

**Grant K-8 School Whole Site Modernization Project
Final MND/IS**

Appendix B

Slope Repair Biological Letter Report

Prepared by Rocks Biological Consulting

July 23, 2014



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Ms. Kathie Washington
BRG Consulting, Inc.
304 Ivy Street
San Diego, CA 92101

Subject: Biological Letter Report for the Proposed Slope Repair Project at the Grant K-8 School, San Diego, California

Ms. Washington:

This letter report describes the results of the biological survey Rocks Biological Consulting (RBC) conducted at the proposed Slope Repair Project at the Grant K-8 School (Project). The Project site is located in the Mission Hills Community and bounded to the north by Washington Place, to the west by Pioneer Park, to the east by an apartment complex and associated ornamental vegetation, and to the south by West Washington Street (Figure 1). This report has been prepared in conformance with the California Environmental Quality Act (CEQA).

The San Diego Unified School District (SDUSD) is proposing to reconstruct an eroding slope behind the Grant K-8 School site, particularly the southern and eastern slopes, and replace some paved areas within the existing school footprint. Between the southern end of the school's current footprint and West Washington Street there is a steep slope, the proposed project would repair this slope. Activities would include installing landscaping and irrigation, paving, replacing a retaining wall, rebuilding the slope, and site access in order to conduct these activities. All activities would take place on SDUSD property. A Whole Site Modernization is also taking place at the Grant K-8 School and is considered a separate project. This project will encroach into some undeveloped land which contains Diegan Coastal Sage Scrub, a sensitive habitat under local and state regulations. However, the Coastal Sage Scrub on the slope was planted by school faculty and community volunteers, therefore impacts are not considered significant under CEQA. SDUSD will act as the lead agency under CEQA and a Notice of Exemption (NOE) is currently being prepared for the Project.

Methodology

Rocks Biological Consulting (RBC) began preparations for the biological survey by creating field maps using Geographic Information System (GIS) and incorporating relevant data including a color aerial photograph and the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB) information. General surveys were conducted for plant and animal species and habitats that are considered sensitive according to the United States Fish and Wildlife Service (USFWS), California Native Plant Society (CNPS), and the CNDDDB record for the Point Loma 7.5' Quadrangle.

On July 15, 2014 RBC conducted general surveys for flora and fauna on site and mapped vegetation communities/land uses within the project site and the immediately surrounding area. No focused

surveys for plant or wildlife species were conducted, and no formal wetland delineation was conducted. Vegetation community classifications follow Holland (1986), plant names follow Simpson and Rebman (2006), and animal names follow Laudenslayer (1991). The on-site survey was conducted in late spring during late morning in warm weather (68-70F). As such, faunal activity at the time was moderate and late spring species would have been observable; however some early spring and summer season species would not have been present.

Project plans were provided to Rocks Biological Consulting by BRG Consulting, Inc. (BRG) and were overlaid on the vegetation map. Project impacts were quantified by BRG using GIS software.

Survey Results

The school is located on a relatively flat, developed mesa top surrounded by other development. The steep slope that needs repair is south of the school's current footprint, and slopes quickly down to West Washington Street. The slope is made of an eroding sandstone substrate. At the toe of the slope there is a concrete lined channel, which is not a blue line or ephemeral stream based on USGS mapping and does not contain hydrophytic vegetation. The concrete channel is covered in thick non-native ice plant (*Carpobrotus edulis*), and as such this area would not qualify as a wetland.

The site is generally developed and disturbed, and supports ornamental and ruderal areas, Eucalyptus woodland, with a smaller area of non-native grassland. There is disturbed Coastal Sage Scrub on the slope that was planted by school faculty and community volunteers. Coincidentally, staff at RBC served as community volunteers for the native slope planting effort and observed the site prior to plant installation. Though there were very small individuals/patches of native Coastal Sage Scrub present, none were large enough to have been mapped as native habitat prior to the planting effort (Rocks, 2014).

Vegetation communities and land uses within the Project area include:

Planted Diegan Coastal Sage Scrub (DCSS-P) is typical comprised of low, soft-woody subshrubs to about 1 meter (3 feet) high, many of which are facultatively drought-deciduous. The slope was likely Diegan Coastal Sage Scrub prior to planting; however had been altered by surrounding development, non-native plantings such as Eucalyptus, and erosion. This association in its native form is typically found on dry sites, such as steep, south-facing slopes or clay-rich soils that are slow to release stored water. Due to the planted nature of this area the species observed are not typical associations of natural Diegan Coastal Sage Scrub and include some species outside of their range such as Brittlebush (*Encelia farinosa* var. *farinosa*). Species observed in the planted area include Big Saltbush (*Atriplex lentiformis*), Coast Cholla (*Cylindropuntia prolifera*) and California Sagebrush (*Artemisia californica*).

Developed (DEV) areas typically support no vegetation because of the presence of roads, buildings, roadways, and other development. The disturbed land/developed areas onsite include paved playground areas and school buildings.

Eucalyptus Woodland (EUC) communities are lands dominated by Eucalyptus (*Eucalyptus* spp.) trees. Little or no understory vegetation occurs in dense Eucalyptus Woodland because of the thick accumulation of leaf litter that tends to accumulate under Eucalyptus trees. Eucalyptus trees are a non-native species that were imported from Australia and are of limited biological value except for potential raptor roosting and nesting.

Non-native Grasslands (NNG) communities consists of a dense to open cover of predominantly Eurasian grasses that have become widespread on disturbed lands. Non-native grasslands on the site are dominated by Ripgut Grass (*Bromus diandrus*), Slender Wild Oat (*Avena barbata*), and the ornamental perennial African Fountain Grass (*Pennisetum setaceum*). Other common non-native species include Goosefoot Nettle (*Chenopodium murale*) Garland Daisy (*Glebionis coronaria*).

Ornamental (ORN) areas typically consist of non-native landscape and/or garden plantings that have been planted in association with development. San Diego County supports many ornamental trees, shrubs and herbs that decorate urban areas. Ornamental species occur on-site in association with adjacent residential development.

Ruderal (RUD) habitat typically includes areas that have been previously disturbed by development or agricultural activities. It includes lands generally cleared of vegetation such that little or no natural habitat remains and lands disturbed such that at least 50 percent of plant cover is broad-leaved non-native species. The ruderal vegetation on site includes Iceplant (*Carpobrotus edulis*), Crown Daisy (*Glebionis coronarium*), and Tobacco Tree (*Nicotiana glauca*).

Animal observance on-site was low due to the relatively developed and disturbed nature of the area. Bird species noted were typical urban and urban-interface species, including Northern Mockingbird (*Mimus polyglottos*), Mourning Dove (*Zenaida macroura*), California Towhee (*Pipilo crissalis*), and House Finch (*Carpodacus mexicanus*).

No threatened, endangered, or sensitive animal or plant species were observed on-site during general biological surveys, and none are expected based on the relatively disturbed nature of the site.

Project Impact Analysis

The CEQA Guideline Section 21068 defines "significant effect on the environment" as a "substantial or potentially substantial adverse change in the environment." The CEQA Guidelines (Appendix G) further state that there may be a significant effect on biological resources if the project will:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Direct Impacts

The proposed Project will result in impacts to 0.39 acres of Planted Diegan Coastal Sage Scrub, 0.35 acres of Developed Land, 0.6 acres of Eucalyptus Woodland, 0.09 of Non-native Grassland, 0.35 acres of Ornamental and 0.17 acres of Ruderal vegetation, collectively. Total impacts are summarized in Table 1.

Table 1. Project impacts on vegetation communities/land uses

Vegetation Community	Impact (acres)
Planted Diegan Coastal Sage Scrub	0.39
Developed	0.35
Eucalyptus Woodland	0.60
Non-Native Grassland	0.09
Ornamental	0.35
Ruderal	0.17
Total	1.96

No direct impacts on sensitive plant species are anticipated with project implementation as the project will primarily be within non-native habitats that would not likely support sensitive species based on the site's disturbed, fragmented nature.

The project site is not adjacent to the City of San Diego's Multi-Habitat Planning Area (MHPA) so would not conflict with any Natural Community Conservation Plan (NCCP) land use adjacency requirements.

The site does have a potential to support nests within Eucalyptus trees that would be protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code (§3503) under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Compliance with this law will be required during project construction.

Indirect Impacts

Indirect impacts are not anticipated to occur during project construction. No sensitive species were detected and as such the indirect impacts of noise and lighting would not apply to the project.

Cumulative Impacts

Cumulative impacts are potential regional effects of a project and how a project, in combination with other projects and conditions of a region, may affect an ecosystem or one of its components beyond the project limits and on a regional scale.

If implemented, the proposed project would not result in a significant loss of habitat or sensitive species and would not result in significant cumulative impacts.

Conclusion

The proposed slope repair project at the Grant K-8 School and would not result in significant biological impacts and SDUSD will comply with state nesting bird regulations during project implementation. As such, impacts on biological resources would be less than significant.

Please do not hesitate to contact me if you have any questions or concerns about this report.

Sincerely,



Melanie Rocks
Principal Biologist

Attachments: Figures 1 Project Location Map
Figure 2 Biological Resources Map and Project Features
Site Photographs
Plant Species List
Wildlife Species List

References

- Baldwin, B.G., Goldman, D.H., Keil, D.J., Patterson, R., Rosatti, T.J. (eds). 2012. The Jepson Manual: Vascular Plants of California, Second Edition, Thoroughly Revised and Expanded. University of California Press, Berkeley, California. 1400 pp.
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- Holland, R.F. 1986. Preliminary descriptions of the terrestrial natural communities of California. State of California, The Resources Agency.
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- Sibley, D.A. 2000. The Sibley Guide to Birds, National Audubon Society. Chanticleer Press, Inc. New York.
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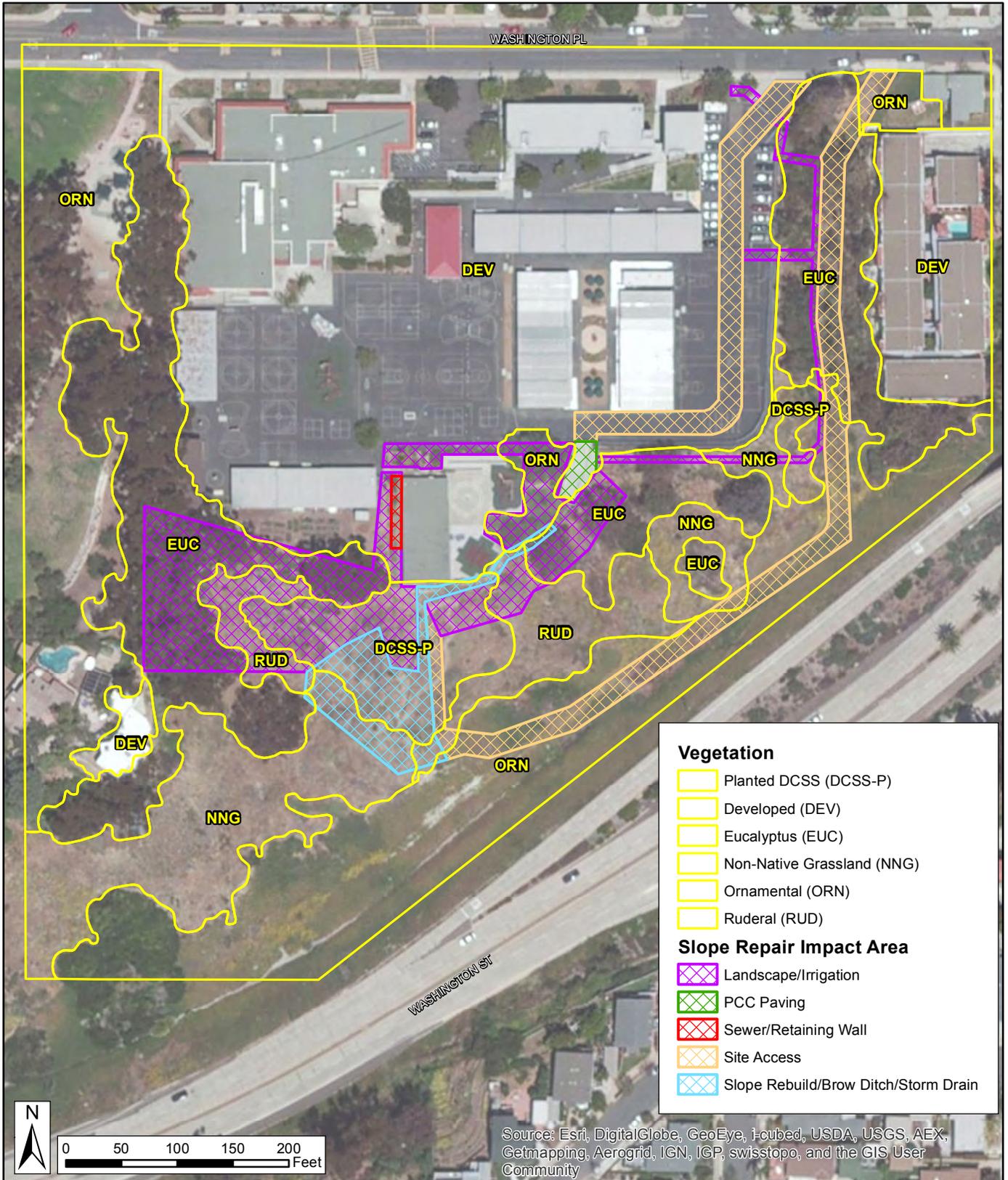
SOURCE: Esri, 2014; SanGIS, 2014; Rocks Biological Consulting, 2014

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Grant Elementary School
Project Location Map

FIGURE
1



SOURCE: Esri, 2014; SanGIS, 2014; Rocks Biological Consulting, 2014

7/23/14



Grant Elementary School
 Biological Resources Map
 and Project Features

FIGURE
 2

Grant K-8 Slope Stabilization Project Site Photos

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Photo 1. East-facing photo of the eroding slope with planted Diegan Coastal Sage Scrub. The chain link fence marks the existing school footprint.



Photo 2. Facing south through the Eucalyptus area on the west side of the project adjacent to Pioneer Park. West Washington Street is visible in the background.



Photo 3. Facing South-east with a view of the west side of the slope that will be stabilized.

Grant K-8 Slope Stabilization Project Plant List

July 15, 2014

Family	Scientific Name	Common Name	Planted	Habitat
Agavaceae	<i>Hesperoyucca whipplei</i>	Chaparral Candle	Planted	DCSS
Aizoaceae	* <i>Carpobrotus edulis</i>	Hottentot-Fig		ORN
	* <i>Malephora crocea</i> var. <i>crocea</i>	Crocea Iceplant		RUD
	* <i>Mesembryanthemum crystallinum</i>	Crystalline Iceplant		RUD/NGG
Anacardiaceae	<i>Rhus integrifolia</i>	Lemonadeberry		DCSS
	* <i>Schinus molle</i>	Peruvian Pepper Tree		ORN
Asteraceae	<i>Artemisia californica</i>	Coastal Sagebrush		DCSS
	<i>Baccharis pilularis</i>	Coyote Brush		DCSS
	<i>Baccharis sarothroides</i>	Broom Baccharis		DCSS
	<i>Bahiopsis laciniata</i>	San Diego Sunflower	Planted	DCSS
	<i>Encelia californica</i>	California Encelia	Planted	DCSS
	<i>Encelia farinosa</i> var. <i>farinosa</i>	Brittlebush, Incienso	Planted	DCSS
	* <i>Glebionis coronaria</i>	Garland/Crown Daisy		NGG
	<i>Isocoma menziesii</i> var. <i>menziesii</i>	Spreading Goldenbush	Planted	DCSS
Cactaceae	<i>Cylindropuntia prolifera</i>	Coast Cholla	Planted	DCSS
	* <i>Opuntia ficus-indica</i>	Mission Prickly-Pear, Indian-Fig		ORN
Chenopodiaceae	<i>Atriplex lentiformis</i>	Big Saltbush	Planted	DCSS
	* <i>Chenopodium murale</i>	Nettle-Leaf Goosefoot		NGG/RUD
	* <i>Salsola australis</i>	Australian Tumbleweed		RUD
Cleomaceae	<i>Peritoma arborea</i> var. <i>arborea</i>	Coast Bladderpod	Planted	DCSS
Crassulaceae	* <i>Crassula ovata</i>	Jade Plant		ORN
Euphorbiaceae	<i>Croton setiger</i>	Doveweed		NGG
Lamiaceae	<i>Salvia apiana</i>	White Sage	Planted	DCSS
Lamiaceae	<i>Salvia leucophylla</i>	San Luis Purple Sage	Planted	DCSS
Myrtaceae	* <i>Eucalyptus cladocalyx</i>	Sugar Gum		EUC
	* <i>Eucalyptus polyanthemos</i>	Silver Dollar Gum, Red Box		EUC
	* <i>Eucalyptus rudis</i>	Australian Flooded Gum		EUC
	* <i>Eucalyptus tereticornis</i>	Forest Red Gum		EUC NGG/DCS
Poaceae	* <i>Avena barbata</i>	Slender Wild Oat		S/EUC
	* <i>Bromus diandrus</i>	Ripgut Grass		NGG
	<i>Muhlenbergia microsperma</i>	Little-Seed Muhly		NGG/RUD
	* <i>Pennisetum setaceum</i>	African Fountain Grass		NGG
	<i>Eriogonum fasciculatum</i> var. <i>fasciculatum</i>	Coast California Buckwheat	Planted	DCSS
Polygonaceae				
Rosaceae	<i>Prunus ilicifolia</i> ssp. <i>ilicifolia</i>	Islay, Holly-Leaf Cherry		DCSS

Solanaceae	* <i>Nicotiana glauca</i>	Tree Tobacco	NNG
Verbenaceae	* <i>Lantana camara</i>	Lantana	RUD

Nomenclature from Baldwin (2012), Simpson and Reelman (2006)

* Non-native species

Habitat Codes

DCSS-Diegan Coastal Sage Scrub

DIST-Disturbed Habitat

EUC-Eucalyptus Woodland

NNG-Non-native Grassland

ORN-Ornamental

RUD-Ruderal

Grant K-8 Slope Stabilization Project Wildlife List

July 15, 2014

Birds

Bewick's Wren-*Thryomanes bewickii*

Black Phoebe-*Sayornis nigricans*

California Towhee-*Melospiza crissalis*

Dark-eyed Junco-*Junco hyemalis*

House Finch-*Carpodacus mexicanus*

Mourning Dove-*Zenaidura macroura*

Pacific-slope Flycatcher-*Empidonax difficilis*

Rufous Hummingbird-*Selasphorus rufus*

Mammals

California Ground Squirrel-*Otospermophilus beecheyi*