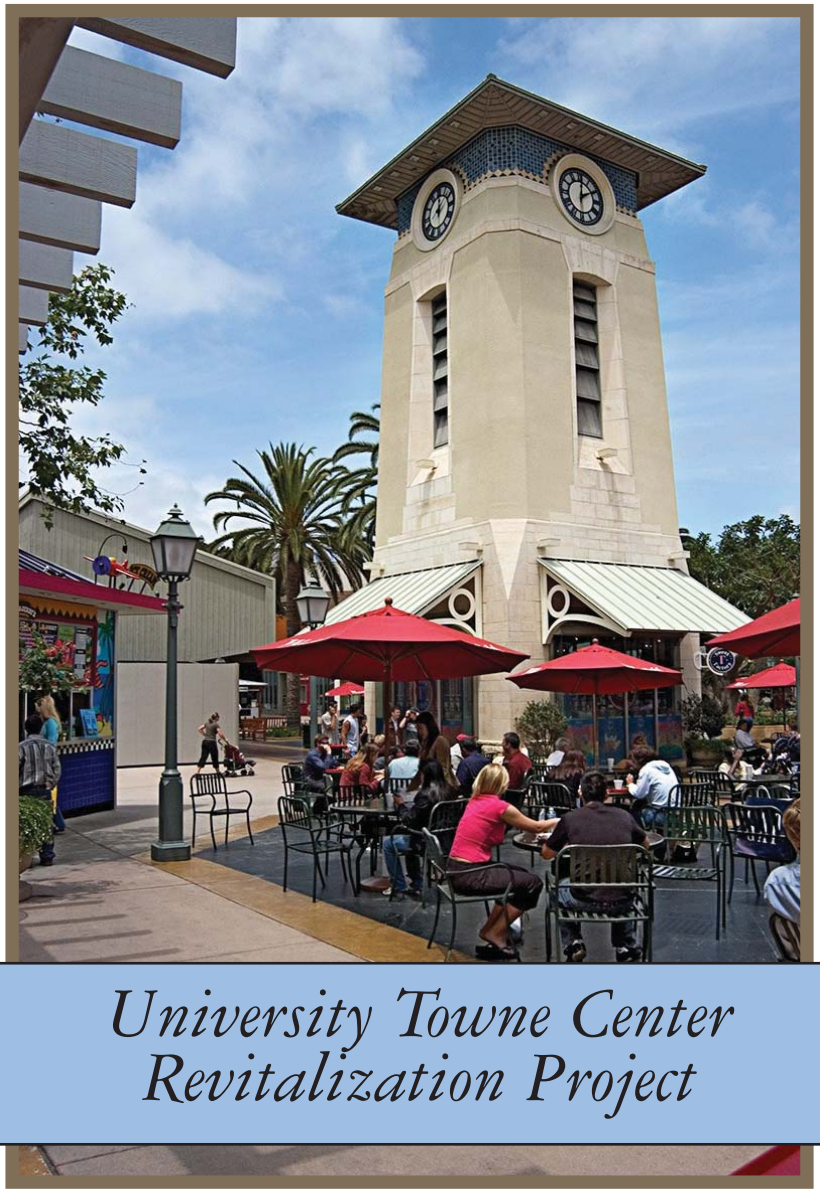
Technical Appendix N:
Environmentally Sensitive Lands Review - Biology

to the

Final Environmental Impact Report



University Towne Center Revitalization Project

SCH No. 2002071071 LDR No. 41-0159/PTS No. 2214

Prepared By:
HELIX Environmental Planning, Inc
7578 El Cajon Boulevard, Suite 200, La Mesa, California 91941

Prepared For:
Westfield Corporation
402 West Broadway, Suite 2050, San Diego, California 92101

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HELIX environmental planning, inc.

7578 El Cajon Boulevard, Suite 200
La Mesa, CA 91941
fax (619) 462-0552
phone (619) 462-1515

Inland Empire Office
phone (951) 328-1700

March 13, 2008 WCI-02

Mr. Greg Fitchitt
Development Director, Westfield UTC
402 W. Broadway, Ste. 2050
San Diego, CA 92101

Subject: Environmentally Sensitive Lands Assessment of the Westfield UTC Revitalization Project

Dear Mr. Fitchitt:

This letter summarizes the results of HELIX Environmental Planning, Inc.'s (HELIX's) assessment of the Environmentally Sensitive Lands (ESL) containing biological resources occurring on the proposed Westfield University Town Centre (UTC) Revitalization project site located in the northern portion of the City of San Diego, California.

Introduction

The portion of the UTC Revitalization project site studied in this letter is the approximately eight (8) acre area located west of Towne Centre Drive, between Via Andar and Montrose Way, and south of the commercial portion of the property associated with the Westfield UTC Shopping Center, in the University Towne Centre (UTC) area of the City (City) of San Diego, California (Figure 1). It is identified in the proposed Master Planned Development Permit (PDP) as the Torrey Trail area of the larger UTC Revitalization project site. The Torrey Trail area consists of a northwest to southeast narrow canyon-like feature, with mostly manufactured slopes and an open groomed park-like entrance off of Towne Centre Drive. The area supports mostly non-native vegetation and includes a paved walkway from Towne Centre Drive to the UTC Shopping Center. The site also supports small strips of disturbed native vegetation on the slopes in the southern portion of Torrey Trail. Surrounding land uses include residential development immediately adjacent to the east and west, with the UTC Shopping Center adjacent to the north, and commercial development to the south, across Towne Centre Drive (Figure 1).

The UTC project site, including the Torrey Trail area, is within the Urban Areas of the City's Multiple Species Conservation Program (MSCP) Subarea Plan; however, it is not within or adjacent to a Multi-Habitat Planning Area (MHPA). The MHPA delineates core biological resource areas and corridors targeted for conservation. These areas have been determined to provide the necessary habitat quantity, quality, and connectivity to support the future viability of San Diego's

unique biodiversity and thus are considered to be a Sensitive Biological Resource. Development is limited in MHPA areas; however, the UTC site is neither in nor adjacent to any MHPA areas.

Definitions

The City of San Diego Biology Guidelines and ESL regulations define sensitive biological resources as those lands included within the MHPA as identified in the City's MSCP Subarea Plan, wetlands and other lands outside of the MHPA that contain vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered or threatened species; or narrow endemic species (see San Diego Municipal Code Section 113.0118). The four level tier system is based on sensitivity, with first tier including the most sensitive and the fourth being the least, based on rarity and ecological importance.

On-site Sensitive Biological Resources/ESL

A reconnaissance of the Torrey Trail area was conducted on February 29, 2008. The reconnaissance consisted of a walk-thru, habitat mapping and general wildlife observations. During the reconnaissance, it was observed that the Torrey Trail area primarily contains developed land with ornamental landscaping but also supports three vegetation communities considered sensitive biological resources under the ESL regulations: coastal sage scrub-disturbed (Tier II), southern mixed chaparral-disturbed (Tier IIIA), and coast scrub oak (*Quercus dumosa*) chaparral-disturbed (Tier IIIA). Coast scrub oak chaparral is a sub-set of southern mixed chaparral (Figure 2, Table 1).

Table 1
EXISTING SENSITIVE VEGETATION COMMUNITIES/HABITATS

VEGETATION COMMUNITY/HABITAT*	ACRE(S)
Tier II	
Diegan coastal sage scrub-disturbed (32520)	0.23
Tier III	
Southern mixed chaparral-disturbed (37120)	0.90
Scrub oak chaparral-disturbed (37120)	0.23
TOTAL	1.36

*Categories and codes are from Holland (1986) and Oberbauer (1996)

Assessment of On-site Sensitive Biological Resources/ESL

Although the Torrey Trail area supports three sensitive vegetation communities, these areas appear to be remnant undeveloped strips of lands left over from the original development of the adjacent subdivisions on both sides of the canyon and the graded open space area below. All three habitats are disturbed and support a high number and cover of non-native invasive exotic plant species. They are also exposed to high levels of noise and lighting from the adjacent urban developments on all sides of the Torrey Trail area and traffic activity along Towne Center Drive. In addition, these areas are isolated by urban development from any other native habitat occurring in the vicinity of the project. Because of the afore-mentioned factors, these areas lack the quantity, quality, and connectivity needed to support or contribute to the long-term viability of the local biological diversity.

The potential for sensitive plant or animal species is low because of the degraded habitat quality and lack of connectivity to native habitat. No sensitive species observations were made during the field reconnaissance conducted for this analysis.

Project Impacts

Direct Impacts

The Torrey Trail improvements proposed in the Master PDP would not directly impact or encroach into the on-site ESL (Figure 2). The Torrey Trail area improvements may include pedestrian lighting, a tot lot, benches, picnic tables, new landscaping and/or other park-like amenities; the balance of the area would remain as landscaped open space. A 7- to 10-foot buffer from the sensitive biological resources is proposed between any potential improvements and the ESL. Although the design for the Torrey Trail improvements will be refined in the future with public input, the Master PDP for the UTC project specifies that no encroachment into ESL shall be permitted. To ensure its protection, a covenant easement will be recorded across all ESL on the premises pursuant to San Diego Municipal Code Sections 143.0140(a) and 143.0152(a). Therefore, the proposed project would have no direct impact on ESL.

Indirect Impacts

Although the project area is not within the MHPA, the Land Use Adjacency Guidelines were used for guidance when assessing potential indirect impacts to the on-site ESL habitats. An indirect impact consists of secondary effects of a project, including dust and noise from construction activities, changes in hydrology and fire regime that can affect plant species composition, decreased water quality from urban runoff, increased lighting, vehicular noise, increased human intrusion, invasion by exotic species, and habitat insularization. The magnitude of an

indirect impact can be the same as a direct impact, but the effect often takes longer to become apparent.

Drainage/Water Quality

The proposed improvements of the site will be located at the base of the ESL slopes. The improvements to Torrey Trail will include additional park-like amenities in order to satisfy the City's population-based park requirements and certain drainage improvements. Torrey Trail is already developed and none of the proposed improvements would encroach into the ESL or, result in an increase in urban runoff into the on-site ESL. Therefore, no significant indirect impact would result from urban runoff.

Night Lighting

Night-time lighting on native habitats can provide nocturnal predators with an unnatural advantage over their prey. Night lighting may expose wildlife species to an unnatural light regime and alter their behavior patterns, possibly resulting in a loss of species diversity. The Torrey Trails area is surrounded on all sides by urban development, including a major road and residential housing, resulting in an existing edge condition that currently causes the habitat to be illuminated on a regular basis. Any additional lighting associated with the Torrey Trail improvements would be of the lowest illumination allowed for pedestrian safety, selectively placed, shielded, and directed away from the ESL on the slopes. In addition, it would comply with City regulations and would be further screened by the existing mature vegetation (trees) that are situated in that portion of the site. Therefore, no significant indirect impact would result from night lighting.

Construction/Operational Noise

Noise has the potential to interfere with wildlife vocalizations and breeding success if it were to occur during the breeding season. The project site is located outside the MHPA and no MHPA exists anywhere nearby. In addition, there is little to no potential for sensitive bird species to occur in the habitats contained on site. The amount of noise possibly generated during the construction of Torrey Trail improvements would depend on the type of improvements constructed but would be minimal in comparison to the existing noise environment. Furthermore, no noise restrictions are placed on projects located outside the MHPA. Therefore, potential construction noise impacts to sensitive species are not considered a significant indirect impact.

In terms of operational noise, the ESL is already exposed to elevated noise levels due to the surrounding urban uses. The proposed improvements in the Torrey Trail area would not be high noise generators because of the presence of local

residences nearby. Therefore, the potential operational noise impacts would not be considered a significant impact.

Fugitive Dust

Dust released through potential construction activities could disperse onto vegetation. Dust-induced shading could reduce plant productivity. However, dust may be controlled through the implementation of air quality measures identified in the Final EIR for the UTC Revitalization project. Those measures include the application of water on unpaved, unvegetated surfaces during construction activities. Therefore, no significant indirect impact would result from fugitive dust.

Invasive Plant Species/Habitat Insularization

Non-native plants can colonize sites disturbed by construction and potentially spread into adjacent native habitats. Many non-native plants are highly invasive and can displace native vegetation, reduce native species diversity, potentially increase flammability and fire frequency, change ground and surface water levels, and potentially adversely affect native wildlife that is dependent on the native plant species. As noted above, non-native vegetation already occurs above and below the ESL habitat and a large proportion of invasive non-native plant species already exist within the habitats. Any landscaping associated with the park improvements would not be invasive in nature, as specified in the Master PDP, so that the existing condition would not worsen. Therefore, no significant indirect impacts relating to the introduction of invasive species would result.

Human and Pet Intrusion

Human and pet intrusion into the surrounding natural areas can often occur following development. The residential development adjacent to the Torrey Trails areas has already impacted the slopes by introducing domestic pets into the ESL and creating informal trails through the open space. The proposed park improvements will not increase human or pet activity in the ESL because no new trail connections are planned and park uses would not attract more pet activity than already exists today. Therefore, no potential for significant indirect impacts from human and pet intrusion exists.

Brush Management

Brush management, involving the selective removal of large plants and thinning of vegetation, can result in the loss of habitat value and/or invasion of non-native plants. The improvements proposed in Torrey Trail would not involve the construction of habitable structures that would require brush management

measures. Therefore, no significant indirect impacts from brush management would occur.

Grading/Land Development/Erosion

Errant impacts to habitat can occur when construction interfaces directly with sensitive habitats and accidental encroachment occurs. Any grading required to implement the Torrey Trail improvements would not be permitted to encroach into ESL areas on site as noted above under the Direct Impacts section of this letter report. In addition, a 7- to 10-foot buffer between proposed improvements and ESL would be maintained throughout any construction activities. No erosion impacts are anticipated since the improvements would occur below the ESL areas and Best Management Practices (BMPs) would be installed as required under the City stormwater regulations. Therefore, no significant indirect impacts from grading/development would occur.

Wetland Buffer

The ESL area does not include any wetland areas; therefore, no wetland buffers are required.

Summary

The proposed project footprint, as designed, would not directly or indirectly impact the on-site ESL and would allow for its continued existence.

If you have any questions regarding this report, please call Dr. Derek Langsford or me.

Sincerely,

Douglas Allen
Biologist

Enclosures: Figure 1 Regional Location Map
Figure 2 Sensitive Habitats / Impacts

REFERENCES

City of San Diego (City). 2002. San Diego Municipal Code, Land Development Code, Biology Guidelines. July.

1997. Multiple Species Conservation Program. City of San Diego MSCP Subarea Plan. March.

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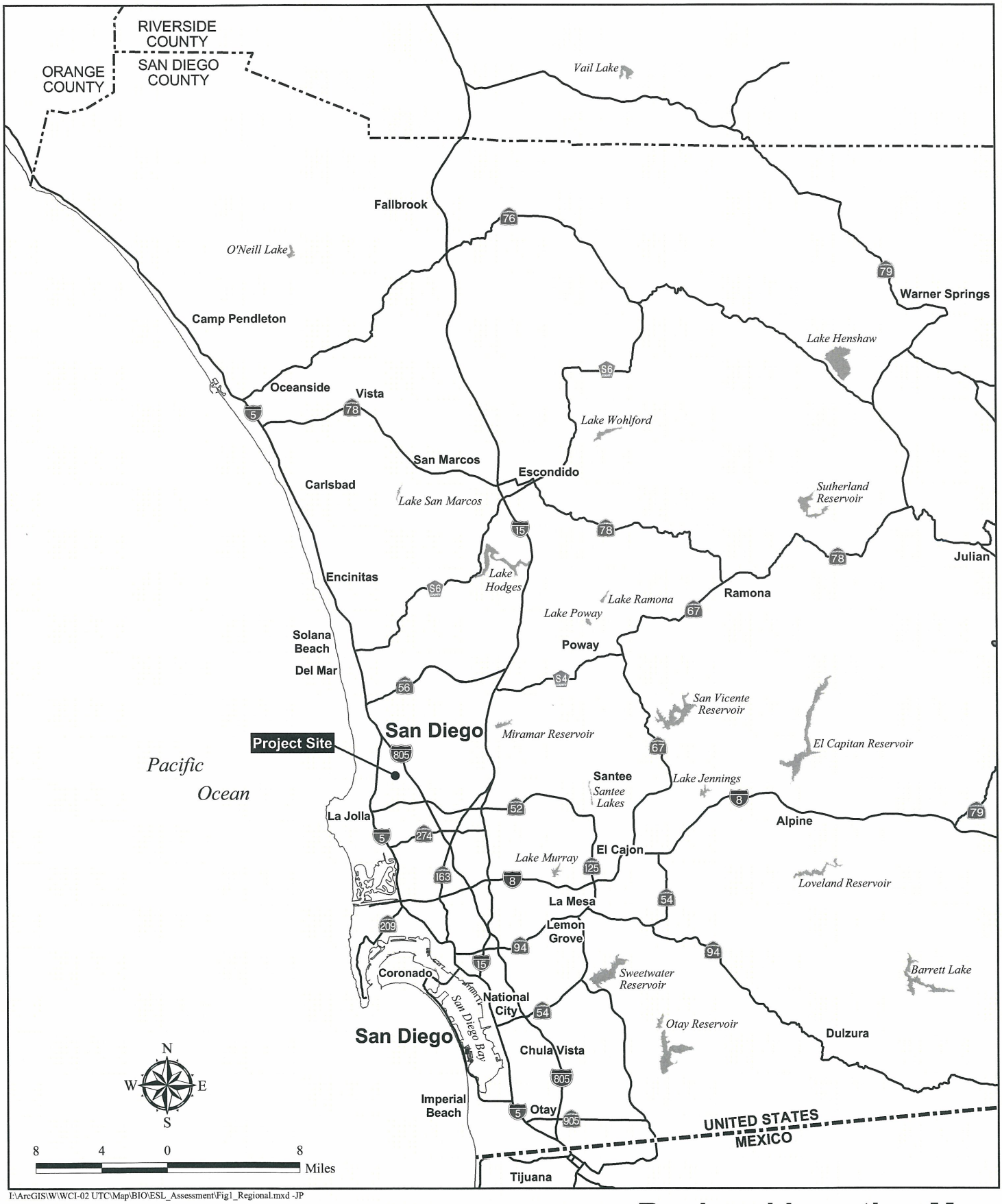
Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Nongame-Heritage Program, State of California, Department of Fish and Game, Sacramento, 156 pp.

Oberbauer, T. 1996. Terrestrial vegetation communities in San Diego County based on Holland's Descriptions. San Diego Association of Governments, San Diego, California. 6 pp.



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Regional Location Map

UTC REVITALIZATION PROJECT

Figure 1

Sensitive Resources/Impacts

UTC REVITALIZATION PROJECT

Figure 2