



Biological Resources Report for the
Euclid Terrace Project
San Diego, California

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A handwritten signature in black ink that reads "E. Procsal".

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Acronyms and Abbreviations

ASMDs	area specific management directives
BMPs	best management practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of San Diego
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
DSD	Development Services Department
ESA	Endangered Species Act
ESL	Environmentally Sensitive Lands
MBTA	Migratory Bird Treaty Act of 1918
MHPA	Multi-Habitat Planning Area
MSCP	Multiple Species Conservation Plan
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Services

1.0 Summary

The Euclid Terrace Project is located in the city of San Diego, California, and is not within or adjacent to the City of San Diego (City) Multi-Habitat Planning Area (MHPA). The 2.98-acre project site (survey area) was evaluated to determine the current condition of the biological resources present and to provide an impact analysis for the entire parcel.

Three sensitive vegetation communities, non-native grassland, disturbed riparian, and disturbed wetland, were identified within the survey area and impacts to these habitats would occur as a result of the proposed project. No narrow endemic plant species or state or federally listed wildlife species were detected during the biological survey, and none are anticipated to occur on-site. Mitigation for impacts to non-native grassland is proposed to be achieved through payment of fees into the City of San Diego's Habitat Acquisition Fund. Mitigation for impacts to disturbed riparian would be satisfied through purchase of 0.07 acre of Re-established River: Wetland Waters of the U.S./State credits from the San Luis Rey Mitigation Bank.

2.0 Introduction

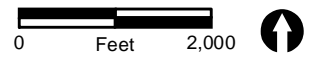
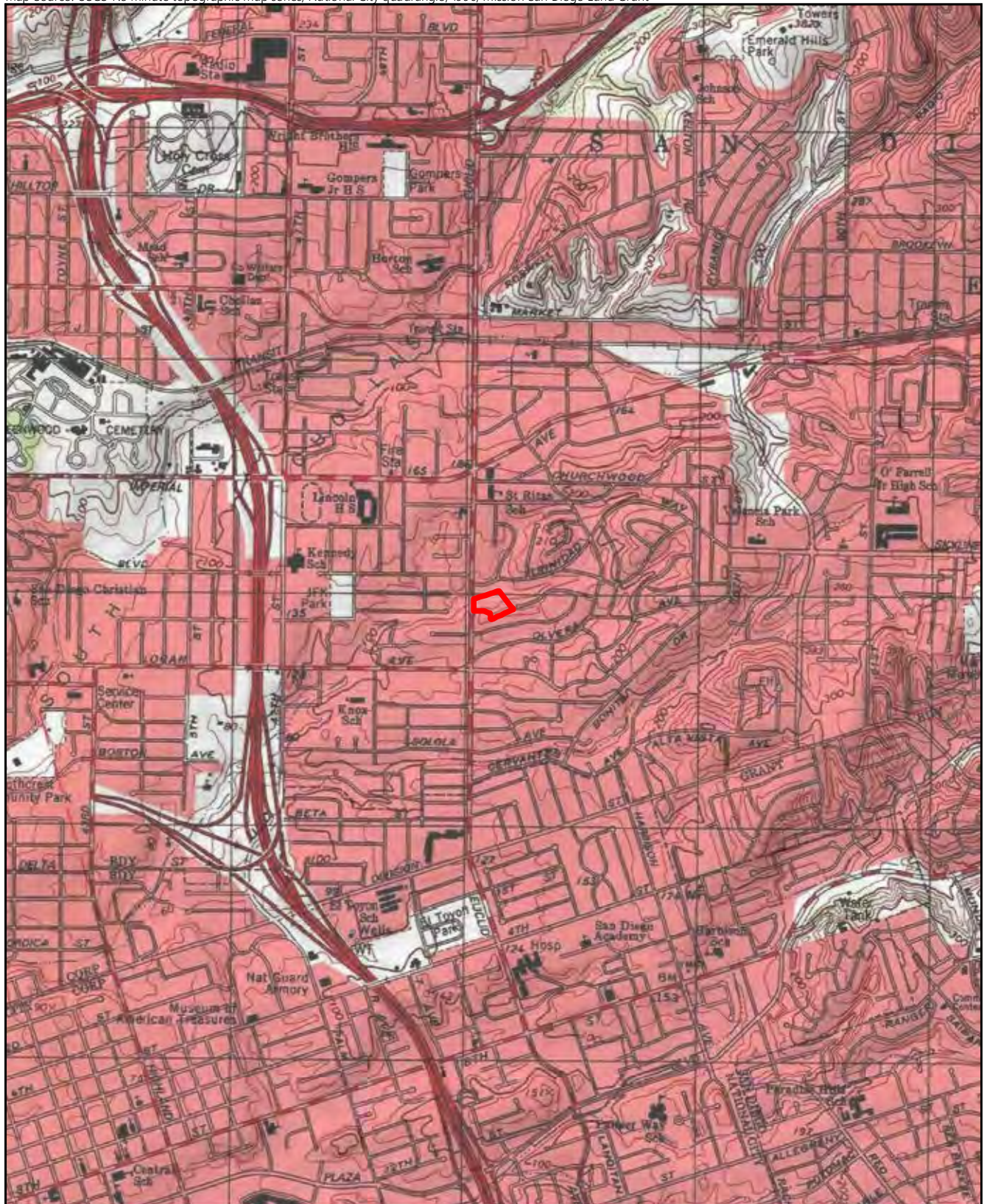
The project proposes to construct 25 single-family residential units in the community of Encanto, in southern San Diego. The survey area is east of Interstate 805, and immediately east of South Euclid Avenue (Figure 1). The survey area is found on the Mission San Diego Land Grant, of the U.S. Geological Survey (USGS) 7.5-minute topographic map, National City quadrangle (Figure 2; USGS 1996) and City, Engineering and Development, City 800' scale map Number 138-1761 (Figure 3). The survey area is composed of undeveloped land (Figure 4) and is not within or adjacent to the MHPA.

This report provides all the necessary biological data and background information required for environmental analysis according to guidelines set forth in the City's Multiple Species Conservation Plan (MSCP) Subarea Plan (1997) and the City Biology Guidelines (2018).



 Project Location

FIGURE 1
Regional Location



 Project Boundary

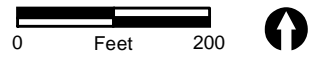
FIGURE 2
Project Location on USGS Map



 Project Boundary

FIGURE 3

Project Location on City 800' Map



 Project Boundary

FIGURE 4
Project Location on Aerial Photograph

3.0 Methods and Survey Limitations

For reporting convenience, field survey times, dates, and weather conditions are presented in Table 1. A biological survey was first conducted by RECON on July 3, 2018, and a wetland delineation was conducted on August 1, 2018. Updated biological and wetland delineation surveys were conducted by RECON biologists Gerry Schied and Beth Procsal on June 22, 2021. Vegetation communities and land cover types were mapped on a 1-inch-equals-150-feet aerial photograph of the survey area. Wildlife species were observed directly or detected from calls, tracks, scat, nests, or other signs. All plant species observed within the survey area were also noted.

Date	Surveyors	Survey Type	Beginning Conditions	Ending Conditions
7/3/2018	Beth Procsal	General Biological	8:00 a.m.; 65°F; wind 0–1 mph; 90% cloud cover	9:10 a.m.; 66°F; wind 0–1 mph; 10% cloud cover
8/1/2018	Gerry Schied Beth Procsal	Wetland Delineation	n/a*	n/a*
6/22/2021	Gerry Schied Beth Procsal	General Biological, Wetland Delineation	8:30 a.m.; 70°F; wind 0–2 mph; 75% cloud cover	10:30 a.m.; 72°F; wind 0–1 mph; 50% cloud cover

°F = degrees Fahrenheit; mph = mile per hour; % = percent; n/a = not applicable
*Beginning and ending weather conditions were not collected for these non-wildlife surveys.

Floral nomenclature for common plants follows the Jepson Online Herbarium (Jepson Flora Project 2020), for ornamental plants Brenzel (2001), and for sensitive plants California Native Plant Society (CNPS; 2021). Vegetation community classifications follow Oberbauer et al. (2008), which is based on Holland’s 1986 Preliminary Descriptions of the Terrestrial Natural Communities of California. Zoological nomenclature for birds is in accordance with the American Ornithological Society Checklist (Chesser et al. 2018) and Unitt (2004); for mammals with Baker et al. (2003); and for reptiles with Crother (2008). Determination of the potential occurrence for listed, sensitive, or noteworthy species is based upon known ranges and habitat preferences for the species (Jennings and Hayes 1994; Unitt 2004; CNPS 2021; Reiser 2001) and species occurrence records from the California Natural Diversity Database (CNDDDB; California Department of Fish and Wildlife [CDFW] 2021a).

4.0 Existing Conditions

The survey area consists of a mesa top along the southern portion of the site, a north-facing slope, and two ephemeral drainages that run along the northern perimeter. The survey area is surrounded by urban development in all directions. Elevations in the survey area range from 118 feet above mean sea level to 166 feet above mean sea level.

One soil type, Huerhuero loam, 15 to 30 percent slopes, eroded, as mapped by the U.S. Department of Agriculture (1973), occurs within the survey area. Huerhuero soils are characterized by moderately

drained loams and have a clay subsoil at a depth of 12 inches and deeper. The Huerhuero soil series is typically used for range, truck crops, tomatoes, and flowers (U.S. Department of Agriculture 1973).

4.1 Botany

Six vegetation communities and land cover types, non-native grassland, disturbed land, natural flood channel, disturbed wetland, disturbed riparian, and urban/developed land occur on-site (Figure 5; Table 2). All plant species observed are presented in Attachment 1. Under the City MSCP, the environmentally sensitive lands (ESL) regulations define sensitive upland biological resources into four tiers of sensitivity. Upland vegetation communities that are classified as Tier I (rare uplands), Tier II (uncommon uplands), or Tier III (common uplands) are considered sensitive by the City. Tier IV (other uplands) vegetation communities are not considered sensitive (City of San Diego 2018). There is no tier classification for wetland habitats (City of San Diego 2018).

Vegetation Communities/ Land Cover Types	City of San Diego ESL Tier	Total Project Area
Non-Native Grassland	III-B	1.95
Disturbed Land	IV	0.82
Natural Flood Channel	-	0.05
Disturbed Wetland	-	0.07
Disturbed Riparian	-	0.07
Urban/Developed Land	-	0.02
TOTAL	-	2.98

According to the City Biology Guidelines, non-native grassland, disturbed wetland, and disturbed riparian are considered a sensitive habitat type and natural flood channel, disturbed land and urban/developed lands are not considered sensitive habitats (City of San Diego 2018). More specifically, natural flood channel occurs within disturbed land.

4.1.1 Non-Native Grassland

Non-native grassland, a Tier III-B ESL habitat, occurs on a majority of the survey area. Annual grasses such as oats (*Avena* sp.), rip-gut grass (*Bromus diandrus*), red brome (*Bromus madritensis*), and Bermuda grass (*Cynodon dactylon*), dominate this area and range from 1 foot to 3 feet tall (Photograph 1). A native annual herb, dot-seed plantain (*Plantago erecta*), is also a dominant species on the north-facing slope on-site. Scattered individuals of native shrub and herb species such as deerweed (*Acmispon glaber*), western blue-eyed grass (*Sisyrinchium bellum*), gumplant (*Grindelia camporum*), coast California buckwheat (*Eriogonum fasciculatum*), and needle grass (*Stipa* sp.), also occur within the grassland. These native species are too few and widespread to form native habitat.



- Project Boundary
- Culvert
- Vegetation Community**
- Disturbed Wetland
- Disturbed Riparian
- Natural Flood Channel
- Non-Native Grassland
- Disturbed Land
- Urban/Developed



FIGURE 5
Existing Biological Resources



PHOTOGRAPH 1
Non-Native Grassland within Survey Area, Looking South
Photo Date: June 22, 2021

4.1.2 Disturbed Land

Disturbed land, a Tier IV ESL habitat, occurs along the southern and northern ends of the site on the mesa top, along the pedestrian path through the middle of the site, and in large patches of freeway iceplant (*Carpobrotus edulis*), on the west end of the site (Photograph 2). Generally, this land cover type is open and has sparse vegetation consisting of rip-gut grass, Bermuda grass, Russian thistle (*Salsola tragus*), and Australian saltbush (*Atriplex semibaccata*). Dot-seed plantain is also abundant within the disturbed land. A few horticultural species were observed within the disturbed land including Brazilian pepper tree (*Schinus terebinthifolius*) and large-flowered yucca (*Yucca grandiflora*).

4.1.3 Natural Flood Channel

One ephemeral drainage crosses through the northern portion of the project from east to west, totaling 0.05 acre (Photograph 3). The channel crosses through disturbed land and non-native grassland areas and is vegetated with mostly non-native species, such as wild oat, rip-gut grass, and Russian thistle.

4.1.4 Disturbed Wetland

Disturbed wetland occurs within the banks of the drainage and is dominated by giant reed (*Arundo donax*) (Photograph 4). The density of the giant reed is as high as 100 percent in some portions of the main drainage.

4.1.5 Disturbed Riparian

Disturbed riparian consists of the non-native vegetation outside of the bed and bank of the stream course and is dominated by giant reed. Brazilian pepper tree (*Schinus terebinthifolius*) and mule fat (*Baccharis salicifolia*) are also present in small clumps within this vegetation community. The edges of this habitat are dense in some areas and open in others where homeless encampments are present (Photographs 5 and 6).

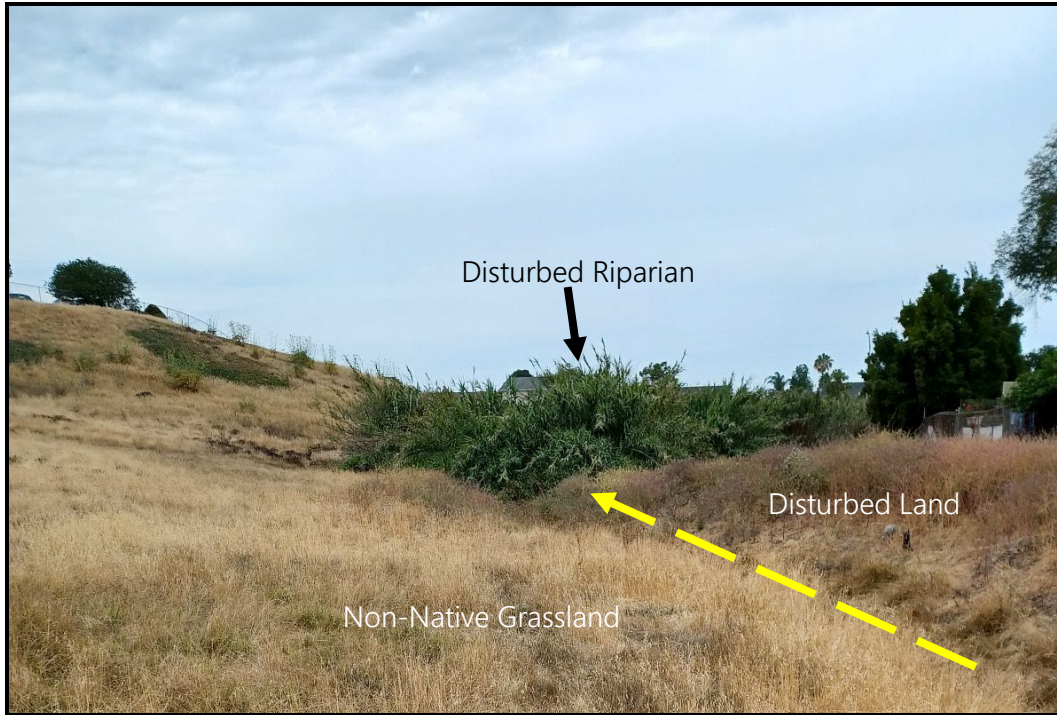
4.1.6 Urban/Developed Land

Urban/developed land occurs along the western perimeter of the survey area adjacent to Euclid Avenue and at the terminus of San Bernardo Terrace. This land cover type consists of sidewalk and concrete along the side of the sidewalk. Freeway iceplant occurs within this land cover type.



PHOTOGRAPH 2

Disturbed Land within the Survey Area, Located North
of the Ephemeral Drainage, Looking East
Photo Date: June 22, 2021



PHOTOGRAPH 3

View of Natural Flood Channel (represented by yellow line) Occurring Along the Northern Portion of the Project, Looking West
Photo Date: June 22, 2021



PHOTOGRAPH 4
View of Disturbed Wetland, Looking East
Photo Date: June 22, 2021



PHOTOGRAPH 5
View of Disturbed Riparian, Looking North
Photo Date: June 22, 2021



PHOTOGRAPH 6
View of Disturbed Riparian, Looking West
Photo Date: June 22, 2021

4.2 Zoology

Eight wildlife species were observed within the survey area and include those adapted to urban and developed areas. These species include western bluebird (*Sialia mexicana*), American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaidura macroura*), black phoebe (*Sayornis nigricans*), house finch (*Haemorhous mexicanus*), Eurasian collared-dove (*Streptopelia decaocto*), house sparrow (*Passer domesticus*), and lesser goldfinch (*Spinus psaltria*).

5.0 Regulatory Framework

5.1 Federal Regulations

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

The federal Migratory Bird Treaty Act (MBTA) was established to provide protection to the breeding activities of migratory birds throughout the United States. The MBTA protects migratory birds and their breeding activities from take and harassment. The project is designed to comply with MBTA, which precludes direct impacts to nesting birds and raptors.

5.2 State Regulations

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

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

Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.3 of the California Fish and Game Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs. The project is designed to comply with Sections 3503 and 3503.3 which precludes direct impacts to nesting birds and raptors.

5.3 Local Regulations

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

The City’s Biology Guidelines (2018) were formulated to aid in the implementation and interpretation of the ESL Regulations, San Diego Land Development Code, Chapter 14, Division 1, Section 143.0101. Section III of the Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impacts and mitigation under CEQA. The ESL defines sensitive biological resources as those lands included within the MHPA as identified in the City’s MSCP Subarea Plan (City of San Diego 1997), and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I (rare uplands), II (uncommon uplands), IIIA (common uplands) or IIIB (common uplands); habitat for rare, endangered, or threatened species; or narrow endemic species.

Per San Diego Municipal Code Section 143.0101, the purpose of the ESL Regulations is to protect, preserve, and where damaged, restore these lands of San Diego and viability of the species supported by those lands. ESL regulations are meant to protect the quality of the resources and natural character of the area to be developed, including, but not limited to coastal development in the Coastal Overlay Zone.

6.0 Sensitive Biological Resources

6.1 Sensitivity Criteria/Regulatory Setting

For purposes of this report, plant and animal species will be considered sensitive if they are:

1. Listed by state or federal agencies as threatened or endangered or are proposed for listing;
2. Designated by the City as a narrow endemic species (City of San Diego 1997, 2018);
3. Covered species under the MSCP (City of San Diego 1997) or Vernal Pool Habitat Conservation Plan (City of San Diego 2019);
4. Given a California Rare Plant Rank (CRPR) 1B (considered endangered throughout its range), 2 (considered endangered in California but more common elsewhere), 3 (more information

about the plant's distribution and rarity needed), or 4 (plants of limited distribution) in the CNPS Inventory of Rare and Endangered Plants of California (CDFW 2021a);

5. Considered rare, endangered, or threatened by CDFW (2021b-e); or
6. Identified by another recognized conservation or scientific group as being depleted, potentially depleted, declining, rare, critical, endemic, endangered, or threatened.

City of San Diego Regulations: As stated in the City 2018 Biology Guidelines, a project site is considered to contain sensitive biological resources if:

1. The site has been identified as part of the MHPA by the City's MSCP Subarea Plan or the Vernal Pool Habitat Conservation Plan. MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource.
2. The site supports Tier I, II, or IIIA and IIIB vegetation communities (such as grassland, chaparral, coastal sage scrub, etc.). The CEQA determination of significant impacts may be based on what was on the site (e.g., if illegal grading or vegetation removal occurred, etc.), as appropriate.
3. The site contains, or comes within 100 feet of, a natural drainage.
4. The site occurs within the 100-year floodplain established by the Federal Emergency Management Agency or the floodplain/floodway zones.
5. The site has potential to provide habitat for threatened, endangered, or otherwise protected wildlife species.

MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. The closest MHPA is 0.67 mile to the northeast.

All wetland areas, including wetland buffers, and non-wetland waters and streambeds are considered sensitive. Wetlands and non-wetland waters are under the jurisdiction of the U.S. Army of Engineers (USACE) and California Regional Water Quality Control Board (RWQCB). Streambeds and associated vegetation are under the jurisdiction of the CDFW. The City defines wetlands as areas which are characterized by any of the following conditions:

- Areas supporting naturally occurring wetland vegetation communities with a predominance of hydrophytic plant species.
- Areas lacking naturally occurring wetland vegetation communities that have hydric soils or wetland hydrology still present and past human activities have occurred to remove historic

vegetation, or catastrophic or recurring natural events preclude the establishment of wetland vegetation.

- Seasonal drainages that have wetland dependent vegetation present in the drainage or lacking due to human activities.
- Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previous existing wetlands.
- Areas that contain wetland vegetation, soils, or hydrology created by human activities in historically non-wetland areas where they have been delineated as wetland by USACE and/or CDFW.
- Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

6.2 Sensitive Vegetation Communities

Non-native grassland (Tier III-B), disturbed riparian and disturbed wetland are considered sensitive habitats under the City's MSCP (City of San Diego 1997). These sensitive vegetation communities are shown on Figure 5.

6.3 Sensitive Plants

No MSCP-covered, narrow endemic, or state or federally listed sensitive plant species were observed on the project site and none are expected to occur due to the level of disturbance on-site. An assessment of the potential for sensitive plant species to occur within one mile of the survey area based on a CNDDDB review is presented in Attachment 2.

6.4 Sensitive Wildlife Species

One MSCP-covered wildlife species, western bluebird, was observed on-site during the general survey. No state or federally listed sensitive wildlife species are expected to occur due to the level of disturbance on-site and lack of native habitat.

Wildlife species known to occur in the project vicinity (i.e., within one mile of the survey area) that are federally listed, threatened, endangered, or that have potential to occur based on species range are addressed in Attachment 3.

6.5 Jurisdictional Waters

A wetland/waters delineation was performed on-site according to the guidelines set forth by USACE (1987, 2008). A wetland/waters delineation is used to identify and map the extent of the wetlands and waters of the U.S. and provide information regarding jurisdictional issues. The methods used for the wetland delineation and survey findings are further discussed in the wetland delineation report

prepared for the project (Attachment 4). The jurisdictional waters mapped on-site are summarized in Tables 3a-3c and shown on Figures 6a–6c.

Table 3a USACE/RWQCB Jurisdictional Resources within the Survey Area	
Jurisdictional Aquatic Resource	Existing Area (acres)
<i>Non-wetland Waters</i>	
Natural Flood Channel	0.05
<i>Total Non-wetland Waters</i>	<i>0.05</i>
Total Jurisdictional Area	0.05

Table 3b CDFW Jurisdictional Wetlands and Streambed within the Survey Area	
Jurisdictional Resource	Existing Area (acres)
<i>Wetland or Riparian Areas</i>	
Disturbed Wetland	0.07
Disturbed Riparian	0.07
<i>Total Wetlands/Riparian</i>	<i>0.14</i>
<i>Non-wetland Waters/Streambed</i>	
Natural Flood Channel	0.05
<i>Total Non-wetland Waters/Streambed</i>	<i>0.05</i>
Total Jurisdictional Area	0.19

Table 3c City of San Diego Jurisdictional Wetlands within the Survey Area	
Jurisdictional Wetlands	Existing Area (acres)
<i>Wetland or Riparian Areas</i>	
Disturbed Wetland	0.07
Disturbed Riparian	0.07
<i>Total Wetlands/Riparian</i>	<i>0.14</i>
Total Jurisdictional Area	0.14



- Project Boundary
- USACE/RWQCB Non-wetland Waters
- Sample Point
- Culvert

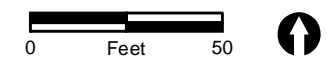


FIGURE 6a
Waters of the U.S. and Waters of the State
within the Euclid Terrace Project








-  Project Boundary
-  CDFW Disturbed Riparian
-  CDFW Disturbed Wetland
-  CDFW Streambed
-  Culvert



FIGURE 6b
CDFW State Waters within
the Euclid Terrace Project



-  Project Boundary
-  City Wetland



FIGURE 6c
City of San Diego Wetland
within the Euclid Terrace Project

6.5.1 Federal Waters of the U.S.

According to the USACE manual (USACE 1987), wetlands are defined as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions.” In accordance with Section 404 of the Clean Water Act, the USACE regulates the discharge of dredged or fill material into waters of the U.S.

Wetlands are delineated using three parameters: hydrophytic vegetation, wetland hydrology, and hydric soils. According to the USACE, positive indicators for all three parameters (hydrophytic vegetation, hydric soils, and wetland hydrology) must be present to qualify as a wetland. The USACE also requires the delineation of non-wetland jurisdictional waters. These waters must have strong hydrology indicators such as the presence of seasonal flows and an ordinary high-water mark.

The USACE jurisdiction area within the survey area totals 0.05 acre, which includes USACE non-wetland waters of the U.S. Non-wetland waters within the survey area are located within the ordinary high-water mark of the ephemeral drainage channels (see Figure 6a).

6.5.2 Waters of the State

The RWQCB is the regional agency responsible for protecting water quality in California. The jurisdiction of this agency includes waters of the state and all waters of the United States as mandated by both the federal Clean Water Act Section 401 and the California Porter-Cologne Water Quality Control Act. Jurisdictional waters are delineated by using the three-perimeter definition similar to the federal definition requiring a predominance of hydrophytic vegetation, hydric soils, and hydrology (RWQCB 2020).

RWQCB waters of the state include 0.05 acre of the survey area (see Figure 6a). These waters are equivalent to the USACE non-wetland waters.

6.5.3 CDFW State Waters

Under Sections 1600–1607 of the Fish and Game Code, the CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. Jurisdictional waters are delineated by the outer edge of wetland vegetation, riparian habitat, or at the top of the bank of streams or lakes, whichever is wider.

All streambeds and associated wetlands are considered sensitive. These areas fall under the jurisdiction of the CDFW (Section 1600 of the California Fish and Game Code). The CDFW jurisdictional areas extend to the outer edge of wetland vegetation or to the top of the bank of streams or lakes, whichever is wider.

A total of 0.19 acre of CDFW state water areas occur within the survey area, which includes 0.05 acre of CDFW streambed, 0.07 acre of disturbed wetland, and 0.07 disturbed riparian (see Figure 6b). Within the survey area, CDFW streambed is equal to USACE non-wetland waters.

6.5.4 City of San Diego Wetlands

City of San Diego wetlands occur on the site where CDFW disturbed wetlands and disturbed riparian were delineated within and adjacent to the stream course (Figure 6c). The non-wetland portions of the ephemeral drainages do not meet the criteria to be considered City wetlands, as hydric soils, wetland hydrology, and wetland vegetation are absent.

6.6 Wetland Buffer

Under current conditions, the minimum buffer width from the wetland habitats is 20 feet to the north, as the disturbed riparian occurs just south of the existing development (Figure 7). The wetland is buffered by 283 feet southeast from the nearest housing development, approximately 168 feet south to the home immediately adjacent to the project, and 20 feet west to Euclid Avenue. This buffer area is currently comprised of non-native grassland, disturbed riparian, and disturbed land, and is heavily dominated by non-native species. As part of the project design, a proposed wetland buffer that between the southern edge of the wetland and the northern edge of the development is being provided to protect and maintain the functions and values of the on-site wetland. As part of the enhancement effort, the giant reed within the buffer will be removed and the buffer would also be planted with native species including coast live oak (*Quercus agrifolia*), coyote brush (*Baccharis pilularis*), deerweed (*Acmispon glaber*), California buckwheat (*Eriogonum fasciculatum*), and common goldfields (*Lasthenia gracilis*).

A buffer of 15 to 20 feet was recommended by the CDFW and RWQCB during the previous pre-application meeting on May 14, 2019. Therefore, this buffer width is considered adequate due to the marginal functions and values of the drainage, which is currently dominated by invasive species and has been heavily disturbed by encampments and trash. Furthermore, the native plant species would enhance the quality of the buffer from existing conditions and help screen the drainage from the proposed development on the most western end of the property. No development is proposed to the north of the drainage; therefore, the existing wetland buffer would be maintained in this area.

In order to ensure that the wetland buffer provides protection of the functions and values of the disturbed wetlands, disturbed riparian, and streambed, the following measures would be implemented to reduce avoid and minimize edge effects:

- Barrier plantings will be installed along the outer edge of the buffer to restrict access to the adjacent wetlands and streambed.
- Additionally, a retaining wall shall be installed at the outer edge of the buffer and signage posted that informs people of the sensitive nature of the adjacent wetland habitat.
- Only native plants will be used in the revegetation of the wetland buffer as shown on the project landscape plans.













-  Project Boundary
-  Impact Footprint
-  Wetland Buffer
-  Culvert
- Vegetation Community**
-  Disturbed Wetland
-  Disturbed Riparian
-  Natural Flood Channel
-  Non-Native Grassland
-  Disturbed Land
-  Urban/Developed



FIGURE 7
Impacts to Biological Resources

6.7 Wildlife Movement Corridor

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important, because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by resource and conservation agencies.

The survey area does not function as a significant wildlife movement corridor. The site is surrounded by residential development, roads, and fencing, which ultimately restrict its use by wildlife. Although the survey area may function for local wildlife movement, the site is not a significant MSCP regional corridor and does not provide a throughway for wildlife species into major areas of off-site habitats.

7.0 MSCP Compliance

Special measures to MSCP-covered species, called area specific management directives (ASMDs), include specific guidelines for managing and monitoring covered species and their habitats, including following best management practices (BMPs). Implementation of ASMDs would also be included as conditions of project approval (e.g., Site Development Permit conditions).

MSCP-covered species observed or that have a high-to-moderate potential to occur within the limits of disturbance include western bluebird. Although there are no specified ASMDs listed in Appendix A of the MSCP Subarea Plan for western bluebird, the project would comply with the MSCP with implementation of the mitigation and avoidance measures listed in Sections 8.2.1 MSCP Covered Wildlife Species and 8.4.3 Indirect Impacts to Sensitive Wildlife.

8.0 Project Impacts

Impacts to biological resources due to the proposed project were assessed according to guidelines set forth in the City's Development Services Department CEQA Significance Thresholds (City of San Diego 2016), the Biology Guidelines (City of San Diego 2018), and the MSCP (City of San Diego 1997). Mitigation would be required for impacts that are considered significant under these guidelines.

8.1 Direct Impacts to Vegetation Communities/Land Cover Types

The impacts to vegetation communities/land cover types from the project are listed in Table 4 and shown on Figure 7. The project will result in impacts to 1.95 acres of non-native grassland, 0.02 acre of disturbed riparian, 0.71 acre of disturbed land, and 0.02 acre of urban/developed. Disturbed

riparian vegetation (0.03 acre) will also be removed within the wetland buffer. Impacts to non-native grassland (Tier III-B) and disturbed riparian are considered significant and would require mitigation (City of San Diego 2018).

Impacts to disturbed land and urban/developed land are not considered significant and do not require mitigation. Natural flood channel will not be impacted. The project proposes alternative compliance for brush management and does not include brush management zones.

It is also the intention of the Applicant to clean up the creek area for aesthetic reasons and remove all of the invasive, non-native vegetation associated with the disturbed wetland (0.07 acre) and the remaining 0.02 acre of disturbed riparian vegetation within the area north of the development footprint boundary and beyond the wetland buffer (see Figure 7) Removal of habitat would be accomplished without heavy equipment by cutting this vegetation at ground level and spraying with glyphosate-based herbicide safe to use in aquatic settings.. Clean up of the creek area using this method would not result in impacts to disturbed riparian and disturbed wetlands.

Vegetation Communities/ Land Cover Types	City of San Diego Tier	Existing Survey Area	Total Survey Area Impacts	Remaining Acreage not impacted
Non-Native Grassland	III-B	1.95	1.95	--
Disturbed Land	IV	0.82	0.71	0.11
Natural Flood Channel	-	0.05	0.00	0.05
Disturbed Wetland	-	0.07	0.00	0.07
Disturbed Riparian	-	0.04	0.02	0.02
Disturbed Riparian (within the wetland buffer only)	-	0.03	0.03	--
Urban/Developed Land	-	0.02	0.02	--
TOTAL	-	2.98	2.73	0.25

8.2 Direct Impacts to Wildlife Species

General Wildlife. The project may result in direct impacts to small mammals and reptiles with low mobility. Many mammal species and most birds will be able to move out of the way during grading. These impacts to general wildlife are considered less than significant and, therefore, would not require mitigation.

8.2.1 MSCP-Covered Wildlife Species

Impacts to MSCP-covered species are significant but mitigated through habitat-based mitigation, (i.e., no species-specific mitigation needed). Habitat-based compensatory mitigation is described in Section 8.1.

8.3 Jurisdictional Waters

USACE, RWQCB, CDFW, and City wetland/waters are regulated by the federal, state, and local governments under a no-net-loss policy, and all impacts are considered significant and need to be avoided to the greatest extent possible. The applicant would be required to confer with the resource agencies to acquire the appropriate permits for impacts to jurisdictional waters and to determine necessary mitigation for impacts to these areas. In anticipation of this project, preliminary habitat mitigation based on the City’s 2018 Biology Guidelines is proposed for impacts to state and federal jurisdictional waters.







Tables 5a-5c summarize the direct impacts to USACE, CDFW and RWQCB jurisdictional waters/wetlands. Impacts to these jurisdictional waters are shown in Figures 8a–8c. Per the pre-application meeting on May 14, 2019, held with USACE, CDFW, and RWQCB, the removal of disturbed riparian vegetation within the wetland buffer is considered an unregulated activity and not a significant impact as this removal activity will be done any hand and without any heavy equipment. The City does consider the removal of the 0.03 acre of disturbed riparian habitat to be a significant impact and will require mitigation.

Table 5a Impacts to USACE/RWQCB Jurisdictional Resources		
Jurisdictional Aquatic Resource	Existing Area (acres)	Impacts (acres)
<i>Non-wetland Waters</i>		
Natural Flood Channel	0.05	0.00
<i>Total Non-wetland Waters</i>	<i>0.05</i>	<i>0.00</i>
Total Jurisdictional Area	0.05	0.00

Table 5b Impacts to CDFW Jurisdictional Wetlands and Streambed		
Jurisdictional Resource	Existing Area (acres)	Impacts (acres)
<i>Wetland or Riparian Areas</i>		
Disturbed Wetland	0.07	0.00
Disturbed Riparian	0.07	0.02
<i>Total Wetlands/Riparian</i>	<i>0.14</i>	<i>0.00</i>
<i>Non-wetland Waters/ Streambed</i>		
Natural Flood Channel	0.05	0.00
<i>Total Non-wetland Waters/Streambed</i>	<i>0.05</i>	<i>0.00</i>
Total Jurisdictional Area	0.19	0.02

Table 5c Impacts to City of San Diego Jurisdictional Wetlands		
Jurisdictional Wetlands	Existing Area (Acres)	Impacts (acres)
<i>Wetland or Riparian Areas</i>		
Disturbed Wetland	0.07	0.00
Disturbed Riparian	0.04	0.02
Disturbed Riparian (within the wetland buffer only)	0.03	0.03
<i>Total Wetlands/Riparian</i>	<i>0.14</i>	<i>0.00</i>
Total Jurisdictional Area	0.14	0.05



-  Project Boundary
-  Impact Footprint
-  Wetland Buffer
-  USACE/RWQCB Non-wetland Waters
-  Sample Point
-  Culvert

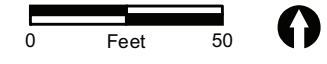


FIGURE 8a
Impacts to Waters of the U.S.
and Waters of the State
within the Euclid Terrace Project










-  Project Boundary
-  Impact Footprint
-  Wetland Buffer
-  CDFW Disturbed Riparian
-  CDFW Disturbed Wetland
-  CDFW Streambed
-  Culvert



FIGURE 8b
Impacts to CDFW State Waters
within the Euclid Terrace Project



-  Project Boundary
-  Impact Footprint
-  Wetland Buffer
-  City Wetland



FIGURE 8c
Impacts to City of San Diego Wetland
within the Euclid Terrace Project

8.3.1 Impacts to City of San Diego Wetlands Outside of the Coastal Overlay Zone

The City Biology Guidelines (2018) and the ESL Regulations state that impacts to wetlands should be avoided and unavoidable impacts should be minimized to the maximum extent practicable. A wetland buffer shall be maintained around all remaining wetlands as appropriate to protect the functions and values of the wetland.

For projects in the City, outside of the Coastal Overlay zone, impacts to wetlands, excluding vernal pools outside of the MHPA, require a deviation from the ESL wetland regulations (City of San Diego 2018). Deviations from the wetland regulations shall not be granted unless the development qualifies to be processed as one or more of the following three options: Essential Public Projects Option, Economic Viability Option, and Biologically Superior Option. The project includes a wetland deviation under the Biologically Superior Option. Both the City of San Diego and the Wildlife Agencies would need to review and concur with the Biologically Superior Option impact analyses, as discussed below.

a. Biologically Superior Option

In order to qualify as the Biologically Superior Option, a project deviating from wetland regulations must: (1) fully describe and analyze a no project alternative, a wetlands avoidance alternative, and a biologically superior alternative demonstrating that the proposed project would result in the conservation of a biologically superior resource compared to strict compliance with the provisions of the ESL; (2) demonstrate that the wetland resources being impacted by the project shall be limited to wetlands of low biological quality; (3) demonstrate that the project and associated mitigation conform to the requirements for this option that include avoidance, minimization, and compensatory measures which would result in a biologically superior net gain in overall function and values of the type of wetland resource being impacted and/or the biological resources to be conserved; and (4) obtain concurrence from the USFWS and the CDFW (Wildlife Agencies). These four criteria are described below.

Criteria 1

No Project Alternative

Under the no project alternative, the project proposed in this report would not be constructed. The site would remain undeveloped but would likely continue to undergo regular human disturbance from invasive species, homeless encampments, and trash.

Wetlands Avoidance Alternative

Under the wetlands avoidance alternative, the project would be designed to avoid all City wetlands. The undeveloped areas within the southern portion of the project site could be developed without impacting the disturbed riparian or disturbed wetland. However, this would require redesign of the driveway and reduce the overall number of units, as well as the incorporation of native creek trees and community street trees. Due to constrained space and access, the wetland avoidance alternative would be infeasible.

Criteria 2

Demonstration of the Proposed Project as a Biologically Superior Option

Wetland Buffer

As the biologically superior option, the project would provide a buffer to the on-site drainage of 15 to 20 feet. The buffer would be planted with native transitional species such as coast live oak, coyote brush, deerweed, California buckwheat, and common goldfields, improving the quality of the buffer, which is currently dominated by non-native, invasive species.

Wetland Quality

Under the Biologically Superior Option, impacts to wetlands may be considered if the resources are of a low quality, and through project design and/or mitigation a biologically superior project would result. Mitigation would occur through permittee responsible mitigation (e.g., habitat creation) or the purchase of credits from an approved mitigation bank to achieve a no-net-loss. The guidelines specify that the biological quality of all wetlands is assessed using the criteria listed below. Corresponding project details follow each criterion below.

- Criteria to determine biological quality of all wetland types include, but are not limited to, the following:

- a. Use of the wetland by federal and/or state endangered, threatened, sensitive, rare and/or other indigenous species;

Discussion: No federal and/or state endangered, threatened, sensitive, or rare species are anticipated to use the wetlands, as detailed in Attachments 2 and 3.

- b. Diversity of native flora and fauna present (characterizations of flora and fauna must be accomplished during the proper season, and surveys must be done at the most appropriate time to characterize the resident and migratory species);

Discussion: The wetlands are of low species diversity and are dominated by dense stands of giant reed, an invasive species. The density of this species is as high as 100 percent in some areas of the drainage, with some scattered individuals of Brazilian pepper tree and mule fat present. Overall, the habitat is considered to provide marginal habitat value for wildlife.

- c. Enhancement or restoration potential;

Discussion: The potential to restore or enhance the wetlands are considered low due to the invasive species, high levels of disturbance from homeless encampments, and lack of hydrology (as detailed further below). Although enhancement has been proposed as a project feature to beautify the areas north of the development footprint, it is not proposed as mitigation given the general disturbed condition of the area.

- d. Habitat function/ecological role of the wetland in the surrounding landscape, considering
 1. The current functioning of the wetland in relation to historical functioning of the system; and
 2. Rarity of the wetland community in light of the historic loss and remaining resource;

Discussion: Currently, the wetlands are of low-quality due to invasive species and high levels of disturbance from homeless encampments. The drainage on-site drains into a storm drain under Euclid Avenue. Wetland and riparian habitat within and adjacent to the drainage is dominated by giant reed. Cal-IPC gives this species a 'High' invasive rating and defines giant reed as having a severe ecological impact on physical processes, plant and animal communities, and vegetation structure. Historically, the wetland and riparian vegetation has been present within this portion of the drainage on-site since before the 1980s and it is assumed to have been vegetated with native species in the past. The wetlands provide minimal functions and values in the surrounding landscape as the wetlands are located in an area of dense urban development outside of the MHPA and are not adjacent to any areas of offsite open space or wetlands.

- e. Connectivity to other wetland or upland systems (including use as a stopover or stepping stone by mobile species), considering:
 3. proximity of the wetland resource to larger natural open spaces, and
 4. long-term viability of resource, if avoided and managed;

Discussion: The wetlands consist of an isolated channel that is fed by storm and urban-runoff discharged from a culvert outlet from the housing development to the east, and lack connectivity to other wetland or upland systems or areas of larger natural open spaces. The low-quality of the disturbed riparian habitat justifies the need for this deviation and due to the invasive nature of giant reed, any enhancement for this area is appropriate and has been encouraged by the Resource Agencies. The wetlands are not anticipated to be used as stopover or stepping stone habitat due to the surrounding dense urban development, and lack of native habitat diversity. If the wetlands are avoided (i.e., the project is not developed), it would take a significant effort to manage the area to eliminate the encampments and improve the functions and values of the wetlands.

- f. Hydrologic function, considering:
 5. Whether the volume and retention time of water within the wetland is sufficient to aid in water quality improvements, and
 6. Whether there is significant flood control value or velocity reduction function; and,
 7. Whether there is an opportunity to restore the hydrologic functions;

Discussion: The hydrologic functions within the wetlands are minimal, as flows are low frequency, relatively low volume, and of short duration. The potential to restore

hydrological functions is also limited due to the surrounding urban development and lack of significant flows.

- g. Status of watershed considering whether the watershed is partially developed, irrevocably altered, or inadequate to supply water for wetland viability;

Discussion: The watershed of the wetlands consists of dense urban development and lacks natural water sources for wetland viability.

- h. Source and quality of water, considering:

8. Whether the urban runoff is from a partially developed watershed;

9. Whether the water source is in part or exclusively from human -caused runoff which could be eliminated by diversion; and

10. Whether there is an opportunity to restore the water quality or flood control value.

Discussion: The source of water within the wetlands are from storms and urban runoff discharged from a culvert outlet from the housing development to the east. The potential to restore the water quality or flood control value under the current conditions is minimal, as flows are low frequency, relatively low volume, and of short duration.

Criteria 3

The project and proposed mitigation shall conform to the requirements for this option as detailed in Section III.B.

Discussion: Mitigation is discussed in the Biological Resources Report and complies with Section IIIB of the City of San Diego Biology Guidelines.

Criteria 4

The Wildlife Agencies must concur with the biologically superior project design and analyses. The concurrence shall be in writing and be provided prior to or during the public review of the CEQA document in which the biologically superior project design has been fully described and analyzed. Lack of unequivocal response during the CEQA public review period is deemed to be concurrence.

Discussion: The project's Biologically Superior Option was presented to the City MSCP staff and Wildlife Agencies on February 17, 2023, and was approved. Concurrence emails from the USFWS and CDFW are provided in Attachment 5.

8.4 Indirect Impacts

Indirect impacts are secondary impacts that are caused as a result of a direct impact (City of San Diego 2018). For instance, fugitive dust from heavy equipment use may settle on nearby vegetation and interfere with photosynthetic processes and the construction equipment noise levels or lighting could interfere with reproductive behavior of sensitive bird species during their breeding seasons. Edge effects are

another form of indirect impacts, and include (but are not limited to) trampling, dumping, vehicular traffic, competition with invasive species, parasitism by brown-headed cowbirds, predation by domestic animals, noise, collecting, recreational activities, and other human intrusion (City of San Diego 1997).

8.4.1 Indirect Impacts to Sensitive Upland Vegetation Communities

Indirect impacts to sensitive vegetation communities due to fugitive runoff (erosion) are not anticipated, as BMPs, such as silt fencing, will be installed around the perimeter of the grading limits. During construction indirect impacts from of fugitive dust would be prevented by watering of haul roads and areas actively being used by equipment.

8.4.2 Indirect Impacts to Jurisdictional Wetlands and Waters

During construction, all indirect impacts to wetland and non-wetland biological resources immediately adjacent to the development footprint, such as invasion of non-native species, fugitive dust, and fugitive water, will be avoided through implementing BMPs, including, but not limited to silt fencing, straw wattle, and sandbags.

8.4.3 Indirect Impacts to Sensitive Wildlife

Indirect impacts to western bluebird as a result of construction and/or maintenance-related erosion, contaminated runoff, or generation and deposition of dust are anticipated to be less than significant with adherence to proper BMPs during construction. No nighttime lighting is proposed during construction activities.

9.0 Mitigation

Mitigation is required for project impacts that are considered significant under CEQA, as detailed in the City's Significance Determination Thresholds (City of San Diego 2016). All impacts to sensitive biological resources should be avoided to the maximum extent feasible and minimized prior to proposing mitigation whenever possible. Mitigation is intended to reduce the potential impacts to below a level of significance.

9.1 Sensitive Upland Vegetation Communities

Mitigation for impacts to sensitive upland vegetation (non-native grassland) will be accomplished through payment into to the City's Habitat Acquisition Fund (City of San Diego 2018). Per the City's 2018 Biology Guidelines and ESL regulations, mitigation requirements for sensitive vegetation communities are based on the assumption that the mitigation would take place either inside the MHPA or outside the MHPA. The project mitigation ranges from 0.98 acre to 1.95 acres and is

presented below in Table 6. If mitigation cannot be accomplished within a MHPA preserve, the mitigation ratio would be higher for all community types.

Table 6 Mitigation Requirements for Impacts to Sensitive Upland Vegetation Communities (acres)						
Vegetation Community	ESL Tier	Existing	Impact (outside MHPA)	Mitigation Ratio (inside MHPA)	Mitigation Ratio (outside MHPA)	Total Mitigation Required
Non-Native Grassland	III-B	1.95	1.95	0.5:1	1:1	0.98 to 1.95

9.2 Jurisdictional Waters

Proposed mitigation for impacts to jurisdictional features is summarized in Tables 7a-7c. Mitigation for impacts to CDFW and City jurisdictional waters will be achieved through the purchase of 0.07 acre of Re-established River: Wetland Waters of the U.S./State credits from the San Luis Rey Mitigation Bank to achieve a no-net-loss. A letter from the San Luis Rey Mitigation Bank stating that the mitigation is available to the project is included as Attachment 6. Unavoidable impacts to jurisdictional waters would require a 1602 Permit Authorization from CDFW. All mitigation listed in Table 7b for state waters is subject to the approval of the regulatory agency that authorizes the impacts.

Table 7a Proposed Mitigation for Impacts to USACE/RWQCB Jurisdictional Resources				
Jurisdictional Aquatic Resource	Area (acres)	Impacts (acres)	Mitigation Ratio	Total Mitigation Required (acres)
<i>Non-wetland Waters</i>				
Natural Flood Channel	0.05	0.00	2:1	0.00
<i>Total Non-wetland Waters</i>	<i>0.05</i>	<i>0.00</i>	-	<i>0.00</i>
Total Jurisdictional Area	0.05	0.00	-	0.00

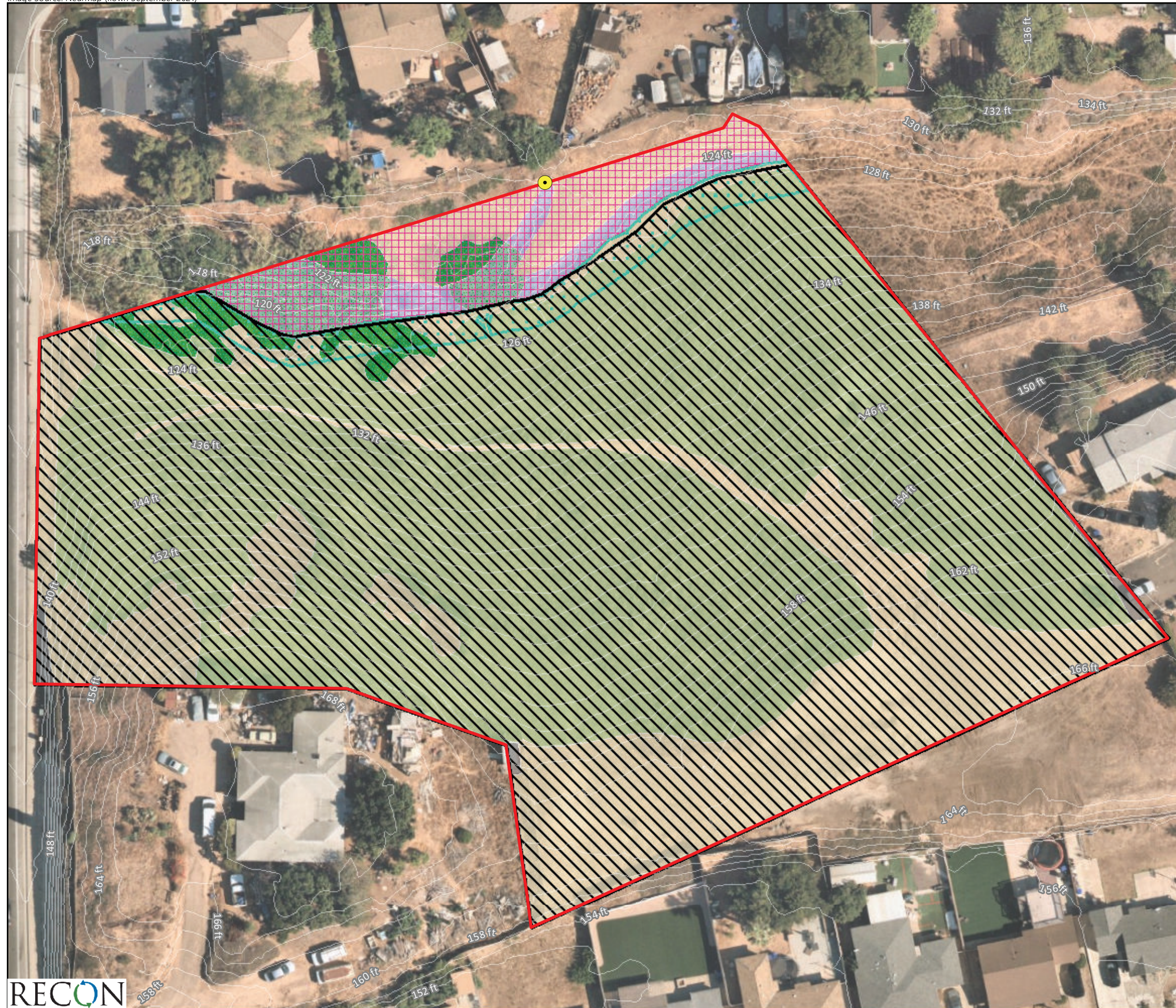
Table 7b Proposed Mitigation for Impacts to CDFW Jurisdictional Wetlands and Streambed				
Jurisdictional Resource	Area (acres)	Impacts (acres)	Mitigation Ratio	Total Mitigation Required (acres)
<i>Wetland or Riparian Areas</i>				
Disturbed Wetland	0.07	0.00	2:1	0.00
Disturbed Riparian	0.07	0.02	2:1	0.04
<i>Total Wetlands/Riparian</i>	<i>0.14</i>	<i>0.00</i>	-	<i>0.04</i>
<i>Non-wetland Waters/Streambed</i>				
Natural Flood Channel	0.05	0.00	2:1	0.00
<i>Total Non-wetland Waters/Streambed</i>	<i>0.05</i>	<i>0.00</i>	-	<i>0.00</i>
Total Jurisdictional Area	0.19	0.02	-	0.04












Table 7c Proposed Mitigation for Impacts to City of San Diego Jurisdictional Wetlands				
Jurisdictional Wetlands	Area (acres)	Impacts (acres)	Mitigation Ratio	Total Mitigation Required (acres)
<i>Wetland or Riparian Areas</i>				
Disturbed Wetland	0.07	0.00	2:1	0.00
Disturbed Riparian	0.04	0.02	2:1	0.04
Disturbed Riparian (within the wetland buffer only)	0.03	0.03	1:1	0.03
<i>Total Wetlands/Riparian</i>	<i>0.14</i>	<i>0.00</i>	-	<i>0.07</i>
Total Jurisdictional Area	0.14	0.05	-	0.07

9.3 Protection and Notice Element

The remaining lands between the development footprint and the property boundary (0.24 acre) will be placed in a covenant of easement (Figure 9) per Section 143.0140(a) of the City of San Diego Municipal Code ESL regulation (City of San Diego 2021). These lands will not be used towards mitigation and will be protected from future development. Lastly, no long-term management would be required for these lands.

Additionally, the enhancement and weeding of the disturbed riparian vegetation north of the wetland buffer has been included as a project design feature. As this enhancement effort is not considered as mitigation, there will be no long-term management required.



-  Project Boundary
-  Wetland Buffer
-  Covenant of Easement
-  Impact Footprint
-  Culvert
- Vegetation Community**
-  Disturbed Wetland
-  Disturbed Riparian
-  Natural Flood Channel
-  Non-Native Grassland
-  Disturbed Land
-  Urban/Developed

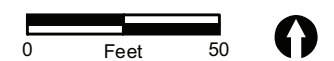


FIGURE 9
On-Site Preservation via
Covenant of Easement

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U.S. Geological Survey

1996 National City Quadrangle and Point Loma Quadrangle, 7.5-Minute Topographic Map.

ATTACHMENTS

ATTACHMENT 1

Plant Species Observed

Attachment 1
Plant Species Observed

Scientific Name	Common Name	Habitat	Origin
ANGIOSPERMS: MONOCOTS			
AGAVACEAE	AGAVE FAMILY		
<i>Chlorogalum parviflorum</i> S. Watson	small-flower soap-plant, amole	dNNG	N
<i>Yucca grandiflora</i>	sahualiqui, large-flowered yucca	DIST	I
CYPERACEAE	SEDGE FAMILY		
<i>Cyperus eragrostis</i> Lam.	tall flatsedge	DIST	N
IRIDACEAE	IRIS FAMILY		
<i>Sisyrinchium bellum</i> S. Watson	western blue-eyed grass	dNNG	N
POACEAE (GRAMINEAE)	GRASS FAMILY		
<i>Arundo donax</i> L.	giant reed	DW	I
<i>Avena</i> sp.	oats	dNNG, DIST	I
<i>Bromus diandrus</i> Roth	ripgut grass	dNNG, DIST	I
<i>Bromus madritensis</i> L. ssp. <i>rubens</i> (L.) Husn.	red brome	dNNG, DIST	I
<i>Cynodon dactylon</i> (L.) Pers.	Bermuda grass	dNNG, DIST	I
<i>Distichlis spicata</i> (L.) Greene	salt grass	dNNG	N
<i>Festuca perennis</i> (L.) Columbus & J.P. Sm. [= <i>Lolium multiflorum</i> and <i>Lolium perenne</i>]	rye grass	dNNG, DIST	I
<i>Stipa</i> [= <i>Nassella</i>] sp.	needle grass	dNNG	N
ANGIOSPERMS: DICOTS			
AIZOACEAE	FIG-MARIGOLD FAMILY		
<i>Carpobrotus edulis</i> (L.) N.E. Br.	freeway iceplant	DIST	I
<i>Malephora crocea</i> (Jacq.) Schwantes	crocea iceplant	DIST	I
<i>Schinus terebinthifolius</i> Raddi	Brazilian pepper tree	DIST, DW	I
<i>Foeniculum vulgare</i> Mill.	fennel	dNNG	I
ASTERACEAE	SUNFLOWER FAMILY		
<i>Baccharis salicifolia</i> (Ruiz & Pav.) Pers. ssp. <i>salicifolia</i>	mule fat, seep-willow	DW	N
<i>Grindelia camporum</i> Greene [= <i>Grindelia camporum</i> var. <i>bracteosa</i>]	gumplant	dNNG	N
<i>Sonchus asper</i> (L.) Hill ssp. <i>asper</i>	prickly sow thistle	DIST	I

Attachment 1
Plant Species Observed

Scientific Name	Common Name	Habitat	Origin
BRASSICACEAE (CRUCIFERAE)	MUSTARD FAMILY		
<i>Raphanus sativus</i> L.	radish	DIST	I
CHENOPODIACEAE	GOOSEFOOT FAMILY		
<i>Atriplex semibaccata</i> R. Br.	Australian saltbush	dNNG, DIST	I
<i>Salsola tragus</i> L.	Russian thistle, tumbleweed	dNNG, DIST	I
CONVOLVULACEAE	MORNING-GLORY FAMILY		
<i>Calystegia macrostegia</i> (Greene) Brummitt	morning-glory	dNNG	N
FABACEAE (LEGUMINOSAE)	LEGUME FAMILY		
<i>Acemisson glaber</i> (Vogel) Brouillet [= <i>Lotus scoparius</i>]	deerweed, California broom	dNNG	N
GERANIACEAE	GERANIUM FAMILY		
<i>Erodium</i> sp.	filaree, storksbill	dNNG	I
MALVACEAE	MALLOW FAMILY		
<i>Malva parviflora</i> L.	cheeseweed, little mallow	DIST	I
PLANTAGINACEAE	PLANTAIN FAMILY		
<i>Plantago erecta</i> E. Morris	dot-seed plantain	dNNG	N
POLYGONACEAE	BUCKWHEAT FAMILY		
<i>Eriogonum fasciculatum</i> Benth. var. <i>fasciculatum</i>	coast California buckwheat	dNNG	N
<i>Persicaria amphibia</i>	knotweed, smartweed	DW	N
HABITATS dNNG = Disturbed non-native grassland DIST = Disturbed land DW = Disturbed wetland	ORIGIN N = Native to locality I = Introduced species from outside locality (I) = Introduced species to the ecoregion in which the survey occurred; however, native to other ecoregions within San Diego County.		

ATTACHMENT 2

Sensitive Plant Species Observed
or with the Potential for Occurrence

Attachment 2

Sensitive Plant Species Observed or with the Potential for Occurrence

Species' <i>Scientific Name</i> Common Name	State/Federal Status	CNPS Rank	City of San Diego	Habitat/ Preference/Requirements/ Blooming Period	Observed?	Basis for Determination of Occurrence Potential
ANGIOSPERMS: DICOTS						
ASTERACEAE SUNFLOWER FAMILY						
<i>Deinandra</i> [= <i>Hemizonia</i>] <i>conjugens</i> Otay tarplant	CE/FT	1B.1	NE, MSCP	Annual herb; clayey soils of coastal scrub openings, valley and foothill grassland; blooms April–June, elevation less than 1,000 feet.	No	This species was not observed and not expected to occur due to the absence of clay soils on-site. This species is known to occur within one mile of the survey area (State of California 2018b).
<i>Lasthenia glabrata</i> <i>ssp. coulteri</i> Coulter's goldfields	–/–	1B.1	–	Annual herb; coastal salt marsh, vernal pools, playas; blooms February–June; elevation less than 4,000 feet.	No	This species was not observed and not expected to occur due to the absence of suitable coastal salt marsh and vernal pool habitat on-site. This species is known to occur within one mile of the survey area (State of California 2018c).
<i>Stylocline citroleum</i> oil nest-straw	–/–	1B.1	–	Annual herb; chenopod scrub; potentially coastal sage scrub, valley and foothill grasslands; clay soils; blooms March–April; elevation less than 1,300 feet. California endemic. Known from San Diego (presumed extirpated) and Kern counties.	No	This species was not observed and not expected to occur due to the absence of scrub and grassland habitats and clay soils on-site. This species is known to occur within one mile of the survey area (State of California 2018c).

Attachment 2

Sensitive Plant Species Observed or with the Potential for Occurrence

Species' <i>Scientific Name</i> Common Name	State/Federal Status	CNPS Rank	City of San Diego	Habitat/ Preference/Requirements/ Blooming Period	Observed?	Basis for Determination of Occurrence Potential
CACTACEAE CACTUS FAMILY						
<i>Ferocactus viridescens</i> San Diego barrel cactus	–/–	2B.1	MSCP	Perennial stem succulent; chaparral, coastal sage scrub, valley and foothill grasslands, vernal pools; blooms May–June; elevation less than 1,500 feet.	No	This species was not observed and not expected to occur due to the absence of scrub and grassland habitats on-site. Additionally, this perennial species would have been apparent during surveys, if present. This species is known to occur within one mile of the survey area (State of California 2018c).
LAMIACEAE MINT FAMILY						
<i>Acanthomintha ilicifolia</i> San Diego thornmint	CE/FT	1B.1	NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	No	This species was not observed and not expected to occur due to the absence of chaparral, coastal sage scrub, and grassland habitats and friable, clay soils on-site. This species is known to occur within one mile of the survey area (State of California 2018b).

Attachment 2

Sensitive Plant Species Observed or with the Potential for Occurrence

Species' Scientific Name Common Name	State/Federal Status	CNPS Rank	City of San Diego	Habitat/ Preference/Requirements/ Blooming Period	Observed?	Basis for Determination of Occurrence Potential
POLEMONIACEAE PHLOX FAMILY						
<i>Navarretia fossalis</i> spreading navarretia [=prostrate navarretia]	-/FT	1B.1	NE, MSCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.	No	This species was not observed and not expected to occur due to the absence of vernal pool and other suitable habitats. This species is known to occur within one mile of the survey area (State of California 2018b).
RHAMNACEAE BUCKTHORN FAMILY						
<i>Adolphia californica</i> California adolphia	-/-	2B.1	-	Perennial deciduous shrub; Diegan coastal sage scrub and chaparral; clay soils; blooms December–May; elevation 100–2,500 feet.	No	This species was not observed and not expected to occur due to the absence of scrub and grassland habitats and clay soils on-site. Additionally, this perennial species would have been apparent during surveys, if present. This species is known to occur within one mile of the survey area (State of California 2018).

Attachment 2

Sensitive Plant Species Observed or with the Potential for Occurrence

Species' <i>Scientific Name</i> Common Name	State/Federal Status	CNPS Rank	City of San Diego	Habitat/ Preference/Requirements/ Blooming Period	Observed?	Basis for Determination of Occurrence Potential
FEDERAL CANDIDATES AND LISTED PLANTS				STATE LISTED PLANTS		
FE	=	Federally listed endangered		CE	=	State listed endangered
FT	=	Federally listed threatened		CR	=	State listed rare
FC	=	Federal candidate for listing as endangered or threatened		CT	=	State listed threatened
CALIFORNIA NATIVE PLANT SOCIETY (CNPS): CALIFORNIA RARE PLANT RANKS (CRPR)						
1A	=	Species presumed extinct.				
1B	=	Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.				
2A	=	Plants presumed extirpated in California, but more common elsewhere.				
2B	=	Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.				
3	=	Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.				
4	=	A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.				
.1	=	Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).				
.2	=	Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).				
.3	=	Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known).				
CBR	=	Considered but rejected				
CITY OF SAN DIEGO						
NE	=	Narrow endemic				
MSCP	=	Multiple Species Conservation Program covered species				

ATTACHMENT 3

Sensitive Wildlife Species Occurring
or with the Potential to Occur

Attachment 3 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
REPTILES (Nomenclature from Crother et al. 2008)					
TEIIDAE WHIPTAIL LIZARDS					
Belding's orange-throated whiptail <i>Aspidoscelis hyperythra beldingi</i>	CSC, MSCP	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.	No	None	This species was not observed and not expected to occur due to the lack of chaparral and coastal sage scrub habitat. This species is known to occur within one mile of the survey area (State of California 2018e).
BIRDS (Nomenclature from American Ornithological Society Checklist (Chesser et al. 2018) and Unitt 2004)					
Western burrowing owl (burrow sites) <i>Athene cunicularia hypugaea</i>	CSC, MSCP	Grassland, agricultural land, coastal dunes. Require rodent burrows. Declining resident.	No	None	This species was not observed and not expected to occur due to the proximity to urban development and lack of suitable conditions, including burrows on-site. This species is known to occur within one mile of the survey area (State of California 2018e).
VIREONIDAE VIREOS					
Least Bell's vireo (nesting) <i>Vireo bellii pusillus</i>	FE, CE, MSCP	Willow riparian woodlands. Summer resident.	No	None	This species was not observed and not expected to occur due to the high level of disturbance within the disturbed wetland and lack of multi-tiered riparian habitat. This species is known to occur within one mile of the survey area (State of California 2018d).

Attachment 3
Sensitive Wildlife Species Occurring or with the Potential to Occur

Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
TROGLODYTIDAE WRENS					
Coastal cactus wren <i>Campylorhynchus brunneicapillus sandiegensis</i>	CSC, MSCP, *	Maritime succulent scrub, coastal sage scrub with <i>Opuntia</i> thickets. Rare localized resident.	No	None	This species was not observed and not expected to occur due to the absence of <i>Opuntia</i> and <i>Cylindropuntia</i> thickets on-site. This species is known to occur within one mile of the survey area (State of California 2018e).
SYLVIIDAE GNATCATCHERS					
Coastal California gnatcatcher <i>Polioptila californica californica</i>	FT, CSC, MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	No	None	This species was not observed and not expected to occur due to the lack of chaparral and coastal sage scrub habitat. This species is known to occur within one mile of the survey area (State of California 2018d).
TURDIDAE THRUSHES					
Western bluebird <i>Sialia mexicana occidentalis</i>	MSCP	Open woodlands, farmlands, orchards.	Yes	Observed	This species was observed foraging over the disturbed non-native grassland.

(I) = Introduced species
STATUS CODES
Listed/Proposed
FE = Listed as endangered by the federal government
FT = Listed as threatened by the federal government
CE = Listed as endangered by the state of California
Other
CSC = California Department of Fish and Wildlife species of special concern
MSCP = City and County of San Diego Multiple Species Conservation Program covered species
* = Taxa listed with an asterisk fall into one or more of the following categories:

- Taxa considered endangered or rare under Section 15380(d) of CEQA guidelines
- Taxa that are biologically rare, very restricted in distribution, or declining throughout their range
- Population(s) in California that may be peripheral to the major portion of a taxon's range but which are threatened with extirpation within California
- Taxa closely associated with a habitat that is declining in California at an alarming rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands)

ATTACHMENT 4

Wetland/Waters Delineation Report for the
Euclid Terrace Project, San Diego, California



Wetland/Waters Delineation Report for the
Euclid Terrace Project
San Diego, California

Prepared for

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RECON Number 9215
March 22, 2022

A handwritten signature in black ink that reads "Gerry Scheid".

Gerry Scheid, Senior Biologist

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ATTACHMENT

1: Wetland and Ordinary High Water Mark Data Sheets

Acronyms and Abbreviations

USACE	U.S. Army Corps of Engineers
CDFW	California Department of Fish and Wildlife
CWA	Clean Water Act
FAC	facultative
FACU	facultative upland
FACW	facultative wet
OBL	obligate
RWQCB	Regional Water Quality Control Board
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey

1.0 Summary of Findings

RECON Environmental, Inc. (RECON) biologists performed a routine wetland/waters delineation on an approximately 3.0-acre Euclid Terrace Project Site (survey area) located within in the city of San Diego, California. Methods for delineating wetlands followed guidelines set forth by the U.S. Army Corps of Engineers (USACE; 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008).

USACE federal waters of the U.S., California Regional Water Quality Control Board (RWQCB) waters of the state, and California Department of Fish and Wildlife (CDFW) streambed, were all delineated within the project area. USACE non-wetland waters total 0.12 acre on-site. No USACE wetlands occur on-site. RWQCB jurisdictional waters of the state mapped on-site total 0.12 acre of non-wetland waters. CDFW state waters on the site include 0.07 acre of disturbed wetland, 0.05 acre streambed, and 0.07 acre disturbed riparian. City of San Diego wetlands on-site include 0.07 acre of disturbed wetland and 0.07 acre of disturbed riparian.

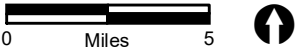
Verification of this wetland/waters delineation will occur during the permitting process, if required. Under a no-net-loss to wetlands policy, the agencies will require that impacts be avoided and minimized to the greatest extent practicable, and that any unavoidable impacts be mitigated.

2.0 Introduction

This report describes the results of a wetland/waters delineation conducted on the approximately 3.0-acre survey area, located in the southern portion of the city of San Diego, California (Figure 1). The survey area is in the city of San Diego, east of Interstate 805, and immediately east of South Euclid Avenue (see Figure 1). The survey area is found on the Mission San Diego Land Grant, of the U.S. Geological Survey (USGS) 7.5-minute topographic map, National City quadrangle (Figure 2; USGS 1996). An aerial photograph of the survey area is shown on Figure 3.

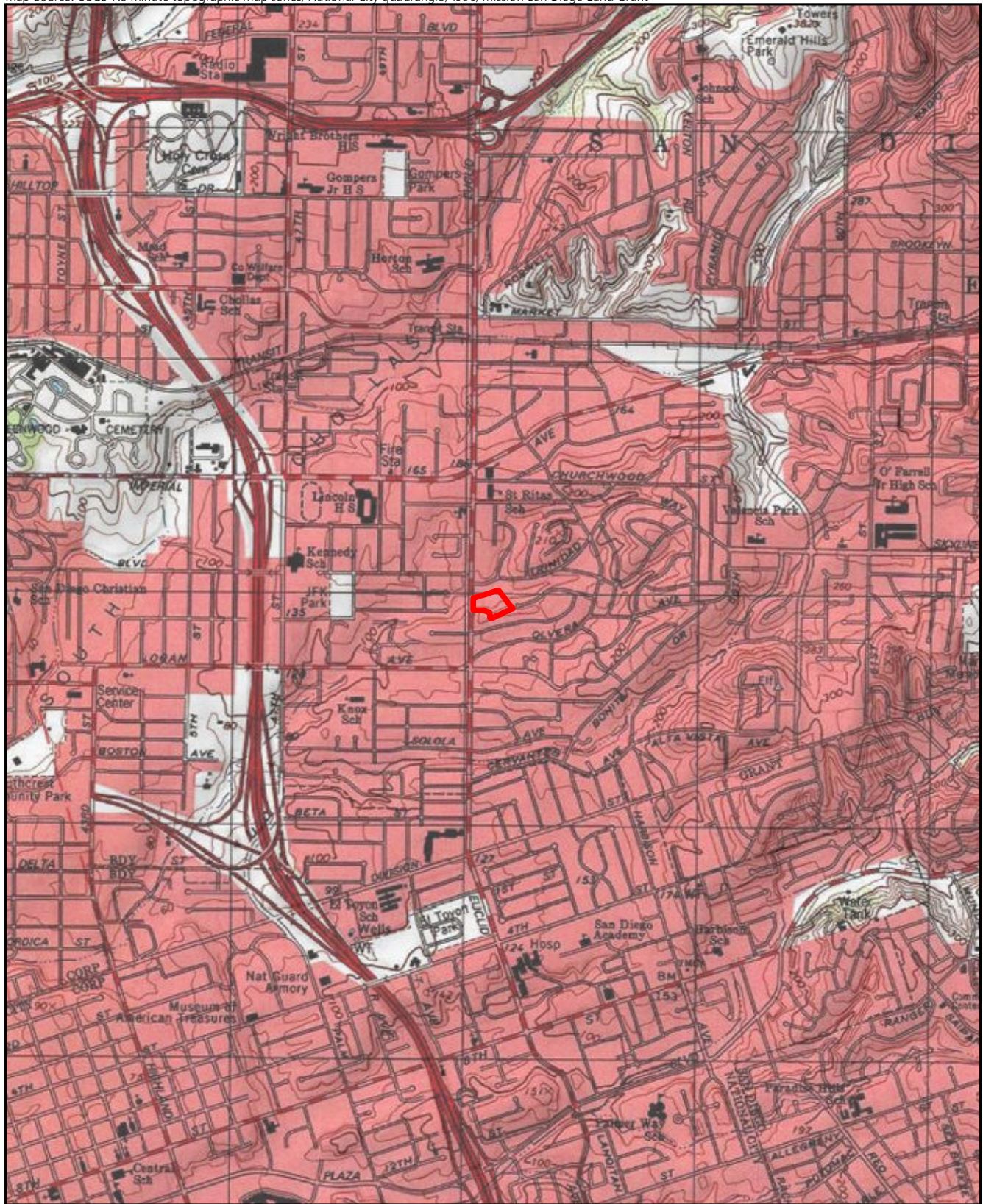
The survey area includes a flat mesa located on the southern end of the site and a north-facing slope area whose elevation decreases to the north of the site. Two drainage courses are present within the northern portion of the parcel; one the runs the length of the northern boundary of the site and a short tributary drainage that enters the site from a culvert outlet near the center of the north boundary. Upland areas of the site support a mixture of non-native grassland and disturbed land.

Included in this report is the wetland/waters delineation data that can be used for a jurisdictional determination by the USACE, CDFW/RWQCB, and the City of San Diego. Review and approval of the jurisdictional waters delineation would occur during the permit process, if required, for each agency.



 Project Location

FIGURE 1
Regional Location



 Project Boundary

FIGURE 2
Project Location on USGS Map

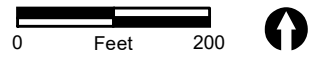


FIGURE 3
Project Location on Aerial Photograph

3.0 Methods

RECON biologists performed a routine wetland/waters delineation within the survey area on June 22, 2021, according to the guidelines set forth by USACE (1987, 2008). A wetland/waters delineation is used to identify and map the extent of the wetland and non-wetland waters of the U.S. and provide information regarding jurisdictional regulation of these waters. Prior to conducting the delineation, an aerial photograph and the USGS National City quadrangle were examined to aid in the determination of potential waters of the U.S. on-site. Once on-site, the survey area was examined to determine the presence of any indicators of wetlands, including wetland vegetation, hydric soils, and hydrology. Soil test pits were located (1) within potential wetland areas and (2) in or adjacent to the spot where the boundary between wetland and upland was inferred (based on changes in the topography, hydrology, and composition of the vegetation). While in the field, the survey area was also examined for potential waters of the state and City of San Diego wetlands.

3.1 USACE Wetland Delineation Parameters

Wetlands are delineated using three parameters: hydrophytic vegetation, wetland hydrology, and hydric soils. According to USACE guidelines, indicators for all three parameters must be present to qualify as a wetland. Non-wetland waters are delineated by determining the extent of the ordinary high water mark (OHM).

3.1.1 Hydrophytic Vegetation

Hydrophytic vegetation is defined as “the sum total of macrophytic plant life growing in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content” (USACE 1987). The potential wetland areas within the survey area were surveyed by walking through the project site and making observations of those areas exhibiting characteristics of wetland or non-wetland waters. Vegetation units with hydrophytic plant species were examined, and data for each vegetation stratum (i.e., tree, shrub, herb, and vine) were recorded on the datasheet provided in the 2008 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (hereafter referred to as ‘Arid Supplement’) (USACE 2008). The percent absolute cover of each species present was visually estimated and recorded.

The wetland indicator status of each species observed at a sample location was determined by using the list of wetland plants for the arid southwest provided by the USACE (2013). An obligate (OBL) indicator status refers to plants that have a 99 percent probability of occurring in wetlands under natural conditions. A facultative wet (FACW) indicator status refers to plants that occur in wetlands (67 to 99 percent probability), but are occasionally found in non-wetlands. A facultative (FAC) indicator status refers to plants that are equally likely to occur in wetlands or non-wetlands (estimated probability 34 to 66 percent). Facultative upland (FACU) species are more often found in upland sites. Upland (UPL) species have a high probability to occur in upland sites.

3.1.2 Hydric Soils

A hydric soil is a soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions that favor the growth and regeneration of hydrophytic vegetation (USACE 1987). Hydric soil indicators are formed predominantly by the accumulation or loss of iron, manganese, sulfur, or carbon compounds (USACE 2008). The hydric soil criterion is considered fulfilled at a location if soils in the area can be inferred to have a high groundwater table, evidence of prolonged soil saturation exists, or any indicators suggesting a long-term reducing environment in the upper 18 inches of the soil profile are present.

Sample points were generally selected within a potential wetland area near where the apparent boundary between wetland and upland was inferred based on changes in the composition of the vegetation and topography. A soil pit was dug to determine soil color, evidence of soil saturation, depth to groundwater, and indicators of a reducing soil environment (e.g., mottling, gleying, and sulfidic odor).

3.1.3 Hydrology

The presence of wetland hydrology indicators confirm that inundation or saturation has occurred on a site, but may not provide information about the timing, duration, or frequency of the event. Hydrology features are generally the most ephemeral of the three wetland parameters (USACE 2008).

In the 2008 *Arid Supplement*, wetland hydrology indicators are divided into four groups. Those that are determined based on direct observation are in Group A. These include the presence of surface water, a high-water table, and saturation. Water marks, drift deposits, surface soil cracks, and other indicators of flooding or ponding fall within Group B. Group C consists of indicators that provide indirect evidence that a site was saturated recently, such as the presence of sulfidic odors or oxidized rhizospheres along living roots. Group D consists of vegetation and soil features that indicate recent wet conditions, such as the FAC-neutral test or a shallow aquitard (USACE 2008). These indicators are further classified as primary or secondary indicators.

Hydrologic information for the site was, in general, obtained by reviewing USGS topographic maps, and specifically, by direct observing of hydrology indicators in the field. The wetland hydrology criterion is considered fulfilled at a location if, based upon the conclusions inferred from the field observations, an area has a high probability of being periodically inundated or has soils saturated to the surface at some time during the growing season to develop anaerobic conditions in the surface soil environment, especially the root zone (USACE 1987). If at least one primary indicator or at least two secondary indicators are found at a sample point, the wetland hydrology criterion is considered fulfilled.

3.2 USACE Non-Wetland Waters Delineation Parameters

The USACE also requires the delineation of areas that qualify as non-wetland waters of the U.S. These waters must have strong hydrology indicators such as the presence of seasonal flows and an ordinary high watermark. An ordinary high watermark is defined as:

... that line on the shore established by the fluctuations of water and indicated by physical characteristics such as [a] clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (33 Code of Federal Regulations Part 328.3).

Areas delineated as non-wetland waters may lack wetland vegetation or hydric-soil characteristics. Hydric-soil indicators may be missing because topographic position precludes ponding and subsequent development of hydric soils. Absence of wetland vegetation can result from frequent scouring due to rapid water flow. These types of jurisdictional waters are delineated by the lateral and upstream/downstream extent of the ordinary high watermark of the particular drainage or depression.

3.3 RWQCB Waters of the State

RWQCB is the regional agency responsible for protecting water quality in California. The jurisdiction of this agency includes all waters of the U.S. and waters of the state as mandated by both the federal Clean Water Act (CWA) Section 401 and the California Porter-Cologne Water Quality Control Act. Waters of the state are delineated according to the USACE methodology but may extend beyond those limits or include other areas in certain situations.

3.4 CDFW State Waters

Under Sections 1600–1607 of the Fish and Game Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over wetland habitats (e.g., southern willow scrub) and adjacent riparian habitat associated with watercourses. Jurisdictional waters are delineated by the outer edge of wetland vegetation, riparian habitat, or at the top of the bank of streams or lakes, whichever is wider.

3.5 City of San Diego Wetlands

According to the City of San Diego's Municipal Code (City of San Diego 2018), wetlands are areas which are characterized by any of the following conditions:

- Areas supporting naturally occurring wetland vegetation communities with a predominance of hydrophytic plant species.

- Areas lacking naturally occurring wetland vegetation communities that have hydric soils or wetland hydrology still present and past human activities have occurred to remove historic vegetation, or catastrophic or recurring natural events preclude the establishment of wetland vegetation.
- Seasonal drainages that have wetland dependent vegetation present in the drainage or lacking due to human activities.
- Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previous existing wetlands.
- Areas that contain wetland vegetation, soils, or hydrology created by human activities in historically non-wetland areas where they have been delineated as wetland by USACE and/or CDFW.
- Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

4.0 Delineation Data Summary

A description of the vegetation, soil types encountered, and a discussion of the local hydrology for the site based on observations and data collected at the sample points is provided below. Copies of the field data forms summarizing information on hydrophytic vegetation, hydric soils, and wetland hydrology indicators observed at each sample location are provided in Attachment 1.

4.1 Hydrophytic Vegetation



Areas on the site dominated by hydrophytic vegetation occur in the northwest portion of the site along the main drainage course. The hydrophytic vegetation is comprised of dense stands of giant reed (*Arundo donax*; FACW). The density of the giant cane is as high as 100 percent in some portions of the main drainage. Scattered individuals of mule fat (*Baccharis salicifolia*; FAC) occur within the non-native species and in more open areas, small patches of smartweed (*Persicaria amphibia*; OBL) were observed.

The non-native grassland, disturbed land, and developed land portions of the site adjacent to the drainage courses are dominated by upland plant species and do not satisfy the hydrophytic vegetation criteria.

4.2 Hydric Soils

One soil series is present on-site: Huerhuero loam, 15 to 30 percent slopes, eroded (U.S. Department of Agriculture [USDA] 1973; Figure 4). Six soil test pits were dug at various locations within the site. No hydric soil indicators were observed within these soil pits.



-  Project Boundary
-  Huerhuero loam
15 to 30 percent slopes, eroded

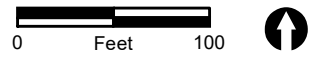


FIGURE 4
Soil Types within the Euclid
Terrace Project Survey Area

4.3 Wetland Hydrology

Two drainage courses run through the survey area. Water drains from the landscape and housing development to the north and east from storm and dry season urban runoff which ultimately flows into the on-site drainages. The drainage channel varies in width and depth depending on the amount of vegetation and meander. The shorter drainage enters the site from the north from a culvert adjacent to northern perimeter of the site. This culvert appears to be part of a storm drain system that conveys runoff from the housing development north of the survey area. The longer drainage is fed by storm and urban-runoff discharged from a culvert outlet from the housing development to the east.

The majority of the water that enters the site comes as storm water runoff during the wet season. Smaller dry season flows may enter the site due to irrigation and other urban runoff sources. The two drainages converge near the eastern boundary of the hydrophytic vegetation (giant reed). The drainage course then continues off-site through a culvert into the storm drain system, which is assumed to eventually reach the Pacific Ocean.

Although one secondary wetland hydrology indicators (sediment deposits) was observed in the longer drainage course, neither one of these two drainages are considered to meet in the wetland hydrology criteria as flows are low frequency, relatively low volume, of short duration, and ephemeral.

5.0 Delineation Results

The locations of USACE federal waters of the U.S./RWQCB waters of the state, CDFW state waters, and City wetlands are shown on Figures 5, 6, and 7, respectively. The acreages of these waters is given in Table 1 by jurisdiction. A brief discussion of wetlands/waters for each jurisdiction is provided below.

Table 1 Acreage of Wetland and Non-wetland Waters On-site		
Agency	Wetland and Non-wetland Waters	Acres
Waters of the U.S. (USACE)	Wetland	0
	Non-wetland Water	0.12
	Total Waters of the U.S.	0.12
Waters of the State (RWQCB)	Wetland	0
	Non-wetland Water	0.12
	Total Waters of the State	0.12
CDFW State Waters	Disturbed Wetland	0.07
	Streambed	0.05
	Disturbed Riparian	0.07
	Total State Waters	0.19
City of San Diego	Disturbed Wetland	0.07
	Disturbed Riparian	0.07
	Total City Wetland	0.14



- Project Boundary
- USACE/RWQCB Non-wetland Waters
- Sample Point
- Culvert

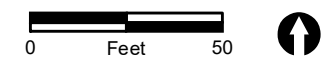







FIGURE 5
Waters of the U.S. and Waters of the State
within the Euclid Terrace Project



-  Project Boundary
-  CDFW Disturbed Riparian
-  CDFW Disturbed Wetland
-  CDFW Streambed
-  Culvert

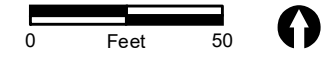


FIGURE 6
CDFW State Waters within
the Euclid Terrace Project



-  Project Boundary
-  City Wetland



FIGURE 7
City of San Diego Wetland
within the Euclid Terrace Project

5.1 Federal Waters of the U.S.

USACE federal waters of the U.S. on-site include only non-wetland waters. The limit of the non-wetland waters was estimated by observations and measurements of the ordinary high water mark. The USACE non-wetland waters occur along northern survey area boundary and include the main drainage and the shorter tributary drainage that enters the parcel from a culvert near the northern perimeter (see Figure 5). These non-wetland waters lack indicators of hydric soils and wetland hydrology. Hydrophytic vegetation only occurs in the western portion of the main drainage course and this vegetation appears to be supported by deeper ground water sources as the upper twelve to eighteen inches of the soil profile did not contain indicators of prolonged saturation. Areas outside of the banks of the drainage channel in the western portion of the site are beyond the limits of the ordinary high water mark and lack hydric soils and wetland hydrology (see Figure 5, sample point 7). Hydrophytic vegetation that occurs here is not naturally occurring and is comprised of lateral vegetative spread of giant reed from within the drainage channel.

5.2 Waters of the State

Waters of the state under the jurisdiction of RWQCB occur on-site as non-wetland waters (see Figure 5). The non-wetland waters occur within the drainage channels and are the same as USACE non-wetland waters discussed above.

5.3 CDFW State Waters

Areas considered disturbed wetland under CDFW include those portions within the banks of the stream course that are vegetated with giant reed (see Figure 6). CDFW streambed includes those portions within the banks of the stream course that do not support hydrophytic vegetation. CDFW disturbed riparian habitat on-site includes those areas of giant reed outside of the bed and bank of the stream course.

5.4 City of San Diego Wetlands

City of San Diego wetlands occur on the site where CDFW disturbed wetlands and disturbed riparian were delineated within the stream course (see Figure 7).

6.0 Regulatory Issues

Wetlands and non-wetland waters are regulated by federal, state, and local governments under a no-net-loss policy, and all impacts are considered significant and should be avoided to the greatest extent possible. Unavoidable and authorized impacts would require mitigation through habitat creation, enhancement, or preservation as determined by a qualified restoration biologist in consultation with the regulatory agencies during the permitting process. Any impacts to USACE, CDFW, and RWQCB jurisdictional wetlands/waters would require a Section 404 permit authorization

from USACE, a 1600 Streambed Alteration Agreement from CDFW, and a 401 State Water Quality Certification from RWQCB, along with compensatory mitigation.

7.0 References Cited

U.S. Army Corps of Engineers (USACE)

1987 Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, Department of the Army. January.

2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region.

2013 National Wetland Plant List: http://wetland_plants.usace.army.mil

U.S. Department of Agriculture (USDA)

1973 Soil Survey, San Diego Area, California. Soil Conservation Service and Forest Service. Roy H. Bowman, ed. San Diego. December.

U.S. Geological Survey (USGS)

1996 National City Quadrangle 7.5-Minute Topographic Map.

ATTACHMENT 1

Wetland and Ordinary High Water Mark Data Sheets

Arid West Ephemeral and Intermittent Streams OTHM Datasheet

#1

Project: <i>Euclid Terrace</i> Project Number: <i>9215</i> Stream: <i>Unnamed</i> Investigator(s): <i>G. Scheid</i>	Date: <i>6/22/21</i> Town: <i>San Diego</i> Photo begin file#:	Time: <i>10:00 am</i> State: <i>CA</i> Photo end file#:
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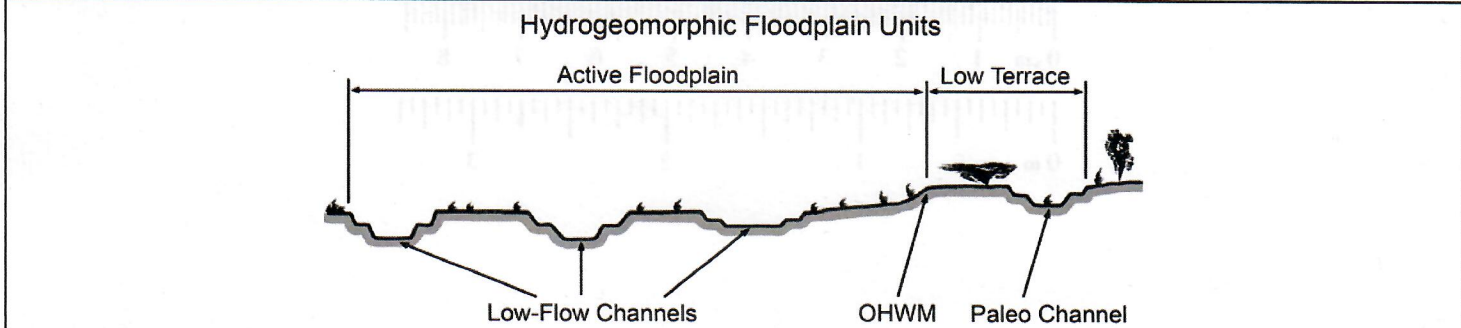
Y <input checked="" type="checkbox"/> / N <input type="checkbox"/> Do normal circumstances exist on the site? Y <input type="checkbox"/> / N <input checked="" type="checkbox"/> Is the site significantly disturbed?	Location Details: <i>Urban drainage in City of San Diego</i> Projection: <i>State Plane</i> Datum: <i>NAD 83</i> Coordinates: <i>32.7dd lat. -117.084dd long.</i>
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Potential anthropogenic influences on the channel system:
Urban runoff, trash, homeless camps.

Brief site description: *Drainage course is remnant segment still above ground within a developed urban area.*

Checklist of resources (if available):

<input checked="" type="checkbox"/> Aerial photography Dates: <i>May 2021</i> <input checked="" type="checkbox"/> Topographic maps <input type="checkbox"/> Geologic maps <input checked="" type="checkbox"/> Vegetation maps <input checked="" type="checkbox"/> Soils maps <input type="checkbox"/> Rainfall/precipitation maps <input type="checkbox"/> Existing delineation(s) for site <input type="checkbox"/> Global positioning system (GPS) <input type="checkbox"/> Other studies	<input type="checkbox"/> Stream gage data Gage number: Period of record: <input type="checkbox"/> History of recent effective discharges <input type="checkbox"/> Results of flood frequency analysis <input type="checkbox"/> Most recent shift-adjusted rating <input type="checkbox"/> Gage heights for 2-, 5-, 10-, and 25-year events and the most recent event exceeding a 5-year event
--	---



- Procedure for identifying and characterizing the floodplain units to assist in identifying the OTHM:**
1. Walk the channel and floodplain within the study area to get an impression of the geomorphology and vegetation present at the site.
 2. Select a representative cross section across the channel. Draw the cross section and label the floodplain units.
 3. Determine a point on the cross section that is characteristic of one of the hydrogeomorphic floodplain units.
 - a) Record the floodplain unit and GPS position.
 - b) Describe the sediment texture (using the Wentworth class size) and the vegetation characteristics of the floodplain unit.
 - c) Identify any indicators present at the location.
 4. Repeat for other points in different hydrogeomorphic floodplain units across the cross section.
 5. Identify the OTHM and record the indicators. Record the OTHM position via:

<input checked="" type="checkbox"/> Mapping on aerial photograph	<input checked="" type="checkbox"/> GPS
<input checked="" type="checkbox"/> Digitized on computer	<input type="checkbox"/> Other:

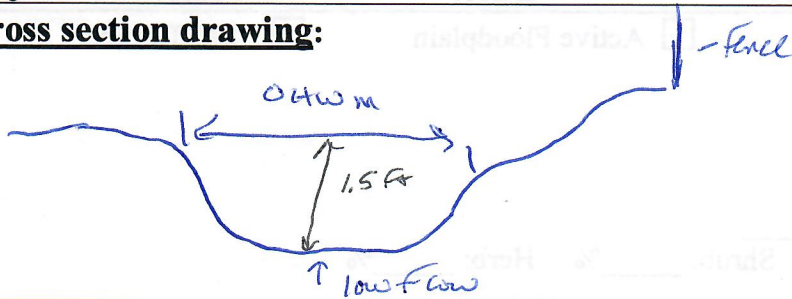
Project ID:

Cross section ID:

Date:

Time:

Cross section drawing:



OHWM

GPS point: ^{Lat.} 32.7 dd ^{Long.} -117.084 dd

Indicators:

- | | |
|---|---|
| <input type="checkbox"/> Change in average sediment texture | <input checked="" type="checkbox"/> Break in bank slope |
| <input type="checkbox"/> Change in vegetation species | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Change in vegetation cover | <input type="checkbox"/> Other: _____ |

Comments:

Floodplain unit: Low-Flow Channel Active Floodplain Low Terrace

GPS point: Lat. 32.7 dd Long. -117.084 dd

Characteristics of the floodplain unit:

Average sediment texture: Loam
 Total veg cover: 100 % Tree: 0 % Shrub: 0 % Herb: 100 %
 Community successional stage:

- | | |
|--|--|
| <input type="checkbox"/> NA | <input type="checkbox"/> Mid (herbaceous, shrubs, saplings) |
| <input checked="" type="checkbox"/> Early (herbaceous & seedlings) | <input type="checkbox"/> Late (herbaceous, shrubs, mature trees) |

Indicators:

- | | |
|--|---|
| <input type="checkbox"/> Mudcracks | <input type="checkbox"/> Soil development |
| <input type="checkbox"/> Ripples | <input type="checkbox"/> Surface relief |
| <input type="checkbox"/> Drift and/or debris | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> Presence of bed and bank | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Benches | <input type="checkbox"/> Other: _____ |

Comments:

*Urban drainage course, isolated by development.
 Short above ground segment.*

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 2
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): gully Local relief (concave, convex, none): concave Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.699793 Long: -117.083808 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? no Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: <u>Vegetation dominated by non-native grasses.</u>	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. <u>none</u>				Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>50</u> (A/B)
2. _____				
3. _____				
4. _____				
_____ = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species <u>60</u> x 3 = <u>180</u> FACU species _____ x 4 = _____ UPL species <u>40</u> x 5 = <u>200</u> Column Totals: <u>100</u> (A) <u>380</u> (B) Prevalence Index = B/A = <u>3.8</u>
Sapling/Shrub Stratum (Plot size: _____)				
1. <u>none</u>				
2. _____				
3. _____				
4. _____				
5. _____				
_____ = Total Cover				
Herb Stratum (Plot size: _____)				
1. <u>Festuca perenne</u>	<u>60</u>	<u>Y</u>	<u>FAC</u>	
2. <u>Avena barbata</u>	<u>30</u>	<u>Y</u>	<u>UPL</u>	
3. <u>Raphanus sativus</u>	<u>10</u>	<u>N</u>	<u>UPL</u>	
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
_____ = Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. <u>none</u>				
2. _____				
_____ = Total Cover				
% Bare Ground in Herb Stratum <u>0</u> % Cover of Biotic Crust <u>0</u>				
Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)				
¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.				
Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Remarks:				

SOIL

Sampling Point: 2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-14	10YR3/3	100	-	-	-	-	loam	
14-16	10YR 3/3	98	5YR 6/8	2	RM	M	loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils³:
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 1 cm Muck (A9) (LRR C)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> 2 cm Muck (A10) (LRR B)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1)	<input type="checkbox"/> Reduced Vertic (F18)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Stratified Layers (A5) (LRR C)	<input type="checkbox"/> Depleted Matrix (F3)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> 1 cm Muck (A9) (LRR D)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Vernal Pools (F9)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)		

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <u>X</u>
--	--

Remarks: Although a low percentage of redox features were observed, these occurred below 10 cm and therefore the soils do not meet the hydric soil criteria.

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (2 or more required)
Primary Indicators (minimum of one required; check all that apply)	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water Marks (B1) (Riverine)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Sediment Deposits (B2) (Riverine)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Drift Deposits (B3) (Riverine)
<input type="checkbox"/> Water Marks (B1) (Nonriverine)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Sediment Deposits (B2) (Nonriverine)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Drift Deposits (B3) (Nonriverine)	<input type="checkbox"/> Thin Muck Surface (C7)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Biotic Crust (B12)	
<input type="checkbox"/> Aquatic Invertebrates (B13)	
<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	
<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	
<input type="checkbox"/> Presence of Reduced Iron (C4)	
<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	
<input type="checkbox"/> Thin Muck Surface (C7)	
<input type="checkbox"/> Other (Explain in Remarks)	

Field Observations:	Wetland Hydrology Present?
Surface Water Present? Yes _____ No <u>X</u> Depth (inches): _____	Yes _____ No <u>X</u>
Water Table Present? Yes _____ No <u>X</u> Depth (inches): _____	
Saturation Present? Yes _____ No <u>X</u> Depth (inches): _____ (includes capillary fringe)	

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No wetland hydrology indicators observed within the ephemeral drainage channel.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 3
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): concave Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.699793 Long: -117.083808 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? no Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: <u>Vegetation dominated by non-native grasses.</u>	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>none</u>				Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
2. _____				
3. _____				
4. _____				
		= Total Cover		
Sapling/Shrub Stratum (Plot size: _____)				
1. <u>none</u>				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species <u>10</u> x 3 = <u>30</u> FACU species _____ x 4 = _____ UPL species <u>90</u> x 5 = <u>450</u> Column Totals: <u>100</u> (A) <u>480</u> (B) Prevalence Index = B/A = <u>4.8</u>
2. _____				
3. _____				
4. _____				
5. _____				
		= Total Cover		
Herb Stratum (Plot size: _____)				
1. <u>Festuca perenne</u>	<u>10</u>	<u>N</u>	<u>FAC</u>	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. <u>Avena barbata</u>	<u>50</u>	<u>Y</u>	<u>UPL</u>	
3. <u>Bromus diandrus</u>	<u>40</u>	<u>Y</u>	<u>UPL</u>	
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
	<u>100</u>	= Total Cover		
Woody Vine Stratum (Plot size: _____)				
1. <u>none</u>				Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
2. _____				
		= Total Cover		
% Bare Ground in Herb Stratum <u>0</u>		% Cover of Biotic Crust <u>0</u>		

Remarks:

SOIL

Sampling Point: 3

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-14	10YR3/3	100	-	-	-	-	loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.) <input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Sandy Redox (S5) <input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Stripped Matrix (S6) <input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Loamy Mucky Mineral (F1) <input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Loamy Gleyed Matrix (F2) <input type="checkbox"/> Stratified Layers (A5) (LRR C) <input type="checkbox"/> Depleted Matrix (F3) <input type="checkbox"/> 1 cm Muck (A9) (LRR D) <input type="checkbox"/> Redox Dark Surface (F6) <input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Depleted Dark Surface (F7) <input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Redox Depressions (F8) <input type="checkbox"/> Sandy Mucky Mineral (S1) <input type="checkbox"/> Vernal Pools (F9) <input type="checkbox"/> Sandy Gleyed Matrix (S4)	Indicators for Problematic Hydric Soils³: <input type="checkbox"/> 1 cm Muck (A9) (LRR C) <input type="checkbox"/> 2 cm Muck (A10) (LRR B) <input type="checkbox"/> Reduced Vertic (F18) <input type="checkbox"/> Red Parent Material (TF2) <input type="checkbox"/> Other (Explain in Remarks)
--	--

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <u>X</u>
--	--

Remarks: No hydric soil indicators observed.

HYDROLOGY

Wetland Hydrology Indicators: <u>Primary Indicators (minimum of one required; check all that apply)</u> <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Salt Crust (B11) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Biotic Crust (B12) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Aquatic Invertebrates (B13) <input type="checkbox"/> Water Marks (B1) (Nonriverine) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3) <input type="checkbox"/> Drift Deposits (B3) (Nonriverine) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Other (Explain in Remarks)	Secondary Indicators (2 or more required) <input type="checkbox"/> Water Marks (B1) (Riverine) <input type="checkbox"/> Sediment Deposits (B2) (Riverine) <input type="checkbox"/> Drift Deposits (B3) (Riverine) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> FAC-Neutral Test (D5)
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Field Observations: Surface Water Present? Yes _____ No <u>X</u> Depth (inches): _____ Water Table Present? Yes _____ No <u>X</u> Depth (inches): _____ Saturation Present? Yes _____ No <u>X</u> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes _____ No <u>X</u>
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No wetland hydrology indicators observed.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 4
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): gully Local relief (concave, convex, none): concave Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.699596 Long: -117.084313 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? yes Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: Sample area dominated by non-native weed species and is subject to impacts from homeless people encampments.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. <u>none</u>				Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>1</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
2. _____				
3. _____				
4. _____				
_____ = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>5</u> x 1 = <u>5</u> FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species <u>95</u> x 5 = <u>475</u> Column Totals: <u>100</u> (A) <u>480</u> (B) Prevalence Index = B/A = <u>4.8</u>
Sapling/Shrub Stratum (Plot size: _____)				
1. <u>none</u>				
2. _____				
3. _____				
4. _____				
5. _____				
_____ = Total Cover				
Herb Stratum (Plot size: _____)				
1. <u>Raphanus sativus</u>	95	Y	UPL	
2. <u>Persicaria amphibia</u>	5	N	OBL	
3. _____				
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
_____ = Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. <u>none</u>				
2. _____				
_____ = Total Cover				
% Bare Ground in Herb Stratum <u>0</u> % Cover of Biotic Crust <u>0</u>				
Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)				
¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.				
Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				

Remarks:

SOIL

Sampling Point: 4

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-12	10YR3/3	100	-	-	-	-	loam	
refusal at 12"								

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)	Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Stratified Layers (A5) (LRR C) <input type="checkbox"/> 1 cm Muck (A9) (LRR D) <input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Sandy Mucky Mineral (S1) <input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Sandy Redox (S5) <input type="checkbox"/> Stripped Matrix (S6) <input type="checkbox"/> Loamy Mucky Mineral (F1) <input type="checkbox"/> Loamy Gleyed Matrix (F2) <input type="checkbox"/> Depleted Matrix (F3) <input type="checkbox"/> Redox Dark Surface (F6) <input type="checkbox"/> Depleted Dark Surface (F7) <input type="checkbox"/> Redox Depressions (F8) <input type="checkbox"/> Vernal Pools (F9)
	<input type="checkbox"/> 1 cm Muck (A9) (LRR C) <input type="checkbox"/> 2 cm Muck (A10) (LRR B) <input type="checkbox"/> Reduced Vertic (F18) <input type="checkbox"/> Red Parent Material (TF2) <input type="checkbox"/> Other (Explain in Remarks)
	³ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <u>X</u>
Remarks: No hydric soil indicators were observed.	

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (2 or more required)
Primary Indicators (minimum of one required; check all that apply)	
<input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Water Marks (B1) (Nonriverine) <input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) <input type="checkbox"/> Drift Deposits (B3) (Nonriverine) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Water Marks (B1) (Riverine) <input type="checkbox"/> Sediment Deposits (B2) (Riverine) <input type="checkbox"/> Drift Deposits (B3) (Riverine) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Salt Crust (B11) <input type="checkbox"/> Biotic Crust (B12) <input type="checkbox"/> Aquatic Invertebrates (B13) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Other (Explain in Remarks)	
Field Observations: Surface Water Present? Yes _____ No <u>X</u> Depth (inches): _____ Water Table Present? Yes _____ No <u>X</u> Depth (inches): _____ Saturation Present? Yes _____ No <u>X</u> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes _____ No <u>X</u>

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No wetland hydrology indicators observed.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 5
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): none Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.699596 Long: -117.084313 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? yes Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: Sample area dominated by non-native weed species and is subject to impacts from homeless people encampments.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. <u>none</u>				Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>1</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
2. _____				
3. _____				
4. _____				
_____ = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species <u>100</u> x 5 = <u>500</u> Column Totals: <u>100</u> (A) <u>500</u> (B) Prevalence Index = B/A = <u>5.0</u>
Sapling/Shrub Stratum (Plot size: _____)				
1. <u>none</u>				
2. _____				
3. _____				
4. _____				
5. _____				
_____ = Total Cover				
Herb Stratum (Plot size: _____)				Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Raphanus sativus</u>	<u>100</u>	<u>Y</u>	<u>UPL</u>	
2. _____				
3. _____				
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
_____ = Total Cover				
Woody Vine Stratum (Plot size: _____)				Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
1. <u>none</u>				
2. _____				
_____ = Total Cover				
% Bare Ground in Herb Stratum <u>0</u> % Cover of Biotic Crust <u>0</u>				

Remarks:

SOIL

Sampling Point: 5

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-18	10YR3/3	100	-	-	-	-	loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils³:
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 1 cm Muck (A9) (LRR C)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> 2 cm Muck (A10) (LRR B)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1)	<input type="checkbox"/> Reduced Vertic (F18)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Stratified Layers (A5) (LRR C)	<input type="checkbox"/> Depleted Matrix (F3)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> 1 cm Muck (A9) (LRR D)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Vernal Pools (F9)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)		

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <u>X</u>
--	--

Remarks: No hydric soil indicators were observed.

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (2 or more required)
Primary Indicators (minimum of one required; check all that apply)	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water Marks (B1) (Riverine)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Sediment Deposits (B2) (Riverine)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Drift Deposits (B3) (Riverine)
<input type="checkbox"/> Water Marks (B1) (Nonriverine)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Sediment Deposits (B2) (Nonriverine)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Drift Deposits (B3) (Nonriverine)	<input type="checkbox"/> Thin Muck Surface (C7)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Biotic Crust (B12)	
<input type="checkbox"/> Aquatic Invertebrates (B13)	
<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	
<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	
<input type="checkbox"/> Presence of Reduced Iron (C4)	
<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	
<input type="checkbox"/> Thin Muck Surface (C7)	
<input type="checkbox"/> Other (Explain in Remarks)	

Field Observations: Surface Water Present? Yes _____ No <u>X</u> Depth (inches): _____ Water Table Present? Yes _____ No <u>X</u> Depth (inches): _____ Saturation Present? Yes _____ No <u>X</u> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes _____ No <u>X</u>
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No wetland hydrology indicators observed.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 6
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): gully Local relief (concave, convex, none): concave Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.69961 Long: -117.084766 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? yes Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: Vegetation dominated by non-native arundo domax. Understory is disturbed due to homeless encampments.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>none</u>				Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>1</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100</u> (A/B)
2. _____				
3. _____				
4. _____				
= Total Cover				
Sapling/Shrub Stratum (Plot size: _____)				
1. <u>Arundo donax</u>	<u>100</u>	<u>Y</u>	<u>FACW</u>	Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species _____ x 5 = _____ Column Totals: _____ (A) _____ (B) Prevalence Index = B/A = _____
2. _____				
3. _____				
4. _____				
5. _____				
= Total Cover				
Herb Stratum (Plot size: _____)				
1. <u>none</u>				Hydrophytic Vegetation Indicators: <input checked="" type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. _____				
3. _____				
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
= Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. <u>none</u>				Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. _____				
= Total Cover				
% Bare Ground in Herb Stratum <u>0</u>		% Cover of Biotic Crust <u>0</u>		

Remarks: Although vegetation is dominated by a FACW species, the undisturbed vegetation would likely be dominated by upland annual grasses and herbaceous non-native weed species based on upstream observations.

SOIL

Sampling Point: 6

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)							
Depth (inches)	Matrix		Redox Features			Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹		
0-8	10YR3/3	100					loam
refusal at 8"							

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)	Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Stratified Layers (A5) (LRR C) <input type="checkbox"/> 1 cm Muck (A9) (LRR D) <input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Sandy Mucky Mineral (S1) <input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Sandy Redox (S5) <input type="checkbox"/> Stripped Matrix (S6) <input type="checkbox"/> Loamy Mucky Mineral (F1) <input type="checkbox"/> Loamy Gleyed Matrix (F2) <input type="checkbox"/> Depleted Matrix (F3) <input type="checkbox"/> Redox Dark Surface (F6) <input type="checkbox"/> Depleted Dark Surface (F7) <input type="checkbox"/> Redox Depressions (F8) <input type="checkbox"/> Vernal Pools (F9)
	<input type="checkbox"/> 1 cm Muck (A9) (LRR C) <input type="checkbox"/> 2 cm Muck (A10) (LRR B) <input type="checkbox"/> Reduced Vertic (F18) <input type="checkbox"/> Red Parent Material (TF2) <input type="checkbox"/> Other (Explain in Remarks)
	³ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes _____ No <u>X</u>
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Remarks: No hydric soil indicators were observed.

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (2 or more required)
Primary Indicators (minimum of one required; check all that apply)	
<input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Water Marks (B1) (Nonriverine) <input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) <input type="checkbox"/> Drift Deposits (B3) (Nonriverine) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Water Marks (B1) (Riverine) <input checked="" type="checkbox"/> Sediment Deposits (B2) (Riverine) <input type="checkbox"/> Drift Deposits (B3) (Riverine) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Salt Crust (B11) <input type="checkbox"/> Biotic Crust (B12) <input type="checkbox"/> Aquatic Invertebrates (B13) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Other (Explain in Remarks)	

Field Observations: Surface Water Present? Yes _____ No <u>X</u> Depth (inches): _____ Water Table Present? Yes _____ No <u>X</u> Depth (inches): _____ Saturation Present? Yes _____ No <u>X</u> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes _____ No <u>X</u>
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: Channel is ephemeral and is dry the majority of any given year.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Euclid Terrace Development Project City/County: San Diego, San Diego County Sampling Date: 06/22/21
 Applicant/Owner: Infill Development State: CA Sampling Point: 7
 Investigator(s): G. Scheid, B. Procsal Section, Township, Range: Mission San Diego Land Grant
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): none Slope (%): 0.2
 Subregion (LRR): LRR-C Lat: 32.69954 Long: -117.084633 Datum: NAD83
 Soil Map Unit Name: Huerhuero loam, 15 to 30 percent slopes, eroded NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? yes Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? no (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: <u>Vegetation dominated by non-native Arundo domax. Understory is diturbed due to homeless encampments.</u>	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. <u>none</u>				Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A)
2. _____				Total Number of Dominant Species Across All Strata: <u>1</u> (B)
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100</u> (A/B)
4. _____				
		= Total Cover		
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet:
1. <u>Arundo donax</u>	95	Y	FACW	Total % Cover of: _____ Multiply by: _____
2. _____				OBL species _____ x 1 = _____
3. _____				FACW species _____ x 2 = _____
4. _____				FAC species _____ x 3 = _____
5. _____				FACU species _____ x 4 = _____
	95		= Total Cover	UPL species _____ x 5 = _____
				Column Totals: _____ (A) _____ (B)
				Prevalence Index = B/A = _____
Herb Stratum (Plot size: _____)				Hydrophytic Vegetation Indicators:
1. <u>none</u>				<input checked="" type="checkbox"/> Dominance Test is >50%
2. _____				<input type="checkbox"/> Prevalence Index is ≤3.0 ¹
3. _____				<input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet)
4. _____				<input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)
5. _____				
6. _____				
7. _____				
8. _____				
			= Total Cover	
Woody Vine Stratum (Plot size: _____)				Hydrophytic Vegetation Present?
1. <u>none</u>				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. _____				
			= Total Cover	
% Bare Ground in Herb Stratum <u>5</u>		% Cover of Biotic Crust <u>0</u>		

Remarks: Although vegetation is dominated by a FACW species, the undisturbed vegetation for this area would likely be annual grasses and non-native weeds based on the condition of adjacent areas.

SOIL

Sampling Point: 7

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-12	10YR3/3	100					loam	
refusal at 12"								

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

<p>Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)</p> <p><input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Sandy Redox (S5)</p> <p><input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Stripped Matrix (S6)</p> <p><input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Loamy Mucky Mineral (F1)</p> <p><input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Loamy Gleyed Matrix (F2)</p> <p><input type="checkbox"/> Stratified Layers (A5) (LRR C) <input type="checkbox"/> Depleted Matrix (F3)</p> <p><input type="checkbox"/> 1 cm Muck (A9) (LRR D) <input type="checkbox"/> Redox Dark Surface (F6)</p> <p><input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Depleted Dark Surface (F7)</p> <p><input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Redox Depressions (F8)</p> <p><input type="checkbox"/> Sandy Mucky Mineral (S1) <input type="checkbox"/> Vernal Pools (F9)</p> <p><input type="checkbox"/> Sandy Gleyed Matrix (S4)</p>	<p>Indicators for Problematic Hydric Soils³:</p> <p><input type="checkbox"/> 1 cm Muck (A9) (LRR C)</p> <p><input type="checkbox"/> 2 cm Muck (A10) (LRR B)</p> <p><input type="checkbox"/> Reduced Vertic (F18)</p> <p><input type="checkbox"/> Red Parent Material (TF2)</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p> <p>³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.</p>
--	---

<p>Restrictive Layer (if present):</p> <p>Type: _____</p> <p>Depth (inches): _____</p>	<p>Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/> _____</p>
---	--

Remarks: No hydric soil indicators were observed.

HYDROLOGY

<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators (minimum of one required; check all that apply)</p> <p><input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Salt Crust (B11)</p> <p><input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Biotic Crust (B12)</p> <p><input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Aquatic Invertebrates (B13)</p> <p><input type="checkbox"/> Water Marks (B1) (Nonriverine) <input type="checkbox"/> Hydrogen Sulfide Odor (C1)</p> <p><input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)</p> <p><input type="checkbox"/> Drift Deposits (B3) (Nonriverine) <input type="checkbox"/> Presence of Reduced Iron (C4)</p> <p><input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)</p> <p><input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Thin Muck Surface (C7)</p> <p><input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Other (Explain in Remarks)</p>	<p>Secondary Indicators (2 or more required)</p> <p><input type="checkbox"/> Water Marks (B1) (Riverine)</p> <p><input type="checkbox"/> Sediment Deposits (B2) (Riverine)</p> <p><input type="checkbox"/> Drift Deposits (B3) (Riverine)</p> <p><input type="checkbox"/> Drainage Patterns (B10)</p> <p><input type="checkbox"/> Dry-Season Water Table (C2)</p> <p><input type="checkbox"/> Thin Muck Surface (C7)</p> <p><input type="checkbox"/> Crayfish Burrows (C8)</p> <p><input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)</p> <p><input type="checkbox"/> Shallow Aquitard (D3)</p> <p><input type="checkbox"/> FAC-Neutral Test (D5)</p>
--	--

<p>Field Observations:</p> <p>Surface Water Present? Yes _____ No <input checked="" type="checkbox"/> _____ Depth (inches): _____</p> <p>Water Table Present? Yes _____ No <input checked="" type="checkbox"/> _____ Depth (inches): _____</p> <p>Saturation Present? Yes _____ No <input checked="" type="checkbox"/> _____ Depth (inches): _____</p> <p>(includes capillary fringe)</p>	<p>Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/> _____</p>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No wetland hydrology indicators observed.

ATTACHMENT 5

Biological Superior Option Concurrence Emails from
U.S. Fish and Wildlife Service and
California Department of Fish and Wildlife

From: Drewe, Karen@Wildlife <Karen.Drewe@wildlife.ca.gov>
Sent: Thursday, March 2, 2023 12:55 PM
To: Watanabe, Marlene; Kalinowski, Alison (Ali)@Wildlife; Zoutendyk, David; Gower, Patrick; Schmalbach, Heather@Wildlife
Cc: Osborn, Sara; Beth Procsal
Subject: [External] RE: City of SD February MHPA BLA meeting

Hello Marlene,

The City of San Diego has requested concurrence from the California Department of Fish and Wildlife (CDFW) on the Biologically Superior Option for the proposed Euclid Terrace Project (Project). The Wildlife Agencies met with the City and Project applicants and consultants on February 17, 2023.

Given the Project site's location outside of the MHPA, lack of connectivity to other wetlands or open space, lack of sensitive species on-site, and low-quality riparian habitat, CDFW provides concurrence on the Biologically Superior Option for the Euclid Terrace Project.

CDFW suggests that prior to the commencement of any construction-related activities the applicant submit a Notification pursuant to Section 1600 et. seq. of Fish & Game Code relating to impacts to streams.

Regards,
Karen

Karen Drewe
Senior Environmental Scientist (Supervisor)
Habitat Conservation Planning
CA Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, CA 92123

From: Watanabe, Marlene <MWatanabe@sandiego.gov>
Sent: Wednesday, March 1, 2023 3:17 PM
To: Drewe, Karen@Wildlife <Karen.Drewe@wildlife.ca.gov>; Kalinowski, Alison (Ali)@Wildlife <Alison.Kalinowski@Wildlife.ca.gov>; Zoutendyk, David <david_zoutendyk@fws.gov>; Gower, Patrick <patrick_gower@fws.gov>; Schmalbach, Heather@Wildlife <Heather.Schmalbach@Wildlife.ca.gov>
Cc: Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Osborn, Sara <SOsborn@sandiego.gov>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Lane, Jessie@Wildlife <Jessie.Lane@Wildlife.ca.gov>; Beth Procsal <bprocsal@reconenvironmental.com>
Subject: RE: City of SD February MHPA BLA meeting

Some people who received this message don't often get email from mwatanabe@sandiego.gov. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Good afternoon,

I just wanted to follow up on the requested BSO concurrence on the Euclid Terrace - PTS 675101 project discussed at the BLA Meeting on February 17th. Verbal concurrence was provided on this project during the meeting. However, the City's Biology Guidelines states that concurrence shall be obtained in writing. As such, please let me know if you can send your written concurrence or if you need anything else on this project.

Thank you,

Marlene Watanabe

Assistant Planner
Development Services Department
City of San Diego
1222 1st Ave, San Diego, CA 92101
☎: 619-446-5129

SanDiego.gov/DSD

Need to request a second opinion on an interpretation, or contact my supervisor for further assistance?

Supervisor: Sara Osborn, Senior Planner
Phone: 619-446-5381
Email: SOsborn@sandiego.gov

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-----Original Appointment-----

From: Forburger, Kristen <KForburger@sandiego.gov>

Sent: Wednesday, February 8, 2023 10:02 AM

To: Forburger, Kristen; Forburger, Kristen; Monroe, Daniel; Ash-Reynolds, Tara; Drewe, Karen@Wildlife; Kalinowski, Alison (Ali)@Wildlife; Zoutendyk, David; Gower, Patrick; Graham, Kaelynn; Schmalbach, Heather@Wildlife; Pascual, Elena; Ramirez Manriquez, Edgar; Watanabe, Marlene; Beth Procsal; Jennifer Campos; Drewe, Karen@Wildlife; Kalinowski, Alison (Ali)@Wildlife; Schmalbach, Heather@Wildlife; Beth Procsal; Jennifer Campos

Cc: Berninger, Mark; Shearer-Nguyen, Elizabeth; Chase, Julia; Mayer, David@Wildlife; Allen, Sara; Allen, Jason; Marshall, Dawna; Osborn, Sara; Allen Kashani; Lane, Jessie@Wildlife; 'Vince Scheidt'; 'pipemaster7@cox.net'; Prem Advani; Hugo Castaneda; Charles Johnson; Brewster, Anastasia; Rothman, Christine; Jasmine Bakker; Jim Prine; Meagan Olson; carlos dreambuilders.bz; Herm Rosenman; Ball, Laura; Eng, Anita; Mayer, David@Wildlife; Allen Kashani; Lane, Jessie@Wildlife; 'Vince Scheidt'; 'pipemaster7@cox.net'; Prem Advani; Hugo Castaneda; Charles Johnson; Meagan Olson; carlos dreambuilders.bz; Herm Rosenman

Subject: City of SD February MHPA BLA meeting

When: Friday, February 17, 2023 9:00 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Good morning everyone,

Please see attached agenda for February's MHPA BLA meeting 2/17/2023. There are 4 items on the agenda.

1. SW Village Information item continued discussion. Link to BTR included in agenda and previously provided.
2. Otay Reed Mitigation Site MHPA Addition only BLA
3. Euclid Terrace BSO: supporting materials sent via email 1/12/2023
4. Mt. Albertine TM BSO: supporting materials sent via email 1/23/2023

All supporting materials can be found via the link below. Please let me know if there are issues accessing the information.

https://drive.google.com/drive/folders/1gPaqrwwcRMIAT7WE0d0wfm7Wq51vyGgJ?usp=share_link

City staff, please forward the appointment to applicant teams as necessary. Join the meeting at the time specified on the agenda.

Thank you,
Kristy Forburger
Project Manager III
City of San Diego
Planning Department
Biodiverse SD/Multiple Species Conservation Program (MSCP)

T (619) 236-6583
www.sandiego.gov/planning

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From: Gower, Patrick <patrick_gower@fws.gov>
Sent: Wednesday, March 1, 2023 3:46 PM
To: Watanabe, Marlene; Drewe, Karen@Wildlife; Kristy Forburger; Kalinowski, Alison (Ali)@Wildlife; Zoutendyk, David; Schmalbach, Heather@Wildlife
Cc: Mayer, David@Wildlife; Osborn, Sara; Mayer, David@Wildlife; Lane, Jessie@Wildlife; Beth Procsal
Subject: Re: [EXTERNAL] RE: City of SD February MHPA BLA meeting

The Service concurs with the biologically superior option for the Euclid Terrace - PTS 675101 project. If you have any questions please contact me.

From: Watanabe, Marlene <MWatanabe@sandiego.gov>
Sent: Wednesday, March 1, 2023 3:16 PM
To: Drewe, Karen@Wildlife <Karen.Drewe@wildlife.ca.gov>; Kalinowski, Alison (Ali)@Wildlife <Alison.Kalinowski@Wildlife.ca.gov>; Zoutendyk, David <David_Zoutendyk@fws.gov>; Gower, Patrick <patrick_gower@fws.gov>; Schmalbach, Heather@Wildlife <Heather.Schmalbach@Wildlife.ca.gov>
Cc: Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Osborn, Sara <SOsborn@sandiego.gov>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Lane, Jessie@Wildlife <Jessie.Lane@Wildlife.ca.gov>; Beth Procsal <bprocsal@reconenvironmental.com>
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Marlene Watanabe
Assistant Planner
Development Services Department
City of San Diego
1222 1st Ave, San Diego, CA 92101
☎: 619-446-5129

[SanDiego.gov/DSD](https://www.sandiego.gov/DSD)

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Phone: 619-446-5381

Email: SOsborn@sandiego.gov

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Cc: Berninger, Mark; Shearer-Nguyen, Elizabeth; Chase, Julia; Mayer, David@Wildlife; Allen, Sara; Allen, Jason; Marshall, Dawna; Osborn, Sara; Allen Kashani; Lane, Jessie@Wildlife; 'Vince Scheidt'; 'pipemaster7@cox.net'; Prem Advani; Hugo Castaneda; Charles Johnson; Brewster, Anastasia; Rothman, Christine; Jasmine Bakker; Jim Prine; Meagan Olson; carlos dreambuilders.bz; Herm Rosenman; Ball, Laura; Eng, Anita; Mayer, David@Wildlife; Allen Kashani; Lane, Jessie@Wildlife; 'Vince Scheidt'; 'pipemaster7@cox.net'; Prem Advani; Hugo Castaneda; Charles Johnson; Meagan Olson; carlos dreambuilders.bz; Herm Rosenman

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Kristy Forburger
Project Manager III
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ATTACHMENT 6

Mitigation Credit Availability for the Euclid Terrace Project,
San Diego – Letter from the San Luis Rey Mitigation Bank



October 31, 2022

Via Electronic Mail

Beth Procsal
Senior Biologist
RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108

RE: Mitigation Credit Availability for the Euclid Terrace Project, San Diego

Dear Beth:

Thank you for the opportunity to provide you with a mitigation solution on behalf of your client (“**Project Proponent**”) for the Euclid Terrace Project (“**Project**”) in the City of San Diego. Wildlands SLR Holdings I, LLC (“**Bank Owner**”) has received approval of the San Luis Rey Mitigation Bank (“**SLRMB**”) from the U.S. Army Corps of Engineers (“**Corps**”) and the California Department of Fish and Wildlife (“**CDFW**”) to provide wetland and non-wetland waters of the United States/State credits for sale as compensation for the loss of waters of the United States, waters of the State and/or State jurisdictional habitats.

We understand your Project expects a need to purchase 0.07 acre of Re-established River: Wetland Waters of the U.S./State credits. Wildlands is pleased to confirm the following credits are currently available:

Bank	Credit Type	Credit Classification	# Credits Available Now (Ac.)
San Luis Rey Mitigation Bank	Re-established River: Wetland Waters of the U.S./State	Riparian Re-establishment	14.51

As you may know, the primary benefit of purchasing bank credits is that it terminates your liability as a Project Proponent of habitat mitigation. By acquiring mitigation from the SLRMB, the Project Proponent is relieved of environmental engineering expenses, the construction and development costs, and the contingent liabilities of guaranteeing the success of an onsite or offsite mitigation project. The Bank Owner is fully responsible for all financial and performance obligations of mitigation credits purchased from the San Luis Rey Mitigation Bank.

Please do not hesitate to contact me if you have any questions. I look forward to the possibility of working with you to provide a mitigation solution for the Project.

Very truly yours,



Julie Maddox
Director of Sales
Wildlands