DMEC

PROJECT REFERENCE NO. SD05-0059 (CCC-PM 5641 and PMW-LLA SD05-0060)	**PROJECT PLANNER:** Debbie Morrisset
DATE: 12 January 2006 Field visit 6 January 2006	**PROJECT BIOLOGISTS:** David L. Magney, Cher Batchelor, and Wendy Cole of David Magney Environmental Consulting (DMEC)

PROJECT LOCATION: The project sites are located above and to the northwest of the Ojai Valley. There are two project sites, one located in the McDonald Canyon subwatershed, and the other on a ridgetop between the Cozy Dell and McDonald Canyon subwatersheds of the Ventura River, in the County of Ventura, north of Fairview Road, which is the nearest road. The project site includes the southwestern quarter of the southeastern quarter of Section 34, and the southwestern quarter of the southwestern quarter of Section 35, of Township 5 North, Range 23 West, Matilija, California Quadrangle (USGS 7.5 minute Series Topographic Map). DMEC botanists surveyed two distinct sites, one in each parcel. Site 1 is located in the southwestern portion of Parcel 1, near the water tank. Site 2 is located in the approximate center of Parcel 2 on a ridgetop.

PROJECT ADDRESS: APNs: 010-0-070-310 (25 acres), and 010-060-070 (149 ac).

PROJECT DESCRIPTION: Mr. Simmons is requesting to legalize a 25.48-acre parcel with CCC-PM (conditioned to meet 80 acre zoning) and PMW-LLA SD05-0060 to adjust lines between two "legal" lots to create Parcel 1 – 80.47 acres and Parcel 2 – 87.14 acres.

ENVIRONMENTAL SETTING: Building pads for Site 2 have been cleared and graded previously, and Parcel 1 has been cleared of vegetation as well. A dirt access road connects the two parcels. There is development adjacent to Site 1: a tennis court and associated buildings, and a water tank. Hillside agriculture exists downslope and adjacent to Site 2, and a fire line has been cleared extending from the parcel and up the hill to the north toward the Los Padres National Forest property. Elevation ranges from approximately 960 to 1,200 feet in elevation (above mean sea level).

At least 64 plant species were directly observed onsite by DMEC during the field survey on 6 January 2006. Table 1, Plant Species Observed at the Simmons Property, lists all plant species observed during the DMEC biological resources survey. DMEC also conducted a search of the CDFG's California Natural Diversity Database (CNDDB) RareFind3 (CDFG 2005) to account for all CNDDB-tracked (and reported) special-status plant and wildlife species and habitats in the vicinity of the project site. Special-status plant species are discussed in further detail below, and the results table of the CNDDB search is provided at the end of this study.

The property is currently owned by Sherman Simmons, whose address is 3711 Industrial Rd. #6, Las Vegas, NV 89109.

Table 1. Plant Species Observed at the Simmons Property

Site	Scientific Name[1]	Common Name[2]	Habit[3]	Family
FUNGUS				
2	*Coriolus versicolor*	Many-colored Polypore	F	Polyporaceae
VASCULAR PLANTS				
2	*Adenostoma fasciculata*	Chamise	S	Rosaceae
1	*Artemisia californica*	California Sagebrush	S	Asteraceae
2	*Astragalus trichopodus* var. *phoxus*	Antisell's Three-pod Milkvetch	PH	Fabaceae
1,2	*Baccharis pilularis*	Coyote Brush	S	Asteraceae
1	*Baccharis salicifolia*	Mulefat	S	Asteraceae
2	*Bromus diandrus**	Ripgut Grass	AG	Poaceae
1,2	*Calystegia purpurata* ssp. *purpurata*	Purple Morning Glory	PV	Convolvulaceae
1	*Carduus pycnocephalus**	Italian Thistle	AH	Asteraceae
1,2	*Ceanothus megacarpus* var. *megacarpus*	Bigpod Ceanothus	S	Rhamnaceae
1,2	*Ceanothus spinosus*	Greenbark Ceanothus	S	Rhamnaceae
1,2	*Centaurea melitensis**	Tocalote	AH	Asteraceae
2	*Cercocarpus betuloides* var. *betuloides*	Birchleaf Mountain Mahogany	S	Rosaceae
1	*Chlorogalum pomeridianum* var. *pomeridianum*	Common Soap Lily	PH	Liliaceae
1	*Circium vulgare**	Bull Thistle	BH	Asteraceae
1	*Claytonia parviflora* ssp. *parviflora*	Small-flowered Miner's Lettuce	AH	Portulacaeae
2	*Conyza canadensis*	Horseweed	AH	Asteraceae
2	*Cryptantha* sp.	a forget-me-not	AH	Boraginaceae
1	*Cucurbita foetidissima*	Calabazilla	PV	Cucurbitaceae
2	*Cuscuta californica* var. *californica*	California Dodder	AV	Cuscutaceae
1	*Datura wrightii*	Jimson Weed	AH	Solanaceae
2	*Delphinium* sp.	larkspur	PH	Ranunculaceae
2	*Encelia californica*	California Encelia	S	Asteraceae
1	*Eremocarpus setigerus*	Dove Weed	AH	Euphorbiaceae
2	*Eriogonum fasciculatum* var. *foliolosum*	Leafy California Buckwheat	S	Polygonaceae
2	*Eriophyllum confertiflorum* var. *confertiflorum*	Golden Yarrow	PH	Asteraceae
1	*Erodium cicutarium**	Redstem Filaree	AH	Geraniaceae
1	*Erodium moschatum**	Whitestem Filaree	AH	Geraniaceae
2	*Geranium molle**	Annual Cranesbill	AH	Geraniaceae
1,2	*Hazardia squarrosa* var. *grindelioides*	Grindel's Sawtooth Goldenbush	S	Asteraceae
1	***Helianthemum scoparium***	Peak Rushrose	PH	Cistaceae
2	*Heteromeles salicifolia* [*H. arbutifolia*]	Toyon	S	Rosaceae
1,2	*Hirschfeldia incana**	Summer Mustard	BH	Brassicaceae
2	*Juncus xiphioides*	Iris-leaved Rush	PH	Juncaceae
2	*Leymus condensatus*	Giant Wildrye	PG	Poaceae
1	*Lotus scoparius* var. *scoparius*	Deerweed	S	Fabaceae
2	*Lupinus succulentus*	Fleshy Lupine	AH	Fabaceae

[1] Scientific nomenclature follows Hickman (1993). * = nonnative species which have become naturalized or persist without cultivation. + = planted or escaped introduced ornamental species. **Bold** = Special-status species (discussed below in the Special-Status Biological Resources section).

[2] Common names follow Abrams and Ferris (1960), DeGarmo (1980), Hickman (1993), and Niehaus and Ripper (1976).

[3] Habit definitions: PG = perennial grass; AG = annual grass; PH = perennial herb; AH = annual herb; PV = perennial vine; F = fungus BH = biennial herb; S = shrub; T = tree.

Site	Scientific Name[1]	Common Name[2]	Habit[3]	Family
1,2	*Malacothamnus fasciculatus* var. *fasciculatus*	Chapparal Bush Mallow	S	Malvaceae
2	*Malacothrix saxatilis* var. *tenuifolia*	Tenuated Cliff Aster	PH	Asteraceae
1,2	*Malosma laurina*	Laurelleaf Sumac	S	Anacardiaceae
1	*Malva parviflora**	Cheeseweed	AH	Malvaceae
1,2	*Marah macrocarpus* var. *macrocarpus*	Large-fruited Man-root	PV	Cucurbitaceae
1,2	*Marrubium vulgare**	White Horehound	S	Lamiaceae
1	*Medicago polymorpha**	Bur-clover	AH	Fabaceae
1	*Nicotiana glauca**	Tree Tobacco	S	Solanaceae
2	*Paeonia californica*	California Peony	PH	Paeoniaceae
2	*Phacelia cicutaria* var. *hubbyi*	Hubby's Caterpillar Phacelia	AH	Hydrophyllaceae
2	*Phacelia cf. davidsonii*	Davidson's Phacelia	AH	Hydrophyllaceae
1	*Piptatherum miliaceum**	Smilo Grass	PG	Poaceae
1	*Platanus racemosa* var. *racemosa*	Western Sycamore	T	Platanaceae
2	*Pseudognaphalium californicum*	Green Everlasting	A/BH	Asteraceae
2	*Pseudognaphalium palustre*	Lowland Cudweed	AH	Asteraceae
1,2	*Quercus agrifolia* var. *agrifolia*	Coast Live Oak	T	Fagaceae
1	*Quercus berberidifolia*	California Scrub Oak	S	Fagaceae
1	*Rumex crispus**	Curly Dock	PH	Polygonaceae
1	*Salvia leucophylla*	Purple Sage	S	Lamiaceae
1,2	*Salvia mellifera*	Black Sage	S	Lamiaceae
1,2	*Sambucus mexicana*	Blue Elderberry	S	Caprifoliaceae
2	*Sanicula crassicaulis* var. *crassicaulis*	Pacific Sanicle	PH	Apiaceae
1	*Schinus molle*+*	Peruvian Pepper Tree	T	Anacardiaceae
1,2	*Silybum marianum**	Milk Thistle	AH	Asteraceae
1	*Solanum douglasii*	Douglas' Nightshade	PH	Solanaceae
1,2	*Solanum xantii* var. *xantii*	Chaparral Nightshade	S	Solanaceae
2	*Toxicodendron diversilobum*	Western Poison Oak	S/PV	Anacardiaceae
1,2	*Verbena lasiostachys* var. *lasiostachys*	Western Verbena	AH	Verbenaceae

The project site vegetation is comprised of three predominant **habitat types**, including *Ceanothus megacarpus* Alliance (Bigpod Ceanothus Chaparral), *Quercus agrifolia* Alliance (Coast Live Oak Woodland), and Ruderal Grassland Alliance.

Ceanothus megacarpus Alliance (Bigpod Ceanothus Chaparral)

Bigpod Ceanothus Chaparral forms tall dense stands that are strongly dominated by *Ceanothus megacarpus* var. *megacarpus*. Bigpod Ceanothus is an evergreen shrub (< 4 meters tall) with gray to red-brown, round, tomentose (becoming gray) twigs. Bigpod Ceanothus occurs on sunny dry slopes and in canyons near the coast, at elevations below 750 meters (Hickman 1993). Bigpod Ceanothus Chaparral appears to be fire-maintained, does not stump sprout, and is very long-lived absent fires; fire scarification results in even-aged stands (Holland 1986).

Sawyer & Keeler-Wolf (1995) describe this chaparral plant community in which *C. megacarpus* is the sole or dominant shrub in the canopy. Emergent trees may be present, but Bigpod Ceanothus typically forms a continuous to intermittent tall canopy, generally consisting of few associate species, growing over a sparse ground layer. Percent coverage by Bigpod Ceanothus must be at least 60% to be categorized in this series. Bigpod

Ceanothus Chaparral occurs on xeric upland slopes, usually fairly near the coast, growing in shallow, rocky, poorly differentiated soils (Holland 1986), and it occurs at elevations between 100 and 750 meters.

- The predominant Bigpod Ceanothus associates forming the plant associations include: Chamise (*Adenostoma fasciculatum*), Birchleaf Mountain Mahogany (*Cercocarpus betuloides* var. *betuloides*), Toyon (*Heteromoles salicifolia* [*H. arbutifolia*]), Giant Wildrye (*Leymus condensatus*), Chaparral Mallow (*Malacothamnus fasciculatus*), and Laurelleaf Sumac (*Malosma laurina*). The important Coastal Sage Scrub species include: California Sagebrush (*Artemisia californica*), Coyote Brush (*Baccharis pilularis*), California Buckwheat (*Eriogonum fasciculatum* var. *foliolosum*), Green Everlasting (*Pseudognaphalium californicum*), sages (*Salvia leucophylla*, *S. mellifera*), Blue Elderberry (*Sambucus mexicana*), and Western Poison Oak (*Toxicodendron diversilobum*).

Several other shrub species were found within the Bigpod Ceanothus canopy onsite including: California Bush Sunflower (*Encelia californica*), Sawtooth Goldenbush (*Hazardia squarrosa*), Toyon, Deerweed (*Lotus scoparius*), Chaparral Bush Mallow, oaks (*Quercus agrifolia* [tree], *Q. berberidifolia* [shrub]), and Chaparral Nightshade (*Solanum xantii* var. *xantii*).

The ground layer is composed of a variety of native, showy-flowered, annual and perennial herbs, including: Antisell Three-pod Milkvetch (*Astragalus trichopodus* var. *phoxus*), Golden Yarrow (*Eriophyllum confertiflorum* var. *confertiflorum*), Green Everlasting, Cliff-aster (*Malacothrix saxatilis*), Hubby's Caterpillar Phacelia (*Phacelia cicutaria* var. *hubbyi*), and Pacific Sanicle (*Sanicula crassicaulis*). Other note-worthy ground layer species include the perennial vines Purple Morning-glory (*Calystegia purpurata* var. *purpurata*) and Calabazilla, (*Cucurbita foetiditissima*). Ruderal species include: White Horehound (*Marrubium vulgare*), Tree Tobacco (*Nicotiana glauca*), and Milk Thistle (*Silybum marianum*).

Quercus agrifolia Alliance (Coast Live Oak Woodland)

Coast Live Oak Woodland is dominated by *Quercus agrifolia* var. *agrifolia*, which is a wide-topped tree. It occurs in valleys and on slopes at riparian woodland fringes, scattered in grassland or Coastal Sage Scrub communities, as an element of Mixed Evergreen Forest, or as a contributor to other oak woodlands.

Sawyer & Keeler-Wolf (1995) describes this plant community as forming a 30-meter tall, continuous, intermittent, or open canopy with occasional or common understory shrubs and an absent or grassy ground layer. This alliance often occurs on very steep slopes and on raised stream banks or terraces. *Quercus agrifolia* Alliance requires sandstone or shale-derived soils, and grows at elevations between sea level and 1,200 meters.

Codominant, or important tree canopy contributors, of *Quercus agrifolia* Alliance are Greenbark Ceanothus (*Ceanothus spinosus*) and Toyon. The dominant understory shrubs include: California Sagebrush, Bigpod Ceanothus, Birchleaf Mountain Mahogany (*Cercocarpus betuloides* var. *betuloides*), and Giant Wildrye.

The Coast Live Oak understory also consists of several other Coastal Sage Scrub species such as Coyote Brush, Leafy California Buckwheat, Toyon, Deerweed, Chaparral Bush Mallow, Laurelleaf Sumac, Purple Sage (*Salvia leucophylla*), Blue Elderberry (*Sambucus mexicana*), and Western Poison Oak.

Ruderal Grassland Alliance

Ruderal Grassland is a plant community that is typically in early successional stages as a result of a severe disturbance by natural or human causes, or because the land is subject to recurrent disturbance. This plant community is dominated by annual and perennial, non-native, pioneering, herbaceous plants that readily colonize

disturbed ground. The ability of exotic species to invade disturbed areas arises from their relationship to Old World ancestors that have co-existed with humans for millennia, and thus are more adapted to exploit disturbed land. Ruderal communities may provide a certain degree of erosion control for recently graded areas, but such communities are also a threat to biodiversity because they continually distribute non-native propagules into native vegetation. These exotic species colonize natural disturbances (burns) and compete with the more desirable natives; however, if Ruderal Grassland is left undisturbed it generally undergoes succession towards more stable, and less weedy, plant communities such as coastal sage or riparian scrub. (Zedler et al. 1997.)

Plant associations include plants that were, at one time, dominant native species, such as California Sagebrush, Coyote Brush, Cliff-aster, and Purple Sage.

WILDLIFE

Wildlife species that were observed or detected onsite include: California Towhee (*Pipilo crissalis*), Red-tailed Hawk (*Buteo jamaicensis*), Western Scrub-jay (*Aphelocoma californica*), California Quail (*Callipepla californica*), Anna's Hummingbird, (*Calypte anna*), Coyote, (*Canis latrans*) (scat and prints), Mule Deer, (*Odocoileus hemionus*) (prints), Pacific or California Treefrog (*Hyla regilla* or *H. cadaverina*, resp.) (vocalization), and Western Fence Lizard (*Sceloporus occidentalis*).

Numerous other wildlife species are expected to occur onsite; however, the actual species using the parcels can only be determine with faunalistic field surveys conducted during the spring and summer months when they are either foraging, nesting onsite more actively than in the winter. Seasonal field surveys are recommended.

IV. BIOLOGICAL RESOURCES:	**PROJECT IMPACT DEGREE OF EFFECT[4]**				**CUMULATIVE IMPACT DEGREE OF EFFECT**			
What level of impact will the proposal have on:	**N**	**LS**	**PS-M**	**PS**	**N**	**LS**	**PS-M**	**PS**
A. Endangered, Threatened, or Rare Species				**X**				**X**
B. Wetland Habitat			**X**				**X**	
C. Coastal Habitat	**X**				**X**			
D. Migration Corridors				**X**				**X**
E. Locally Important Species/Communities				**X**				**X**
Will the proposal:								
a) 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?				**X**				**X**
b) 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?			**X**				**X**	
c) Have a substantial adverse effect on federally protected wetland 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?			**X**				**X**	
d) 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?		**X**				**X**		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**				**X**

[4] N = No Impact; LS = Less Than Significant; PS-M = Potentially Significant Impact Unless Mitigation Incorporated; PS = Potentially Significant Impact. Blank questions represent undeterminable impacts due to lack of information or inadequate survey data.

IV. BIOLOGICAL RESOURCES:	**PROJECT IMPACT DEGREE OF EFFECT[4]**				**CUMULATIVE IMPACT DEGREE OF EFFECT**			
What level of impact will the proposal have on:	**N**	**LS**	**PS-M**	**PS**	**N**	**LS**	**PS-M**	**PS**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	**X**				**X**			

ADDITIONAL COMMENTS OR EXPLANATIONS:

DMEC referenced California Native Plant Society's *Inventory of Rare and Endangered Plants of California* (CNPS 2001) and the *Checklist of Ventura County Rare Plants* (Magney 2005) to account for all special-status plant species with potential to occur in the vicinity of the proposed project site (Magney 2001). DMEC also conducted a search of the CDFG's CNDDB RareFind 3 (Version 3.0.5) (CDFG 2005) for the Matilija, California Quadrangle (USGS 7.5-minute Series Topographic Map), and all surrounding quads (Lion Canyon, Ojai, Old Man Mountain, Pitas Point, Saticoy, Ventura, Wheeler Springs, and White Ledge Peak), to account for all special-status plant and wildlife species and habitats with potential to occur onsite that are reported within the region. At least two genera of plants observed onsite (*Cryptantha* and *Delphinium*) have species within the region that are considered at least locally rare; however, they could not be identified during the winter, and require identification when in bloom (spring).

The project area is inhabited by at least one plant taxon considered locally rare in Ventura County: *Helianthemum scoparium*. *Helianthemum scoparium* is considered uncommon in Ventura County by the California Native Plant Society (Magney 2005), occurring at six to ten locations (populations) in Ventura County, and at least one of these other populations is proposed for development (DMEC 2005).

The CNDDB-tracked special-status plant species reported in the Matilija Quad, and in the region of the project site, include: *Astragalus didymocarpus* var. *milesianus* (Miles's Milkvetch), *Atriplex serenana* var. *davidsonii*, (Davidson's Saltscale), *Calochortus weedii* var. *vestus* (Late-flowered Mariposa Lily), *Fritillaria ojaiensis* (Ojai Fritillary), *Horkelia cuneata* ssp. *puberula* (Mesa Horkelia), *Nolina cismontana* (Chaparral Nolina), *Sagittaria sanfordii* (Sanford's Arrowhead), and *Sidalcea meomexicana* (Saltspring Checkerbloom). Although none of these CNDDB-tracked special-status plant species were observed onsite, impacts to these reported taxa would be considered a significant impact. Since suitable habitat is not present onsite for all of these species, DMEC does not expect the proposed project to result in any impacts to most of these plant species, in part because the site has already been predominantly cleared of most vegetation. Regardless, the timing of the field survey in the winter did not allow for an adequate floristic survey since many species are dormant during the winter.

A small stream channel exists on the smaller parcel. Any crossings of it will require permits from California Department of Fish and Game and U.S. Army Corps of Engineers. Furthermore, discretionary development occurring within 100 feet of riparian wetlands is generally prohibited under County General Plan policy. No specific grading plans have been submitted as part of the application to determine the distance of any proposed development would occur within 100 feet of the stream onsite.

The CNDDB search resulted in six **sensitive habitat types** with potential to occur onsite, including:

- California Walnut Woodland

- Southern California Coastal Lagoon
- Southern California Steelhead Stream
- Southern Coast Live Oak Riparian Forest
- Southern Riparian Scrub
- Southern Sycamore Alder Riparian Woodland

However, none of these sensitive habitat types were observed immediately onsite.

Several **special-status wildlife** species are known or expected to occur in the region of the project site (Magney 2001). Nineteen (19) special-status wildlife species (including invertebrates) were reported in the area by the CNDDB (refer to the CNDDB results table provided). Only two (of five) wildlife species are tracked specifically by CNDDB within the Matilija Quadrangle that have habitat requirements similar to the habitats onsite, and those species are San Diego Horned Lizard (*Phrynosoma coronatum blainvillei*) and Dulzura Pocket Mouse (*Chaetodipus californicus femoralis*). Habitat exists onsite for many of the other CNDDB-tracked special-status species for the surrounding quads. DMEC expects that some of these sensitive species may inhabit or frequent the project site. Detailed, focused surveys for those species onsite are needed before an impact assessment can be completed, which may include trapping.

The Simmons project will result in direct and indirect impacts to biological resources, some of which are significant. The project may also result in permanent loss of individuals of rare and common plants, and a loss of habitat for common and sensitive wildlife species. Loss of individual rare plants is considered a significant and unavoidable impact, even after the project has been redesigned to minimize impacts and meet project objectives. However, these impacts can likely by mitigated onsite to a less-than-significant level. The proposed project will reduce occupied habitat onsite for San Diego Horned Lizard and Dulzura Pocket Mouse, resulting in potentially significant habitat impacts to these species.

Depending on how the two parcels are developed, wildlife movement could be adversely affected if significant areas of natural habitat are converted to other uses, or physical and perceived barriers are erected onsite that would inhibit or prohibit wildlife movement.

Recommendations:

Mr. Simmons is requesting a lot line adjustment to create two buildable parcels, one 80.47 acres, and one 87.14 acres, which is expected to result in development on each of the new parcels. No information on the specific development was provided to DMEC as to exactly where and how much of each parcel would be developed.

Given that DMEC does not know exactly where subsequent development may occur in the future, no focused surveys could be conducted within any particular future footprints. Furthermore, DMEC had insufficient time to conduct focused surveys of all areas of the property during the January survey, and surveys were conducted outside of the growing season to detect all resources onsite. The potential for the development of the property creates the potential for significant impacts to result to some of the biological resources reported in this study. The following are recommendations to avoid future impacts to sensitive resources onsite.

The presence of a Ventura County Locally Rare plant species (as designated by the California Native Plant Society [Magney 2005]) in Parcel 1, *Helianthemum scoparium*, onsite represents a potentially significant impact if the plant population is destroyed. Additional locally rare plant species may occur onsite that could not be identified at this time, requiring seasonal field surveys in the spring. Subsequent development creates the potential to impact this locally important species population; however, the loss of individual plants in itself would not likely

result in a significant adverse impact. Since this plant is a perennial species, incidental disturbance to several individual plants may likely result in a loss of the population onsite. The population onsite likely extends beyond what DMEC could identify as the potential building pads, providing a mechanism for recolonization of disturbed areas. Detailed surveys of the entire parcels and mapping would be required to fully determine the extent and significance of impacting this, and other potentially present special-status plant species.

DMEC recommends spring (seasonal) surveys to be conducted onsite within all areas proposed for development subsequent to this current request for the parcel map waiver and large lot subdivision. Any special-status species observed during focused seasonal surveys should be flagged and mapped onsite. Locations of such sensitive resources (including sensitive plants, wildlife and habitats) should be considered and should aid in the placement of each future footprint to avoid impacts to special-status resources to the maximum extent possible onsite.

The potential for San Diego Horned Lizard and Dulzura Pocket Mouse to occur onsite is high, due to the presence of their required habitat onsite. Therefore, focused surveys are recommended prior to permit issuance and any subsequent construction activities.

The potential for oak woodland conversion resulting from subsequent development of the property exists onsite. Some functional *Quercus agrifolia* Alliance (Coast Live Oak Woodland) habitat exist onsite, and any impacts to this habitat is subject to all conditions and requirements set forth by the Oak Woodlands Conservation Act. This act requires projects of a certain size and for which a significant impact to oak woodlands would occur, to adopt one or more of the following mitigation alternatives, which shall be required to mitigate the significant effects of the conversion of oak woodlands. If unavoidable impacts to Coast Live Oak Woodland results from subsequent development, mitigation will include, but is not limited to, the following:

- Conserve oak woodlands through the use of conservation easements.
- Plant appropriate number of trees, including maintaining plantings and replacing dead/diseased trees.
- Maintain trees seven (7) years after the trees are planted.
- Mitigation shall not fulfill more than one-half of the mitigation requirement for the project.
- The requirements may be used to restore former oak woodlands.
- Contribute funds to the Oak Woodlands Conservation Fund, for the purpose of purchasing oak woodlands conservation easements.
- Other mitigation measures developed by the County.

Wildlife movement onsite should be analyzed to determine what part(s) of the parcels are routinely used by terrestrial wildlife for movement from one area to another. Any such movement travel routes and corridors that are found onsite should be assessed for compatibility with the proposed development to determine whether a significant impact will result.

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D. MANDATORY FINDINGS OF SIGNIFICANCE Based on the information contained with Section B6:	**Yes/Maybe**	**No**
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California's history or prehistory?	**X**	
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)		**X**
3. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but that total of those impacts on the environment is significant.)	**X**	
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		**X**

E. DETERMINATION OF ENVIRONMENTAL DOCUMENT:

On the basis of this initial evaluation:

[ ]	I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
[ ]	I find that although the proposed project could have a significant effect on the environmental, there would not be a significant effect in this case because the mitigation measure(s) described in section C of the Initial Study will be applied to the project, A MITIGATED NEGATIVE DECLARATION should be prepared.
[**X**]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environmental, and an ENVIRONMENTAL IMPACT REPORT is required.
[ ]	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environmental, but at least one effect 1) has been adequately analyzed in and earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
[ ]	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Biological Resources Initial Study Preparer

19 January 2006
Date