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December 16, 2019

Ms. Cynthia Curtis
Environmental Planning Manager
County of San Diego
Department of Public Works
5510 Overland Avenue Suite 410
San Diego, CA 92123

Reference: Biological and Jurisdictional Resources Impacts Memorandum for the Lemon Crest Drive
Drainage Facility Extension Improvements Project (RECON Number 9009-08)

Dear Ms. Curtis:

This letter report summarizes the potential impacts to biological and jurisdictional resources and mitigation measures for a new construction phase of the County of San Diego's (County) proposed Lemon Crest Drive Drainage Facility Extension Improvements Project (proposed project).

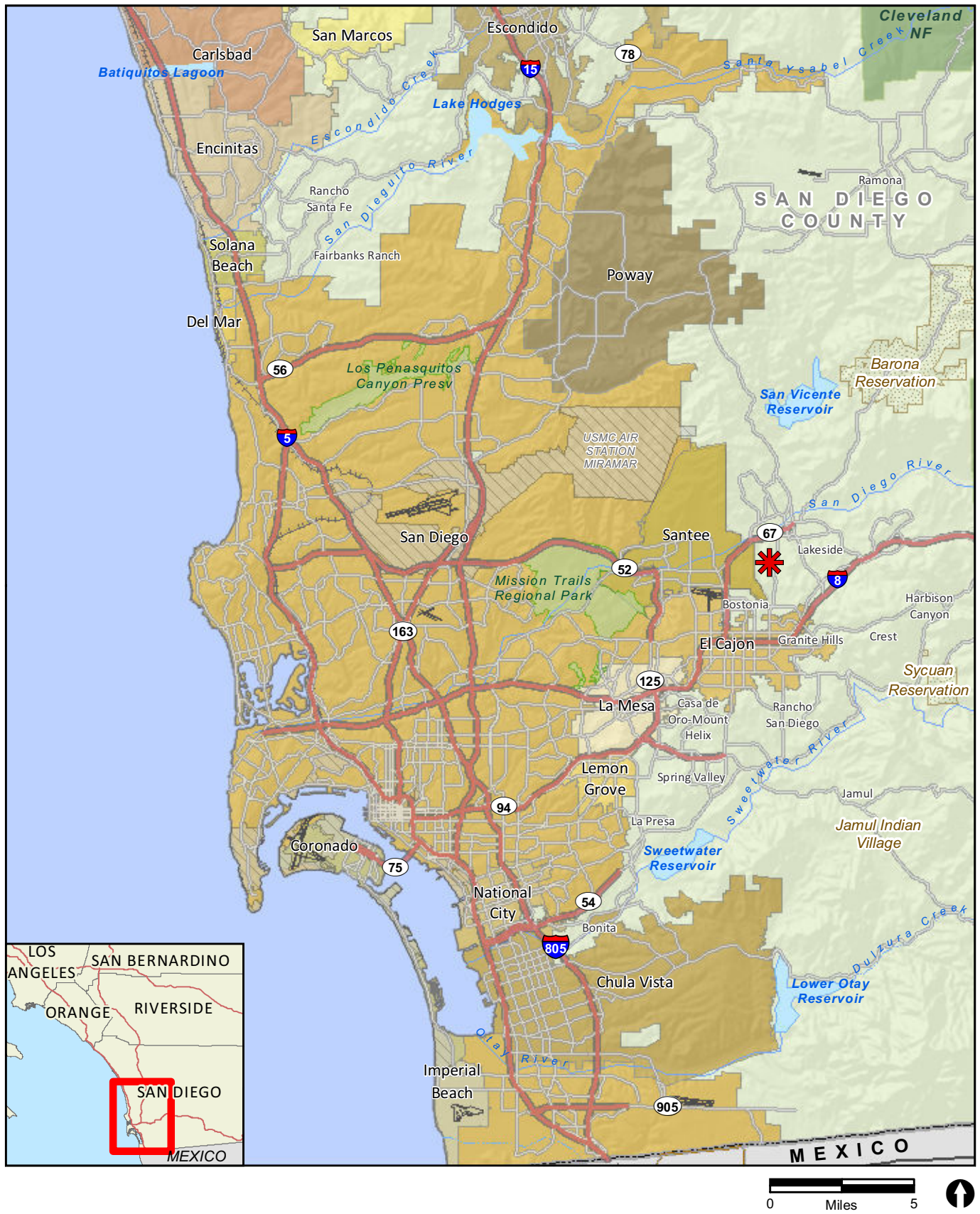
1.0 Introduction and Proposed Project Description

The purpose of this biological letter report is to update to previous reports for the project by analyzing the potential impacts to biological and jurisdictional resources on-site and outlining potential mitigation measures to reduce these impacts to below a level of significance.

1.1 Project Location and Description

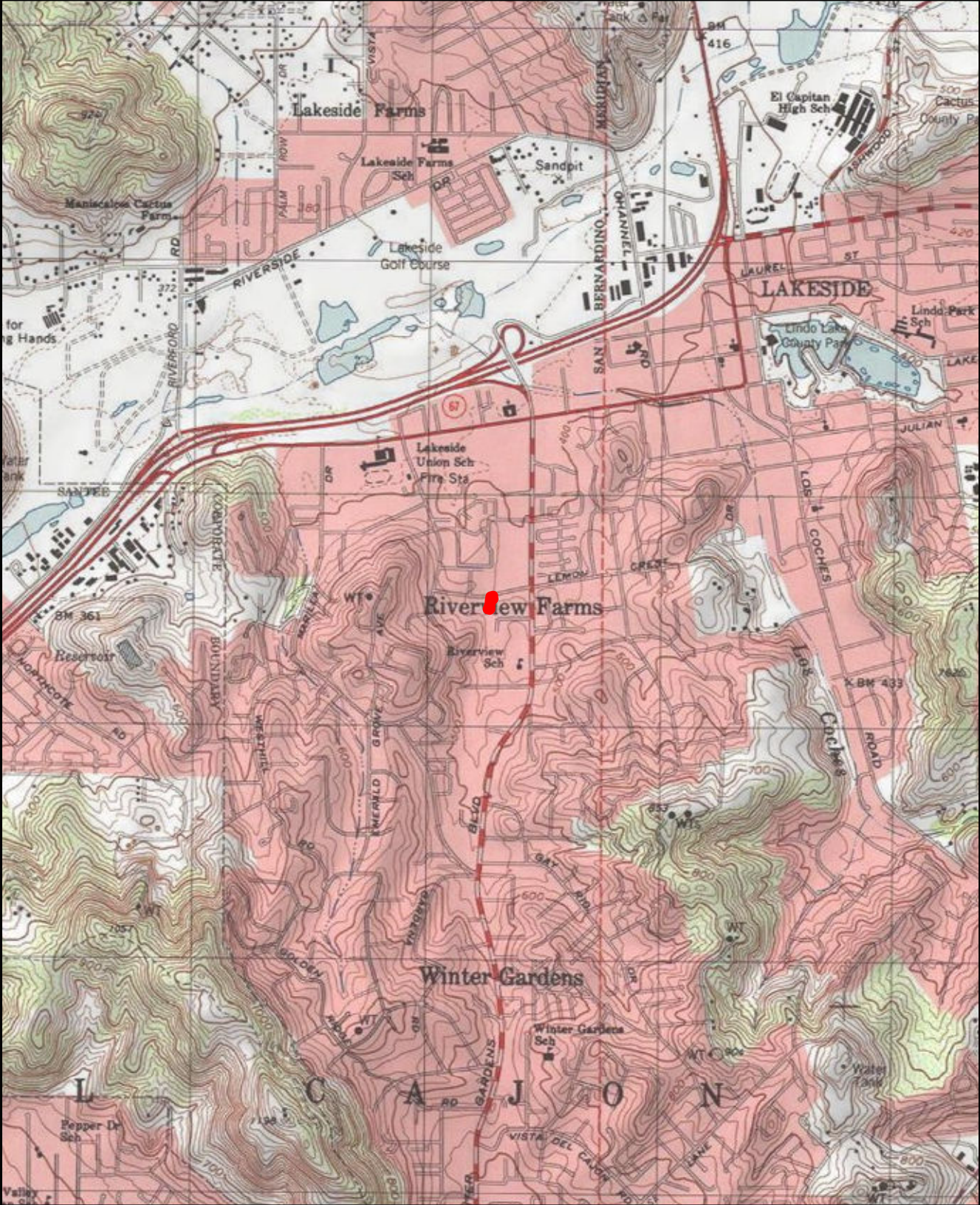
The proposed project is located in southwestern San Diego County, in the community of Lakeside, California (Figure 1). The project area is located in the El Cajon Landgrant as shown on the U.S. Geological Survey (USGS) 7.5-minute topographic map series, El Cajon quadrangle (Figure 2; USGS 1996).

The proposed project would improve the previously-installed 15-foot flood control channel by extending and undergrounding it for approximately 175 feet upstream (south) of the existing storm drain inlet. The proposed project is an extension of the existing Municipal Separate Stormwater System (MS4) drain at the edge of Lemon Crest Drive and will capture flows to alleviate localized flooding on private residential lots on the roadway. The newly located inlet will connect to the existing upstream channel with an angled concrete apron to quickly convey stormwater flows into the 175-foot, double 6-by-5-foot box culvert system. Between the roadway and the newly located MS4 inlet, the box culvert system will be undergrounded, and concrete blocks will be placed along the centerline to allow maintenance trucks to reach the new inlet location. An adjustable grate will be installed at the inlet to prevent the movement of trash and debris into the channel. Existing utilities within the project site may be relocated during construction, including water lines, power, and telecommunication poles. The temporarily disturbed areas will be recompact and revegetated. The approximate location of the previously existing 4-foot-wide channel, the location of the existing 15-foot-wide channel, and the proposed project area boundary are shown in Figure 3.



* Project Location

FIGURE 1
Regional Location




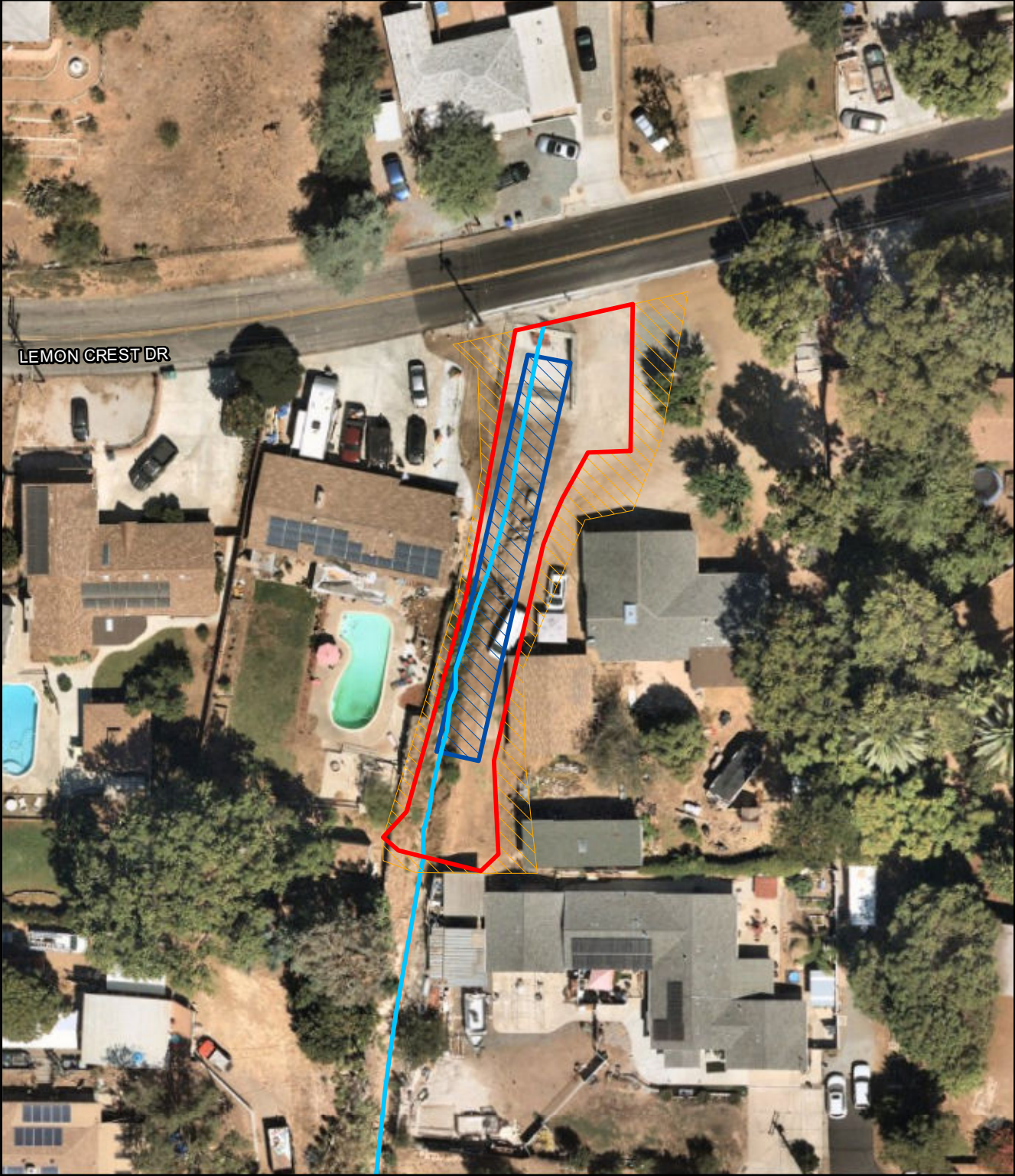




 Project Boundary

FIGURE 2
Project Location on USGS Map



-  Permanent Impact Area
-  Temporary Impact Area
-  USACE Non-wetland Waters of the U.S.,
RWQCB Non-wetland Waters of the State
-  Existing 15-foot Flood
Control Channel

0 Feet 50



FIGURE 3
Project Location and Jurisdictional
Resources on Aerial Photograph

1.2 Project Background

A previous phase of work was conducted for this project under the name Lemon Crest Drive Drainage Improvement Project which formalized the bed and bank of a flood control channel, storm drain, and associated head wall to alleviate previous flooding on Lemon Crest Drive and adjacent private property. This phase of the project work was completed in Fall 2019.

Prior to defining the limits of work for the currently proposed project, a general biological survey was conducted for the area surrounding a larger segment of the existing flood control channel on July 25, 2011 and Technology Associates International Corporation (TAIC) prepared a subsequent biological resources report on September 12, 2011 (TAIC 2011). A jurisdictional delineation survey was conducted for a larger segment on November 6, 2012 and ICF International (ICF) prepared a subsequent jurisdictional delineation report on December 3, 2012 (ICF 2012). The analysis in this memo includes the limited scope of construction as described above, and impacts are calculated based on the current project footprint.

The biological resources report for the previous phase identified two land-cover types within the project area: non-vegetated channel (Holland Classification Code 64200; Oberbauer et al. 2008) in the form of the flood control channel mentioned above (a 3- to 4-foot-wide ephemeral channel) and urban/developed land (Holland Classification Code 12000) consisting of the surrounding residential development and associated landscaped areas.

The unnamed ephemeral channel was found to exhibit an Ordinary High Water Mark (OHWM) ranging from 3 feet to 4 feet in width, with visible indicators including presence of bed and bank, break in bank slope, destruction of terrestrial vegetation, salt crust, and water staining. Prior to the installation of the storm drain inlet and culvert, flows within the channel approached Lemon Crest Drive and, due to the lack of a culvert crossing at this location, partially spread across the road as unconcentrated surface flows. Flows were then conveyed along the road for approximately 100 feet, through approximately 350 feet of private property, and into a municipal storm drain system, eventually draining to the San Diego River. The ephemeral channel on-site was found to be a non-wetland water of the U.S. and State. OHWM indicators were recorded using an Arid West Ephemeral and Intermittent Streams OHWM Datasheet (ICF 2012). A photograph from the 2012 jurisdictional delineation report showing the northern terminus of this ephemeral channel where it intersects Lemon Crest Drive is included as Photograph 1 (ICF 2012).

No special status plant or wildlife species were detected, nor were they expected to occur in the immediate project vicinity due to a lack of suitable habitat. No raptor nests were observed during the field survey. However, it was determined that the presence of mature trees provided a moderate potential for nesting raptors to occur in the vicinity of the project. Other than the potential for raptor nesting and the ephemeral channel, no other sensitive biological resources were identified or expected to occur within the project area.

As part of the previous phase completed in Fall 2019, the ephemeral channel described above was reconstructed as a natural bottom flood control channel, approximately 15 feet in width. Additionally, a reinforced concrete storm drain was installed at the northern terminus of this flood control channel where the channel intersects Lemon Crest Drive. The storm drain is an inlet to the MS4 system and was installed to run beneath Lemon Crest Drive and continue underground through private property to connect with an existing storm drain within a commercial shopping plaza. A photograph of the current conditions of the northern terminus of this ephemeral channel where it enters the storm drain inlet at Lemon Crest Drive is included below as Photograph 2.

Authorization for these previous impacts to the ephemeral channel was provided by the U.S. Army Corps of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB) via Nationwide Permit No. 12 (SPL-2018-00101) issued to the County on February 9, 2018. The permanent impacts to non-wetland waters of the U.S. and State totaled 0.005 acre and 47 linear feet.



PHOTOGRAPH 1
2012 View of Ephemeral Drainage where it
Encounters Lemon Crest Drive



PHOTOGRAPH 2
2019 View of Ephemeral Drainage where it
Encounters Lemon Crest Drive

2.0 Project Impact Analysis and Proposed Mitigation

The proposed project continues the drainage improvements of the previous phase, which was authorized to impact a total of 0.005 acre and 47 linear feet of non-wetland waters of the U.S. and State, as described above. The original 4-foot-wide ephemeral channel (as opposed to the 15-foot-wide condition of the manufactured flood control channel) is used to analyze the proposed project impacts discussed below. These proposed project impacts were not a part of permitting for the previous phase, so new agency consultation and authorization will be required.

Permanent impacts would result from the proposed project, totaling 0.13 acre within the project area. Temporary impacts would occur as a result of accessing the area immediately surrounding the permanent impact areas, totaling 0.08 acres. The temporarily-impacted areas will be recompacted and hydroseeded, and restored to provide flow connectivity with the upstream channel. Significant indirect impacts to surrounding biological resources, specifically nesting migratory birds and/or nesting raptors, could result from construction noise if species are present during construction.

2.1 Vegetation Communities/Land Cover Types

The project will result in 0.02 acre of permanent impacts but no temporary impacts to unvegetated channel. It would result in 0.11 acre of permanent impacts and 0.08 acre of temporary impacts to urban/developed land (see Figure 3). These vegetation communities are not considered sensitive, so the impacts do not require mitigation. However, the unvegetated channel would be considered a non-wetland water of the U.S. and State under the jurisdiction of the USACE, RWQCB, and the California Department of Fish and Wildlife (CDFW), and would be regulated as such. More details can be found in the Jurisdictional Resources section below.

2.2 Sensitive Plant and Wildlife Species

No sensitive plant species are expected to occur on-site or be significantly impacted by proposed project. If construction occurs during the general bird breeding season (January 15 to September 15), pre-construction surveys will be conducted in order to avoid impacts to potentially nesting migratory bird and raptor species covered by California Fish and Game Code (CFG) 3503 and 3503.5, and the Migratory Bird Treaty Act (MBTA) due to project-related noise. The pre-construction survey must be conducted within 10 calendar days prior to the start of construction. If nesting raptors are detected, a biological monitor should be present on-site as necessary during construction until all young have fledged or the nest becomes inactive in order to prevent nest failure as a result of the project. Therefore, no significant impacts are expected to occur to these sensitive bird species.

No other sensitive wildlife species are expected to occur on-site or be significantly impacted by the proposed project.

2.3 Jurisdictional Resources

Table 1 below summarizes the existing jurisdictional resources mapped within the project area and the proposed temporary and permanent impacts to them. The proposed project would cause permanent impacts to a total of 0.02 acre and 175 linear feet of non-wetland waters of the U.S. and State; no temporary impacts to non-wetland waters of the U.S. or State would occur. The impacts to 0.02 acre and 175 linear feet of non-wetland waters would result from the construction of a 175-foot box culvert and a concrete apron at the culvert inlet.

| Table 1 Project Impacts to Jurisdictional Resources | | |
|---|--|--|
| Jurisdictional Resources | Permanent Impacts in Acres (linear feet) | Temporary Impacts in Acres (linear feet) |
| USACE Jurisdictional Areas | | |
| Non-wetland Waters of the U.S. | 0.02 (175) | -- |
| CDFW and RWQCB Jurisdictional Areas* | | |
| Non-wetland Waters of the State (Streambed) | 0.02 (175) | -- |
| *CDFW/RWQCB area of jurisdiction overlap USACE jurisdictional waters. | | |

As discussed above, this impact analysis is based on the approximately 4-foot-wide ephemeral channel that existed prior to the previous phase of this project. Unavoidable impacts to jurisdictional waters as a result of this proposed project may be authorized through permit authorizations from USACE through the Section 404 Permit Program, from the CDFW through a 1602 Streambed Alteration Agreement, and from the RWQCB through a 401 State Water Quality Certification. Consultation with these agencies may result in amendments to the permits for the previous phase of this project, or a need to obtain new permits. Approved impacts to USACE, CDFW, and RWQCB jurisdictional waters may require mitigation through habitat creation and/or enhancement, and/or purchase of credits in a mitigation bank to achieve a no net loss of jurisdictional waters, as determined in consultation with the regulatory agencies. In addition, regulatory agencies may require that a buffer be maintained between jurisdictional waters/wetlands and any development.

3.0 Cumulative Impacts

Cumulative impacts are those caused by the additive effect of multiple direct and indirect impacts to a biological resource over time. No cumulatively considerable impacts are expected to occur as a result of the project due to its small scale and location within an urbanized area. Additionally, no substantial cumulative impacts are anticipated to occur to potentially nesting migratory bird or raptor species due to the small scale of the proposed project and compliance with Section 3503 and 3503.5 of the CFGC and the MBTA.

It is not expected that any local plant or animal population would drop below a self-sustaining level as a result of this project. Therefore, the project would not have a significant cumulative impact on biological resources. Through compliance with federal and state regulations, as well as implementation of the mitigation measures described in Section 2.0, project impacts to sensitive biological resources would be avoided or reduced to below a level of significance.

If you have any questions on this letter report, or require additional information, please contact me at asmisek@reconenvironmental.com or (619) 308-9333 extension 158.

Sincerely,



Andrew Smisek
Biologist

AKS:jg

4.0 References Cited

ICF International (ICF)

2012 *Jurisdictional Delineation Report for the Lemon Crest Drive Drainage Project*. December 3.

Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge

2008 Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," Robert F. Holland, Ph.D., October 1986. March.

Technology Associates International Corporation (TAIC)

2011 Biological Resources Survey and Jurisdictional Delineation for the Lemon Crest Drive Drainage Improvement Project. September 12.

U.S. Geological Survey (USGS)

1996 El Cajon quadrangle, California 7.5-minute topographical map.