Appendix C. Biological Resources Technical Report

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Biological Resources Technical Report

Coastal Resilience Master Plan,
Phase 1: Prioritizing Nature-Based Solution Pilots

November 2024

Prepared for:

The City of SAN DIEGO

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Acronyms and Abbreviations

amsl	above mean sea level
ASMD	Area-Specific Management Directive
BMP	best management practice
CCA	California Coastal Act
CCC	California Coastal Commission
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CFGC	California Fish and Game Code
City	City of San Diego
CNPS	California Native Plant Society
County	County of San Diego
COZ	Coastal Overlay Zone
CRMP	Coastal Resilience Master Plan
CRMP Phase 1	Coastal Resilience Master Plan, Phase 1: Prioritizing Nature-Based Solution Pilots
CRPR	California Rare Plant Rank
CWA	Clean Water Act
ESL	Environmentally Sensitive Lands
FESA	federal Endangered Species Act
Harris	Harris & Associates
HU	hydrologic unit
LDC	Land Development Code
LUAGs	Land Use Adjacency Guidelines
MBTA	Migratory Bird Treaty Act
MHPA	Multi-Habitat Planning Area
MM	Mitigation Measure
MMPA	Marine Mammal Protection Act
MSCP	Multiple Species Conservation Program
NPDES	National Pollutant Discharge Elimination System
PEIR	Program Environmental Impact Report
Porter-Cologne	Porter-Cologne Water Quality Control Act
PRC	California Public Resources Code
RWQCB	Regional Water Quality Control Board
SAP	City of San Diego Multiple Species Conservation Program Subarea Plan
SDBG	Land Development Code—Biology Guidelines
SDNHM	San Diego Natural History Museum
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USFWS	U.S. Fish and Wildlife Service
VPHCP	Vernal Pool Habitat Conservation Plan
WL	Watch List

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Executive Summary

Harris & Associates (Harris) has prepared this Biological Resources Technical Report in support of the Program Environmental Impact Report for the proposed Coastal Resilience Master Plan, Phase 1: Prioritizing Nature-Based Solution Pilots (CRMP Phase 1) in the City of San Diego (City), California. This report is intended to provide the results of biological reconnaissance surveys and provide a program-level analysis of the potential impacts that could occur to biological resources as a result of project implementation. The survey area (which includes the six project sites and a 100-foot survey buffer around each site) consists of approximately 127.52 acres of land and approximately 14.12 acres of open water (subtidal ocean, intertidal ocean, and estuarine) for a total of 141.64 acres. The survey area includes the following six coastal locations throughout the City of San Diego: La Jolla Shores, Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach Dog Beach, Ocean Beach, and Sunset Cliffs. The survey area is entirely in the Coastal Overlay Zone. Portions of the Ocean Beach – Dog Beach project site and the survey buffer of the Sunset Cliffs project site are in the Multi-Habitat Planning Area of the City's Multiple Species Conservation Program Subarea Plan. The proposed CRMP Phase 1 aims to identify specific resilience and conservation needs along the coastline and develop a portfolio of nature-based solutions to promote resilience, protect critical coastal habitats, support coastal access, and protect the City against the risk of climate change, which is in line with the Climate Resilient SD Plan (Policy TNE-3). The proposed CRMP Phase 1 would prioritize nature-based solutions that achieve multiple benefits, such as habitat and wildlife protection, water quality improvements, flood storage, resilience from potential upstream impacts, recreational opportunities, and increased coastal access for Communities of Concern.[1]

Analysis of biological resources was carried out through a review of existing maps, literature, and resource databases, including Calflora Database, CNPS Inventory of Rare and Endangered Plants Database, California Department of Fish and Wildlife's (CDFW's) Biogeographic Information and Observation System Database, City of San Diego Final Multiple Species Conservation Program Subarea Plan, SanGIS, U.S. Department of Agriculture's Web Soil Survey of San Diego County Area, California, U.S. Fish and Wildlife Service's (USFWS's) National Wetland Inventory Wetland Mapper, and U.S. Geological Survey's National Hydrologic Dataset, among other resources (see Section 8, References). In addition, sensitive plant and wildlife species occurrences documented within and around Smiley Lagoon by City biologists during surveys conducted between 2006 and 2023 were reviewed and included in the analysis as applicable. Analysis of biological resources also included data collected during field surveys conducted by Harris. The field surveys conducted by Harris in April and August 2023 focused on mapping vegetation communities and land cover types, documenting observed plant and wildlife species, and evaluating the

[1] The City's term for communities with low to moderate access to opportunity based on the City's Climate Equity Index. The Climate Equity Index was developed in 2019, and revised in 2021, to measure the level of access to opportunity residents have within a census tract and assess the degree of potential impact from climate change to these areas.

potential for occurrence of sensitive plant and wildlife species. No focused or protocol surveys, in-water surveys, or formal aquatic resources delineations were conducted during the 2023 surveys.

Eleven vegetation communities and land cover types were identified in the survey area. Native vegetation and wetland communities in the survey area are subtidal ocean, intertidal ocean, estuarine, southern coastal salt marsh, beach, concrete channel, sandstone cliff, disturbed southern foredunes, and disturbed Diegan coastal sage scrub. The survey area also includes non-native woodland. Two land cover types, disturbed habitat and developed land, were also observed in the survey area.

No formal aquatic resources delineation was conducted during the 2023 surveys. However, an informal review of aquatic resources by an aquatic resource specialist during the surveys revealed a total of 64.50 acres of potentially jurisdictional wetlands and non-wetland waters in the survey area, which may potentially be under the jurisdiction of the following agencies: the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Coastal Commission, California Department of Fish and Wildlife, and/or the City. A formal delineation would be required to better understand the presence of potentially jurisdictional aquatic resources.

Three sensitive plant species, California box-thorn (*Lycium californicum*), Nuttall's acmispon (*Acmispon prostratus*), and southwestern spiny rush (*Juncus acutus*), were documented in the survey area (Ocean Beach – Dog Beach and Sunset Cliffs project sites) during the 2023 biological surveys. Based on the literature and database review, as well as City-documented sensitive species data collected between 2006 and 2023, an additional 11 species were determined to have a moderate or high potential to occur in the survey area but were not observed during the biological resources surveys, including Aphanisma (*Aphanisma blitoides*), coast wallflower (*Erysimum ammophilum*), coast woolly-heads (*Nemacaulis denudata* var. *denudata*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), estuary seablite (*Suaeda esteroa*), Red sand verbena (*Abronia maritima*), San Diego barrel cactus (*Ferocactus viridescens)*, San Diego marsh-elder (*Iva hayesiana*), south coast saltbush (*Atriplex pacifica*), and salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*).

Seven sensitive wildlife species were observed in the survey area during the Harris biological surveys: Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), California brown pelican (*Pelecanus occidentalis californicus*), California sea lion (*Zalophus californianus*), Caspian tern (*Hydroprogne caspia*), double-crested cormorant (*Phalacrocorax auritus*), long-billed curlew (*Numenius americanus*), and monarch butterfly (*Danaus plexippus*). Of the seven sensitive wildlife species observed in the survey area, Belding's savannah sparrow, California brown pelican, and long-billed curlew are covered under the San Diego Multiple Species Conservation Program Subarea Plan (City of San Diego 1997). Based on the literature and database review, as well as City-documented sensitive species data collected between 2006 and 2023, an additional 15 sensitive wildlife species

were determined to have a moderate or high potential to occur in the survey area but were not observed during the biological resources surveys: American peregrine falcon (*Falco peregrinus anatum*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi)*, black tern (*Chlidonias niger*), California least tern (*Sternula antillarum browni*), Cooper's hawk (*Accipiter cooperii*), Costa's hummingbird (*Calypte costae*), elegant tern (*Thalasseus elegans*), Light-footed Ridgway's rail (*Rallus obsoletus levipes*), Mexican long-tongued bat (*Choeronycteris mexicana*) northern harrier (*Circus hudsonius*), northwestern San Diego pocket mouse (*Chaetodipus fallax)*, osprey (*Pandion haliaetus*), reddish egret (*Egretta rufescens*), southern California legless lizard (*Anniella stebbinsi)*, and wandering skipper (*Panoquina errans*). Of these species, American peregrine falcon, Belding's orange-throated whiptail, California least tern, Cooper's hawk, elegant tern, light-footed Ridgway's rail, northern harrier, reddish egret, and wandering skipper are covered by the MSCP SAP. The survey area was determined to have a high potential to support nesting birds, protected under California Fish and Game Code and Migratory Bird Treaty Act, as well as sensitive roosting bats.

The proposed CRMP Phase 1 is required to be in compliance with all federal, state, and local regulations applicable to biological resources, including jurisdictional aquatic resources, as a condition of future project-level approval. The proposed CRMP Phase 1 could result in potentially significant direct and indirect impacts to sensitive plant and wildlife species, including sensitive nesting birds and roosting bats, and could potentially cause the introduction of non-native and/or invasive species. The proposed CRMP Phase 1 could result in potential impacts to nine sensitive vegetation communities, including wetlands, regulated by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Coastal Commission, California Department of Fish and Wildlife, and the City. Mitigation would include the following measures: focused sensitive plant and wildlife surveys, monitoring by a qualified biologist, implementation of required mitigation ratios assigned to upland and wetland habitats for compensatory mitigation pursuant to the City's Biology Guidelines, revegetation and restoration of native habitats through preparation of appropriate revegetation and/or restoration plans, and obtainment of all applicable resource agency permitting. All potentially significant impacts would be reduced to below a level of significance with implementation of proposed mitigation measures. Adherence with federal, state, and local regulations and implementation of mitigation measures would ensure that impacts as a result of the proposed CRMP Phase 1 are mitigated to below a level of significance pursuant to the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds. Further, the proposed CRMP Phase I has been evaluated for consistency with the Multiple Species Conservation Program Subarea Plan's, General Planning Policies and Design Guidelines, General Management Directives, Species Specific Area-Specific Management Directives, and Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines, as well as City's Environmentally Sensitive Lands Regulations and the City's General Plan Conservation and Recreation Elements. The proposed CRMP Phase I would not result in cumulatively considerable impacts to biological resources.

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Section 1 Introduction

Harris & Associates (Harris) was contracted by the lead agency to conduct desktop literature reviews and reconnaissance-level biological surveys in support of the Program Environmental Impact Report (PEIR) for the proposed Coastal Resilience Master Plan, Phase 1: Prioritizing Nature-Based Solution Pilots (CRMP Phase 1) in the City of San Diego (City), California.

1.1 Purpose of the Report

The purpose of this Biological Resources Technical Report is to document the biological resources present in the proposed CRMP Phase 1 area; identify potential impacts to special-status biological resources associated with implementation of the project; and document avoidance, minimization, and/or mitigation measures consistent with federal, state, and local rules and regulations, including the City's current Municipal Code, Land Development Manual Biology Guidelines (Biology Guidelines or SDBG) (City of San Diego 2018). This report includes an introduction; a discussion of environmental setting, including a project description; a summary of the federal, state, and local regulations applicable to biological resources; methods for the literature review and surveys conducted for the project and survey limitations; results reflecting data collected during surveys conducted in the survey area, including a description and analysis of existing biological and sensitive biological resources; and an analysis of potential project impacts, including cumulative impacts and mitigation required to reduce potential impacts from project implementation to below a level of significance.

The term "biological resources" refers to plant species, wildlife species, vegetation communities, and aquatic resources in and adjacent to the CRMP Phase 1 area. For the purposes of this report, sensitive biological resources are those defined as follows: (1) species designated as endangered, threatened, rare, protected, sensitive, or species of special concern according to the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Native Plant Society (CNPS), or applicable regional plans, policies, or regulations established due to limited distribution, limited numbers, or significant population declines associated with natural or human-made causes; (2) species and habitat types recognized by local and regional resource agencies as special status; (3) habitats or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; (4) wildlife corridors and habitat linkages; or (5) biological resources that may or may not be considered special status but are regulated under local, state, and/or federal laws.

This report discusses potential impacts, avoidance areas, and mitigation measures (MMs) applicable to biological resources associated with implementation of the proposed CRMP Phase 1 in accordance with the federal Endangered Species Act (FESA); California Endangered Species Act (CFGC 2050 et seq.); California Environmental Quality Act (CEQA); Clean Water Act (CWA); Porter-Cologne Water Quality Control Act (Porter-Cologne); Migratory Bird Treaty Act

(MBTA); Sections 1600, 1602, 3511, and 4700 of the California Fish and Game Code (CFGC); California Coastal Act (CCA); and the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) (City of San Diego 1997), the City's Land Development Code (LDC), the City's Environmentally Sensitive Lands (ESL) regulations, and the City's Biology Guidelines.

Section 2 Environmental Setting

The following is a description of the existing conditions in the proposed CRMP Phase 1 area.

2.1 Project Location

The proposed CRMP Phase 1 area spans the coastal jurisdictional boundaries of the City in six coastal locations. Its six project sites, together with a 100-foot survey buffer around each location, are herein referred to collectively as the "survey area" and individually by their site name: La Jolla Shores, Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs (Appendix A, Figures; Figure 1, Regional Location; Figure 2, Project Sites – Index; and Figures 2a through 2f). It should be noted that the project site for the Mission Beach project was extended to include the Perched Beach Design Option (refer to Figure 3-9 of the PEIR) following completion of the reconnaissance surveys. Therefore, while the Mission Beach survey buffer encompasses the entire Mission Beach project site, a portion of the survey buffer does not extend 100 feet beyond the project site.

The survey area consists of approximately 127.52 acres of land and approximately 14.12 acres of open water (subtidal ocean, intertidal ocean, and estuarine) for a total of 141.64 acres. The survey area is in the La Jolla and Point Loma U.S. Geological Survey 7.5-minute quadrangles maps. According to the City's General Plan Land Use Map (Figure LU-2 in City of San Diego 2020), the majority of the survey area's western and central portions are designated as Park, Open Space, and Recreation, and the eastern edges are designated as Residential.

2.2 Project Description

The City proposes a CRMP that would identify specific resilience and conservation needs along the coastline and develop a portfolio of nature-based solutions to promote resilience, protect critical coastal habitats, and support coastal access. The CRMP engaged the public; analyzed 11 sites based on feasibility, risk, and benefits; developed nature-based solutions for six of the most feasible locations; and selected a pilot project, as described further below.

The CRMP evaluated 11 locations for nature-based solutions at a conceptual level and narrowed the scope to six locations most appropriate for nature-based solutions. The six locations are analyzed in greater detail in the CRMP and PEIR for suitability of nature-based solutions with up to three additional concepts for further project development. One location (the pilot project) is analyzed at 15 percent design level. The CRMP evaluates nature-based solutions, including both green and natural infrastructure. Green infrastructure encompasses a wide range of built or engineered solutions modeled after nature, while natural solutions often refer to restoration activities. Both support purposes such as stormwater management, flood mitigation, urban heat island reduction, and climate adaptation. Nature-based solutions that achieve multiple benefits,

such as habitat and wildlife protection, water quality improvements, flood storage, resilience from potential upstream impacts, recreational opportunities, and increased coastal access for Communities of Concern, would be prioritized. The City would engage the public and stakeholders throughout the project to develop nature-based solutions.

The CRMP Phase 1 analyzes six priority sites (the Pilot Project and five other project sites) for suitability of nature-based and gray infrastructure solutions. Two to three nature-based solution concepts were considered for each of the six priority sites in the CRMP. The design concepts determined to be the most feasible and successful for each of the project sites are discussed below.

2.2.1 Pilot Project: Ocean Beach – Dog Beach

The Pilot Project at the Ocean Beach – Dog Beach project site would include a new multi-use path for cyclists and pedestrians fronted by elevated sand dunes along the beach at the Ocean Beach – Dog Beach project site. The multi-use path and sand dunes would be located along the landward edge of the beach, adjacent to the existing parking lot. The sand dunes, which are inspired by the City's existing winter berm program, would provide flood protection to the coastal park infrastructure and community of Ocean Beach by adding elevation to the back of the beach and by providing a reservoir of sand to the beach that can be utilized during erosive conditions. The proposed sand dunes would make this annual feature a permanent fixture at the project site and would be designed to provide protection from existing and projected flooding impacts associated with sea level rise. The proposed multi-use path and sand dunes would include pedestrian and emergency access points along the project site and maintain existing parking on site (refer to Figure 3-3 of the PEIR).

In addition to the proposed multi-use path and sand dunes, the existing sand dunes north of the parking lot (adjacent to the north and south of the San Diego River Bikeway) would be restored with native vegetation. Two optional components of the Pilot Project include restroom relocation and an express shuttle stop at the Ocean Beach – Dog Beach project site (refer to Figure 3-3 of the PEIR).

The Pilot Project is expected to be constructed with conventional earthwork equipment (e.g., loaders, dozers, tracked excavators) and during the dry season. Imported material (via dump truck) would be minimal and limited to decomposed granite, aggregate base, and concrete for the proposed multi-use path. Sand for the proposed sand dune would be derived from local marine sources, similar to the City's existing winter berm program, which uses sand from the adjacent beach intertidal zone or the San Diego River flood shoal.

Refer to Section 3.4.3, Pilot Project: Ocean Beach – Dog Beach, of the PEIR for a complete description of the proposed Pilot Project at the Ocean Beach – Dog Beach project site.

2.2.2 La Jolla Shores

The La Jolla Shores project includes two design options. The Amphitheater Design Option would construct two earthen dikes along the western edges of the grassy recreational areas at La Jolla Shores and Kellogg Parks on either side of the existing parking lot. Along the western edge of the parking lot, a terraced seatwall would be constructed to provide a viewing and seating area while also providing flood protection (refer to Figure 3-5 of the PEIR). The Reconfigured Park Design Option would reconfigure the grassy recreational areas and parking lot to align the parking lot further inland and away from coastal flood hazards. This option would realign the grassy recreational areas to provide one continuous waterfront park that could include a long earthen dike along the western edge of the park (refer to Figure 3-6 of the PEIR). The La Jolla Shores project is expected to be constructed with conventional earthwork equipment (e.g., loaders, dozers, tracked excavators). Imported material would be necessary to construct the proposed earthen dike(s) or waterfront park and reconfigured parking lot.

Refer to Section 3.4.4.1, La Jolla Shores, of the PEIR for a complete description of the proposed La Jolla Shores project.

2.2.3 Pacific Beach – Tourmaline Surf Park

The Pacific Beach – Tourmaline Surf Park project would convert the existing shoreline protection feature into a hybrid nature-based solution. The existing riprap would be buried to provide a core layer and topped with a mix of cobble and sand. The proposed sand and cobble dune (with a rock core) would be vegetated with native species, which would provide ecological benefits through introduction of rare plant species and habitat for various avian species. In addition, the existing vegetated median between the restroom and the access ramp would be restored with native vegetation (refer to Figure 3-7 of the PEIR). The proposed sand dune would provide protection for the existing access ramp, restroom, and parking lot from existing and projected flooding impacts associated with sea level rise as well as provide a reservoir of sand and cobble to the beach that can be utilized during erosive conditions. Overall, this proposed vegetated sand dune would allow for continued shoreline protection and use of the access ramp while improving the resilience of the feature, enhancing habitat opportunities, increasing the aesthetics of the site, maintaining existing parking on site, and preserving coastal access.

In addition to the proposed sand dune, the Pacific Beach – Tourmaline Surf Park project would include restoration of the existing vegetated median between the restrooms and the access ramp and an optional pedestrian access component. Optional components of the project would include covering or undergrounding the existing drainage culvert along the north edge of the parking lot to provide a pedestrian walkway and the addition of an underground vault for water quality treatment.

The Pacific Beach – Tourmaline Surf Park project is expected to be constructed with conventional earthwork equipment (e.g., loaders, dozers, tracked excavators) and constructed during the dry

season. It is assumed that no imported material would be necessary. Sand and cobble for the proposed sand dune would be derived from local marine sources, similar to the City's existing winter berm program, which uses sand from the adjacent beach intertidal zone. No rock is anticipated to be imported. Existing riprap would be reused on site.

Refer to Section 3.4.4.2, Pacific Beach – Tourmaline Surf Park, of the PEIR for a complete description of the proposed Pacific Beach – Tourmaline Surf Park project.

2.2.4 Mission Beach

The Mission Beach project also includes two different design options for coastal flood protection at the Mission Beach project site. The Dune Design Option would include construction of an elevated sand dune that would run north–south along the back of the beach from Ventura Place to San Fernando Place (refer to Figure 3-8 of the PEIR). The Perched Beach Design Option would convert a portion of the grassy recreational space at Mission Beach Park to a perched sandy beach area by realigning a 350-foot section of the existing seawall and Ocean Front Walk inland (refer to Figure 3-9 of the PEIR). This concept could be implemented in conjunction with a dune feature stretching north-south along the project site, similar to the Dune Design Option. The proposed sand dunes would be vegetated with native species, which would provide ecological benefits. The sand dunes, which are inspired by the City's existing winter berm program, and potential perched beach would provide flood protection to the community of Mission Beach by adding elevation to the back of the beach and by providing a reservoir of sand to the beach that can be utilized during erosive conditions. The proposed sand dunes would make the annual winter berm feature a permanent fixture at the project site and would be designed to provide protection from existing and projected flooding impacts associated with sea level rise. Appropriate openings and passageways would be designed into the dune structure to ensure public access to the beach, limit flood pathways, and integrate with the existing structural protection of the seawall breaks.

The Mission Beach project is expected to be constructed with conventional earthwork equipment (e.g., loaders, dozers, tracked excavators) and during the dry season. It is assumed that no imported material would be necessary. Sand for the proposed sand dune and potential perched beach would be derived from local marine sources, similar to the City's existing winter berm program, which uses sand from the adjacent beach intertidal zone.

Refer to Section 3.4.4.3, Mission Beach, of the PEIR for a complete description of the proposed Mission Beach project.

2.2.5 Ocean Beach – Pier

The proposed Ocean Beach – Pier project would construct a multi-use path for cyclists and pedestrians fronted by an elevated vegetated sand dune (refer to Figure 3-10 of the PEIR), as described for the Pilot Project at the Ocean Beach – Dog Beach project site. The dunes and path

would be located along the landward edge of the beach and would connect to the proposed improvements at the Ocean Beach – Dog Beach project site. As such, the multi-use path for both the Pilot Project and the Ocean Beach – Pier project would connect the existing western terminus of the San Diego River Bikeway to the Ocean Beach Pier.

The sand dunes, which are inspired by the City's existing winter berm program, would provide flood protection to the coastal park infrastructure and community of Ocean Beach by adding elevation to the back of the beach and by providing a reservoir of sand to the beach that can be utilized during erosive conditions. The proposed sand dunes would make this annual feature a permanent fixture at the project site and would be designed to provide protection from existing and projected flooding impacts associated with sea level rise. Appropriate openings and pathways would be designed into the multi-use path and dune structure to ensure emergency vehicles are not hindered and appropriate public access to the beach is provided. The project would maintain existing parking on site.

The Ocean Beach – Pier project is expected to be constructed with conventional earthwork equipment (e.g., loaders, dozers, tracked excavators) and constructed during the dry season. Imported material (via dump truck) would be minimal and limited to DG, aggregate base, and concrete for the proposed multi-use path. Sand for the proposed sand dune would be derived from local marine sources, similar to the City's existing winter berm program, which uses sand from the adjacent beach intertidal zone or the San Diego River flood shoal. No rock is anticipated to be imported. Existing riprap rock would be reused on site.

Refer to Section 3.4.4.4, Ocean Beach – Pier, of the PEIR for a complete description of the proposed Ocean Beach – Pier project.

2.2.6 Sunset Cliffs

The Sunset Cliffs project would implement a road reconfiguration on Sunset Cliffs Boulevard between Guizot Street and Ladera Street, which would convert the roadway into a one-lane, one-way, southbound vehicular travel lane with a separated multi-use path (refer to Figure 3-11 of the PEIR). The proposed Sunset Cliffs project would be implemented through temporary pilot (trial) phases to monitor the project and incorporate lessons learned back into the project design. As such, the road reconfiguration and separated multi-use path would be initially simulated through cones, signage, and other temporary traffic calming devices (e.g., water filled jersey barriers) that are easily moved and modified. The road reconfiguration could be implemented on a single- or multiple-weekday or weekend basis coupled with substantial public outreach and engagement to better inform the design of a more permanent solution. Once an optimized design approach is established following multiple trials, this southern portion of the roadway would be permanently reconfigured to align vehicle travel outside of the cliff erosion zone.

Additional project elements would include habitat enhancement through removal of invasive species and installation of native plants along the Sunset Cliffs trail. Trail enhancement, interpretative signage, and drainage improvements would also be implemented along the Sunset Cliffs project site where feasible and appropriate. The Sunset Cliffs project also includes optional components to realign parking further inland, enhance trails, improve inland drainage, install native plants, and implement erosion control measures along the northern portion of the site. Given the narrow cliff edges and limited amount of recreational space consisting of informal trails, the major focus for the Sunset Cliffs project is to enhance the existing resources without compromising the structural integrity of the cliff or current infrastructure.

Once the roadway configuration is finalized through the pilot program, the Sunset Cliffs project is expected to be constructed with conventional earthwork and roadway construction equipment (e.g., loaders, dozers, tracked excavators).

Refer to Section 3.4.4.5, Sunset Cliffs, of the PEIR for a complete description of the proposed Sunset Cliffs project.

2.3 Land Use

2.3.1 Existing Land Uses

The existing land uses and associated acreages in the survey area are described in Table 1, Existing Land Use Acreages, and are shown on Figure 2 and Figures 2a through 2f.

Table 1. Existing Land Use Acreages

Land Use	Project Sites (Acres)	Survey Area (Acres)
Urban/Residential Land (Including Roads)[1]	22.56	64.15
Vegetated Land[2]	1.91	3.98
Shoreline[3]	33.92	59.39
Open Water[4]	0.26	14.12
Total[5]	**58.65**	**141.64**

Notes: The land uses shown are general and not representative of official land use designations established in the City's General Plan and Community Plans. Acreages rounded to one-hundredth of an acre.

1 Includes developed and concrete-lined channel.

2 Includes disturbed southern foredunes, disturbed Diegan coastal sage scrub, and non-native woodland.

3 Includes southern coastal salt marsh, beach, and sandstone cliff.

4 Includes subtidal ocean, intertidal ocean, and estuarine.

5 Totals may not sum due to rounding.

The Ocean Beach – Dog Beach project site is approximately 12.84 acres and the survey area is approximately 25.78 acres comprising open space beach and shoreline, and a developed parking lot, with a small portion of native dunes, scrub habitat, and Smiley Lagoon (estuarine and southern coastal salt marsh) in the eastern portion of the survey area (Figure 2a). This survey area is bordered to the southeast by residential development, to the north and west by the outlet of the San Diego River and open waters of the Pacific Ocean, and to the east by Smiley Lagoon. The southern portion is

directly adjacent to Ocean Beach – Pier survey area. While the project site does not include the San Diego River levee, a small portion of the levee falls within the survey area. The northern portion of the Ocean Beach – Dog Beach survey area is in the Multi-Habitat Planning Area (MHPA).

The La Jolla Shores project site is approximately 21.02 acres and the survey area is approximately 35.63 acres and includes open space beach, shoreline, and parkland, bordered to the east by residential development and to the west by the open waters of the Pacific Ocean (Figure 2b).

The Pacific Beach – Tourmaline Surf Park project site is approximately 3.66 acres and the survey area is approximately 11.97 acres containing open space beach and shoreline, and a developed parking lot and stormwater infrastructure. This survey area is bordered to the north, south, and east by residential development and to the west by the open waters of the Pacific Ocean (Figure 2c).

The Mission Beach project site is approximately 8.92 acres and the survey area is approximately 17.09 acres consisting of open space beach and shoreline as well as commercial development, open space park, and a developed parking lot along the eastern edge (Figure 2d). This survey area is bordered to the north and south by residential development, to the east by commercial development and open space parks, and to the west by the open waters of the Pacific Ocean.

The Ocean Beach – Pier project site is approximately 11.90 acres and the survey area is approximately 21.38 acres consisting of open space beach and shoreline, as well as developed parking lot, with a small portion of commercial development along the southeastern edge (Figure 2e). This survey area is bordered to the north by the Ocean Beach – Dog Beach survey area (open beach), to the south and east by residential development, and to the west by the open waters of the Pacific Ocean.

The Sunset Cliffs project site is approximately 0.29 acres and the survey area is approximately 29.79 acres and includes open space shoreline along the west side and a developed roadway and residential buildings along the east side (Figure 2f). The survey area is bordered to the east by residential development and to the west by the open waters of the Pacific Ocean. The southern edge of this survey area, outside of the project site, is in the MHPA.

2.4 Topography and Soils

The survey area is in San Diego County (County), which is in three geographic regions: Coastal Plain, Peninsular Ranges, and the Salton Trough (Desert Basin) (County of San Diego 2011). The survey area is in the Coastal Plain, west of the Peninsular Ranges and Desert Basin. The elevation in the survey area ranges from approximately sea level to 79 feet above mean sea level (amsl) (Figure 3, USGS Topographic Map − Index, and Figures 3a through 3f). The topography of the survey area is highly variable, with the majority of the urban/developed areas gently sloping or relatively flat, and the shorelines and cliffs steeply decreasing in elevation from the ocean. The Coastal Plain region ranges in elevation from zero feet amsl to 600 feet amsl and is characterized by topographic features

including mesa tops, elevated marine terraces, and level floodplains of river valleys (County of San Diego 2011). The survey area is characteristic of elevated marine terraces that occur in the region.

Five soil types are mapped in the survey area (Figure 4, Soils – Index, and Figures 4a through 4f). The five soil types include coastal beaches (La Jolla Shores, Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier), Corralitos loamy sand (0 percent to 5 percent slopes) (La Jolla Shores), lagoon water (Ocean Beach – Dog Beach), Reiff fine sandy loam (2 percent to 5 percent slopes) (Sunset Cliffs), and urban land (entire CRMP Phase 1 area) (USDA 2024). The remaining survey area not defined by a soil type is open water (Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs).

2.5 Hydrology

The survey area lies in three watersheds, the Peñasquitos, the San Diego, and the Pueblo San Diego Hydrologic Units (HU) (Figure 5, Hydrology – Index, and Figures 5a through 5f, National Wetlands Inventory Results). The La Jolla Shores and Pacific Beach – Tourmaline Surf Park project sites are in the Peñasquitos HU; the Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier project sites are in the San Diego HU; and the Sunset Cliffs project site is in the Pueblo San Diego HU.

The Peñasquitos HU (907.0) is a triangular area covering approximately 108,800 acres (Project Clean Water 2024). This hydrologic unit is bordered by the San Dieguito HU to the north and the San Diego HU to the east and south. The Peñasquitos HU includes Rose Creek and several other small creeks. This hydrologic unit drains into Mission Bay and the San Diego River (Project Clean Water 2024).

The San Diego HU (907.1) encompasses approximately 277,760 acres, making it the second largest watershed management area located in San Diego County. It occurs in the central portion of the County and neighbors Peñasquitos and San Dieguito HUs to the north and Pueblo San Diego HU and San Diego Bay HU to the south. The major water bodies in the San Diego HU include the San Diego River, Alvarado Creek, Forester Creek, and Lake Murray. Surface runoff in the San Diego HU primarily drains into the San Diego River and is discharged directly into the Pacific Ocean at Ocean Beach (Project Clean Water 2024).

The Pueblo San Diego HU (908.0) is the smallest of the San Diego County watersheds, covering approximately 38,000 acres or about 14 percent of the San Diego Bay Watershed Management Area. Pueblo San Diego HU has no central stream system and instead consists primarily of a group of relatively small local creeks and pipe conveyances, many of which are concrete-lined and drain directly into San Diego Bay. Major water features in the Pueblo San Diego Hydrologic Unit include Chollas Creek, Paleta Creek, and San Diego Bay (Project Clean Water 2024).

The National Wetlands Inventory and National Hydrography Dataset results identify several aquatic resources in the survey area, primarily the Pacific Ocean, as both estuarine and marine

deepwater and estuarine and marine wetland, to the west of all six sites (Figures 5 and 5a through 5f). The San Diego River is also identified in the National Wetlands Inventory results as estuarine and marine wetland to the north of Ocean Beach – Dog Beach and Ocean Beach – Pier (Figures 5, 5a, and 5e). The National Wetlands Inventory documents a freshwater pond, freshwater forested/shrub wetlands, and riverine features also to the northeast and southeast of the La Jolla Shores project site (Figures 5 and 5b; USFWS 2024a; USGS 2024).

2.6 Climate

On a regional level, the County has a Mediterranean climate, which is characterized by wet winters and dry summers. This is largely because of a semi-permanent high-pressure zone that sits over the Pacific Ocean during much of the year and forms a fog belt (marine layer). The survey area is generally in the Peninsular Ranges of Southern California. The generalized climate in the region is dry, subhumid mesothermal, which pushes the growing season to the wet months of the year (late winter to early spring). The rainy season in the County typically lasts from October through March. Summer months include June, July, August, and September. Native vegetation often goes dormant during the later summer months until the wet season rains start in the fall.

Average temperatures for this area range from 59 to 71 degrees Fahrenheit. Typically, August is the warmest and driest month, February is the wettest month, and December is the coldest month of the year. Average precipitation in the rainy season ranges between 0.63 inch and 2.1 inches per month (October to March). The average annual precipitation for the survey area between 2002 and 2022 was approximately 9 inches. In 2022, the total annual rainfall was 5.4 inches, approximately 1.7 inches less than the previous year (NRCS 2024). As of April 2023, when the majority of the biological resources fieldwork was conducted, the total annual precipitation in the area was 9.6 inches, approximately 7.2 inches greater than April 2022 and 0.2 inches higher than the average annual precipitation between 2002 and 2022.

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Section 3 Regulatory Framework

This section summarizes federal, state, regional, and local regulations, plans, policies, and programs that provide protection and management of sensitive biological resources that are applicable to the project. The federal government administers non-marine plant- and wildlife-related issues through the USFWS, while waters of the United States issues are administered by the U.S. Army Corps of Engineers (USACE). California law relating to wetland, water-related, and wildlife issues is administered by the CDFW. Under CEQA, the CEQA lead agency (in this case, the City) assesses impacts associated with a proposed project or program using significance criteria determined by the CEQA lead agency pursuant to the CEQA Guidelines. Biological resources-related laws and regulations that apply include FESA, the MBTA, the CWA, CEQA, California Endangered Species Act, and CFGC.

The project is required to be in compliance with all federal, state, and local regulations applicable to biological resources as a condition of approval.

3.1 Federal

Coastal Zone Management Act of 1972 (16 USC 1451 through 1464, Chapter 33). This act is administered by the National Oceanic and Atmospheric Administration's Office of Ocean and Resource Management and was established as a national policy to preserve, protect, develop, and—where possible—enhance or restore the Coastal Zone in the United States. California has a federally approved Coastal Zone Management Program, and the Coastal Zone Management Act is administered by the California Coastal Commission (CCC). Therefore, the Coastal Zone Management Program and permit requirements are discussed further in the CCA section under state regulations.

CWA, Section 404 (33 CFR 328.3[a]). These provisions regulate the discharge of dredged or fill material in waters of the United States, including wetlands. Activities that discharge dredge or fill material into waters of the United States can be authorized by the USACE.

On August 29, 2023, the U.S. Environmental Protection Agency and the USACE issued a final rule to amend the final "Revised Definition of Waters of the U.S." The 2023 final rule became effective on September 8, 2023. Under the 2023 final rule:

(a) Waters of the U.S. are defined as:

1. Waters which are:
    i. Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
    ii. The territorial seas; or
    iii. Interstate waters;

2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under (a)(5) of this section;
3. Tributaries of waters identified in (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;
4. Wetlands adjacent to the following waters:
    i. Waters identified in (a)(1) of this section; or
    ii. Relatively permanent, standing or continuously flowing bodies of water identified in (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;
    iii. Intrastate lakes and ponds not identified in (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in (a)(1) or (a)(3) of this section.

FESA, Sections 7 and 9 (16 USC 1531 et seq.; 50 CFR Part 402). This prohibits the "take" (i.e., harm, harass, or kill individuals, or destroy associated habitat) of species federally listed as threatened or endangered. Take incidental to otherwise lawful activities can be authorized by the USFWS through a permit under Sections 4(d), 7, or 10(a).

Magnuson–Stevens Fishery Conservation and Management Act of 1976 (PL-94-265). The Magnuson–Stevens Fishery Conservation and Management Act is the primary law that governs marine fisheries management in U.S. federal waters. First passed in 1976, the act fosters the long-term biological and economic sustainability of marine fisheries.

Marine Mammal Protection Act (16 USC 1361 et seq.). All marine mammals are afforded protection under the Marine Mammal Protection Act. With limited exception, the act makes it illegal to "take" a marine mammal without authorization granted by the National Marine Fisheries Service. "Take" is defined as harassing, hunting, capturing, or killing, or attempting to harass, hunt, capture, or kill any marine mammal. "Harassment" is defined as pursuit, torment, or annoyance, which has the potential to injure a marine mammal in the wild or has the potential to disturb a marine mammal in the wild by causing disruption of behavioral patterns, including but not limited to migration, breathing, nursing, breeding, feeding, or sheltering.

MBTA (16 USC 703–712; 50 CFR 10). The federal MBTA prohibits the direct or indirect take of migratory birds and their active nests unless permitted.

Rivers and Harbors Act, Section 408. Section 408 program allows another party, such as a local government, company, or individual, to alter a USACE Civil Works project. The Section 408 program verifies that changes to authorized USACE Civil Works projects will not be injurious to the public interest and will not impair the usefulness of the project.

Rivers and Harbors Act, Sections 9 and 10. Section 9 of the Rivers and Harbors Act prohibits the construction of any bridge, dam, dike, or causeway over or in navigable waterways of the United

States without Congressional approval. Administration of Section 9 has been delegated to the U.S. Coast Guard. Consultation with the U.S. Coast Guard may be necessary to determine if a Section 9 permit would be required under the Rivers and Harbors Act.

Section 10 of the Rivers and Harbors Act requires that permits be obtained from the USACE in navigable waters of the United States for all structures such as riprap and activities such as dredging. USACE grants or denies Section 10 permits based on the effects on navigation. Most projects covered under this act are also covered under Section 404 of the CWA.

3.2 State

Areas of Special Biological Significance. Under Resolution No. 74-28, the California State Water Resources Control Board designated certain Areas of Special Biological Significance (ASBS) to adopt water quality control plans for the control of waste discharges into ocean waters. The ASBS afford special protection to marine life through the prohibition of waste discharges within these areas. The following restrictions and prohibitions apply to ASBS:

1. Discharge of elevated temperature wastes in a manner that would alter natural water quality conditions.
2. Discharge of discrete point source sewage or industrial process wastes in a manner that would alter natural water quality conditions.
3. Discharge of wastes from nonpoint sources, including but not limited to stormwater runoff, silt and urban runoff, will be controlled to the extent practicable. In control programs for wastes from nonpoint sources, Regional Boards will give high priority to areas tributary to ASBS.
4. The Ocean Plan, and hence the designation of areas of special biological significance, is not applicable to the vessel wastes, the control of dredging, or the disposal of dredging spoil.

In 1983, the State Water Board's Ocean Plan officially prohibited all polluted runoff and discharges into ASBS.

The survey area, specifically the La Jolla Shores project survey area, borders the La Jolla ASBS to the west, which covers approximately 453 acres and includes La Jolla Cove and the biologically-rich kelp forests and rocky reef to the north along the coast, ending south of Scripps Pier.

Birds of Prey Protection Provision (CFGC Section 3503.5). This provision prohibits the taking of birds of prey (order Falconiformes and Strigiformes) including their nests and eggs.

CCA and CCC. The CCC was established by voter initiative in 1972 and was made permanent by the California Legislature through the adoption of the CCA of 1976 (California Public Resources Code, Section 30000 et seq.). The CCC, in partnership with coastal cities and counties, plans and regulates the use of land and water in the Coastal Zone. Under the CCA, cities and counties are responsible for preparing Local Coastal Programs to obtain authority to issue Coastal Development

Permits for projects in their jurisdiction. Local Coastal Programs consist of land use plans, zoning ordinances, zoning maps, and other implementing actions that conform to CCA policies. Until an agency has a fully certified Local Coastal Program, the CCC is responsible for issuing Coastal Development Permits.

Under the CCA, Section 30107.5 labels environmentally sensitive habitat areas are areas in the Coastal Zone "in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments."

Section 30240 of the CCA states:

- Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

In addition, the CCC regulates impacts to coastal wetlands defined in Section 30121 of the CCA as "lands in the Coastal Zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens." Under the CCC's definition of wetlands (see California Code of Regulations, Section 13577[b]), a wetland need only display one of the parameters typically used to define wetland areas, in contrast to the USACE, which uses a three-parameter definition under its federal authorities. The CCA requires that most development avoid and buffer coastal wetland resources in accordance with Sections 301231 and 30233, including limiting the filling of wetlands to certain allowable uses.

The survey area is entirely in the Coastal Zone and, therefore, is subject to the CCA.

California Endangered Species Act (CFGC Section 2050 et seq.). Section 2050 of the CFGC prohibits any activities that would jeopardize or take a species designated as threatened or endangered by the state.

CFGC Section 1602. Section 1602 regulates water resources in the State of California. Activities that divert or obstruct the natural flow of, or change or use material from the bed, channel, or bank of any river stream or lake may be authorized by the CDFW. CDFW jurisdiction includes intermittent and perennial watercourses and extends to the top of the bank of a stream or lake if unvegetated or to the limit of the adjacent riparian vegetation, located contiguous to the watercourse, if the stream or lake is vegetated.

CFGC Section 3503. Section 3503 of the CFGC prohibits the take, possession, or needless destruction of the nests or eggs of any birds, except as otherwise provided by the code or any regulation made pursuant thereto.

CEQA, as amended (PRC Section 21000 et seq.). The goal of CEQA is to assist California public agencies in identifying potential significant negative environmental impacts caused by their actions and avoiding or mitigating those impacts when feasible.

California Fully Protected Wildlife Species Provision (CFGC Sections 3511, 4700, 5050, and 5515). These provisions prohibit the taking of fully protected birds, mammals, amphibians, and fish.

California Native Plant Protection Act of 1977 (CFGC Sections 1900–1913). These provisions preserve, protect, and enhance endangered or rare native plants of the state.

Marine Life Management Act of 1999. The Marine Life Management Act, introduced as Assembly Bill 1241 and became law on January 1, 1999, delegated greater management authority to the California Fish and Game Commission and the CDFW for the management and conservation of California's marine living resources. Under the Marine Life Management Act, three marine protected areas (MPA) designations were established (state marine reserves, state marine parks, and state marine conservations areas), one marine managed area (state marine recreational management area) and special closures were used in the MPA planning process.

The survey area, specifically the La Jolla Shores project, borders an MPA to the west, the Matlahuayl State Marine Reserve (SMR). Within the Matlahuayl SMR, it is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource.

Regional Water Quality Control Board. The Regional Water Quality Control Board (RWQCB) regulates impacts to water quality under Section 401 of the CWA. A project must comply with Section 401 of the CWA before the USACE can issue a Section 404 Permit. The RWQCB will issue a Section 401 Water Quality Certification or Waiver of Certification, depending on the extent of impacts to waters of the United States. The RWQCB also regulates impacts to waters of the state (usually limited to “isolated” waters or swales that may not fall under USACE jurisdiction) under the Porter-Cologne.

Streambed Alteration Agreement (CFGC Section 1600). The CFGC requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or their tributaries, or use materials from a streambed, to submit a notification for a Streambed Alteration Agreement to the CDFW.

Natural Community Conservation Planning Act, as amended (CFGC Sections 2800–2835). The primary objective of the Natural Community Conservation Planning program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks

to anticipate and prevent the controversies and gridlock caused by species' listing by focusing on the long-term suitability of wildlife and plant communities and including key interests in the process.

Porter-Cologne. Porter-Cologne is regulated by the RWQCB for impacts to waters of the state. Although water quality issues related to impacts to waterways are normally addressed during Section 401 Water Quality Certification, should a water of the State of California be determined by the USACE not to have CWA jurisdiction, Porter-Cologne would be addressed under a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending on the level of impact and the properties of the waterway.

3.3 Local

3.3.1 City of San Diego General Plan

The project is in the City and, therefore, is subject to the goals and policies in the City's General Plan (City of San Diego 2024). The City's General Plan was adopted in March 2008 and was most recently amended in August 2021. The City's General Plan provides policy guidance to balance the needs of a growing city while enhancing the quality of life for current and future San Diegans. It includes the City of Villages strategy, which outlines how the City can enhance its many communities and neighborhoods as growth occurs over time. The City's General Plan contains 10 elements that provide a comprehensive "blueprint" for the City's growth over the next 20 plus years. As shown on the City's General Plan Land Use Map (Figure LU-2), the majority of the survey area is designated as Park, Open Space, and Recreation, with the eastern edges designated as Residential. Project consistency with the City of San Diego General Plan Conservation and Recreation Elements is discussed in Section 6.1.1.

3.3.2 City of San Diego Land Development Code Regulations – Environmentally Sensitive Lands Regulations

The ESL regulations in Chapter 14, Article 3, Division 1 (Section 143.0101), of the City's LDC (City of San Diego 2018) are intended to ensure that development, including but not limited to coastal development in the COZ, occurs in a manner that protects the overall quality of specific natural resources, as defined in the City's LDC, and is consistent with sound resource conservation principles and the rights of private property owners. These regulations and accompanying guidelines for biological resources, steep hillsides, Special Flood Hazard Areas, and coastal bluffs and beaches are intended to serve as standards for the determination of impacts and mitigation under the CEQA Statute and Guidelines and the CCA. Development on a site containing ESL requires a Site Development Permit in accordance with LDC Section 125.0502.

3.3.3 City of San Diego Biology Guidelines

The City of San Diego Development Services Department developed the Biology Guidelines presented in the Land Development Manual "to aid in the implementation and interpretation of the

ESL regulations, LDC, Chapter 14, Division 1, Section 143.0101 et seq., and the Open Space Residential (OR-1-2) Zone, Chapter 13, Division 2, Section 131.0201 et seq." (City of San Diego 2018). The Biology Guidelines also provides standards for the determination of impacts and mitigation under CEQA and the CCA. Biological technical report supplemental guidelines were provided in the 2018 update of the 2012 Biology Guidelines. Sensitive biological resources, as defined by the ESL regulations, include lands in the MHPA, as discussed in Section 3.3.4.2, Multi-Habitat Planning Area, of this report, as well as other lands outside the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, threatened, or endangered species; or narrow endemic species.

The City's definition of wetlands (in Section I of the Biology Guidelines) is broader than the definition applied by the USACE. The City uses the criteria listed in Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 320–330) to apply an appropriate buffer around wetlands that serves to protect the function and value of the wetland. Guidelines that supplement the development regulation requirements described in this section are provided in the Biology Guidelines (City of San Diego 2018). The survey area contains aquatic resources in the Coastal Overlay Zone (COZ) that would be considered wetlands and, therefore, would require adherence to the applicable COZ wetland buffer regulations (City of San Diego 2018). According to the Biology Guidelines, a wetland buffer is an area surrounding a wetland that helps protect the function and value of the adjacent wetland by reducing physical disturbance, provides a transition zone where one habitat phases into another, and acts to slow flood waters for flood and erosion control, sediment filtration, water purification, and groundwater recharge (City of San Diego 2018). Within the COZ, wetland buffers should be a minimum of 100 feet wide (as determined on a case-by-case basis in consultation with the CDFW, USFWS, and USACE) adjacent to a wetland. The width of the buffer is determined by factors such as the type and size of development, sensitivity of the wetland resource to edge effects, topography, and need for upland transition (City of San Diego 2018). The Biology Guidelines (City of San Diego 2018) also ranks upland habitat values by rarity and sensitivity. The most sensitive habitats are Tier I, and the least sensitive are Tier IV. The varying mitigation ratios and requirements that mitigation be either in tier or in kind are based on the sensitivity of the habitat being affected provided in Table 3 of the Biology Guidelines (City of San Diego 2018). Mitigation ratios for impacts to sensitive habitats are also determined based on the relationship between impacts and mitigation relative to their location inside or outside the MHPA boundary.

3.3.4 San Diego Multiple Species Conservation Program

The City is a participant in the regional County of San Diego MSCP, a cooperative federal, state, and local environmental conservation program aimed at preserving San Diego's unique native plants and animals (covered species) (County of San Diego 1998). The plan's boundaries extend over multiple jurisdictions and environments including regional watersheds and migratory wildlife corridors. The plan

also protects the region's diverse native plant and wildlife species, including those that are threatened and endangered. The MSCP also provides provisions and regulations that accommodate future growth and streamline building regulations while protecting natural resources in the region.

3.3.4.1 City of San Diego Multiple Species Conservation Program Subarea Plan

The MSCP SAP was adopted in 1997 and encompasses 206,124 acres in the regional MSCP Study Area (City of San Diego 1997). The SAP delineates a MHPA where preserve planning is focused and permanent conservation of habitat lands will be accomplished and includes a process for the issuance of permits under the California Natural Communities Conservation Planning Act of 1991, FESA, and California Endangered Species Act (as discussed previously in Section 3.2, State). The MSCP SAP is characterized by predominantly urban land uses, including associated parks and open space. The MSCP SAP separates the City into geographic subunits. The project is located in the Urban Area, which encompasses the central coastal and central eastern portions of San Diego, including Point Loma and other Urban Habitat Areas. More specifically, the Urban Habitat Areas include existing designated open space such as Mission Bay; Tecolote Canyon; Marian Bear Memorial Park; Rose Canyon; San Diego River; the southern slopes along Mission Valley, Carroll, and Rattlesnake Canyons; Florida Canyon; Chollas Creek; and a variety of smaller canyon systems. The majority of these lands consist of canyons with native habitats in relative proximity to other MHPA areas providing habitat. These areas contribute in some form to the MHPA, either by providing habitat for native species to continue to reproduce and find new territories or by providing necessary shelter and forage for migrating species. Project consistency with the MSCP SAP General Management Directives and Area-Specific Management Directives (ASMDs) is discussed in Section 6.1.1.

3.3.4.2 Multi-Habitat Planning Area

The City's MHPA identifies a "hard line" boundary developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. Sections of the project would be in and adjacent to the MHPA (Figures 2, 2a, and 2f). The MHPA identifies biological core resource areas and corridors targeted for conservation in which only limited development may occur. The MHPA is considered an urban preserve that is constrained by existing or approved development and is composed of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involve maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside the MHPA either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. Critical habitat linkages between core areas are conserved in a functional manner with a minimum of 75 percent of the habitat within identified linkages conserved (City of San Diego 1997). Project consistency with the MSCP SAP General Planning Policies and Design Guidelines is discussed in Section 6.1.2.

3.3.4.3 Multi-Habitat Planning Area Land Use Adjacency Guidelines

Land uses adjacent to or within the MHPA would be managed to ensure minimal impacts to the MHPA. Consideration would be given to good planning principles in relation to adjacent land uses. The MHPA Land Use Adjacency Guidelines (LUAGs) will be incorporated into the applicable future site-specific project permits during the development review phase of the project. The LUAGs address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development. Project consistency with the Multi-Habitat Planning Area Land Use Adjacency Guidelines is discussed in Section 6.1.3.

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Section 4 Methods

Before the biological resources surveys were performed, sensitive biological resources with potential to occur in the survey area were identified through a review of existing maps, literature and reports from other biological studies conducted in the survey area, and sensitive species occurrence databases.

4.1 Literature Review

The following databases and publications were reviewed before the biological resource surveys were conducted:

- Calflora Database (Calflora 2024)
- CNPS Inventory of Rare and Endangered Plants (CNPS 2024)
- CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2024a)
- CDFW California Natural Diversity Database (CDFW 2024b)
- City of San Diego MSCP SAP (City of San Diego 1997)
- City's Municipal Code, Biology Guidelines (City of San Diego 2018a)
- San Diego County Bird Atlas (Unitt et al. 2004)
- San Diego Geographic Information Source SanBIOS database (SanGIS 2024)
- U.S. Department of Agriculture Soil Survey (USDA 2024)
- USFWS National Wetlands Inventory Wetlands Mapper (USFWS 2024a)
- USFWS Information for Planning and Consultation (USFWS 2024b)

4.2 General Biological Surveys

Harris biologists conducted three general biological reconnaissance surveys by walking transects throughout the survey area on April 12 and 13 and August 1, 2023. During the surveys, the biologists mapped vegetation communities, documented observed plant and wildlife species, and evaluated the potential for occurrence of sensitive plant and wildlife species.

The Harris 2023 biological surveys were conducted in accordance with the City's Guidelines for Conducting Biological Surveys (City of San Diego 2018). No focused protocol surveys, rare plant surveys, or formal aquatic resources delineations were conducted during this survey effort.

Discussions of the 2023 surveys conducted in the survey area are provided in the following subsections.

4.2.1 Vegetation and Land Cover Type Mapping

Vegetation communities and land cover types observed in the survey area were mapped by Harris biologists using Geographic Information Systems aerial maps connected to an iSXBlue II Global Positioning System receiver for maximum accuracy. The vegetation communities and land cover

types were documented by walking meandering transects through the survey area (where accessible). As adopted in the Biology Guidelines (City of San Diego 2018), the vegetation community and land cover type mapping is in accordance with the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) as modified by the County and noted in Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). Areas observed supporting less than 30 percent native plant species cover were mapped as disturbed land, and areas supporting at least 20 percent native plant species, but fewer than 50 percent native cover, were mapped as a disturbed native vegetation community (e.g., disturbed coastal dune).

4.2.2 Plant and Wildlife Species Observations

Wildlife identifications were made in the field directly through visual observation or indirectly through call, burrow, track, or scat detection. Latin and common names of wildlife follow Crother (2012) for reptiles and amphibians, American Ornithological Society (2018) for birds, Wilson and Reeder (2005) for mammals, San Diego Natural History Museum (SDNHM) (2002) for butterflies, and Moyle (2002) for fish.

Plant and wildlife species observed during the surveys were recorded in field notebooks, and sensitive species locations were recorded in the Global Positioning System-enabled ArcGIS Collector application. Complete lists of observed plant and wildlife species are provided in Appendix B, Species Observed.

In addition to species detected during the surveys, the survey area was assessed for the potential of sensitive plant and wildlife species to occur on site, the results of which are presented in Section 5.4, Sensitive Species. Determinations were made through assessment of habitat preferences, knowledge of local and regional distributions, and review of pertinent literature and local recorded occurrences.

Plants that could not be identified in the field by the surveyors were collected and subsequently identified using the Jepson Manual, Vascular Plants of California, Second Edition (Baldwin et al. 2012). Plant nomenclature follows the Checklist of the San Diego County Plant Atlas (SDNHM 2022) and Baldwin et al. (2012) where appropriate. Non-native invasive plant species were identified using California Invasive Plant Council's California Invasive Plant Inventory rating criteria (Cal-IPC 2024).

4.3 Survey Limitations

No focused sensitive plant or protocol sensitive wildlife surveys were conducted within the survey area during the 2023 surveys. Plants and wildlife were identified by direct observation, vocalizations, or other observance, including tracks, scat, and other signs. Therefore, lists of observed species are not necessarily comprehensive because species can be outside their blooming periods and/or in senescence, nocturnal, secretive, or within the region (survey area) seasonally or during migration only and, therefore, may not have been observed.

Some areas were not directly surveyed due to a lack of habitat (i.e., developed areas) or being inaccessible on foot (i.e., open water, private residences). These areas were either not directly reviewed or were only visually scanned rather than walked. No in-water surveys were performed during the 2023 surveys. Therefore, marine species, both wildlife and plants, may be occurring in these areas but were not observed.

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Section 5 Results

The results presented below reflect data collected during the 2023 surveys conducted in the survey area.

5.1 Vegetation Communities and Land Cover Types

The survey area is in the Southern Coast Ranges subregion of the California Floristic Province (Jepson Online 2024). The vegetation classifications in this report conform to the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) as modified by the County and noted in Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008).

Eleven vegetation communities and land cover types were identified in the survey area (Figure 6, Vegetation Communities and Land Cover Types – Index, and Figures 6a through 6g). Table 2a, Wetland Vegetation Communities and Land Cover Types in the CRMP Phase 1 Area and Survey Buffer (Acres), and Table 2b, Upland and Other Vegetation Communities and Land Cover Types in the CRMP Phase 1 Area and Survey Buffer (Acres), include the documented vegetation communities and land cover types, including sensitive communities (Tier I–IV and wetlands), separated into the project sites and survey buffer in which they occur.

Table 2a. Wetland Vegetation Communities and Land Cover Types in the CRMP Phase 1 Area and Survey Buffer (Acres)

General Vegetation Type (Holland/ Oberbauer Code)	Biology Guidelines Vegetation Community	Tier/ Wetland[1]	CRMP Phase 1 Area (PA)/Survey Buffer (SB)												Total[2] (acres)		Grand Total[2] (acres)
			La Jolla Shores		Pacific Beach – Tourmaline Surf Park		Mission Beach		Ocean Beach – Dog Beach		Ocean Beach – Pier		Sunset Cliffs				
			PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	
Wetland Communities																	
Subtidal Ocean (64111)	Marine Habitat	Wetland	—	3.05	—	0.36	—	3.67	—	0.24	—	2.64	—	2.16	—	12.12	12.12
Intertidal Ocean (64112)	Marine Habitat	Wetland	—	—	—	—	—	—	—	—	—	—	—	0.74	—	0.74	0.74
Estuarine (64130)	Marine Habitat	Wetland	—	—	—	—	—	—	0.26	0.99	—	—	—	—	0.26	0.99	1.25
Southern Coastal Salt Marsh (52120)	Marine Habitat	Wetland	—	—	—	—	—	—	0.06	0.82	—	—	—	—	0.06	0.82	0.88
Beach (64400)	Marine Habitat	Wetland	11.18	4.11	1.48	2.08	8.13	1.36	4.93	3.69	8.02	1.25	—	2.87	33.74	15.37	49.11
Concrete Channel	Disturbed Land	IV	—	—	0.05	0.35	—	—	—	—	—	—	—	—	0.05	0.35	0.40
		Total[2]	**11.18**	**7.16**	**1.53**	**2.79**	**8.13**	**5.03**	**5.25**	**5.74 8.02**	**3.89**	**—**	**5.77**	**34.11**	**30.39**	—	
		Grand Total[2]	**18.34**		**4.32**		**13.16**		**11.00**		**11.91**		**5.77**		**64.50**		

Notes: PS = Project Sites; SA = Survey Area; SB = Survey Buffer; SDBG = Land Development Code—Biology Guidelines

[1] City MSCP Subarea Plan tiers and wetland identification are from the SDBG (City of San Diego 2018).

[2] Totals may not sum due to rounding.

Table 2b. Upland and Other Vegetation Communities and Land Cover Types in the CRMP Phase 1 Area and Survey Buffer (Acres)

General Vegetation Type (Holland/ Oberbauer Code)	Biology Guidelines Vegetation Community	Tier/ Wetland[1]	CRMP Phase 1 Area (PA)/Survey Buffer (SB)												Total[2] (acres)		Grand Total[2] (acres)
			La Jolla Shores		Pacific Beach – Tourmaline Surf Park		Mission Beach		Ocean Beach – Dog Beach		Ocean Beach – Pier		Sunset Cliffs				
			PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	PA	SB	
Upland Communities																	
Southern Foredunes[3] (Disturbed) (21230)	Southern Foredunes	I	—	—	—	—	—	—	0.59	0.42	—	—	—	—	0.59	0.42	1.01
Diegan Coastal Sage Scrub[3] (Disturbed) (32500)	Coastal Sage Scrub	II	—	—	—	—	—	—	0.86	1.10	—	—	—	—	0.86	1.10	1.96
Sandstone Cliff	None	None	—	—	0.09	1.75	—	—	—	—	—	—	0.02	7.53	0.11	9.28	9.39
Non-Native Woodland (79000)	Eucalyptus Woodland	IV	—	—	0.45	0.55	—	—	—	—	—	—	—	—	0.45	0.55	1.00
Other Land Cover Types																	
Developed (12000)	Disturbed Land	IV	9.84	7.44	1.59	3.22	0.79	3.14	6.14	5.69	3.88	5.58	0.26	16.20	22.50	41.27	63.77
		Total[2]	**9.84**	**7.44**	**2.13**	**5.52**	**0.79**	3.14	**7.59**	**7.21**	**3.88**	5.58	**0.28**	**23.73**	**24.51**	**52.62**	—
		Grand Total[2]	**17.28**		**7.65**		**3.93**		**14.80**		**9.46**		**24.01**		**77.13**		

Notes: PA = CRMP Phase 1 area; SA = Survey Area; SB = Survey Buffer; SDBG = Land Development Code—Biology Guidelines

[1] City MSCP Subarea Plan tiers and wetland identification are from the SDBG (City of San Diego 2018).

[2] Totals may not sum due to rounding.

[3] Sensitive vegetation community in the City of San Diego Biology Guidelines (City of San Diego 2018).

5.1.1 Aquatic, Wetland, and Associated Communities

5.1.1.1 Subtidal Ocean (64111), Wetland

According to Oberbauer et al. (2008), the subtidal ocean zone along the Pacific Ocean coast extends seaward from the low tide line to and including the depth of ocean floor that supports canopy forming kelps in the proper substrate, usually down to 120 feet below the surface. Subtidal ocean is considered a wetlands community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 12.12 acres of subtidal ocean was documented and is limited to the CRMP Phase 1 area survey buffer (Figures 6 and 6a through 6g). The subtidal ocean is along the western edges of the survey area and extends west from the low tide line to the open Pacific Ocean and includes permanently inundated marine habitats.

5.1.1.2 Intertidal Ocean (64112), Wetland

Intertidal ocean includes the area exposed by low tide up to and including the spray zone (Oberbauer et al. 2008). The intertidal ocean zone along the Pacific Ocean coast includes rocky zones periodically submerged by water depending on the tides. This zone is typically unvegetated, but species of algae (*Algae* sp.) and Scouler's surfgrass (*Phyllospadix scouleri*) often occur. Intertidal ocean is considered a wetlands community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 0.74 acre of intertidal ocean was documented and is limited to the survey buffer of the Sunset Cliffs project site (Figures 6, 6f, and 6g). Intertidal ocean in the survey buffer of the Sunset Cliffs project site includes rocky tidepools between the low tide line and spray zone. Various algae species were observed growing in patches in the tidepools, but this community is primarily unvegetated.

5.1.1.3 Estuarine (64130), Wetland

Estuarine habitats occur on periodically and permanently flooded substrates and open water portions of semi-enclosed coastal waters where tidal seawater is diluted by flowing fresh water (Oberbauer et al. 2008). Salinity and depth vary dramatically in estuarine habitats, resulting in high species richness but low diversity of phyla. Within the County, estuarine habitats commonly occur at the drowned mouths of perennial rivers that are tributary to the Pacific Ocean.

A total of approximately 1.25 acres of estuarine habitat was documented and is limited to the eastern portion of the Ocean Beach – Dog Beach project site, with 0.26 acre in the site and 0.99 acre in the survey buffer (Figures 6 and 6a). The estuarine habitat in the survey area is known as the western extent of Smiley Lagoon and was flooded with approximately 2 feet of water during the August 2023 survey period. The substrate of the estuarine habitat in the survey area was primarily submerged mud with a thick layer of algae growing over most of the bottom. The

estuarine habitat in the survey area is fringed with southern coastal salt marsh, which is discussed in detail in the next subsection.

5.1.1.4 Southern Coastal Salt Marsh (52120), Wetland

Southern coastal salt marsh is a wetland habitat that develops where the water table is at or just above the ground surface, such as around the margins of bays, lagoons, and estuaries along the coast (Oberbauer et al. 2008). Southern coastal salt marsh occurs at locations with warmer water and air temperatures and has a longer growing season than northern coastal salt marsh. Southern coastal salt marsh is considered a wetlands community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 0.88 acre of southern coastal salt marsh was documented and is limited to the eastern portion of the Ocean Beach – Dog Beach project site, with 0.06 acre on the site and 0.82 acre in the survey buffer (Figures 6 and 6a). Southern coastal salt marsh in the survey area is dominated by saltgrass (*Distichlis spicata*) and pickleweed (*Salicornia pacifica*), with a small amount of alkali heath (*Frankenia salina*) along the edges.

5.1.1.5 Beach (64400), Wetland

Beach is characterized as sandy and/or cobbly habitat on coastal strands, lagoons, or lakes, with ocean beaches comprising a shoreline feature of deposited sand formed by waves and tides off the coast (Oberbauer et al. 2008). Beaches are typically unvegetated areas, however, upper portions may be sparsely populated with herbaceous species. Beach is a wetlands community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 49.11 acres of beach was documented, with 33.74 acres occurring in the La Jolla Shores, Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier project sites, and the remaining 15.37 acres in the survey area buffer (Figures 6 and 6b through 6g). The beaches throughout the survey area are unvegetated and vary from fine sand to cobble and rocky shoreline, and eroded sandstone surrounded by loose sand.

5.1.1.6 Concrete Channel

Concrete channel is not categorized by Oberbauer et al. (2008) but most closely resembles non-vegetated channel (64200) in function as a waterway. Concrete channel is a concrete-lined waterway, typically artificially constructed to direct urban stormwater flows downstream to larger aquatic areas, including creeks, rivers, lakes, and ultimately to the ocean. Concrete channels can also be previously naturally occurring drainage channels that have been lined with concrete to reduce erosion for urban stormwater control purposes. Concrete channel is not included in the Biology Guidelines vegetation or land cover tiers but would likely be considered a Tier IV land cover because it has an artificial substrate, does not support vegetation, and provides limited

aquatic wildlife habitat. However, because concrete channels function as waterways and have the potential to be under the jurisdiction of and regulated by the water resource agencies (CDFW, RWQCB, and USACE), concrete channel is categorized as an aquatic land cover type.

A total of approximately 0.40 acre of concrete channel was documented, with 0.05 acre occurring in Pacific Beach – Tourmaline Surf Park project site and 0.35 acre in the survey buffer of this site (Figures 6 and 6c). A large concrete stormwater culvert occurs at the eastern and upstream end of the concrete channel. The concrete channel in the survey area is unvegetated and appears to convey stormwater from the urban residential areas east of the survey area directly to the Pacific Ocean to the west.

5.1.2 Upland Communities

5.1.2.1 Southern Foredunes (Disturbed) (21230), Tier I

Southern foredunes are dominated by succulents, perennial herbs, and subshrubs, with a higher proportion of woody plants up to 30 centimeters tall (Oberbauer et al. 2008). Southern foredunes are found in areas of sand accumulation along the coast between Point Conception and the U.S./Mexico International border. This habitat is characterized by a drier, warmer, and less strong and persistent onshore wind (Oberbauer et al. 2008). Typical southern foredune species include red sand-verbena (*Abronia maritima*), beach sand verbena (*Abronia umbellata*), beach bur (*Ambrosia chamissonis*), beach saltbush (*Atriplex leucophylla*), sea rocket (*Cakile maritima*), beach morning glory (*Calystegia soldanella*), beach evening primrose (*Camissonia cheiranthifolia*), saltgrass, and (sometimes) non-native iceplant (*Carpobrotus edulis*). Southern foredunes are considered a Tier I sensitive vegetation community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 1.01 acres of disturbed southern foredunes was documented, with 0.59 acre occurring in the eastern portion of the Ocean Beach – Dog Beach project site, and the remaining 0.42 acre in the eastern portion of the Ocean Beach – Dog Beach survey buffer (Figures 6 and 6a). In the Ocean Beach – Dog Beach project site, the southern foredunes are the westernmost end of a larger southern foredune habitat that extends between the sandy beach of Ocean Beach Dog Beach and Smiley Lagoon. This portion of the dunes appears to be previously mechanically disturbed from past construction of the San Diego River Bikeway to the south and is currently continuously disturbed by the high volume of human and domestic pet (dog) activity associated with Ocean Beach Dog Beach to the west and north. The area appears to be part of restoration efforts and shows evidence of purposefully planted (installed) vegetation. Species occurring in this disturbed southern foredune habitat in the survey area include beach common fiddleneck (*Amsinckia intermedia)*, California brittle bush (*Encelia californica*), and coastal goldenbush (*Isocoma menziesii*).

5.1.2.2 Diegan Coastal Sage Scrub (Disturbed) (32500), Tier II

Diegan coastal sage scrub is composed of a variety of soft, low, aromatic shrubs, characteristically dominated by drought-deciduous species, such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.), with scattered evergreen shrubs, including lemonade berry (*Rhus integrifolia*) and laurel sumac (*Malosma laurina*) (Oberbauer et al. 2008). Diegan coastal sage scrub is considered a Tier II sensitive vegetation community according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 1.96 acres of Diegan coastal sage scrub was documented, with 0.86 acre occurring in the eastern portion of the Ocean Beach – Dog Beach project site and the remaining 1.10 acres in the eastern portion of the Ocean Beach – Dog Beach survey buffer (Figures 6 and 6a). In the Ocean Beach – Dog Beach project site, the Diegan coastal sage scrub is continuously mechanically disturbed by the high volume of human and domestic pet (dog) activity associated with Ocean Beach Dog Beach to the west and north and residences to the east. The area appears to be part of restoration efforts and shows evidence of purposefully planted (installed) vegetation. The Diegan coastal sage scrub dominant plant species in the Ocean Beach – Dog Beach project site include California sagebrush (*Artemisia californica)*, California buckwheat (*Eriogonum fasciculatum*), California brittle bush, rattail sixweeks grass (*Festuca myuros*), soft brome (*Bromus hordeaceus*), and various prickly pear cactus (*Opuntia* sp.) species.

5.1.2.3 Sandstone Cliff

Sandstone cliff is not categorized by Oberbauer et al. (2008) but most closely resembles disturbed habitat (11000) because of occurring in highly populated coastal areas, being characterized by predominantly non-native species introduced through human action and receiving water from precipitation or runoff. Sandstone cliff is not included in the Biology Guidelines vegetation or land cover tiers but would likely be considered an upland community based on the sparse vegetation it supports and its proximity and functional connectivity to other upland habitats (City of San Diego 2018).

Approximately 9.39 acres of sandstone cliffs were documented, with 0.11 acre in the Pacific Beach – Tourmaline Surf Park and Sunset Cliffs project sites, and the remaining 9.28 acres in the survey buffer of these project sites. The sandstone cliffs in the survey area are primarily unvegetated, with patches of sparse, predominantly non-native plant species, including ice plants (*Carpobrotus edulis* and *Mesembryanthemum crystallinum*), pampas grass (*Cortaderia selloana*), and cheeseweed (*Malva parviflora*). Small patches of native seacliff buckwheat (*Eriogonum parviflorum)* occur on the sandstone cliffs in the survey buffer of the Sunset Cliffs project site, however, the sparse vegetation that occurs on the sandstone cliffs is highly disturbed by the high volume of human and domestic pet (dog) activity associated with the coastal walking trail and residential development directly to the east.

5.1.2.4 Non-Native Woodland (79000), Tier IV

Non-native woodland consists of exotic trees, usually intentionally planted, which are not maintained or artificially irrigated (Oberbauer et al. 2008). Characteristic species in non-native woodland includes eucalyptus (*Eucalyptus* sp.), tamarisk (*Tamarix* sp.), pines (*Pinus* sp.), or other non-native species. Non-native woodland is considered a Tier IV land cover according to the Biology Guidelines (City of San Diego 2018).

A total of approximately 1.00 acre of non-native woodland was documented, with 0.45 acre occurring in the northeastern portion of the Pacific Beach – Tourmaline Surf Park project site and the remaining 0.55 acre in the northeastern survey buffer of this site (Figures 6 and 6c). The non-native woodland in the Pacific Beach – Tourmaline Surf Park project site and the survey buffer are dominated by pines and eucalyptus trees, with bare ground and herbaceous weedy species in the understory.

5.1.3 Other Land Cover Types

5.1.3.1 Developed (12000), Tier IV

Developed land refers to areas that have been constructed upon or disturbed so severely that native vegetation is no longer supported. Developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials (Oberbauer et al. 2008). Examples of these areas may include graded landscapes or areas, graded firebreaks, graded construction pads, construction staging areas, or areas that are repeatedly used in ways that prevent revegetation (e.g., parking lots, trails that have persisted for years). Although not listed in the Biology Guidelines, developed land is assumed to be a Tier IV land cover (City of San Diego 2020).

A total of approximately 63.77 acres of developed land occurs along the eastern portion of the survey area and is the dominant land cover type (Figures 6 and 6a through 6g). Approximately 22.56 acres of developed land occur in the CRMP Phase 1 area with the remaining 41.27 acres in the survey buffer. The developed land in the survey area includes paved parking lots, roadways, and sidewalks, as well as residential and commercial buildings and associated landscaped areas. One portion of the developed land in the Sunset Cliffs survey buffer consists of areas of the sandstone cliffs that have been modified with riprap and Gabion walls placed there for cliff stabilization and erosion control (Figures 6, 6f, and 6g).

5.2 Jurisdictional Aquatic Resources

During the 2023 biological resources survey, Harris observed a total of approximately 64.50 acres of aquatic resources in the survey area that may be considered wetland and non-wetland waters and therefore may potentially fall under the jurisdiction of the USACE, RWQCB, CCC, and CDFW,

and/or be considered wetlands regulated by the City. Of the aquatic resources observed, approximately 34.11 acres occur in all six project sites, and the remaining 30.76 acres are in the survey buffer. Potentially jurisdictional aquatic resources observed in the survey area are shown on Figure 7, Jurisdictional Aquatic Resources – Index, and Figures 7a through 7g. Table 3, Jurisdictional Aquatic Resources in the CRMP Phase 1 Area and Survey Buffer (Acres), provides a summary of these potential aquatic resources that may fall under the jurisdiction of the USACE, RWQCB, CCC, CDFW, and/or City.

Table 3. Jurisdictional Aquatic Resources in the CRMP Phase 1 Area and Survey Buffer (Acres)

General Vegetation Type	Biology Guidelines Vegetation Community	Jurisdiction	Total[1] (acres)	
			PS	SB
Wetland Waters				
Southern Coastal Salt Marsh (52120)	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	0.06	0.82
Non-Wetland Waters				
Subtidal Ocean	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	—	12.12
Intertidal Ocean	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	—	0.74
Estuarine	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	0.26	0.99
Beach	Marine Habitat	USACE/RWQCB/CCC/CDFW/City	33.74	15.37
Concrete channel	Disturbed Land	USACE/RWQCB/CCC/CDFW/City	0.05	0.35
		Total[1]	**34.11**	**30.39**
		Grand Total[1]	**64.50**	

Note: PS = Project Sites; SB = Survey Buffer; Biology Guidelines = City of San Diego Biology Guidelines; CCC = California Coastal Commission; CDFW = California Department of Fish and Wildlife; RWQCB = Regional Water Quality Control Board; USACE = U.S. Army Corps of Engineers

[1] Acreage may not sum due to rounding.

5.3 Observed Species

5.3.1 Plant Species

The survey area consists mainly of open beach, marine waters, and developed land. No in-water surveys occurred, and therefore, the observed plant species list does not include all the aquatic plant species that may be in existence in the subtidal and intertidal ocean areas. Appendix B lists the vascular plant species observed in the survey area during the 2023 biological resources surveys. A total of 60 plant taxa were observed in the survey area—33 (55 percent) were native and 27 (45 percent) were non-native. Of the 60 plants observed in the survey area, three species, California box-thorn (*Lycium californicum*), Nuttall's acmispon (*Acmispon prostratus)*, and southwestern spiny rush (*Juncus acutus*), are designated as sensitive. Sensitive plant species observed in the survey area are described in Section 5.4.

The native wetland and upland vegetation communities that provide suitable habitat for native and sensitive plant species are primarily limited to the western (seaward) edge of the survey area. The estuarine and southern coastal salt marsh communities limited to the eastern portion of the Ocean Beach – Dog Beach project site and survey area provide suitable habitat for aquatic plant species as well.

5.3.2 Wildlife Species

Appendix B lists all wildlife species detected in the survey area during the 2023 biological resources surveys. A total of 41 wildlife species were observed, including 29 birds, three mammals, two fish, and seven invertebrates. Of the 41 wildlife species observed in the survey area, seven species, Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), California brown pelican (*Pelecanus occidentalis californicus*), California sea lion (*Zalophus californianus*), Caspian tern (*Hydroprogne caspia*), double-crested cormorant (*Phalacrocorax auritus*), long-billed curlew (*Numenius americanus*), and monarch butterfly (*Danaus plexippus*), are designated as sensitive. Of these seven sensitive wildlife species, three (Belding's savannah sparrow, California brown pelican, and long-billed curlew) are MSCP SAP covered species. As previously stated in Section 5.3.1, Plant Species, no in-water surveys were performed during the 2023 survey efforts, and wildlife species that may occur in the subtidal and intertidal ocean areas were therefore not observed. Sensitive wildlife species observed in the survey area are described in Section 5.4.4, Sensitive Wildlife Species Observed.

Native habitat available within the survey area, including estuarine, southern coastal salt marsh, coastal sage scrub, coastal dune, open beach, as well as non-native habitat including non-native woodland and ornamental trees, provide foraging and nesting habitat for migratory and resident bird species. In addition, the non-native woodland, ornamental trees, coastal sage scrub, and other open areas are likely to provide foraging and roosting habitat for bats. Marine habitats, including southern coastal salt marsh, estuarine, open water, and tidepools, provide suitable habitat for marine mammal and marine and anadromous fish species. The coastal scrub and coastal dune in the northeastern portion of the Ocean Beach – Dog Beach project site and the disturbed habitat in the Sunset Cliffs project site provide cover and foraging opportunities for terrestrial reptiles and small mammals. The estuarine and southern coastal salt marsh communities, limited to the eastern portion of the Ocean Beach – Dog Beach project site and survey area, provides foraging and nesting habitat for birds as well as foraging habitat for anadromous fishes. High-quality native habitats that could support both common and sensitive wildlife species occur in the survey area. However, these habitats are limited mainly to the marine habitats in the western (seaward) edges of the survey area and are bordered by disturbed habitat and urban development.

5.4 Sensitive Species

Sensitive species are those recognized by federal, state, or local agencies as being potentially vulnerable to impacts because of rarity, local or regional reductions in population numbers,

isolation/restricted genetic flow, or other factors. Special-status plants include those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and CDFW; considered sensitive by the CDFW; included in the California Rare Plant Rank (CRPR) inventory maintained by the CNPS; listed as a MSCP SAP covered species; and/or defined by the City's Biology Guidelines and MSCP SAPas narrow endemic. Sensitive wildlife species include those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and CDFW; considered sensitive by the CDFW; California Watch List (WL); or MSCP SAP covered species. The MSCP SAP provides ASMDs for certain covered species to ensure their protection (City of San Diego 1997).

No focused sensitive plant or wildlife surveys were conducted by Harris within the survey area during the 2023 surveys. Sensitive plant and wildlife species incidentally observed during these 2023 surveys are included in the list of species observed and are discussed in this section.

As described in Section 4.1, Literature Review, distributions of historical sensitive species observations within 1 mile of the survey area were reviewed in preparation of this report. For the purposes of this biological resources assessment, those species that are known to occur or have some potential to occur within 1 mile of the survey area are addressed in this section. Locations of sensitive plant and wildlife species occurrences documented within 1 mile of the survey area, in and around Smiley Lagoon (within and adjacent to the Ocean Beach – Dog Beach project site), by City biologists during surveys conducted between 2006 and 2023 are also included and discussed in this section accordingly. The most recent City-documented sensitive species occurrences are noted in the discussions of each species as applicable. Sensitive plant species returned during CNPS querying with elevation ranges exceeding that of the survey area were excluded. The list of potentially occurring sensitive plant and wildlife species is provided in Table 4, Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area, and shown on Figure 8, Sensitive Species with Potential to Occur − Index, and Figures 8a through 8f, along with an assessment of their potential for occurrence in the survey area. It is important to note that the City-documented sensitive species data points shown on Figures 8 and 8a through 8f represent the presence of the species and not the number of individuals observed.

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Plants				
Abronia maritima	Red sand-verbena	None/None/4.2/None	Occurs in coastal dunes up to 330 feet amsl. Blooms Feb-Nov.	*High.* Disturbed sandy coastal dunes present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, Documented in the northern portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area (CDFW 2024b; Calflora 2024).
Acmispon prostratus	**Nuttall's acmispon**	**None/None/1B.1/—**	**Occurs in coastal dunes and sandy coastal scrub up to 35 feet amsl. Blooms Mar−Jun.**	***Present.* Observed in disturbed coastal sage scrub in the Ocean Beach – Dog Beach survey buffer (Figure 9, Sensitive Species Observed). Known historically in this general location and within 1 mile of the Mission Beach and Ocean Beach – Dog Beach project sites (Figures 8 and 8a; CDFW 2024b; Calflora 2024).**
Aphanisma blitoides	Aphanisma	None/None/1B.2/Covered	Succulent saline-adapted plant found in sand or scrub at the immediate coastline in coastal bluff scrub, coastal dunes, and coastal scrub habitats from 4 to 1,000 feet amsl. Blooms Feb−Jun.	*Moderate.* Disturbed sandy coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species (prior to 1940) within 1 mile of the La Jolla Shores and Pacific Beach – Tourmaline Surf Park project sites are likely extirpated. Species not known in the survey area (Figures 8, 8b, and 8c) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Adolphia californica	California adolphia	None/None/2B.1/—	Occurs in chaparral, coastal scrub, and valley and foothill grassland from 35 to 2,430 feet amsl. Blooms Dec−May.	*Not Expected.* Disturbed Diegan coastal sage scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Historical location of the species within 1 mile of the Pacific Beach – Tourmaline Surf Park project site, however, the point is not specific but mapped to the quad and therefore could be further away than 1 mile. Species not known in the survey area (Figures 8 and 8c) (CDFW 2024b; Calflora 2024).
Atriplex pacifica	South coast saltbush	None/None/1B.2/None	Occurs in coastal scrub, coastal bluff scrub, playas, and coastal dunes.	*Moderate.* Disturbed coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Species not known in or within 1 mile of the survey area (CDFW 2024b; Calflora 2024).
Bergerocactus emoryi	Golden-spined cereus	None/None/2B.2/—	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub in sandy soils from 10 to 1,295 feet amsl. Blooms May−Jun.	*Low.* Disturbed Diegan coastal sage scrub with sandy soils present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Not observed during survey. Historical locations of the species within 1 mile of the Sunset Cliffs project site, but not known in the survey area (Figures 8 and 8f) (CDFW 2024b; Calflora 2024).
Brodiaea orcuttii	Orcutt's brodiaea	None/None/1B.1/Covered	Occurs in closed-cone coniferous forest, chaparral, cismontane woodland, meadows, seeps, valley and foothill grasslands, and vernal pools in clay and mesic soils from 100 to 5,550 feet amsl. Blooms May−Jul.	*Not Expected.* Survey area out of elevation range for this species. Species not known in or within 1 mile of the survey area (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Ceanothus verrucosus	Wart-stemmed ceanothus	None/None/2B.2/Covered	Occurs in coastal scrub and chaparral from 5 to 1,245 feet amsl. Blooms Dec−May.	*Not Expected.* No suitable habitat present. Historical locations of the species within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites, but not known in the survey area (Figures 8, 8a, 8e, and 8f) (CDFW 2024b; Calflora 2024).
Chaenactis glabriuscula var. *orcuttiana*	Orcutt's pincushion	None/None/1B.1/—	Occurs in (sandy) coastal bluff scrub and coastal dunes up to 330 feet amsl. Blooms Jan−Aug.	*Low.* Disturbed sandy coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species (prior to 1940) within 1 mile of the Pacific Beach – Tourmaline Surf Park, Mission Beach, Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites are likely extirpated. Species not known in the survey area (Figures 8, 8a, and 8c through 8f) (CDFW 2024b; Calflora 2024).
Chorizanthe orcuttiana	Orcutt's spineflower	FE/SE/1B.1/—	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub in sandy openings from 10 to 410 feet amsl. Blooms Mar−May.	*Not expected.* Disturbed sandy coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical location of the species prior to 1910 within 1 mile of the Sunset Cliffs project site likely extirpated. Species not known in the survey area (Figures 8 and 8f) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Chloropyron maritimum ssp. *Maritimum*	Salt marsh bird's-beak	FE/SE/1B.2/Covered	Occurs in coastal dunes, and coastal salt marshes and swamps up to 100 feet amsl. Blooms May−Oct (Nov).	*High.* Coastal salt marsh, estuarine habitat, and disturbed sandy coastal dunes present only in eastern portion of the Ocean Beach – Dog Beach project site. However, the dune habitat is limited and highly disturbed. Known locations of species within the Ocean Beach – Dog Beach survey area (Figures 8 and 8a). Historical locations of the species within 1 mile of the Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier project sites (Figures 8, 8a, 8d, and 8e) (CDFW 2024b; Calflora 2024).
Corethrogyne filaginifolia var. *incana*	San Diego sand aster	None/None/1B.1/—	Occurs in coastal bluff, chaparral, and coastal scrub habitat from 10 to 375 feet amsl. Blooms Jun−Sep.	*Low.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Historical locations of species within 1 mile of the Pacific Beach – Tourmaline Surf Park, Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs, but not known in the survey area (Figures 8, 8a, 8c, 8e, and 8f) (CDFW 2024b; Calflora 2024). Most historical locations of the species prior to 1920 and likely extirpated.
Cylindropuntia (=opuntia) californica var. *californica*	Snake cholla	None/None/1B.1/Covered	Occurs in sandy soils in chaparral and coastal scrub at elevations below 1,000 feet amsl Blooms Apr−Jul.	*Low.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. No chaparral present. Species not observed during survey. Historical locations of the species within 1 mile of the Sunset Cliffs project site, but not known in the survey area (Figures 8 and 8f) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Dudleya brevifolia	Short-leaved dudleya	None/SE/1B.1/—	Occurs in maritime chaparral openings and coastal scrub from 100 to 820 feet amsl. Blooms Apr−May.	*Not Expected.* The survey area is below the documented range for this species. Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site and is likely a planted restoration area. Historical locations of the species within 1 mile of the La Jolla Shores and Pacific Beach – Tourmaline Surf Park project sites, but not known in the survey area (Figures 8, 8b, and 8c) (CDFW 2024b; Calflora 2024).
Dudleya blochmaniae ssp. blochmaniae	Blochman's dudleya	None/SE/1B.1/—	Occurs in coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland with clay or rocky soils from 15 to 1,475 feet amsl. Blooms Apr−Jun	*Not Expected.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, no suitable clay soils occur and habitat is likely a planted restoration area. Historical location of the species in the developed portion of the Pacific Beach – Tourmaline Surf Park project site and is likely extirpated (Figures 8 and 8c) (CDFW 2024b; Calflora 2024).
Dudleya variegata	Variegated dudleya	None/None/1B.2/Covered	Occurs in chaparral, coastal scrub, cismontane woodland, and valley and foothill grassland from 10 to 1,905 feet amsl. Blooms Apr−Jun.	*Low.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Species not known in the survey area (Figures 8 and 8a) (CDFW 2024b; Calflora 2024).
Dudleya viscida	Sticky dudleya	None/None/1B.2/Covered	Occurs in rocky portions of coastal bluff scrub, chaparral, cismontane woodland, and coastal scrub from 35 to 1,805 feet amsl. Blooms May−Jun.	*Not Expected.* No suitable rocky coastal scrub present in the survey area. Species not observed during the survey. Historical locations of the species within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites, but not known in the survey area (Figures 8, 8a, 8e, and 8f) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Erysimum ammophilum	Coast wallflower	None/None/1B.2/Covered	Occurs in sandy openings of maritime chaparral, coastal dune, and coastal scrub up to 195 feet amsl. Blooms Feb−Jun (Aug).	*Moderate.* Disturbed sandy coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites (Figures 8, 8a, 8e, and 8f) (CDFW 2024b; Calflora 2024). One historical location of the species in the northern portion of the Sunset Cliffs project site, but the year is unknown and no suitable habitat in that area.
Euphorbia misera	Cliff spurge	None/None/2B.2/—	Occurs in rocky portions of coastal bluff scrub, coastal scrub, and Mojavean desert scrub from 35 to 1,640 feet amsl. Blooms Dec−Aug (Oct).	*Not Expected.* No suitable rocky coastal scrub present in the survey area. Historical location of the species within 1 mile of the La Jolla Shores project site, but not known in the survey area (Figures 8 and 8b) (CDFW 2024b; Calflora 2024).
Ferocactus viridescens	San Diego barrel cactus	None/None/2B.1/Covered	Occurs in rocky and sandy chaparral, coastal scrub, valley, and foothill grassland habitats from 10 to 1,475 feet amsl. Blooms May−Jun.	*Moderate.* Disturbed sandy coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the La Jolla Shores project site, but not known in the survey area (Figures 8 and 8b) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Heterotheca sessiliflora ssp. *sessiliflora*	Beach goldenaster	None/None/1B.1/Covered	Occurs in coastal chaparral, coastal dunes, and coastal scrub up to 4,020 feet amsl. Blooms Mar−Dec.	*Not Expected.* Disturbed coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the Mission Beach, Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites, but only prior to 1935. Locations likely extirpated. Species not known in the survey area (Figures 8 and 8c through 8f) (CDFW 2024b; Calflora 2024).
Isocoma menziesii var. *decumbens*	Decumbent goldenbush	None/None/1B.2/—	Occurs in chaparral and (often sandy or disturbed) coastal scrub habitats from 35 to 445 feet amsl. Blooms Apr−Nov.	*Moderate.* Disturbed sandy coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Historical location of the species within 1 mile of the La Jolla Shores and Mission Beach project sites, but not known in the survey area (Figures 8, 8b, and 8d) (CDFW 2024b; Calflora 2024).
Iva hayesiana	San Diego marsh-elder	None/None/2B.2/—	Occurs in wetlands, marshes, floodplains/terraces, swamps, and playas up to 1,640 feet amsl. Sometimes found in non-wetland areas. Blooms Apr−Oct.	*Moderate.* Suitable marsh and estuarine habitats present only in the eastern portion of the Ocean Beach – Dog Beach project site. Historical location of the species within 1 mile of the Sunset Cliffs project site but not known in the survey area (Figures 8 and 8f) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Juncus acutus* ssp. *leopoldii	**Southwestern spiny rush**	**None/None/4.2/—**	**Occurs in mesic coastal dunes, alkaline seeps, meadows, and coastal salt marshes and swamps from 10 to 2,955 feet amsl. Blooms (Mar) May-Jun.**	***Present.* Individuals observed in the disturbed coastal scrub at the edge of the southern coastal salt marsh in the eastern portion of the Ocean Beach – Dog Beach project site (Figure 9). No other individuals were observed in the remainder of the survey area. Documented in the western portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations for this species occur in the survey area.**
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	None/None/1B.1/—	Occurs in coastal salt marshes and swamps, playas, and vernal pools from 5 to 4,005 feet amsl. Blooms Feb-Jun.	*Moderate.* Salt marsh and estuarine habitat present only in the eastern portion of the Ocean Beach – Dog Beach project site. Historical location of the species within 1 mile of the Mission Beach project site, but only prior to 1939 (Figures 8 and 8d). Location likely extirpated. Species not known in the survey area (CDFW 2024b; Calflora 2024).
Lepidium virginicum var. *robinsonii*	Robinson's peppergrass	None/None/4.3/—	Occurs in chaparral and coastal scrub bluff habitats from 5 to 2,905 feet amsl. Blooms Jan−Jul.	*Low.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Historical location of the species within 1 mile of the La Jolla Shores project site, but not known in the survey area (Figures 8 and 8b) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Leptosyne maritima	Sea dahlia	None/None/2B.2/—	Occurs in coastal bluff scrub and coastal scrub habitats 15 to 490 feet amsl. Blooms Mar−May.	*Not Expected.* Disturbed coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the La Jolla Shores and Pacific Beach – Tourmaline Surf Park project sites, but not known in the survey area (Figures 8, 8b, and 8c) (CDFW 2024b; Calflora 2024).
Lycium californicum	**California box-thorn**	**None/None/4.2/—**	**Blooms Mar−Aug (Dec). Occurs in coastal bluff scrub or coastal scrub habitats 15 to 490 feet amsl.**	***Present.* Observed on the sandstone cliffs in the southern portion of the Sunset Cliffs project site (Figure 9). No other individuals were observed in the remainder of the survey area. Documented in the western portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations for this species occur in the survey area.**
Nemacaulis denudata var. *denudata*	Coast woolly-heads	None/None/1B.2/—	Occurs in coastal dune habitats up to 330 feet amsl. Blooms Apr−Sep.	*High.* Disturbed coastal dunes present only in eastern portion of the Ocean Beach – Dog Beach project site. Species known within the Ocean Beach – Dog Beach survey area (Calflora 2024). Documented in the western portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). Historical locations of the species within 1 mile of the Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier project sites (Figures 8, 8a, 8d, and 8e) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Nemacaulis denudata var. *gracilis*	Slender cottonheads	None/None/2B.2/—	Occurs in coastal dune, desert dune, and Sonoran desert scrub habitats up to 1,310 feet amsl. Blooms Mar−May.	*Low.* Disturbed coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the Ocean Beach – Dog Beach project site but not known in the survey area (Figures 8 and 8a) (CDFW 2024b; Calflora 2024).
Phacelia stellaris	Brand's star phacelia	None/None/1B.1/—	Occurs in coastal dune and scrub habitats between 5 and 1,310 feet amsl. Blooms May–Jun.	*Low.* Disturbed coastal dunes and scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. However, dunes limited and highly disturbed, and coastal scrub is likely a planted restoration area. Historical locations of the species within 1 mile of the Mission Beach project site, but only prior to 1935 (Figures 8 and 8d). Location likely extirpated. Species not known in the survey area (CDFW 2024b, Calflora 2024).
Quercus dumosa	Nuttall's scrub oak	None/None/1B.1/—	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub in sandy, clay, and loam soils from 50 to 1,310 feet amsl. Blooms Feb−Apr (May).	*Low.* Disturbed sandy coastal scrub is present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Not observed during survey. Historical location of the species within 1 mile of the La Jolla Shores project site but not known in the survey area (Figures 8 and 8b) (CDFW 2024b; Calflora 2024).
Senecio aphanactis	Chaparral ragwort	None/None/2B.2/—	Occurs in chaparral, cismontane woodland, and coastal scrub from 50 to 2,625 feet amsl. Blooms Jan−Apr (May).	*Low.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, it is likely a planted restoration area. Historical location of the species within 1 mile of the Pacific Beach – Tourmaline Surf Park project site, but not known in the survey area (Figures 8 and 8c) (CDFW 2024b; Calflora 2024).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Suaeda esteroa	Estuary seablite	None/None/1B.2/—	Occurs in coastal salt marshes and swamps up to 15 feet amsl. Blooms (Jan−May) Jul−Oct.	*High.* Coastal salt marsh and estuarine habitat present only in the eastern portion of the Ocean Beach – Dog Beach project site. Documented in the northern portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). Historical location of the species within 1 mile of the Ocean Beach – Dog Beach project site, but not known in the survey area (Figures 8 and 8a) (CDFW 2024b; Calflora 2024).
Wildlife				
Invertebrates				
Danaus plexippus	**Monarch butterfly[1] (California overwintering population)**	**FC/None/—/—**	**Occurs in a variety of habitats where patches of milkweed (*Asclepias* sp.), the monarch caterpillar host plant, are present. Overwinters in eucalyptus, pine, and cypress trees.**	***Present.* Observed flying through eastern portion of the Ocean Beach – Dog Beach project site (Figure 9). Large number of mature eucalyptus and pine trees in the survey area suitable for overwintering habitat. No milkweed patches were observed during the survey in the survey area suitable host plants for monarch butterfly caterpillars to occupy. Historical locations approximately 0.9 mile northeast of the La Jolla Shores project site, but not in the survey area (Figures 8 and 8b) (CDFW 2024b; USFWS 2024b).**
Panoquina errans	Wandering skipper	None/None/—/Covered	Occurs on coastlines in Southern California and Baja California, Mexico. Typically found in salt marshes and on adjacent ocean bluffs and other open areas near the ocean.	*High.* Suitable salt marsh habitat occurs only in the survey area east of the Ocean Beach – Dog Beach project site. Documented in and adjacent to Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). Other historical locations within region, but not in the survey area (CDFW 2024b; USFWS 2024b).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Amphibians				
Spea hammondii	Western spadefoot	FC/SSC/—/—	Occurs primarily in grasslands or open areas in coastal sage scrub with vernal pools or similar shallow, temporary pools for breeding.	*Not Expected.* No suitable vernal pool or temporary pooled habitat occurs in the survey area. One historical location of the species approximately 0.75 mile east from the Sunset Cliffs project site (Figures 8 and 8f) (CDFW 2024b; USFWS 2024b).
Reptiles				
Anniella stebbinsi	San Diegan legless lizard	None/SSC/—/—	Occurs in open grassland and scrub habitats.	*Moderate.* Disturbed coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, highly disturbed. Historical locations of the species within 1 mile of all six project sites, but not in the survey area (Figures 8 and 8a through 8f) (CDFW 2024b; USFWS 2024b).
Arizona elegans occidentalis	California glossy snake	None/SSC/—/—	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Prefers microhabitats of open areas with friable (burrowing) soils.	*Not Expected.* No suitable habitat present within survey area. Historical locations of the species exist within 1 mile of the Pacific Beach – Tourmaline Surf Park project site but are not known in the survey area (Figures 8 and 8c) (CDFW 2024b; USFWS 2024b).
Aspidoscelis hyperythra beldingi	Belding's orange-throated whiptail	None/WL/—/Covered	Occurs in coastal sage scrub, chaparral, edges of riparian woodlands, and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant insect prey base, particularly termites (*Reticulitermes* sp.).	*Moderate.* Disturbed sandy coastal scrub with weedy areas surrounding present only in eastern portion of the Ocean Beach – Dog Beach project site. No termites observed for food source. Historical locations of the species within 1 mile of the Pacific Beach – Tourmaline Surf Park project site, but not in the survey area (Figures 8 and 8c) (CDFW 2024b; USFWS 2024b).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Crotalus ruber	Red-diamond rattlesnake	None/SSC/—/—	Inhabits coastal chaparral, oak and pine woodlands, arid scrub, rocky grasslands, and cultivated areas. Found on the desert slopes of mountains and in rocky desert flats. Requires shaded areas for cover.	*Not Expected.* No suitable habitat present. Historical locations of the species within 1 mile of the Pacific Beach – Tourmaline Surf Park and Mission Beach project sites, but not in the survey area (Figures 8, 8c, and 8d) (CDFW 2024b; USFWS 2024b).
Phrynosoma blainvillii	Blainville's horned lizard	None/SSC/—/—	Occurs in open areas of sandy soil and low vegetation in foothills, valleys, and semiarid mountains in grasslands coniferous forests, woodlands, and chaparral. Also found in lowlands within sandy washes with scattered shrubs and long dirt roads.	*Low.* Disturbed sandy coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, highly disturbed. Historical locations of the species within 1 mile of the La Jolla Shores project site, but not in the survey area (Figures 8 and 8b) (CDFW 2024b; USFWS 2024b).
Birds				
Accipiter cooperii	Cooper's hawk	None/WL/—/Covered	Occurs where stands of trees are present, including oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests.	*High Foraging. High Nesting.* Suitable foraging habitat and trees suitable for nesting present throughout the survey area. Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). Other historical locations within region but not in the survey area (CDFW 2024b; USFWS 2024b).
Calypte costae (nesting)	Costa's hummingbird	BCC/None/—/None	Occurs in desert scrub in the Sonoran and Mojave Deserts, and riparian, chaparral and sage scrub areas on the coast.	*High Foraging. Moderate Nesting.* Suitable foraging and nesting habitats are limited to the coastal scrub in eastern portion of the Ocean Beach – Dog Beach project site; however, highly disturbed. Documented south of Smiley Lagoon during 2022 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Charadrius alexandrinus nivosus (nesting)	Western snowy plover	FT/SSC/—/Covered	Nests on coasts in open sandy dunes with little to no vegetation, or barren or sparsely vegetated flats near saline or alkaline lakes, reservoirs, and ponds.	*Low Foraging. Not Expected Nesting.* Suitable sandy habitat for foraging present. Known breeding populations occur to the north in lagoons or to the south in Coronado, but not within 1 mile of the survey area. Historical locations within region but not in the survey area (CDFW 2024b; USFWS 2024b).
Chlidonias niger (nesting colony)	Black tern	None/SSC/—/None	Nests semi-colonially in freshwater marshes in northeastern California and in rice fields in the Central Valley.	*High Foraging. Not Expected Nesting.* High potential for to forage along coastline in the survey area, particularly in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Not known to nest in coastal San Diego County Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.
Circus cyaneus hudsonius	Northern harrier	None/SSC/—/Covered	Occurs primarily in grasslands, agricultural fields, and other open habitats. Also known to forage and nest in open wetlands, marshes, meadows, wet lightly grazed pastures, old fields, and freshwater and brackish marshes.	*High Foraging. Low Nesting.* High potential for to forage in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Nesting is more limited due to dense human presence in and surrounding the survey area. Documented south of Smiley Lagoon during 2019 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.
Egretta rufescens	Reddish egret	None/None/—/Covered	Occurs in coastal wetlands and lagoons of San Diego County as a non-breeding visitor. Not known to nest in San Diego County.	*High Foraging. Not Expected Nesting.* High potential for to forage along coastline in the survey area, particularly in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. No established nesting sites in or within 1 mile of the survey area. Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Falco peregrinus anatum	American peregrine falcon	None/FDL/None/Covered	Occurs in open landscapes with cliffs (or skyscrapers) for nest sites, as well as along rivers and coastlines or in cities.	*High Foraging. Not Expected Nesting.* High potential for to forage along coastline in the survey area, particularly in the estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. No cliffs or tall buildings suitable for nesting. Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.
Hydroprogne caspia	**Caspian tern**	**None/None/—/—**	**Occurs in coastal San Diego County as a summer visitor, with the salt works in south San Diego Bay being the only major colony site since the 1940s. Range widely along the coast and inland lakes for foraging.**	***Present.* Observed during the 2023 surveys foraging along the coast in the Sunset Cliffs project site (Figure 9). High potential exists for it to forage along the coast within the survey area. Not expected to be nesting in the survey area.**
***Numenius americanus* (nesting)**	**Long-billed curlew**	**None/WL/—/** Covered	**Found in tidal mudflats, open flooded grassland, shallow freshwater margins, and wet meadows during migration and winter (only) in San Diego County.**	***Present.* Observed during the 2023 surveys foraging along the shoreline in the Sunset Cliffs project site (Figure 9). High potential exists for it to forage along the shoreline within the survey area. Not expected to be nesting in the survey area.**
Pandion haliaetus	Osprey	None/WL/—/None	Nests on human-made structures, rarely trees in San Diego County. Found near open waters both marine and freshwater to forage for fish.	*High Foraging. High Nesting.* High potential to forage within open water along coastline in the survey area, particularly in the open water and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. High potential to be observed nesting on light poles and other structures in the survey area. Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Passerculus sandwichensis beldingi	**Belding's savannah sparrow**	**BCC/SE/—/Covered**	**Occurs in coastal marshes dominated by pickleweed (*Salicornia* sp.).**	***Present.* Observed foraging in the eastern edge of the Ocean Beach – Dog Beach survey area (Figure 9). Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). High potential to be found nesting and foraging with the pickleweed throughout the southern coastal salt marsh and estuarine habitat of Smiley Lagoon.**
Pelecanus occidentalis californicus	**California brown pelican**	**None/FP/—/Covered**	**Occurs along San Diego County's coast and nearby ocean during winter and migration. Some non-breeding individuals found during spring. Only long-term breeding colonies occur on Anacapa and Santa Barbara Islands.**	***Present.* Observed during 2023 surveys flying along the coast in the survey area (Figure 9). Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). High potential for it to forage along the coast near the survey area. Not expected to be nesting in the survey area.**
***Phalacrocorax auritus* (nesting colony)**	**Double-crested cormorant**	**None/WL/—/—**	**Non-breeding visitor on salt and freshwater within San Diego County. Nests on the ground, on cliff edges, trees, shrubs and in artificial surfaces on and near Channel Islands and coast lines and lakes elsewhere in the U.S.**	***Present.* Observed during 2023 surveys foraging in the ocean and sunning on rock outcroppings to the west of the survey area (Figure 9). Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). High potential exists for it to forage along the coast within the survey area. Not expected to be nesting in the survey area.**
Polioptila californica	Coastal California gnatcatcher	FT/SSC/—/Covered	Nests within coastal sage scrub dominated by California sagebrush and flat-top buckwheat along the coast (avoiding nesting in those dominated by black and white sage, lemonadeberry and laurel sumac). Inland, can be found in sage scrub-grassland or chaparral habitat interface.	*Not Expected Foraging. Not Expected Nesting.* No suitable habitat available within the survey area. Historical locations of the species known within 1 mile of the La Jolla Shores, Pacific Beach – Tourmaline Surf Park, and Sunset Cliffs project sites but not in the survey area (Figures 8, 8b, 8c, and 8f) (CDFW 2024b; USFWS 2024b).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Rallus obsoletus levipes	Light-footed Ridgway's rail	FE, FP/SE/—/Covered	Occurs in coastal wetlands, brackish areas, coastal saline emergent wetlands with cordgrass (*Spartina* sp.) as the dominant vegetative cover.	*High Foraging. Not Expected Nesting.* Coastal estuarine habitat limited to the eastern portion of the Ocean Beach – Dog Beach project site; however, no cordgrass preferred by the species is present. No suitable nesting habitat or known nesting sites within the survey area. Documented in the eastern portion of Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area (CDFW 2024b; USFWS 2024b).
Sternula antillarum browni (nesting colony)	California least tern	FE, FP/SE/—/Covered	Nests on open sandy dunes and flats lacking vegetation in colonies along California coastlines, in lagoons, bays, and estuaries.	*High Foraging. Not Expected Nesting.* High potential for to forage along coastline in the survey area, particularly in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Not expected for nesting within the survey area. No established colonies located in the survey area. The open dune and flat areas protected from tides has continuous high human disturbance within the survey area. Historical locations of the species within 1 mile of the Mission Beach, Ocean Beach – Dog Beach, and Ocean Beach – Pier project sites but not in the survey area (Figures 8, 8a, 8d, and 8e) (CDFW 2024b; USFWS 2024b).
Thalasseus elegans (nesting colony)	Elegant tern	BCC/WL/—/Covered	Nests on Isla Rasa in the Gulf of California and Salt Works in south San Diego Bay (Unitt 2014). Forages over the open ocean.	*High Foraging. Not Expected Nesting.* High potential for to forage along coastline in the survey area, particularly in the estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Established colonies located elsewhere, and open dune and flat areas protected from tides is limited within the survey area. Documented in and surrounding Smiley Lagoon during 2023 City surveys (Figures 8 and 8a). No other historical locations within 1 mile of the survey area.

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Mammals				
Chaetodipus fallax	Northwestern San Diego pocket mouse	None/SSC/—/—	Found in Southern California to central Baja California within sandy, herbaceous areas in coastal sage scrub habitats and grasslands.	*Moderate.* Disturbed sandy coastal scrub present only in eastern portion of the Ocean Beach – Dog Beach project site, however, highly disturbed. Historical location of the species within 1 mile of the Sunset Cliffs project site but not in the survey area (Figures 8 and 8f) (CDFW 2024b; USFWS 2024b).
Choeronycteris mexicana	Mexican long-tongued bat	None/SSC/—/—	Roosts in caves, mines, rock crevices, under exposed tree roots, and in buildings in San Diego County during migration (some may overwinter).	*High Roosting; High Foraging.* An abundance of ornamental plants can be found within the eastern portions of the survey area, especially in the urban areas for foraging in migration and winter. Roosts are available in the commercial and residential structures throughout the survey area. Historical locations of the species within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites but not in the survey area (Figures 8, 8a, 8e, and 8f) (CDFW 2024b; USFWS 2024b).
Nyctinomops macrotis	Big free-tailed bat	None/SSC/—/—	Roosts in steep, rocky cliff faces, rocky outcrops, and abandoned quarries. Has been found on several occasions roosting high in or on tall structures in Balboa Park and La Jolla.	*Not Expected.* No suitable habitat within the survey area. No colonies occur within San Diego County. Migrants may be found on tall buildings outside the CRMP Phase 1 area. Historical location from 1970 when an individual was found in an apartment in Mission Beach (CDFW 2024a). Historical locations within 1 mile of the Mission Beach project site but not in the survey area (Figures 8 and 8d) (CDFW 2024b; USFWS 2024b).
Taxidea taxus	American badger	None/SSC/—/Covered	Occurs in open plains and prairies, farmland, and occasionally edges of woodlands.	*Not Expected*. No suitable habitat occurs in the survey area. Historical locations of the species within 1 mile of the La Jolla Shores project site but not in the survey area (Figures 8 and 8b) (CDFW 2024b; USFWS 2024b).

Table 4. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/MSCP SAP	Habitat	Potential to Occur
Zalophus californianus	**California sea lion**	**MMPA/None/—/—**	**Occurs throughout the bays and offshore throughout San Diego County. The nearest rookery is at Los Coronados Islands off Tijuana.**	***Present.* Observed during the 2023 surveys swimming in the Pacific Ocean southwest of the Sunset Cliffs project site (Figure 9). High potential to forage in the water along the coast within the survey area. High potential for the species to be utilizing the beaches within the survey area as haul-out locations, but no known rookery within the survey area.**

Notes: amsl = above mean sea level; FC = federal candidate; FDL = federally delisted; FP = federally protected; FE = federally endangered; FT = federally threatened; Covered = City of San Diego MSCP SAP covered species; SE = state endangered; MMPA = Marine Mammal Protection Act; None = No status indicated for species; SE = state endangered; SSC = state species of special concern; WL = state watch list species

CNPS CRPR Rare Plant Ranking: 1B = rare, threatened, or endangered in California and elsewhere; 2B = rare, threatened, or endangered in California but more common elsewhere; 3 = a watch list of species about which more information is needed; 4 = a watch list of species of limited distribution

Threat Ranks: .1 = seriously threatened; .2 = moderately threatened

Two sensitive plant species and five sensitive wildlife species were observed in the survey area during the 2023 surveys (Figure 9, Sensitive Species Observed). No sensitive species were observed in the survey area of the La Jolla Shores project site and is therefore not included in Figure 9. As previously mentioned, no focused or protocol species surveys were conducted in 2023. Sensitive plant and wildlife species that were observed or have a high potential to occur in the survey area are described in detail in Sections 5.4.2 through 5.4.5.

5.4.1 Critical Habitat

The potential presence of critical habitat on the survey area was also analyzed. No critical habitat for sensitive plant or wildlife species occurs in or within 5 miles of the survey area (CDFW 2024a, 2024b; SanGIS 2024; USFWS 2024b).

5.4.2 Sensitive Plant Species Observed

Three sensitive plant species, California box-thorn, Nuttall's acmispon, and southwestern spiny rush, were observed in the survey area, specifically in the Sunset Cliffs and Ocean Beach – Dog Beach project sites, during the biological surveys (Figure 9). These three species are not covered under the MSCP SAP. These sensitive plant species observed in the survey area are described in the following subsection.

5.4.2.1 California Box-Thorn (*Lycium californicum*), CRPR 4.2

California box-thorn, an endemic California shrub, is a CRPR 4.2 species (CNPS 2024). California box-thorn is sprawling shrub found in coastal bluff scrub and coastal scrub communities at elevations between 15 feet and 490 feet amsl. This slightly thorny shrub has thick, fleshy, bulbous green leaves and bell-shaped white flowers with purple streaks or spots. It bears bright red shiny berries that are 3 to 6 millimeters in diameter. This species' bloom period is between March and August. Threats to this species include habitat loss, coastal erosion, trampling, and climate change.

One large patch of California box-thorn was observed on the sandstone cliffs along the walking path in the southern portion of the Sunset Cliffs project site (Figure 9). The California box-thorn shrubs observed on the Sunset Cliffs project site were surrounded primarily by non-native ice plant (*Carpobrotus edulis*) and other non-native grasses and weeds growing in the sandstone cliffs. This species was also documented in the western portion of Smiley Lagoon during City biological resources surveys conducted in 2023. Although these individuals were not observed during the 2023 Harris surveys, California box-thorn was determined to have a high potential to occur in the Ocean Beach – Dog Beach survey area (Figures 8 and 8a). It should be noted that the survey area for the City biological resources surveys conducted in 2023 covered more area within Smiley Lagoon than the Ocean Beach – Dog Beach survey area. No other California box-thorn individuals or patches were observed in the survey area during the 2023 Harris surveys.

5.4.2.2 Nuttall's Acmispon (*Acmispon prostratus*) CRPR 1B.1

Nuttall's acmispon, an annual herb, is a CRPR 1B.1 species (CNPS 2024; City of San Diego 1997). Nuttall's acmispon is found in coastal dune and open, sandy coastal scrub communities at sea level up to 35 feet amsl. This low sprawling plant has small, showy flowers with bright yellow petals streaked and spotted with red. This species' bloom period is between March and June. Threats to this species include habitat loss and degradation, trampling, and climate change.

Nuttall's acmispon was observed in the disturbed coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach survey area (Figure 9). This species was also documented in the western portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). The disturbed coastal sage scrub in the Ocean Beach – Dog Beach project site is likely a planted restoration area, and the Nuttall's acmispon that was observed in that habitat could have been part of the planting palette and not naturally occurring. No other Nuttall's acmispon was observed in the survey area during the 2023 Harris surveys.

5.4.2.3 Southwestern Spiny Rush (*Juncus acutus* ssp. *leopoldii*), CRPR 4.2

Southwestern spiny rush is a sharp-pointed rush (monocot) and a CRPR 4.2 species (CNPS 2024). Southwestern spiny rush occurs in coastal dunes with mesic soils, meadows and alkaline seeps, coastal saltwater marshes, and swamps at elevations between 10 and 2,955 feet amsl. The stems of this plant emerge from a central cluster and have sharp, terminal spines. This species can grow to be almost 1.5 meters tall and appears "tussocky" and brown and green. Southwestern spiny rush blooms May through June.

Seven southwestern spiny rush individuals were observed in the disturbed Diegan coastal sage scrub at the edge of the southern coastal salt marsh in the eastern portion of the Ocean Beach – Dog Beach project site during the August 2023 survey conducted by Harris (Figure 9). This species was also documented in the western portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). As previously discussed, the disturbed coastal sage scrub in the Ocean Beach – Dog Beach project site is likely a planted restoration area, and the southwestern spiny rush that was observed in that habitat could have been part of the planting palette and not naturally occurring. No other southwestern spiny rush was observed in the survey area during the 2023 Harris surveys.

5.4.3 Sensitive Plant Species Not Observed With a Moderate or High Potential to Occur

Based on the literature and database review, a total of 31 sensitive plant species were considered for potential to occur in the survey area but were not observed during the biological resources surveys (Table 4). Of this total, 11 species, Aphanisma (*Aphanisma blitoides*), coast wallflower (*Erysimum ammophilum*), coast woolly-heads (*Nemacaulis denudata* var. *denudata),* Coulter's

goldfields (*Lasthenia glabrata* ssp. *coulteri*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), estuary seablite (*Suaeda esteroa*), red-sand verbena (*Abronia maritima*), San Diego barrel cactus (*Ferocactus viridescens),* San Diego marsh-elder (*Iva hayesiana*), south coast saltbush (*Atriplex pacifica*), and salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*), were determined to have a moderate or high potential to occur in the survey area but were not observed during the biological resources surveys. Of these species, Aphanisma, coast wallflower, salt marsh bird's-beak, and San Diego barrel cactus are covered under the MSCP SAP. San Diego barrel cactus and salt marsh bird's-beak have ASMDs but are not designated as narrow endemic species (City of San Diego 1997). The 11 sensitive plant species with a moderate or high potential to occur in the survey area are described in the following subsections.

5.4.3.1 Aphanisma (*Aphanisma blitoides*), CRPR 1B.2, MSCP SAP Covered

Aphanisma is a CRPR 1B.2 and MSCP SAP covered species. Aphanisma is a succulent saline-adapted annual herb that occurs in sand or scrub at the immediate coastline in coastal bluff scrub, coastal dunes, and coastal scrub habitats at elevations between 4 and 1,000 feet amsl. This species has many thin, sprawling stems, few reduced green leaves, and tiny flowers which bloom from February through June. Threats to this species include loss of habitat and non-native herbivores.

Suitable habitat for Aphanisma is present only in the disturbed sandy coastal dunes and Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site. This species was documented prior to 1940 within 1 mile of the La Jolla Shores and Pacific Beach – Tourmaline Surf Park project sites, however, these locations are likely extirpated (Figures 8, 8b, and 8c) (CDFW 2024b; Calflora 2024). No other records of Aphanisma have been documented in the survey area. Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

The MSCP SAP does not include ASMDs for Aphanisma (City of San Diego 1997).

5.4.3.2 Coast Wallflower (*Erysimum ammophilum*), CRPR 1B.2, MSCP SAP Covered

Coast wallflower, a CRPR 1B.2 and MSCP SAP covered species, occurs in sandy openings of maritime chaparral, coastal dune, and coastal scrub at elevations up to 195 feet amsl. This perennial herb has long, narrow and dark-green leaves with bright yellow flowers with rounded petals, which bloom between February and June, and sometimes into August. Threats to coast wallflower include loss of habitat, trampling, and invasion of non-native plants. Suitable habitat for coast wallflower is present only in the disturbed sandy coastal dunes and Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites (Figures 8, 8a, 8e, and 8f) (CDFW 2024b; Calflora 2024). One historical location of coast

wallflower was documented in the northern portion of the Sunset Cliffs project site, but the year is unknown and no suitable habitat is present in that area. Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

The MSCP SAP does not include ASMDs for Coast wallflower (City of San Diego 1997).

5.4.3.3 Coast Woolly-Heads (*Nemacaulis denudata* var. *denudata*), CRPR 1B.2

Coast woolly-heads is a CRPR 1B.2 species. Coast woolly-heads occurs in coastal dunes from sea level up to 330 feet amsl. This species is a low-growing plant with small spoon-shaped, crinkled, hairy gray leaves growing from a central taproot. Coast woolly-heads flowers are long, smooth, thread-like stems growing horizontally along the sand and bloom from April through September. Threats to this species include habitat loss, trampling, and climate change.

Suitable habitat for coast woolly-heads is present only in the disturbed sandy coastal dunes in the eastern portion of the Ocean Beach – Dog Beach project site. A known location for this species occurs within the Ocean Beach – Dog Beach survey area, as well as other historical locations within 1 mile of the Ocean Beach – Dog Beach and Ocean Beach – Pier project sites (Figures 8, 8a, and 8e) (CDFW 2024b, Calflora 2024). Coast woolly-heads is documented in the western portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

5.4.3.4 Coulter's Goldfields (*Lasthenia glabrata* ssp. *coulteri*), CRPR 1B.1

Coulter's goldfields, a CRPR 1B.1 species, is an annual herb that occurs in coastal salt marshes and swamps, playas, and vernal pools at elevations between 5 and 4,005 feet amsl. This species, which can grow up to two feet tall, has a stem that is simple or branching from which yellow solitary or loosely clustered flower heads bloom between February and June. Threats to this species include habitat loss from urban and agricultural development.

Suitable habitat for Coulter's goldfields is present only in the coastal salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within 1 mile of the Mission Beach project site, but only prior to 1939 and are likely extirpated (Figures 8 and 8d) (CDFW 2024b; Calflora 2024). No other records of Coulter's goldfields have been documented in the survey area. Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

5.4.3.5 Decumbent Goldenbush (*Isocoma menziesii* var. *decumbens*), CRPR 1B.2

Decumbent goldenbush is a CRPR 1B.2 species. This species is a low-growing perennial subshrub with hairy leaves and stems and very small yellow flowers. Decumbent goldenbush is typically found in sandy soils in chaparral, coastal scrub, hillsides, arroyos, and on the landward side of dunes, at elevations between 25 and 820 feet amsl. This species blooms from April to November. Threats to this species include waterway channelization, coastal development, vehicles, and non-native plant introduction.

Suitable habitat for decumbent goldenbush is present only in the sandy Diegan coastal sage scrub present only in eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within 1 mile of the La Jolla Shores and Mission Beach project sites, but not in the survey area (Figures 8, 8b, and 8d) (CDFW 2024b; Calflora 2024). Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

5.4.3.6 Estuary Seablite (*Suaeda esteroa*), CRPR 1B.2

Estuary seablite is a CRPR 1B.2 species. Estuary seablite occurs in coastal salt marshes and swamps from sea level up to 15 feet amsl. It is a yellow-green to reddish subshrub with fleshy, succulent leaves and typically blooms from July through October but is known to bloom as early as January through May. Threats to this species include habitat loss and climate change.

Suitable habitat for estuary seablite is present only in the coastal salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within 1 mile of the Ocean Beach – Dog Beach project site but not in the survey area (Figures 8 and 8a) (CDFW 2024b). Estuary seablite was documented in the northern portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). An unidentified species of *Suaeda* was observed in the eastern portion of the Ocean Beach – Dog Beach project site during the August 2023 survey.

5.4.3.7 Red Sand-Verbena (*Abronia maritima)*, CRPR 4.2

Red sand-verbena is a CRPR 4.2 species that occurs in coastal dunes in southern California and northern Baja California up to 330 feet amsl. This plant has bright red to pink or purple clustered flowers that bloom between January and November, and its succulent leaves form a trailing mat. Threats to red sand-verbena include habitat loss and degradation primarily resulting from coastal development.

Suitable habitat for red sand-verbena is present only in the disturbed sandy coastal dunes in the eastern portion of the Ocean Beach – Dog Beach project site. This species was documented in the northern portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the surveys conducted during

this species' blooming period, no focused rare plant survey was conducted, and it has a high potential to occur in the Ocean Beach – Dog Beach survey area. Besides the City-documented observances, no other historical locations occur within 1 mile of the survey area.

5.4.3.8 Salt Marsh Bird's-Beak (*Chloropyron maritimum* ssp. *maritimum*), FE, SE, 1B.2, MSCP SAP Covered

Salt marsh bird's-beak is a federally and state-endangered, CRPR 1B.2, and MSCP SAP covered species. Salt marsh bird's-beak occurs in coastal dunes and coastal salt marshes and swamps up to 100 feet amsl. It is a small leafy plant that has purple stems, produces white flowers with yellow tips, and typically blooms from May through October but is known to bloom as late as November. Threats to this species include habitat loss, trampling, invasion of non-native plants, and climate change.

Suitable habitat for salt marsh bird's-beak is present only in the southern coastal salt marsh, estuarine habitat, and disturbed sandy coastal dunes in the eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within the Ocean Beach – Dog Beach survey area and within 1 mile of the Ocean Beach – Dog Beach and Ocean Beach – Pier project sites (Figures 8, 8a, and 8e) (CDFW 2024b; Calflora 2024). Salt marsh bird's-beak was documented in the northern portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the surveys, no focused rare plant survey was conducted during this species blooming period, and it could be present in the survey area.

ASMDs under the MSCP SAP for salt marsh bird's-beak in the CRMP Phase 1 area include implementing measures to reduce threats and stabilize populations (relocation of footpaths, establishment of buffer areas), addressing opportunities for reintroduction, and implementing measures to enhance existing populations (protect and improve upland habitat for pollinators). In addition, there is a federal recovery plan for @@this species, and management activities should, to the extent possible, help achieve the specified goals. As required by the ASMDs for salt marsh bird's-beak, any newly found populations shall be evaluated for inclusion in the preserve strategy through acquisition (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.3.9 San Diego Barrel Cactus (Ferocactus viridescens), CRPR 2B.1, MSCP SAP Covered

San Diego barrel cactus is a CRPR 2B.1 and MSCP SAP covered species. San Diego barrel cactus is a perennial stem succulent in the cactus family that occurs in chaparral, coastal sage scrub, valley and foothill grassland, and vernal pool habitat at elevations up to 1,500 feet amsl. This species blooms yellow to greenish flowers from March to June. Much of this species habitat has already been removed in its range, and its remaining habitat is threatened by development, agriculture, and other disturbances.

Suitable habitat for San Diego barrel cactus is present only in the disturbed sandy coastal dunes and Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site. Historical locations for this species occur within 1 mile of the La Jolla Shores project site, but not in the survey area (Figures 8 and 8b) (CDFW 2024b; Calflora 2024). Although San Diego barrel cactus, which is identifiable both during and outside of its blooming period, was not observed during the surveys, no focused rare plant survey was conducted, and it could be present in the survey area.

ASMDs under the MSCP SAP for San Diego barrel cactus in the CRMP Phase 1 area include measures to protect this species from edge effects, unauthorized collection, and include appropriate fire management/control practices to protect against a too frequent fire cycle (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.3.10 San Diego Marsh Elder (*Iva hayesiana*), CRPR 2B.2

San Diego marsh elder is a CRPR 2B.2 species. San Diego marsh elder is a shrubby, perennial herb in the sunflower family that occurs in alkali flats, swamps, marshes, and streambanks below 980 feet amsl. This species has green oval-shaped leaves that are fleshy, hairy, and aromatic and simple, yellow flowers that bloom between April and October. Threats to this species include waterway channelization, coastal development, vehicles, and non-native plant introduction (CNPS 2023).

Suitable habitat for San Diego marsh elder is present only in the coastal salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. One historical location for this species occurs within 1 mile of the Sunset Cliffs project site but not in the survey area (Figures 8 and 8f) (CDFW 2024b; Calflora 2024). Although San Diego marsh elder, which is identifiable both during and outside of its blooming period, was not observed during the surveys, no focused rare plant survey was conducted, and it could be present in the survey area.

5.4.3.11 South Coast Saltbush (*Atriplex pacifica*), CRPR 1B.2

South coast saltbush is a CRPR 1B.2 species that occurs in coastal bluff scrub, coastal dunes and scrub, and playa habitats at elevations below 460 feet amsl. South coast saltbush grows in mats with reddish-green scaly stems, oval leaves, and small green flowers that bloom from March through October. This species is threatened by development and non-native plant introduction.

Suitable habitat for south coast saltbush is present only in the disturbed sandy coastal dunes in the eastern portion of the Ocean Beach – Dog Beach project site. No historical locations for this species occur in or within 1 mile of the survey area (CDFW 2024b; Calflora 2024). Although this species was not observed during the surveys conducted during this species' blooming period, no focused rare plant survey was conducted, and it could be present in the survey area.

5.4.4 Sensitive Wildlife Species Observed

The following seven sensitive wildlife species were observed in the survey area during the biological surveys conducted for the project: Belding's savannah sparrow, California brown pelican, California sea lion, Caspian tern, double-crested cormorant, long-billed curlew, and monarch butterfly. Of the seven sensitive wildlife species observed in the survey area, Belding's savannah sparrow, California brown pelican, and long-billed curlew are covered under the MSCP SAP (City of San Diego 1997). The sensitive wildlife species observed during the biological surveys are shown on Figure 9 and are described in the following subsections. The ASMDs for the sensitive wildlife species covered under the MSCP SAP are also described below as applicable (City of San Diego 1997).

5.4.4.1 Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*), SE, MSCP SAP Covered

Belding's savannah sparrow, a state listed as endangered and MSCP SAP covered species, is a small, heavily and dark-streaked subspecies of savannah sparrow endemic to marshes. It is a wetland-dependent bird that is found year-round in Southern California coastal salt marshes. Belding's savannah sparrow is ecologically associated with dense pickleweed, where most nests are found. They can also be found nesting in other dense, ground cover marsh species (i.e., saltgrass) where they weave their nest into the plants creating a tunnel entrance into canopy which conceals the nest. During summer, it mainly consumes insects and will consume seeds and invertebrates in winter, as available. Threats to this species include loss of nesting and foraging habitat from the expansion of human development.

One individual Belding's savannah sparrow was observed in the southern coastal salt marsh and estuarine habitat at the eastern edge of the Ocean Beach – Dog Beach survey area during the August 2023 biological survey (Figure 9). This individual was observed foraging along the southern edge of the estuarine habitat. Belding's savannah sparrow was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). There is a high potential for this species to forage and nest in the pickleweed that occurs in the southern coastal salt marsh in the eastern portion of the Ocean Beach – Dog Beach project site and within Smiley Lagoon to the north and east.

The ASMD under the MSCP SAP for Belding's savannah sparrow in the CRMP Phase 1 area includes specific measures to protect against detrimental edge effects to the species (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.4.2 California Brown Pelican (*Pelecanus occidentalis californicus),* FP, MSCP SAP Covered

California brown pelican is a CDFW fully protected and MSCP SAP covered species. California brown pelican is a large, stocky seabird with very long wings, a thin neck, and very long bill that has a stretchy throat pouch for capturing fish. Adults are gray-brown with yellow heads and white necks. This species occurs along San Diego County's coast and nearby ocean during winter and migration (Unitt et al. 2004). Some non-breeding individuals have been found remaining in the County during spring. The only long-term California brown pelican breeding colonies occur on the Anacapa and Santa Barbara Islands. A colony of Middle Island of Los Coronados had 285 active nests in 1988 (Unitt et al. 2004). This species primarily eats small fish that form schools near the surface of the water but have been known to steal food from other seabirds, scavenge dead animals, and eat invertebrates such as prawns. Threats to this species include loss of nesting habitat and pollution, particularly oil and sewage spills.

California brown pelican was observed during the biological surveys (Figure 9). Numerous individuals were observed flying along the coast in the survey area and observed foraging in the open water habitat west of the survey area. This species was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). California brown pelican is not expected to nest in the survey area.

The MSCP SAP does not include ASMDs for California brown pelican (City of San Diego 1997).

5.4.4.3 California Sea Lion (*Zalophus californianus*), MMPA

California sea lion, a Marine Mammal Protection Act (MMPA) species, is an eared seal with relatively long fore flippers, and hind flippers that can rotate beneath the body (Tremor et al. 2017). This species is sexually dimorphic, with adult males being much larger than adult females. Most adult males are dark brown, adult females are blond to dark brown, and pups' fir lightens from dark brown to light as they age. California sea lions eat a variety of prey, primarily squid and fish. Within San Diego County, California sea lions are commonly observed swimming in the bays or offshore, hauled up on rocks, buoys, and marinas, or rafting as a group offshore. The nearest rookery to San Diego County is at Los Coronados Islands off Tijuana, Mexico. Threats to this species include loss of rookery habitat and pollution, particularly discarded fishing gear and oil spills.

One California sea lion was observed swimming offshore southwest of the Sunset Cliffs project site during the 2023 biological surveys (Figure 9). Suitable resting/haul-out and foraging habitat occurs throughout the survey area, particularly along the Pacific Ocean shoreline. Suitable foraging habitat is present along the coast within the survey area. There is a high potential for California sea lions to be using the beaches within the survey area as haul-out locations, but no known rookery occurs within the survey area.

5.4.4.4 Caspian Tern (*Hydroprogne caspia*), BCC

Caspian tern, a bird of conservation concern, is a large, heavy-bodied seabird with a large head, a thick, straight, red-orange pointed bill, shallowly forked tail, and long, pointed wings. It is the largest tern in the world, known not only by its size but its raspy call when observed. Adults are white overall with pale gray underwings with a black crown. This species nests on sandy estuarine shores, levees in salt ponds, and islands in alkali and freshwater lakes, and forages in lacustrine, riverine, and fresh and saline emergent wetland habitats along the California coast. Caspian terns nest in colonies and feed on small fish in freshwater lakes, estuaries, and salt ponds. In San Diego County, a large colony of Caspian tern is reported having occupied the salt ponds (salt works) in southern San Diego Bay since the 1940s (Unitt et al. 2004). This species eats primarily fish captured by diving into the water but is known to supplement its diet with crustaceans such as crayfish and occasionally large insects. Threats to this species include loss of nesting colony habitat, deterioration of habitats by introduced exotic plants, and pollution, particularly discarded fishing gear and oil spills.

Caspian tern was observed foraging in the survey area, specifically in the open water habitat in and west of the Sunset Cliffs project site, during the biological surveys (Figure 9). Suitable foraging habitat and available prey occur within the open water habitat in the survey area. Further, the survey area could be used as foraging habitat for the known Caspian tern colony approximately 12 miles southeast in southern San Diego Bay.

5.4.4.5 Double-Crested Cormorant (*Phalacrocorax auritus*), WL

Double-crested cormorant, a CDFW watch list species, is a large waterbird with a small head, long, kinked neck, and a thin, strongly hooked bill. Adults are brown-black with a small patch of yellow-orange skin on the face. Double-crested cormorants inhabit coasts and banks of inland lakes, and fresh, salt, and estuarine waters (Unitt et al. 2004). This species resides along the entire coast of California, and nests on undisturbed cliffs, rugged slopes, and live or dead trees. Double-crested cormorants perch beside open water on unvegetated surfaces and require an elevated perch or open length of water for take-off. This species eats primarily fish captured by swimming underwater, with just a few insects, crustaceans, or amphibians supplementing their diet. Threats to this species include loss of nesting habitat, and pollution, particularly discarded fishing gear and oil spills.

Double-crested cormorants were observed swimming in the open water and perching along the edge of the sandstone cliffs in the survey area during biological surveys (Figure 9). This species was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although no suitable nesting habitat is present, the large area of open water along the western edge of the survey area provides suitable foraging habitat for this species.

5.4.4.6 Long-Billed Curlew (*Numenius americanus*), WL, MSCP SAP Covered

Long-billed curlew is a CDFW watch list and MSCP SAP covered species. Long-billed curlew is a long-legged shore bird with a very long, thin, curved bill, long neck, and small rounded head. Adults are speckled and barred in browns above with a pale cinnamon wash throughout and a plain cinnamon belly. Observations of this species in winter range from uncommon to relatively common, along most of the California coast. It is primarily a migrant species and/or winter visitor in San Diego County and has been documented frequently in southern San Diego Bay during migration or over winter (Unitt et al. 2004). Long-billed curlew prefers large coastal estuaries, upland herbaceous areas, and cropland habitats and feeds on aquatic invertebrates in intertidal mudflats. Long-billed curlew nests on elevated interior grasslands and wet meadows adjacent to lakes or marshes. Threats to this species include loss of nesting and foraging habitat and climate change.

Long-billed curlew was observed in the survey area, specifically foraging on the sandy beaches in the Sunset Cliffs project site, during the biological surveys (Figure 9). Although no suitable nesting habitat is present, suitable foraging habitat and available prey occurs in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site and within the beaches in the western portions of the survey area.

The MSCP SAP does not include ASMDs for long-billed curlew (City of San Diego 1997).

5.4.4.7 Monarch Butterfly (*Danaus plexippus*), FC

On December 15, 2020, the USFWS found that adding the monarch butterfly to the list of threatened and endangered species is warranted but precluded by higher-priority species reviews and work (USFWS 2021). Monarch butterfly is one of the most recognizable butterfly species, with orange wings laced with black lines and bordered with white dots. Its wingspan is 3.7 to 4.1 inches. This species occurs in patches of milkweed (*Asclepias* sp.), which is the species' caterpillar host plant. Although larvae only eat milkweed, adult monarchs feed on a variety of nectar-bearing flowers. Monarch butterflies are found across North America wherever suitable feeding, breeding, and overwintering habitat exists. Monarch butterflies overwinter in groves of eucalyptus, cypress, and pine trees along the California coast and high-elevation forests in Mexico. Threats to this species include habitat loss, climate change, and agriculture.

Adult monarch butterflies were observed flying through the Ocean Beach – Dog Beach survey area during the August 2023 survey (Figure 9). A large number of mature ornamental trees, including eucalyptus and pines, are present in the developed portions of the survey area that would provide suitable overwintering habitat for monarch butterfly. No milkweed patches were observed in the survey area that would be suitable for monarch butterfly caterpillars to occupy.

5.4.5 Sensitive Wildlife Species Not Observed With a Moderate or High Potential to Occur

Based on the literature and database review, a total of 23 sensitive wildlife species were considered for their potential to occur in the survey area but were not observed during the biological resources surveys (Table 4). Of this total, 15 sensitive wildlife species were determined to have a moderate or high potential to occur in the survey area but were not observed during the biological resource surveys, including American peregrine falcon (*Falco peregrinus anatum*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi)*, black tern (*Chlidonias niger*), California least tern (*Sternula antillarum browni*), Cooper's hawk (*Accipiter cooperii*), Costa's hummingbird (*Calypte costae*), elegant tern (*Thalasseus elegans*), light-footed Ridgway's rail (*Rallus obsoletus levipes*), Mexican long-tongued bat (*Choeronycteris mexicana*), northern harrier (*Circus hudsonius*), northwestern San Diego pocket mouse (*Chaetodipus fallax)*, osprey (*Pandion haliaetus*), reddish egret (*Egretta rufescens*), southern California legless lizard (*Anniella stebbinsi)*, and wandering skipper (*Panoquina errans*). Of these species, American peregrine falcon, Belding's orange-throated whiptail, California least tern, Cooper's hawk, elegant tern, light-footed Ridgway's rail, northern harrier, reddish egret, and wandering skipper are covered by the MSCP SAP. These sensitive wildlife species with moderate or high potential to occur are described in the following subsections. The ASMDs for the sensitive wildlife species covered under the MSCP SAP are also described below as applicable (City of San Diego 1997).

5.4.5.1 American Peregrine Falcon (*Falco peregrinus anatum*), FDL, BCC, SDL, FP, MSCP SAP Covered

American peregrine falcon is a federally delisted, Bird of Conservation Concern, state delisted, CDFW fully protected, and MSCP SAP covered species. American peregrine falcon is a large falcon with long, pointed wings and a long tail, and adults are blue-gray above with barred underparts and dark head. This species inhabits riparian woodland, forest, inland wetlands, and coastal habitats (Unitt 2004). This subspecies migrates throughout California, and breeds along the coast of Southern and Central California, inland north coastal mountains, Klamath Mountains, Cascade Range, Sierra Nevada, and Channel Islands. Approximately 15 pairs of American peregrine falcons are known in San Diego County, with several pairs known to nest along the coast in Salt Works, La Jolla Torrey Pines, and Downtown San Diego, including the Coronado Bay Bridge, over the last 35 years. American peregrine falcons eat a variety of birds and bats and are known to occasionally steal fish and rodents captured by other raptors. Threats to this species include pesticide poisoning, habitat loss, hunting, and the taking of eggs and young.

American peregrine falcon was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys. However, suitable foraging habitat and prey are present along the coastline throughout the survey area, particularly in the estuarine habitat in the eastern

portion of the Ocean Beach – Dog Beach project site. No cliffs or high rise (or bridge) ledges suitable for nesting are present. Only one ground nest has ever been documented for this species in San Diego County; on Salt Works in South San Diego Bay in 2006. Besides the City-documented observances, no other historical locations of this species are documented within 1 mile of the survey area.

The MSCP SAP does not include ASMDs for American peregrine falcon (City of San Diego 1997).

5.4.5.2 Belding's Orange-Throated Whiptail (*Aspidoscelis hyperythra beldingi*), WL, MSCP SAP Covered

Belding's orange-throated whiptail, a CDFW WL and an MSCP SAP-covered species, is small, ranging from 2 to 2.75 inches in length, and has a slim body and long tail that can reach up to two times its body length. Coloring ranges from black, dark brown, or grayish with six or fewer pale yellow or whitish stripes. The throat and chest have a distinctive orange patch, which brightens during the breeding season. Belding's orange-throated whiptail occurs in coastal sage scrub, chaparral, edges of riparian woodlands, washes, and weedy, disturbed areas adjacent to these habitats throughout Southern California and Baja California, Mexico. This species eats small invertebrates, including spiders, scorpions, centipedes and termites, and small lizards. Breeding begins in June (some accounts as early as April), with eggs hatching in July and August (Nafis 2024; CDFW 2000). Threats to this species include development and habitat fragmentation.

Suitable habitat for Belding's orange-throated whiptail is present only in the disturbed sandy Diegan coastal sage scrub with surrounding weedy areas in the eastern portion of the Ocean Beach – Dog Beach project site. No termites that could provide a food source for Belding's orange-throated whiptail were observed in the survey area. Historical locations for this species occur within 1 mile of the Pacific Beach – Tourmaline Surf Park project site, but not in the survey area (Figures 8 and 8c) (CDFW 2024b; USFWS 2024b).

ASMDs under the MSCP SAP for Belding's orange-throated whiptail in the CRMP Phase 1 area must address edge effects (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.3 Black Tern (*Chlidonias niger*), SSC

Black tern, a CDFW species of special concern, is a small seabird with a thin, pointed bill, long, pointed wings, a shallowly forked tail, and short legs. Adults in breeding plumage are dark gray above with black head and black underparts, with pale underwings and undertail. Black tern is a common spring and summer visitor in California, however, are primarily concentrated around the central coast. During migration, black terns use the Salton Sea, and few now reach the coast of Southern California (Unitt 2004). This species is found in fresh emergent wetlands, bays, salt ponds, river mouths, and pelagic waters, and is restricted to freshwater habitats while breeding.

This species forages by hovering above wet meadows and fresh emergent wetlands feeding on small fish and insects, and nests in dense wetland vegetation. Threats to this species include habitat loss and degradation of established breeding grounds.

Black tern was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys. However, suitable foraging habitat is present along the coastline throughout the survey area, particularly in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. While suitable foraging habitat is present in the salt marsh and open water areas throughout of the CRMP Phase 1 area, the black tern is an uncommon migrant and not known to nest in coastal San Diego County. Besides the City-documented observances, no other historical locations of this species are documented within 1 mile of the survey area.

5.4.5.4 California Least Tern (*Sternula antillarum browni*), FE/SE, FP, MSCP SAP Covered

California least tern is federally listed as endangered, state listed as endangered, is a CDFW fully protected species, and is a MSCP SAP covered species. California least tern is the smallest tern in North America with long, narrow wings and body and a slender, sharp bill. Breeding adults are pale gray and white, with a black cap, white forehead, and yellow bill. This species breeds along marine and estuarine shores, and in abandoned salt ponds in April in Southern California and May in Northern California (Unitt et al. 2004). This species is a resident in lacustrine waters near the coast of Southern California (Unitt et al. 2004). California least tern nests on barren to sparsely vegetated habitat with sandy or gravelly substrate near water that lacks disturbance from humans and other large terrestrial animals (Unitt et al. 2004). California least tern feeds on small fish they catch by diving into the water. Threats to this species include loss of nesting habitat and the introduction of mesopredators (dogs, cats, crows, skunks, foxes, and raccoons) from nearby development.

California least terns may have historically nested within the open sandy soils in the sparsely vegetated southern foredune habitat in the Ocean Beach – Dog Beach project site, however, the surrounding urban development and disturbance to the beaches in this area likely extirpated any nesting colonies and is currently preventing California least tern from nesting. Therefore, nesting California least terns are not expected within the survey area. Known California least tern nesting colonies are located elsewhere within the County (i.e., Mission Bay, San Dieguito Lagoon, South Bay saltworks, Coronado Island). However, suitable foraging habitat occurs within the open water of the survey area providing high potential for California least tern to be foraging within the survey area.

ASMDs under the MSCP SAP for California least tern in the CRMP Phase 1 area include protection of nesting sites from human disturbance during the breeding season, predator control,

and specific measures to protect against detrimental edge effects to the species (City of San Diego 1997). Incidental take (during the breeding season) associated with maintenance or removal of dikes or levees, and beach maintenance or enhancement is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.5 Cooper's Hawk (*Accipiter cooperii*), WL, MSCP SAP Covered

Cooper's hawk is a CDFW watch list and MSCP SAP covered species. It is a medium-sized hawk with rounded wings and a long tail with a rounded tip. Adults are blue-gray above with reddish bars on their underparts and a thickly banded tail. It inhabits most wooded parts of California year-round at elevations from sea level to above 9,000 feet amsl. Cooper's hawk once strictly preferred dense coast live oak forests or riparian forests and woodlands usually near water. Since the latter part of the 20th century, Cooper's hawk has adapted to urban settings tremendously and is now as ubiquitous in urban eucalyptus woodland settings as it is in natural habitats. In the County, Cooper's hawk still uses oaks for nesting, but documentation shows twice as many nests in eucalyptus trees than in oaks. The species will also nest in willow, pine, redwood, and avocado trees and, in all tree species, will construct nests high in the tree but below the canopy (Unitt et al. 2004). Cooper's hawk pursues prey from perches, especially birds, but will also feed on small mammals, reptiles, or amphibians. This species is threatened by habitat fragmentation and loss, hunting, and pest control.

Cooper's hawk was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys; however, suitable foraging habitat occurs within the native and non-native vegetation and land cover types in the survey area. Suitable nesting habitat for Cooper's hawk is limited to the ornamental trees within and along the edges of the developed land throughout the survey area. Other historical locations are documented within the region but not in the survey area (CDFW 2024b; USFWS 2024b).

The ASMD under the MSCP SAP for Cooper's hawk in the CRMP Phase 1 area includes establishment of 300-foot impact avoidance areas around active nests (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.6 Costa's Hummingbird (*Calypte costae*), BCC

Costa's hummingbird, a bird of conservation concern, is small and compact, with short wings and tail. Adult males have purple iridescent crown and gorget (throat patch), which flares out along the sides of their neck, and pale green back and vest. Costa's hummingbird is a common summer resident in Southern California and winters along the southern coast and southern deserts (Unitt et al. 2004). This species occurs in a variety of habitats throughout San Diego County, including arid habitats, desert washes, edges of desert riparian and valley foothill riparian, coastal scrub, desert

scrub, desert succulent shrub, lower-elevation chaparral, and palm oasis. Costa's hummingbird nests in a variety of trees, cacti, shrubs, woody forbs, and vines at an average of 5 feet in height. This species forages on flowers, primarily desert blooms in the late winter and spring, and flowering sage scrub and chaparral plants in the spring and summer. Threats to this species include urban development, non-native invasive species, and competition from other common hummingbird species.

Costa's hummingbird was documented south of Smiley Lagoon during City biological resources surveys conducted in 2022 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys; however, flowers preferred by Costa's hummingbird for foraging occur in the Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site and in the ornamental vegetation in the urban/developed land throughout the survey area. Suitable nesting habitat is limited to the Diegan coastal sage scrub in eastern portion of the Ocean Beach – Dog Beach project site; however, this habitat is highly disturbed and isolated. Besides the City-documented observances, no other historical locations of Costa's hummingbird are present within 1 mile of the survey area.

5.4.5.7 Elegant Tern (*Thalasseus elegans*), WL, MSCP SAP Covered

Elegant tern, a CDFW watch list and MSCP SAP Covered species, is a medium-sized, slender tern with a long, thin, slightly drooping bill, wings that are long, slender and pointed, and a medium-length forked tail. Breeding adults are pale gray above and white-pink below, with a shaggy black crest, orange bill, dark gray outer primaries, and dark legs. Elegant tern is a post-nesting visitor to Southern California coastal areas arriving from breeding grounds in Mexico. However, there is a small nesting colony in San Diego Bay, and post-breeders frequent seacoasts, mudflats, bays, estuaries, and lagoons (Unitt et al. 2004). This species prefers habitats along inshore coastal waters, bays, estuaries, and harbors. This species feeds on fish in shallow ocean waters and congregates on beaches and tideflats when not feeding. Threats to elegant tern include habitat degradation, overfishing, and predation by non-native and invasive species.

Elegant tern was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the 2023 Harris biological surveys, suitable foraging habitat and available prey occurs along the coastline throughout the survey area, particularly in the estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Further, the suitable habitat within the survey area could be used as foraging habitat for the known nesting colony approximately 12 miles south in southern San Diego Bay. Established elegant tern nesting colonies are located elsewhere and open dune and flat areas protected from tides suitable for nesting are limited within the survey area. Besides the City-documented observances, no other historical locations of this species occur within 1 mile of the survey area.

ASMDs under the MSCP SAP for elegant tern in the CRMP Phase 1 area include protection of nesting sites from human disturbance during reproductive season, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of levees/dikes is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.8 Light-Footed Ridgway's Rail (*Rallus obsoletus levipes*) FE, SE, FP, MSCP SAP Covered

Light-footed Ridgway's rail is federally listed as endangered and state listed as endangered, is a CDFW fully protected species, and is an MSCP SAP covered species. Light-footed Ridgway's rail is a medium-sized, chicken-like marsh bird with short tail, long, slightly down-curved bill, and rounded wings. Adults are gray or reddish with dull stripes along their flanks. This species is a common yearlong resident in coastal saline emergent wetlands along Southern California from Santa Barbara to San Diego Counties (Unitt et al. 2004). This species forages in higher marsh vegetation, along vegetation and mudflat interface, and along tidal creeks. Light-footed Ridgway's rail prefers emergent wetland dominated by pickleweed and California cordgrass. This species nests in lower saline emergent wetlands and builds a platform concealed by a canopy of vegetation. Light-footed Ridgway's rail is opportunistic and omnivorous, eating whatever is available, including crabs, crustaceans, fish, eggs, and plant matter. Threats to this species include habitat loss and fragmentation, predation by non-native species, and water contamination.

Light-footed Ridgway's rail was documented in the eastern portion of Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the 2023 Harris biological surveys, suitable foraging habitat and available prey occurs, but is limited to, the estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. There are no known Light-footed Ridgway's rail nesting sites within the survey area, and the available estuarine vegetation observed in Smiley Lagoon is low-growing and likely does not provide the concealment preferred by this species for nesting. Further, the surrounding urban development and human activity within proximity to the available estuarine habitat could reduce the suitability of the CRMP Phase 1 area for the species. Besides the City-documented observances, no other historical locations of this species occur within 1 mile of the survey area.

ASMDs under the MSCP SAP for light-footed Ridgway's rail in the CRMP Phase 1 area include active management of wetlands to ensure a healthy tidal saltmarsh environment and specific measures to protect against detrimental edge effects to the species (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.9 Mexican Long-Tongued Bat (*Choeronycteris mexicana*), SSC

Mexican long-tongued bat, a CDFW species of special concern, is a medium-sized bat with big eyes, a short tail, and a long rostrum with a nose leaf. Adults are gray-brown above and lighter below. Mexican long-tongued bat roosts in caves, mines, rock crevices, under exposed tree roots, and in buildings in the County during migration (some may overwinter) (Tremor et al. 2017). This species forages on nectar from both agave and cactus blossoms. Threats to this species include loss of roosting habitat in caves to mining and tourism.

The survey area contains an abundance of ornamental plants, including agave and cacti, primarily in and surrounding the residential and commercial developments, that provide suitable Mexican long-tongued bat foraging habitat during migration and winter months. Suitable roosting habitat for Mexican long-tongued bat is available in the residential structures throughout the eastern portions of the survey area. This species has been documented within 1 mile of the Ocean Beach – Dog Beach, Ocean Beach – Pier, and Sunset Cliffs project sites but not in the survey area (Figures 8, 8a, 8e, and 8f) (CDFW 2024b).

5.4.5.10 Northern Harrier (*Circus hudsonius*), SSC/MSCP SAP Covered

Northern harrier is an CDFW species of special concern and MSCP SAP covered species. Northern harrier is a slender, medium-sized raptor with long, broad wings, a long, rounded tail, a flat, owl-like face, and a sharply hooked bill. Adult males are gray above and whitish below with black wingtips, a dark trailing edge to the wing, and a black-banded tail. This species uses a wide variety of open habitats in California, including deserts, coastal sand dunes, pasturelands, croplands, dry plains, grasslands, estuaries, flood plains, and marshes. Northern harrier also forages over coastal sage scrub or other open scrub communities hunting small mammals, reptiles, amphibians, and birds. Nesting areas are associated with marshes, pastures, grasslands, prairies, croplands, desert shrub steppe, and riparian woodland (Unitt et al. 2004). Winter habitats similarly include a variety of open habitats dominated by herbaceous cover. Northern harrier populations are most concentrated in areas with low vegetation. Threats to this species include development, habitat loss and fragmentation, wetlands destruction, pest control, hunting, and agriculture.

Northern harrier was documented south of Smiley Lagoon during City biological resources surveys conducted in 2019 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys. However, suitable foraging habitat occurs within the native and non-native vegetation and land cover types, particularly the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. While nesting is more limited due to dense human presence, mature ornamental trees within and along the edges of the urban/developed land throughout the survey area could be used due to the nearby foraging habitat. Besides the City-documented observances, no other historical locations for this species are documented within 1 mile of the survey area.

ASMDs under the MSCP SAP for northern harrier in the CRMP Phase 1 area include establishment of an impact avoidance area (900 feet or maximum possible within the preserve) around active nests. In addition, the preserve management coordination group shall coordinate efforts to manage for wintering northern harriers' foraging habitat within the MSCP preserves (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.5.11 Northwestern San Diego Pocket Mouse (*Chaetodipus fallax fallax*), SSC

Northwestern San Diego pocket mouse, a CDFW species of special concern, is a moderate-sized pocket mouse with a long, bicolored tail, dark brown underparts, predominant white spines on the flanks, and a warm buff lateral line. This species prefers rocky habitat near shrubs but can be found in a variety of habitat types, including grassland and sage scrub. Shrubs provide forage and essential escape cover from predators. Soil preference ranges from loose and sandy soils to gravel to mixed rock on moderate to steep slopes. This species forages mainly on seeds, preferring chia and grass seeds, but is known to eat some leaves and stems (SDNHM 2017). Threats to this species include habitat loss and fragmentation due to urban development. Suitable habitat for Northwestern San Diego pocket mouse is present only in the loose sandy soils of the Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site. One historical location for this species occurs within 1 mile of the Sunset Cliffs project site but not in the survey area (Figures 8 and 8f) (CDFW 2024b; USFWS 2024b).

5.4.5.12 Osprey (*Pandion haliaetus*), WL

Osprey is a CDFW watch list species. Osprey are very large, slender-bodied hawk with long, narrow wings, and long legs. Adults are brown above and white below, with a white head and broad brown stipe through the eye. This species is a common resident in much of coastal San Diego County, occurring in small numbers along the coast and on inland lakes (Unitt et al. 2004). Osprey build huge stick nests that are typically used year after year, augmented with new sticks each season. Their tendency to use human-made structures is well documented in San Diego County, and their most frequently used nesting structures include racks of floodlights for ballfields (Unitt et al. 2004). This species has been observed nesting within San Diego County at inland lakes and urban areas within proximity to the coast but is known to occur more widely in winter than during breeding season. Osprey eat almost exclusively fish captured from the surface of the water but have been known to occasionally scavenge dead birds, snakes, small mammals, and salamanders. Threats to this species include predation of eggs by other birds of prey, exposure to mercury, and coastal development.

Osprey was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys. However, suitable foraging habitat and prey are present within the open water along the coastline throughout the survey area, particularly in the open water and estuarine

habitat in the eastern portion of the Ocean Beach – Dog Beach project site. Although osprey nesting has not been observed within the survey area, this species is commonly observed nesting on light poles and other human-made structures throughout coastal San Diego County. Besides the City-documented observances, no other historical locations of this species occur within 1 mile of the survey area.

5.4.5.13 Reddish Egret (*Egretta rufescens*), MSCP SAP Covered

Reddish egret, an MSCP SAP covered species, is a large heron with long, sturdy legs, long neck, and a thick, dagger-like bill. All adults have two-toned bills (pink at the base and black at the tip) and blue legs; however, dark morph adults are rich grayish blue bodies with vivid pinkish-cinnamon head and neck while white morph adults are snow white overall. Reddish egret is a non-breeding visitor along the coast of Southern California, with breeding occurring primarily in the Caribbean. San Diego County is the northernmost limit of this species' usual range along the Pacific coast (Unitt et al. 2004). This species prefers marsh habitat and is an active forager in coastal shallow salt waters, feeding on fish. Threats to reddish egret include coastal development, recreational disturbance at foraging and breeding sites, habitat degradation, and increased pressure from predators.

Reddish egret was documented in and surrounding Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). Although this species was not observed during the 2023 Harris biological surveys, suitable foraging habitat and available prey occurs along coastline in the survey area, particularly in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach project site. There are no established nesting sites for this species in or within 1 mile of the survey area. Besides the City-documented observances, no other historical locations occur within 1 mile of the survey area.

The MSCP SAP does not include ASMDs for reddish egret (City of San Diego 1997).

5.4.5.14 San Diegan Legless Lizard (*Anniella stebbinsi*), SSC

San Diegan legless lizard, a CDFW species of special concern, is a small, slender lizard with a shovel-shaped snout, smooth, shiny scales, a blunt tail, and no legs. San Diegan legless lizard occurs in the sandy soils of coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans. This species prefers habitats in coastal dune, valley foothill, chaparral, and coastal scrub types where its preferred prey of larval insects, beetles, termites, and spiders are present (CaliforniaHerps 2024). San Diegan legless lizard conceals itself under rocks and leaf litter in loose soil. Threats to this species include habitat loss and invasive species.

Suitable habitat for San Diegan legless lizard is present only in the disturbed sandy coastal dunes and Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site. While no termites were observed in the survey area, larval insects, beetles and spiders that could

provide a food source for San Diegan legless lizard as presumed to be present. Historical locations for this species occur within 1 mile of all six project sites but not in the survey area (Figures 8 and 8a through 8f) (CDFW 2024b; USFWS 2024b).

5.4.5.15 Wandering Skipper (*Panoquina errans*), MSCP SAP Covered

Wandering skipper, a MSCP SAP covered species, is a small, olive brown butterfly with a row of small, clear spots on the forewings and no markings on the hindwings. The wandering skipper occurs along the coast from Santa Barbara to Baja California Sur, Mexico. This species occurs in coastal lagoons and coastal marshes within San Diego County (Faulkner and Klein 2024). Wandering skipper's larval host plant is saltgrass (*Distichlis spicata***)** and common nectar sources include Frankenia, Cakile, or Heliotropium. Threats to this species include habitat destruction, urban development, and non-native invasive plants.

This species was documented in and adjacent to Smiley Lagoon during City biological resources surveys conducted in 2023 (Figures 8 and 8a). This species was not observed during the 2023 Harris biological surveys. However, suitable salt marsh habitat with larval host plant, saltgrass, that could support wander skipper occurs only in the survey area east of the Ocean Beach – Dog Beach project site. Historical locations of wandering skipper have been documented within the region but not in the survey area (CDFW 2024b; USFWS 2024b).

ASMDs under the MSCP SAP for wandering skipper in the CRMP Phase 1 area include measures to control exotic weeds and invertebrate predators (where appropriate) and control access to saltmarsh habitat (City of San Diego 1997). Refer to Table 5 in Section 6 for ASMD consistency analysis.

5.4.6 Nesting Birds

The survey area contains suitable nesting habitat for several bird and raptor species protected under the CFGC and MBTA. The majority of habitat for nesting birds in the survey area is along the eastern portion of the survey area, primarily the innumerable native and ornamental trees, shrubs, and buildings within and along the edges of the developed land.

The pickleweed present in the southern coastal salt marsh that occurs in the eastern portion of the Ocean Beach – Dog Beach project site provides suitable nesting habitat for sensitive Belding's savannah sparrow. The disturbed Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach project site provides marginally suitable nesting habitat for species that nest in or at the base of shrubs like Costa's hummingbird, California towhee (*Melozone crissalis*), and California scrub jay (*Aphelocoma californica*).

Suitable nesting habitat for tree-nesting species, including Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), and orioles (*Icterus* sp.), as well as raptors such as Cooper's hawk and red-shouldered hawk (*Buteo lineatus*), is present in the non-native woodland

in the Pacific Beach – Tourmaline Surf Park project site. While the cliffs throughout the Sunset Cliffs project site may not be suitable for some cliff-nesting species like American peregrine falcon, which require greater heights, this area could support nesting by other species like cliff swallow (*Petrochelidon pyrrhonota*) and western gull (*Larus occidentalis*). The sandy beaches throughout the survey area and disturbed southern foredunes in the Ocean Beach – Dog Beach project site do not provide high-quality suitable nesting habitat for ground-nesting birds like Caspian tern, elegant tern, and California least tern due to high levels of disturbance, human activity, and predators surrounding those habitats.

The portions of the survey area developed with residential properties and public spaces contain structures and ornamental vegetation like trees and shrubs that could support nesting by a variety of bird and raptor species. The large number of ornamental palm trees throughout the developed land also likely supports species like American crow and orioles, which commonly use these trees for nesting. Additionally, the residential buildings could support nesting of certain species that use structures with eaves, ledges, crevices, cracks, and other "cavities," such as black phoebe (*Sayornis nigricans*), gulls (*Larus* sp.), and Bewick's wren (*Thryomanes bewickii*).

While no birds or raptors were observed nesting in the survey area during the biological resource surveys, the availability of suitable nesting habitat and nearby foraging habitat indicates birds likely use the survey area for nesting.

As previously discussed in Section 3, Regulatory Framework, the project would be required to be in compliance with all federal, state, and local regulations applicable to biological resources as a condition of approval, including the CFGC and MBTA.

5.4.7 Sensitive Roosting Bats

The survey area contains suitable roosting and foraging habitat for both common and sensitive bat species. The numerous ornamental trees and palms within and along the edges of the developed land in eastern portion of the survey area could provide suitable roosting habitat for tree-roosting bats, such as the hoary bat (*Lasiurus cinereus*), western red bat (*Lasiurus blossevillii*), and potentially, the western yellow bat (*Lasiurus xanthinus*). Western red bat and western yellow bat are both CDFW species of special concern. As previously discussed in Section 5.4.5, the ornamental agave and cacti along the eastern edges of the survey area provide suitable foraging habitat for Mexican long-tongued bat (CDFW species of special concern) during migration and winter months. Further, the buildings in the developed land of the survey area provide suitable roosting habitat for Mexican long-tongued bat and other structure-dwelling bats such as the big brown bat (*Eptesicus fuscus*). The shoreline and coast along the western edge of the survey area also provide suitable foraging habitat for bats roosting in the area that forage over sources of open water, such as the western mastiff bat (*Eumops perotis*). While no bats were observed using the survey area for roosting or foraging during

the biological resource surveys, no nighttime focused acoustic surveys were conducted and the availability of suitable habitat indicates bats are likely roosting and foraging in the survey area.

5.4.8 Wildlife Corridors and Habitat Linkages

Wildlife corridors provide routes for local movement and also regional linkages and corridors, often following linear topographic, vegetation, or water features. These corridors can be continuous habitats features, or "steppingstone" areas, providing critical rest and foraging areas for, for example, birds traveling along migratory routes. Local routes of movement provide constant connections to resources that include sources of water, home/cover sites, and foraging areas. Regional linkages and movement corridors provide larger patches of open space to allow relatively free movement of wildlife species along multiple paths between important resources. These areas allow for not only long-term genetic flow between subpopulations but also critical pathways of seasonal/migratory movements. Larger predatory mammals often use regional corridors for hunting and reproduction needs. Potential wildlife corridors can include streams, riparian areas, and culverts under roadways. Habitat characteristics considered included topography, habitat quality, and adjacent land uses.

Wildlife corridors and linkages are areas that maintain ecosystem function and processes, including large animal movement and function through the establishment of the MHPA within the City's MSCP SAP. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained.

Before the field survey, the MSCP SAP was reviewed to confirm the presence of designated habitat linkages and dispersal corridors in the survey area. During the biological surveys, biologists assessed areas identified in the MSCP SAP in the survey area for potential wildlife corridor functions. The survey area does not intersect with a designated core or linkage area as identified within the MSCP SAP.

The survey area is likely to be used as a wildlife movement corridor and provides suitable nesting, foraging, and dispersal areas primarily for marine and anadromous fish, marine mammals, bats, and avian species because of the presence of native vegetation communities (among the last remaining dunes in this part of the City), and its connection to the Pacific coast and open waters along the western edge of the survey area as well as Smiley Lagoon to the east. The survey area provides some movement opportunities for terrestrial species such as reptiles, mesocarnivores (i.e., raccoons), and other smaller mammals. However, the surrounding dense urban development restricts use of the survey area to major movement routes for large mammals, including mule deer and mountain lion.

The survey area also holds value for migrating birds flying through to wintering grounds that are protected by the MBTA. The survey area is within the path of the Pacific Flyway, along which millions of birds, especially waterfowl, migrate annually between Alaska and Canada, through California, to

Mexico and South America. Coastal San Diego provides an important stopover area for a large variety of birds during their annual migration. Further, the survey area supports a variety of vegetation communities, including coastal scrub, dunes, aquatic areas (including subtidal, intertidal, estuarine, southern coastal salt marsh, and beach), cliffs, and non-native woodlands. The aquatic communities in the survey area in particular are high-quality, contiguous sections of these habitats that support north−south movement and linkages to other habitats along the coast. The dense residential and commercial development along the eastern edge of the survey area has the potential to limit east−west wildlife movement through the survey area.

6.1.1 City of San Diego Multiple Species Conservation Program Subarea Plan

The proposed CRMP Phase 1 is required to comply with the General Management Directives outlined in Section 1.5.2 of the MSCP SAP. Table 5, Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives, demonstrates the proposed CRMP's compliance with the MSCP SAP General Management Directives and ASMDs.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
General Management Directives (Section 1.5.2 of the MSCP SAP)		
Mitigation: Mitigation, when required as part of future project-level approvals, shall be performed in accordance with the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines.	Mitigation is required for impacts to sensitive vegetation, sensitive species, and jurisdictional aquatic resources. Direct and indirect impacts to these resources are described in detail in Sections 6.2 through 6.4 of this report.	Project mitigation measures to reduce potentially significant impacts are described in Sections 6.2 through 6.4 of this report. With implementation of the proposed mitigation described in these sections, the identified impacts would be reduced to below a level of significance. The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.
Restoration: Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.	All temporary construction areas in and adjacent to the MHPA would require revegetation following the completion of construction. Construction may result in the recruitment of non-native plant species in the temporary disturbance areas and the removal of native plant species.	In any areas in or adjacent to the MHPA where temporary upland impacts occur as a result of project activities, habitat restoration and erosion control treatments would be installed (MM BIO-4). All restoration and revegetation activities in and adjacent to the MHPA would be required to be conducted in accordance with the . (City of San Diego 2018) and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012a), with specific native species incorporated, as appropriate (MM BIO-4). The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.
Public Access, Trails, and Recreation – Priority 1.2: Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA,	The overall CRMP Phase 1 is consistent with the MSCP SAP General Management Directives for public access, trails, and recreation because no trails or paths are proposed in the MHPA. Any paths proposed by the	No trails or paths are proposed in the MHPA. The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt road as much as possible rather than entering habitat for wildlife movement areas.	CRMP Phase 1 would be limited to the existing developed areas and planned regional parkland areas outside the sensitive vegetation communities and MHPA.	
Litter/Trash and Materials Storage – Priority 1.3: Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.	No hazardous construction materials would be allowed to be permanently stored in or adjacent to the MHPA (including fuel or sediment) during project construction, and any drainage from the construction site must be clear of such materials.	The construction contractor, with support from the qualified monitoring biologist, shall ensure that all areas for staging, storage of equipment and materials, trash, equipment maintenance, and other construction-related activities are conducted in previously developed or disturbed areas and outside the MHPA boundary, wherever possible (MM BIO-2). Typical BMPs, such as having trash containers on site, a demarcated limit of work, and contractor education, would limit the potential for trash and other human disturbance. During construction, the qualified monitoring biologist shall verify in writing on the Consultant Site Visit Record Forms that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction-related activities occurred in sensitive habitat in the MHPA. These activities shall only occur in the designated staging area outside the MHPA and in accordance with a project Water Pollution Control Plan developed in accordance with the City's Storm Water Standards. The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.
Adjacency Management Issues: Enforce, prevent, and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis. Disseminate educational information to residents adjacent to and inside the MHPA to heighten environmental awareness, and inform residents of access, appropriate plantings, construction or disturbance within MHPA boundaries, pet intrusion, fire management, and other adjacency	Appropriate enforcement and educational signage would be placed around the project and educational materials provided for public viewing and distribution at interpretive exhibits provided at the ranger station and/or other appropriate facilities/locations.	In areas adjacent to the MHPA, the project design requirements would include appropriate signage placed and educational materials provided along public paths of travel and at interpretive exhibits as applicable. The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
issues. Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.		
Invasive Exotics Control and Removal: Do not introduce invasive non-native species into the MHPA. Provide information on invasive plants and animals harmful to the MHPA, and prevention methods to visitors and adjacent residents. Encourage residents to voluntarily remove invasive exotics from their landscaping.	Any plant species installed within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive.	The construction contractor shall permanently revegetate all graded, disturbed, or eroded native habitat areas that would not be permanently paved or covered by structures in accordance with the City's Municipal Code, SDBG and Landscape Regulations (City of San Diego 2012b, 2018), and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012a) (MM BIO-4). Enhancement activities would be conducted accordance with the City's Municipal Code, SDBG (City of San Diego 2018), and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012a), in the habitat restoration areas to treat and remove any invasive species present in the reserve and MHPA (MM BIO-4). The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.
Flood Control. Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored. No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts	Any flood control components of the CRMP Phase 1 would be reviewed and approved by the resource agencies and would be designed based on a restoration plan. If improvements to floodplains in the MHPA are proposed, no human-made constraints or barriers would be implemented unless reviewed by the resource agencies, approved, and mitigated for adequately. Stabilization materials would not include riprap, concrete, or other unnatural material. Any rock gabions determined to be necessary would include design features to ensure wildlife movement.	The CRMP Phase 1 proposes the construction and implementation of nature-based coastal resilience and habitat protection structures. The CRMP Phase 1 would not include human-made constraints or barriers or use unnatural stabilization materials in the MHPA. The project-specific designs would be developed in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in SDBG (City of San Diego 2018). The CRMP Phase 1 would be consistent with this MSCP SAP General Management Directive.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level. No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native species. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.		
Area-Specific Management Directives for MSCP Covered Species		
San Diego Barrel Cactus. ASMDs for San Diego barrel cactus must include measures to protect this species from edge effects, unauthorized collection, and include appropriate fire management/control practices to protect against a too frequent fire cycle.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for San Diego barrel cactus through avoidance of impacts to this species' potential habitat during project implementation. Any plant species installed within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive.	Suitable coastal dune and Diegan coastal sage scrub habitats would be avoided by future site-specific project construction. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including San Diego barrel cactus (MM BIO-1 and MM BIO-2). The CRMP Phase 1 would be consistent with this MSCP SAP ASMD for San Diego barrel cactus.
Salt Marsh Bird's-Beak. ASMDs for salt marsh bird's-beak must include measures to reduce threats and stabilize populations (e.g., relocation of footpaths, establishment of buffer areas, etc.), 2) address opportunities for reintroduction, and 3) include measures to enhance existing populations (e.g., protect and improve upland habitat for pollinators). There is a federal recovery plan for this species and management activities should to the extent possible help achieve the specified goals. Any newly found populations shall be evaluated for inclusion in the preserve strategy through acquisition, like exchange.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for salt marsh bird's-beak through avoidance of impacts to this species' potential habitat during project implementation.	Suitable coastal dune habitat would be avoided by future site-specific project construction. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including salt marsh bird's-beak (MM BIO-1 and MM BIO-2). The CRMP Phase 1 would be consistent with this MSCP SAP ASMD for salt marsh bird's-beak.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
Belding's Orange-Throated Whiptail. ASMDs for Belding's orange-throated whiptail must address edge effects.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for Belding's orange-throated whiptail through avoidance of impacts to this species' potential habitat during project implementation.	Suitable Diegan coastal sage scrub habitat would be avoided, as well as potential edge effects, by future site-specific project construction. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including Belding's orange-throated whiptail (MM BIO-1 and MM BIO-2). The CRMP Phase 1 would be consistent with this MSCP SAP ASMD for Belding's orange-throated whiptail.
Belding's Savannah Sparrow. ASMDs for Belding's savannah sparrow must include specific measures to protect against detrimental edge effects to this species.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for Belding's savannah sparrow through avoidance of impacts to this species' potential habitat during project implementation. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required to be conducted during the breeding season of sensitive wildlife and suitable habitat is present within or adjacent to the planned construction area, appropriate measures would be taken to reduce impacts to a level below significant.	Nesting locations for Belding's savannah sparrow would be avoided by future site-specific project construction entirely. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including Belding's savannah sparrow (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be consistent with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. The CRMP Phase 1 would be in compliance with this MSCP SAP ASMD for Belding's savannah sparrow.
California Least Tern. ASMDs for California least tern must include protection of nesting sites from human disturbance during reproductive season, predator control, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of dikes/levees, beach maintenance/enhancement is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for California least tern since the CRMP Phase 1 would avoid all adjacent nesting sites for this species. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required during the breeding season of sensitive wildlife, and suitable habitat is present in or adjacent to the planned construction area, appropriate measures would be taken to reduce impacts to a level below significant.	Nesting locations for California least tern would be avoided by future site-specific project construction entirely. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including California least tern (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be consistent with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. The CRMP Phase 1 would be in compliance with this MSCP SAP ASMD for California least tern.

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
Cooper's Hawk. The ASMD for Cooper's hawk must include establishment of 300-foot impact avoidance areas around active nests.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for Cooper's hawk through compliance with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required to be conducted during the breeding season of sensitive wildlife, and suitable habitat is present within or adjacent to the facility segment planned for maintenance, appropriate measures would be taken to reduce impacts to a level below significant.	The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including Cooper's hawk (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be in compliance with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. Therefore, the CRMP Phase 1 would be in compliance with this MSCP SAP ASMDs for Cooper's hawk.
Elegant Tern. The ASMD for elegant tern must include protection of nesting sites from human disturbance during reproductive season, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of levees/dikes is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for elegant tern through avoidance of impacts to this species' potential habitat during project implementation. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required to be conducted during the breeding season of sensitive wildlife and suitable habitat is present within or adjacent to the planned construction area, appropriate measures would be taken to reduce impacts to a level below significant.	Nesting locations for elegant tern would be avoided by future site-specific project construction entirely. The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including elegant tern (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be consistent with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. The CRMP Phase 1 would be in compliance with this MSCP SAP ASMD for elegant tern.
Light-Footed Ridgway's Rail. ASMDs for light-footed Ridgway's rail must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for light-footed Ridgway's rail through avoidance of impacts to this species' potential habitat during project implementation. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required to be conducted during the breeding season	Foraging habitat for light-footed Ridgway's rail would be avoided by future site-specific project construction entirely. The CRMP Phase 1is required to conform with the MSCP SAP and ASMDs for covered species, including light-footed Ridgway's rail (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be consistent with the MHPA LUAGs (demonstrated in Table 7) protecting against detrimental edge effects, as well as regulations protecting sensitive

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
	of sensitive wildlife and suitable habitat is present within or adjacent to the planned construction area, appropriate measures would be taken to reduce impacts to a level below significant.	nesting birds and raptors, including the CFGC and MBTA. The CRMP Phase 1 would be in compliance with this MSCP SAP ASMD for light-footed Ridgway's rail.
Northern Harrier. The ASMDs for northern harrier must include establishment of an impact avoidance area (900-foot or maximum possible within the preserve) around active nests. In addition, the preserve management coordination group shall coordinate efforts to manage for wintering northern harriers' foraging habitat within the MSCP preserves.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for northern harrier through compliance with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. Whenever possible, project construction activities would be conducted outside the breeding season of sensitive wildlife species. If construction is required to be conducted during the breeding season of sensitive wildlife, and suitable habitat is present within or adjacent to the facility segment planned for maintenance, appropriate measures would be taken to reduce impacts to a level below significant.	The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including northern harrier (MM BIO-2 and MM BIO-3). Further, the CRMP Phase 1 would be required to be in compliance with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. Therefore, the CRMP Phase 1 would be in compliance with this MSCP SAP ASMDs for northern harrier.
Wandering Skipper. ASMDs for wandering skipper must include measure to control exotic weeds and invertebrate predators (where appropriate) and control access to saltmarsh habitat.	The overall CRMP Phase 1 would be consistent with the MSCP SAP ASMDs for wandering skipper through avoidance of impacts to this species' potential habitat during project implementation. Further, the CRMP Phase 1 would include management measures to reduce detrimental edge effects, such as invasive species introduction, unauthorized public access, and domestic pet predation. Any plant species installed within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive.	The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for covered species, including wandering skipper (MM BIO-2 and MM BIO-4). Habitat enhancement activities would be conducted accordance with the City's Municipal Code, SDBG (City of San Diego 2018a), and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012b), within the habitat restoration areas to treat and remove any invasive species present in the reserve and MHPA (MM BIO-6). Compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012a), and NPDES regulations and mitigation measures (MM BIO-2, MM BIO-4 and MM BIO-6) would be implemented to avoid any unauthorized intrusion and to

Table 5. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives

MSCP SAP Directives	Applicability	Implementation
		reduce direct and indirect impacts to MHPA habitats. Therefore, the CRMP Phase 1 would be in compliance with this MSCP SAP ASMDs for wandering skipper.

Notes: ASMD = area-specific management directive; BMP = best management practice; CDFW = California Department of Fish and Wildlife; CFGC = California Fish and Game Code; LDC = Land Development Code; MBTA = Migratory Bird Treaty Act; MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program; RWQCB = Regional Water Quality Control Board; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan; SDBG = Land Development Code—Biology Guidelines; USACE = U.S. Army Corps of Engineers; USFWS = U.S. Fish and Wildlife Service

6.1.2 Multi-Habitat Planning Area

Portions of the Ocean Beach – Dog Beach project site and the Sunset Cliffs survey buffer, outside of the project site, are within the MHPA (Figures 2, 2a, and 2f). Therefore, the proposed CRMP Phase 1 would be required to document compliance with the General Planning Policies and Design Guidelines in Section 1.4.2 of the MSCP SAP, as applicable. Table 6, Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines, demonstrates the proposed CRMP's compliance with the MSCP SAP General Planning Policies and Design Guidelines.

Table 6. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines

	General Planning Policies and Design Guidelines Section 1.4.2 of the MSCP SAP	Analysis
	Roads and Utilities – Construction and Maintenance Policies	
1	All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.	The CRMP Phase 1 would be designed to follow existing developed and disturbed areas to the maximum extent practicable to avoid intrusion into the MHPA, where feasible. Impacts would potentially occur in and directly adjacent to MHPA areas that would result in unauthorized intrusion into MHPA habitats. However, compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations and mitigation measures (MM BIO-2 and MM BIO-4) would be implemented to avoid any unauthorized intrusion and to reduce direct and indirect impacts to MHPA habitats. The CRMP Phase 1 would be consistent with this MSCP SAP Planning Policy.
2	All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required.	The CRMP Phase 1 would be designed to follow existing developed and disturbed areas to the maximum extent feasible but could result in potential impacts to wetland resources as discussed in Sections 6.3 and 6.4. Wetlands and marine habitats would be avoided, to the extent feasible, in each of the project sites. Potential impacts would be mitigated in accordance with the SDBG (City of San Diego 2018) (MM BIO-3 and MM BIO-4). The CRMP Phase 1 would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations, including standard BMPs specifically related to reducing impacts to wetlands and MSCP SAP covered species from dust, erosion, runoff, and introduction of invasive species, generated by construction activities would be implemented. The CRMP Phase 1 would be consistent with this MSCP SAP Planning Policy.
3	Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.	The CRMP Phase 1 would be designed to follow existing developed and disturbed areas to the maximum extent feasible to avoid intrusion into the MHPA. Impacts would potentially occur in and directly adjacent to MHPA areas. However, compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations and mitigation measures (MM BIO-2 and MM BIO-4) would be implemented to avoid any unauthorized intrusion and to reduce indirect impacts to MHPA habitats. Potential impacts would be mitigated in accordance with the SDBG (City of San Diego 2018) (MM BIO-3 and MM BIO-4). The CRMP Phase 1 would be consistent with this MSCP SAP Planning Policy.

Table 6. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines

	General Planning Policies and Design Guidelines Section 1.4.2 of the MSCP SAP	Analysis
4	Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.	All existing wildlife corridors would remain in place after implementation of the CRMP Phase 1, and significant long-term impacts to wildlife corridors and habitat connectivity are not expected to occur in these areas. While project activities may temporarily disrupt wildlife movement through the survey area, the CRMP Phase 1 is not expected to have a significant impact on habitat linkage over the long term because the overall habitat quality of the existing corridors would be protected as a result of project implementation. The CRMP Phase 1 would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations, and mitigation measures would be implemented to reduce potential indirect impacts to wildlife movement corridors (MM BIO-2 through MM BIO-4). The CRMP Phase 1 would be consistent with this MSCP SAP Planning Policy.
5	Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.	Not applicable. No roads are proposed in the MHPA.
6	Development of roads in canyon bottoms should be avoided whenever feasible.	Not applicable. No canyons occur within the survey area.
7	Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.	Not applicable. No roads are proposed in the MHPA.
8	For the most part, existing roads and utility lines are considered compatible uses within the MHPA and therefore will be maintained.	Not applicable. No existing roads or utilities occur in the portion of the MHPA in the survey area.

Table 6. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines

	General Planning Policies and Design Guidelines Section 1.4.2 of the MSCP SAP	Analysis
Fencing, Lighting, and Signage Design Guidelines		
1	Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain-link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain-link to provide added protection of certain sensitive species or habitats (e.g., vernal pools).	Prior to construction activities, the qualified monitoring biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other proposed project conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, plants, and wildlife, including nesting birds) prior to the start of construction (MM BIO-1 and MM BIO-2). Further, the CRMP Phase 1 would be required to be consistent with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA, and appropriate avoidance buffers for nests would be implemented as required. The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.
2	Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low-sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.	Nighttime construction is not expected for the CRMP Phase 1. However, in the event nighttime construction is required, additional measures would be necessary to ensure nighttime construction activity within undeveloped areas containing or adjacent to sensitive biological resources are minimized whenever feasible. Any nighttime lighting would be subject to City Outdoor Lighting Regulations per LDC Section 142.0740. The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.
Materials Storage Design Guideline		
1	Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.	During construction activities, the qualified monitoring biologist shall verify in writing on the Consultant Site Visit Record Forms that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities should occur adjacent to the MHPA or other sensitive habitat (MM BIO-2). These activities shall only occur within the designated staging area located outside the MHPA and in accordance with a project Water Pollution Control Plan developed in accordance with the City's Storm Water Standards. The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.

Table 6. Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines

General Planning Policies and Design Guidelines Section 1.4.2 of the MSCP SAP		Analysis
Flood Control Design Guidelines		
1	Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.	The CRMP Phase 1 proposes the construction and implementation of nature-based coastal resilience and habitat protection structures. The project-specific designs would be developed in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in SDBG (City of San Diego 2018). The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.
2	No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.	The CRMP Phase 1 proposes the construction and implementation of nature-based coastal resilience and habitat protection structures. The CRMP Phase 1 would not include human-made constraints or barriers within the MHPA. The project-specific designs would be developed in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in SDBG (City of San Diego 2018). The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.
3	No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native species. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.	The CRMP Phase 1 proposes the construction and implementation of nature-based coastal resilience and habitat protection structures. The CRMP Phase 1 would not include unnatural stabilization materials within the MHPA. The project-specific designs would be developed in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in SDBG (City of San Diego 2018). The CRMP Phase 1 would be consistent with this MSCP SAP Design Guideline.

Notes: BMP = best management practice; CFGC = California Fish and Game Code; LDC = Land Development Code; MBTA = Migratory Bird Treaty Act; MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program; NPDES = National Pollutant Discharge Elimination System; RWQCB = Regional Water Quality Control Board; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan; SDBG = Land Development Code—Biology Guidelines

6.1.3 Multi-Habitat Planning Area Land Use Adjacency Guidelines

Portions of the Ocean Beach – Dog Beach project site and the Sunset Cliffs survey buffer, outside the project site, occur in the MHPA; therefore, the proposed CRMP Phase 1 would be required to document compliance with the LUAGs. Table 7, Project Consistency Determination with Multi-Habitat Planning Area Land Use Adjacency Guidelines, documents the proposed CRMP's compliance with the MHPA LUAGs.

Table 7. Project Consistency Determination with Multi-Habitat Planning Area Land Use Adjacency Guidelines

MHPA Adjacency Guidelines Section 1.4.3 of the MSCP SAP	Applicability	Implementation
Drainage: All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.	Ground disturbance for the CRMP Phase 1 adjacent to the MHPA would be consistent with the City Storm Water Standards in minimizing construction and post-construction drainage away from the MHPA.	The CRMP Phase 1 would be designed to avoid proposing new development directly adjacent to or in the MHPA. Prior to construction, the MHPA boundary and the limits of ground disturbance would be clearly delineated on the construction documents and surveyed by the construction contractor, with supervision by the qualified monitoring biologist (MM BIO-2). The CRMP Phase 1 would be required to be consistent with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.
Toxics: Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.	No hazardous construction materials storage should be allowed adjacent to the MHPA (including fuel or sediment), and any drainage from the construction site must be clear of such materials. Consistent with the City Storm Water Standards, existing previously legal drainage that flows toward the MHPA shall be minimized.	All project construction areas proposed for staging, storage of equipment and materials, trash, equipment maintenance, and other construction-related activities would be required to be located on previously developed land and away from the MHPA preserve boundary consistent with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.
Lighting: Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	If night work is required adjacent to the MHPA, all lighting should be shielded away from the preserve. No new sources of permanent lighting would be proposed adjacent to the MHPA.	Nighttime construction is not expected for the CRMP Phase 1. However, in the event nighttime construction is required, additional measures would be necessary to ensure nighttime construction activity within undeveloped areas containing or adjacent to sensitive biological resources are minimized whenever feasible. Any nighttime lighting would be subject to City Outdoor Lighting Regulations per LDC Section 142.0740. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.

Table 7. Project Consistency Determination with Multi-Habitat Planning Area Land Use Adjacency Guidelines

MHPA Adjacency Guidelines Section 1.4.3 of the MSCP SAP	Applicability	Implementation
Noise: Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	Construction within and adjacent to suitable habitat for California least tern and other covered species, during the breeding seasons for this species would be avoided to the extent feasible. However, should construction need to occur during the breeding season, noise monitoring would be conducted, and if necessary, temporary sound walls, buffers, or other sound attenuating devices or techniques would be used in areas of concern to reduce noise-related impacts. No long-term noise generating land uses would be proposed within or adjacent to the MHPA.	The CRMP Phase 1 is required to conform with the MSCP SAP and ASMDs for the covered species with a high potential to occur in the survey area, such as California least tern. Further, future site-specific projects would be required to be consistent with regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.
Barriers: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	The Ocean Beach – Dog Beach and Sunset Cliffs project sites that are within and adjacent to the MHPA may need to include permanent fencing, as necessary, to direct public access and reduce domestic animal predation on wildlife.	The CRMP Phase 1 may need to incorporate the installation of permanent fencing as needed to direct public access to appropriate locations, prevent unauthorized intrusion into the MHPA, and reduce domestic animal predation on wildlife. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.
Invasives: No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	Plant species installed within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive.	The construction contractor shall permanently revegetate all graded, disturbed, or eroded native habitat areas that would not be permanently paved or covered by structures in accordance with the City's Municipal Code, SDBG and Landscape Regulations (City of San Diego 2018, 2012b), and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012a) (MM BIO-4). Enhancement activities would be conducted in accordance with the City's Municipal Code, SDBG (City of San Diego 2018), and the City's Municipal Code, Land Development Code—Landscape Standards (City of San Diego 2012a), within any habitat restoration areas to treat and remove any invasive species present in the reserve and within or adjacent to the MHPA (MM BIO-4). The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.

Table 7. Project Consistency Determination with Multi-Habitat Planning Area Land Use Adjacency Guidelines

MHPA Adjacency Guidelines Section 1.4.3 of the MSCP SAP	Applicability	Implementation
Brush Management: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside the MHPA.	The Ocean Beach – Dog Beach project site adjacent to the MHPA is not proposed for residential development and would not require brush management.	Not applicable.
Grading/Land Development: Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.	No manufactured slopes are associated with the project at the programmatic level of analysis.	At project submittal, future site-specific projects would need to demonstrate consistency with Section 1.4.3 of the MSCP SAP, in particular grading/land development, as applicable. The CRMP Phase 1 would be consistent with this MSCP SAP LUAG.

Notes: ASMD = area-specific management directive; CFGC = California Fish and Game Code; LDC = Land Development Code; LUAGs = Land Use Adjacency Guidelines; MBTA = Migratory Bird Treaty Act; MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program; NPDES = National Pollutant Discharge Elimination System; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan

6.1.4 City of San Diego General Plan

The City's General Plan elements applicable to biological resources in the survey area include the Conservation and Recreation Elements. Table 8, Project Consistency Determination with City of San Diego General Plan Conservation and Recreation Elements, documents the proposed CRMP's consistency with the applicable City goals and policies.

Table 8. Project Consistency Determination with City of San Diego General Plan Conservation and Recreation Elements

Goal/Policy	Project
Conservation Element	
B. Open Space and Landform Preservation Goal: Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.	Consistent: The CRMP Phase 1 proposes protections to critical coastal habitats with nature-based resilience solutions thereby preserving and managing the natural landforms and open spaces in San Diego.
Policy CE-B.1: Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.	Consistent: Refer to response to Goal B, Open Space and Landform Preservation Goal, regarding conservation of landforms, open space, and wetland habitats. Regarding preservation of core biological areas and wildlife linkages, all existing wildlife corridors would remain in place after implementation of the CRMP Phase 1.

Table 8. Project Consistency Determination with City of San Diego General Plan Conservation and Recreation Elements

Goal/Policy	Project
Policy CE-B.4: Limit and control runoff, sedimentation, and erosion both during and after construction activity.	Consistent: The CRMP Phase 1 would implement water quality protection measures, such as water quality detention/swale areas, and BMPs. The project would be consistent with the MSCP SAP, the San CRMP Phase 1 RWQCB Municipal Permit, the City's Storm Water Standards (City of San Diego 2012b), and NPDES regulations to ensure the control of polluted runoff, sedimentation, and erosion during construction. Future activities consistent with the CRMP Phase 1 would implement these measures and policies and be consistent with this goal.
C. Coastal Resources Goals: Coastal resource preservation and enhancement. Clean coastal waters by continuing to improve the quality of ocean outfall discharges.	Consistent: Refer to the responses to Goal B, Open Space and Landform Preservation Goal, and General Plan Policy CE-B.1 regarding the preservation and enhancement of coastal resources.
Policy CE-C.1: Protect, preserve, restore, and enhance important coastal wetlands and habitat (tide pools, lagoons, marine canyons) for conservation, research, and limited recreational purposes.	Consistent: Refer to the responses to Goal B, Open Space and Landform Preservation Goal and General Plan Policy CE-B.1 regarding the preservation, restoration, and enhancement of coastal wetlands and habitat.
Policy CE-C.2: Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans.	Consistent: Refer to the response to General Plan Policy CE-B.4.
Policy CE-C.3: Minimize alterations of cliffs and shorelines to limit downstream erosion and to ensure that sand flow naturally replenishes beaches.	Consistent: Refer to the responses to Goal B, Open Space and Landform Preservation Goal and General Plan Policy CE-B.4.
Policy CE-C.4: Manage wetland areas as described in Section H, Wetlands, for natural flood control and preservation of landforms.	Consistent: Refer to the response to General Plan Policy CE-B.4.
Policy CE-C.5: Limit the use of beaches and shorelines to appropriate coastal dependent and ocean-oriented recreational/educational uses as identified in local coastal/community plans.	Consistent: Refer to the response to Goal B, Open Space and Landform Preservation Goal.
Policy CE-C.6: Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.	Consistent: Refer to the response to General Plan Policy CE-B.4.
Policy CE-D.3.d: Improve and maintain urban runoff water quality through implementation of storm water protection measures.	Consistent: Refer to the response to General Plan Policy CE-B.4.

Table 8. Project Consistency Determination with City of San Diego General Plan Conservation and Recreation Elements

Goal/Policy	Project
G. Biological Diversity Goal: Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.	Consistent: Refer to the response to Goal B, Open Space and Landform Preservation Goal. The CRMP Phase 1 would implement mitigation measures to reduce potential impacts to sensitive plant and wildlife species and their habitats (MM BIO-1 through MM BIO-7).
Policy CE-G.1: Preserve natural habitats pursuant to the MSCP SAP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.	Consistent: Refer to the response to Goal G, Biological Diversity Goal.
H. Wetlands Goals: Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources. Preservation of all existing wetland habitat in San Diego through a "no net loss" approach.	Consistent: Refer to the response to Goal B, Open Space and Landform Preservation Goal. The CRMP Phase 1 would be consistent with all federal, state, and local regulations applicable to the protection of aquatic resources, including wetlands, to ensure no net loss of existing wetlands as a result of the CRMP Phase 1.
Policy CE-H.1: Use a watershed planning approach to preserve and enhance wetlands.	Consistent: Refer to the response to Goal H, Wetlands Goal.
Policy CE-H.7: Encourage site planning that maximizes the potential biological, historical, hydrological, and land use benefits of wetlands.	Consistent: Refer to the responses to Goal G, Biological Diversity Goal and Goal H, Wetlands Goal.
Recreation Element	
Policy RE-A.3: Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space.	Consistent**:** The CRMP Phase 1 proposes nature-based solutions to promote resilience, protect critical coastal habitats, and support coastal access. The CRMP Phase 1 would also retain existing recreational uses in the survey area.
Policy RE-C.1: Protect existing parklands and open space from unauthorized encroachment by adjacent development through appropriate enforcement measures.	Consistent**:** The CRMP Phase 1 would include appropriate enforcement measures to protect the existing and proposed open space areas and parklands and would be consistent with the City's Municipal Code.
Policy RE-C.4: Preserve all beaches for public-only purposes, including the protection of sensitive habitat and species.	Consistent**:** Refer to the response to Policy RE-A.3. The project would implement mitigation measures to reduce potential impacts to sensitive plant and wildlife species and their habitats (MM BIO-1 through MM BIO-7).
Policy RE-C.5: Design parks to preserve, enhance, and incorporate items of natural, cultural, or historic importance.	Consistent**:** Refer to the response to Policy RE-A.3.
Policy RE-C.7: Protect beaches and canyons from uncontrolled urban runoff.	Consistent: Refer to the response to General Plan Policy CE-B.4.

Table 8. Project Consistency Determination with City of San Diego General Plan Conservation and Recreation Elements

Goal/Policy	Project
Goal F. Open Space Lands and Resource-Based Parks Goals: An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety. Preservation of the natural terrain and drainage systems of San Diego's open space lands and resource-based parks.	Consistent**:** Refer to the responses to Policy RE-A.3 and General Plan Policy CE-B.4.
Policy RE-F.2: Provide for sensitive development of recreation uses within and adjacent to City-owned open space lands.	Consistent**:** Refer to the response to Policy RE-A.3.
Policy RE-F.4: Balance passive recreation needs of trail use with environmental preservation.	Consistent**:** Refer to the response to Policy RE-A.3. The CRMP Phase 1 would implement mitigation measures to reduce potential impacts to sensitive plant and wildlife species and their habitats (MM BIO-1 through MM BIO-7).
Policy RE-F.5: Utilize open space lands for outdoor recreation purposes, when doing so is compatible with cultural, historic preservation and MSCP conservation goals and surrounding land uses.	Consistent**:** Refer to the response to Policy RE-A.3.

Notes: BMP = best management practices; MSCP = Multiple Species Conservation Program; NPDES = National Pollutant Discharge Elimination System; RWQCB = Regional Water Quality Control Board; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan

Section 7 Impacts Analysis

7.1 Significance Thresholds and Definition of Impacts

Based on the CEQA Environmental Checklist (Appendix G of the CEQA Guidelines), direct or primary effects are those that are caused by a project and occur at the same time and place; indirect or secondary effects are those that are reasonably foreseeable and caused by a project but occur at a different time or place; and cumulative effects refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

The following thresholds are used in this document and are adapted from Appendix G of the CEQA Guidelines and the City's adopted Thresholds of Significance (City of San Diego 2022). Would the CRMP Phase 1:

1. Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program (MSCP), Vernal Pool Habitat Conservation Plan (VPHCP), or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS);
2. Result in a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS;
3. Result in a substantial adverse impact on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or
5. Conflict with the provisions of the MSCP, VPHCP, other adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA [Multi-Habitat Planning Area] that would result in adverse edge effects or introduce invasive species of plants into a natural open space area.

7.1.1 Direct Impacts

A direct impact is a physical change in the environment that is caused by and immediately related to the project. Construction and restoration activities associated with implementation of the CRMP Phase 1 could result in direct impacts to biological resources including but not limited to the following:

- Direct removal of vegetation and/or land cover during construction activities by means of excavation, demolition, grading, vegetation clearing/grubbing/crushing

- Placement of fill/sediment within jurisdictional aquatic resources, including the Pacific Ocean
- Dredging and/or hydrologic restoration activities in jurisdictional resources and encroachment into wetland buffers
- Human incursion into sensitive habitats
- Mortality of sensitive wildlife species from vehicular collision
- Destruction or abandonment of nests

Lands containing Tier I, II, IIIA, and IIIB (Table 3 of the Biology Guidelines) and all wetlands (Tables 2A and 2B of the Biology Guidelines) are considered sensitive and declining habitats (Table 9, Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources). As such, impacts to these resources would be significant, with two exceptions (City of San Diego 2018):

a. If the total proposed project upland impacts affect less than 0.1 acre, then they would not be considered significant and would not require mitigation.
b. Any proposed project impacts to non-native grasslands totaling less than 1.0 acre that are completely surrounded by urban development would not be considered significant and would not require mitigation.

Lands designated as Tier IV (e.g., developed land) are not considered to have significant habitat value, and any proposed impacts to these communities would not be considered significant.

Since the survey area is entirely within the COZ, any impacts to wetlands as part of the CRMP Phase 1 would be significant.

Table 9. Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources

Resource Type	Impact Threshold	Significance of Impact
Native Uplands (Tier I, II, IIIA, or IIIB)	Total less than 0.1 acre	Not significant
	Total 0.1 acre or greater	Significant, requires mitigation
Disturbed and Developed Land (Tier IV)	Any impacts	Not significant
Jurisdictional Waters	Any impacts within the COZ	Significant, requires mitigation
Wetlands	Any impact within the COZ	Significant, requires mitigation

Source: City of San Diego 2012a.
Notes: COZ = Coastal Overlay Zone

Impacts to individual sensitive plants species, aside from impacts to sensitive habitat, may also be considered significant based upon the rarity and extent of impacts. In general, conformance with the MSCP SAP provides incidental take coverage for covered species (both plants and wildlife) such that impacts to those species would not be considered significant (due to conservation of the species provided by MSCP SAP implementation). Exceptions to this would be impacts that occur to narrow endemic covered species, non-covered species that are state- or federally listed species and/or species identified in Biology Guidelines Section III B 1(d), Species Specific Mitigation (City

of San Diego 2018). It is assumed that if avoidance or minimization of impact is not feasible, any direct impacts to sensitive plant species that do not have incidental take coverage through the MSCP SAP could be mitigated either through habitat restoration, on-site preservation, and/or translocation of species in restored habitat that is within the MHPA boundary. Further, implementation of ASMDs for certain species covered under the MSCP SAP would be required as conditions of future project-level approval. Impacts to plant species ranked CRPR 3 and 4 would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist (i.e., CRPR 4 species are not considered "rare" from a statewide perspective) (Table 10, Significance of Potential Impacts to Sensitive Plant Species).

Table 10. Significance of Potential Impacts to Sensitive Plant Species

Species Rarity	Location of Species	Significance of Impact
MSCP SAP Covered Species	Any	Not significant
MSCP SAP Narrow Endemic	Any	Significant, requires mitigation
Species with Specific Mitigation per Biology Guidelines Section III B 1(d)	Any	Significant, requires mitigation
Federally or State Listed Non-MSCP SAP Covered Species	Any	Significant, requires mitigation
CRPR 1B.1, 1B.2, and 2B.2	Any	Significant, requires habitat-based mitigation
CRPR 3 and 4	Any	Not significant

Notes: CRPR = California Rare Plant Rank; MSCP = Multiple Species Conservation Program; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan

The City's Incidental Take Permit (ITP) 10(a) and NCCP Authorization in order to allow incidental "take" of covered species under the MSCP SAP is based upon approximately 90 percent of lands within the MHPA will be preserved. The project would limit activities within the MHPA to habitat protection and restoration activities and the treatment of invasive species in the City-owned sections of the preserve; these activities are compatible within the MHPA. Therefore, no MHPA boundary line adjustments are anticipated.

Habitat protection and restoration activities conducted in the survey area would be consistent with the requirements in the City's MSCP SAP, the Biology Guidelines, and ESL regulations for conducting such activities in wetlands and wetland buffers located in both the MHPA and COZ. Further, consistent with the MSCP SAP, the project would implement the ASMDs for species covered under the MSCP SAP that occur or have a moderate to high potential to occur in the survey area, as applicable. The project would also result in long-term direct benefits to wetland habitat and wildlife species that use these areas within and adjacent to the MHPA and COZ through the enhancement of nature-based coastal resiliency methods and enhancement of previously disturbed habitat along the coast. As demonstrated in Tables 5 and 6 (Sections 3.3.2 and 3.3.3), the CRMP Phase 1 would be consistent with the City's MSCP SAP, specifically Sections 1.5.1 and 1.5.2 of the

MSCP SAP regarding preservation and restoration of viable sensitive biological resources, including wildlife habitat.

7.1.2 Indirect Impacts

Indirect impacts are reasonably foreseeable effects caused by project implementation on remaining or adjacent biological resources outside a direct impact area, such as downstream and adverse edge effects. Indirect impacts include short-term effects immediately related to construction/installation activities and long-term or chronic effects occurring after construction. Indirect impacts that would result in loss of area or function of wetlands, Tier I–III upland vegetation habitats, or sensitive species may be considered significant.

Additional potential short-term indirect impacts to biological resources that could occur from the project are related to overall project construction activities and may include dust, construction-related noise, hydroacoustic effects, siltation, general human presence, changes within the survey area that affect forage and nesting, and construction-related soil erosion and runoff. Potential long-term indirect impacts to biological resources may also occur as a result of the project through adverse edge effects, including introduction of non-native species and increased human presence during construction. Since the project, specifically the Ocean Beach – Dog Beach project site and the survey buffer of the Sunset Cliffs project site, would be within and adjacent to the MHPA and could result in potential indirect impacts to the Pacific Ocean and connected habitats, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, Land Use Adjacency Guidelines. The project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). For typical development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained.

In accordance with the MSCP SAP and pursuant to the San Diego RWQCB Municipal Permit and the City's Stormwater Standards Manual (City of San Diego 2012b), projects are required to implement site design, source control, and treatment control best management practices (BMPs) to reduce potential indirect impacts to sensitive biological resources. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 3.3.2 and 3.3.3). Development projects are required to meet National Pollutant Discharge Elimination System (NPDES) regulations and incorporate BMPs during construction and permanent BMPs as defined by the City's Stormwater Standards Manual as part of project development.

7.1.3 Individual Project-Level Impacts Analysis

The individual projects, including the Pilot Project: Ocean Beach – Dog Beach, Sunset Cliffs, La Jolla Shores, Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park

Projects, are analyzed separately in Sections 7.2 through 7.7 of this report where the specific biological resources or potential impacts differ between project sites.

7.2 Threshold 1: Sensitive Plant and Wildlife Species

7.2.1 Guidelines for Determination of Significance

Significant impacts could result if the project had a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP SAP, VPHCP, or other local or regional plans, policies, or regulations or by the CDFW or USFWS.

7.2.2 Impact Analysis

No vernal pools were observed in the survey areas for any of the individual project sites. Therefore, none of the CRMP Phase 1 projects are subject to the VPHCP. No impacts would occur to vernal pools or associated plant and wildlife species. The analyses below describe the potential for direct and indirect impacts to sensitive plant and wildlife species identified in the MSCP, other plans, policies, and regulations and by the CDFW and USFWS.

7.2.2.1 Sensitive Plant Species

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

As discussed in Section 4.3, Survey Limitations, no focused sensitive plant species surveys were conducted in the survey area during the 2023 surveys. Two sensitive plant species, Nuttall's acmispon and southwestern spiny rush, were observed in the Diegan coastal sage scrub in the eastern portion of the Ocean Beach – Dog Beach survey area during the biological surveys (Figure 9). Nuttall's acmispon is a CRPR 1B.1 species but not designated as narrow endemic or covered under the MSCP SAP. Southwestern spiny rush is a CRPR 4.2 species and not designated as narrow endemic or covered under the MSCP SAP. As discussed in Section 7.1.1, Direct Impacts, and Table 10, impacts to plant species ranked CRPR 4, not considered "rare" from a statewide perspective, would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist. Therefore, potential impacts to southwestern spiny rush from implementation of the project would be considered less than significant, and no mitigation is required.

Based on the literature and database review, 12 additional sensitive plant species, Aphanisma, California box-thorn, coast wallflower, coast woolly-heads, Coulter's goldfields, decumbent goldenbush, estuary seablite, red sand-verbena, salt marsh bird's-beak, San Diego marsh-elder, San Diego barrel cactus, and south coast saltbush, were determined to have a moderate or high potential

to occur in the Ocean Beach – Dog Beach survey area but were not observed during the biological resources surveys as summarized in Table 4 (Section 5.4) and described in Section 5.4.3.

Of these species, Aphanisma, coast wallflower, salt marsh bird's-beak, and San Diego barrel cactus are covered under the MSCP SAP, but are not designated as narrow endemic species. The MSCP SAP requires ASMDs for two of these species, including salt marsh bird's-beak and San Diego barrel cactus are covered under the MSCP SAP, and ASMDs are required for these species. Implementation of the ASMDs for salt marsh bird's-beak and San Diego barrel cactus, which were determined to have high and moderate potentials to occur in the survey area, respectively, would be required as a condition of future project-level approval. Further, in the event salt marsh birds-beak and San Diego barrel cactus cannot be avoided, translocation and/or see collection of impacted individuals into the proposed sand dune and Diegan coastal sage scrub restoration areas would be incorporated into future project-specific restoration plan designs. The Pilot Project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, with conformance with the MSCP SAP and the applicable species-specific ASMDs, as described in in Tables 5 and 6 (Sections 6.1.1 and 6.1.2), direct impacts to the four MSCP SAP covered sensitive plant species would be less than significant, and no species-specific mitigation is required, although habitat based compensatory mitigation may be required based on subsequent site-specific analysis of future project-level impacts.

In addition, California box-thorn and red sand-verbena were documented in the western and northern portions of Smiley Lagoon, respectively, during City biological resources surveys conducted in 2023 and determined to have a high potential to occur, but were not located during the 2023 Harris surveys (Figures 8 and 8a). California box-thorn and red sand-verbena are CRPR 4.2 species and not designated as narrow endemic or covered under the MSCP SAP. Similar to southwestern spiny rush discussed in the previously in this subsection, impacts to plant species ranked CRPR 4 would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist. Therefore, potential impacts to California box-thorn and red sand-verbena from implementation of the project would be considered less than significant, and no mitigation is required.

Potential direct impacts could occur to the one sensitive plant species observed, Nuttall's acmispon, and remaining six sensitive plant species determined to have moderate or high potentials to occur in the Ocean Beach – Dog Beach survey area, including CRPR 1B.1, 1B.2, and 2B.2 species were determined to have moderate or high potentials to occur in the Ocean Beach – Dog Beach survey area, including coast wallflower, coast woolly-heads, Coulter's goldfields, decumbent goldenbush, estuary seablite, San Diego marsh-elder, and south coast saltbush. These seven plants are CRPR 1B.1, 1B.2, and 2B.2 species, but none are covered under the MSCP SAP. In the event any of the seven sensitive plant species observed and with moderate or high potentials to occur are identified

within the Ocean Beach – Dog Beach project site potential impact area during future project-specific surveys, direct impacts are considered potentially significant without mitigation.

An analysis of the exact acreage of impacts that would occur to these sensitive plant species in the Ocean Beach – Dog Beach project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pilot Project in accordance with the City's ESL Regulations, Biological Guidelines, and MSCP SAP, and any impacts to sensitive plant species would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pilot Project.

Indirect Impacts

Temporary indirect impacts to sensitive plant species could result during construction of the Pilot Project, and may include dust, which could disrupt plant vitality in the short term, or construction-related soil erosion and runoff. Permanent edge effects could result during operation of the project and may include intrusions by humans and therefore possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). As discussed previously in Section 7.1.2, Indirect Impacts, the Pilot Project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Ocean Beach – Dog Beach project site is within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, the projects would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The projects' consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Indirect impacts to MSCP covered species would be precluded by conformance with Section 1.4.3, Land Use Adjacency Guidelines; and implementing Section 1.5, Preserve Management Recommendations of the City's MSCP Subarea Plan. Therefore, indirect impacts to sensitive plants during construction activities and operation of the Pilot Project are less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct and Indirect Impacts

No sensitive plant species were observed in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas during the 2023 biological reconnaissance surveys, and no additional sensitive plant

species were determined to have a high potential to occur in the survey areas (Table 4 and Sections 5.4.2 and 5.4.3). While no focused rare plant surveys were conducted in the survey areas, the La Jolla Shores, Mission Beach, and Ocean Beach – Pier project sites and potential impact areas are composed of developed land and unvegetated beach that have a low potential to support sensitive plant species. Therefore, direct and indirect impacts to sensitive plant species would be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct and Indirect Impacts

No sensitive plant species were observed in the Pacific Beach – Tourmaline Surf Park survey area during the 2023 biological reconnaissance surveys, and no additional sensitive plant species were determined to have a high potential to occur in the Pacific Beach – Tourmaline Surf Park survey area (Table 4 and Sections 5.4.2 and 5.4.3). While no focused rare plant surveys were conducted in the survey area, most of the Pacific Beach – Tourmaline Surf Park project site and potential impact area are composed of developed land, sandstone cliffs, and unvegetated beach that have a low potential to support sensitive plant species. Therefore, direct and indirect impacts to sensitive plant species would be less than significant, and no mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

One large patch of California box-thorn was observed on the sandstone cliffs along the walking path in the southern portion of the Sunset Cliffs project site during the biological surveys (Figure 9). California box-thorn is a CRPR 4.2 species and not designated as narrow endemic or covered under the MSCP SAP. As discussed in Section 7.1.1, Direct Impacts, and Table 10, impacts to plant species ranked CRPR 4, not considered "rare" from a statewide perspective, would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist. Therefore, potential direct impacts to California box-thorn from implementation of the project would be considered less than significant, and no mitigation is required.

While no focused rare plant surveys were conducted in the Sunset Cliffs survey area, no other sensitive plant species were determined to have a high potential to occur in the survey area (Table 4 and Section 5.4.5). Further, the Sunset Cliffs project site and potential impact area are entirely within the developed land, which has a low potential to support sensitive plant species. In addition, because the Sunset Cliffs project site is adjacent to the MHPA and could result in potential indirect impacts to the preserve, the projects would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The projects' consistency with the MHPA LUAGs is demonstrated in

Table 7 (Section 6.1.3). Therefore, direct and indirect impacts to sensitive plant species would be less than significant, and no mitigation is required.

7.2.2.2 Sensitive Wildlife Species

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

The sensitive wildlife species that were observed in the Ocean Beach – Dog Beach survey area during the 2023 surveys and the sensitive wildlife species that were determined to have a moderate or high potential to occur in the Ocean Beach – Dog Beach survey area are described in Sections 5.4.4, Sensitive Wildlife Species Observed, and 5.4.5, Sensitive Wildlife Species Not Observed With a High Potential to Occur (Figures 9, 8, and 8d). The two sensitive wildlife species observed in the survey area include the following: Belding's savannah sparrow and monarch butterfly. In addition, 17 sensitive wildlife species were not observed in the Ocean Beach – Dog Beach survey area but determined to have a moderate or high potential to occur in the survey area include the following: American peregrine falcon, Belding's orange-throated whiptail, black tern, California brown pelican, California least tern, Cooper's hawk, Costa's hummingbird, double-crested cormorant, elegant tern, light-footed Ridgway's rail, Mexican long-tongued bat, northern harrier, northwestern San Diego pocket mouse, osprey, reddish egret, San Diegan legless lizard, and wandering skipper. Two additional species, Caspian tern and long-billed curlew, were observed foraging in the Sunset Cliffs survey area; however, these species also have a high potential to forage in the salt marsh and estuarine habitat in the eastern portion of the Ocean Beach – Dog Beach survey area although they were not observed during the 2023 surveys. The Pilot Project has the potential to directly impact these 21 sensitive wildlife species during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of their habitat. Implementation of the project could result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of the sensitive wildlife species observed or with a high potential to occur in the Ocean Beach – Dog Beach survey area described in Sections 5.4.4 and 5.4.5.

Of these 21 sensitive wildlife species observed or determined to have a moderate or high potential to occur, 12 are covered by the MSCP SAP. These species include American peregrine falcon, Belding's orange-throated whiptail, Belding's savannah sparrow, California brown pelican, California least tern, Cooper's hawk, elegant tern, light-footed Ridgway's rail, long-billed curlew, northern harrier, reddish egret, and wandering skipper. As described in Section 5.4.4, the MSCP SAP requires ASMDs for eight of the 12 sensitive wildlife species covered under the plan. ASMDs are provided for Belding's orange-throated whiptail, Belding's savannah sparrow, California least tern, Cooper's hawk, elegant tern, light-footed Ridgway's rail, northern harrier, and wandering skipper, however, none are required for American peregrine falcon, California brown pelican, long-billed curlew, and reddish

egret (City of San Diego 1997). Implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the survey area would be required as a condition of future project-level approval. The Pilot Project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, with conformance with the MSCP SAP and the applicable species-specific ASMDs as described in in Tables 5 and 6 (Sections 6.1.1 and 6.1.2), direct impacts to these 12 MSCP SAP covered sensitive wildlife species would be less than significant, and no species-specific mitigation is required, although habitat based compensatory mitigation may be required based on subsequent site-specific analysis of future project-level impacts.

Potential direct impacts could occur to the remaining sensitive wildlife species observed, monarch butterfly, and eight sensitive wildlife species determined to have a moderate or high potential to occur in the Ocean Beach – Dog Beach survey area, including black tern, Costa's hummingbird, double-crested cormorant, Mexican long-tongued bat, northwestern San Diego pocket mouse, osprey, San Diegan legless lizard, Caspian tern, which are not covered by the MSCP SAP. In the event any of the nine sensitive wildlife species observed and with moderate or high potentials to occur are identified within the Ocean Beach – Dog Beach project site potential impact area during future project-specific surveys, direct impacts are considered potentially significant without mitigation.

An analysis of the exact acreage of impacts that would occur to these sensitive wildlife species in the form of habitat removal in the survey area as a result of the Pilot Project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pilot Project. The programmatic-level analysis of impacts to the nine non-MSCP SAP covered species observed and with moderate or high potential to occur is provided in the paragraphs below.

Aquatic and wetland vegetation communities and land cover types, including subtidal ocean, estuarine, southern coastal salt marsh, and beach, occur in the Ocean Beach – Dog Beach survey area (Figures 6 and 6a; Table 2a). These aquatic communities provide suitable nesting and foraging habitat for sensitive bird species (not covered by the MSCP SAP) observed or with a high potential to occur in these habitats in the survey area. These sensitive species include black tern, Caspian tern, double-crested cormorant, elegant tern, long-billed curlew, and osprey. Direct impacts to estuarine, southern coastal salt marsh, and beach communities, that occur in the Ocean Beach – Dog Beach survey area could result in direct impacts to these sensitive birds in the form of permanent and temporary habitat loss. Potential future site-specific impacts to these sensitive wildlife species would be potentially significant without mitigation.

Although the vegetated upland habitats, including southern foredunes and disturbed Diegan coastal sage scrub in the Ocean Beach – Dog Beach survey area, may be limited or low quality, these communities provide suitable foraging and nesting habitat for sensitive Costa's hummingbird, which was determined to have a high potential to occur in the survey area. The disturbed Diegan coastal sage scrub in the Ocean Beach – Dog Beach survey area also provides suitable habitat for Northwestern San Diego pocket mouse and San Diegan legless lizard, which were determined to have moderate potential to occur in the survey area. Further, these habitats are connected to larger areas of contiguous habitat to the northeast into Smiley Lagoon. Direct impacts to disturbed southern foredunes and disturbed Diegan coastal sage scrub could result in direct impacts to the sensitive Costa's hummingbird, Northwestern San Diego pocket mouse, and San Diegan legless lizard in the form of permanent and temporary habitat loss. Potential impacts to these sensitive wildlife species would be potentially significant without mitigation.

The developed land in the southern portion of the Ocean Beach – Dog Beach survey area provides little to no suitable foraging or nesting habitat value for most of the sensitive species observed or with a high potential to occur in the survey area. However, a large number of flowering ornamental trees and shrubs, as well as mature eucalyptus and pine trees, are present within and along the edges of the developed land that could provide suitable foraging habitat for Costa's hummingbird and both foraging and overwintering habitat monarch butterfly. Direct impacts to the ornamental trees and shrubs in the developed land of the survey area could result in direct impacts to Costa's hummingbird and monarch butterfly in the form of permanent and temporary foraging and overwintering habitat loss, respectively. In addition, the buildings and other structures present in the developed land throughout the Ocean Beach – Dog Beach survey area could provide suitable bat roosting habitat, specifically for Mexican long-tongued, bat which was determined to have a high potential to occur in the survey area. As described in Section 2.2, Project Description, the developed land uses currently in the survey area, primarily residential and commercial, would remain in place, and no impacts to Mexican long-tongued bats would result to the potential foraging, roosting, and overwintering habitat provided within those areas. As discussed in Section 3, the project is required to comply with all federal, state, and local regulations applicable to biological resources as a condition of future project-level approval. Compliance is ensured through conditions of subsequent project-level approval. Therefore, potential impacts to these sensitive wildlife species described above and in Table 4 would be less than significant, and no mitigation is required.

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens [*Corvus corax*], coyotes [*Canis latrans*], domestic dogs [*Canis*

familiaris], raccoons [*Procyon lotor*], and striped skunks [*Mephitis mephitis*]). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species observed or determined to have a high potential to occur in the Ocean Beach – Dog Beach survey area, identified in Sections 5.4.4 and 5.4.5 and discussed under Direct Impacts. As previously discussed in Section 7.1.2, Indirect Impacts, the Pilot Project and subsequent project-level approvals would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.2.1). In addition, because the Ocean Beach – Dog Beach project site is within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, the project would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Indirect impacts to MSCP covered species would be precluded by conformance to MSCP Section 1.4.3, Land Use Adjacency Guidelines; and implementing Section 1.5, Preserve Management Recommendations of the City's MSCP Subarea Plan. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the Pilot Project would be less than significant, and no mitigation is required.

Nesting Birds

The Ocean Beach – Dog Beach survey area provides suitable nesting habitat for sensitive birds protected under the CFGC and MBTA. Focused nest surveys were not conducted due to the programmatic nature of the project, and no active nests or nesting behavior were observed during the biological surveys conducted.

As previously discussed under Section 7.1.1, the Pilot Project would be required to comply with regulations protecting sensitive nesting birds, including the CFGC and MBTA. Compliance is ensured though conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential direct impacts to these sensitive wildlife species are considered potentially significant without mitigation.

Sensitive Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including Mexican long-tongued bat, hoary bat, and western mastiff bat, occurs in the structures and ornamental vegetation within the developed land throughout the eastern portion of the Ocean Beach – Dog Beach survey area. Although roosting bats were not observed during the biological surveys, the availability of suitable roosting with nearby foraging habitat suggest roosting is likely occurring in the survey area (Table 4 and Section 5.4.5.9). No focused nighttime mist-netting or acoustic surveys were

conducted. As described in Section 2.1, the developed land uses currently in the Ocean Beach – Dog Beach survey area would remain in place, and no impacts would result to the potential roosting habitat provided by the trees or structures in those areas. Therefore, potential impacts to these sensitive roosting bats would be less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct Impacts

No sensitive wildlife species were observed in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas during the 2023 biological reconnaissance surveys. However, 15 sensitive wildlife species were determined to have a high potential to occur in the survey areas (Table 4 and Section 5.4.5). These sensitive wildlife species include American peregrine falcon, black tern, California brown pelican, California least tern, California sea lion, Caspian tern, Cooper's hawk, double-crested cormorant, elegant tern, long-billed curlew, Mexican long-tongued bat, monarch butterfly, northern harrier, osprey, and reddish egret. No sensitive wildlife species were determined to have a moderate potential to occur in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas. Implementation of these future projects could result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of these sensitive wildlife species with a high potential to occur in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas.

Of these 15 sensitive wildlife species determined to have a moderate or high potential to occur, eight are covered by the MSCP SAP (Table 4 and Section 5.4.5). These species are American peregrine falcon, California brown pelican, California least tern, Cooper's hawk, elegant tern, long-billed curlew, northern harrier, and reddish egret. As described in Section 5.4.4, the MSCP SAP requires ASMDs for four of the eight sensitive wildlife species covered under the plan. ASMDs are provided for California least tern, Cooper's hawk, elegant tern, and northern harrier; however, none are required for American peregrine falcon, California brown pelican, long-billed curlew, and reddish egret (City of San Diego 1997). Implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the survey area would be required as a condition of future project-level approval. The projects' consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, with conformance with the MSCP SAP and the species-specific ASMDs as applicable, direct impacts to these eight MSCP SAP covered sensitive wildlife species would be less than significant, and no mitigation is required.

Similarly, California sea lion is a MMPA fully protected species, and MMPA does not allow take of any marine mammal species found in U.S. waters. As a condition of future project-level approval, the project would be required to avoid impacts to this species consistent with MMPA. Therefore, with

conformance with MMPA, direct impacts to California sea lion would be less than significant, and no mitigation is required.

Potential direct impacts to the remaining six sensitive wildlife species determined to have a high potential to occur in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas that are not covered by the MSCP SAP or protected under federal regulations are discussed below. An analysis of the exact acreage of impacts that would occur to these sensitive wildlife species from potential removal of habitat in the survey area as a result of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects.

Aquatic and wetland vegetation communities and land cover types, including subtidal ocean and beach, occur in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas (Figures 6, 6b, 6d, and 6e; Table 2a). These aquatic communities provide suitable foraging habitat for sensitive bird and raptor species (not covered by the MSCP SAP) determined to have a high potential to occur in these habitats in the survey areas. These sensitive species include black tern, Caspian tern, double-crested cormorant, and osprey. Direct impacts to subtidal ocean are not anticipated during implementation of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects, reducing potential impacts to foraging habitat for double-crested cormorant and osprey to less than significant. However, direct impacts to the beach that occurs in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier project sites could result in direct impacts to black tern and Caspian tern, which could use the beach while foraging. Potential impacts to these sensitive wildlife species in the form of foraging habitat loss would be potentially significant without mitigation.

The developed land in the eastern portions of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas provide little to no suitable habitat value for most of the sensitive species determined to have a high potential to occur in the survey area. However, a large number of flowering ornamental trees and shrubs, as well as mature eucalyptus and pine trees, are present within and along the edges of the developed land that could provide suitable foraging and overwintering habitat monarch butterfly. Direct impacts to the ornamental trees and shrubs in the developed land of the survey areas could result in direct impacts to monarch butterfly in the form of permanent and temporary foraging and overwintering habitat loss. In addition, the ornamental plants, buildings, and other structures present in the developed land of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas could provide suitable bat foraging and roosting habitat, specifically for Mexican long-tongued bat, which was determined to have a high potential to occur in the survey areas. As described in Section 2.2, Project Description, the developed land uses currently in the

survey areas, primarily residential and commercial, would remain in place, and no impacts would result to the potential foraging, roosting, and overwintering habitat provided for Mexican long-tongued bat within those areas. As discussed in Section 3, the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects are required to comply with all federal, state, and local regulations applicable to biological resources as a condition of approval. Compliance is ensured through conditions of subsequent project-level approval. Therefore, potential impacts to these sensitive wildlife species would be less than significant, and no mitigation is required.

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens, coyotes, domestic dogs, raccoons, and striped skunks). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species determined to have a high potential to occur in the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas, discussed under Direct Impacts. As previously discussed in Section 7.1.2, Indirect Impacts, the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects and subsequent project-level approvals would be required to be in compliance with the ESL Regulations, Biology Guidelines, MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The La Jolla Shores, Mission Beach, and Ocean Beach – Pier project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Indirect impacts to MSCP covered species would be precluded by conformance to MSCP Section 1.4.3, Land Use Adjacency Guidelines; and implementing Section 1.5, Preserve Management Recommendations of the City's MSCP Subarea Plan. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier project would be less than significant, and no mitigation is required.

Nesting Birds

The La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas provide suitable nesting habitat for sensitive birds protected under the CFGC and MBTA. Focused nest surveys were not conducted due to the programmatic nature of the projects, and no active nests or nesting behavior were observed during the biological surveys conducted.

As previously discussed under Section 7.1.1, the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects would be required to implement regulations protecting sensitive nesting birds,

including the CFGC and MBTA. Compliance is ensured though conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential direct and indirect impacts to these sensitive wildlife species are considered potentially significant without mitigation.

Sensitive Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including Mexican long-tongued bat, hoary bat, western mastiff bat, occurs in the structures and ornamental trees within the developed land in the eastern portion of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier survey areas. Although roosting bats were not observed during the biological surveys, the availability of suitable roosting with nearby foraging habitat suggest roosting is likely occurring in the survey areas. No focused nighttime mist-netting or acoustic surveys were conducted. As described in Section 2.2, the developed land uses currently in the survey areas would remain in place, and no impacts would result to the potential roosting habitat provided by the trees or structures in those areas. Therefore, potential direct and indirect impacts to these sensitive roosting bats would be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

No sensitive wildlife species were observed in the Pacific Beach – Tourmaline Surf Park survey area during the 2023 biological reconnaissance surveys (Table 4 and Section 5.4.4). However, 15 sensitive wildlife species were determined to have a high potential to occur in the Pacific Beach – Tourmaline Surf Park survey area (Table 4 and Section 5.4.5). These sensitive wildlife species include American peregrine falcon, black tern, California brown pelican, California least tern, California sea lion, Caspian tern, Cooper's hawk, double-crested cormorant, elegant tern, long-billed curlew, Mexican long-tongued bat, monarch butterfly, northern harrier, osprey, and reddish egret. Implementation of the project could result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of these sensitive wildlife species with a high potential to occur in the Pacific Beach – Tourmaline Surf Park survey area.

Of these 15 sensitive wildlife species determined to have a high potential to occur, eight are covered by the MSCP SAP (Table 4 and Section 5.4.5). These species are American peregrine falcon, California brown pelican, California least tern, Cooper's hawk, elegant tern, long-billed curlew, northern harrier, and reddish egret. As described in Section 5.4.4, the MSCP SAP requires ASMDs for four of the eight sensitive wildlife species covered under the plan. ASMDs are provided for California least tern, Cooper's hawk, elegant tern, and northern harrier, however, none are required for American peregrine falcon, California brown pelican, long-billed curlew, and reddish egret (City of San Diego 1997). Implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the survey area would be required as a condition of future project-level approval.

The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, with conformance with the MSCP SAP and the species-specific ASMDs as applicable, direct impacts to these eight MSCP SAP covered sensitive wildlife species would be less than significant, and no mitigation is required.

Similarly, California sea lion is a MMPA fully protected species, and MMPA does not allow take of any marine mammal species found in U.S. waters. As a condition of future project-level approval, the project would be required to avoid impacts to this species consistent with MMPA. Therefore, with conformance with MMPA, direct impacts to California sea lion would be less than significant, and no mitigation is required.

Potential direct impacts to the remaining six sensitive wildlife species determined to have a high potential to occur in the Pacific Beach – Tourmaline Surf Park survey area that are not covered by the MSCP SAP or protected under federal regulations are discussed below. An analysis of the exact acreage of impacts that would occur to these sensitive wildlife species from potential removal of habitat in the survey area as a result of the Pacific Beach – Tourmaline Surf Park project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pacific Beach – Tourmaline Surf Park project during the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pacific Beach – Tourmaline Surf Park project.

Aquatic and wetland vegetation communities and land cover types, including subtidal ocean, concrete-channel, and beach, occur in the Pacific Beach – Tourmaline Surf Park survey area (Figures 6 and 6c; Table 2a). While concrete-channel provides little habitat value, the subtidal ocean and beach communities provide suitable foraging habitat for sensitive bird and raptor species (not covered by the MSCP SAP) determined to have a high potential to occur in the survey area. These sensitive species include black tern, Caspian tern, double-crested cormorant, and osprey. Direct impacts to subtidal ocean are not anticipated during implementation of the Pacific Beach – Tourmaline Surf Park project, reducing potential impacts to foraging habitat for double-crested cormorant and osprey to less than significant. However, direct impacts to the beach that occurs in the Pacific Beach – Tourmaline Surf Park project site could result in direct impacts to black tern and Caspian tern, which could use the beach while foraging. Potential impacts to these sensitive wildlife species in the form of foraging habitat loss would be potentially significant without mitigation.

The non-native woodland and developed land in the eastern portion of the Pacific Beach – Tourmaline Surf Park survey area provides little to no suitable habitat value for most of the sensitive

species determined to have a high potential to occur in the survey area. However, a large number of flowering non-native and ornamental trees and shrubs, as well as mature eucalyptus and pine trees, are present within the non-native woodland and developed land that could provide suitable foraging and overwintering habitat monarch butterfly. Direct impacts to the non-native and ornamental trees and shrubs in the non-native woodland and developed land of the survey area could result in direct impacts to monarch butterfly in the form of permanent and temporary foraging and overwintering habitat loss. In addition, the ornamental plants, buildings, and other structures present in the developed land of the Pacific Beach – Tourmaline Surf Park survey area could provide suitable bat foraging and roosting habitat, specifically for Mexican long-tongued bat, which was determined to have a high potential to occur in the survey area. As described in Section 2.2, Project Description, the developed land uses currently in the survey area, primarily residential and commercial, would remain in place, and no impacts would result to the potential foraging, roosting, and overwintering habitat provided within those areas. As discussed in Section 3, the Pacific Beach – Tourmaline Surf Park project is required to comply with all federal, state, and local regulations applicable to biological resources as a condition of approval. Implementation is ensured through conditions of subsequent project-level approval. Therefore, potential impacts to these sensitive wildlife species would be less than significant, and no mitigation is required.

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens, coyotes, domestic dogs, raccoons, and striped skunks). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species determined to have a high potential to occur in the Pacific Beach – Tourmaline Surf Park survey area, discussed under Direct Impacts. As previously discussed in Section 7.1.2, Indirect Impacts, the Pacific Beach – Tourmaline Surf Park project and subsequent project-level approvals would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.2.1). Indirect impacts to MSCP covered species would be precluded by conformance to MSCP Section 1.4.3, Land Use Adjacency Guidelines; and implementing Section 1.5, Preserve Management Recommendations of the City's MSCP Subarea Plan. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the Pacific Beach – Tourmaline Surf Park project would be less than significant, and no mitigation is required.

Nesting Birds

The Pacific Beach – Tourmaline Surf Park survey area provides suitable nesting habitat for sensitive birds protected under the CFGC and MBTA. Focused nest surveys were not conducted due to the programmatic nature of the project, and no active nests or nesting behavior were observed during the biological surveys conducted.

As previously discussed under Section 7.1.1, the Pacific Beach – Tourmaline Surf Park project would be required to implement regulations protecting sensitive nesting birds, including the CFGC and MBTA. Implementation is ensured though conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential direct impacts to these sensitive wildlife species are considered potentially significant without mitigation.

Sensitive Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including Mexican long-tongued bat, hoary bat, western mastiff bat, occurs in the structures and ornamental trees within the developed land in the eastern portion of the Pacific Beach – Tourmaline Surf Park survey area. Although roosting bats were not observed during the biological surveys, the availability of suitable roosting with nearby foraging habitat suggest roosting is likely occurring in the survey area. No focused nighttime mist-netting or acoustic surveys were conducted. As described in Section 2.2, the developed land uses currently in the survey area would remain in place, and no impacts would result to the potential bat roosting habitat provided by the trees or structures in those areas. Therefore, potential impacts to these sensitive roosting bats would be less than significant, and no mitigation is required.

Sunset Cliffs

Direct Impacts

The five sensitive wildlife species that were observed in the Sunset Cliffs survey area during 2023 surveys and the nine sensitive wildlife species that were determined to have a high potential to occur in the Sunset Cliffs survey area are described in Sections 5.4.4, Sensitive Wildlife Species Observed, and 5.4.5, Sensitive Wildlife Species Not Observed With a High Potential to Occur (Figures 9, 8, 8f, and 8g). The five sensitive wildlife species observed in the Sunset Cliffs survey area include the following: California brown pelican, California sea lion, Caspian tern, double-crested cormorant, and long-billed curlew. In addition, nine sensitive wildlife species that were not observed but determined to have a high potential to occur in the survey area include the following: American peregrine falcon, black tern, California least tern, Cooper's hawk, elegant tern, Mexican long-tongued bat, northern harrier, osprey, and reddish egret (Table 4 and Section 5.4.5). The Sunset Cliffs project has the potential to directly impact these species during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of

their habitat. Implementation of the project could result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of the sensitive wildlife species observed or with a high potential to occur in the Sunset Cliffs survey area described in Sections 5.4.4 and 5.4.5.

Of these 14 sensitive wildlife species observed or determined to have a high potential to occur, eight are covered by the MSCP SAP (Table 4 and Sections 5.4.4 and 5.4.5). These species are American peregrine falcon, California brown pelican, California least tern, Cooper's hawk, elegant tern, long-billed curlew, northern harrier, and reddish egret. As described in Section 5.4.4, the MSCP SAP requires ASMDs for four of the eight sensitive wildlife species covered under the plan. ASMDs are provided for California least tern, Cooper's hawk, elegant tern, and northern harrier, however, none are required for American peregrine falcon, California brown pelican, long-billed curlew, and reddish egret (City of San Diego 1997). Implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the survey area would be required as a condition of future project-level approval. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, with conformance with the MSCP SAP and the species-specific ASMDs as applicable, direct impacts to these eight MSCP SAP covered sensitive wildlife species would be less than significant, and no mitigation is required.

Similarly, California sea lion is a MMPA fully protected species, and MMPA does not allow take of any marine mammal species found in U.S. waters. As a condition of future project-level approval, the Sunset Cliffs project would be required to avoid impacts to this species consistent with MMPA. Therefore, with conformance with MMPA, direct impacts to California sea lion would be less than significant, and no mitigation is required.

Potential direct impacts to the remaining six sensitive wildlife species determined to have a high potential to occur in the Sunset Cliffs survey area that are not covered by the MSCP SAP or protected under federal regulations are discussed below. An analysis of the exact acreage of impacts that would occur to these sensitive wildlife species from potential removal of habitat in the survey area as a result of the Sunset Cliffs project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of project-level approval prior to the implementation of the Sunset Cliffs project.

Aquatic and wetland vegetation communities and land cover types, including intertidal ocean, subtidal ocean, and beach, occur in the Sunset Cliffs survey area (Figures 6, 6f, and 6g; Table 2a). These aquatic communities provide suitable foraging habitat for sensitive bird and raptor species (not covered

by the MSCP SAP) observed or determined to have a high potential to occur in these habitats in the survey area. Further, the sandstone cliffs within the survey area could provide perching and resting habitat for double-crested cormorant. These sensitive species include black tern, Caspian tern, double-crested cormorant, and osprey. Direct impacts outside of the developed land, including to the intertidal ocean, subtidal ocean, sandstone cliff, and beach communities, are not anticipated during implementation of the Sunset Cliffs project, reducing potential impacts to foraging habitat for these four species to less than significant. Therefore, potential impacts to these sensitive wildlife species in the form of foraging habitat loss would be less than significant, and no mitigation is required.

The developed land in the eastern portion of the Sunset Cliffs survey area provides little to no suitable habitat value for most of the sensitive species observed or determined to have a high potential to occur in the survey area. However, a large number of flowering ornamental trees and shrubs, as well as mature eucalyptus and pine trees, are present within and along the edges of the developed land that could provide suitable foraging and overwintering habitat monarch butterfly. Direct impacts to the ornamental trees and shrubs in the developed land of the survey area could result in direct impacts to monarch butterfly in the form of permanent and temporary foraging and overwintering habitat loss. In addition, the ornamental plants, buildings, and other structures present in the developed land of the Sunset Cliffs survey area could provide suitable bat foraging and roosting habitat, specifically for Mexican long-tongued, bat which was determined to have a high potential to occur in the survey area. As described in Section 2.2, Project Description, the developed land uses currently in the survey area, primarily residential and commercial, would remain in place, and no impacts would result to the potential foraging, roosting, and overwintering habitat provided within those areas. As discussed in Section 3, the Sunset Cliffs project is required to comply with all federal, state, and local regulations applicable to biological resources as a condition of approval. Implementation is ensured through conditions of subsequent project-level approval. Therefore, potential impacts to these sensitive wildlife species would be less than significant, and no mitigation is required.

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens, coyotes, domestic dog, raccoons, and striped skunks). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species observed or determined to have a high potential to occur in the Sunset Cliffs survey area, identified in Sections 5.4.4 and 5.4.5 and discussed under Direct Impacts. As previously discussed in Section 7.1.2, Indirect Impacts, the Sunset Cliffs project and subsequent project-level approvals would be required to be in compliance with the MSCP SAP,

the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 3.3.2 and 3.3.3). In addition, because the Sunset Cliffs project site is adjacent to the MHPA and could result in potential indirect impacts to the preserve, the project would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Indirect impacts to MSCP covered species would be precluded by conformance to MSCP Section 1.4.3, Land Use Adjacency Guidelines; and implementing Section 1.5, Preserve Management Recommendations of the City's MSCP Subarea Plan. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the Sunset Cliffs project would be less than significant, and no mitigation is required.

Nesting Birds

The Sunset Cliffs survey area provides suitable nesting habitat for sensitive birds protected under the CFGC and MBTA. Focused nest surveys were not conducted due to the programmatic nature of the project, and no active nests or nesting behavior were observed during the biological surveys conducted.

As previously discussed under Section 7.1.1, the Sunset Cliffs project would be required to implement regulations protecting sensitive nesting birds, including the CFGC and MBTA. Implementation is ensured though conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential indirect impacts to these sensitive wildlife species are considered potentially significant without mitigation.

Sensitive Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including Mexican long-tongued bat, hoary bat, western mastiff bat, occurs in the structures and ornamental trees within the developed land throughout the eastern portion of the Sunset Cliffs survey area. Although roosting bats were not observed during the biological surveys, the availability of suitable roosting with nearby foraging habitat suggest roosting is likely occurring in the survey area. No focused nighttime mist-netting or acoustic surveys were conducted. As described in Section 2.2, the developed land uses currently in the Sunset Cliffs survey area would remain in place, and no impacts would result to the potential roosting habitat provided by the trees or structures in those areas. Therefore, potential impacts to these sensitive roosting bats would be less than significant, and no mitigation is required.

7.2.3 Mitigation Measures

7.2.3.1 Sensitive Plant Species

Pilot Project: Ocean Beach – Dog Beach

In the event the seven sensitive plant species observed or with moderate or high potential to occur in the Ocean Beach – Dog Beach survey area, Nuttall's acmispon, coast woolly-heads, Coulter's goldfields, decumbent goldenbush, estuary seablite, San Diego marsh-elder, and south coast saltbush, or other sensitive plant species are identified within the potential impact area, including MSCP SAP covered and narrow endemic plant species, non-MSCP SAP covered federally and/or state-listed plant species, or non-MSCP SAP covered CRPR 1B.1, 1B.2, or 2B.2 species, potential impacts are considered potentially significant without mitigation. Implementation of Mitigation Measure BIO-1, Focused Sensitive Plant Species Surveys, would reduce potential direct impacts to sensitive plant species by requiring that subsequent project-level evaluations and focused surveys be conducted prior to any construction associated with the Pilot Project.

Direct Impacts

Significant direct impacts could occur to any sensitive plant species not identified in the project impact areas during project construction in the species' suitable habitat. Implementation of Mitigation Measure BIO-1 would reduce potential indirect impacts to sensitive plant species through conducting sensitive plant species focused surveys prior to construction of the Pilot Project.

BIO-1 **Focused Sensitive Plant Species Surveys.** As part of the subsequent project-specific environmental review pursuant to CEQA, focused surveys for future site-specific development shall be conducted, as applicable, during the subsequent project permitting in accordance with the ESL Regulations and City Biology Guidelines, in suitable habitat, in order to determine presence/absence of sensitive plant species within the proposed project site. Focused sensitive plant surveys shall be conducted during the species' specific blooming periods to determine presence/absence. If sensitive plant species are mapped within any proposed construction, access, or staging areas, these species shall be quantified and flagged prior to the issuance of Notice to Proceed, and these areas shall be modified to avoid direct impacts to mapped sensitive plant species. If significant impacts to these species are unavoidable, the take of these species shall be reduced to below a level of significance through implementation of one or a combination of the following actions, in accordance with a City of San Diego approved Conceptual Restoration Plan or acquisition of mitigation credits:

- Impacted plants shall be salvaged and relocated to suitable habitat in an on-site restoration area within the Multi-Habitat Planning Area boundary, if possible. If relocation to a restoration area is not practical, the plants shall be

relocated off-site to an appropriate (nearby) location determined by a qualified biologist in coordination with City of San Diego.

- Seeds from impacted plants shall be collected for use at a local off-site location, as applicable.
- Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site.
- Comparable habitat at an approved off-site location shall be determined by a qualified biologist in coordination with City of San Diego and preserved for relocation, enhancement, or transplant of the impacted sensitive plants.

Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all of the following:

- Conceptual planting plan prepared by a qualified biologist including grading and, if appropriate, temporary irrigation
- Planting specifications and fencing and signage to discourage unauthorized access of the planting site
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

Indirect Impacts

No mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct and Indirect Impacts

No mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct and Indirect Impacts

No mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

No mitigation is required.

7.2.3.2 Sensitive Wildlife Species

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Significant direct impacts to sensitive wildlife species, including but not limited to black tern, Caspian tern, Costa's hummingbird, double-crested cormorant, northwestern San Diego pocket mouse, osprey, and San Diegan legless lizard, as well as nesting birds and raptors protected under the CFGC and MBTA, could result during construction of the subsequent Pilot Project from temporary displacement and permanent removal of these species' suitable habitats. Implementation of Mitigation Measure BIO-2 would reduce potential direct impacts to sensitive wildlife species through monitoring by a qualified biologist prior to and during construction of the Pilot Project. Per the Biology Guidelines, direct impacts to vegetation communities used by sensitive wildlife species would be conserved or restored through the implementation of Mitigation Measure BIO-3 through Mitigation Measure BIO-6. These mitigation measures reduce potential direct impacts to sensitive wildlife species, including nesting birds and raptors protected under the CFGC and MBTA, through conducting sensitive avian and wildlife species focused surveys prior to construction and providing mitigation or revegetation for impacts to sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species in the Ocean Beach – Dog Beach project site.

BIO-2 **Qualified Monitoring Biologist.** Prior to subsequent project-level approval and prior to the issuance of Notice to Proceed and/or first preconstruction meeting, the City of San Diego shall submit a letter to the appropriate City Department and/or Environmental Designee at the time of future project implementation, which confirms that a qualified monitoring biologist, pursuant to the City of San Diego's Biology Guidelines, has been retained to implement required monitoring. This letter will also include the names and resumes of all people involved in the biological monitoring of the project, a schedule for the proposed work, and the facility's pre-approved Facility Maintenance Plan.

The qualified monitoring biologist shall be responsible for the following monitoring and reporting tasks:

I. Prior to Construction

a. **Documentation.** Prior to the issuance of the Notice to Proceed and/or first preconstruction meeting of a future proposed project site within, or immediately adjacent to, a Multi-Habitat Planning Area, the qualified monitoring biologist shall verify and submit proof to the appropriate City of San Diego Department/Environmental Designee at the time of future project

implementation that all Multi-Habitat Planning Area boundaries and limits of work have been delineated on all maintenance documents.

b. **Biological Construction Mitigation/Monitoring Exhibit (BCME).** Prior to the the issuance of the Notice to Proceed and/or first preconstruction meeting, the qualified monitoring biologist shall submit a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes limits of work, proposed monitoring schedule, avian, focused sensitive species, or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife protocol), timing of surveys, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, species-specific Multiple Species Conservation Program Subarea Plan Area-Specific Management Directives, and any subsequent requirements determined by the qualified monitoring biologist and the City of San Diego Environmental Designee at the time of future project implementation. The BCME shall include the construction site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule for construction activities. Where the potential for impacts to biological resources is limited (e.g., construction within a footprint that consists entirely of previously developed or disturbed lands), the BCME may be limited to a pre- and post-maintenance verification inspection. For highly sensitive resource areas, full-time biological monitors may be required. The BCME shall be approved by the City of San Diego Environmental Designee prior to the start of construction.

c. **Resource Marking/Protection.** Prior to the issuance of the Notice to Proceed and/or first preconstruction meeting, within the future site-specific proposed project site, the qualified monitoring biologist shall supervise the placement of orange construction fencing or similar visible marker, staking, or flagging along the limits of the construction area adjacent to sensitive biological habitats, as shown on the BCME to ensure crews remain within the approved construction limits. These demarcations shall not be required for areas with existing barriers, such as chain-link fencing, along the limits or facilities that are within and/or adjacent to developed and non-sensitive habitat areas. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, sensitive plant and wildlife species, including nesting birds) prior to construction.

d. **Structure Clearance.** Prior to the issuance of the notice to proceed and/or first preconstruction meeting, the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season),

the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allowed the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required.

e. **Pre-Construction Meeting/Education.** Prior to the issuance of the Notice to Proceed, a pre-construction meeting shall be held on site with the following in attendance: City of San Diego's project manager, City of San Diego Environmental Designee, the construction contractor (if applicable), and the qualified monitoring biologist. At this meeting, the qualified monitoring biologist shall identify and discuss the construction protocols that apply to the proposed activities and the sensitive nature of the adjacent habitat with appropriate project personnel.

   At the pre-construction meeting, the qualified monitoring biologist shall submit to the City of San Diego representative and construction contractor a copy of the BCME that identifies areas to be protected, fenced, and monitored. This data shall include all buffer limits, if applicable.

   Prior to the start of construction activities, the qualified monitoring biologist shall meet with the construction contractor and crew and conduct an on-site educational session regarding the need to avoid impacts outside the approved construction footprint and to protect sensitive plants and wildlife that may occur at the specific facility. This may include but not be limited to explanations of the avian and wetland buffers, the flag system for removal of invasive species or retention of sensitive plants, and clarification of acceptable access routes/methods and staging areas.

II. During Construction

f. **Biological Monitoring and Reporting.** The qualified monitoring biologist shall inspect/monitor the project construction area in accordance with the approved BCME. This may be limited to pre- and post-maintenance inspections, weekly visits, or full-time monitoring, as determined by the qualified monitoring biologist and City of San Diego representative.

   The qualified monitoring biologist shall document monitoring events via a Consultant Site Visit Record. This record shall be sent to the project manager each month, and the project manager shall forward copies to Mitigation Monitoring Coordination. However, if weekly reports are submitted as part of a separate agency permit requirement, these reports may be forwarded to the City of San Diego representative in place of Consultant Site Visit Record submittals.

g. **Cover Trenches.** The qualified monitoring biologist shall oversee the construction site so that cover and/or escape routes for wildlife from excavated areas shall be provided daily. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified monitoring biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified monitoring biologist shall verify that the contractor has covered all steep-walled trenches or excavations prior to the end of construction daily. If wildlife species are encountered within any trenches or excavated areas, the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allowed to disperse. In addition, the qualified monitoring biologist shall provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife.

III. Post Construction

h. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with the City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law.

i. The qualified monitoring biologist shall submit a final BCME/report to the satisfaction of the City of San Diego Environmental Designee within 30 days of construction completion.

BIO-3 **Focused Avian Species Surveys.** Prior to subsequent project-level approval and prior to the issuance of the Notice to Proceed and/or first preconstruction meeting, as part of the project-specific environmental review pursuant to CEQA, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, in order to determine presence/absence of sensitive avian species within the proposed survey area. Focused sensitive avian surveys shall be conducted during the species' specific breeding seasons to determine presence/absence within the development footprint plus a buffer, if recommended by the qualified monitoring biologist (see Mitigation Measure BIO-2). The survey report shall map and describe the location

and extent of observed sensitive avian species that would be impacted within the areas of potential effect for each project site. If significant impacts to these species are unavoidable, the take of these species shall be reduced to below a level of significance through implementation of the Avian Protection measures identified in Mitigation Measure BIO-2 (under subheading c. Resource Marking/Protection).

BIO-4 **Focused Sensitive Wildlife Species Surveys.** Prior to subsequent project-level approval and prior to the issuance of the Notice to Proceed and/or first preconstruction meeting, as part of the project-specific environmental review pursuant to CEQA, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, in order to determine presence/absence of sensitive wildlife species within the proposed survey area. The survey report shall map and describe the location and extent of observed special-status animal species that would be impacted within the areas of potential effect for each project site. If special-status animal species are present or potentially present based on the survey, the survey report shall include avoidance and minimization measures to avoid or relocate these species through Structure Clearance measures as described in Mitigation Measure BIO-2 (under subheading e. Pre-Construction Meeting/Education).

BIO-5 **Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Impacts Mitigation.** Prior to subsequent project level approval, as part of subsequent project-level environmental review pursuant to CEQA, any direct impacts to sensitive vegetation communities or jurisdictional aquatic resources would require mitigation to comply with City of San Diego, state and/or federal authorizations, in accordance with the City of San Diego's Biology Guidelines Table 2A and Table 3 ratios described in the following tables (Mitigation Ratios for Potential Impacts to Wetlands and Jurisdictional Aquatic Resources and Mitigation Ratios for Potential Impacts to Upland Habitats), as well as the ratios defined in any state and/or federal permit(s) issued for the project.

Mitigation Ratios for Potential Impacts to Wetlands and Jurisdictional Aquatic Resources

General Vegetation Type (Holland/Oberbauer Code)	Biology Guidelines Vegetation Community/Wetland	Jurisdiction	Biology Guidelines Required Mitigation Ratio (in COZ)
Subtidal Ocean (64111)	Marine Habitat/-/Wetland	U/R/C/CC	2:1
Intertidal Ocean (64112)	Marine Habitat/-/Wetland	U/R/C/CC	2:1
Estuarine (64130)	Marine Habitat/-/Wetland	U/R/C/CC	2:1
Southern Coastal Salt Marsh (52120)	Marine Habitat/-/Wetland	U/R/C/CC	2:1
Beach (64400)	Marine Habitat	C/CC	2:1
Sandstone Cliff	None	C/CC	1:1
Concrete channel	Disturbed Land/IV/-	U/R/C/CC	0:1[1]

Notes: C = CDFW Jurisdictional; CC = CCC Jurisdictional; COZ = Coastal Overlay Zone; R = RWQCB Jurisdictional; Biology Guidelines = San Diego Biology Guidelines; U = USACE Jurisdictional

Any impacts to wetlands must be mitigated "in-kind" and achieve a "no-net loss" of wetland functions and values.

[1] No mitigation ratio is required per the Biology Guidelines; however, a minimum of a 2:1 ratio would be required by the regulatory agencies during the permitting process.

Mitigation Ratios for Potential Impacts to Upland Habitats

Tier	Habitat Type	Mitigation Ratios
Tier I (Rare Uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Tier I Mitigation Ratios: Location of Impact — Inside MHPA: Preservation Inside MHPA 2:1, Preservation Outside MHPA 3:1; Outside MHPA: Preservation Inside MHPA 1:1, Preservation Outside MHPA 2:1
Tier II (Uncommon Uplands)	Coastal Sage Scrub CSS/Chaparral	Tier II Mitigation Ratios: Location of Impact — Inside MHPA: Preservation Inside MHPA 1:1, Preservation Outside MHPA 2:1; Outside MHPA: Preservation Inside MHPA 1:1, Preservation Outside MHPA 1.5:1
Tier IIIA (Common Uplands)	Mixed Chaparral Chamise Chaparral	Tier IIIA Mitigation Ratios: Location of Impact — Inside MHPA: Preservation Inside MHPA 1:1, Preservation Outside MHPA 1.5:1; Outside MHPA: Preservation Inside MHPA 0.5:1, Preservation Outside MHPA 1:1
Tier IIIB (Common Uplands)	Non-Native Grasslands	Tier IIIB Mitigation Ratios: Location of Impact — Inside MHPA: Preservation Inside MHPA 1:1, Preservation Outside MHPA 1.5:1; Outside MHPA: Preservation Inside MHPA 0.5:1, Preservation Outside MHPA 1:1
Tier IV (Other Uplands)	Disturbed Land Agriculture Eucalyptus Woodland Ornamental Plantings	Tier IV Mitigation Ratios: Location of Impact — Inside MHPA: Preservation Inside MHPA 0:1, Preservation Outside MHPA 0:1; Outside MHPA: Preservation Inside MHPA 0:1, Preservation Outside MHPA 0:1

Notes:

For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

For impacts to Tier II, IIIA and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I through III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

1. Potential direct impacts to sensitive vegetation communities, including jurisdictional aquatic resources, resulting from project implementation shall be mitigated consistent with the City's Biology Guidelines through one of the following three options:
    a. Project compensatory mitigation for proposed impacts to sensitive vegetation communities, including but not limited to jurisdictional aquatic resources, shall be provided through in-kind and on-site creation, enhancement, and/or restoration.
    b. If during subsequent environmental review it is determined that compensatory mitigation requirements cannot be satisfied through on-site creation, restoration, and/or enhancement, these shall be satisfied through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the appropriate watershed located within the City of San Diego jurisdictional boundaries unless approved by the Wildlife Agencies. Prior to implementation of project construction impacts that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the City of San Diego Environmental Designee for confirmation.
    c. If credits are not available at a resource agency-approved mitigation site within the City's jurisdiction or through other approved off-site mitigation credits, implementation of habitat creation, restoration, enhancement, and/or preservation would occur through a City-approved Habitat Mitigation and Monitoring Plan. Under this option, as well as under option a, referenced above, a Habitat Mitigation and Monitoring Plan shall be provided and prepared in accordance with the Biology Guidelines, which shall include definitions for creation, restoration, enhancement, and acquisition identified under the City's Biology Guidelines satisfaction of no net loss pursuant to the City's Environmentally Sensitive Lands regulations; timing in relation to project impacts; and generally, with federal and state mitigation requirements.

When proposed mitigation involves habitat enhancement, restoration or creation, the Habitat Mitigation and Monitoring Plan shall include all of the following information:

- Conceptual planting plan including planting zones, grading, and irrigation
- Seed mix/planting palette
- Planting specifications
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

For mitigation that involves habitat acquisition, the Habitat Mitigation and Monitoring Plan shall include all of the following:

- Location of proposed acquisition
- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity

The identification of mitigation site credits shall be provided to the Environmental Designee and shall include the following:

- Location of approved mitigation site
- Description of the mitigation credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation of the credits that are associated with a mitigation bank, which has been approved by the appropriate resource agencies
- Documentation in the form of a current mitigation credit ledger

BIO-6 **Habitat Restoration for Temporary Impacts in Upland Areas.** Prior to subsequent project approval, as part of subsequent project-specific environmental review pursuant to CEQA, it shall be determined if temporary impacts to habitat would result with site-specific project implementation. Temporary direct impact areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas, in accordance with the City's Biology Guidelines, Multiple Species Conservation Program Subarea Plan, and the City of San Diego's Municipal Code, Land Development Manual—Landscape Standards. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free

straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months after the subsequent 120-day plant establishment period has been approved by City of San Diego Environmental Designee to ensure adequate establishment and sustainability of the plantings/seedings.

Where a project activity involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed where feasible, and the removal shall be monitored by the qualified monitoring biologist to ensure that dispersal of propagules (e.g., seeds, stems, etc.) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the qualified monitoring biologist to ensure the invasives species does not persist or regrow. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed pest control advisor, using chemicals permitted as safe within aquatic environments.

Indirect Impacts

No mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct Impacts

Significant direct impacts to sensitive wildlife species, including but not limited to black tern and Caspian tern, as well as nesting birds and raptors protected under the CFGC and MBTA, could result during construction of the La Jolla Shores, Mission Beach, and Ocean Beach – Pier projects from temporary displacement and permanent removal of these species' suitable habitats. Implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-6 (described under Direct Impacts, Ocean Beach – Dog Beach) would reduce potential direct impacts to sensitive wildlife species through monitoring by a qualified biologist prior to and during construction, conducting sensitive avian and wildlife species focused surveys prior to construction, and providing mitigation or revegetation for impacts to sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species in the La Jolla Shores, Mission Beach, and Ocean Beach - Pier project sites. These mitigation measures reduce potential direct impacts to sensitive wildlife species, including nesting birds and raptors protected under the CFGC and MBTA.

Indirect Impacts

No mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Significant direct impacts to sensitive wildlife species, specifically black tern and Caspian tern, as well as nesting birds and raptors protected under the CFGC and MBTA, could result during construction of the Pacific Beach – Tourmaline Surf Park project from temporary displacement and permanent removal of these species' suitable habitats. Implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-6 (described under Direct Impacts, Ocean Beach – Dog Beach) would reduce potential direct impacts to sensitive wildlife species through monitoring by a qualified biologist prior to and during construction, conducting sensitive avian and wildlife species focused surveys prior to construction, and providing mitigation or revegetation for impacts to sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species in the Pacific Beach – Tourmaline Surf Park project site. These mitigation measures reduce potential direct impacts to sensitive wildlife species, including nesting birds and raptors protected under the CFGC and MBTA.

Indirect Impacts

No mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

Significant indirect impacts to nesting birds and raptors protected under the CFGC and MBTA could result during construction of the Sunset Cliffs project from temporary displacement. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-3, and Mitigation Measure BIO-6 (described under Direct Impacts, Ocean Beach – Dog Beach) would reduce potential direct impacts to sensitive wildlife species through monitoring by a qualified biologist prior to and during construction and conducting sensitive avian and wildlife species focused surveys prior to construction. These mitigation measures reduce potential direct impacts to nesting birds and raptors protected under the CFGC and MBTA.

7.2.4 Significance After Mitigation

7.2.4.1 Sensitive Plant Species

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Implementation of Mitigation Measure BIO-1 would mitigate potential direct impacts to sensitive plant species to below a level of significance through conducting sensitive plant species focused surveys prior to construction of the Pilot Project.

Indirect Impacts

Indirect impacts to sensitive plant species were determined to be less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct and Indirect Impacts

Direct and indirect impacts to sensitive plant species at the La Jolla Shores, Mission Beach, and Ocean Beach – Pier project sites were determined to be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct and Indirect Impacts

Direct and indirect impacts to sensitive plant species at the Pacific Beach – Tourmaline Surf Park project site were determined to be less than significant, and no mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

Direct and indirect impacts to sensitive plant species at the Sunset Cliffs project site were determined to be less than significant, and no mitigation is required.

7.2.4.2 Sensitive Wildlife Species

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-6 would mitigate potential direct impacts to sensitive wildlife species and their habitats, including nesting birds and raptors protected under the CFGC and MBTA, to below a level of significance through monitoring by a qualified biologist, sensitive avian and wildlife species focused surveys prior to construction, and providing mitigation ratios for acreage impacts and the creation and restoration of impacted sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species on the Ocean Beach – Dog Beach project site.

Indirect Impacts

Indirect impacts to sensitive wildlife species were determined to be less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, and Ocean Beach – Pier

Direct Impacts

Implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-6 would mitigate potential direct impacts to sensitive wildlife species and their habitats, including nesting birds and raptors protected under the CFGC and MBTA, to below a level of significance through monitoring by a qualified biologist, sensitive avian and wildlife species focused surveys prior to construction, and providing mitigation ratios for acreage impacts and the creation and restoration of impacted sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species on the La Jolla Shores, Mission Beach, and Ocean Beach – Pier project sites.

Indirect Impacts

Indirect impacts to sensitive wildlife species were determined to be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-6 would mitigate potential direct impacts to sensitive wildlife species and their habitats, including nesting birds and raptors protected under the CFGC and MBTA, to below a level of significance through monitoring by a qualified biologist, sensitive avian and wildlife species focused surveys prior to construction, and providing mitigation ratios for acreage impacts and the creation and restoration of impacted sensitive vegetation communities and jurisdictional aquatic resources that support sensitive wildlife species on the Pacific Beach – Tourmaline Surf Park project site.

Indirect Impacts

Indirect impacts to sensitive wildlife species were determined to be less than significant, and no mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

Direct and indirect impacts to sensitive wildlife species at the Sunset Cliffs project site were determined to be less than significant, and no mitigation is required.

7.3 Threshold 2: Sensitive Vegetation Communities

7.3.1 Guidelines for Determination of Significance

Significant impacts could result if the project had a substantial adverse impact on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

7.3.2 Impact Analysis

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

A total of 7 vegetation communities and/or land cover types occur in the Ocean Beach – Dog Beach survey area (Tables 2a and 2b) that cover a total of 26.4 acres. Construction activities on the Ocean Beach – Dog Beach project site could result in potential impacts to five sensitive vegetation communities, including up to approximately 0.26 acre of estuarine, 0.06 acre of southern coastal salt marsh, 4.93 acre of beach, 0.59 acre of disturbed southern foredunes, and 0.86 acre of disturbed Diegan coastal sage scrub. Impacts to subtidal ocean that occurs in the Ocean Beach – Dog Beach survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

Approximately 2.12 acres of the Ocean Beach – Dog Beach survey area are located within the MHPA boundary. Therefore, direct impacts could occur within and adjacent to the MHPA boundary on the Ocean Beach – Dog Beach project site. Additional short-term direct impacts within the MHPA may also occur from enhancement activities (e.g., hand removal of invasive species) in this site.

An analysis of the exact acreage of impacts that would occur to the sensitive vegetation communities on the Ocean Beach – Dog Beach project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pilot Project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the future site-specific projects. Potential direct impacts to sensitive vegetation communities, including estuarine, southern coastal salt marsh, beach, disturbed southern foredunes, and disturbed Diegan coastal sage scrub, that occur in the Ocean Beach – Dog Beach project site would be potentially significant without mitigation.

As described in Section 7.1.1, Direct Impacts, lands designated as Tier IV (e.g., developed land) are not considered to have significant habitat value, and any proposed impacts to these

communities would not be considered significant. Therefore, impacts to Tier IV developed land on the Ocean Beach – Dog Beach project site would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the Pilot Project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Pilot Project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Pilot Project would be within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the Pilot Project. Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Pilot Project would be less than significant, and no mitigation is required.

La Jolla Shores

Direct Impacts

A total of three vegetation communities and/or land cover types occur in the La Jolla Shores survey area (Tables 2a and 2b) that cover a total of 35.63 acres. Construction activities on the La Jolla Shores project site could result in potential impacts to one sensitive vegetation community, approximately 11.18 acres of beach. Impacts to subtidal ocean that occurs in the La Jolla Shores survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

An analysis of the exact acreage of impacts that would occur to the one sensitive vegetation community, beach, on the La Jolla Shores project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the La Jolla Shores project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the La

Jolla Shores project. Potential direct impacts to the sensitive vegetation community, beach, that occurs in the La Jolla Shores project site would be potentially significant without mitigation.

Impacts to Tier IV developed land on the La Jolla Shores project site would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the La Jolla Shores project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The La Jolla Shores project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the La Jolla Shores project would be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

A total of six vegetation communities and/or land cover types occur in the Pacific Beach – Tourmaline Surf Park survey area (Tables 2a and 2b) that cover a total of 11.97 acres. Construction activities on the Pacific Beach – Tourmaline Surf Park project site could result in potential impacts to three sensitive vegetation communities, including approximately 1.48 acre of beach, 0.05 acre of concrete-lined channel, and 0.09 acres of sandstone cliff. Impacts to subtidal ocean that occurs in the Pacific Beach – Tourmaline Surf Park survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

An analysis of the exact acreage of impacts that would occur to the sensitive vegetation communities, beach, concrete-lined channel, and sandstone cliff, on the Pacific Beach – Tourmaline Surf Park project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pacific Beach – Tourmaline Surf Park project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pacific Beach – Tourmaline Surf Park project. Potential direct impacts to the sensitive vegetation communities,

beach, concrete-lined channel, and sandstone cliff, that occurs in the Pacific Beach – Tourmaline Surf Park project site would be potentially significant without mitigation.

While impacts to the non-native woodland are not anticipated, impacts to Tier IV non-native woodland and developed land on the Pacific Beach – Tourmaline Surf Park project site would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the Pacific Beach – Tourmaline Surf Park project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Pacific Beach – Tourmaline Surf Park project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Pacific Beach – Tourmaline Surf Park project would be less than significant, and no mitigation is required.

Mission Beach

Direct Impacts

A total of three vegetation communities and/or land cover types occur in the Mission Beach survey area (Tables 2a and 2b) that cover a total of 17.09 acres. Construction activities on the Mission Beach project site could result in potential impacts to one sensitive vegetation community, approximately 8.13 acres of beach. Impacts to subtidal ocean that occurs in the Mission Beach survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

An analysis of the exact acreage of impacts that would occur to the one sensitive vegetation community, beach, on the Mission Beach project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Mission Beach project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Mission Beach project. Potential direct impacts to the sensitive vegetation community, beach, that occurs in the Mission Beach project site would be potentially significant without mitigation.

While impacts to the Tier IV developed land that occurs in the Mission Beach survey buffer outside of the project site are not anticipated, potential impacts would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the Mission Beach project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Mission Beach project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Mission Beach project would be less than significant, and no mitigation is required.

Ocean Beach – Pier

Direct Impacts

A total of three vegetation communities and/or land cover types occur in the Ocean Beach – Pier survey area (Tables 2a and 2b) that cover a total of 21.37 acres. Construction activities on the Ocean Beach – Pier project site could result in potential impacts to one sensitive vegetation community, approximately 8.02 acres of beach. Impacts to subtidal ocean that occurs in the Ocean Beach – Pier survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

An analysis of the exact acreage of impacts that would occur to the one sensitive vegetation community, beach, on the Ocean Beach – Pier project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Ocean Beach – Pier project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Ocean Beach – Pier project. Potential direct impacts to the sensitive vegetation community, beach, that occurs in the Ocean Beach – Pier project site would be potentially significant without mitigation.

Impacts to Tier IV developed land on Ocean Beach – Pier project site would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the Ocean Beach – Pier project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Ocean Beach – Pier project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Ocean Beach – Pier project would be less than significant, and no mitigation is required.

Sunset Cliffs

Direct Impacts

A total of five vegetation communities and/or land cover types occur in the Sunset Cliffs survey area (Tables 2a and 2b) that cover a total of 29.78 acres. Construction activities on the Sunset Cliffs project site are anticipated to occur entirely within the developed land; however, project activities could result in potential impacts to one sensitive vegetation community, up to approximately 0.02 acre of sandstone cliff. Impacts to subtidal ocean, intertidal ocean, and beach that occur in the Sunset Cliffs survey buffer, outside of the project site, are not anticipated. As previously mentioned, the entire survey area is within the COZ.

The MHPA occurs only within the survey buffer of the Sunset Cliffs project site, not within the site itself. Therefore, direct impacts could occur adjacent to the MHPA boundary on the Sunset Cliffs project site.

An analysis of the exact acreage of impacts that would occur to the sensitive vegetation community, sandstone cliff, on the Sunset Cliffs project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Sunset Cliffs project, and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Sunset Cliffs project. Potential direct impacts to the sensitive vegetation community, sandstone cliff, that occurs in the Sunset Cliffs project site would be potentially significant without mitigation.

Impacts to Tier IV developed land on the Sunset Cliffs project site would not require mitigation, in accordance with the Biology Guidelines (City of San Diego 2018).

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Section 7.2, Threshold 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. As previously discussed in Section 7.2.2, Indirect Impacts, the Sunset Cliffs project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Sunset Cliffs project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Sunset Cliffs project would be adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the Sunset Cliffs project. Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Sunset Cliffs project would be less than significant, and no mitigation is required.

7.3.3 Mitigation Measures

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Development of the Pilot Project could result in potentially significant direct impacts to sensitive vegetation communities, including estuarine, southern coastal salt marsh, beach, disturbed southern foredunes, and disturbed Diegan coastal sage scrub, which are located within and adjacent to the MHPA boundary. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to sensitive vegetation communities through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones.

Indirect Impacts

No mitigation is required.

La Jolla Shores

Direct Impacts

Development of the La Jolla Shores project could result in potentially significant direct impacts to one sensitive vegetation community, beach. Implementation of Mitigation Measure BIO-2, Mitigation

Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to this sensitive vegetation community through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted areas.

Indirect Impacts

No mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Development of the Pacific Beach – Tourmaline Surf Park project could result in potentially significant direct impacts to communities, including beach, concrete-lined channel, and sandstone cliff. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to this sensitive vegetation community through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted areas.

Indirect Impacts

No mitigation is required.

Mission Beach

Direct Impacts

Development of the Mission Beach project could result in potentially significant direct impacts to one sensitive vegetation community, beach. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to this sensitive vegetation community through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones.

Indirect Impacts

No mitigation is required.

Ocean Beach – Pier

Direct Impacts

Development of the Ocean Beach – Pier project could result in potentially significant direct impacts to one sensitive vegetation community, beach. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife

Species Direct Impacts Mitigation) would reduce direct impacts to this sensitive vegetation community through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones.

Indirect Impacts

No mitigation is required.

Sunset Cliffs

Direct Impacts

Development of the Sunset Cliffs project could result in potentially significant direct impacts to one sensitive vegetation community, sandstone cliff, which is located adjacent to the MHPA boundary. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to this sensitive vegetation community through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones.

Indirect Impacts

No mitigation is required.

7.3.4 Significance After Mitigation

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

La Jolla Shores

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level

of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

Mission Beach

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

Ocean Beach – Pier

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

Sunset Cliffs

Direct Impacts

Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating new vegetation communities and restoring impacted ones.

Indirect Impacts

Indirect impacts to sensitive vegetation communities were determined to be less than significant, and no mitigation is required.

7.4 Threshold 3: Jurisdictional Aquatic Resources

7.4.1 Guidelines for Determination of Significance

A significant impact could result if the project had a substantial adverse impact on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

7.4.2 Impact Analysis

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 11.37 acres of wetlands and non-wetland waters potentially under the jurisdiction of the USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the Ocean Beach – Dog Beach survey area. These potentially jurisdictional aquatic resources in the Ocean Beach – Dog Beach survey area include approximately 0.88 acre of marine wetland waters (southern coastal salt marsh), and 10.49 acres of marine non-wetland waters (0.34 acre of subtidal ocean, 1.25 acres of estuarine, and 8.9 acres of beach). Construction activities on the Ocean Beach – Dog Beach project site could result in potential impacts to jurisdictional aquatic resources, including estuarine, southern coastal salt marsh, and beach. Specifically, construction of the proposed sand dune would require excavation of sand from the beach intertidal zone, similar to the City's existing annual winter berm program. Impacts to subtidal ocean that occurs in the Ocean Beach – Dog Beach survey buffer, outside of the project site, are not anticipated.

As discussed in Section 7.3, Threshold 2: Sensitive Vegetation Communities, the project could result in direct impacts to the aquatic and wetland vegetation communities also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego. An analysis of the exact acreage of impacts that would occur to jurisdictional aquatic resources in the Ocean Beach – Dog Beach project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pilot Project, and any impacts to jurisdictional aquatic resources would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pilot Project. Potential direct impacts to jurisdictional aquatic resources, including estuarine, southern coastal salt marsh, and beach, that occur in the Ocean Beach – Dog Beach project site would be potentially significant without mitigation.

For development in the COZ, the City's Land Development Code, ESL Regulations and Biology Guidelines require a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since a large portion of the Pilot Project necessarily occurs within or directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS as part of the subsequent project-specific environmental review pursuant to CEQA, in accordance with the requirements in the ESL Regulations, and Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some areas, the Pilot Project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the Pilot Project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the Pilot Project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

As previously discussed in Section 3, the Pilot Project would be required to be in compliance with all federal, state, and local regulations protecting biological resources as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. The Pilot Project would be required to obtain regulatory permits from the USACE, RWQCB, and CDFW and provide

compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant without mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the Pilot Project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Pilot Project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Pilot Project is within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The Pilot Project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the project. Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the Pilot Project would be less than significant, and no mitigation is required.

La Jolla Shores

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 18.34 acres of non-wetland waters potentially under the jurisdiction of the USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the La Jolla Shores survey area. These potentially jurisdictional aquatic resources in the La Jolla Shores survey area include marine non-wetland waters (approximately 3.05 acres of subtidal ocean and 15.29 acres of beach). Construction activities on the La Jolla Shores project site could result in potential impacts to jurisdictional aquatic resources. Impacts to subtidal ocean that occurs in the La Jolla Shores survey buffer, outside of the project site, are not anticipated.

As discussed in Section 7.3, Threshold 2: Sensitive Vegetation Communities, the project could result in direct impacts to the aquatic vegetation community, beach, which also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego. An analysis of the exact acreage of impacts that would occur to jurisdictional aquatic resources in the La Jolla Shores project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific

analysis would be conducted upon submittal of the La Jolla Shores project, and any impacts to jurisdictional aquatic resources would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the La Jolla Shores project. Potential direct impacts to jurisdictional aquatic resource, beach, that occurs in the La Jolla Shores project site would be potentially significant without mitigation.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since a large portion of the La Jolla Shores project necessarily occurs within or directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in the Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some areas, the La Jolla Shores project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the La Jolla Shores project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the La Jolla Shores project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

As previously discussed in Section 3, the La Jolla Shores project would demonstrate compliance with all federal, state, and local regulations protecting biological resources as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. The La Jolla Shores project would be required to obtain regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant without mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the La Jolla Shores project would be required to be in

compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The La Jolla Shores project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the La Jolla Shores project would be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 4.32 acres of non-wetland waters potentially under the jurisdiction of the USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the Pacific Beach – Tourmaline Surf Park survey area. These potentially jurisdictional aquatic resources in the Pacific Beach – Tourmaline Surf Park survey area include marine non-wetland waters (approximately 0.36 acre of subtidal ocean and 3.56 acres of beach) and 0.40 acre of non-wetland waters (concrete channel). Construction activities on the Pacific Beach – Tourmaline Surf Park project site could result in potential impacts to jurisdictional aquatic resources, including beach and concrete channel. Specifically, construction of the proposed sand and cobble dune would require excavation of sand from the beach intertidal zone, similar to the City's existing annual winter berm program. Impacts to subtidal ocean that occurs in the Pacific Beach – Tourmaline Surf Park survey buffer, outside of the project site, are not anticipated.

As discussed in Section 7.3, Threshold 2: Sensitive Vegetation Communities, the project could result in direct impacts to the aquatic and wetland vegetation communities also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego. An analysis of the exact acreage of impacts that would occur to jurisdictional aquatic resources in the Pacific Beach – Tourmaline Surf Park project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Pacific Beach – Tourmaline Surf Park project, and any impacts to jurisdictional aquatic resources would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Pacific Beach – Tourmaline Surf Park project. Potential direct impacts to jurisdictional aquatic resources, including beach and concrete channel, that occur in the Pacific Beach – Tourmaline Surf Park project site would be potentially significant without mitigation.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since a large portion of the Pacific Beach – Tourmaline Surf Park project necessarily occurs within or directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in the ESL Regulations and the Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some areas, the Pacific Beach – Tourmaline Surf Park project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the Pacific Beach – Tourmaline Surf Park project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the Pacific Beach – Tourmaline Surf Park project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

As previously discussed in Section 3, the Pacific Beach – Tourmaline Surf Park project would be required to be in compliance with all federal, state, and local regulations protecting biological resources as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. The Pacific Beach – Tourmaline Surf Park project would be required to obtain regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant without mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the Pacific Beach – Tourmaline Surf Park project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Pacific Beach – Tourmaline Surf Park project's consistency with the MSCP SAP General

Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of Pacific Beach – Tourmaline Surf Park project would be less than significant, and no mitigation is required.

Mission Beach

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 13.16 acres of non-wetland waters potentially under the jurisdiction of the USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the Mission Beach survey area. These potentially jurisdictional aquatic resources in the Mission Beach survey area include marine non-wetland waters (approximately 3.67 acres of subtidal ocean and 9.49 acres of beach). Construction activities on the Mission Beach project site could result in potential impacts to jurisdictional aquatic resources. Specifically, construction of the proposed sand dune would require excavation of sand from the beach intertidal zone, similar to the City's existing annual winter berm program. Impacts to subtidal ocean that occurs in the Mission Beach survey buffer, outside of the project site, are not anticipated.

As discussed in Section 7.3, Threshold 2: Sensitive Vegetation Communities, the project could result in direct impacts to the aquatic vegetation community, beach, which also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego. An analysis of the exact acreage of impacts that would occur to jurisdictional aquatic resources in the Mission Beach project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Mission Beach project, and any impacts to jurisdictional aquatic resources would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Mission Beach project. Potential direct impacts to jurisdictional aquatic resource, beach, that occurs in the Mission Beach project site would be potentially significant without mitigation.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since a large portion of the Mission Beach project necessarily occurs within or directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in the Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some

areas, the Mission Beach project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the Mission Beach project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the Mission Beach project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

As previously discussed in Section 3, the Mission Beach project would be required to be in compliance with all federal, state, and local regulations protecting biological resources as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. The Mission Beach project would be required to obtain regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant without mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the Mission Beach project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Mission Beach project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the Mission Beach project would be less than significant, and no mitigation is required.

Ocean Beach – Pier

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 11.91 acres of non-wetland waters potentially under the jurisdiction of the

USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the Ocean Beach – Pier survey area. These potentially jurisdictional aquatic resources in the Ocean Beach – Pier survey area include marine non-wetland waters (approximately 2.64 acres of subtidal ocean and 9.27 acres of beach). Construction activities on the Ocean Beach – Pier project site could result in potential impacts to jurisdictional aquatic resources. Specifically, construction of the proposed sand dune would require excavation of sand from the beach intertidal zone, similar to the City's existing annual winter berm program. Impacts to subtidal ocean that occurs in the Ocean Beach – Pier survey buffer, outside of the project site, are not anticipated.

As discussed in Section 7.3, Threshold 2: Sensitive Vegetation Communities, the project could result in direct impacts to the aquatic vegetation community, beach, which also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego. An analysis of the exact acreage of impacts that would occur to jurisdictional aquatic resources in the Ocean Beach – Pier project site as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific project designs are not known at this time. As future site-specific project designs are finalized, project-specific analysis would be conducted upon submittal of the Ocean Beach – Pier project, and any impacts to jurisdictional aquatic resources would be avoided, minimized, or mitigated as conditions of subsequent project-level approval prior to the implementation of the Ocean Beach – Pier project. Potential direct impacts to jurisdictional aquatic resource, beach, that occurs in the Ocean Beach – Pier project site would be potentially significant without mitigation.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since a large portion of the Ocean Beach – Pier project necessarily occurs within or directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in the ESL Regulations and the Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some areas, the Ocean Beach – Pier project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the Ocean Beach – Pier project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the Ocean Beach – Pier project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

As previously discussed in Section 3, the Ocean Beach – Pier project would be required to be in compliance with all federal, state, and local regulations protecting biological resources and any mitigation measures identified at the time of subsequent project review would be incorporated as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. The Ocean Beach – Pier project would be required to obtain regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant without mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the Ocean Beach – Pier project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Ocean Beach – Pier project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the Ocean Beach – Pier project would be less than significant, and no mitigation is required.

Sunset Cliffs

Direct Impacts

As discussed in Section 5.2, Jurisdictional Aquatic Resources, and shown on Tables 2a and 3, a total of approximately 5.77 acres of non-wetland waters potentially under the jurisdiction of the USACE and RWQCB, CDFW and/or wetlands regulated by the City of San Diego occur in the Sunset Cliffs survey area. These potentially jurisdictional aquatic resources occur in the Sunset Cliffs survey buffer, outside of the project site, and include marine non-wetland waters (approximately 2.16 acres of subtidal ocean, 0.74 acre of intertidal ocean, and 2.87 acres of beach). Thus, construction activities on the Sunset Cliffs project site are not anticipated to result in impacts to these jurisdictional aquatic resources. Therefore, direct impacts to jurisdictional aquatic resources would be less than significant, and no mitigation is required.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is

maintained. Since the Sunset Cliffs project necessarily occurs directly adjacent to wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with the USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in the Biology Guidelines (City of San Diego 2018). Although wetland buffers may be reduced in some areas, Sunset Cliffs project would result in the protection and restoration of natural coastline functions such that the project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the Sunset Cliffs project activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's LDC ESL regulations. In addition, to the extent feasible, the Sunset Cliffs project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of temporary access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant, and no mitigation is required.

Indirect Impacts

Most of the indirect impacts to sensitive vegetation communities described in Section 6.2.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. As previously discussed in Section 7.2.2, Impact Analysis, the Sunset Cliffs project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Sunset Cliffs project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Sunset Cliffs project is adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The Sunset Cliffs project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the project. Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the Sunset Cliffs project would be less than significant, and no mitigation is required.

7.4.3 Mitigation Measures

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Development of the Pilot Project could result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and

Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas.

Prior to implementation of the Pilot Project and proposed Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6, resource agency (USACE, CDFW, and RWQCB) approval of the mitigation strategy to compensate for unavoidable impacts to jurisdictional aquatic resources through the permitting process would be required. Implementation of Mitigation Measure BIO-7 would reduce direct impacts to jurisdictional aquatic resources through obtaining resource agency permits.

BIO-7 **Potentially Jurisdictional Aquatic Resources Permitting.** Temporary and permanent impacts to the wetland and non-wetland waters potentially under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, shall be authorized by the U.S. Army Corps of Engineers through the Section 404 Permit Program, by the Regional Water Quality Control Board through a 401 State Water Quality Certification, and by the California Department of Fish and Wildlife through a 1602 Streambed Alteration Agreement. Approved temporary and permanent impacts to the potentially federal and state jurisdictional aquatic resources in the project site require compensatory mitigation through proposed on-site habitat restoration, creation, or enhancement to the satisfaction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife to achieve a no-net loss of federal and state jurisdictional wetland and non-wetland waters.

Indirect Impacts

No mitigation is required.

La Jolla Shores

Direct Impacts

Development of the La Jolla Shores project could result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas.

Prior to implementation of the La Jolla Shores project and proposed Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6, resource agency (USACE, CDFW, and RWQCB) approval of the mitigation strategy to compensate for unavoidable impacts to jurisdictional

aquatic resources through the permitting process would be required. Implementation of Mitigation Measure BIO-7 (described under Ocean Beach – Dog Beach Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through obtaining resource agency permits.

Indirect Impacts

No mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Development of the Pacific Beach – Tourmaline Surf Park project could result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas.

Prior to implementation of the Pacific Beach – Tourmaline Surf Park project and proposed Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6, resource agency (USACE, CDFW, and RWQCB) approval of the mitigation strategy to compensate for unavoidable impacts to jurisdictional aquatic resources through the permitting process would be required. Implementation of Mitigation Measure BIO-7 (described under Ocean Beach – Dog Beach Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through obtaining resource agency permits.

Indirect Impacts

No mitigation is required.

Mission Beach

Direct Impacts

Development of the Mission Beach project could result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas.

Prior to implementation of the Mission Beach project and proposed Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6, resource agency (USACE, CDFW, and RWQCB) approval of the mitigation strategy to compensate for unavoidable impacts to jurisdictional

aquatic resources through the permitting process would be required. Implementation of Mitigation Measure BIO-7 (described under Ocean Beach – Dog Beach Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through obtaining resource agency permits.

Indirect Impacts

No mitigation is required.

Ocean Beach – Pier

Direct Impacts

Development of the Ocean Beach – Pier project could result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6 (described under Sensitive Wildlife Species Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas.

Prior to implementation of the Ocean Beach – Pier project and proposed Mitigation Measure BIO-2, Mitigation Measure BIO-5, and Mitigation Measure BIO-6, resource agency (USACE, CDFW, and RWQCB) approval of the mitigation strategy to compensate for unavoidable impacts to jurisdictional aquatic resources through the permitting process would be required. Implementation of Mitigation Measure BIO-7 (described under Ocean Beach – Dog Beach Direct Impacts Mitigation) would reduce direct impacts to jurisdictional aquatic resources through obtaining resource agency permits.

Indirect Impacts

No mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

No mitigation is required.

7.4.4 Significance After Mitigation

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-5 through Mitigation Measure BIO-7 would mitigate the Pilot Project's potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and restoring temporary impact areas.

Indirect Impacts

Indirect impacts to jurisdictional aquatic resources were determined to be less than significant, and no mitigation is required.

La Jolla Shores

Direct Impacts

Implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-5 through Mitigation Measure BIO-7 would mitigate the La Jolla Shores project's potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and restoring temporary impact areas.

Indirect Impacts

Indirect impacts to jurisdictional aquatic resources were determined to be less than significant, and no mitigation is required.

Pacific Beach – Tourmaline Surf Park

Direct Impacts

Implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-5 through Mitigation Measure BIO-7 would mitigate the Pacific Beach – Tourmaline Surf Park project's potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and restoring temporary impact areas.

Indirect Impacts

Indirect impacts to jurisdictional aquatic resources were determined to be less than significant, and no mitigation is required.

Mission Beach

Direct Impacts

Implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-5 through Mitigation Measure BIO-7 would mitigate the Mission Beach project's potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and restoring temporary impact areas.

Indirect Impacts

Indirect impacts to jurisdictional aquatic resources were determined to be less than significant, and no mitigation is required.

Ocean Beach – Pier

Direct Impacts

Implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-5 through Mitigation Measure BIO-7 would mitigate the Ocean Beach – Pier project's potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and restoring temporary impact areas.

Indirect Impacts

Indirect impacts to jurisdictional aquatic resources were determined to be less than significant, and no mitigation is required.

Sunset Cliffs

Direct and Indirect Impacts

Direct and indirect impacts to sensitive plant species at the Sunset Cliffs project site were determined to be less than significant, and no mitigation is required.

7.5 Threshold 4: Wildlife Corridors and Habitat Linkages

7.5.1 Guidelines for Determination of Significance

A significant impact could result if the project interfered substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites.

7.5.2 Impact Analysis

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

As discussed in Section 5.4.8, Wildlife Corridors and Habitat Linkages, the Ocean Beach – Dog Beach survey area is likely to be used as a wildlife movement corridor because it provides suitable nesting, foraging, and dispersal areas for both sensitive and common wildlife species because of the presence of native vegetation communities (among the last remaining dunes in this part of the City) and its connection and proximity to the Pacific coast and open waters to the west as well as

Smiley Lagoon to the east. The Ocean Beach – Dog Beach survey area is not identified in the MSCP SAP as a biological core or linkage area. However, the Ocean Beach – Dog Beach survey area includes the Pacific coast, which functions as a wildlife movement corridor for resident and migratory birds, marine mammals, and fish species both locally and regionally. The dense residential and commercial development immediately to the south of the survey area has the potential to limit north−south wildlife movement through the survey area. However, the aquatic communities in the survey area in particular are high-quality, contiguous sections of these habitats that support east-west movement and linkages to other habitats along the San Diego River and Pacific coast for both local and migratory species.

Ocean Beach – Dog Beach project impacts are proposed primarily in areas in and adjacent to existing development and would only be short-term impacts that occur during construction activities on the project site. All existing wildlife corridors would remain in place after implementation of the Pilot Project. Therefore, significant direct long-term impacts to wildlife corridors and habitat connectivity provided by the survey area are not expected to occur.

The northern portion of the Ocean Beach – Dog Beach project site is within and adjacent to the MHPA and contain sensitive habitat suitable for wildlife movement and foraging (Figures 2 and 2a). However, the impacts proposed in the Ocean Beach – Dog Beach project site would provide a long-term benefit for wildlife movement through the survey area by protecting critical coastal habitats with nature-based resilience solutions. While project activities may temporarily disrupt wildlife movement through the survey area, the Pilot Project is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would be maintained following project implementation. Therefore, impacts to wildlife corridors and habitat connectivity would be less than significant, and no mitigation is required.

Indirect Impacts

Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed in Section 7.2.2 for impacts to sensitive wildlife species. As previously discussed in that section, the Pilot Project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Pilot Project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines, is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Pilot Project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The Pilot Project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the Pilot Project. Therefore, indirect

impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the Pilot Project would be less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park

Direct Impacts

As discussed in Section 5.4.8, Wildlife Corridors and Habitat Linkages, the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park survey areas are likely to be used as wildlife movement corridors because these areas provide suitable nesting, foraging, and dispersal areas for both sensitive and common wildlife species because of their connection and proximity to the Pacific coast and open waters to the west. The La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park survey areas are not identified in the MSCP SAP as biological core or linkage areas. However, the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park survey areas includes the Pacific coast, which functions as a wildlife movement corridor for resident and migratory birds, marine mammals, and fish species both locally and regionally. The dense residential and commercial development immediately to the east of the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park survey areas have the potential to limit east-west wildlife movement through the survey areas. However, the aquatic communities in the survey areas in particular are high-quality, contiguous sections of these habitats that support north−south movement and linkages to other habitats along the Pacific coast for both local and migratory species.

The La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects impacts are proposed primarily in areas in and adjacent to existing development and would only be short-term impacts that occur during construction activities on the project sites. All existing wildlife corridors would remain in place after implementation of the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects. Therefore, significant direct long-term impacts to wildlife corridors and habitat connectivity provided by the survey areas are not expected to occur.

The impacts proposed in the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park project sites would provide a long-term benefit for wildlife movement through the survey area by protecting critical coastal habitats with nature-based resilience solutions. While project activities may temporarily disrupt wildlife movement through the survey area, the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects are not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would be maintained following implementation of the projects. Therefore, impacts to wildlife corridors and habitat connectivity would be less than significant, and no mitigation is required.

Indirect Impacts

Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed in Section 7.2.2 for impacts to sensitive wildlife species. As previously discussed in that section, the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects' consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines, is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). Therefore, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the La Jolla Shores Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects would be less than significant, and no mitigation is required.

Sunset Cliffs

Direct Impacts

As discussed in Section 5.4.8, Wildlife Corridors and Habitat Linkages, the Sunset Cliffs survey area is likely to be used as a wildlife movement corridor because it provides suitable nesting, foraging, and dispersal areas for both sensitive and common wildlife species because of the its connection and proximity to the Pacific coast and open waters to the west. The Sunset Cliffs survey area is not identified in the MSCP SAP as a biological core or linkage area. However, the Sunset Cliffs survey area includes the Pacific coast, which functions as a wildlife movement corridor for resident and migratory birds, marine mammals, and fish species both locally and regionally. The dense residential and commercial development immediately to the east of the survey area has the potential to limit east-west wildlife movement through the survey area. However, the aquatic communities in the survey area in particular are high-quality, contiguous sections of these habitats that support north−south movement and linkages to other habitats along the Pacific coast for both local and migratory species.

Sunset Cliffs project impacts are proposed primarily in areas in and adjacent to existing development and would only be short-term impacts that occur during construction activities on the project site. All existing wildlife corridors would remain in place after implementation of the Sunset Cliffs project. Therefore, significant direct long-term impacts to wildlife corridors and habitat connectivity provided by the survey area are not expected to occur.

The southern end of the survey buffer of the Sunset Cliffs project site is within and adjacent to the MHPA and contain sensitive habitat suitable for wildlife movement and foraging (Figures 2 and 2f).

However, the impacts proposed in the Sunset Cliffs project site would provide a long-term benefit for wildlife movement through the survey area by protecting critical coastal habitats with nature-based resilience solutions. While project activities may temporarily disrupt wildlife movement through the survey area, the Sunset Cliffs project is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would be maintained following project implementation. Therefore, impacts to wildlife corridors and habitat connectivity would be less than significant, and no mitigation is required.

Indirect Impacts

Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed in Section 7.2.2 for impacts to sensitive wildlife species. As previously discussed in that section, the Sunset Cliffs project would be required to be in compliance with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The Sunset Cliffs project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines, is demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2). In addition, because the Sunset Cliffs project is located adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. The Sunset Cliffs project's consistency with the MHPA LUAGs is demonstrated in Table 7 (Section 6.1.3). Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the Sunset Cliffs project. Therefore, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the Sunset Cliffs project would be less than significant, and no mitigation is required.

7.5.3 Mitigation Measures

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

No mitigation is required.

Indirect Impacts

No mitigation is required.

La Jolla Shores, Mission Beach, Ocean Beach – Pier, Pacific Beach – Tourmaline Surf Park, and Sunset Cliffs

Direct Impacts

No mitigation is required.

Indirect Impacts

No mitigation is required.

7.5.4 Significance After Mitigation

Pilot Project: Ocean Beach – Dog Beach

Direct Impacts

Direct impacts to wildlife movement corridors and habitat linkages within the Ocean Beach – Dog Beach survey area were determined to be less than significant, and no mitigation is required.

Indirect Impacts

Indirect impacts to wildlife movement corridors and habitat linkages within the Ocean Beach – Dog Beach survey area were determined to be less than significant, and no mitigation is required.

La Jolla Shores, Mission Beach, Ocean Beach – Pier, Pacific Beach – Tourmaline Surf Park, and Sunset Cliffs

Direct Impacts

Direct impacts to wildlife movement corridors and habitat linkages within the La Jolla Shores, Mission Beach, Ocean Beach – Pier, Pacific Beach – Tourmaline Surf Park, and Sunset Cliffs survey areas were determined to be less than significant, and no mitigation is required.

Indirect Impacts

Indirect impacts to wildlife movement corridors and habitat linkages within the La Jolla Shores, Mission Beach, Ocean Beach – Pier, Pacific Beach – Tourmaline Surf Park, and Sunset Cliffs survey areas were determined to be less than significant, and no mitigation is required.

7.6 Threshold 5: Habitat Conservation Plans

7.6.1 Guidelines for Determination of Significance

A significant impact could result if the project conflicted with the provisions of the MSCP, VPHCP, other adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state Habitat Conservation Plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area.

7.6.2 Impact Analysis

Pilot Project: Ocean Beach – Dog Beach; Sunset Cliffs

As previously discussed, the Ocean Beach – Dog Beach project site, and the survey buffer of the Sunset Cliffs project site, are within the MHPA, and other potential impacts would occur within and adjacent to the MHPA as a result of project implementation (Figures 2, 2a, and 2f). Implementation of the Ocean Beach – Dog Beach and Sunset Cliffs projects would be unlikely to introduce new land uses adjacent to the MHPA because the project would include construction of nature-based coastal resilience and habitat protection structures that would be similar to the current condition. However, when land is developed adjacent to the MHPA, there is potential for indirect impacts to occur that would result in detrimental effects related to drainage, toxics, lighting, noise, human intrusion, and invasive species. Indirect impacts from the Ocean Beach – Dog Beach and Sunset Cliffs projects could occur adjacent to the MHPA from project activities. The Ocean Beach – Dog Beach and Sunset Cliffs projects would be required to document compliance with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, and species-specific ASMDs provided in the MSCP SAP Appendix A (City of San Diego 1997). Table 5 in Section 6.1.1 demonstrates the Ocean Beach – Dog Beach and Sunset Cliffs project's compliance with the MSCP SAP General Management Directives and species-specific ASMDs. Table 6 in Section 6.1.2 demonstrates the Ocean Beach – Dog Beach and Sunset Cliffs projects' compliance with the MSCP SAP General Planning Policies and Design Guidelines. As demonstrated in Tables 5 and 6 (Sections 6.1.1 and 6.1.2, respectively), the Ocean Beach – Dog Beach and Sunset Cliffs projects would have compatible land uses in the MHPA and follow the General Planning Policies and Design Guidelines outlined in Section 1.4.2 of the MSCP SAP. Therefore, the Ocean Beach – Dog Beach and Sunset Cliffs projects would be consistent with the policies and requirements of the MSCP SAP, including mitigation requirements, and no impacts would result.

Since a portion of the Pilot Project occurs within the MHPA, and the Sunset Cliffs project is adjacent to it, the Ocean Beach – Dog Beach and Sunset Cliffs projects are required to document compliance with the MHPA LUAGs, including mitigation requirements based on the program-level mitigation, which may include additional project-level mitigation measures determined during subsequent project-level approval once future site-specific project designs are finalized. Table 7 (Section 6.1.3) documents the Ocean Beach – Dog Beach and Sunset Cliffs project's compliance with the MHPA LUAGs. As demonstrated in Table 7, the Ocean Beach – Dog Beach and Sunset Cliffs projects would be compliant with the MHPA LUAGs. Therefore, the Ocean Beach – Dog Beach and Sunset Cliffs projects would not introduce new land uses or cause adverse edge effects adjacent to the MHPA, and no impacts would result.

As discussed in Sections 7.2 and 7.3, implementation of the Ocean Beach – Dog Beach and Sunset Cliffs projects have the potential to introduce non-native invasive plant species into the natural open

space areas and the MHPA that occurs on the Mission Beach and Ocean Beach – Pier project sites. However, as demonstrated in Tables 5 through 7 (Sections 6.1.1 through 6.1.3, respectively), the Ocean Beach – Dog Beach and Sunset Cliffs projects would be in compliance with the MSCP SAP, including the General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the MHPA LUAGs, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, and comply with the Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) requiring all plant species installed within 100 feet of the MHPA be non-invasive. Further, the Ocean Beach – Dog Beach and Sunset Cliffs projects incorporate invasive plant species removal into habitat restoration (Mitigation Measure BIO-6). Habitat restoration per Mitigation Measure BIO-6 would establish a native plant community within any temporarily disturbed areas of native habitat, thus minimizing the potential for invasive plant species. Therefore, impacts from the introduction of invasive species of plants into a natural open space area would be less than significant with mitigation incorporated.

As discussed in Section 3.3.1, City of San Diego General Plan, the Pilot Project and Sunset Cliffs project are located in the City of San Diego and are subject to the goals and policies in the City's General Plan. The City's General Plan elements applicable to biological resources include the Conservation and Recreation Elements. Table 8 (Section 6.1.4) documents the Ocean Beach – Dog Beach; Sunset Cliffs, La Jolla Shores, Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects' consistency with the Conservation and Recreation Elements goals and policies applicable to biological resources. As demonstrated in Table 8, the Pilot Project and Sunset Cliffs project would be consistent with the City's General Plan goals and policies, including mitigation requirements. Therefore, impacts would be less than significant.

La Jolla Shores

The La Jolla Shores project site is not within or adjacent to the MHPA. However, La Jolla Shores project is adjacent to natural open space area outside of the MHPA and has the potential to introduce non-native invasive plant species into these areas. In addition, the La Jolla Shores project is bordered to the west by the La Jolla Area of Special Biological Significance (ASBS), which covers approximately 453 acres and includes La Jolla Cove and the biologically-rich kelp forests and rocky reef to the north along the coast, ending south of Scripps Pier (State Water Resources Control Board 1979). As an ASBS, the State Water Board prohibits all polluted runoff and discharges into the marine waters within the La Jolla ASBS. The La Jolla Shores project also borders a Marine Protected Areas (MPA) to the west, the Matlahuayl State Marine Reserve (SMR) (CDFW 2024c). Within the Matlahuayl SMR, which extends from the shoreline covering approximately 1.04 square miles, it is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource.

As demonstrated in Tables 5 through 7 (Sections 6.1.1 through 6.1.3, respectively), the La Jolla Shores project would be in compliance with the MSCP SAP, including the General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations. As a result of compliance with the plans and policies listed previously, the La Jolla Shores project is not anticipated generate polluted runoff and discharges into the La Jolla ASBS or harm any living, geological, or cultural marine resource in the Matlahuayl SMR.

Further, the La Jolla Shores project incorporates invasive plant species removal into habitat restoration (Mitigation Measure BIO-6). Habitat restoration per Mitigation Measure BIO-6 would establish a native plant community within any temporarily disturbed areas of native habitat, thus minimizing the potential for invasive plant species. Therefore, impacts from the introduction of invasive species of plants into a natural open space area would be less than significant with mitigation incorporated.

As discussed in Section 3.3.1, City of San Diego General Plan, the La Jolla Shores project is located in the City of San Diego and is subject to the goals and policies in the City's General Plan. The City's General Plan elements applicable to biological resources include the Conservation and Recreation Elements. Table 8 (Section 6.1.4) documents the La Jolla Shores project's consistency with the Conservation and Recreation Elements goals and policies applicable to biological resources. As demonstrated in Table 8, the La Jolla Shores project would be consistent with the City's General Plan goals and policies, including mitigation requirements. Therefore, impacts would be less than significant with mitigation incorporated.

Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park

The Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park project sites are not within or adjacent to the MHPA. However, these projects are adjacent to natural open space area outside of the MHPA and have the potential to introduce non-native invasive plant species into these areas. As demonstrated in Tables 5 through 7 (Sections 6.1.1 through 6.1.3, respectively), the Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects would be in compliance with the MSCP SAP, including the General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations. Further, the Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects incorporate invasive plant species removal into habitat restoration (Mitigation Measure BIO-6). Habitat restoration per Mitigation Measure BIO-6 would establish a native plant community within any temporarily disturbed areas of native habitat, thus minimizing the potential for invasive plant species. Therefore, impacts from the introduction of invasive

species of plants into a natural open space area would be less than significant with mitigation incorporated.

As discussed in Section 3.3.1, City of San Diego General Plan, the Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects are located in the City of San Diego and are subject to the goals and policies in the City's General Plan. The City's General Plan elements applicable to biological resources include the Conservation and Recreation Elements. Table 8 (Section 6.1.4) documents the Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects' consistency with the Conservation and Recreation Elements goals and policies applicable to biological resources. As demonstrated in Table 8, the Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park projects would be consistent with the City's General Plan goals and policies, including mitigation requirements. Therefore, impacts would be less than significant with mitigation incorporated.

7.6.3 Mitigation Measures

Pilot Project: Ocean Beach – Dog Beach; Sunset Cliffs

Implementation of Mitigation Measure BIO-6 would reduce potentially significant impacts from the introduction of invasive species of plants into a natural open space area.

La Jolla Shores

Implementation of Mitigation Measure BIO-6 would reduce potentially significant impacts from the introduction of invasive species of plants into a natural open space area.

Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park

Implementation of Mitigation Measure BIO-6 would reduce potentially significant impacts from the introduction of invasive species of plants into a natural open space area.

7.6.4 Significance After Mitigation

Pilot Project: Ocean Beach – Dog Beach; Sunset Cliffs

The potential impacts from introduction of invasive species would be avoided through compliance with the MSCP SAP General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the MHPA LUAGs, and the Landscape Regulations (Land Development Code 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) requiring all plant species installed within 100 feet of the MHPA be non-invasive and further mitigated through implementation of Mitigation Measure BIO-6.

La Jolla Shores

The potential impacts from introduction of invasive species would be avoided through compliance with the MSCP SAP General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, and further mitigated through implementation of Mitigation Measure BIO-6.

Mission Beach, Ocean Beach – Pier, and Pacific Beach – Tourmaline Surf Park

The potential impacts from introduction of invasive species would be avoided through compliance with the MSCP SAP General Management Directives, ASMDs, and General Planning Policies and Design Guidelines, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2012b), and NPDES regulations, and further mitigated through implementation of Mitigation Measure BIO-6.

7.7 Cumulative Impacts

7.7.1 Cumulative Threshold 1: Sensitive Plant and Wildlife Species

The cumulative projects area specific to biological resources was defined by nearby surrounding areas with similar biological resources. Cumulative projects in the vicinity of the proposed CRMP Phase 1 area would have the potential to result in impacts to sensitive plant and wildlife species, including loss of habitat. All projects proposed in the City are required to comply with CEQA. Two projects proposed in the cumulative survey area include the De Anza Natural Amendment to the Mission Bay Park Master Plan and Mission Bay Park Improvement Plan. Similar to the proposed CRMP Phase 1, these cumulative projects are primarily in previously developed areas and include portions of undeveloped open space along the coast in the City. Implementation of these two cumulative projects have the potential to result in impacts to sensitive plant and wildlife species. However, like the proposed CRMP Phase 1, these cumulative projects are within the MSCP SAP and are required to limit impacts and comply with the biological resource conservation goals of the MSCP.

The MSCP is a long-term regional conservation plan established to protect sensitive species and habitats in the County. The MSCP is divided into subarea plans that are implemented separately from one another. The survey area is within the MSCP SAP and partially inside the MHPA.

In an effort to eliminate cumulative impacts to sensitive biological resources throughout San Diego, the City is participating in a regional conservation planning effort, MSCP SAP. This planning effort is designed to address cumulative impacts through development of a regional plan that addresses impacts to covered species and habitats in a manner that assures their conservation despite impacts of cumulative projects over the long term. The ultimate goal of this plan is the establishment of biological

reserve areas in conformance with the State of California Natural Community Conservation Planning Act. In addition to being signatory to the Natural Community Conservation Planning Act, the MSCP SAP is also an adopted Habitat Conservation Plan under Section 10 of FESA.

As previously discussed in Section 3.3.4.1, City of San Diego Multiple Species Conservation Program Subarea Plan, the proposed CRMP Phase 1 area lies within the urban area of the MSCP SAP boundary. The MHPA is a "hard line" preserve developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997).

Preservation and restoration of habitat, planning in accordance with the biological resource conservation goals of the MSCP SAP, and limitation of impacts in accordance with the MSCP SAP are intended to mitigate cumulative biological resource impacts. Although most of the proposed CRMP Phase 1 area includes wetland buffers within the COZ, and some (the Ocean Beach – Dog Beach and Sunset Cliffs projects) inside or adjacent to the City's designated MHPA boundary, the habitat protection and restoration activities proposed in these areas would be considered compatible uses within COZ wetland buffers (i.e., restoration project) and inside the MHPA boundary, in accordance with the City's Biology Guidelines and Section 143.0130 of City's LDC ESL regulations. The proposed CRMP's demonstrated consistency with the MSCP SAP through project design and incorporation of mitigation measures is provided in Section 7.6.2. In addition, since construction the Ocean Beach – Dog Beach and Sunset Cliffs projects would occur within and/or adjacent to the MHPA, the projects are required to demonstrate consistency with the MSCP SAP and MHPA LUAGs (provided in Tables 5 through 7 in Sections 6.1.1 through 6.1.3). Therefore, the proposed CRMP Phase 1 would be consistent with the MSCP SAP, and cumulative impacts to sensitive plant and wildlife species would be less than significant with mitigation incorporated.

7.7.2 Cumulative Threshold 2: Sensitive Vegetation Communities

As discussed in Section 7.10.1, the proposed CRMP's demonstrated consistency with the MSCP SAP, MHPA LUAGs, the City's Biology Guidelines, and City's LDC ESL regulations (provided in Tables 5 through 7 in Sections 6.1.1 through 6.1.3) ensures the project, in combination with other cumulative projects within the City, would not result in cumulatively considerable impacts to biological resources, specifically sensitive vegetation communities. In fact, the proposed CRMP Phase 1 would provide a net benefit to the vegetation communities in the survey area by protecting and restoring the functions of natural wetland, aquatic, and adjacent habitats. Therefore, because the proposed CRMP Phase 1 minimizes impacts to sensitive vegetation communities and demonstrates consistency with the MSCP SAP requirements, the proposed CRMP Phase 1 would not result in a cumulatively considerable impact to sensitive vegetation communities.

7.7.3 Cumulative Threshold 3: Jurisdictional Aquatic Resources

As discussed in Section 7.10.1, the proposed CRMP's demonstrated consistency with the MSCP SAP, MHPA LUAGs, the City's Biology Guidelines, and City's LDC ESL regulations (provided in Tables 5 through 7 in Sections 6.1.1 through 6.1.3) ensures the project, in combination with other cumulative projects within the City, would not result in cumulatively considerable impacts to biological resources, specifically jurisdictional aquatic resources. In fact, the proposed CRMP Phase 1 would provide a net benefit to the functions and values of the jurisdictional aquatic resources in the survey area by protecting and restoring the functions of natural wetland and non-wetland waters. In addition, all cumulative projects with potential impacts to jurisdictional aquatic resources would be required to comply with applicable federal and/or state regulations that ensure no net loss of resources, such as Section 404 of the federal CWA, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the CFGC, and Porter-Cologne. Therefore, because the proposed CRMP Phase 1 minimizes impacts to jurisdictional aquatic resources, demonstrates consistency with the MSCP SAP requirements, and would comply with federal and state permitting regulations, the proposed CRMP Phase 1 would not result in a cumulatively considerable impact to jurisdictional aquatic resources.

7.7.4 Cumulative Threshold 4: Wildlife Corridors and Habitat Linkages

As discussed in Section 7.10.1, the proposed CRMP's demonstrated consistency with the MSCP SAP, MHPA LUAGs, the City's Biology Guidelines, and City's LDC ESL regulations (provided in Tables 5 through 7 in Sections 6.1.1 through 6.1.3) ensures the proposed CRMP Phase 1, in combination with other cumulative projects within the City, would not result in cumulatively considerable impacts to biological resources. In fact, the proposed CRMP Phase 1 would provide a long-term benefit for wildlife movement through the survey area. Therefore, because the proposed CRMP Phase 1 minimizes impacts to wildlife movement and demonstrates consistency with the MSCP SAP requirements, the proposed CRMP Phase 1 would not result in a cumulatively considerable impact to wildlife corridors and habitat linkages.

7.7.5 Cumulative Threshold 5: Habitat Conservation Plans

As discussed in Section 7.10.1, the proposed CRMP's demonstrated consistency with the MSCP SAP, MHPA LUAGs, the City's Biology Guidelines, and City's LDC ESL regulations (provided in Tables 5 through 7 in Sections 6.1.1 through 6.1.3) ensures the proposed CRMP Phase 1, in combination with other cumulative projects within the City, would not result in cumulatively considerable impacts to biological resources. In fact, the proposed CRMP Phase 1 would provide a net benefit to the biological resources in the survey area by removing invasive plant species and restoring temporary impacts using native plant communities, thus minimizing the potential for invasive plant species in the survey area. Further, the proposed CRMP Phase 1 demonstrates consistency with the City of San Diego General Plan Conservation and Recreation Elements goals

and policies applicable to the project. Therefore, because the proposed CRMP Phase 1 minimizes impacts from invasive species and demonstrates consistency with the MSCP SAP and MHPA LUAGs requirements, the proposed CRMP Phase 1 would not result in a cumulatively considerable impact from adverse edge effects or invasive species introduction due to conflict with the provisions of the MSCP, VPHCP, other adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan.

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Section 8 References

American Ornithological Society. 2018. "Checklist of North and Middle American Birds: List of the 2,127 Bird Species Known from the A.O.U. Check-List Area." Accessed November 2024. http://checklist.aou.org/.

Baldwin, B.G, D.H. Goldman, D.J Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken. 2012. The Jepson Manual: Higher Plants of California. University of California Press. Berkeley, California. January.

Calflora. 2024. Calflora Database. Accessed November 2024. https://www.calflora.org/cgi-in/species_query.cgi?where-calrecnum=4428.

CaliforniaHerps. 2024. "A Guide to the Amphibians and Reptiles of California." Accessed November 2024. http://www.californiaherps.com.

Cal-IPC (California Invasive Plant Council). 2024. Invasive Plant Inventory. Accessed November 2024. https://www.cal-ipc.org/plants/inventory/.

CDFW (California Department of Fish and Wildlife). 2024a. Biogeographic Information and Observation System Database. Accessed November 2024. https://wildlife.ca.gov/Data/BIOS.

CDFW. 2024b. California Natural Diversity Database. State and Federally Listed Endangered, Threatened, and Rare Plants of California. April. Accessed November 2024. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390&inline.

CDFW. 2024c. Matlahuayl State Marine Reserve and San Diego-Scripps Coastal State Marine Conservation Area. Accessed November 2024. https://wildlife.ca.gov/Conservation/Marine/MPAs/San-Diego-Scripps-Coastal-Matlahuayl.

CNPS (California Native Plant Society). 2024. Rare Plant (online edition). Version v-9.5. Accessed November 2024. http://www.rareplants.cnps.org/.

City of San Diego. 1997. City of San Diego Final MSCP SAP. Prepared by the City of San Diego Community and Economic Development Department. March.

City of San Diego. 2012a. San Diego Municipal Code, Land Development Code—Biology Guidelines and Landscape Regulations.

City of San Diego. 2012b. Stormwater Standards Manual. January 20, 2012. Accessed November 2024. https://www.sandiego.gov/sites/default/files/legacy/thinkblue/pdf/stormwatermanual.pdf.

City of San Diego. 2018. Land Development Code: Biology Guidelines.

City of San Diego. 2022. California Environmental Quality Act Significance Determination Thresholds, City of San Diego. September.

City of San Diego. 2024. City of San Diego General Plan Land Use and Community Planning Element. Accessed November 2024. https://www.sandiego.gov/sites/default/files/2024-08/general-plan_02_land-use_july-2024_updated.pdf.

County of San Diego. 1998. County of San Diego MSCP Plan. Final Multiple Species Conservation Program. Approved August.

County of San Diego. 2011. "Section 2.6 Geology and Soils." In San Diego County General Plan Update EIR. August 2011. Accessed November 2024. http://www.sandiegocounty.gov/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_2.06_-_Geology_2011.pdf.

Crother, B.I. 2012. Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in our Understanding, edited by J.J. Moriarty. 7th ed. Society for the Study of Amphibians and Reptiles (SSAR); Herpetological Circular no. 39. August 2012. Accessed November 2024. http://home.gwu.edu/~rpyron/publications/Crother_et_al_2012.pdf.

Faulkner, D., and M. Klein. 2024. "Sensitive Butterflies of San Diego." Accessed November 2024. http://flite-tours.com/downloads/San%20Diego%20Sensitive%20Butterfly%20Workshop%20Booklet.pdf.

Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, the Resources Agency, Department of Fish and Wildlife, Natural Heritage Division. October.

Jepson Online. 2023. "The Jepson Herbarium." Accessed November 2024. https://ucjeps.berkeley.edu/eflora/.

Moyle, P.B. 2002. Inland Fishes of California. Revised and expanded. Berkeley and Los Angeles, California, and London, England: University of California Press.

NRCS (Natural Resources Conservation Service). 2024. National Water and Climate Center: WETS Table. Accessed November 2024. http://agacis.rcc-acis.org/.

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, PhD, October 1986. Codes revised by Thomas Oberbauer in February 1996, revised and expanded by Meghan Kelly in August 2006, and further revised and reorganized by Jeremy Buegge in March 2008. Accessed November 2024. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rtcref/ch9.0/rtcrefaletters/O14%202014-12-19_OberbauerTM2008.pdf.

Project Clean Water. 2024. San Diego County Watersheds. Accessed November 2024. https://projectcleanwater.org/watersheds/.

SanGIS. 2024. San Diego Geographic Information Source. Accessed November 2024. https://www.sangis.org/.

SDNHM (San Diego Natural History Museum). 2002. "Butterflies of San Diego County." Revised September 2002. Accessed November 2024. http://www.sdnhm.org/archive/research/entomology/sdbutterflies.html.

SDNHM. 2017. San Diego County Mammal Atlas. Prepared by Scott Tremor, Drew Stokes, Wayne Spencer, Jay Diffendorfer, Howard Thomas, Susan Chivers, and Phillip Unitt (eds.). August 1.

SDNHM (San Diego Natural History Museum). 2022. San Diego County Plant Atlas. Accessed November 2024. https://www.sdplantatlas.org/.

State Water Resources Control Board. 1979. California Marine Waters Areas of Special Biological Significance – Reconnaissance Survey Report. Accessed November 2024. https://www.waterboards.ca.gov/publications_forms/publications/general/docs/asbs_sd_lajolla.pdf.

Tremor, Scott, Drew Stokes, Wayne Spencer, Jay Diffendorfer, Howard Thomas, Susan Chivers, and Philip Unitt, eds. 2017. San Diego County Mammal Atlas. August 1.

Unitt, P., A.E. Klovstad, W.E. Haas, and P.J. Mock. 2004. San Diego County Bird Atlas. Proceedings of the San Diego Society of Natural History 39. San Diego, California: San Diego Society of Natural History.

USDA (U.S. Department of Agriculture). 2024. Web Soil Survey of San Diego County Area, California. Accessed November 2024. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

USFWS (U.S. Fish and Wildlife Service). 2021. "Assessing the Status of the Monarch Butterfly." Last updated January 26. Accessed November 2024. https://www.fws.gov/savethemonarch/SSA.html.

USFWS. 2024a. National Wetland Inventory Wetland Mapper. Accessed November 2024. https://www.fws.gov/wetlands/Data/Mapper.html.

USFWS. 2024b. Information for Planning and Consultation. Accessed November 2024. https://ipac.ecosphere.fws.gov/location/index.

USGS (U.S. Geological Survey). 2024. National Hydrologic Dataset. Accessed November 2024. vhttps://www.arcgis.com/home/webmap/viewer.html?url=https://hydro.nationalmap.gov/arcgis/rest/services/nhd/MapServer&source=sd.

Wilson, D.E., and D.M. Reeder, eds. 2005. Mammal Species of the World: A Taxonomic and Geographic Reference. 3rd ed. Baltimore, Maryland: Johns Hopkins University Press.

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Appendix A. Figures

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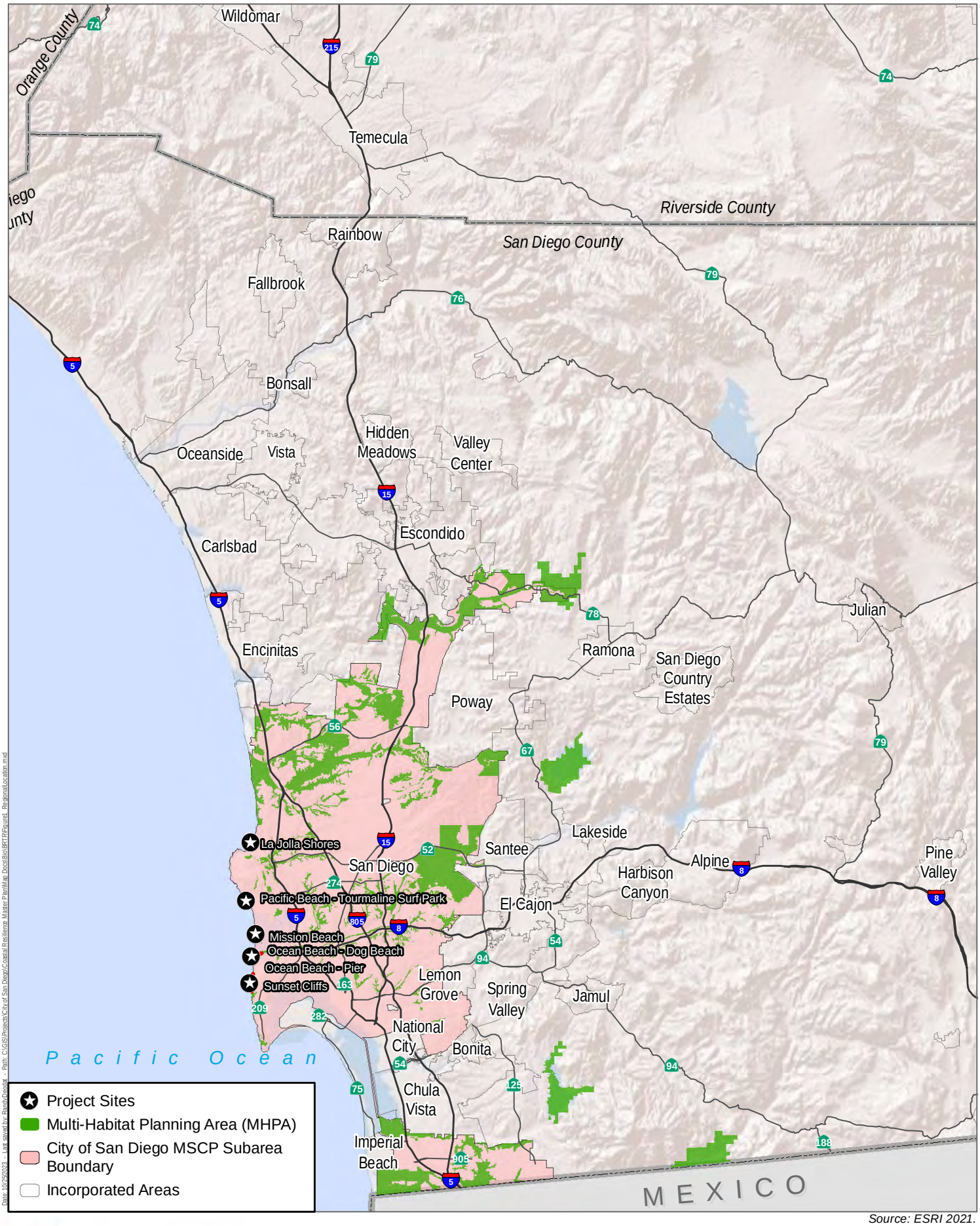

Source: ESRI 2021.

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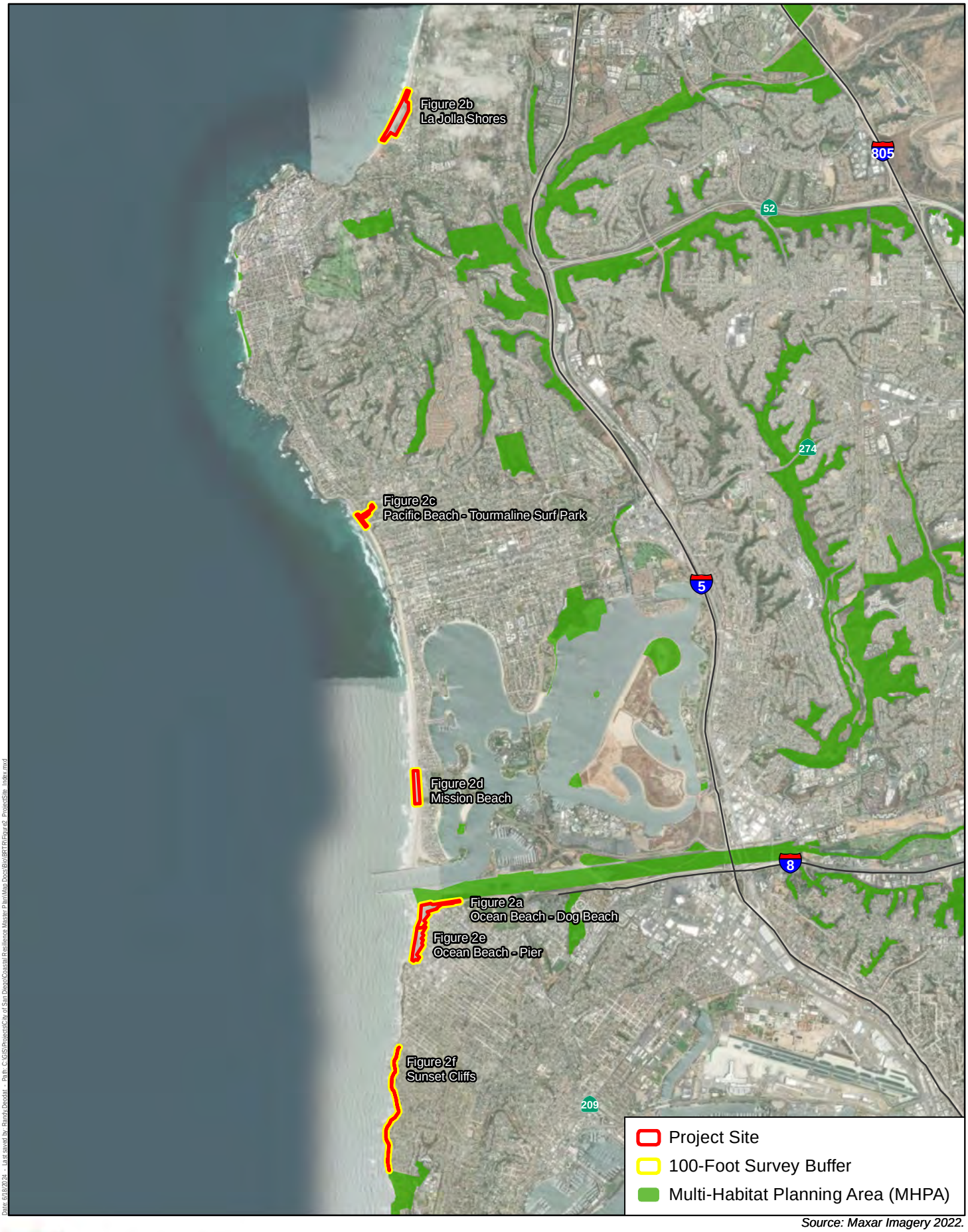
Figure 1

Regional Location

Coastal Resilience Master Plan



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Harris & Associates

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Figure 2

Project Sites - Index

Coastal Resilience Master Plan

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Source: Maxar Imagery 2022.

Harris & Associates

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Figure 2a

Project Sites

Coastal Resilience Master Plan - Ocean Beach - Dog Beach

Source: Maxar Imagery 2022.

Harris & Associates

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Figure 2b

Project Sites

Coastal Resilience Master Plan - La Jolla Shores

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Source: Maxar Imagery 2022.

Harris & Associates

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Figure 2c

Project Sites

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

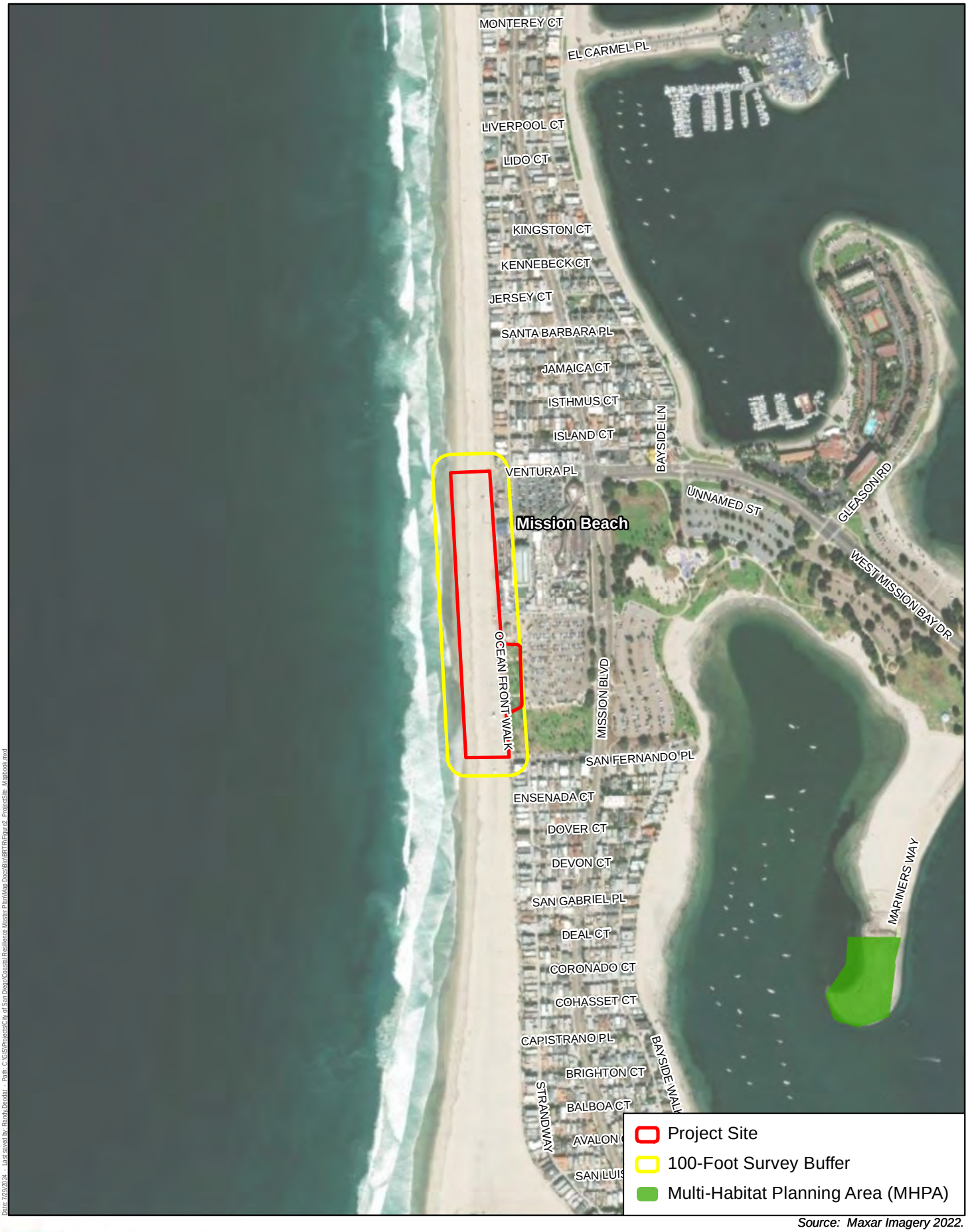

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Figure 2d

Project Sites

Coastal Resilience Master Plan - Mission Beach

Source: Maxar Imagery 2022.

Harris & Associates

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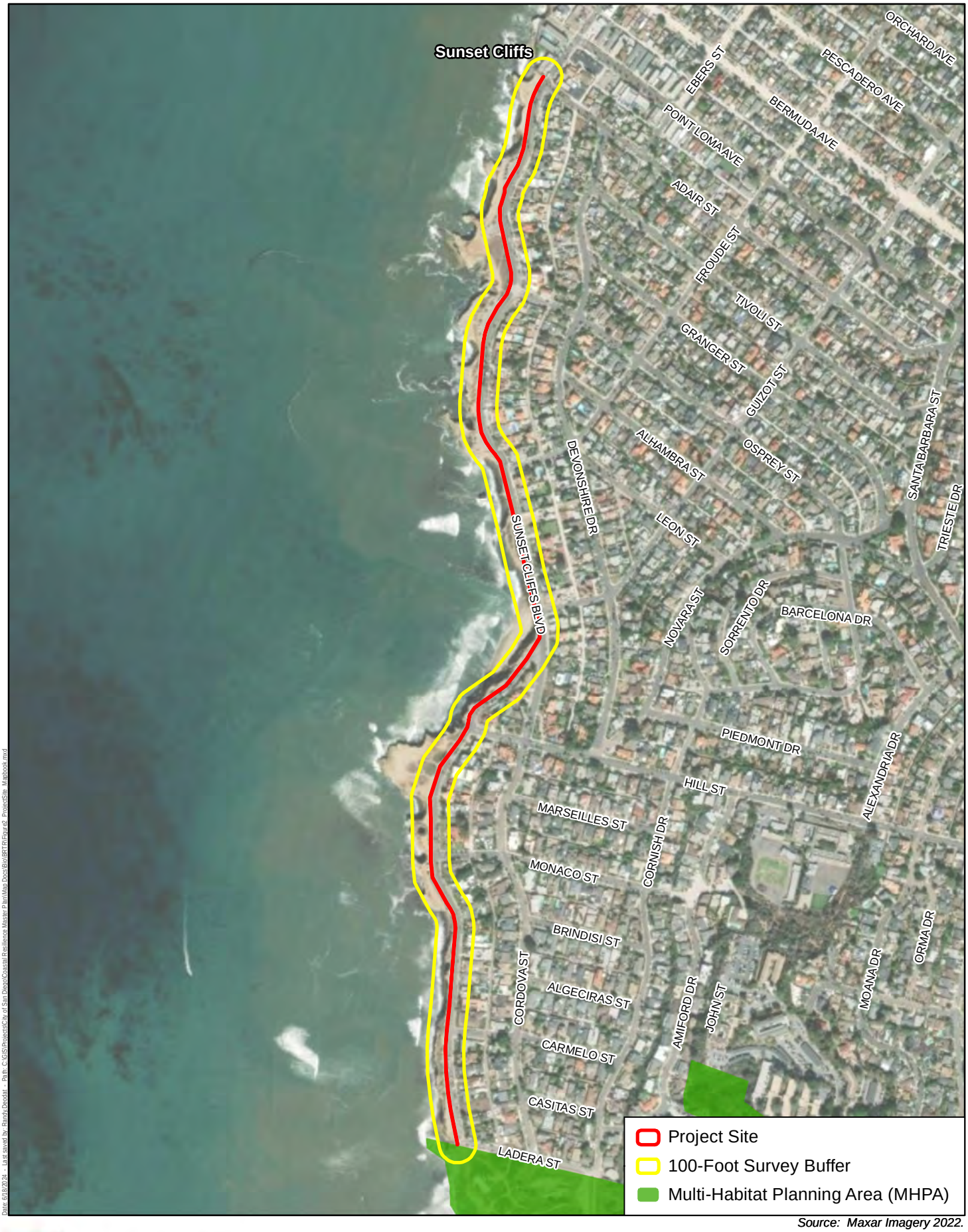
Figure 2e

Project Sites

Coastal Resilience Master Plan - Ocean Beach - Pier



Source: Maxar Imagery 2022.

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Figure 2f

Project Sites

Coastal Resilience Master Plan - Sunset Cliffs

Source: USGS La Jolla and Point Loma 7.5 Minute Quadrangles 1975.

Harris & Associates

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Figure 3

USGS Topographic Map - Index

Coastal Resilience Master Plan

Source: USGS La Jolla and Point Loma 7.5 Minute Quadrangles 1975.

Harris & Associates

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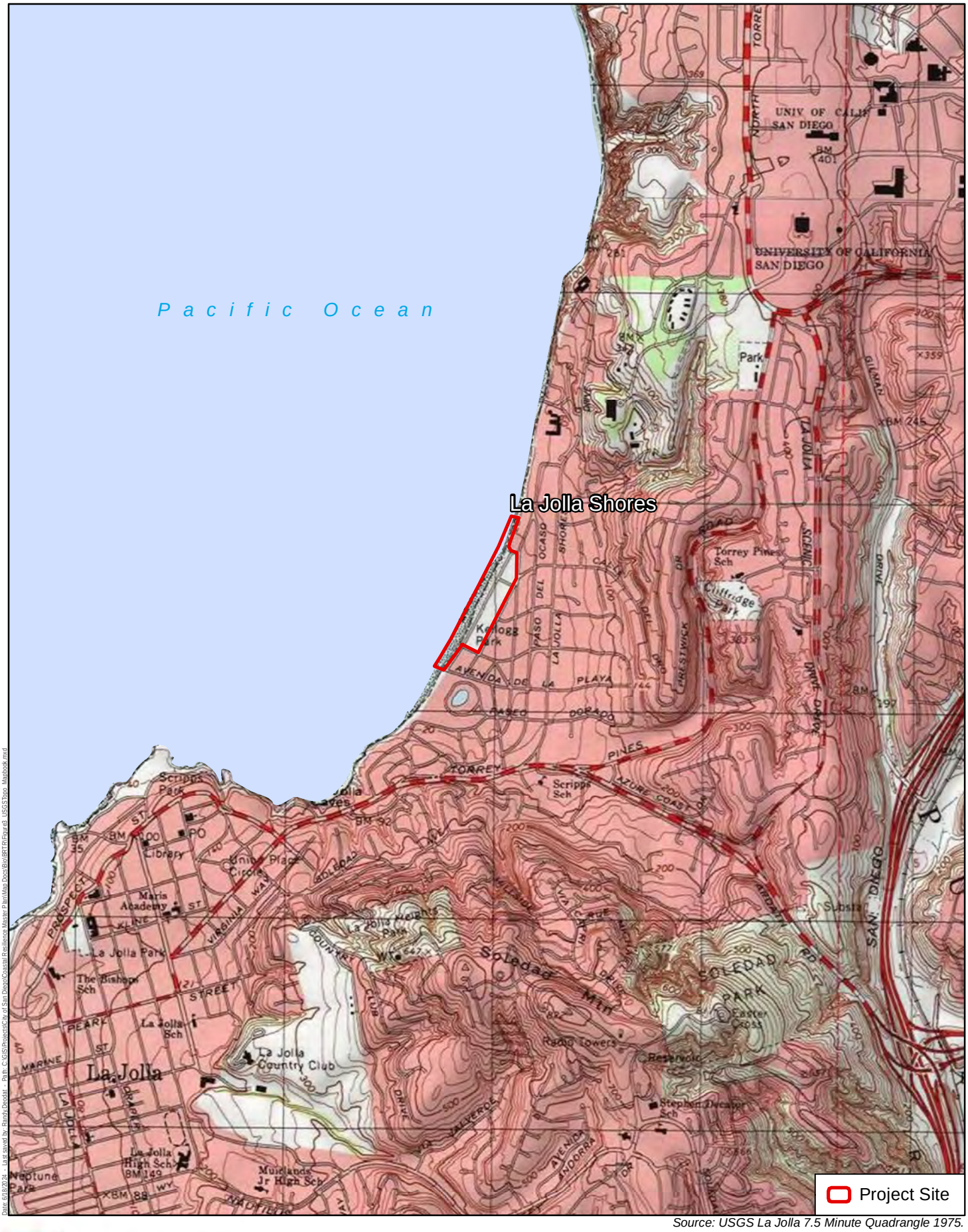
Figure 3a

USGS Topographic Map

Coastal Resilience Master Plan - Ocean Beach - Dog Beach



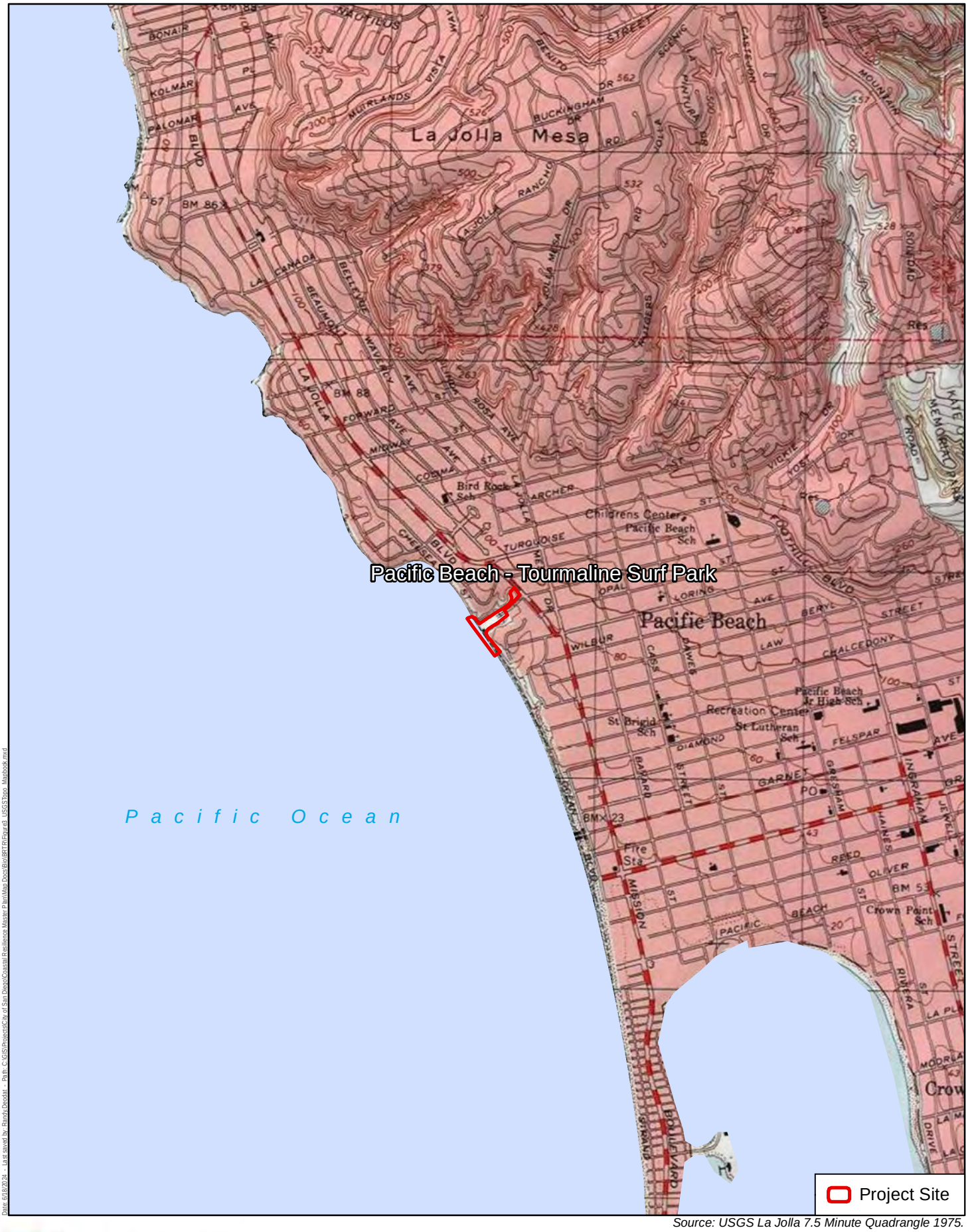
Source: USGS La Jolla 7.5 Minute Quadrangle 1975.

Harris & Associates

Figure 3b

USGS Topographic Map

Coastal Resilience Master Plan - La Jolla Shores



Source: USGS La Jolla 7.5 Minute Quadrangle 1975.

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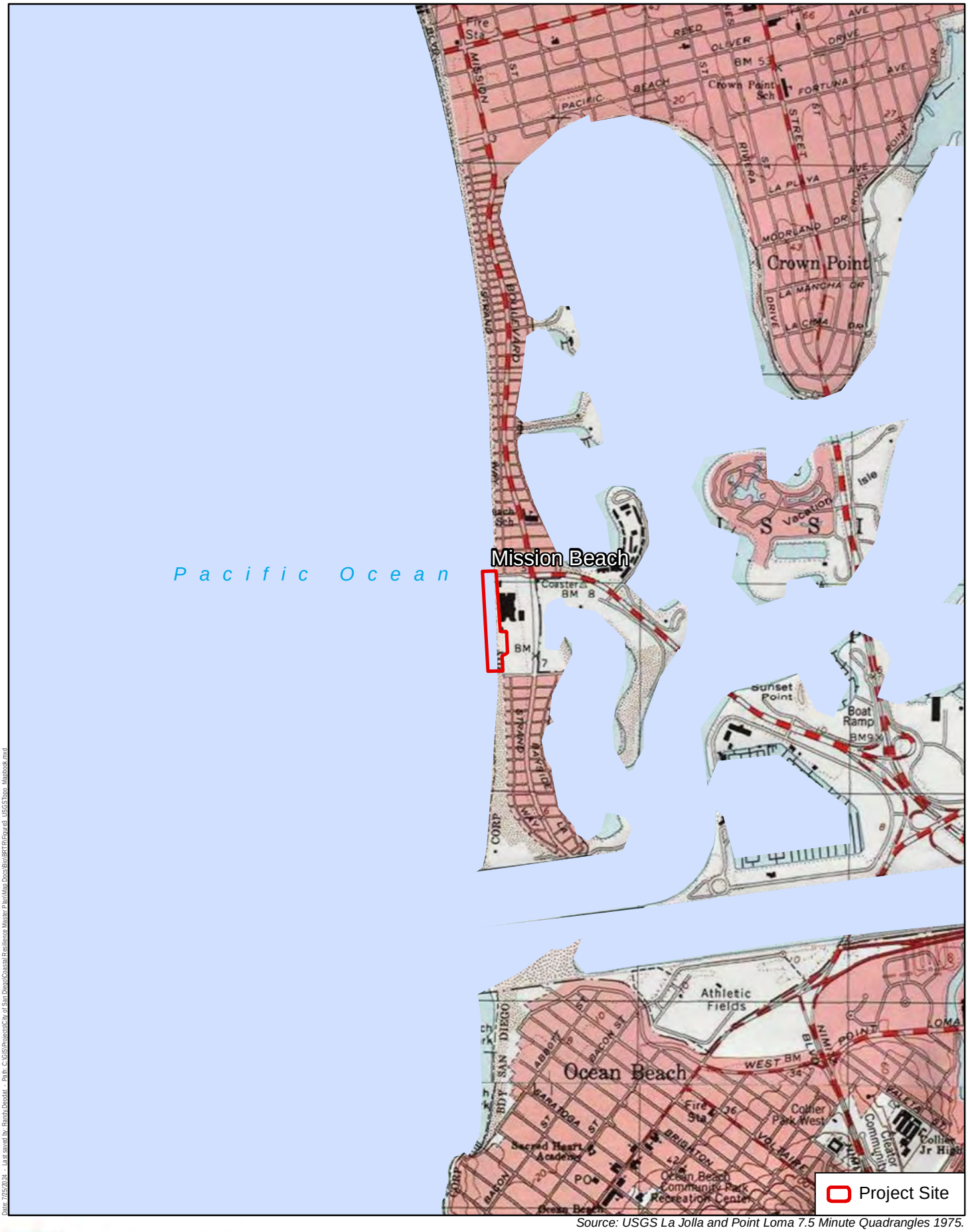
Figure 3c

USGS Topographic Map

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park



Source: USGS La Jolla and Point Loma 7.5 Minute Quadrangles 1975.

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Figure 3d

USGS Topographic Map

Coastal Resilience Master Plan - Mission Beach

Source: USGS La Jolla and Point Loma 7.5 Minute Quadrangles 1975.

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Figure 3e

USGS Topographic Map

Coastal Resilience Master Plan - Ocean Beach - Pier

Source: USGS La Jolla and Point Loma 7.5 Minute Quadrangles 1975.

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Figure 3f

USGS Topographic Map

Coastal Resilience Master Plan - Sunset Cliffs

Source: USDA 1973; Maxar Imagery 2022.

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Figure 4

Soils - Index

Coastal Resilience Master Plan

Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4a

Soils

Coastal Resilience Master Plan - Ocean Beach - Dog Beach

Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4b

Soils

Coastal Resilience Master Plan - La Jolla Shores

Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4c

Soils

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

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Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4d

Soils

Coastal Resilience Master Plan - Mission Beach

Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4e

Soils

Coastal Resilience Master Plan - Ocean Beach - Pier

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Source: USDA 1973; Maxar Imagery 2022.

Harris & Associates

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Figure 4f

Soils

Coastal Resilience Master Plan - Sunset Cliffs

Source: USGS Hydrology Database; USFWS 2023; Maxar Imagery 2022.

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Figure 5

Hydrology - Index

Coastal Resilience Master Plan

Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

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Figure 5a

National Wetlands Inventory Results

Coastal Resilience Master Plan - Ocean Beach - Dog Beach

Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

Harris & Associates

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Figure 5b

National Wetlands Inventory Results

Coastal Resilience Master Plan - La Jolla Shores

Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

Harris & Associates

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Figure 5c

National Wetlands Inventory Results

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

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Figure 5d

National Wetlands Inventory Results

Coastal Resilience Master Plan - Mission Beach

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Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

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Figure 5e

National Wetlands Inventory Results

Coastal Resilience Master Plan - Ocean Beach - Pier

Source: USGS National Hydrology Dataset 2023; USFWS 2023; Maxar Imagery 2022.

Harris & Associates

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Figure 5f

National Wetlands Inventory Results

Coastal Resilience Master Plan - Sunset Cliffs

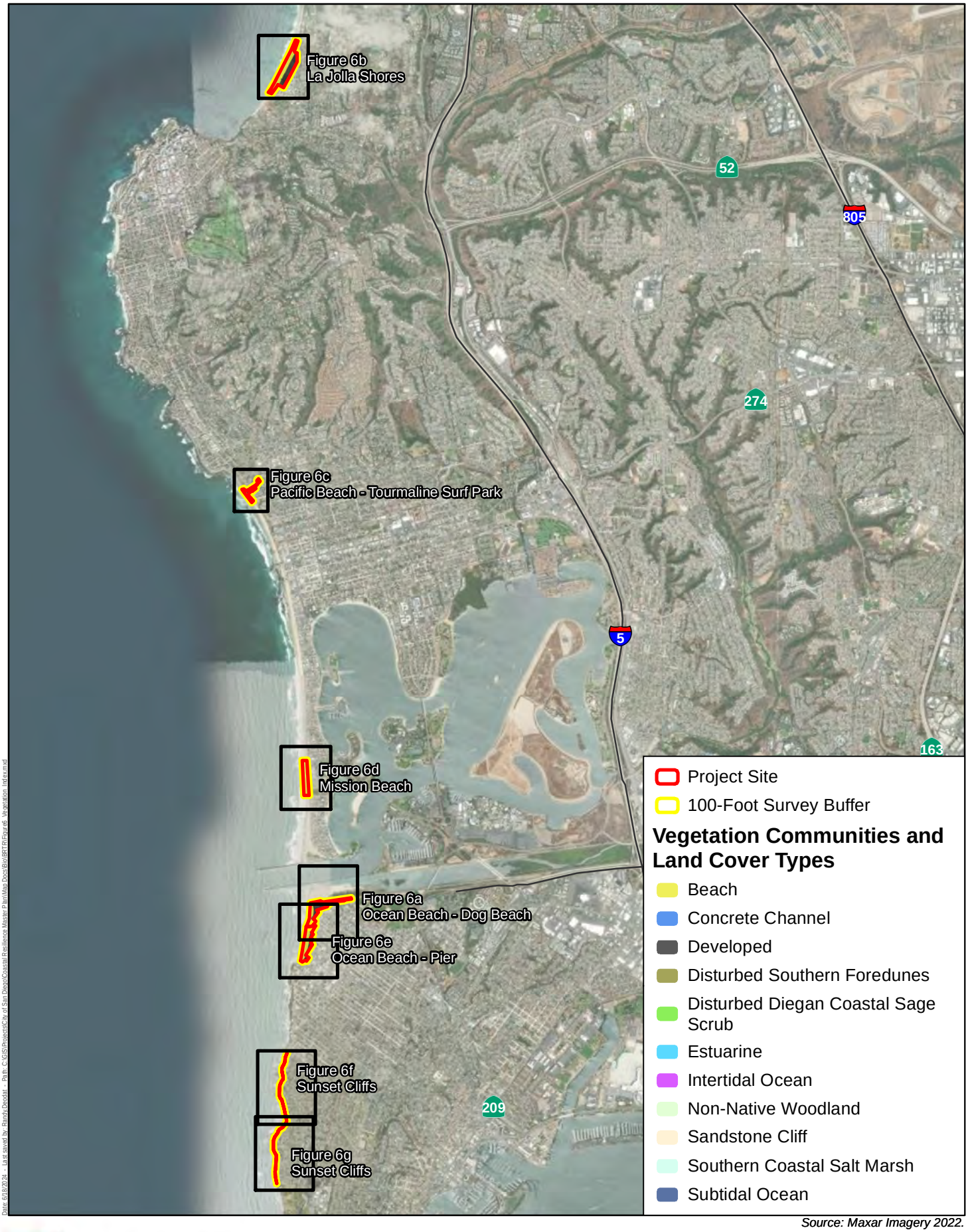

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Figure 6

Vegetation Communities and Land Cover Types - Index

Coastal Resilience Master Plan

Source: Maxar Imagery 2022.

Harris & Associates

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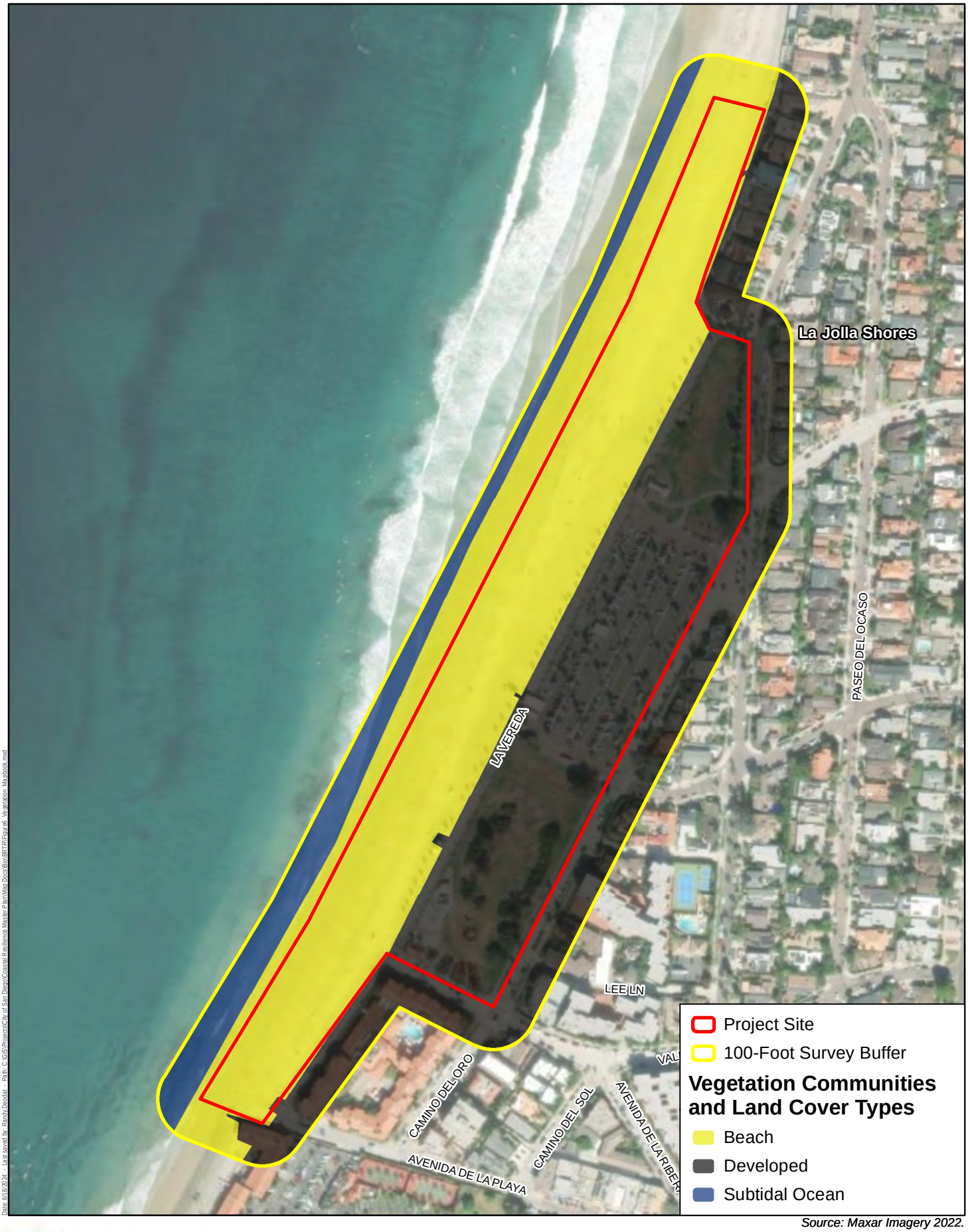
Figure 6a

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Ocean Beach - Dog Beach



Source: Maxar Imagery 2022.

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Figure 6b

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - La Jolla Shores

Source: Maxar Imagery 2022.

Harris & Associates

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Figure 6c

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

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Figure 6d

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Mission Beach

Source: Maxar Imagery 2022.

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Figure 6e

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Ocean Beach - Pier

Source: Maxar Imagery 2022.

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Figure 6f

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Sunset Cliffs (North)

Source: Maxar Imagery 2022.

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Figure 6g

Vegetation Communities and Land Cover Types

Coastal Resilience Master Plan - Sunset Cliffs (South)

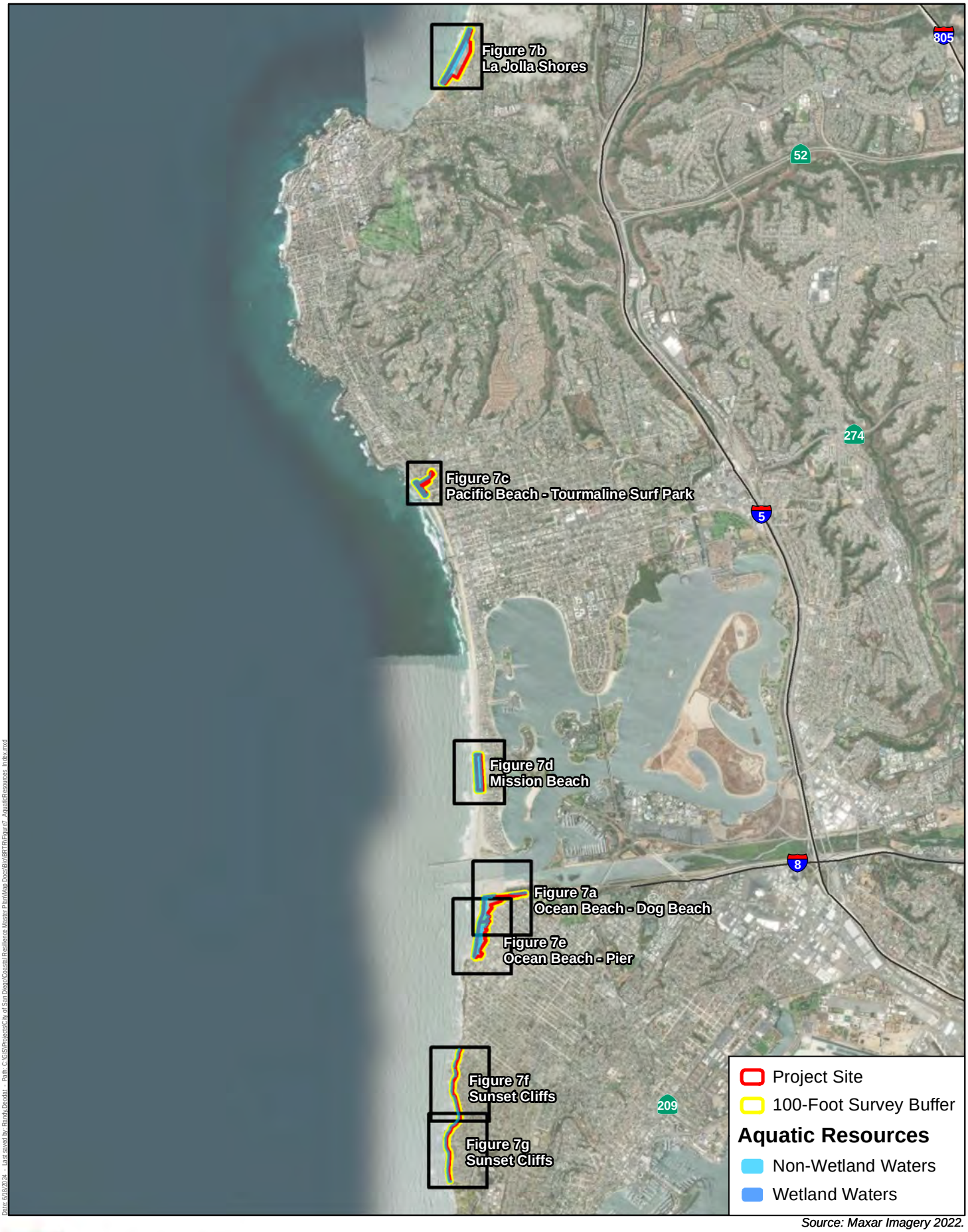

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Figure 7

Jurisdictional Aquatic Resources - Index

Coastal Resilience Master Plan

Source: Maxar Imagery 2022.

Harris & Associates

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Figure 7a

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Ocean Beach - Dog Beach

Source: Maxar Imagery 2022.

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Figure 7b

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - La Jolla Shores

Source: Maxar Imagery 2022.

Harris & Associates

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Figure 7c

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

Source: Maxar Imagery 2022.

Harris & Associates

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Figure 7d

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Mission Beach

Source: Maxar Imagery 2022.

Harris & Associates

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0 150 300

Feet

Figure 7e

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Ocean Beach - Pier

Source: Maxar Imagery 2022.

Harris & Associates

N

0 150 300

Feet

Figure 7f

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Sunset Cliffs (North)

Source: Maxar Imagery 2022.

Harris & Associates

N

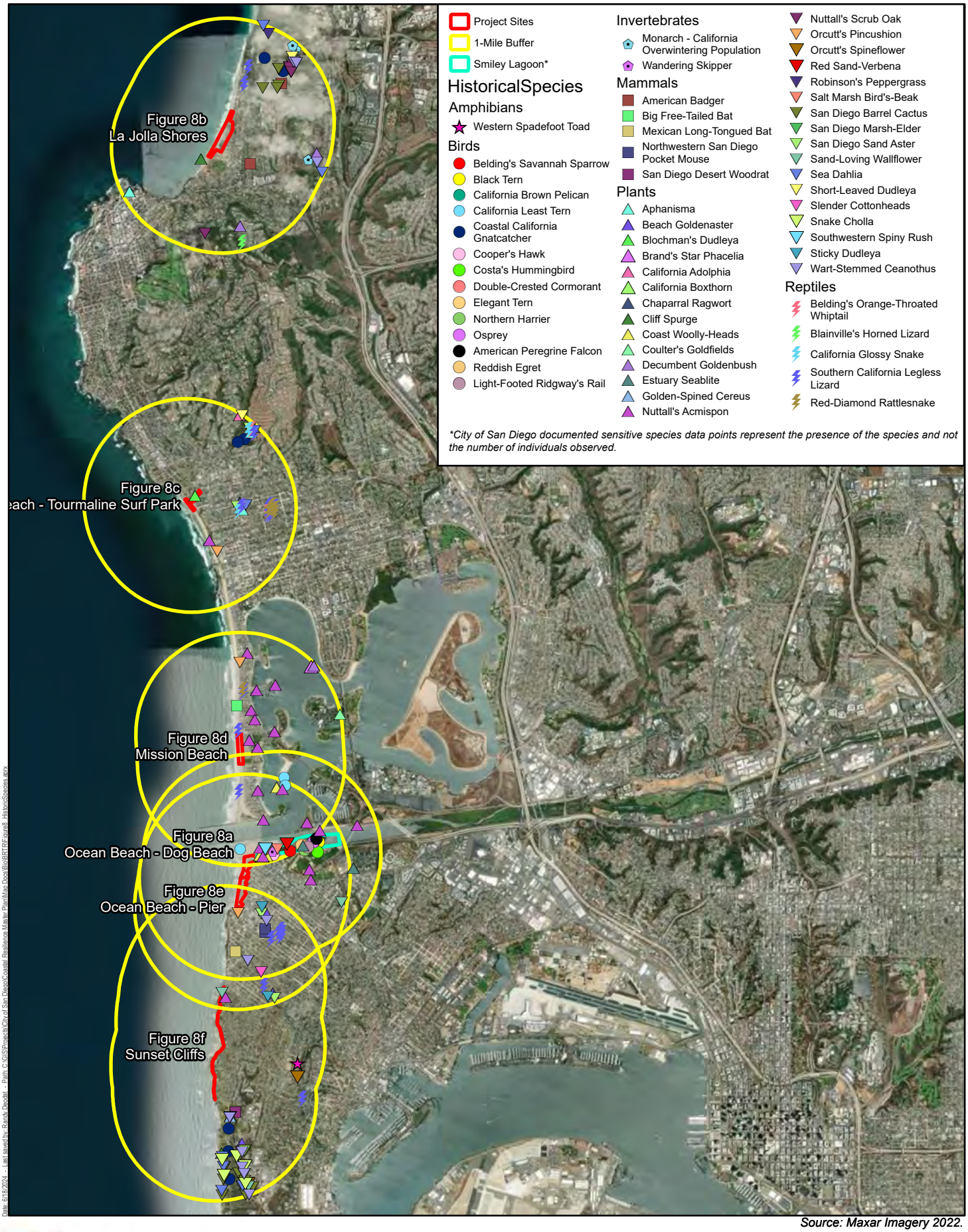
0 150 300

Feet

Figure 7g

Jurisdictional Aquatic Resources

Coastal Resilience Master Plan - Sunset Cliffs (South)



Source: Maxar Imagery 2022.

Harris & Associates

N

0 0.5 1

Miles

Figure 8

Sensitive Species with Potential to Occur - Index

Coastal Resilience Master Plan

Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 8a

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - Ocean Beach - Dog Beach

Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 8b

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - La Jolla Shores

Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 8c

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - Pacific Beach - Tourmaline Surf Park

Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

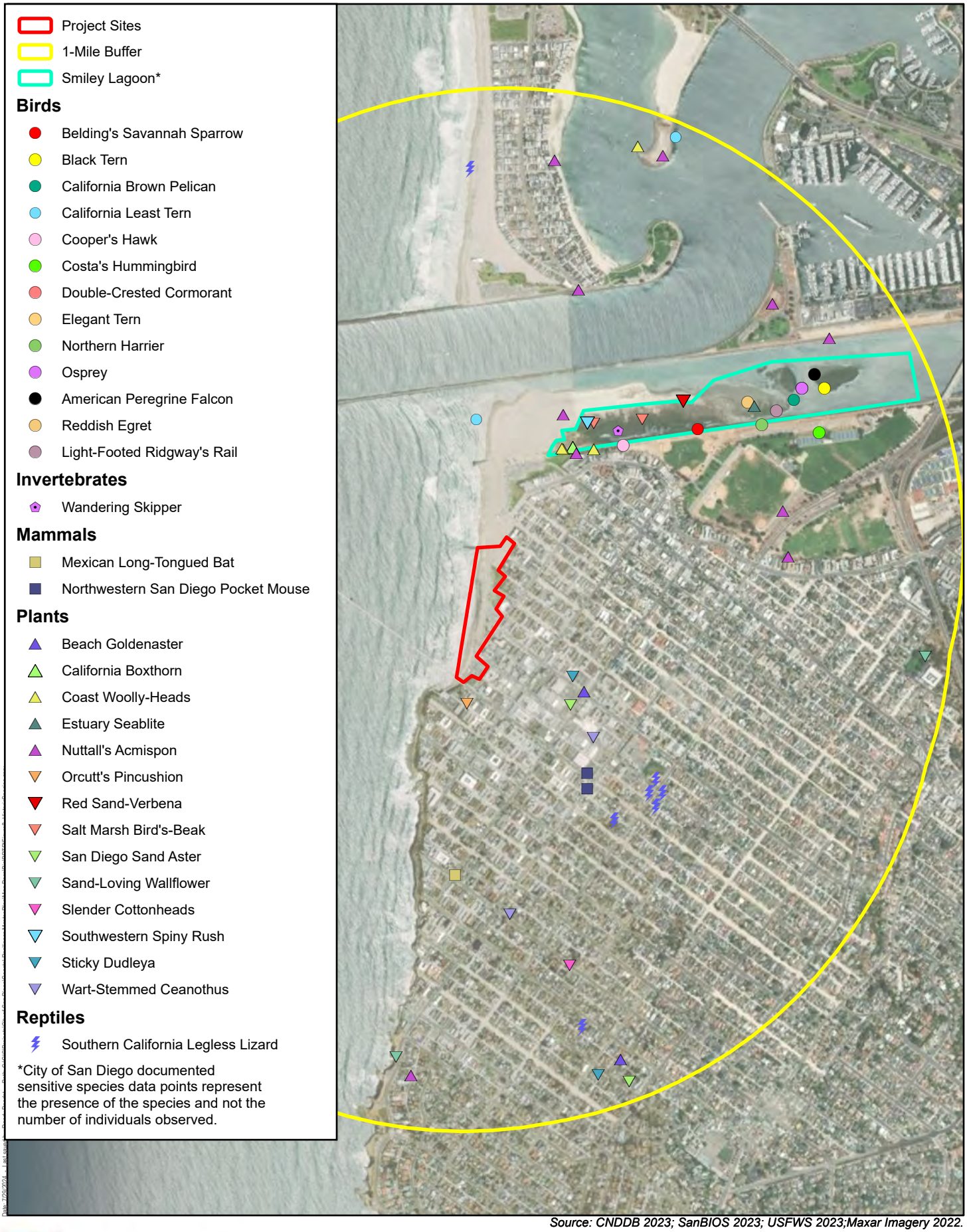
0 1,000 2,000

Feet

Figure 8d

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - Mission Beach



Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 8e

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - Ocean Beach - Pier

Source: CNDDB 2023; SanBIOS 2023; USFWS 2023;Maxar Imagery 2022.

Harris & Associates

N

0 1,000 2,000

Feet

Figure 8f

Sensitive Species with Potential to Occur

Coastal Resilience Master Plan - Sunset Cliffs

Source: Maxar Imagery 2022.

Harris & Associates

N

0 0.5 1

Miles

Figure 9

Sensitive Species Observed

Coastal Resilience Master Plan

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Appendix B. Species Observed

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Plant Species Observed

Scientific Name	Common Name
Vascular Species	
Dicots	
Aizoaceae	**Fig-Marigold Family**
Carpobrotus edulis[1]	Ice plant
Mesembryanthemum crystallinum[1]	Common iceplant
Mesembryanthemum nodiflorum[1]	Slenderleaf iceplant
Anacardiaceae	**Sumac or Cashew Family**
Rhus ovata	Sugarbush
Asteraceae	**Sunflower Family**
Artemisia californica	California sagebrush
Encelia californica	California brittle bush
Erigeron canadensis	Canada horseweed
Gazania linearis[1]	Treasure flower
Glebionis coronaria[1]	Crown daisy
Isocoma menziesii	Coastal goldenbush
Sonchus asper subsp. *asper*[1]	Prickly sow-thistle
Sonchus oleraceus	Common sowthistle
Boraginaceae	**Borage Family**
Amsinckia intermedia	Common fiddleneck
Brassicaceae	**Mustard Family**
Brassica nigra[1]	Black mustard
Cakile maritima[1]	European searocket
Cakile sp.	Searocket
Cactaceae	**Cactus Family**
Opuntia littoralis	Coastal prickly pear
Caryophyllaceae	**Pink Family**
Limonium sp.	Sea lavender
Chenopodiaceae	**Goosefoot Family**
Atriplex canescens	Fourwing saltbush
Chenopodium album[1]	White goosefoot
Salicornia pacifica	Pickleweed
Salsola australis[1]	Russian thistle
Salsola sp.	Thistle
Suaeda sp.	Seablite
Cleomaceae	**Spiderflower Family**
Peritoma arborea	Bladderpod spiderflower
Fabaceae	**Legume Family**
Acmispon prostratus[CRPR1B.1]	Nuttall's acmispon
Melilotus albus[1]	White sweetclover

Plant Species Observed

Scientific Name	Common Name
Frankeniaceae	**Heath Family**
Frankenia salina	Alkali heath
Geraniaceae	**Geranium Family**
Geranium sp.	Geranium
Malvaceae	**Mallow Family**
Malacothamnus fasciculatus	Chaparral bush mallow
Malva parviflora[1]	Cheeseweed
Myrtaceae	**Myrtle Family**
Eucalyptus camaldulensis[1]	Red gum
Melaleuca nesophila[1]	Showy honey-myrtle
Onagraceae	**Evening Primrose Family**
Camissoniopsis cheiranthifolia	Beach suncup
Oxalidaceae	**Wood Sorrel Family**
Oxalis pes-caprae[1]	Bermuda buttercup
Polygonaceae	**Buckwheat Family**
Eriogonum fasciculatum	California buckwheat
Eriogonum parviflorum	Seacliff buckwheat
Rumex crispus[1]	Curly dock
Rosaceae	**Rose Family**
Heteromeles arbutifolia	Toyon
Scrophulariaceae	**Figworts Family**
Myoporum laetum[1]	Ngaio tree
Solanaceae	**Nightshade Family**
Lycium californicum[CRPR4.2]	California box-thorn
Gymnosperms	
Pinaceae	**Pine Family**
Pinus sp.	Pine tree
Monocots	
Arecaceae	**Palm Family**
Syagrus romanzoffiana[1]	Queen palm
Phoenix dactylifera[1]	Date palm
Washingtonia robusta[1]	Mexican fan palm
Agavaceae	**Agave Family**
Agave americana[1]	American century plant
Yucca sp.	Yucca
Juncaceae	**Juncus Family**
Juncus acutus [CRPR 4.2]	Southwestern spiny rush

Plant Species Observed

Scientific Name	Common Name
Poaceae	**Grass Family**
Arundo donax[1]	Giant reed
Bromus hordeaceus[1]	Soft brome
Cortaderia selloana[1]	Pampas grass
Cynodon dactylon[1]	Bermuda grass
Distichlis spicata	Saltgrass
Festuca myuros[1]	Rattail sixweeks grass
Polypogon monspeliensis[1]	Rabbit foot beard grass
Non-Vascular Species	
Ulvaceae	**Green Algae Family**
Chaetomorpha spiralis[1]	Spaghetti algae
Enteromorpha sp.	Hallow-green nori
Ulva lactuca	Sea lettuce
Rhodophyta	**Red Algae Family**
Gracilaria pacifica	Red seaweed
Plocamium cartilagineum	Red algae

Notes:

[1] = Non-native

[CRPR] = California Rare Plant Rank

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Wildlife Species Observed

Family	Common Name	Scientific Name
Birds		
Anseriformes (Waterfowl)		
Anatidae Ducks	Mallard	*Anas platyrhynchos*
Caprimulgiformes (Nightjars)		
Trochilidae Hummingbirds	Allen's hummingbird	*Selasphorus sasin*
	Anna's hummingbird	*Calypte anna*
Charadriiformes (Gulls, Terns, Plovers, and other Shorebirds)		
Laridae Gulls, Terns, and Skimmers	Caspian tern[1]	*Hydroprogne caspia*
	Forster's tern	*Sterna forsteri*
	Heermann's gull	*Larus heermanni*
	Royal tern	*Thalasseus maximus*
	Western gull	*Larus occidentalis*
Scolopacidae Sandpipers, Phalaropes, and Allies	Lesser yellowlegs	*Tringa flavipes*
	Long-billed curlew[1,2,3]	*Numenius americanus*
	Marbled godwit	*Limosa fedoa*
	Willet	*Tringa semipalmata*
Passeriformes (Perching Birds)		
Columbidae Doves and Pigeons	Eurasian collared-dove[4]	*Streptopelia decaocto*
	Rock pigeon[4]	*Columba livia*
Corvidae Jays, Magpies, and Crows	American crow	*Corvus brachyrhynchos*
	Common raven	*Corvus corax*
Fringillidae Finches	House finch	*Haemorhous mexicanus*
	Lesser goldfinch	*Spinus psaltria*
Hirundinidae Swallows	Barn swallow	*Hirundo rustica*
	Northern rough-winged swallow	*Stelgidopteryx serripennis*
Passerellidae New World Sparrows	House sparrow	*Passer domesticus*
	Belding's Savannah sparrow[3,5]	*Passerculus sandwichensis* spp. *beldingi*
	Song sparrow	*Melospiza melodia*
Tyrannidae Tyrant Flycatchers	Black phoebe	*Sayornis nigricans*
Pelicaniformes (Pelicans, Ibises, and Herons)		
Ardeidae Bitterns, Egrets, and Herons	California brown pelican[3,6]	*Pelecanus occidentalis californicus*
	Great egret	*Ardea alba*
	Snowy egret	*Egretta thula*

Wildlife Species Observed

Family	Common Name	Scientific Name
Suliformes (Cormorants)		
Phalacrocoracidae Cormorants	Brandt's cormorant	*Urile penicillatus*
	Double-crested cormorant[2]	*Phalacrocorax auritus*
Mammals		
Lagomorpha (Rabbits and Hares)		
Leporidae Rabbits and Hares	Desert cottontail	*Sylvilagus audubonii*
Rodentia (Rodents)		
Sciuridae Squirrels, Chipmunks, and Marmots	California ground squirrel	*Spermophilus beecheyi*
Carnivora (Carnivores)		
Otariidae Eared Seals	California sea lion[7]	*Zalophus californianus*
Fish		
Atheriniformes (Silversides)		
Atherinopsidae Silversides	Smelt	*Atherinopsis* sp.
Myliobatiformes (Batoids)		
Urotrygonidae Round Rays	California spotted stingray	*Urolophus halleri*
Invertebrates		
Cnidaria (Cnidarians)		
Actiniaria Sea Anemones and Corals	Sea anemone	*Anthozoa* sp.
Porpitidae Porpitids	By-the-wind sailors	*Velella velella*
Lepidoptera (Butterflies and Moths)		
Nymphalidae Brush-Footed Butterflies	Cloudless sulphur	*Phoebis sennae*
	Monarch[8]	*Danaus plexippus*
Pierinae Whites	Cabbage white	*Pieris rapae*
	Checkered white	*Pontia protodice*
Sphingidae Sphinx Moths	Sphinx moth	*Sphingidae* sp.

Notes:
1 Bird of Conservation Concern
2 California Department of Fish and Wildlife (CDFW) Watch List species
3 City of San Diego MSCP Covered Species
4 Non-native
5 State Endangered
6 CDFW Fully Protected
7 Marine Mammal Protection Act
8 FC= Federal Candidate for Listing