



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: August 12, 2019 September 28, 2020

TO: Peter Fogec, Associate Planner, Public Works/Engineering

FROM: Maya Mazon, Biologist III, Public Works Department

SUBJECT: Addendum to the Biological Resource Letter for the Water and Storm Group 968 (WBS No. B-14099.02.02/B-15028.02.02), City of San Diego, California

This memorandum is an addendum to the Biological Resource Letter written by Dudek on May 14, 2018. The purpose of the addendum is to address major comments provided by DSD and MSCP during CEQA and SDP review. This addendum has been revised and submitted after project processing and has been reviewed by the Development Services Department staff prior to preparation of the CEQA document. The consultant, Dudek, was unable to revise the Biological Resource Letter as their contract had expired when comments were submitted. As a result, the major comments are being addressed in this addendum by Engineering and Capital Projects biologist, Maya Mazon. Minor comments such as modifications of table titles or word misuse in the Biological Resource Letter will not be addressed as the comments are minor in nature and do not affect the analysis required to make a determination.

Consistency Analysis

The project is within and adjacent to the MHPA and will adhere to all MHPA Land Use Considerations. The guidelines, applicability and implementation are outlined in Table 1 below.

Table 1
 Consistency Analysis: Compatible Land Uses

Compatible Land Uses Section 1.4.1 MSCP Subarea Plan*	Applicability	Implementation
<p>The following land uses are considered conditionally compatible with the biological objectives of the MSCP and thus will be allowed within the City's MHPA:</p> <ul style="list-style-type: none"> • Passive recreation • Utility lines and roads in compliance with policies described in Section 1.4.2 • Limited water facilities and other essential public facilities • Limited low density residential uses • Brush management (Zone 2) • Limited agriculture 	<p>The project proposes to replace or abandon water main and storm drain and therefore is a compatible land use within the City's MHPA.</p>	N/A
General Planning Policies and Design Guidelines Section 1.4.2 MSCP Subarea Plan*	Applicability	Implementation
<i>Roads and Utilities</i>		
<p>All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.</p>	<p>Improvements to existing structures and facilities in MHPA lands at Sites 4, 8, and 12 are limited to 0.02 acres. The proposed improvements have been sited to occur in previously disturbed areas to minimize impacts to MHPA.</p>	N/A
<p>All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species and wetlands. If avoidance is infeasible, mitigation will be required.</p>	<p>Minimal impacts to MHPA lands (i.e., 0.02 acres) are necessary to complete the proposed water improvements. However all work planned is associated with existing utilities and infrastructure and does not include the construction of new utilities and facilitates in MHPA lands. Impacts to California gnatcatcher could occur in MHPA lands at Site 8 and Site 12 if work is to occur during the breeding season.</p>	<p>Project construction will be phased to avoid the breeding season for California gnatcatcher (March 1–August 15) at Site 8 and Site 12. If avoidance of the breeding season at this location is infeasible, preconstruction protocol-level surveys for this species shall be conducted and proper noise attenuation features, nest buffers, and nest avoidance will be implemented in the event that nesting California gnatcatchers are observed within 300 feet of the work site.</p>

General Planning Policies and Design Guidelines Section 1.4.2 MSCP Subarea Plan*	Applicability	Implementation
<i>Roads and Utilities</i>		
Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.	All vegetated areas temporarily disturbed by construction will be restored with native species.	The contractor shall permanently revegetate all disturbed areas.
Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.	No direct impacts to wildlife corridors are anticipated.	N/A
Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.	The proposed project does not involve the construction of new roads, trails, or access paths.	N/A
Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible of the MHPA in order to minimize impacts and fragmentation of sensitive species and habitat. If roads cross the MHPA, they should provide for fully-functional wildlife movement capability. Bridges are the preferred method of providing for movement, although culverts in selected locations may be acceptable. Fencing, grading and plant cover should be provided where needed to protect and shield animals, and guide them away from roads to appropriate crossings.	The proposed project does not involve the construction of new roads, trails, or access paths.	N/A

General Planning Policies and Design Guidelines Section 1.4.2 MSCP Subarea Plan*	Applicability	Implementation
Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.	The proposed project does not involve the construction of new roads, trails, or access paths.	N/A
<i>Roads and Utilities</i>		
For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management.	The proposed project involves improvements to existing utility lines and associated infrastructure in MHPA lands at Sites 4, 8, and 12. Impacts to MHPA lands due to the proposed are minimal and are limited to the minimum amount necessary to complete the improvements.	N/A
<i>Fencing, Lighting, and Storage</i>		
Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain sensitive species or habitats (e.g., vernal pools).	No fencing or permanent barriers are required or proposed.	N/A
Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.	No temporary or permanent lighting is required or proposed as part of the project.	N/A
<i>Materials Storage</i>		
Prohibit storage of materials (e.g., hazardous or toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.	Equipment storage and the storage of hazardous or toxic chemicals will not occur within the MHPA. Equipment storage and material stockpiling will occur in designated disturbed upland and developed lands.	The project development footprint within and adjacent to MHPA lands will be clearly delineated in the field by the contractor with temporary flagging and/or fencing.
MHPA Adjacency Guidelines Section 1.4.3 MSCP Subarea Plan	Applicability	Implementation
<i>Drainage</i>		
All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.	Ground disturbance for the project will largely consist of utility trenching, which will create no runoff potential. Consistent with the City Storm Water Standards, existing previously legal drainage, which flows toward the MHPA, shall be minimized.	The MHPA boundary and the limits of ground disturbance shall be clearly delineated on the construction documents and surveyed by the contractor. At the conclusion of the project, the existing grade will be restored and the current drainage patterns will be unchanged.

Toxics		
Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.	No hazardous construction materials storage would be allowed, which could impact the adjacent MHPA (including fuel or sediment) and any drainage from the construction site must be clear of such materials. Consistent with the City Storm Water Standards, existing previously legal drainage, which flows toward the MHPA, shall be minimized.	The contractor shall ensure all areas for staging, storage of equipment and materials, trash, equipment maintenance, and other construction-related activities are within the limits of the project Area of Potential Effect.
Lighting		
Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berthing, and/or other methods to protect the MHPA and sensitive species from night lighting.	No additional permanent lighting or night work is proposed for this project.	N/A
Noise		
Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	Appropriate nesting habitat adjacent to the MHPA is present for coastal California gnatcatcher at Site 8 and 12.	Construction at the sites listed will occur outside of the nesting season for this species. If construction occurs during the breeding season of this species, (3/1–8/15), then a pre-construction protocol and/or presence absence survey, as dictated in MSCP guideline for the species, will be conducted. If the species is observed during surveys then construction may be postponed. If construction cannot be postponed then noise attenuation by a qualified technician may occur.
Barriers		
New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	The proposed project involves the replacement and abandonment of water main lines and replacement of storm drain lines. However, the pipelines will be installed below ground and all areas temporarily disturbed by construction will be restored to preconstruction contours and conditions. No permanent barriers are required or proposed.	N/A

MHPA Adjacency Guidelines Section 1.4.3 MSCP Subarea Plan*	Applicability	Implementation
<i>Invasives</i>		
No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	Plant species within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC142.0400 and per table 142-04F, Revegetation and Irrigation Requirements) and be non- invasive.	The contractor shall permanently revegetate all graded, disturbed, or eroded areas that will not be permanently paved or covered by structures using native species approved by the City.
<i>Brush Management</i>		
New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA.	The project is not a structural development and would not create any new brush management zones.	N/A
<i>Grading/Land Development</i>		
Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.	No manufactures slopes are associated with the proposed project.	N/A
MHPA Framework Management Plan Section 1.5.2 MSCP Subarea Plan*	Applicability	Implementation
<i>Restoration</i>		
Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.	The project will temporarily displace native sage scrub and chaparral habitats, developed and ornamental vegetation, and two special-status plants. Following project completion, the temporarily impacted areas will be revegetated and restored in place.	A revegetation plan has been prepared featuring native species that are typical of the area and erosion control features including silt fence and straw fiber rolls, where appropriate. The revegetation areas will be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seeding. This plan has been submitted to Development Services Department for review and approval.

* Source: City of San Diego 1997

Project Impacts

The project proposes to directly impact 4 individual (~200 sqft) Nuttall's scrub oaks (*Quercus dumosa*) of the 73 individuals observed at Site 12. Four individuals would constitute ~5% of the present population and is not anticipated to significantly affect the population at this location. Therefore, impacts are determined to not be significant and mitigation is not required.

Mitigation Measures

This section describes the mitigation measures (MMs) required to offset direct and/or indirect impacts to Tier I or II vegetation communities, jurisdictional resources, special-status plants, coastal California gnatcatcher, and breeding birds protected under the federal MBTA, state Fish and Game Code, and MSCP. These mitigation measures will reduce identified and potential significant impacts to a level that is less than significant pursuant to CEQA.

BIO-1 Direct impacts to 0.121 acre of Tier I and II vegetation communities.

MM-1 To compensate for the loss of Tier I and II vegetation communities, the following mitigation described in Table 2 is required based on the City's mitigation ratios for mitigation land within the MHPA (City of San Diego 2018).

Table 2
Mitigation Requirements

Vegetation Community/Land Cover	Tier Level	Inside MHPA			Outside MHPA			Total Mitigation (Ac.)
		Impacts (Ac.)	Ratio*	Mitigation Required (Ac.)	Impacts (Ac.)	Ratio*	Mitigation Required (Ac.)	
Diegan coastal sage scrub	II	0.003	1:1	0.003	0.030	1:1	0.030	0.033
Diegan Coastal Sage Scrub – Restoration	II	—	—	—	0.003	1:1	0.003	0.003
Disturbed Diegan Coastal Sage Scrub	II	—	—	—	0.012	1:1	0.012	0.012
Scrub oak chaparral	I	0.006	2:1	0.012	0.061	1:1	0.061	0.073
Total		0.009	—	0.015	0.106	—	0.106	0.121

*Mitigation for impacts will occur within the MHPA.

Mitigation will occur at Canyon View, an existing City of San Diego Public Utilities Department mitigation site.

BIO-2, BIO-3, and BIO-4 Construction-related direct, temporary impacts to 0.048 acres of potential coastal California gnatcatcher habitat. Construction-related direct and indirect impacts may occur, if construction occurs during the avian breeding season (i.e., February 1 through September 15).

MM-2 The following general measures shall be implemented prior to construction to protect wildlife from construction-related impacts.

MM-2(a) **Biologist Verification** – The owner/permittee shall provide a letter to the City of San Diego’s (City) Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City’s Biological Guidelines (City of San Diego 2018, has been retained to implement the project’s biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

1. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project’s biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
2. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per the City’s Biology Guidelines; the Multiple Species Conservation Program (MSCP) Plan; the Environmentally Sensitive Lands ordinance; project permit conditions; CEQA; state and federal endangered species acts; and/or other local, state, or federal requirements.
3. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in item 2 above. It should also include the following: restoration/revegetation plans, plant salvage/relocation requirements (if applicable), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service (USFWS) protocol), timing of

surveys, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

4. **Avian Protection Requirements** – To avoid any direct impacts to Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Coastal California gnatcatcher (*Polioptila californica californica*), and any species identified as a listed, candidate, sensitive, or special status species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting Southern California rufous-crowned sparrow, Coastal California gnatcatcher (*Polioptila californica californica*), sensitive or MSCP-covered birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

5. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
6. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas).

The following measures shall be implemented during construction to ensure impacts to breeding wildlife are avoided and/or minimized.

7. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for construction activities/staging, or previously disturbed as shown on the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the preconstruction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be emailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
8. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access). If active nests or other previously

unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

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

MM-2(b)

Prior to the preconstruction meeting, the City Manager (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the project requirements regarding the California gnatcatcher, as specified below, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur at the Central Avenue or Laurel Street sites during the California gnatcatcher breeding season (March 1 through August 15), until the following requirements have been met to the satisfaction of the City Manager:

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels (dB(A)) hourly average for the presence of the California gnatcatcher. Surveys for California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If California gnatcatchers are present, then the following conditions must be met:
 - a. From March 1 through August 15, no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
 - b. From March 1 through August 15, no construction activities shall occur within any portion of the site where construction

- activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied California gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or
- c. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction

equipment and the simultaneous use of equipment.

2. If California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:
 - a. If this evidence indicates that the potential is high for California gnatcatcher to be present based on historical records or site conditions, then Condition 1(a) shall be adhered to as specified above.
 - b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

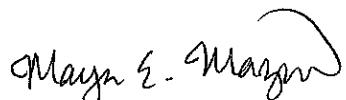
BIO-4, BIO-5, and BIO-6 Construction-related indirect impacts to vegetation communities, jurisdictional resources, and special-status plants may occur due to dust, invasive plant species, runoff, etc., both in the short and long terms. MM-4(a) addresses short-term, construction-related indirect impacts. MM-4(b) address long-term, post-construction-related indirect impacts.

MM-3(a) Typical construction best management practices (BMPs) shall limit the spread of dust, and the project Revegetation Plan shall establish a native plant community within any temporarily disturbed areas, thus minimizing the potential for invasive plant species. Increased human presence is a potential short-term indirect impact. During construction, typical BMPs, such as having trash containers on site, a demarcated limit of work, and contractor education, shall limit the potential for trash and other human disturbance. The velocity of runoff may also change during construction and could potentially affect off-site sensitive vegetation communities. Under these conditions, the City shall incorporate methods to control runoff, including a Storm Water Pollution Prevention Plan (SWPPP) to meet National Pollution Discharge Elimination System (NPDES) regulations. However, if the project proposes less than 5,000 square feet of ground disturbance and has less than a 5-foot elevation change within each impact site, a Water Pollution Control Plan may be required instead.

MM-3(b) Habitat restoration shall also be completed at each project location, in accordance with the City's Biology Guidelines and Landscape Regulations (City of San Diego 2012). A Revegetation Plan shall be prepared by a qualified Biological or Restoration Specialist. Habitat restoration shall feature native species that are typical of the area, and erosion control features shall include silt fence and straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seeding.

If you have any questions or concerns, do not hesitate to contact me: mmazon@sandiego.gov or call (619) 533-4620.

Sincerely,



Maya Mazon
Biologist III

cc: Sean Paver, Senior Planner, Public Works Department