

MEMORANDUM

To: David Sibbet, County of San Diego Planning Manager
From: Alex Martini, Dudek Project Manager
Subject: North County Environmental Resources – Vegetation Mapping and Impacts Update (PDS2008-3500-08-015)
Date: September 4, 2019
cc: Karl Gailey, Rick Gittings, and David Hubbard
Attachment(s): Figure 1 – Biological Resources Impacts

Dear Mr. Sibbet,

The following memorandum and updated vegetation mapping is provided for the North County Environmental Resources (NCER) Recycling Facility project (PDS2008-3500-08-105) located off Mesa Rock Road within the County of San Diego (County).

1 Site Survey

The County Requested via e-mail on Monday August 5, 2019 that the applicant have a County-approved biologist conduct a habitat assessment in order to confirm if the habitat mapped on site in 2013 (BLUE Consulting 2013) is still correct, or if habitat type and/or acreage has changed. The County also requested that the site be evaluated for spiny redberry (*Rhamnus crocea*), which supports Hermes copper (*Lycaena hermes*).

On Friday August 16, 2019, County-approved biologist, Callie Amoaku, conducted a habitat assessment in order to confirm previous vegetation mapping and assess the site for Hermes copper habitat, specifically spiny redberry, using the protocol outlined in Attachment B of the County's *Report Format and Content Requirements for Biological Resources*. The August 2019 site visit was limited to the proposed impact area and unauthorized grading area.

The vegetation mapping provided in the *Biological Resources Technical Report for the North County Environmental Resources As-Built Plan* (BLUE Consulting Group 2013) included site-specific mapping for areas outside of the unauthorized grading areas; the vegetation communities and land covers within the unauthorized grading areas were done based on desktop mapping in order to estimate the vegetation cover prior to the unauthorized grading. No new grading or vegetation clearing has occurred outside of this area; therefore, within this area of the property, the desktop mapping is used and these acreages have not changed.

Within the "proposed impact" areas that occur outside of the unauthorized grading, the vegetation and land covers were updated during the August 16, 2019 visit in order to reflect the current conditions and represent any changes since the previous mapping update in 2012.

Table 1, Impacts and Mitigation to Vegetation Acreages summarize the unauthorized grading impacts¹ and the updated proposed impact areas. These impact areas are shown on Figure 1. Some areas of the project site have changed. For example, areas that have a predominance of non-native herbs or shrubs in previous scarred areas are mapped as disturbed habitat that were previously lumped in with chaparral habitat. The southern willow scrub is now dominated by coast live oaks and the mapping was changed to southern coast live oak riparian forest. The site is mainly composed of mafic southern mixed chaparral.

Spiny redberry supports Hermes cooper and grows in discrete patches within coastal sage scrub and southern mixed chaparral. The Hermes copper is an extremely rare narrow endemic butterfly species with a range restricted to San Diego County and northern Baja California. Based on the recently conducted site survey and vegetation mapping, no spiny redberry was observed within the proposed impact area and unauthorized grading area. It is documented on the plant compendium in the *Biological Resources Technical Report for the North County Environmental Resources As-Built Plan* (BLUE Consulting Group 2013) and must occur outside of the areas surveyed in August 2019.

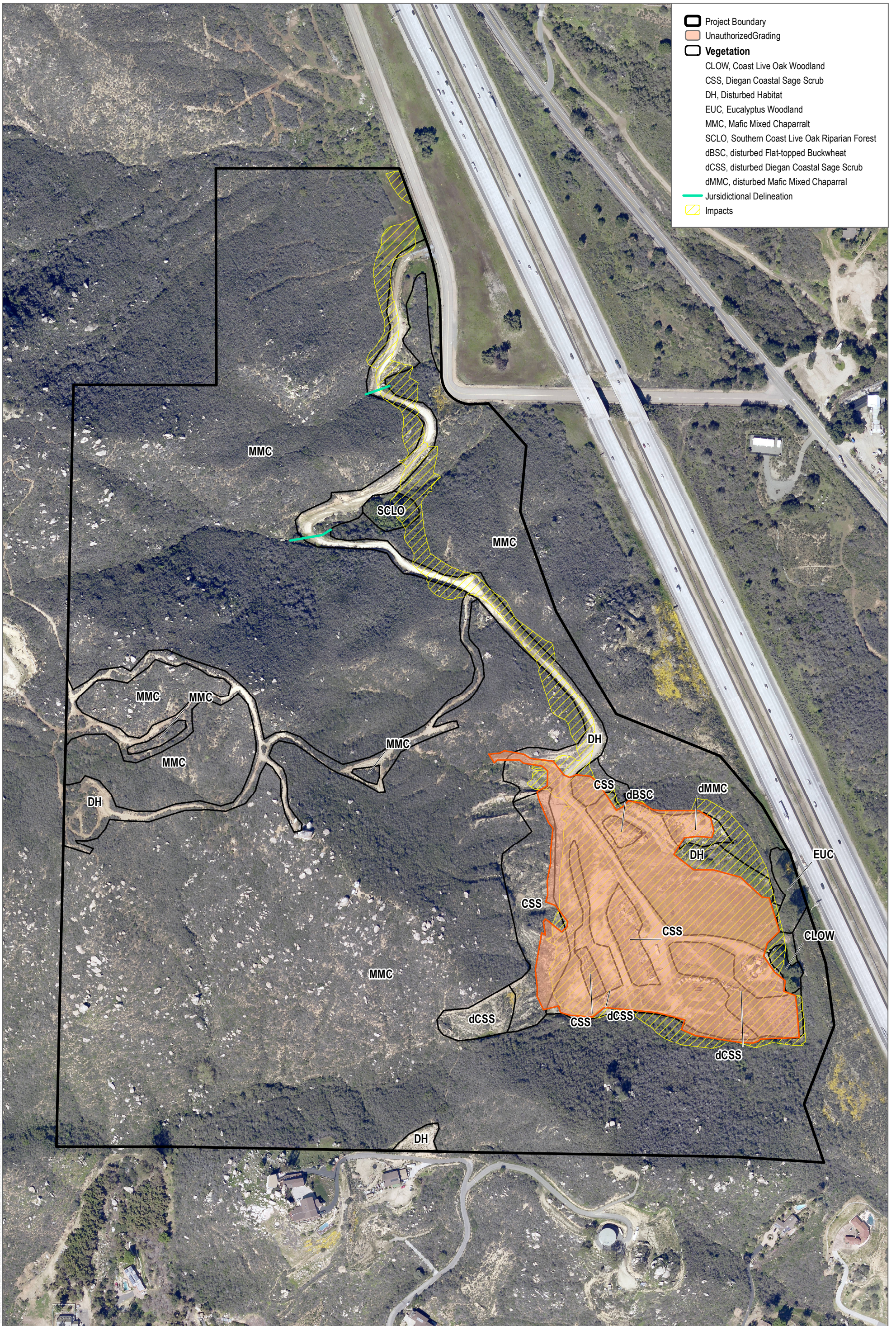
As demonstrated in Table 1, there are some changes to the vegetation communities within the additional proposed impact areas and the table reflects the updated impacts and required mitigation.

Table 1 – Impacts and Mitigation to Vegetation Acreages

Vegetation Communities/Land Cover	Unauthorized Impacts	Mitigation Ratio/Acreage	Proposed Impacts (Additional)	Mitigation Ratio/Acreage	Total Mitigation Acreage
Coastal Scrub					
Diegan coastal sage scrub (including disturbed)	0.92	3:1/2.76	0.15	2:1/0.3	3.06
Flat-topped buckwheat – disturbed	–	0	0	2:1	0
Chaparral					
Mafic southern mixed chaparral (including disturbed)	6.48	4:1/25.92	3.38	3:1/10.14	36.06
Woodland and Forest					
Coast live oak woodland	–	0	0.08	3:1	0.24
Southern coast live oak riparian forest	–	0	0.17	3:1	0.51
Non-Native Communities and Land Cover					
Disturbed Habitat	5.48	N/A	2.44	N/A	0
Eucalyptus woodland	–	N/A	0.01	N/A	0
Jurisdictional Features					
Non-Wetland Waters	–	N/A	0.0001*	1:1	0.0001*
Total	12.88	28.68	6.23	-	39.87

*Since impacts are less than one one-thousandth of an acre, impacts would be negligible, and mitigation acreage is not included in overall total.

¹ Based on Table 6 of the *Biological Resources Technical Report for the North County Environmental Resources As-Built Plan* (BLUE Consulting Group 2013)



SOURCE: SANGIS 2017