
Appendix C-2

Biological Technical Memorandum for the Pacific Specific Plan Project Alternative

Memorandum

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From: Thomas Liddicoat, HELIX Environmental Planning, Inc.

Subject: Comparison of the Pacific Specific Plan Development Project Draft EIR Proposed Project and the Reduced Pacific Specific Plan Project Alternative

HELIX Project: 00357.00040.001

Message:

This memorandum serves to document a “Reduced Project Alternative” for the Pacific Specific Plan Development Project (project). Details of the project were initially outlined in the Pacific Development Project Biological Resources Technical Report (HELIX 2023a) as well as the Draft Environmental Impact Report (EIR; Dudek 2023) for the project. Revisions to the project site plan were made to address Wildlife Agency (i.e., U.S. Fish and Wildlife Service [USFWS] and California Department of Fish and Game [CDFW]) comment to further reduce development footprint impacts on-site.

Thus, this memorandum provides a comparison of impacts to biological resources, between 1) the proposed project in the Draft EIR and 2) a Reduced Pacific Specific Plan Project Alternative (RPSPPA). The biological resources data from the Draft EIR, the engineering refinements associated with roadway dedications and improvements, and additional biological surveys conducted by HELIX in response to draft EIR comments were used for the comparison discussed herein. Figure 1 attached to this memorandum depicts the disturbance area footprints for proposed project in the Draft EIR and the RPSPPA. Impacts within the 33.22-acre site as well as off-site impacts (i.e., outside of the project site boundary) associated with roadway dedications and improvements are presented in Figure 1. As seen in Figure 1, the footprint of off-site impacts is nearly the same for both the proposed project in the Draft EIR and the RPSPPA.

The proposed project presented in Section 2 the Draft EIR would provide 449 units occupying a development footprint area of approximately 15.09 acres of the 33.22-acre site. The proposed project in

the Draft EIR also includes 0.17 acres of roadway dedications on-site, for an overall disturbance impact of 15.26 acres (approximately 46%) of the 33.22-acre site. Based on engineering refinements and associated with the off-site roadway dedications and improvements, the proposed project presented in the Draft EIR would impact 15.33 acres (approximately 46%) of the 33.22-acre site and 1.53 acres off-site, for a total disturbance footprint of 16.86 acres. In comparison, the RPSPPA proposes 299 units and would result in impacts to 13.52 acres (approximately 41%) of the 33.22-acre site by implementation of the project development footprint and on-site roadway dedications. Implementation of the RPSPPA would also result in 1.52 acres of impacts off-site, for an overall disturbance footprint totaling 15.04 acres. Ultimately, the RPSPPA would result in approximately 5% less (1.81 acres less) disturbance impact area to the 33.22-acre site, while providing 150 fewer residential housing units. Table 1 below presents a comparison of impacts by the proposed project in the Draft EIR and the RPSPPA.

Table 1. Proposed Project Footprint Impacts

Project Alternative	On-Site Disturbance Footprint ¹	Off-Site Disturbance Footprint ²	Total
Draft EIR Proposed Project (449 units)	15.33 acres	1.53 acres	16.86 acres
Reduced Pacific Specific Plan Project Alternative (299 units)	13.52 acres	1.52 acres	15.04 acres

¹ Reflects residential development and on-site roadway dedications.

² Consists of off-site roadway dedications and roadway improvements.

When comparing impacts to biological resources, the proposed project in the Draft EIR and the RPSPPA would both impact native vegetation, including vernal pools, as well as listed special-status plants and animal species. The impacts to vegetation types are nearly the same; the proposed project in the Draft EIR and the RPSPPA would both result in impacts to Diegan coastal sage scrub, grassland, and vernal pool vegetation, although impacts to the 33.22-acre site would be approximately 1.81 acres less as a result of implementation of the RPSPPA. Both the proposed project in the Draft EIR and the RPSPPA would impact vernal pools and other features known to be occupied by the federally listed endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*); however, implementation of the RPSPPA would impact slightly less. Table 2 below presents a comparison of impacts to vernal pools and San Diego fairy shrimp with implementation of the proposed project in the Draft EIR versus the RPSPPA, of which all are within the 33.22-acre site. No impacts to vernal pools or other features occupied by San Diego fairy shrimp would result with implementation of the off-site roadway dedications and improvements.

Table 2. Proposed Project Impacts to Vernal Pools and San Diego Fairy Shrimp

Project Alternative	Vernal Pools	San Diego Fairy Shrimp
Draft EIR Proposed Project (449 units)	0.15-acre	8 features
Reduced Pacific Specific Plan Project Alternative (299 units)	0.14-acre	6 features

In regard to listed special-status plants, both the proposed project in the Draft EIR and the RPSPPA would impact two listed plant species. Specifically, both project footprints would impact the federally

listed threatened and state listed endangered thread-leaved brodiaea (*Brodiaea filifolia*) and the federally listed endangered and state listed endangered San Diego button celery (*Eryngium aristulatum* var. *parishii*). As reflected in Table 3 below, the impacts to listed plant species by implementation of the proposed project in the Draft EIR and the RPSPPA are the same.

Table 3. Proposed Project Impacts to Listed Plant Species

Project Alternative	Thread-leaved Brodiaea	San Diego Button Celery
Draft EIR Proposed Project (449 units)	33,879 plants	103 plants
Reduced Pacific Specific Plan Project Alternative (299 units)	33,879 plants	103 plants

In addition to the reduction of footprint impacts by implementation of the RPSPPA, the RPSPPA also provides less development interfaces adjacent to proposed biological resources preservation areas on-site. This reduction of development interface theoretically would result in a reduction of potential indirect impacts “edge effects” on those adjacent biological preservation areas.

In conclusion, both the proposed project in the Draft EIR and the RPSPPA would result in significant impacts to sensitive biological resources (i.e., native vegetation, vernal pools, San Diego fairy shrimp, San Diego button celery, and thread-leaved brodiaea) and both would be required to incorporate mitigation measures (MM) MM-BIO-1a through MM-BIO-8b in the Draft EIR to reduce impacts to less than significant. These MMs have been revised in response to comments on the Draft EIR, which are presented in the Final EIR Errata for Biological Resources. The MMs in the Final EIR would adequately reduce project impacts to less than significant.

Overall, the primary differences in impacts to sensitive biological resources between the proposed project in the Draft EIR and the RPSPPA are that:

- 1) The RPSPPA would result in 0.01-acre less impacts to vernal pools and would avoid two vernal pools occupied by San Diego fairy shrimp, which would be impacted by implementation of the proposed project in the Draft EIR
- 2) The RPSPPA would provide for a larger (approximately 1.81 acres more) biological preservation area of the site. Approximately 19.70 acres of biological preservation would be provided with implementation of the RPSPPA project whereas approximately 17.89 acres of biological preservation would be provided with implementation of the proposed project in the Draft EIR.

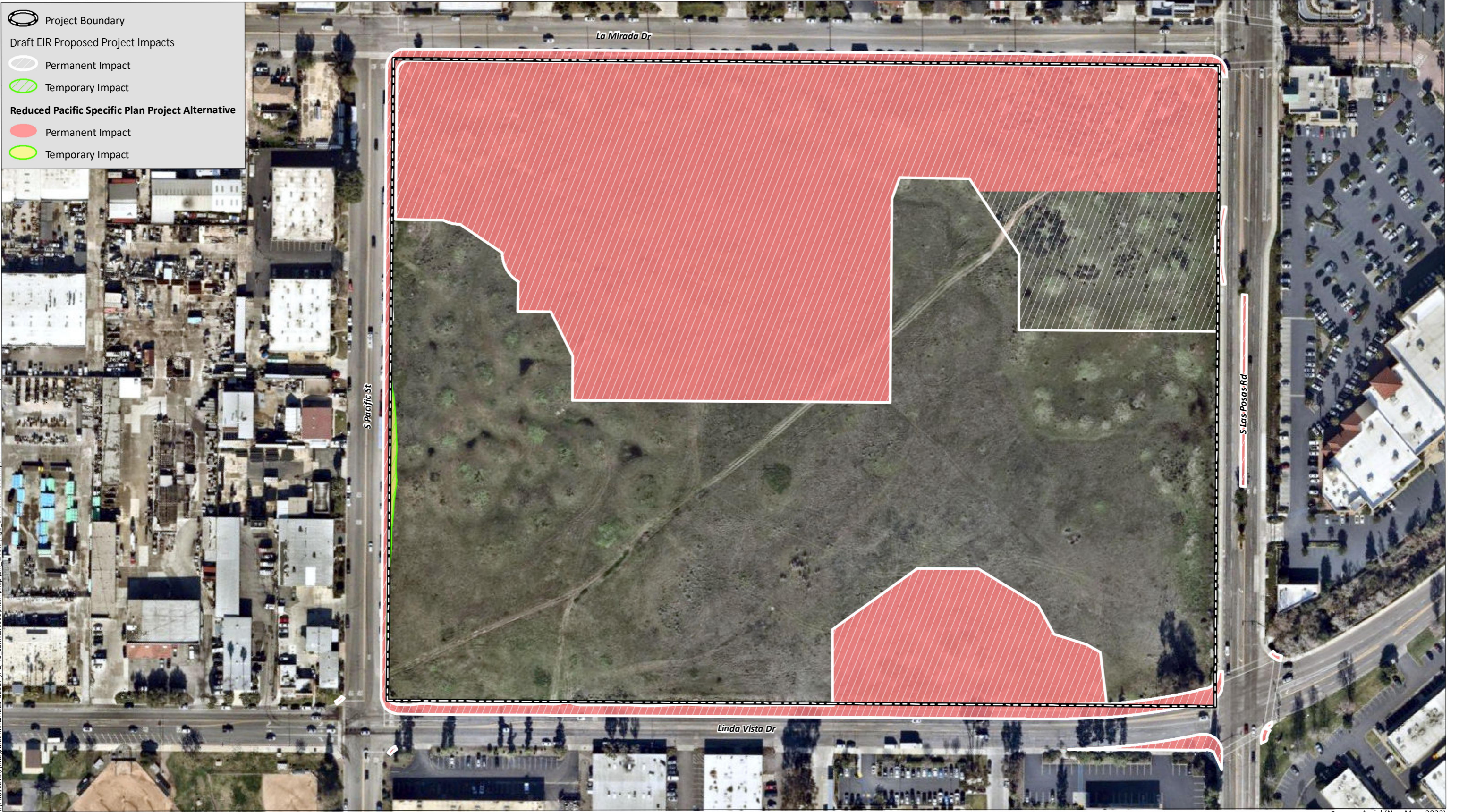
Attachments:

Figure 1 – Footprint Comparison of Draft EIR Proposed Project and the Reduced Pacific Specific Plan Alternative

References Cited:

Dudek. 2023. Draft EIR for City of San Marcos Pacific Specific Plan Project. March.

U.S. Fish and Wildlife Service (USFWS). 2023. Comments on the Environmental Impact Report for the Pacific Specific Plan, City of San Marcos, San Diego County, California. April 13.



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