BIOLOGICAL RESOURCES COMMENTS
FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS

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Introduction

Upon review of the RDEIR biological resources section, it is apparent that many of the previous biological resources comments have not been adequately addressed. Several of the primary points are summarized as follows:

- The focused surveys for all sensitive plant and wildlife species are outdated, as they were conducted between 1999 and 2001. Current USFWS protocol surveys need to be conducted for listed wildlife species, and sensitive species surveys need to be conducted for all other wildlife species.
- Updated rare plant species surveys still need to be conducted. These surveys are particularly important for Encinitas baccharis and Lakeside lilac, among others, which may not have been detectable in the closed canopy conditions that existed prior to the Cedar fire. Many rare plant species are more easily detected during post-fire conditions.
- A wildlife movement study based on field data collection has not been conducted. The RDEIR and the Biological Technical Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions. The Alliance urges the DPLU to require a wildlife tracking study be conducted for purposes of a wildlife corridor analysis, or, alternatively, use the independent study conducted by the San Diego Tracking Team and submitted by the Alliance (attached).
- The RDEIR concludes erroneously and without evidence, as did the previous DEIR, that the Salvation Army property does not contain a habitat linkage and is therefore exempt from the Design Criteria for Linkages and Corridors within the MSCP Findings of Conformance.
- The project alternatives continue to fail to meet the standards necessary to conform to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan. The project therefore, cannot be approved.

Additional new areas of concern raised by the RDEIR revisions include the new buffer analysis, the new RPO wetlands interpretations and reduced wetland area reported, and the new wildlife corridor assumptions presented without supporting evidence.

An assumption is made in the RPO wetland analysis that the Central Camp Tributary Drainage and Southern Camp Drainages should no longer be considered RPO wetlands because they have low functions, that they do not support sensitive species, and that they are not part of a wildlife corridor. Insufficient evidence is given to support such

statements. Furthermore, the 2007 RPO definition of wetlands only makes reference to using "negligible biological function or value" to exclude an area as wetland for "lands that have wetland attributes solely due to man-made structures (i.e., culverts, ditches, road crossings, agricultural ponds)". These onsite drainages do not exist solely due to man-made structures. They also have not been degraded by *past legal land disturbance* activities to the point that they 1) have negligible biological function or value *even if restored to the extent feasible*. The RDEIR interpretation of RPO wetlands is faulty and does not adhere to the 2007 RPO wetland definition.

General Comments

The focused surveys for all sensitive plant and wildlife species are outdated, as they were conducted between 1999 and 2001. Additionally, ecological conditions in the immediate area are significantly different because of the recent Cedar fire in October 2003 and the variation in climatic conditions over the last 9 years. Substantial new information will have to be reported to comply with California Environmental Quality Act (CEQA), Federal Endangered Species Act (FESA), and California Endangered Species Act (CESA) requirements. The U.S. Fish and Wildlife Service (USFWS) typically considers all threatened and endangered (T&E) species surveys to be valid for only one year following completion of protocol surveys, and 2 to 3 years for all other species surveys. The California Department of Fish and Game (CDFG) has similar standards and will also require updated focused sensitive species surveys. This substantial new information should be publicly disclosed and a new draft EIR recirculated for public comment.

Current focused/protocol surveys will need to be conducted for listed wildlife species with a potential for occurring onsite or *within 500 feet of the parcel boundaries* (because of the potential for indirect impacts). These species surveys should include California gnatcatcher, least Bell's vireo, Stephen's kangaroo rat, arroyo toad, and Quino checkerspot butterfly. Current focused surveys should also be provided for other sensitive wildlife species (e.g., bats, reptiles, raptors including golden eagle, and other sensitive avian species).

An updated focused survey for all potentially occurring rare plant species should be conducted. The high rainfall this 2004/2005 rainy season has resulted in display of more plant species in many areas than found over the previous several years of drought. Particular attention should be focused on Encinitas baccharis (federally and state listed) and lakeside lilac. Encinitas baccharis has a high likelihood of occurrence on the property given that it is known from Iron Mountain and suitable habitat exists onsite. Furthermore, this species is extremely difficult to detect in dense chaparral even if surveys are conducted during the appropriate blooming period due to its cryptic appearance, growth habit within and sometimes under dense brush, and the impenetrable nature of mature chaparral. Encinitas baccharis responds with increased numbers and density after wildfire and is much easier to detect after the habitat has opened up post-fire and become accessible on foot. Similar parameters apply to lakeside lilac, which is also known from the Iron Mountain foothills and also responds well to wildfire.

A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts. The RDEIR and Biological Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions.

The County requires mapping of wetland buffers of a minimum of 25 feet and a maximum of 200 feet depending on a number of factors, which are listed in the County's Biological Mapping Requirements. The County's 2007 RPO requires a wetland buffer of between 50 to 200 feet. Presumably, if all of the factors are positive, the maximum buffer width of 200 feet would be most appropriate. These include 1) existence of hydrophytic vegetation, 2) high quality condition of the existing wetland, 3) wetland/buffer serves as a wildlife corridor, 4) existence of sensitive species, and 5) connectivity and high quality condition of the wetland up and down stream. Even for the areas in which all of the factors listed have been determined positive, as shown in the Biological Technical Report, a buffer width of only 100 feet is provided. Additionally, the buffer analysis does not provide evidence for a lack of wildlife corridors, sensitive species, and high quality/condition of habitat for those wetlands displaying lower values. **The validity of the buffer analysis is questionable, as is the appropriateness of the buffer widths to protect the environmental and functional habitat values of the wetlands.**

Given the onsite conditions, the maximum buffer width of 200 feet should be applied to the West Fork and tributary drainages. The Central and South Camp drainages also contain coast live oak riparian forest, and should maintain a substantial buffer to adequately protect these wetlands. The buffer needs to be of an appropriate size to be integrally important in supporting the full range of wetland and the adjacent upland biological community. These buffer areas are currently only shown as having a 50-foot buffer width.

Attachment A of the California Department of Fish and Game (CDFG) letter was missing from the RDEIR. This attachment provides the list of Rare Natural Communities, which CDFG requires be fully avoided by the project.

MSCP Findings of Conformance

It is stated in the EIR and Findings of Conformance that the project site is located within the Multiple Species Conservation Program (MSCP), outside of any pre-approved mitigation area. This statement is incorrect for two reasons. A portion of the site is within the MSCP pre-approved mitigation area in the southwest corner of the site (refer to map on last page of Findings). Secondly, the Salvation Army property is fully encompassed within a preserve acquisition area identified by CDFG and the County in the Conceptual Area Acquisition Plan (CAAP) for Iron Mountain Ridge – Canada de San Vicente Preserve. The CAAP was approved and adopted by the County and CDFG in 1999. The CAAP, in conjunction with the MSCP, has resulted in the acquisition of approximately 2,714 acres of habitat bordering the Salvation Army property. The

preserve includes the former Boys and Girls Club property and the Boulder Oaks Ranch, which were identified in the CAAP as the top two acquisition priorities. The Salvation Army property along with several other parcels, collectively referred to as the Iron Mountain Palisades – Golden Eagle Nest Area, are identified in the CAAP as the third acquisition priority for the preserve.

The following discussion is relevant to the **Design Criteria for Linkages and Corridors, numbers 1 to 10**. Within the MSCP Findings of Conformance, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material."

A wildlife movement study based on field data collection has not been conducted. The RDEIR and the Biological Technical Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions. The Alliance urges the DPLU to require a wildlife tracking study be conducted for purposes of a wildlife corridor analysis, or, alternatively, use the independent study conducted by the San Diego Tracking Team and submitted by the Alliance (attached).

The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be impinged by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. Therefore, the MSCP Findings of Conformance cannot be supported.

The BMO Project Design Criteria (page 5, number 1) require that project development shall be sited in areas to minimize impact to habitat. **The BMO Preserve Design Criteria and Subarea Plan Findings** require measures to maximize the habitat structural diversity of conserved habitat areas (page 6, number 2; page 13, number 2); provide for the conservation of spatially representative examples of coastal sage scrub and other high value habitats (page 7, number 3; page 12, number 3); and provides for development in the least sensitive habitat areas (page 7, number 5; page 13, number 5).

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types **(BMO Criteria 1**); and that development has been focused on the habitat types with the lowest sensitivity **(Preserve Design Criteria 5)**. A detailed habitat area based analysis indicates otherwise. The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on

the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. In addition, the project proposes impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing).

Although a lower percentage of the high elevation coastal sage /chaparral scrub would be impacted by the project (18%), this habitat does not contain the same value as the lower elevation Diegan coastal sage scrub in terms of potential for California gnatcatcher and other sensitive coastal sage scrub-dependent species. The Diegan coastal sage scrub onsite is a highly diverse and high quality habitat. Some areas contain Engelmann oak woodland interspersed.

One-third of all coast live oak woodland would be impacted (34%). Note that although a smaller percent of the coast live oak riparian forest acreage would be impacted (4%), a substantial length of the wetlands along this riparian corridor (more than half the total length of the riparian habitat) may be impacted by road improvements including clearing for fire protection and foot traffic. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria.

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5 in the EIR). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative I as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development.

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3. The project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted, are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR).

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. Open grassland habitats are valuable for eagle foraging, contrary to the conclusions made in the RDEIR; whereas the native closed canopy shrub lands would be of less critical importance for foraging.

Conclusion. Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable.

MSCP Conformance Findings cannot be made for the following reasons:

- The regional habitat linkage made up by both north-south and east-west wildlife movement corridors has not been maintained (Design Criteria for Linkages and Corridors 1-10)
- Project development is not sited in areas to minimize impact to habitat (BMO Criteria 1)
- Habitat structural diversity of conserved habitat areas is not maximized (BMO Preserve Design Criteria 2 and Subarea Plan Findings 2)
- Conservation of spatially representative examples of coastal sage scrub and other high value habitats are not provided (BMO Preserve Design Criteria 3 and Subarea Plan Findings 3)
- Development is not focused in the least sensitive habitat areas (BMO Preserve Design Criteria 5 and Subarea Plan Findings 5)
- Special emphasis has not been placed on conserving adequate foraging habitat near golden eagle nest sites (Subarea Plan Finding 7)

Alternatives I, II, and proposed project each fail to meet the standards necessary to conform to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan.

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved.

Specific EIR Comments

The following comments are made in reference to the DEIR page numbers; however, the comments are still relevant to the RDEIR as complete corrections have not been made in response to these comments.

Page 2.2-1 and Figure 2.2-1. No Engelmann oak woodland as a habitat type was mapped or described despite some of the habitat onsite containing substantial numbers and cover of this species, if not a dominance. Please explain.

Page 2.2-6 Sensitive Plant Species. There is no mention of sensitive plant species that have a potential to occur onsite, but that were not detected during surveys, such as Encinitas baccharis and Lakeside lilac, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations.

Page 2.2-7 Sensitive Wildlife Species. There is no mention of sensitive wildlife species that would have a potential to occur onsite, but that were not detected during surveys, such as bat species, ringtail, and mountain lion, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations.

Page 2.2-9 Wildlife Corridors. No wildlife movement studies were done. The primary argument made in the EIR wildlife corridor section is that there is insufficient habitat connectivity to the north, east, and south for a regional corridor to exist. There is no evidence to substantiate this claim.

The author of these comments is a professional biologist of 20 years and was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). The following analysis is based on current aerial photographs, USGS topographic maps, and regional vegetation mapping. Additionally recent field visits to surrounding properties and several years of wildlife tracking and hiking in the region (including the Salvation Army property), indicate the following results.

The Salvation Army property is bordered by unencumbered open space around most of its perimeter and provides an important regional connection between existing large blocks of open space. The few scattered residences in this area along Mussey Grade Road have little effect on north-south movement of wildlife, but have some effect on restricting east-west movement to key drainages that connect Iron Mountain Open Space via Salvation Army to the large blocks of open space to the east. Existing ranchland and equestrian uses on adjacent properties do not block the major wildlife travel routes. The Salvation Army property clearly and undeniably contains a regional habitat linkage.

The EIR only discusses one wildlife corridor. However, an important set of corridors on the Salvation Army property form a regional habitat linkage. This linkage is encompassed by the valleys and lower slopes of oak woodland, coastal sage scrub, grassland, and chaparral along the eastern portion of the site. These valleys and lower slopes connect offsite habitats to the north from Dos Picos County Park, and Golden Eagle Ranch West with the offsite habitats to the south on the Boulder Oaks Ranch Preserve (via two routes: Wildwood Ranch and the Heller/Meador Ranches). An interconnected series of broad, wooded meadows extend through all of these properties and then drop down via the steep Foster Canyon into MSCP Preserve (former Boys and Girls Club), San Vicente Reservoir open space and beyond. The Salvation Army linkage is also important because it helps maintain the broader east-west connections between Iron Mountain and undeveloped high quality habitats extending east of the West Fork of San Vicente Creek ultimately into the BLM open space, Monte Vista Ranch, Barona Indian Reservation, Oak Oasis Park, Silverwood Wildlife Sanctuary, and Cleveland National Forest.

Onsite movement corridors associated with this linkage include a short portion of the West Fork of San Vicente Creek, the east-west corridor along a tributary creek to the West Fork, and the major north-south wildlife corridor in this region. The onsite portion of this north-south corridor includes a broad valley from the south (wooded meadows and scrub), the lower slopes around a central hill including trails and dirt road, a trail that drops into the tributary creek, and a north-south branch of tributary creek that leads offsite to the north.

The onsite habitat linkage is also important for genetic exchange of plant and animal species on a regional basis, particularly for those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

These wildlife corridors and habitat linkage must be addressed and thoroughly evaluated. A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts.

Page 2.2-12. Analysis of Project Effects and Determination of Significance.
Please clarify that indirect impacts to oaks were calculated based on distances from the edge of canopy and not from the trunk (i.e., canopy edge of oak trees within 25 feet from ground altering impact or 20 feet from waterline and other trenching activities).

Please provide a map clearly showing all infrastructure impacts, including permanent and temporary impact zones for trenches, leach fields, other septic and water related infrastructure, improvements to trails or construction of new trails, etc.

Why would there be no substantial change in foot traffic between existing and proposed staff housing?

Page 2.2-13 Tier I Habitats. It is not clear how impact acreages for oaks were derived. Please explain how indirect impacts were assessed. Were oak trees indirectly impacted through soil compaction and other root zone impacts included in the impact calculations? Indirect impacts to oak trees from the unseasonal persistence of water near new leach fields, irrigated landscape, and other water sources needs to be addressed.

An oak tree inventory, including trunk diameters and canopy widths for both oak tree species should be conducted. How many coast live oak trees will be removed by the project, and how many are expected to be lost over time through compaction, unseasonal water, or other impacts to their root zone?

How were impacts assessed for the coast live oaks trees that were not mapped within oak woodland habitat? Is it true that certain oak trees were deemed not to have biological value because of understory impacts and were not included in the impact analysis?

Describe where the wetland impacts will occur and why they cannot be avoided. The project should be designed to avoid impacts to 0.10 acre of wetlands from foot traffic. The ACOE and CDFG generally do not issue permits for wetland impacts that they consider avoidable.

Page 2.2-15. Sensitive Plant Species. Indirect impacts to Ramona horkelia, Gander's butterweed, and felt-leaved monardella are not adequately addressed. These species populations lie immediately adjacent to the hiking trails that will become heavily impacted by potential use from up to 748 users per day. There are no assurances that there are adequate means to protect them from a heavy stream of camp users. Fencing would impact the populations, but signs and foot stakes would be inadequate to protect the populations from such heavy use.

Page 2.2-16. Sensitive Wildlife Species.

The impact section is incomplete, as it does not address impacts to all of the sensitive wildlife species detected on the project site, nor to the species that are likely to occur onsite but not detected during surveys.

Sensitive wildlife species surveys are outdated and would no longer be considered valid by the USFWS and CDFG. Therefore, an accurate impact analysis for sensitive wildlife cannot be completed even if attempted from existing data. Current focused surveys should be conducted for all sensitive wildlife.

The Salvation Army is part of an important foraging area for golden eagles. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. The conversion of this important eagle foraging habitat to developed and fragmented lands would be significant.

Page 2.2-16. Edge Effects.

The analysis of edge effects or indirect impacts from the project is inadequate. Numerous adverse effects to biological resources will occur that have not been addressed. A few of these impacts include invasion of exotic species from increased disturbance, erosion of creek banks, sedimentation, runoff, contamination from pesticides, herbicides, nitrates, and other pollutants. Significant impacts would occur from the heavy use of habitats throughout the property by camp users. These impacts should be individually addressed and may include the following: trampling of vegetation; soil compaction; erosion from hiking and biking; collecting of plants and wildlife (such as horned lizards); digging; wood cutting; removal of dead wood and leaves; building dams; use of bright flashlights; nighttime noise; discarding trash; discarding food which facilitates invasion of Argentine ants; urinating and defecating in creeks and other habitat areas; unauthorized shooting, trapping, smoking, camp fires, fireworks, and explosives.

Page 2.2-17. Pruning oak branches after trenching within their root zone does not reverse the damage done to trees through root severing. Pruning in excess of 10 percent of the tree is in itself an adverse impact that increases the tree's susceptibility to disease and decreases vigor. Once thought to be essential, it is no longer recommended to prune the canopy in an amount commensurate with root loss. Canopy pruning would constitute an additional impact rather than mitigating the impact from root loss.

Further, this mitigation measure does nothing to address the significant impacts of irrigation, soil compaction, and filling and paving in and around the oaks. These impacts remain significant and unmitigated.

It does not follow that landscaping without using invasive exotics mitigates for the spread of pre-existing invasive species caused by habitat disturbance. This impact should be mitigated proactively by adopting an adequately funded adaptive management program to remove exotic species invasions on an ongoing basis. The Findings of Conformance state that native landscaping is to be used onsite. This should also be incorporated as a mitigation measure for significant impacts from the threat of increased invasion of exotic species.

Page 2.2-17. Consistency with Applicable Habitat or Natural Community Plans. Impact 2.2.1 refers to non-compliance of the proposed project to design criteria in the BMO. The project Alternatives I and II also do not comply with the criteria of the BMO and MSCP Subarea plan for the following reasons:

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types (BMO Criteria 1); and that development has been focused on the habitat types with the lowest sensitivity (Preserve Design Criteria 5). A detailed habitat area based analysis indicates otherwise.

The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. Impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing) are proposed. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria.

The project fails to comply with the impact-avoidance design criteria in the BMO, Article V, Section A1.

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative I as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development under Alternative I.

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3, the project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR).

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks

Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. This habitat would therefore become severely degraded and of limited value for eagle foraging.

Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable. The proposed project and Alternatives I and II fail to meet the standards necessary to conform with the BMO Project Design Criteria and Preserve Design Criteria and to conform with the objectives of the County MSCP Subarea Plan.

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved.

Page 2.2-18. Wildlife Corridors

The following discussion is relevant to the Design Criteria for Linkages and Corridors, numbers 1 to 10. Within the EIR, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material."

No wildlife movement studies were done. As detailed in comments above for page 2.2-9 Wildlife Corridors, the Salvation Army property is clearly and undeniably a habitat linkage and provides an important connection between existing large blocks of open space. The onsite habitat linkage is important for regional movement of wildlife as described earlier, and genetic exchange for plant and animal species, particularly those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

The proposed project and alternatives would impact the majority of habitat within this onsite linkage. The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be impinged by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. The proposed project and Alternatives I and II do not conform with the BMO Design Criteria for Linkages and Corridors, numbers 1 to 10. Therefore, the BMO findings necessary to approve the project cannot be made.

Bonnie Hendricks, M.S. Biology

The author of these comments is a professional biologist of 20 years in San Diego County. Her expertise includes vegetation ecology, rare plant surveys, wetland delineation, and wildlife biology. She has extensive experience with CEQA and MSCP issues, including conformance findings. Her comments on the biology are based on review of the existing technical documents and an independent analysis using current aerial photographs, USGS topographic maps, and regional vegetation mapping. She has an intimate familiarity with the project area due to wildlife tracking and hiking in the region. She has accumulated years of observations on the following key properties (as well as other smaller parcels): Salvation Army (formerly First Presbyterian Church), MSCP Open Space Preserve (formerly Boulder Oaks Ranch and Boys and Girls Club property), Iron Mountain Open Space, Dos Picos Park, San Vicente Reservoir (City of San Diego), Sycamore Canyon Preserve, Mount Woodson Open Space, Wildwood Ranch, Meador Ranch, former Bud Heller Ranch, holdings of Morgal, Conklin, Klopp and Levin, BLM Open Space, Monte Vista Ranch, Barona Indian Reservation, Silverwood Wildlife Sanctuary, Oak Oasis Park, and Steltzer Park.