey may be required by the City of San Diego; however, surveys may not be required if there will not be permanent impacts on site.

- If concrete removal activities need to take place during the breeding season, a nesting bird survey would be required to document that birds are not nesting in the area.

Ninyo & Moore concurs with the recommendations stated in the Helix report and recommends the following:

- Prior to concrete debris removal activities at the site, SDUSD should submit a letter to the City of San Diego's MSCP for review and approval with the Helix report provided as an attachment that outlines the plans and procedures for concrete debris removal at the site.

We appreciate the opportunity to be of service.

Respectfully submitted,
NINYO & MOORE

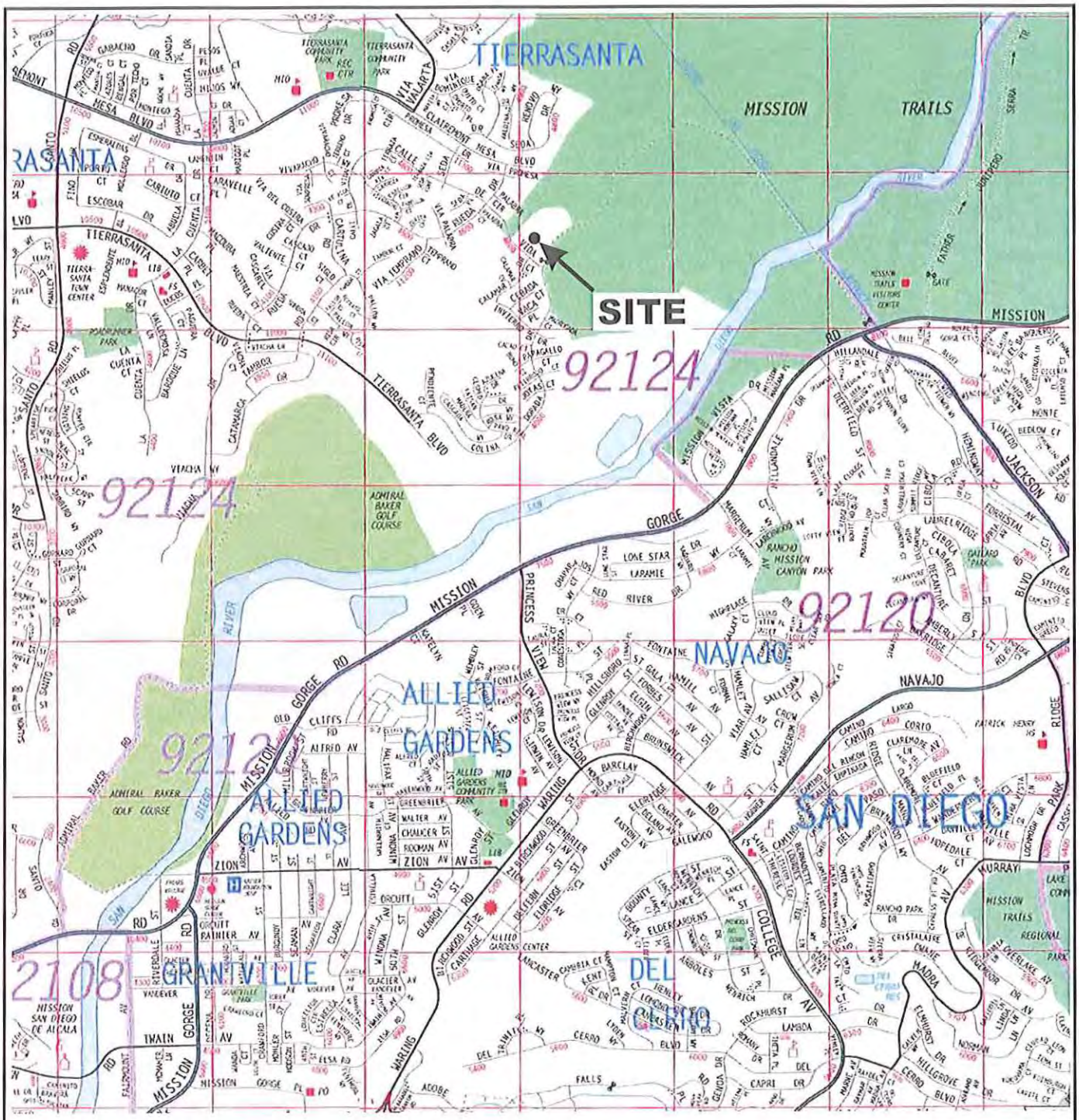
Lisa Hill, R.E.A.
Senior Project Environmental Scientist

Beth S. Abramson-Beck, P.G. 4580
Principal Geologist

LH/BAB/gg

Attachments: Figure 1 – Site Location Map
Figure 2 – Site Plan
Attachment A – SDUSD Site Photographs
Attachment B – Helix Letter Report, May 13, 2009
Attachment C – San Diego MSCP Subarea Plan, MHPA Land Use Adjacency Guidelines

Distribution: (1) Addressee



REFERENCE: 2005 THOMAS GUIDE FOR SAN DIEGO COUNTY, STREET GUIDE AND DIRECTORY.

APPROXIMATE SCALE

0 2400 4800 FEET

N

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

fig 1 105338056 slm

Ninyo & Moore	SITE LOCATION MAP	FIGURE
PROJECT NO.	DATE	CAMP ELLIOT #3 SAN DIEGO, CALIFORNIA	1
105338056	5/09		

APPROXIMATE SCALE

0 200 400 FEET

LEGEND	
	SITE BOUNDARY

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

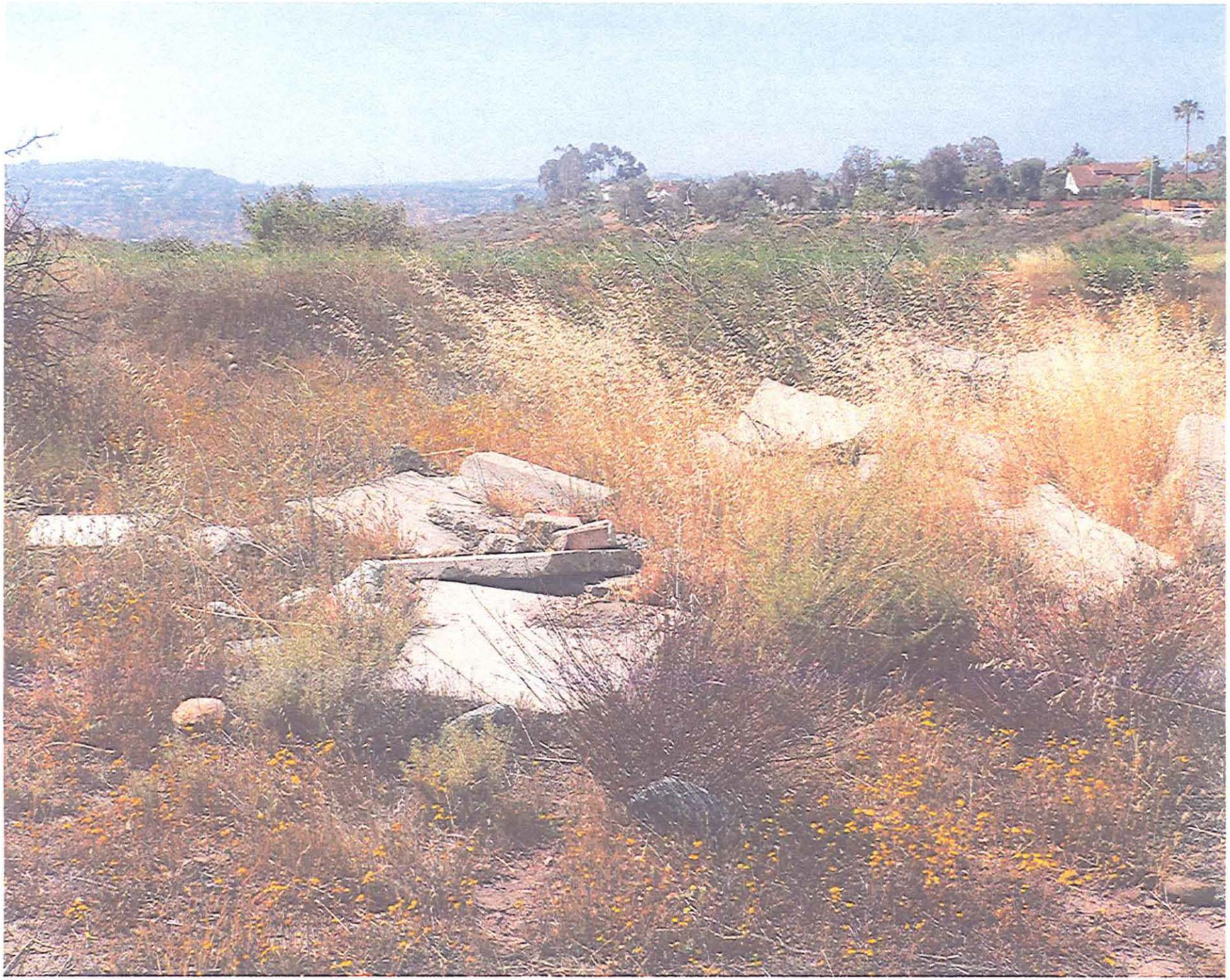
REFERENCE: GOOGLE EARTH, 2009.

Ninyo & Moore	SITE PLAN	FIGURE
PROJECT NO. 105338056 / DATE 5/09	CAMP ELLIOT #3 SAN DIEGO, CALIFORNIA	2

fig 2 105338056 site

ATTACHMENT A

SDUSD SITE PHOTOGRAPHS



ATTACHMENT B

HELIX LETTER REPORT, MAY 13, 2009

HELIX environmental planning, inc.

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May 13, 2009 NIN-01

Lisa A. Hill
Ninyo & Moore
5710 Ruffin Road
San Diego, California 92123

Subject: Biological Constraints Analysis of the SDUSD Camp Elliot #3 Site

Dear Ms. Hill:

This letter reports the results of a biological reconnaissance conducted by HELIX Environmental Planning, Inc. (HELIX) for the approximately 13.5-acre San Diego Unified School District (SDUSD) Camp Elliot #3 site and assesses the biological constraints and recommendations associated with the proposed removal of concrete debris from the site.

INTRODUCTION

The project site (Assessor's Parcel Number 373-030-03-00) is located in the Tierrasanta community of the City of San Diego (City), California, east of Interstate 15, south of State Route 56, at the intersection of Calle de Vida and Colina Dorada Dr. The site is situated in Township 15 South, Range 2 West on the U.S. Geological Survey La Mesa 7.5-minute quadrangle map. The project site is located within the Multiple Species Conservation Program (MSCP) and is adjacent to, but outside of, the Multi-Habitat Preserve Area (MHPA) boundaries.

Physically, the site is gently sloping to the southwest at approximately 520 to 560 feet above mean sea level. The site is undeveloped and consists primarily of non-native grassland and Diegan coastal sage scrub. Surrounding land uses include residential development and MHPA open space.

Redding gravelly loam, 2 to 9 percent slopes, is the mapped onsite soil type (Bowman 1973).

METHODS

Prior to the field investigation, HELIX reviewed existing biological documents and conducted an in-house database search for sensitive biological resources and species known to occur within the project vicinity.

HELIX biologist Dale Ritenour conducted a site reconnaissance on April 2, 2009, the purpose of which was to note the general biological conditions on site, to assess the potential for sensitive species and habitats to occur, and to assess potential biological constraints associated with the proposed removal of concrete

debris from the site. Vegetation was mapped on site with the aid of a 1"=200' scale aerial photograph. Sensitive plant and animal species observed were also noted.

No focused plant or animal species surveys or jurisdictional delineation fieldwork were conducted. Results of this report are based on a site reconnaissance. Additional surveys may be needed during the appropriate time of year.

Nomenclature for this report is taken from Oberbauer (2008) for vegetation communities. Plants were identified according to The Jepson Manual: Higher Plants of California (Hickman, ed. 1993) and named according to The Checklist of the Vascular Plants of San Diego County (Rebman 2006). Nomenclature follows Baker et. al. (2002) for mammals, the American Ornithologists' Union (2007) for birds, and Collins and Taggart (2002) for reptiles.

EXISTING CONDITIONS

Concrete debris exists in dozens of piles onsite, which detract visually from the condition of this site, particularly as this site provides access to Mission Trails regional park. Almost all of concrete debris onsite is located in non-native grasslands or in grassy openings in disturbed Diegan coastal sage scrub that could be reached with minimal disturbance of shrubs.

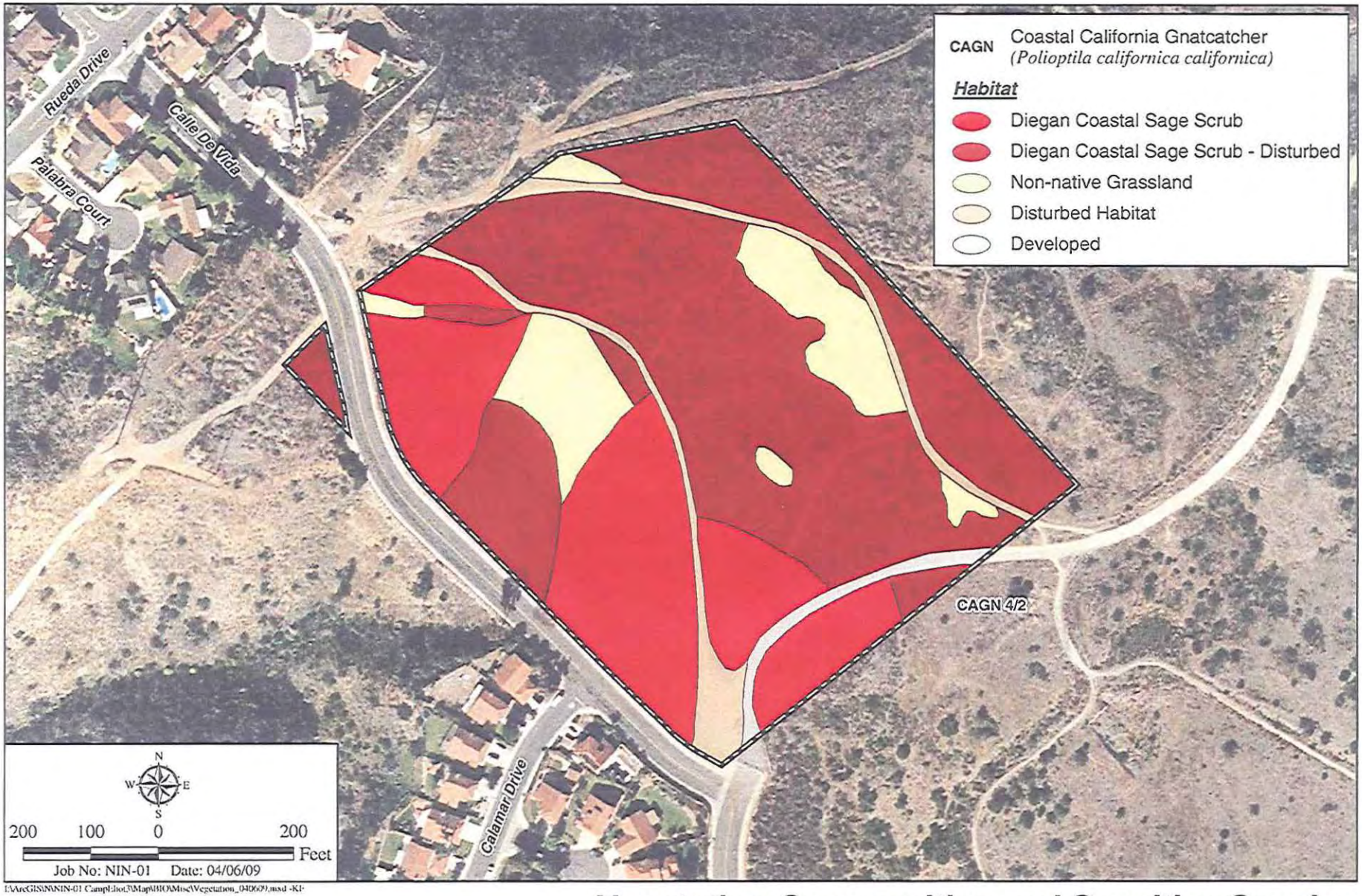
Vegetation Communities

Four vegetation communities/habitats were identified on site: Diegan coastal sage scrub (including disturbed), non-native grassland, disturbed habitat, and developed land (Figure 1; Table 1). Diegan coastal sage scrub (including disturbed) and non-native grassland are considered sensitive by the City of San Diego.

Table 1
EXISTING VEGETATION COMMUNITIES

VEGETATION COMMUNITY*	MSCP TIER	ACRE†
Diegan coastal sage scrub	II	10.9
Non-native grassland	IIIB	2.6
Disturbed Habitat	IV	0.8
Developed	IV	0.2
	TOTAL	13.5

*Community names are from Oberbauer (2008)
†Rounded to the nearest 0.1



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Vegetation Communities and Sensitive Species

SDUSD - CAMP ELIOT #3

HELIX

Diegan Coastal Sage Scrub

Coastal sage scrub is one of the two major shrub types that occur in southern California, occupying xeric sites characterized by shallow soils (the other is chaparral). Four distinct coastal sage scrub geographical associations (northern, central, Venturan, and Diegan) are recognized along the California coast. Despite the fact that it has been greatly reduced from its historical distribution (Oberbauer 1991), the Diegan association is the dominant coastal sage scrub in coastal Southern California from Los Angeles to Baja California, Mexico (Holland 1986).

Diegan coastal sage scrub is dominated by shrubs with leaves that abscise during drought and are replaced by a lesser amount of smaller leaves. This adaptation of drought evasion allows these species to better withstand the prolonged drought period in the summer and fall in areas of low precipitation.

Diegan coastal sage scrub may be dominated by a variety of species depending upon geographical location, soil type, slope, and aspect. Typical species found within Diegan coastal sage scrub include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum* ssp. *fasciculatum*), laurel sumac (*Malosma laurina*), and black sage (*Salvia mellifera*).

Diegan coastal sage scrub (including disturbed) is considered a sensitive habitat by the City, U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Game (CDFG), and is given the highest inventory priority in the California Natural Diversity Database (CNDDB). This habitat type supports a number of federally and state endangered, threatened, and rare plants as well as several bird, reptile, and insect species that are federally listed or are candidates for federal listing, including the coastal California gnatcatcher (*Polioptila californica californica*).

California sagebrush is the dominant plant species in Diegan coastal sage scrub within the project site. Approximately 3.9 acres of Diegan coastal sage scrub occur within the project site.

The disturbed Diegan coastal sage scrub onsite has obvious evidence of clearing or fill of soils, and has a developing shrub cover mixed with Mediterranean weeds. This community is dominated by natives including deerweed (*Lotus scoparius*), California buckwheat, and goldenbush (*Isocoma menziesii*), and non-native species such as rattail fescue (*Vulpia myuros*) and Indian sweetclover (*Melilotus indicus*). Approximately 7.0 acres of disturbed Diegan coastal sage scrub occur within the project site.

Non-native Grassland

Non-native grassland is characterized by a dense to sparse cover of exotic annual grasses and is often associated with numerous species of showy-flowered native annual forbs (Holland 1986). Characteristic species include wild oats (*Avena* sp.), red brome (*Bromus madritensis* ssp. *rubens*), ripgut brome (*B. diandrus*), ryegrass (*Lolium multiflorum*), and mustard (*Brassica* sp.). Most of the annual introduced species that comprise the majority of species and biomass within the non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. Although not as sensitive as native habitats, non-native grasslands can support many of the same plant and animal species. Non-native grasslands are also valuable as foraging habitat for sensitive raptor species.

Non-native grassland covers approximately 1.6 acres of the project site and is dominated by black mustard (*Brassica nigra*) and red brome. Other prominent species within this habitat onsite include ripgut brome, long-beak filaree (*Erodium bothrys*), and rattail fescue.

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes any capability of providing viable habitat.

Disturbed habitat onsite is in the form of dirt roads, and is primarily devoid of vegetation. Plant species present within this community include red-stem filaree (*Erodium cicutarium*), black mustard, and common pineapple-weed (*Matricaria matricarioides*). Disturbed habitat totals approximately 0.8 acre within the project site.

Developed Land

Developed land is that where permanent structures and/or pavement has been placed, preventing vegetation growth. On site, developed land covers approximately 0.2 acre and consists of a gravel haul road along the eastern boundary of the site.

Jurisdictional Areas

No U.S. Army Corps of Engineers (Corps) or CDFG jurisdictional areas occur on site, as the site lacks drainages and streambeds. As a result, no Clean Water Act Section 401 and 404 permits or CDFG Code Section 1602 Streambed Alteration Agreement would be required.

Sensitive Plants and Animals

Fifty (50) plant species were observed within the project site (Attachment A). Twenty-six (26) animal species were detected, including 16 bird, 4 mammal, 2 reptile, and 4 butterfly species (Attachment B).

One federally listed threatened animal species (coastal California gnatcatcher) was observed adjacent to the project site, within the MHPA. One other regionally sensitive animal species (mule deer [*Odocoileus hemionus*]) was observed using the site.

No federally or state listed species were observed onsite. One regionally sensitive plant species was observed onsite (San Diego sunflower [*Viguera lacinata*]).

GENERAL RESOURCE REGULATIONS

Regulations that could apply to the site include the federal and state Endangered Species Acts (ESAs) and California Environmental Quality Act (CEQA). The USFWS takes jurisdiction over threatened or endangered species under the federal ESA. Mitigation for potentially significant impacts is also required pursuant to CEQA for impacts to biological as well as other resources covered by the Act.

Multiple Species Conservation Program

In July 1997, the USFWS, CDFG, and City adopted the MSCP Implementing Agreement (City 1997b), which allows incidental take of threatened and endangered species as well as other sensitive species conserved by the MSCP (covered species). The City's MSCP covers 85 plant and animal species, 15 of which are also listed as Narrow Endemic species that have restricted geographic distributions, soil affinities, and/or habitats. Under the MSCP, impacts to Narrow Endemic Species are to be avoided to the maximum extent practicable.

The MSCP designates regional preserves (MHPA) that are intended to be mostly void of development activities while allowing development of other areas subject to program requirements. A portion of the site is located adjacent to the MHPA; therefore, the MHPA Land Use Adjacency Guidelines (City 2001a) are applicable. Noise issues adjacent to the MHPA are to be managed to ensure minimal impacts to sensitive species within the MHPA.

Migratory Bird Treaty Act

All migratory bird species native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection

required. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season (generally February 1 to July 30). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests in the spring and summer. If activities had to occur during the breeding season, a nesting bird survey would be required to ensure that no birds are nesting within the removal areas.

BIOLOGICAL CONSTRAINTS

Sensitive Vegetation Communities/Habitats

Two sensitive vegetation community/habitats occur on site: Diegan coastal sage scrub (including disturbed) and non-native grassland. Impacts to sensitive vegetation communities would require mitigation per the City MSCP subarea plan. Following proper avoidance practices during concrete removal would prevent impacts to sensitive vegetation and subsequent mitigation requirements.

Sensitive Plant and Animal Species

Coastal California gnatcatchers were observed adjacent to the site in the MHPA, and suitable habitat exists for nesting, both on and off site. Activities that could cause sensitive bird species to be displaced from their nests or fail to breed would be prohibited during the breeding season. Noise from equipment necessary to remove concrete could result in a temporary indirect impact to nearby nesting avian species. To avoid indirect noise impacts on nesting coastal California gnatcatchers, removal activities should be conducted outside of the breeding season, which is from March 1 to August 15.

It is unlikely that listed plant species would occur in or immediately adjacent to the concrete piles, because of the heavy disturbance in these areas. The presence of any federal or state listed plant species on site could pose a constraint to concrete removal. Species-specific plant surveys could be required by the City. Rare plant surveys typically consist of two surveys in the spring (April to June). Surveys may not be necessary if there are no permanent impacts on site.

This site is outside of the USFWS 2009 survey area for Qunio checkerspot butterflies, therefore the USFWS assumes the absence of this species, and protocol surveys would not be required for any activities on this site.

Other species-specific animal surveys likely would not be required as appropriate habitat for other federally and state listed animal species does not occur on site.

CONCRETE REMOVAL RECOMMENDATIONS

This section provides recommendations on conducting concrete removal from this site, while avoiding significant impacts to native habitat and species, and preventing the disturbance of soils.

Staging area

The staging area for any work onsite should be in disturbed habitat, such as the dirt area in the southern corner. No materials or machinery associated with concrete removal should be staged in any sort of existing vegetation, including non-native grasses. Care should need to be taken by machinery operators to avoid placing anything on or against shrubs.

Machinery

The choice of machinery for this site is limited by the goal of reducing impacts to soils and shrubs. No tracked vehicles should be used on this site. The smallest possible rubber-tired loaders and trucks should be used in any given circumstance. Jackhammers would be necessary to break up the largest sections of concrete. Vehicle mounted jackhammers would be permissible on small rubber-tired machinery (skip loaders, etc.).

Access

The site has three roads across it that would serve as good access routes: the southeastern gravel road (developed habitat on vegetation map), the northeastern dirt road (disturbed habitat), and the narrower south-to-west dirt road. The majority of driving should be restricted to these access routes. To access the concrete piles, machinery should traverse grassy openings in non-native grassland or Diegan coastal sage scrub. Non-native grasses would not be permanently impacted by rubber-tired vehicles and would recover quickly.

Loaders should drive straight in to concrete piles and back out, not turning around in grassy areas, in order to minimize soil disturbance.

Removal

The smaller chunks of concrete should be loaded by hand into the buckets of small loaders and driven to the staging area. Hand loading the buckets whenever possible would reduce the disturbance of soils. There are very large pieces of concrete onsite that would require the use of unacceptably large machinery to remove. These pieces should be broken up with a jackhammer (or similar machinery) before removal, and then loaded by hand into rubber-tired loaders.

Most of the concrete piles do not have shrubs growing on them, though a few have shrubs immediately next to them. In the few cases where shrubs are growing on mounds above concrete, the goal should be to remove concrete to the point where concrete is no longer visible, and not remove any shrubs.

If any shrubs absolutely must be impacted to remove concrete, it is better to crush the shrub and keep the root system intact, that to push the plant over, risking damage to the roots. No grading or grubbing should occur, to help ensure that activities are temporary and that no long term effects to sensitive habitats occur.

Monitoring

The City may require that a biologist be present during removal activities, to advise and oversee the contractor in avoiding sensitive habitat and species.

Timing

Concrete removal should occur outside of the coastal California gnatcatcher breeding season (March 1 – August 15). Preferably, work would occur during the fall, outside of the rainy season. If work occurs during the rainy season, loaders should not leave roads when soil is saturated and unable to support the weight of vehicles without deforming.

CONCLUSION

The scope of HELIX's analysis is the preliminary evaluation of potential issues related to biological resources that could have a significant effect on the ability to conduct work on the site. Based on HELIX's preliminary review, it appears that with proper avoidance measures, no significant impact would occur to native habitats or sensitive species. If direct impacts to sensitive resources are avoided (no grading, grubbing, etc.) then there may be no need for discretionary review by the City. This would need to be confirmed by City staff.

If you decide to move forward with work on this site, HELIX can assist you with City coordination and biological monitoring of removal activities, as required.

Please call me or Greg Mason at 619-462-1515 if you have any questions regarding this report.

Sincerely,

Dale Ritenour
Biologist

Enclosures: Figure 1 Vegetation Communities and Sensitive Species Map
Attachment A Plant Species Observed
Attachment B Animal Species Observed

REFERENCES

American Ornithologists' Union (AOU). 2007. List of the 2,046 Bird Species (with Scientific and English Names) Known from the AOU Check-list Area. URL: http://www.aou.org/checklist/index.php3.

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2001a. Land Development Code Biology Guidelines (as amended by Resolution R-294943). May 19.

2001b. Planning and Development Review Department, Environmental Analysis Section, Significance Determination Guidelines under CEQA. Revised April.

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Holland R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Nongame-Heritage Program, State of California, Department of Fish and Game, Sacramento, 157 pp.

Oberbauer, Thomas. 2008. Terrestrial Vegetation Communities in San Diego County Based on Holland's Descriptions. Revised from 1996 and 2005. July.

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Attachment A
PLANT SPECIES OBSERVED – SDUSD CAMP ELLIOT #3

ORDER/ FAMILY	COMMON NAME	SCIENTIFIC NAME	HABITAT‡
LYCOPHYTES			
Selaginellaceae	mesa spike-moss	*Selaginella cineracens*	DCSS
ANGIOSPERMS: EUDICOTS			
Asteraceae	coastal sagebrush	*Artemisia californica*	DCSS-D
	broom baccharis	*Baccharis sarothrioides*	DCSS
	tocalote	*Centaurea melitensis**	DCSS, DCSS-D, NNG
	garland daisy	*Chrysanthemum coronarium**	DCSS-D, NNG
	bush sunflower	*Encelia californica*	DCSS, DCSS-D
	brittlebush	*Encelia farinosa**	DCSS-D
	Crete hedypnois	*Hedypnois cretica**	DCSS
	smooth cat's ear	*Hypochaeris glabra**	DCSS-D
	goldenbush	*Isocoma menziesii*	DCSS, DCSS-D
	goldenfields	*Lasthenia glabra*	DCSS, DCSS-D
	pineapple weed	*Matricaria matricarioides**	DH
	prickly sow thistle	*Sonchus asper**	NNG
	San Diego sunflower	*Viguera lacinata*†	DCSS
Anacardaceae	lemonadeberry	*Rhus integrifolia*	DCSS
Brassicaceae	field mustard	*Brassica nigra**	DCSS, DH, NNG
Boraginaceae	felt-leaf yerba santa	*Eriodictynon crassifolius*	DCSS
	popcorn flower	*Plagiobothrys* sp.	DCSS
Cactaceae	coast cholla	*Cylindropuntia prolifera*	DCSS
Capparaceae	bladderpod	*Isomeris arborea*	DCSS
Caryophyllaceae	common catchfly	*Silene gallica**	DCSS
Crassulaceae	pygmy stonecrop	*Crassula connata*	DCSS
Curcurbitaceae	wild cucumber	*Marah macrocarpus*	DCSS
Ericaceae	mission manzanita	*Xylococcus bicolor*	DCSS
Fabaceae	golden wattle	*Acacia longifolia**	DCSS-D
	ocean locoweed	*Astragalus tricopodus var. lonchus*	DCSS
	deer weed	*Lotus scoparius*	DCSS, DCSS-D
	arroyo lupine	*Lupinus succlentus*	DCSS, DCSS-D
	collar lupine	*Lupinus truncatus*	DCSS
	Indian sweet clover	*Melilotus indica**	DCSS, DCSS-D, DH, NNG
Fagaceae	scrub oak	*Quercus berberdifolia*	DCSS

Geraniaceae	long-beak filaree	*Erodium bothrys**	DCSS, DCSS-D, NNG
	red-stem filaree	*Erodium cicutarium**	DH
Lamiaceae	black sage	*Salvia mellifera*	DCSS, DCSS-D
Malvaceae	bush mallow	*Malocathamnus fasciculatus*	DCSS
Nyctaginaceae	coastal wishbone bush	*Mirabilis laevis* var. *crassifolia*	DCSS
Plantaginaceae	dot-seed plantain	*Plantago erecta*	DCSS
Polygonaceae	coast Calfornia buckwheat	*Eriogonum fasciculatum* var. *fasciculatum*	DCSS, DCSS-D
Rhamnaceae	toyon	*Heteromeles arbutifolia*	DCSS-D
Rosaceae	chamise	*Adenostema fasciculata*	DCSS
Solaneacae	chaparral nightshade	*Solanum xantii*	DCSS

ANGIOSPERMS: EUDICOTS

Poaceae	slender wild oat	*Avena barbata**	DCSS
	common ripgut grass	*Bromus diandrus**	DCSS, DCSS-D, NNG
	soft chess	*Bromus hordeaceus**	DCSS, DCSS-D, NNG
	foxtail chess	*Bromus madritensis* ssp. *rubens**	DCSS, DCSS-D, NNG
	golden-top	*Lamarkia aurea**	DCSS-D
	purple needlegrass	*Nassella pulchra*	DCSS
	African fountain grass	*Pennisetum setaceum**	DCSS-D
	rattail fescue	*Vulpia myuros**	DCSS, DCSS-D, NNG
Themidaceae	blue dicks	*Dichelostemma capitutatum*	DCSS

*Species not native to San Diego County

‡Habitat acronyms: DH= disturbed habitat, DCSS = Diegan coastal sage scrub, DCSS-D = disturbed Diegan coastal sage scrub, NNG=non-native grassland

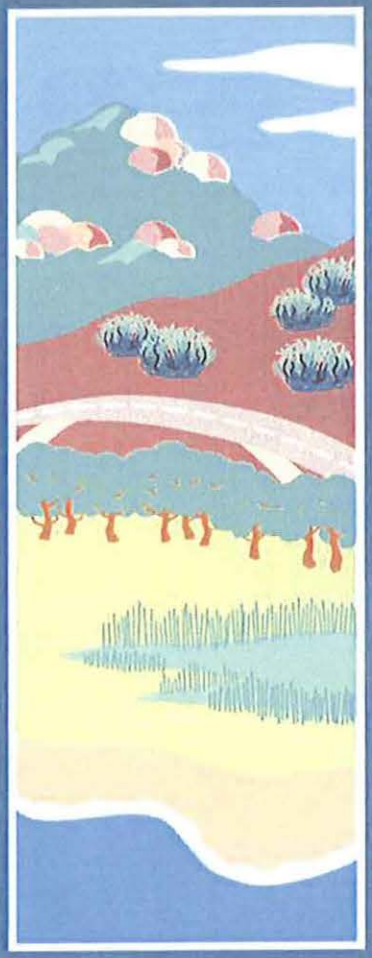
† Sensitive species

Attachment B
ANIMAL SPECIES OBSERVED – SDUSD CAMP ELLIOT #3

FAMILY	SCIENTIFIC NAME	COMMON NAME
INVERTEBRATES		
Riodinidae	*Apodemia vergulti*	Behr's metalmark butterfly
Nymphalinae	*Precis coenia*	buckeye butterfly
Pieridae	*Pieris protodice*	common white butterfly
Nymphalinae	*Vanessa cardui*	painted lady butterfly
REPTILES		
Viperidae	*Crotalus sp.*	rattlesnake – heard only
BIRDS		
Trochilidae	*Calypte anna*	Anna's hummingbird
Sylviidae	*Polioptila californica californica*	coastal California gnatcatcher - offsite
Odontophoridae	*Callipepla californica*	California quail
Mimidae	*Toxostoma redivivum*	California thrasher
Emberizidae	*Pipilo crissalis*	California towhee
Sturnidae	*Sturnus vulgaris*	European starling
Fringillidae	*Carpodacus mexicanus*	house finch
Fringillidae	*Carduelis psaltria*	lesser goldfinch
Columbidae	*Zenaida macroura*	mourning dove
Mimidae	*Mimus polyglottos*	northern mockingbird
Emberizidae	*Melospiza melodia*	song sparrow
Emberizidae	*Pipilo maculatus*	spotted towhee
Icteridae	*Sturnella neglecta*	western meadowlark
Corvidae	*Aphelocoma californica*	western scrub jay
Emberizidae	*Zonotrichia leucophyrys*	white-crowned sparrow
Timaliidae	*Chamaea fasciata*	wrentit
MAMMALS		
Leporidae	*Sylvilagus audubonii*	desert cottontail
Canidae	*Canis familiaris*	domestic dog
Cervidae	*Odocoileus hemionus*	mule deer
Procyonidae	*Procyon lotor*	raccoon

ATTACHMENT C

SAN DIEGO MSCP SUBAREA PLAN, MHPA LAND USE ADJACENCY GUIDELINES



Multiple Species
Conservation Program

City of San Diego MSCP Subarea Plan

March 1997

Prepared by the City of San Diego
Community and Economic Development Department

Environmentally Sensitive Lands Ordinance, all relevant long-range plans, as well as with the State Surface Mining and Reclamation Act (SMARA) of 1975.

3. Any sand removal activities should be monitored for noise impacts to surrounding sensitive habitats, and all new sediment removal or mining operations proposed in proximity to the MHPA, or changes in existing operations, must include noise reduction methods that take into consideration the breeding and nesting seasons of sensitive bird species.

4. All existing and future mined lands adjacent to or within the MHPA shall be reclaimed pursuant to SMARA. Ponds are considered compatible uses where they provide native wildlife and wetland habitats and do not conflict with conservation goals of the MSCP and Subarea Plan.

5. Any permitted mining activity including reclamation of sand must consider changes and impacts to water quality, water table level, fluvial hydrology, flooding, and wetlands and habitats upstream and downstream, and provide adequate mitigation.

Flood Control

1. Flood control should generally be limited to existing agreements with Resource Agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.

2. No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.

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% 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.