TETRA TECH EC, INC.

February 19, 2013

Eric Solorio, Project Manager
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Mitigation Analysis Report, Cogentrix Quail Brush Generation Project, City of San Diego, San Diego County, California, dated November 16, 2012

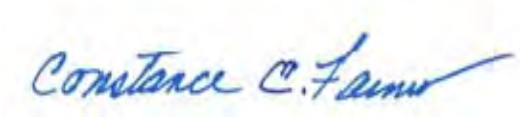
Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulations, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the biological resources Mitigation Analysis Report, Cogentrix Quail Brush Generation Project, City of San Diego, San Diego County, California (11-AFC-3), dated November 16, 2012. The Quail Brush Generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California. The following issue area is addressed in this submittal:

- Biological Resources

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980-3653.

Sincerely,



Constance E. Farmer
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix
John Collins, Cogentrix
Rick Neff, Cogentrix
Proof of Service List

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE QUAIL BRUSH GENERATION PROJECT

Docket No. **11**-AFC-03

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(Revised 02/12/2013)

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After docketing, the Docket Unit will provide a copy to the persons listed below. Do not send copies of documents to these persons unless specifically directed to do so.

KAREN DOUGLAS
Commissioner and Presiding Member

ANDREW McALLISTER
Commissioner and Associate Member

Raoul Renaud
Hearing Adviser

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Adviser to Commissioner Douglas

Jennifer Nelson
Adviser to Commissioner Douglas

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Patrick Saxton
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Eileen Allen
Commissioners' Technical
Adviser for Facility Siting

DECLARATION OF SERVICE

I, Constance Farmer, declare that on February 19, 2013, I served and filed copies of the attached Mitigation Analysis Report, Cogentrix Quail Brush Generation Project, City of San Diego, San Diego County, California, dated November 16, 2012. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: http://www.energy.ca.gov/sitingcases/quailbrush/index.html.

The document has been sent to the other persons on the Service List above in the following manner:

(*Check one*)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

_X_ I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; OR

___ Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: February 19, 2013

Constance C. Farmer

Mitigation Analysis Report
Cogentrix Quail Brush Generation Project
City of San Diego, San Diego County, California

La Mesa, California, USGS 7.5-minute Topographic Quadrangle Map
Township 15 South, Range 1 West, Section 7, Township 15 South, Range 2 West,
Section 12 and Unsectioned portions of El Cajon and Mission San Diego Land Grants

Prepared for:

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Contact: Ms. Connie Farmer, Senior Environmental Project Manager

Prepared by:

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Report Date: November 16, 2012

Table of Contents

List of Tables

List of Exhibits

SECTION 1: INTRODUCTION

The project applicant, Quail Brush Genco, LLC, has submitted an Application for Certification to the California Energy Commission (CEC) for approval of the proposed project. Thus, Quail Brush Genco, LLC is required to provide a thorough analysis of the proposed mitigation and a thorough demonstration of project consistency with the City of San Diego Subarea Plan of the MSCP. The Biological Resources Survey Report, previously submitted to the CEC for review, documents the existing conditions within the biological survey area and includes a technical analysis of potential project impacts to sensitive plant and wildlife species, native vegetation, or other sensitive biological resources, and provides recommendations to mitigate for significant project-related impacts.

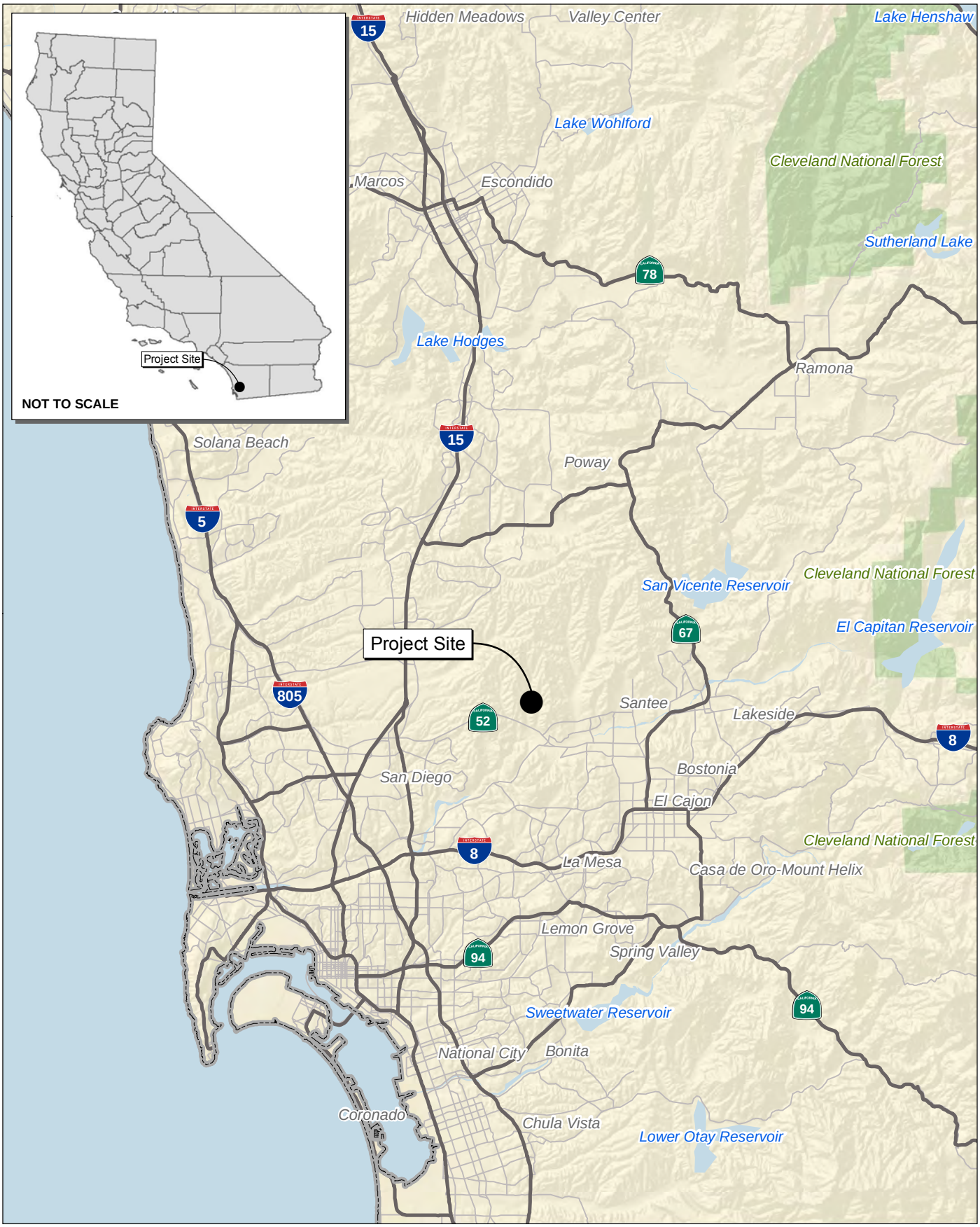
At the request of Tetra Tech EC, Inc., MBA prepared this stand-alone mitigation analysis for the Cogentrix Quail Brush Generation Project. The purpose of this document is to identify the proposed mitigation for the Cogentrix Quail Brush Generation Project and to analyze the proposed mitigation with respect to the existing project related impacts to determine if the proposed mitigation is of equal or greater value than the project related impacts as required by the City of San Diego guidelines for project related impacts within an existing Multiple Habitat Planning Area (MHPA).

The proposed project consists of a 100-megawatt gas-fired intermediate/peaking plant, hereafter referred to as power plant site or site, and associated facilities, located in the City of San Diego, San Diego County, California. The proposed project, including both permanent and temporary impacts includes a 20.33-acre power plant site, with 2.79 acres associated with the proposed gen tie, a 0.94-acre switchyard, and a 2,820 linear feet (2.62 acres) natural gas pipeline for a total impact of 26.79 acres.

1.1 - Project Site Location

The project site is generally located north of Interstate (I) 8, south of State Route (SR) 78, east of I - 15, and west of SR-67 in the City of San Diego, California (Exhibit 1). The project site is located within Township 15 South, Range 1 West, Section 7, Township 15 South, Range 2 West, Section 12, and unsectioned portions of El Cajon and Mission San Diego Land Grants, within the La Mesa, California, United States Geological Survey (USGS) 7.5-minute topographic quadrangle map (Exhibit 2). The project site is specifically located north of San Clemente Canyon Freeway (SR-52), east of Medina Drive, and east of Sycamore Landfill Road adjacent to the Sycamore Canyon Landfill (Exhibit 3).

The project site occurs within the boundaries of the City of San Diego Subarea Plan (Subarea Plan) of the MSCP, and the project site occurs within the MHPA. The proposed mitigation parcels also fall within the existing MHPA as well as an Environmentally Sensitive Area (ESA) (Exhibit 4). The MHPA continues to the south, east, and west of the project site, within undeveloped open space areas around the landfill. The ESA is specifically associated with the drainage feature within Spring Canyon.



Source: Census 2000 Data, The CaSIL, MBA GIS 2012.

Michael Brandman Associates

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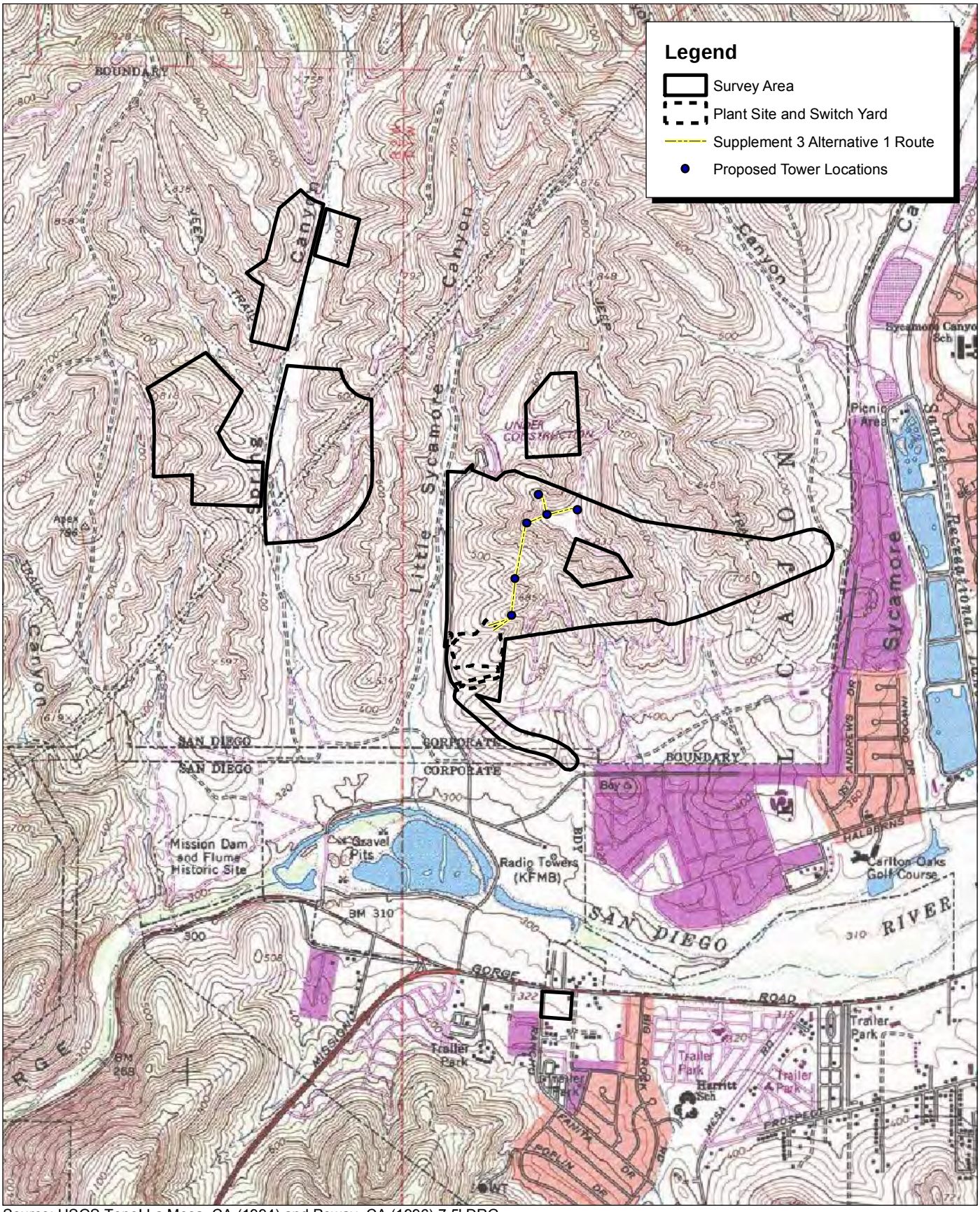
Exhibit 1
Regional Location Map



Source: USGS Topo! La Mesa, CA (1994) and Poway, CA (1996) 7.5' DRG.

Exhibit 2
Local Vicinity Map
Topographic Base

NORTH

2,000 1,000 0 2,000 Feet

Michael Brandman Associates

Source: ESRI Aerial Imagery, MBA Field Survey and GIS Data, 2012.

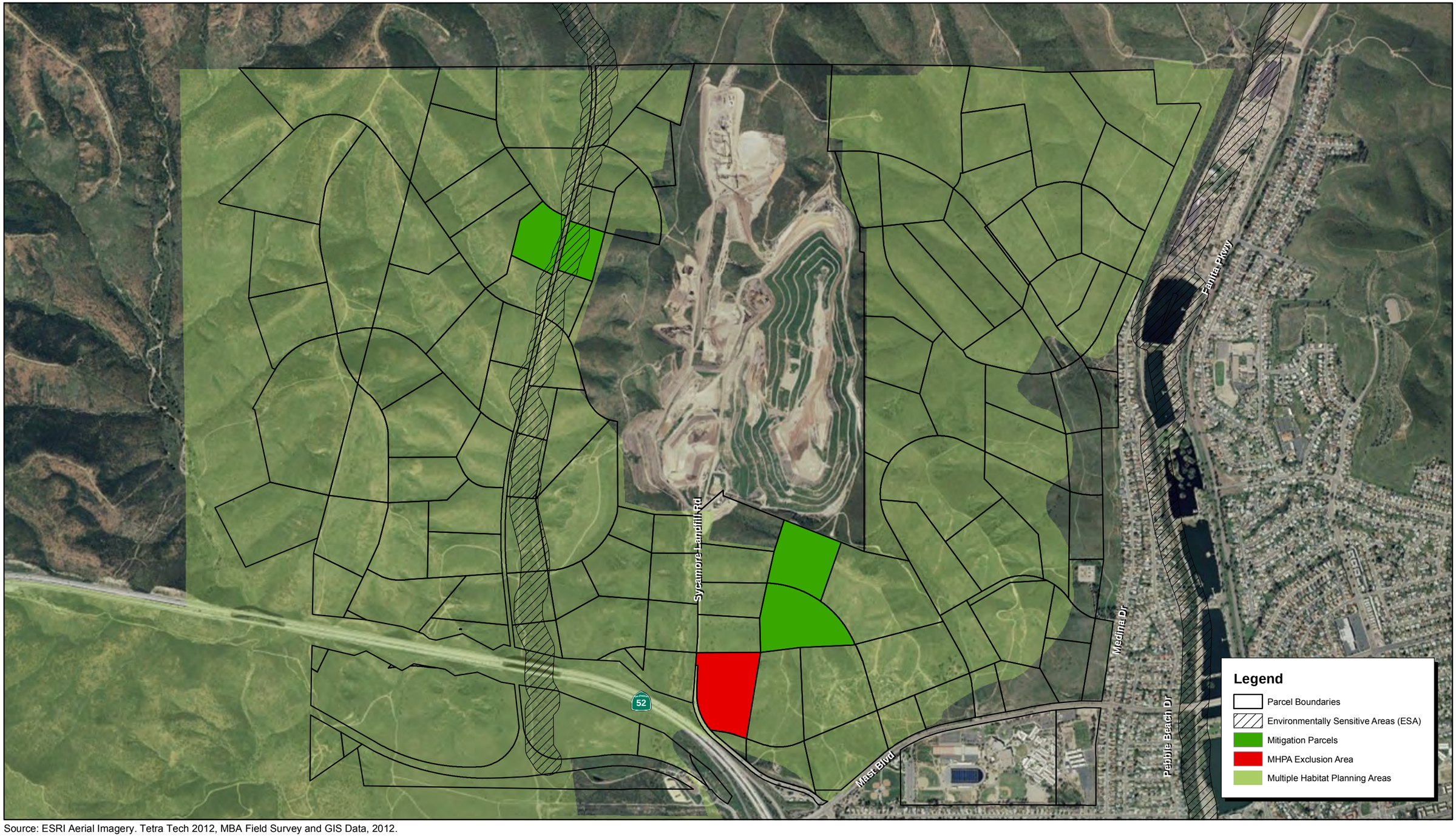
NORTH

2,000 1,000 0 2,000

Feet

Michael Brandman Associates

Exhibit 3
Local Vicinity Map
Aerial Base



Source: ESRI Aerial Imagery. Tetra Tech 2012, MBA Field Survey and GIS Data, 2012.

NORTH

1,300 650 0 1,300

Feet

Michael Brandman Associates

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Exhibit 4
MHPA Exclusion Area and Mitigation Parcels

1.2 - Project Description

The proposed project consists of 6 main project components, the construction, and operation of the following facilities:

- A 100-MW peaker plant.
- A 138 kV transmission line.
- Utility Switchyard.
- An 8-inch underground natural gas pipeline.
- Temporary Construction Laydown Area.
- Offsite Parking Area.

A preliminary project design was submitted as part of the original AFC. Following the first set of Data Requests received from the CEC, a subsequent project was designed to reduce the amount of biological resource impacts and utilize the existing SDG&E substation. This updated version of the project site is referred to as Supplement 2. More recently, a third version of the project site was designed to reduce even more biological resources and is referred to as Supplement 3. The Biological Resources Survey Report (MBA 2012) encompassed both the Supplement 2 and Supplement 3 project designs, which includes the footprints of all project facilities, associated buffer areas, and potential mitigation parcels. In order to better understand the effects of the preferred project site and subsequent mitigation requirements, a description of the preferred project design (Supplement 3 Alternative 1) is included below.

1.2.1 - Supplement 3 Alternative 1 Design

- A 100-MW peaker plant. Located 50-feet south of the AFC and Supplement 2 power plant site location.
- A 138 kV transmission line. Is a loop line that travels north to the southern portion of the Sycamore Land Fill, connects to the existing SDG&E line and travels back to the power plant site.
- A Switchyard. Located immediately northeast of the power plant site.
- An 8-inch underground natural gas pipeline. Travels from Mast Street to Sycamore Landfill Road to the power plant site.
- Temporary Construction Laydown Area. Located within the existing Sycamore Land Fill.
- Offsite Parking Area. Located south of the Mast Street.

The location of the proposed project was selected because of its close proximity to the existing landfill and existing electric transmission and natural gas lines. The proposed plant site will be located on a 21.7-acre privately owned parcel optioned by Development Land Holdings, LLC. The

parcel is located in an area currently zoned RS-1-8 (single-family residential use). Development Land Holdings and the project company Quail Brush Genco, LLC, are wholly owned subsidiaries of Cogentrix Energy, LLC and the project owner/operator.

SECTION 2: PROJECT RELATED IMPACTS

This section includes a discussion of the project related impacts that were determined to be potentially significant within the Biological Resources Survey Report and require mitigation under CEQA guidelines, which are discussed in detail in the Biological Resources Survey Report (MBA 2012).

Based on the Biological Resources Survey Report, the preferred project will have significant impacts with regard to direct impacts to upland habitats protected under the City of San Diego Subarea Plan of the San Diego County Multiple Species Conservation Plan, sensitive plant and wildlife species, and nesting migratory birds. In addition, significant impacts are also associated with project related impacts to the existing MHPA area. Indirect impacts associated with nitrogen deposition is also a potentially significant impact requiring mitigation.

2.1 - Direct Impacts

This section of the report provides a discussion of direct project-related impacts based on the preferred project design.

2.1.1 - Habitats/Vegetation Communities

The preferred project was designed to reduce the total project-related impacts and avoid sensitive biological resources to the extent feasible. The estimated project related impacts resulting from complete project installation with respect to vegetation communities is included in Table 1 below. The impacts are based on the Supplement 3 Alternative 1 project design. This table was included to identify the types of habitats that will be impacted, its percentage of the project site, and both temporary and permanent impacts associated with each plant community.

Table 1: Habitat Types/Vegetation Communities and Impacts (Based on Supplement 3 Alternative 1 Design)

Habitat/Vegetation Community	Existing Acres	Percent (%) of Survey Area	Permanent Impacts	Temporary Impacts
Diegan Coastal Sage Scrub	53.58	12.6	0.82	1.85
Diegan Coastal Sage Scrub/non-native grassland	52.81	12.4	0	0.03
Disturbed Habitat	25.83	6.1	0.35	0.12
Granitic Chamise Chaparral	38.27	9.0	0.00	0
Granitic Chamise Chaparral/non-native grassland	1.00	0.2	0.00	0
Native Grassland	0.99	0.2	0.06	0
Non-Native Grassland	232.77	54.7	10.82	11.44
Non-Vegetated Channel	2.96	0.7	0.00	0
Urban/Developed	17.33	4.1	0.00	1.30
Total	**425.54**	**100**	**12.05**	**14.74**

Table 2 below includes a breakdown of project related impacts based on each project component.

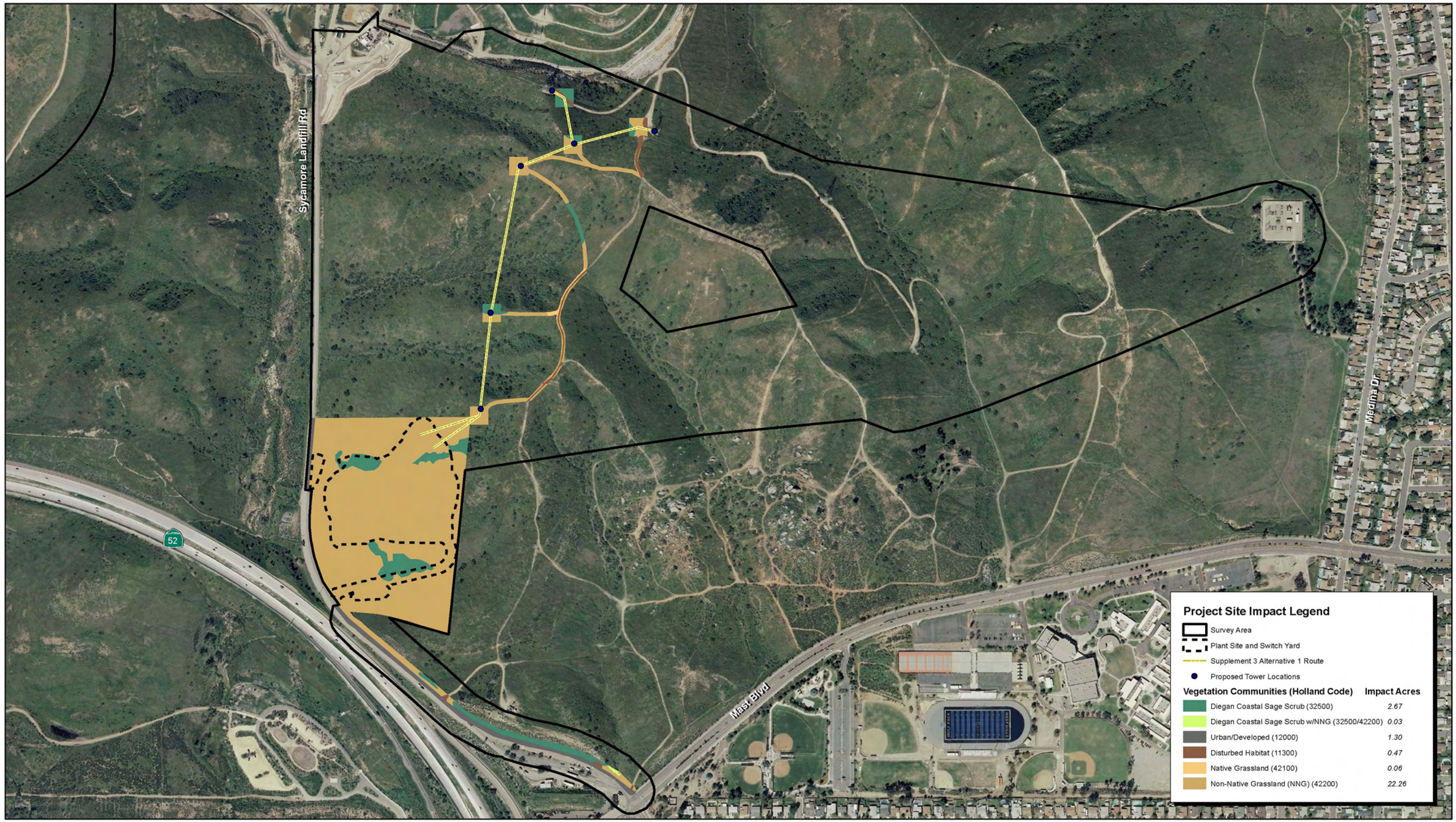
As Supplement 3, Alternative 1 is currently designed, the power plant site will permanently impact 9.5 acres of the 21.7-acre parcel, which includes 8.96 acres of non-native grasslands and 0.54 acre of Diegan coastal sage scrub (Table 2). The power plant site also includes temporary impacts to 0.83 acres of Diegan coastal sage scrub and 9.78 acres of non-native grassland. The remaining 1.30 acres within the parcel includes temporary impacts associated with the gas pipeline and is discussed below.

The gen tie portion of the project site will include up to 6 new towers and associated access roads, which includes 2.90 acres of total impacts (1.61 acres permanent and 1.29 acres temporary). Permanent impacts include 0.14 acre of Diegan coastal sage scrub, 0.35 acres of disturbed habitat, 0.06 acre of native grasslands, and 1.06 acres of non-native grasslands. Temporary impacts associated with the preferred gen tie include 0.40 acre of Diegan coastal sage scrub, 0.07 acre of disturbed habitat, and 0.82 acres of non-native grasslands

The natural gas pipeline installation will temporarily impact a total of 2.62 acres, which includes 0.62 acre of Diegan coastal sage scrub, 0.03 acres of Diegan coastal sage scrub/non-native grasslands, 1.13 acres of disturbed habitat, and 0.84 acres of non-native grasslands (Exhibit 5).

Table 2: Supplement 3 (Alternative 1) - Vegetation Community Impacts per Project Element (in Acres)

Impacts	Habitat/Vegetation Community	Diegan Coastal Sage Scrub	Diegan Coastal Sage Scrub/non-native grassland	Developed/ Disturbed Habitat	Native Grassland	Non-Native Grassland	Totals
Permanent	Power Plant (W/Access Road)	0.54	0	0	0	8.96	9.50
	Gen Tie	0.14	0	0.35	0.06	1.06	1.61
	Switchyard	0.14	0	0	0	0.80	0.94
	Natural Gas Pipeline	0	0	0	0	0	0
Sub Total		**0.82**	**0**	**0.35**	**0.06**	**10.82**	**12.05**
Temporary	Power Plant	0.83	0	0.22	0	9.78	10.83
	Gen Tie	0.40	0	0.07	0	0.82	1.29
	Switchyard	0	0	0	0	0	0
	Natural Gas Pipeline	0.62	0.03	1.13	0	0.84	2.62
Sub Total		**1.85**	**0.03**	**1.42**	**0**	**11.44**	**14.74**
Total		**2.67**	**0.03**	**1.77**	**0.06**	**22.26**	**26.79**



Source: ESRI Aerial Imagery. Tetra Tech 2012, MBA Field Survey and GIS Data, 2012.

NORTH

520 260 0 520

Feet

Michael Brandman Associates

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Exhibit 5
Vegetation Impacts
Supplement 3 (Alternative 1) - Project Design

Under the MSCP, mitigation requirements are determined based upon the level of impacts to certain Tier Habitat identified in the City Subarea Plan (Table 3). Native grassland is considered a Tier I habitat type, which is the highest ranking upland vegetation community. Diegan coastal sage scrub is considered a Tier II Habitat and is the second ranking upland vegetation community. Granitic chamise chaparral and non-native grasslands area considered Tier IIIA and IIIB respectively, which still require mitigation, but are the least valued vegetation communities. Project-related impacts that result in less than 0.10 acre of impacts to sensitive upland Tiers I, II, IIIA, and IIIB are not considered significant and do not require compensatory mitigation. Disturbed habitat and urban/developed land are considered Tier IV Habitats under the City Subarea Plan, which are the lowest value habitats in the Tier system and no compensatory mitigation is required for project-related impacts to a Tier IV Habitat. The Diegan sage scrub/non-native grassland ecotone areas are not acknowledged as separate vegetation communities under the City of San Diego Subarea Plan, however, for the purpose of proposed mitigation, these areas are treated the same as Diegan coastal sage scrub as a Tier II Habitat. Recommendation for project-related mitigation measures associated with impacts to native vegetation and habitat is discussed in Mitigation Measure BIO-1. The proposed mitigation ratios are consistent with the City of San Diego Municipal Code.

Table 3: Habitat Types/Vegetation Communities and Mitigation Acreage Calculations (Based on Supplement 3.1 Design)

Habitat/Vegetation Community	Permanent Impacts	Temporary Impacts	Total Impacts	Required Mitigation Ratio
Diegan Coastal Sage Scrub (Tier II)	0.82	1.85	2.67	1:1
Diegan Coastal Sage Scrub/non-native grassland (Tier II)	0	0.03	0.03	1:1
Disturbed Habitat (Tier IV)	0.35	0.12	0.47	0
Granitic Chamise Chaparral (Tier IIIA)	0	0	0	1:1
Granitic Chamise Chaparral/non-native grassland (Tier IIIA)	0	0	0	1:1
Native Grassland (Tier I)	0.06	0	0.06	2:1
Non-Native Grassland (Tier IIIA)	10.82	11.44	22.26	1:1
Non-Vegetated Channel (Tier I equivalent)	0	0	0	2:1
Urban/Developed (Tier VI)	0	1.3	1.3	0:1
Total	**12.05**	**14.74**	**26.79**	**—**

2.1.2 - Sensitive Plant Species

It was determined (MBA 2012) that that the proposed project has the potential to impact three special status plant species (San Diego barrel cactus (*Ferocactus viridescens*), San Diego goldstars (*Muilla clevelandii*), and variegated dudleya (*Dudleya variegata*).

San Diego Barrel Cactus

The power plant site is anticipated to directly impact approximately 39 San Diego barrel cactus. Project-related impacts to San Diego barrel cactus are considered a significant impact. Mitigation Measure BIO-2, provided below, will reduce potential project impacts to San Diego barrel cactus to less than significant.

Variegated Dudleya

The power plant site is not anticipated to directly impact any variegated dudleya. The proposed access road improvements associated with the gen tie right-of-way, is anticipated to potentially impact approximately 1 individual. Project-related impacts to variegated dudleya are considered a significant impact. Mitigation Measure BIO-2 provided below will reduce potential project impacts to variegated dudleya to less than significant.

San Diego Goldstars

The preferred project site is not anticipated to directly impact any San Diego goldstars. No additional mitigation measures are required for this plant under the preferred project design.

2.1.3 - Sensitive Wildlife Species

Based on the Biological Resources Survey Report (MBA 2012), the preferred project has the potential to impact five special-status wildlife species Quino checkerspot butterfly (*Euphydryas editha quino*), coastal California gnatcatcher (*Polioptila californica californica)*, Coronado Island skink (*Plestiodon skiltonianus interparietalis*), Cooper's hawk (*Accipiter cooperi*), southern rufous crowned sparrow (*Aimophila ruficeps canescens)*, and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*).

Quino Checkerspot Butterfly (QCB)

USFWS protocol surveys were conducted for this species during the 2012 Quino checkerspot butterfly flight season. The surveys were negative and Quino checkerspot butterfly (QBC) are considered absent from the survey area.

The project site is located within three miles of the Mission Trails population of QCB. This population was completely lost in the 2003 fire and remains absent from the area (USFWS personal communication, 2012). Based on the existing habitat characteristics within the biological survey area and the loss of the closest recorded population, it is highly unlikely that this species occurs on site or in the immediate vicinity. Based on the findings documented in the Sycamore Landfill Expansion Project EIR, Quino checkerspot butterfly is considered absent from the adjacent properties and has not been observed during previous surveys conducted within 3 miles of the project site in 1998, 2005, and 2010. Due to the history of negative surveys in the immediate vicinity, plus the negative surveys within the project site during the 2012 flight season, this species is not likely to occur within the project survey area.

Protocol surveys were conducted during the 2012 flight season. Although the 2012 flight season was less than optimal, with a below average annual rainfall, several known populations of Quino checkerspot butterfly were identified during the 2012 flight season and listed on the USFWS Quino checkerspot website. The sporadic rainfall allowed for an early flight season that extended over a longer period. The surveys conducted on the site were negative and no Quino checkerspot butterflies were observed during the survey. The project site is not located within any USFWS designated critical habitat. Therefore, there are no significant or potentially significant direct impacts associated with Quino checkerspot butterfly.

Coastal California Gnatcatcher

A single coastal California gnatcatcher was observed within the general survey area, just west of the SDG&E Carlson Substation. Based on the bird's behavior, it was determined that an area of approximately 5 acres, located just offsite to the southeast of the survey area, is utilized as the gnatcatcher pair's home range and that the pair periodically may forage outside of this area and onto the survey area (MBA 2012b), but are not likely to occur within the project site. Construction of the preferred project will avoid all occupied coastal California gnatcatcher habitat. The project site is not located within any USFWS designated critical habitat. The results of the coastal California gnatcatcher surveys are included in separate reports (MBA 2011b and 2012b). Therefore, the preferred project will have no direct impacts to coastal California gnatcatchers.

Coronado Island Skink

A single Coronado Island skink was observed foraging within dense non-native grasslands within the northern portion of the power plant site. This portion of the power plant site will be directly impacted by project development. Coronado Island skink is not a Covered Species under the City of San Diego Subarea Plan of the MSCP. Therefore, this species requires a separate analysis, independent of the MSCP to determine significance under the CEQA process. Impacts to this species are potentially significant if a large population of Coronado Island skink occurs within the project site and the loss of individuals within the project site will result in the decline of the population to a less than a self-sustaining level.

A population study has not conducted and therefore the total number of individuals within the project site was not determined. However, only one individual skink was observed, and based on the number of site visits conducted within the project site during the reconnaissance-level surveys as well as focused surveys for other sensitive plant and wildlife species, it was determined that a significant population of Coronado Island skink does not occur within the preferred project site. The loss of any individual Coronado Island skink as a result of project activities would not impact this species' self-sustaining population level. Impacts to this species is not considered significant. Furthermore, non-native grassland habitat will be preserved as part of the required mitigation for loss of the Tier III habitat based on City of San Diego requirements under the MSCP subarea plan. Mitigation Measure BIO-1 provided below will further reduce project impacts to Coronado Island skink. Mitigation

Measure BIO-3 will provide necessary monitoring to further reduce potential project related impacts during initial project grading activities.

Cooper's Hawk

This species was observed nesting in the southern willow-alder riparian woodland in the southwestern portion of the biological survey area, not on the project site. This area will not be directly impacted by project development. In addition, no suitable habitat for this species occurs within any of the proposed project related impact areas. Cooper's hawk is a Covered Species under the City of San Diego Subarea Plan of the MSCP. Therefore, this species is considered adequately conserved if conditions are implemented, as described in Appendix A, Species Evaluated For Coverage Under the MSCP, of the Subarea Plan. In addition, the Cooper's hawk is further protected under the MBTA and CFG Code during its appropriate nesting season, and further recommendation for protection is discussed in Mitigation Measure BIO-8.

Southern California Rufous Crowned Sparrow

This species was observed foraging in the Diegan coastal sage scrub/non-native grassland area along the western portion of the biological survey area, but is outside of the project site boundary. This portion of the survey area will not be directly impacted by project development. This species is currently absent from the project site. The project site does have marginal quality foraging habitat, but the loss of foraging habitat would not be considered a significant impact. Southern rufous crowned sparrow is a Covered Species under the City of San Diego Subarea Plan of the MSCP. Therefore, this species is considered adequately conserved if conditions are implemented, as described in Appendix A "Species Evaluated For Coverage Under the MSCP" of the Subarea Plan. In addition, the southern rufous crowned sparrow is further protected under the MBTA and CFG Code during its appropriate nesting season, and further recommendation for protection is discussed in Mitigation Measure BIO-8.

San Diego Black-tailed Jackrabbit

This species was observed within dense non-native grasslands and Diegan coastal sage scrub/non-native grassland habitat in the western portion of the biological survey area, within the valley floor of Spring Canyon. This species was not observed within the proposed project site and is not likely to be directly impacted by project related activities. San Diego black-tailed jackrabbit is not a Covered Species under the City of San Diego Subarea Plan of the MSCP. Therefore, this species requires a separate analysis to determine significance under the CEQA process. Project impacts to relatively flat grassland habitats are minimal and would not represent a substantial impact to the San Diego jackrabbits, since they were not observed in the project site portion of the survey area. Furthermore, grassland habitat would be preserved as mitigation for loss of this habitat as part of Mitigation Measure BIO-1. Therefore, there are no anticipated significant impacts to the San Diego jackrabbits.

2.1.4 - Nesting Birds

The Migratory Bird Treaty Act (MBTA) protects all native wild birds found in the United States. Resident game birds are managed separately by each state. The MBTA makes it unlawful for anyone to kill, capture, collect, possess, buy, sell, trade, ship, import, or export any migratory bird including feathers, parts, nests, or eggs, without a permit.

Section 3503 of the California Fish and Game Code (CFG Code) makes it illegal to destroy any birds' nest or any birds' eggs that are protected under the MBTA without a permit. Section 3503.5 further protects all birds in the orders Falconiformes and Strigiformes, birds of prey, such as hawks and owls, and their eggs and nests from any form of take.

The biological survey area and immediate vicinity supports suitable nesting and foraging habitat for a number of resident and migratory bird species, including raptors, protected under the MBTA and CFG Code. A list of a species observed within the project survey area is provided in Appendix B.

The coastal sage scrub surrounding the project site provides marginal nesting and foraging habitat for common resident species such as California towhee, wrentit, and spotted towhee (*Pipilo maculatus*). A few isolated trees line the existing unvegetated channel, which provides suitable nesting habitat for raptors such as Cooper's hawk and common yellowthroat (*Geothlypis trichas*). Potentially significant impacts associated with nesting migratory birds is adequately mitigated through Mitigation Measure BIO-8.

2.1.5 - City of San Diego MSCP Subarea Plan

The project site is within the City of San Diego Subarea Plan, which is part of the larger San Diego County Multiple Species Conservation Plan. The preferred project site is located within a City of San Diego MHPA as identified under the Subarea Plan (Exhibit 4).

The MHPA encompasses priority areas for conservation that provide suitable habitat, corridors, and linkages for sensitive flora and fauna species known to occur in the region. Portions of the MHPA that are public land, or private land with conservation easements are considered part of the "preserve." Because the power plant site parcel is private land with no conservation easements, the power plant site is not considered part of the "preserve" even though it is within the MHPA.

The parcel that the power plant site will be located on is currently within the boundary of the MHPA established by the City Subarea Plan. Because the plant will require development beyond the 25 percent development limit imposed for private land within the MHPA, a boundary line adjustment to the MHPA will be required to remove the parcel from the MHPA.

Section 5.4.2 of the MSCP Plan provides a process for adjustments to the boundaries of the MHPA, which includes an evaluation that includes six biological factors to evaluate biological value in a boundary change process. Adjustments to the MHPA boundaries may be made without the need to

amend the City Subarea Plan if the adjustment will result in the same or higher biological value of the MHPA. An assessment of the proposed project site impacts and proposed mitigation parcels was completed in the Biological Resources Survey Report, with the concurrence of the USFWS and CDFG.

Based on the City of San Diego Land Development Manual, all proposed development within an MHPA must be located on the least sensitive portions of the project site. The project site will be constructed within an area that is located between an existing landfill to the north and residential development and SR-52 to the south, thereby reducing potential impacts to high quality contiguous habitat located further to the northeast and northwest.

The project site does not contain any portion of an Environmentally Sensitive Area (ESA). The ESA is a specific environmentally sensitive area that provides habitat for sensitive plant and wildlife species and is typically associated with riparian habitats or drainage features. In this case, the drainage feature and associated riparian habitat associated with Spring Canyon is considered an ESA and is located along the western side of the biological survey area, but not within the preferred project site. Based on the current site design, the ESA will be completely avoided during project installation.

The majority of the proposed project is located within the existing MHPA. Portions of the proposed gas line occur outside of the MHPA boundary. A total of 24.85 acres of the project site occurs within the existing MHPA boundary, with 1.9 acres located outside of the boundary. It is assumed that in the future (more than 30 years), along with the adjacent Sycamore Landfill, the proposed project would be reclaimed as an open space preserve or passive park and included as part of the Mission Trails Park.

Due to the boundary line adjustment, the project site will no longer by part of the existing MHPA, therefore the Adjacency Management Guidelines discussed in Section 2.1.6 below are recommended to further reduce any potential indirect impacts to resources adjacent to the project site to less than significant.

2.1.6 - Urban Wildlands Interface/Adjacency Management Issues

An urban/wildlands interface is generally defined as land that presently contains, or will contain, as a result of a proposed action, both elements of an urban setting and raw undeveloped land or protected land. This land is situated as such to present a sharply defined physical contrast between the two, potentially creating an adverse edge effect resulting from direct and/or indirect impacts derived from the urban elements. An urban/wildlands interface may be most recognizable in larger multi-use developments that occur within or immediately adjacent to completely undeveloped and undisturbed land that provides habitat for plant and wildlife species in the area.

No design elements are proposed that would result in any significant indirect impacts to any adjacent land or any wildlife potentially using the project vicinity beyond that which already exists and

currently results from the existing development in the area (i.e., Sycamore Landfill and SR-52). The majority of the proposed project site is located within non-native grassland and existing disturbed and developed land, thereby reducing potential impacts resulting from any above ground physical hindrances beyond that which already exist, and minimizing potential indirect impacts from noise or lighting.

2.2 - Indirect Impacts

Indirect impacts are those impacts that are not directly associated with project construction activities, but likely occur to an area outside of the project footprint and after project construction is completed. The three indirect impacts potentially affecting the proposed project include nitrogen deposition, invasive plants and animals, and downstream water quality.

2.2.1 - Nitrogen Deposition

Nitrogen deposition is the input of nitrogen oxide (NO_X) and ammonia (NH_3) derived pollutants, primarily nitric acid (HNO_3), from the atmosphere to the biosphere. Mechanisms by which nitrogen deposition can lead to impacts on sensitive species include direct toxicity, changes in species composition among native plants, and enhancement of invasive species (Fenn et al. 2003; Weiss 2006). The increased dominance and growth of invasive annual grasses is especially prevalent in low-biomass vegetation communities that are naturally nitrogen-limited.

The project site is located within an area that already has a high level of nitrogen deposition (CEC map of Annual Nitrogen Decomposition). The majority of the vegetation currently within the project site is dominated by a dense stand of non-native grasslands. It is highly unlikely that any additional nitrogen within the project survey area will have any effect on the composition of the non-native grassland and since non-native grassland is not suitable habitat for any federal or state listed species, it is not considered a direct significant impact.

A single recorded occurrence of Quino checkerspot butterfly (2002) occurs 3 miles southwest of the project; no QCB has been recorded in the vicinity since then. This 2002 record is within the nitrogen deposition footprint based on the Nitrogen Deposition Analysis Results, but all habitat and evidence of Quino checkerspot butterfly were lost in the 2003 brush fire. Therefore, nitrogen deposition on previously occupied habitat will not significantly affect existing populations of Quino checkerspot butterfly, since the population has not been recorded to occur since 2002.

The nitrogen deposition will have a potentially significant impact on other federally or state list species that have been recorded to occur within the vicinity of the project site. Based on the current air-modeling, the proposed project will potentially impact approximately 806 acres of USFWS designated critical habitat for coastal California gnatcatcher. Since the baseline conditions surrounding the critical habitat areas is approximately 10.9 kg/he/yr; which is already over the estimated threshold of significance (5.0 kg/he/yr), the CEC has determined that the proposed project

will increase the nitrogen deposition and therefore any increase is considered a significant impact (Tonnesen 2012).

Therefore, the increase in nitrogen deposition levels contributed by the operation of the project may increase the amount of non-native grassland species and therefore reduce the habitat quality to a level no longer suitable for coastal California gnatcatcher. Potentially significant impacts associated with nitrogen deposition is adequately mitigated through Mitigation Measure BIO-11.

2.2.2 - Invasive Plants and Wildlife

The introduction of non-native invasive plant and wildlife species can be a potentially significant indirect impact. Invasive species can often be spread from project site to project site. Although the majority of the survey area is comprised of low to moderate quality coastal sage scrub and dense non-native grasslands, there are a few patches of native grasslands. An increase in non-native weedy species may indirectly affect native grasslands, which is considered a sensitive plant community within the City of San Diego. Introduction of invasive weedy species during project construction could be a significant impact. Potentially significant impacts associated with invasive plants is adequately mitigated through Mitigation Measure BIO-5 and Mitigation Measure BIO-11.

Invasive wildlife species are commonly associated with the introduction of residential development. Unwanted feral cats and exotic wildlife species, such as red-eared sliders, boa constrictors, and iguanas, are often released in the wild and can have potentially significant impacts on the existing native plant and wildlife species. However, due to the nature of the proposed development, it is highly unlikely that the development of a peaker plant will have any increase in invasive wildlife species, and therefore should not be considered a significant impact.

2.2.3 - Downstream Water Quality

Although the project site does not contain drainage features under the jurisdiction of the USACE, CDFG, and Regional Water Quality Control Board, there is a potential for indirect impacts to downstream waters. The watershed flows to the San Diego River, which is a regulated water body. The proposed project will likely require a Storm Water Pollution Prevention Plan (SWPPP). With the implementation of best management practices associated with the SWPPP, it is unlikely that the downstream water quality will be affected following the installation of the proposed project.

2.2.4 - Noise Impacts

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. Loud, reoccurring noise can often directly or indirectly affect wildlife species.

Since there are no federally or threatened species within the project site, noise impacts are not considered a direct impact. However, based on USFWS acceptable noise impact thresholds, a noise

impact of an average level of 60 decibels (dB)/hour is considered a potentially significant indirect impact. The 60 decibel contour extends approximately 500 feet to the east of the project site.

Based on the noise study completed for the project, the majority of the noise impacts are directed toward the east of the plant site. There are no recorded threatened of endangered species within the 60 dB sound level contour. Therefore, noise impacts from the proposed project will not have a significant impact on federally or state threatened or endangered species, which includes the coastal California gnatcatcher and least Bell's vireo.

Under the CEQA guidelines, wildlife species of concern must also be analyzed for potentially significant indirect impacts associated with noise impacts. Due to the minimal footprint of significant noise impacts surrounding the project site (500 feet), the extent of available habitat surrounding the project site, and the few number of species of concern within the project footprint, noise impact are less than significant.

2.3 - Cumulative Impacts

Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Proposed development in the area, which may contribute to the cumulative affect of the project includes the expansion of the existing landfill and the adjacent residential development project southeast of the survey area. Cumulatively, the affect these projects have on natural resources is minimal. Each individual project will be mitigated separately for potentially significant impacts and each project has a unique set of specific natural resource issues.

The proposed project site and adjacent projects, are not located within a wildlife movement corridor.

The three different types of projects minimizing the cumulative affect by reducing habitat for different types of species. For instance, the residential development will reduce the number of small rodents, sensitive bird species and much higher quality coastal sage scrub. The adjacent landfill expansion will impact marginal quality habitat, but still provides habitat for a number of opportunistic species such as coyote, raccoon, and opossums. The peaker plant project will remove low-quality grassland habitat, but will put into conservation some of the best habitat surrounding the project site.

The proposed project in combination with the other foreseeable projects, will likely cause an increase in the overall nitrogen deposition levels that are already above significant levels. Implementation of Mitigation Measure BIO-7 will reduce the cumulative impacts to those less than significant.

SECTION 3: PROPOSED MITIGATION MEASURES

Mitigation measures were briefly described in the Biological Resources Survey Report. The impact calculations mentioned above in Section 2, are based on the most current project related impacts and are based on the Supplement 3 - Alternative 1 project design. The following is a list of necessary mitigation measures that will reduce potential project-related impacts to biological resources to less than significant levels.

3.1 - Loss of Vegetation Communities and Wildlife Habitat

The following will reduce potential project-related impacts to upland plant communities known to occur on the project site to less than significant.

MM BIO-1 Based on the City of San Diego Municipal Code, Table 3: Upland Mitigation Ratios, the City has adopted a pre-determined mitigation ratio for project related impacts to plant communities determined to be of conservation value. The following mitigation ratios will be used to calculate the minimum habitat compensation for impacts associated with the proposed project. Tier I habitats will be mitigated at a 2:1 ratio, Tier II, IIIa, and IIIb habitats will be mitigated at a 1:1 ratio. Impacts to Tier IV habitats require no mitigation compensation. Therefore, project-related impacts to 0.06 acre of native grasslands would normally be mitigated by the preservation or creation of 0.12 acre of native grasslands.

However, based on the MSHP requirements, impacts to areas less than 0.1 acre do not require mitigation because they are too small to be considered a significant impact. Impacts to 2.70 acres of Diegan sage scrub and Diegan sage scrub/non-native grassland (rounded to the nearest hundredth of an acre) will be mitigated by the preservation or creation of 2.70 acres of Diegan sage scrub. Impacts to 22.26 acres of non-native grasslands will be mitigated by the creation or restoration of 22.26 acres. Impacts to 0.06 acre of native grasslands will be mitigated by the creation or restoration of 0.12 acre of native grasslands. Total mitigation for project related impacts to plant communities is 25.08 acres to offset potentially significant impacts to natural plant communities (Table 4). This mitigation is calculated based on the Upland Tier System of the MSCP and does not reflect impacts associated with a MHPA boundary line adjustment. That is further discussed below.

All temporary impacts will be restored with native vegetation as appropriate within the proposed project development such as disturbed graded slopes and temporary work areas. Revegetation of temporary impact areas may be considered as part of the overall mitigation if a restoration plan is prepared to ensure proper restoration and restoration efforts meet design requirements as approved by the City of San Diego.

Table 4: Habitat Types/Vegetation Communities and Mitigation Acreage Calculations (Based on Supplement 3.1 Design)

Habitat/Vegetation Community	Permanent Impacts	Temporary Impacts	Total Impacts	Mitigation Ratio	Mitigation Acreage
Diegan Coastal Sage Scrub	0.82	1.85	2.67	1:1	2.67
Diegan Coastal Sage Scrub/non-native grassland	0	0.03	0.03	1:1	0.03*
Disturbed Habitat	0.35	0.12	0.47	0	0
Granitic Chamise Chaparral	0	0	0	1:1	0
Granitic Chamise Chaparral/non-native grassland	0	0	0	1:1	0
Native Grassland	0.06	0	0.06	2:1	0.12*
Non-Native Grassland	10.82	11.44	22.26	1:1	22.26
Non-Vegetated Channel	0	0	0	2:1	0
Urban/Developed	0	1.3	1.3	0:1	0
Total	**12.05**	**14.74**	**26.79**	**—**	**25.08**

* Mitigation is not required because impacts are less than 0.10 acre.

Several potential mitigation parcels were included in the Biological Resources Survey Report in order to determine the biological value of potential mitigation parcels. The mitigation parcels selected for conservation must be of higher biological resource value than the project site. Based on the findings in the Biological Resource Survey Report (MBA 2012), all mitigation parcels surveyed have a higher biological resource value than the proposed project site.

Table 5 below provides a detailed look at the existing vegetation communities within each parcel. These data, along with consultation with USFWS, CDFG, and CEC biologist was used to determine the most appropriate mitigation parcels.

Table 5: Vegetation Communities within Potential Mitigation Parcels

Habitat/Vegetation Community	36603031	36603112	36608027	36608028	Totals
Diegan Coastal Sage Scrub	0	2.16	5.49	7.62	15.27
Diegan Coastal Sage Scrub/ non-native grassland	5.21	4.44	0	1.96	11.61
Disturbed Habitat	0	0.24	0.49	0.45	1.18
Granitic Chamise Chaparral	4.14	1.07	0	0	5.21

Table 5 (cont):Vegetation Communities within Potential Mitigation Parcels

Habitat/Vegetation Community	36603031	36603112	36608027	36608028	Totals
Native Grassland	0.61	0	0	0.37	0.98
Non-native Grassland	1.47	0.02	10.75	10.21	22.45
Non-Vegetated Channel	0.03	0.56	0	0	0.59
Total	**11.46**	**8.49**	**16.73**	**20.61**	**57.29**

The following four parcels will be used for mitigation to offset the impacts associated with the proposed project: 36603035, 36603112, 36608027 and 36608028. Based on the existing impacts to the proposed project site, 0.8 percent of the impacts are to Tier I habitats, 6.1 percent of the impacts are to Tier II habitats, and 93.1 percent are to Tier III habitats. Table 6 below indicates the proposed conservation acreage of each habitat with respect to the mitigation parcels and is shown in Exhibit 6.

Table 6: Vegetation Communities Acreage for Mitigation

Project Site/Mitigation Parcels	Diegan Coastal Sage Scrub (Tier II)	Diegan Coastal Sage Scrub/Non-native Grassland (Tier II)	Granitic Chamise Chaparral (Tier IIIa)	Native Grassland (Tier I)	Non-native Grassland (Tier IIIb)	Non-Vegetated Channel (2:1)
Project Site Mitigation Requirements*	**3.28**	**0**	**0**	**0.24***	**43.28**	**0**
36603031	0	5.21	4.14	0.61	1.47	0.03
36603112	2.16	4.44	1.07	0	0.02	0.56
36608027	5.49	0	0	0.0	10.75	0
36608028	7.62	1.96	0	0.37	10.21	0
Total Mitigation Parcels	**15.27**	**11.61**	**5.21**	**0.98**	**22.45**	**0.59**
* (Based on 4;1 Mitigation Ratio)						

Source: ESRI Aerial Imagery. Tetra Tech 2012, MBA Field Survey and GIS Data, 2012.

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Exhibit 6
Mitigation Vegetation Communities

Parcel 36603031 is located in the northwestern corner of the survey area and is characterized by gently rolling hills with sparse granitic chamise chaparral, Diegan coastal sage scrub/non-native grassland, non-native grassland, and non-vegetated channel. Table 7 below indicates the percentage of each habitat with respect to the City of San Diego Tier system of mitigation compared to the project related permanent impacts.

Table 7: Mitigation Parcel Percentage of Tier System

Project Site/Mitigation Parcels	Diegan Coastal Sage Scrub (Tier II)	Diegan Coastal Sage Scrub/Non-native grassland (Tier II)	Granitic Chamise Chaparral (Tier IIIa)	Native Grassland (Tier I)	Non-native Grassland (Tier IIIb)	Non-Vegetated Channel (2:1)
Project Site Mitigation Minimum Requirements	**6.1 %**	**0**	**0**	**0.8 %**	**93.1 %**	**0**
36603031	0	44.4 %	35.3 %	5.2 %	12.6 %	2.5 %
36603112	26.2 %	53.8%	13.0 %	0	2.4 %	6.8%
36608027	33.8 %	0	0	0	66.2 %	0
36608028	37.8 %	9.7 %	0	1.9 %	50.7 %	0

The following information is specifically related associated with the MSCP Biological Evaluation Factors:

1. The conservation of 11.46 acres secures high quality conservation habitat within the northwestern portion of the MHPA. This parcel is immediately east of a parcel already conveyed to the City of San Diego for Conservation. Based on the existing conditions within this parcel, 5.2 percent of the mitigation parcel is a Tier 1 habitat, 44.4 percent of the mitigation parcel is a Tier II habitat, 48.9 percent of the mitigation parcel is a Tier III habitat, and the remaining 2.5 percent contains non-vegetated channel, which is not part of the Upland Tier System, but is part of the wetland system, which typically requires a 2:1 mitigation ratio, which is equivalent to a Tier I habitat. The overall habitat quality is significantly higher than the proposed project site.
2. The exchange for this specific parcel would increase the conservation value of covered species. This parcel provides higher quality habitat for several of the covered species, although none were observed within the parcel during survey work.
3. This parcel provides conservation for a potential wildlife corridor associated with Spring Canyon. A small tributary of Spring Canyon occurs along the northern boundary of this parcel. The conservation of this land will preserve a portion of the western edge of Spring Canyon.

4. This mitigation parcel is located in relatively undisturbed natural canyon area to the west of the proposed project site. This area is in the vicinity of land already conveyed to the City of San Diego. The conservation of this parcel will provide the protection of a large patch of native grassland (Exhibit 7).

5. The parcel contains a mix of chamise chaparral, coastal sage scrub/non-native grassland mix, and non-native grasslands along with assorted ecotones between the communities. This provides a much more diverse habitat than the habitat within the project site. The percentage of non-native weedy species within the project site is approximately 93 percent, but drops to 12.6 percent within this parcel. It also has a well balanced mix of habitats, which the project site lacks.

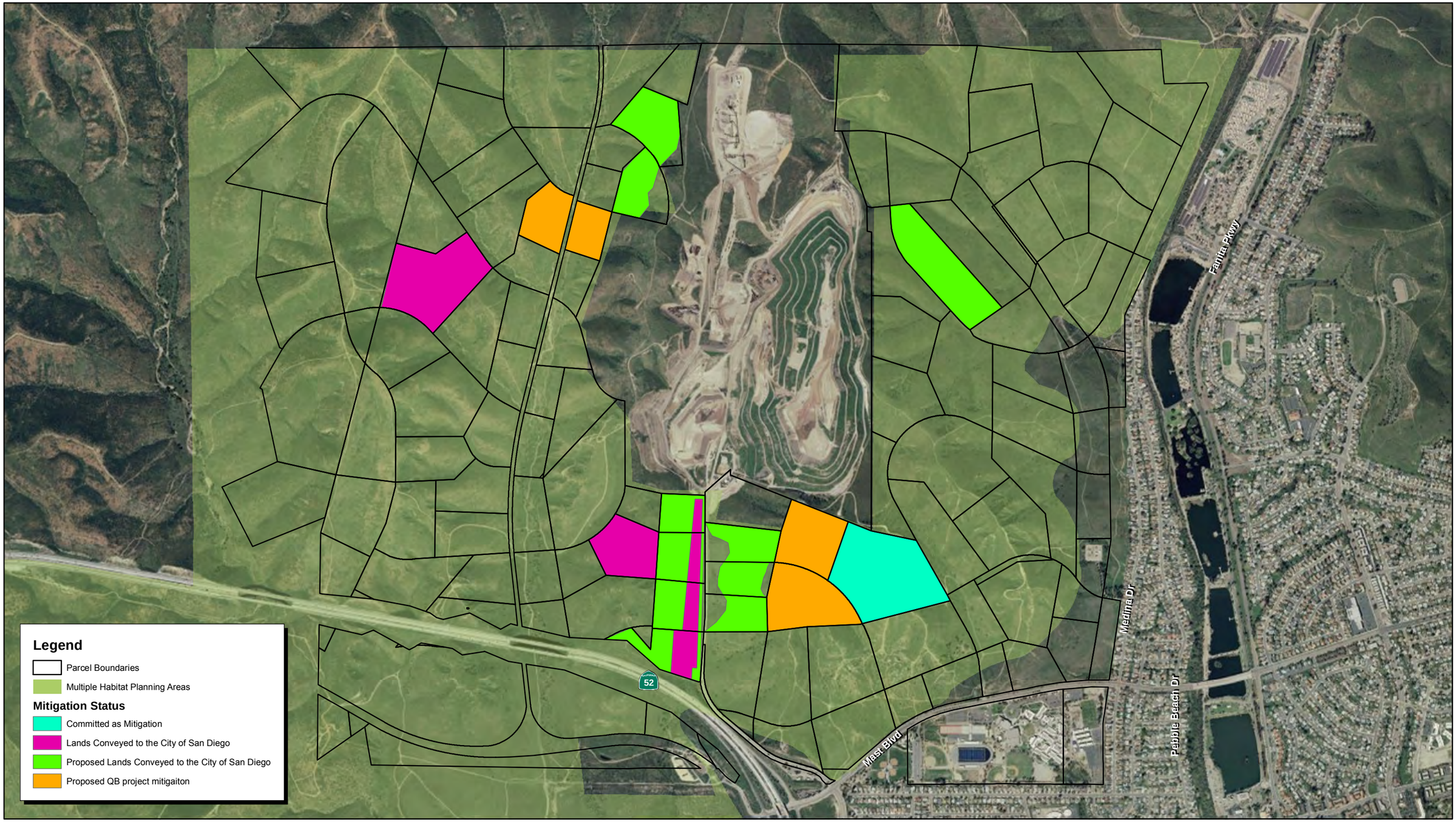
6. The exchange for this specific parcel would increase the conservation of species of concern not on the covered species list. This parcel contains higher quality habitat than the project site and is located in a relatively undisturbed area. The exchange will not significantly increase the likelihood that an uncovered species will meet the criteria for listing under the federal or state Endangered Species Act.

Parcel 36603112 is located in the northwestern corner of the survey area and is characterized by gently rolling hills with sparse granitic chamise chaparral, Diegan coastal sage scrub, Diegan coastal sage scrub/non-native grassland, non-native grassland, and non-vegetated channel. The following information is specifically related MSCP Biological Evaluation Factors:

1. The conservation of 8.25 acres secures high quality conservation habitat within the northwestern portion of the MHPA. This parcel is immediately west of a parcel that is proposed to be conveyed to the City of San Diego for conservation as part of the mitigation for the Sycamore Landfill Expansion Project. Based on the existing conditions within this parcel, 80 percent of the mitigation parcel is a Tier II habitat, and 13.2 percent is a Tier III habitat. In addition, 5.6 percent of the mitigation parcel contains non-vegetated channel. The overall habitat quality is significantly higher than the proposed project site.

2. The exchange for this specific parcel would increase the conservation value of covered species. This parcel provides higher quality habitat for several of the covered species, including willowy monardella and San Diego barrel cactus.

3. This parcel provides conservation for a potential wildlife corridor associated with Spring Canyon. The conservation of this land will preserve a portion of the eastern edge of Spring Canyon.



Source: ESRI Aerial Imagery. Tetra Tech 2012, MBA Field Survey and GIS Data, 2012.

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Exhibit 7
Existing and Proposed Conservation

4. This mitigation parcel is located in relatively undisturbed natural canyon area to the west of the proposed project site. This area is in the vicinity of land already conveyed to the City of San Diego and immediately adjacent to areas that are proposed to be conveyed to the City. This parcel is located immediately east of Parcel 36603031, mentioned above, and provides a connection between the proposed land that will be conveyed to the City of San Diego and the existing land that has already been conveyed to the City of San Diego for conservation.

5. The parcel contains a mix of chamise chaparral, coastal sage scrub, coastal sage scrub/non-native grassland mix, non-native grassland, and unvegetated channel along with assorted ecotones between the communities. This provides a much more diverse habitat than the habitat within the project site. The percentage of non-native weedy species within the project site is approximately 93 percent, but drops to 0.2 percent within this parcel. It also has a well balanced mix of habitats, which the project site lacks.

6. The exchange for this specific parcel would increase the conservation of species of concern not on the covered species list. This parcel contains higher quality habitat than the project site and is located in a relatively undisturbed area. The exchange will not significantly increase the likelihood that an uncovered species will meet the criteria for listing under the federal or state Endangered Species Act.

Parcel 36608027 is located in the southern portion of the survey area and is characterized by gently rolling hills with sparse Diegan coastal sage scrub, disturbed habitat, and non-native grasslands. The following information is specifically related MSCP Biological Evaluation Factors:

1. The conservation of 16.73 acres secures high quality conservation habitat within the southern portion of the MHPA. This parcel is immediately west of a parcel that is currently part of the conservation effort for the Sycamore Landfill Expansion Project. Based on the existing conditions within this parcel, 33.8 percent is a Tier II habitat and 66.2 percent is a Tier III habitat. The overall habitat quality is higher than the proposed project site.

2. The exchange for this specific parcel would increase the conservation value of covered species. This parcel provides higher quality habitat for several of the covered species, including San Diego barrel cactus.

3. This parcel provides higher functionality of the existing conservation area already established for mitigation requirements for the Sycamore Land Fill. The conservation of this land will expand the currently existing conservation area and provide a buffer between the proposed project and the conservation area.

4. This mitigation parcel is located in relatively undisturbed natural area to the east of the proposed project site. This parcel is located immediately west of land already in conservation, which would make maintaining the conservation areas more efficient. One of the main goals of the USFWS, CDFG, and CEC was to expand existing conservation areas or

attempt to place conservation area close together in order to conserve a much larger habitat area. That requirement is achieved with this parcel.

5. The parcel contains a mix of Diegan coastal sage scrub and non-native grassland along with an ecotone between the communities. This provides a much more diverse habitat than the habitat within the project site. The percentage of non-native weedy species within the project site is approximately 93 percent, but drops to 66.2 percent within this parcel. It also has a well balanced mix of habitats, which the project site lacks.

6. The exchange for this specific parcel would increase the conservation of species of concern not on the covered species list. This parcel contains higher quality habitat than the project site and is located in a relatively undisturbed area. The exchange will not significantly increase the likelihood that an uncovered species will meet the criteria for listing under the federal or state Endangered Species Act.

Parcel 36608028 is located in the southern portion of the survey area and is characterized by gently rolling hills with sparse Diegan coastal sage scrub, Diegan coastal sage scrub/non-native grassland, native grassland, and non-native grassland. The following information is specifically related MSCP Biological Evaluation Factors:

1. The conservation of 10.80 acres secures high quality conservation habitat within the southern portion of the MHPA. This parcel is immediately west of a parcel that is currently part of the conservation effort for the Sycamore Landfill Expansion Project. Based on the existing conditions within this parcel, 1.9 percent of the mitigation parcel is a Tier I habitat, 47.5 percent is a Tier II habitat, and 50.7 percent is a Tier III habitat. The overall habitat quality is significantly higher than the proposed project site.

2. The exchange for this specific parcel would increase the conservation value of covered species. This parcel provides higher quality habitat for several of the covered species, including San Diego barrel cactus.

3. This parcel provides higher functionality of the existing conservation area already established for mitigation requirements for the Sycamore Land Fill. The conservation of this land will expand the currently existing conservation area and provide a buffer between the proposed project and the conservation area.

4. This mitigation parcel is located in relatively undisturbed natural area to the east of the proposed project site. This area is in the vicinity of land already in conservation. This parcel is located immediately west of land already in conservation, which would make maintaining the conservation areas more efficient. One of the main goals of the USFWS, CDFG, and CEC was to expand existing conservation areas or attempt to place conservation area close together in order to conserve a much larger habitat area. That requirement is achieved with this parcel.

5. The parcel contains a mix of Diegan coastal sage scrub, Diegan coastal sage scrub/non-native grassland mix, native grassland, and non-native grassland along with assorted ecotones between the communities. This provides a much more diverse habitat than the habitat within the project site. The percentage of non-native weedy species within the project site is approximately 93 percent, but drops to 50.7 percent within this parcel. It also has a well balanced mix of habitats, which the project site lacks.

6. The exchange for this specific parcel would increase the conservation of species of concern not on the covered species list. This parcel contains higher quality habitat than the project site and is located in a relatively undisturbed area. The exchange will not significantly increase the likelihood that an uncovered species will meet the criteria for listing under the federal or state Endangered Species Act.

Based on the information above, the proposed project contains a total of 12.05 acres of permanent impacts. USFWS, CDFG, and CEC have required a 4:1 mitigation ratio for impacts associated with the proposed project to be conserved within the MHPA boundary. Based on the information requested by the resource agencies, approximately 48.20 acres of land should be put into conservation. The 4 parcels selected for mitigation total 57.29 acres, which will satisfy the 4:1 mitigation ratio. However, the 4:1 mitigation does not take into consideration the habitat types. For instance, the permanent impact of 6.66 acres of non-native grassland typically would require 26.64 acres of equivalent mitigation lands. However, due to the City of San Diego's goal to have mitigation lands of higher value than the proposed project site, the mitigation acreages moved from a higher percentage of low-quality non-native vegetation to a higher percentage of native vegetation. Table 7 above provides a detailed account of the percentages of Tiered Habitat for each parcel. In all 4 proposed mitigation parcels, there is a significant shift from low-quality non-native grassland to higher quality Diegan coastal sage scrub and granitic chamise chaparral. Thus, the City of San Diego's requirements under the MSCP are met.

Table 8 below provides a detailed account of the existing vegetation communities within the City of San Diego MHPA. Existing data used to calculate the vegetation communities acreage within the MHPA is based on the County of San Diego SANGIS database. The table also includes the total proposed encroachment, the proposed addition, and the net change of acreage within the MHPA Boundary. Since the proposed mitigation will be included within the MHPA Boundary, the Proposed Additional acreage will be set aside as conservation lands within the MHPA boundary.

Table 8: MHPA Exchange

Habitat / Vegetation Community	Tiers	Existing MHPA Acres*	Proposed Encroachment	Proposed Addition	Net Change
Diegan Coastal Sage Scrub	Tier II	1,186.90	1.53	15.27	+13.74
Diegan Coastal Sage Scrub/non-native grassland	Tier II	0	0	11.61	+11.58
Disturbed Habitat	Tier IV	0.51	0	1.18	+0.71
Granitic Chamise Chaparral	Tier III	512.52	0	5.21	+5.21
Coastal Sage Scrub/Chaparral	Tier II	2.08	0	0	0
Native Grassland	Tier I	0	0	0.98	+0.92
Non-Native Grassland	Tier III	347.24	19.77	22.45	+2.68
Non-Vegetated Channel	Tier I equivalent	22.58	0	0.59	+0.59
Riparian Woodlands	Tier I equivalent	1.55	0	0	0
Southern Coast Live Oak Riparian Forest	Tier I equivalent	6.52	0	0	0
Southern Mixed Chaparral	Tier III	0.46	0	0	0
Southern Riparian Scrub	Tier I equivalent	0.17	0	0	0
Southern Sycamore-alder Riparian Woodland	Tier I equivalent	16.64	0	0	0
Urban/Developed	Tier IV	0.92	0.22	0	-0.22
Totals		**2,098.09**	**21.52**	**57.29**	**+35.21**

Notes:
*Based on San Diego County Vegetation Map.

3.1.1 - Sensitive Plant Species

The following will reduce potential project-related impacts to the 3 special-status plant species known to occur on the project site to less than significant.

MM BIO-2 The project has been designed to avoid sensitive plant species to the extent possible by locating the project on lower quality habitat. However, the installation of the power plant site will still potentially impact approximately 39 individual barrel cactus and a single variegated dudleya. Prior to initial soil disturbance, the project site will be surveyed for special-status plant species by a qualified botanist, approved by the CEC Compliance Project Manager, prior to pre-construction site mobilization. The power plant site, transmission line towers, and access roads containing suitable habitat shall be surveyed during the appropriate blooming period for San Diego barrel cactus and variegated dudleya, which are known to occur within the project

site. Surveys shall be consistent with CDFG Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009).

1. If special-status plant species are detected, they shall be avoided during construction activities if feasible and the CEC Compliance Project Manager shall be contacted.
2. If special-status plants are detected during the survey, a letter report of findings shall be prepared and will include a map or aerial photo identifying the location of each individual plant.
3. Any special-status plant species detected will be documented and the data will be submitted to the California Natural Diversity Database (CNDDB) within 30 days of completion of surveys. CNDDB data will be submitted following the current instructions on the CDFG website.
4. If special-status plant species are detected that cannot be avoided, the project owner will utilize a Sensitive Plant Relocation Plan, similar to the existing plan currently approved for the adjacent Sycamore Landfill. The sensitive plants will be relocated to an approved relocation site or to a proposed mitigation parcel or other suitable habitat area as deemed appropriate by the CEC Compliance Project Manager. This will result in a no net-loss of sensitive plant species.
5. Although 39-barrel cacti were observed within the project footprint during previous surveys, the applicant may be able to avoid some of the barrel cactus during construction activities. Therefore, mitigation requirements for project related impacts to barrel cactus should be evaluated throughout the pre-construction activities. Once the barrel cactus individuals have been mapped and quantified, they will be relocated to any one of the four proposed mitigation parcels that has similar habitat components including slope, aspect, soils, and other environmental conditions necessary to replicate existing conditions.

Verification: No less than 30 days prior to the start of any pre-construction site mobilization, the project owner shall provide the CEC Compliance Project Manager a letter-report describing the findings of the pre-construction special-status plant surveys following the Botanical Survey Report Guidelines in the CDFG Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009), including the dates, identity and qualifications of the surveyor(s); discussion of timing of surveys, and a list of all species observed. Raw GPS data, metadata, and CNDDB field forms shall be submitted to the CEC Compliance Project Manager within two weeks of the completion of the survey. The results for the botanical surveys shall also be submitted to the CEC Compliance Project Manager within two weeks following the

completion of the surveys. Copies of all CNDDB forms shall be submitted to the CDFG following submittal of the letter report of findings.

The project owner shall provide the CEC Compliance Project Manager a final copy of the Sensitive Plant Relocation Plan prior to initial grading. The Sensitive Plant Relocation Plan will provide a detailed description of the methods used to describe the existing conditions, collection process, transfer process, installation, and maintenance. Each plant will have a set of existing conditions that will be documented including but not limited to habitat type, terrain, orientation, soils, and slope aspect. Each plant will be relocated to an area within a proposed mitigation parcel that matches the previous location to the extent possible. The plan will include a detailed description of the most appropriate collection methods minimizing plant impacts and shock during relocation. The Plan will also include a detailed description of the transfer process, which will include but is not limited to how the plants will be transferred, how long they will be out of the ground, and where the plants will be stored prior to planting. The Sensitive Plant Relocation Plan will also include a detailed description of the maintenance and monitoring requirements to ensure a successful relocation process. The monitoring process includes annual monitoring and maintenance for a 5-year period. The plan will also include a contingency plan in case the relocation efforts are not successful.

3.1.2 - Sensitive Wildlife Species

The following will reduce potential project-related impacts to special status wildlife species to less than significant. To avoid any direct or indirect impacts to sensitive wildlife species, a Biological Monitor will be required to monitor construction activities. The Biological Monitor requirements and duties are described below:

MM BIO-3 The project owner shall submit the resume, at least three references and contact information of the proposed Biological Monitor to the CEC Compliance Project Manager for approval. The Designated Biologist must at least meet the following minimum qualifications:

1. Bachelor's Degree in biological sciences, zoology, botany, ecology, or a closely related field;
2. Three years of experience in field biology or current certification of a nationally recognized biological society, such as The Ecological Society of America or The Wildlife Society; and
3. At least one year of field experience with biological resources found in or near the project area.

In lieu of the above requirements, the resume shall demonstrate to the satisfaction of the CEC Compliance Project Manager that the proposed Biological Monitor or alternate has the appropriate training and background to effectively implement the conditions of certification.

Verification: The project owner shall submit the specified information at least 45 days prior to the start of pre-construction site mobilization. No pre-construction site mobilization activities shall commence until an approved Biological Monitor is available to be onsite. If a Biological Monitor needs to be replaced, the specified information of the proposed replacement must be submitted to the CEC Compliance Project Manager at least 10 working days prior to the termination or release of the preceding Biological Monitor. In an emergency, the project owner shall immediately notify the CEC Compliance Project Manager to discuss the qualifications and approval of a short-term replacement while a permanent Biological Monitor is proposed to the CEC Compliance Project Manager for consideration.

MM BIO-4 The project owner shall ensure that the Biological Monitor performs the following during any site (or related facilities) mobilization, ground disturbance, grading, construction, operation, and closure activities. The Biological Monitor may be assisted by the approved Biological Monitor(s), but remains the contact for the project owner and CEC Compliance Project Manager.

1. Advise the project owner's construction and operation managers on the implementation of the Biological Resources Conditions of Certification;
2. Be available to supervise, conduct, and coordinate mitigation, monitoring, and other biological resources compliance efforts, particularly in areas requiring avoidance or containing sensitive biological resources, such as special status species or their habitat;
3 Clearly mark sensitive biological resource areas and inspect these areas at appropriate intervals for compliance with regulatory terms and conditions;
4 Notify the project owner and the CEC Compliance Project Manager of any non-compliance with any Biological Resources Condition of Certification;
5 Respond directly to inquiries of the CEC Compliance Project Manager regarding biological resource issues; and
6. Maintain written records of the tasks specified above. Summaries of these records shall be submitted in the Monthly Compliance Report during project construction.

Verification: The Biological Monitor shall submit a Monthly Compliance Report to the CEC Compliance Project Manager. Included in the report will be copies of all written reports and summaries that document activities that affect biological resources. If actions potentially affect biological resources during operation a Biological Monitor shall be available for monitoring and reporting.

MM BIO-5 The project owner's Construction/Operation Manager shall act on the advice of the Biological Monitor(s) to ensure conformance with the biological resources conditions of certification. If required by the Biological Monitor(s) the project owner's

construction/operation manager shall halt all site mobilization, ground disturbance, grading, construction, and operation activities in areas specified by the Biological Monitor. The Biological Monitor(s) shall:

1. Require a halt to all activities in any area when determined that there would be an unauthorized adverse impact to biological resources if the activities continued;
2. Inform the project owner and the Construction/Operation Manager when to resume activities; and
3. Notify the CEC Compliance Project Manager if there is a halt of any activities, and advise the CEC Compliance Project Manager of any corrective actions that have been taken, or would be instituted, as a result of the work stoppage.

Verification: The project owner shall ensure that the Biological Monitor notifies the CEC Compliance Project Manager immediately (and no later than the following morning of the incident, or Monday morning in the case of a weekend) of any non-compliance or a halt of any site mobilization, ground disturbance, grading, construction, and operation activities. The project owner shall notify the CEC Compliance Project Manager of the circumstances and actions being taken to resolve the non-compliance. Whenever corrective action is taken by the project owner, a determination of success or failure would be made by the CEC Compliance Project Manager within five working days after receipt of notice that corrective action is completed, or the project owner would be notified by the CEC Compliance Project Manager that coordination with other agencies would require additional time before a determination can be made.

MM BIO-6 The project owner shall develop and implement a CEC Compliance Project Manager-approved Worker Environmental Awareness Program (WEAP) in which each of its employees, as well as employees of contractors and subcontractors who work on the project site or any related facilities during site mobilization, ground disturbance, grading, construction, operation, and closure are informed about sensitive biological resources associated with the project. The WEAP must:

1. Be developed by or in consultation with the Biological Monitor and consist of an onsite or training center presentation in which supporting written material and electronic media is made available to all participants;
2. Discuss the locations and types of sensitive biological resources on the project site and adjacent areas, if present;
3 Present the reasons for protecting these resources;
4. Present the meaning of various temporary and permanent habitat protection measures as necessary;

5. Discuss penalties for violation of applicable LORS (e.g., federal and state endangered species acts);
6. Identify whom to contact if there are further comments and questions about the material discussed in the program; and
7. Include a training acknowledgment form to be signed by each worker indicating that they received training and shall abide by the guidelines. The specific program can be administered by a competent individual(s) acceptable to the Biological Monitor.

Verification: At least 60 days prior to the start of pre-construction site mobilization, the project owner shall provide to the CEC Compliance Project Manager the proposed WEAP and all supporting written materials and electronic media prepared or reviewed by the Biological Monitor and a resume of the person(s) administering the program.

At least 10 days prior to pre-construction site mobilization, the project owner shall submit two copies of the CEC Compliance Project Manager-approved materials. The project owner shall provide in the Monthly Compliance Report the number of persons who have completed the training in the prior month and a running total of all persons who have completed the training to date.

WEAP text, and photos to be used as part of a presentation, shall be approved by the CEC Compliance Project Manager prior to the production of an electronic WEAP presentation, if the latter is to be used.

Training acknowledgement forms signed during construction shall be kept on file by the project owner for a period of at least six months after the start of commercial operation.

During project operation, signed statements for operational personnel shall be kept on file for six months following the termination of an individual's employment.

3.1.3 - Nesting Birds

The native shrubs and trees located on and within the immediate vicinity of the project site provide suitable nesting habitat for resident and migratory bird and raptor species protected under the MBTA and CFG Code. Therefore, construction of the proposed project may result in significant impacts to nesting birds protected under the MBTA and CFG Code, if construction activities commence during the general breeding season (February through August).

Potential project impacts to species protected under the MBTA and CFG Code are considered significant. Mitigation Measure BIO-8 provided below will reduce potential project impacts to nesting bird species to less than significant.

MM BIO-7 To avoid any direct and indirect impacts to raptors and/or any migratory birds, removal of habitat that may support active nests should occur outside of the

combined breeding season of mid-February to the end of August for these species. In addition, construction activities adjacent to nesting habitat should also occur outside of the breeding season for these species. If the removal of habitat and/or construction activities adjacent to nesting habitat must occur during the breeding season, the applicant shall retain a Biological Monitor to conduct a pre-construction survey to determine the presence or absence of nesting birds on and within 300 feet of the construction area and nesting raptors within 500 feet of the construction area. The pre-construction survey must be conducted within 10 calendar days prior to the start of construction, the results of which must be submitted to the CEC Compliance Project Manager for review and approval prior to initiating any construction activities. If nesting birds are detected, a Biological Monitor should be present onsite during initial vegetation removal to minimize construction impacts and ensure that no nest is removed or disturbed until all young have fledged.

Pre-construction nest surveys shall be conducted if construction activities will occur from February 1 through August 31. The Designated Biologist or Biological Monitor shall perform surveys in accordance with the following guidelines:

1. Surveys shall cover all potential nesting habitat in the project site and within 250 feet of the boundaries of the plant site as well as the natural gas line route and transmission line route. Surveys specifically for nesting Cooper's hawk, northern harriers and white-tailed kite shall be conducted within 1,000 feet of designated disturbance areas that contain appropriate nesting habitat.
2. At least two pre-construction surveys shall be conducted, separated by a minimum 10-day interval. Pre-construction surveys shall be conducted no more than 30 days prior to initiation of construction activity. One survey needs to be conducted within the 14-day period preceding initiation of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed three weeks in any given area, an interval during which birds may establish a nesting territory and initiate egg laying and incubation.
3. If active nests are detected during the survey, a no-disturbance buffer zone (protected area surrounding the nest), the size of which is to be determined by the Biological Monitor in consultation with the CEC Compliance Project Manager (in coordination with CDFG and USFWS) and monitoring plan shall be developed. Nest locations shall be mapped using GPS technology and submitted, along with a weekly report stating the survey results, to the CEC Compliance Project Manager on a weekly basis.
4. The Biological Monitor shall monitor the nest until he or she determines that nestlings have fledged. Activities that might, in the opinion of the Biological

Monitor, disturb nesting activities (e.g., excessive noise above 60 dBA), shall be prohibited within the buffer zone until such a determination is made.

Verification: Prior to the start of any pre-construction site mobilization, the project owner shall provide the CEC Compliance Project Manager a letter-report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); and a list of species observed.

If active nests are detected during the survey, the report shall include a map or aerial photo identifying the location of the nest and shall depict the boundaries of the no-disturbance buffer zone around the nest, and a monitoring plan shall be submitted to the CEC Compliance Project Manager for review and approval. Additional copies shall be provided to the CDFG and USFWS. Approval of the plan is required before construction may commence. Implementation of the measures shall be reported in the Monthly Compliance Reports by the Biological Monitor.

3.1.4 - MHPA Boundary Adjustment

The parcel that the power plant site will be located on is currently within the boundary of the MHPA established by the City of San Diego Subarea Plan. Because the plant site will require development beyond the 25 percent development limit imposed for private land within the MHPA, a boundary adjustment to the MHPA will be required.

Section 5.4.2 of the MSCP Plan provides a process for adjustments to the boundaries of the MHPA. Adjustments to the MHPA boundaries may be made without the need to amend the City of San Diego Subarea Plan if the adjustment will result in the same or higher biological value of the [MHPA]. The CEC, with the concurrence of the USFWS and CDFG, have developed a proposed mitigation strategy to allow project related impacts to be mitigated by habitat conservation within the MHPA boundary.

The MSCP Plan's Section 5.4.2 provides six biological factors necessary to evaluate biological value in a boundary change process. These factors are listed in Table 9 along with an evaluation of these factors with respect to the project site.

Table 9: MSCP Biological Evaluation Factors

Factor Listed in MSCP Section 5.4.2	Power Plant Site Parcel Evaluation
Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly or sufficiently conserved habitats, as defined in [the MSCP Plan] Section 4.2.4.	The power plant site is located within a dense stand of low to moderate quality non-native grasslands between the Sycamore Land Fill to the north and adjacent development to the south. There are few small patches of low quality Diegan coastal sage scrub along the south-facing slopes. The exchange will increase the value of the MHPA by conserving a higher quality piece of the MHPA.

Table 9 (cont.): MSCP Biological Evaluation Factors

Factor Listed in MSCP Section 5.4.2	Power Plant Site Parcel Evaluation
Effects to covered species (i.e., the exchange maintains or increases the conservation of covered species);	Covered species located on the project site are limited to the San Diego barrel cactus and variegated dudleya. These individuals will be transplanted to the preserved portion of the biological survey area.
Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves a habitat linkage or wildlife corridor);	The exchange greatly increases the function of the preserve by conserving higher value habitat, while disturbing lower quality habitat that is not associated with any wildlife corridor.
Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection for biological resources);	The exchange preserves a more efficient parcel of land that is necessary for the function and value of the preserve.
Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve); and/or	The exchange increases the amount of ecotone habitat within the preserved. The project site has little to no ecotone and provides minimal species diversity.
Effects to species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state Endangered Species Acts).	The exchange will greatly benefit the covered species identified within the project site by conserving suitable habitat. The project site provides minimal habitat for a couple of sensitive plant species, but the exchange parcel provides suitable habitat and foraging opportunities for a number of sensitive wildlife species.

By satisfying the requirements of an MHPA boundary line adjustment, the project will ensure no significant impacts to the MHPA

As part of the base-line biological surveys, fourteen potential mitigation parcels surrounding the project site were surveyed to document the existing conditions and to determine if the mitigation parcels were of higher or lower quality than the proposed project site. Also taken into consideration was the location of the proposed mitigation parcel with regard to existing and proposed conservation areas within the MHPA boundary.

MM BIO-8 Based on consultation with USFWS, CDFG, and CEC biologist, removal of a portion of the existing MHPA will be allowed if all permanent impacts to natural plant communities associated with the project will be mitigated at a 4:1 ratio within the MHPA boundary, which is inclusive of the mitigation already mentioned in Mitigation Measure BIO-1. Conservation of specific parcels will result in a higher biological value. Table 10 below indicates the project related impacts and total mitigation acreages required based on a 4:1 mitigation ratio, which will supersede impacts associated with Mitigation Measure BIO-1.

Table 10: Habitat Types/Vegetation Communities and Mitigation Acreage Calculations (Based on Supplement 3.1 Design)

Habitat/Vegetation Community	Permanent Impacts	Mitigation Ratio	Mitigation Acreage
Diegan Coastal Sage Scrub	0.82	4:1	**3.28**
Disturbed Habitat	0.35	4:1	**1.40**
Native Grassland	0.06	4:1	**0.24**
Non-Native Grassland	10.82	4:1	**43.28**
Total	**12.05**		**48.20**

Based on the proposed mitigation previously mentioned in Mitigation Measure BIO-1, a total of 57.29 acres of habitat will be conserved within parcels 366-03-031, -112, 366-08-027, and -028. The first 12.05 acres of habitat conserved within those parcels will be designated as mitigation for direct impacts to the MHPA Boundary Line adjustment, which is the total amount of permanent impacts within the MHPA Boundary. The next 25.08 acres will be designated as mitigation for impacts to upland plant communities and the remaining of the acreage necessary to meet the 4:1 mitigation ration. The conservation of the proposed mitigation parcels provides an excess of 9.09 acres of higher quality habitat than the habitat located within the project site.

3.1.5 - Adjacency Management Guidelines

Once the power plant site is removed from the MHPA boundary, the project features will be located immediately adjacent to the new MHPA boundary. The City of San Diego Subarea Plan provides specific guidelines to reduce project related impacts associated with project immediately adjacent to the MHPA. Adjacency Management Guidelines (discussed in Section 5.2.5 of this document) are designed to reduce any potential indirect impacts, relating from the construction and maintenance of the proposed project, to resources adjacent to the project to less than significant.

The project will be required to adhere to the set Adjacency Guidelines in the City of San Diego MSCP Subarea Plan, which are intended to address indirect effects associated with locating new development in proximity to the MHPA or an environmentally sensitive area. The Adjacency Guidelines and other general impact avoidance and minimization measures are discussed below as Mitigation Measure BIO-10, and will be incorporated into the project design to ensure that potential indirect project-related impacts involving drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development, are avoided or minimized.

MM BIO-9 **Drainage.** Project drainages should be directed onto natural detention basins, grass swales, mechanical trapping devices, or other remedial project elements and away from the MHPA, and should be maintained to ensure proper function. Projects should develop and implement urban runoff and drainage plans to minimize or

eliminate potential impacts to adjacent preserve areas. All new development projects will be required to meet National Pollutant Discharge Elimination System (NPDES) standards and incorporate Best Management Practices (BMPs) as defined by the City's Standard Urban Storm Mitigation Plan (SUSMP).

Pursuant to San Diego Regional Water Quality Control Board Municipal Permit, and the City of San Diego Storm Water Management Standards Requirements Manual, which includes SUSMP, all development and redevelopment located within or directly adjacent to or discharging directly to an environmentally sensitive area are required to implement site design, source control, and treatment control BMPs, and shall at minimum, include the BMPs listed in Section 7.5.2 of the Plan. All NPDES-regulated projects shall implement a combination of BMPs as close to potential pollutant sources as feasible.

The project shall implement physical stabilization and sediment control BMPs in order to prevent or reduce to the maximum extent practicable erosion from exposed slopes directed toward the Preserve. Perimeter protection and resource protection methods shall be used during the construction phase of the proposed project. Sediment ingress and discharge in sheet flows should be prevented to the maximum extent practicable by the establishment of silt fences, fiber rolls, or sand bag barriers in downslope positions directing potential discharge away from the preserve. These BMPs shall be properly installed prior to construction initiation by qualified personnel, and shall remain in place through the duration of construction activities adjacent to the Preserve. Sufficient materials needed to install standby erosion and sediment control BMPs necessary to protect exposed portions of the site from potential erosion and to prevent potential sediment discharges into the preserve shall be stored onsite.

Toxic Substances. The proposed project may have the potential to cause the release of hazardous materials from construction-related activities. The most common toxic substances that may be introduced into the project site during construction are specifically associated with construction equipment. The release of fuel, hydraulic fluid, oils, and/or other substances from equipment may be potentially toxic, or result in adverse impacts to natural resources adjacent to the site. To reduce potential impacts caused by the application and/or drainage of such materials into the adjacent open space areas, the project shall stage and re-fuel all equipment away from the project site and use BMPs with regard to equipment use and staging. Methods shall be consistent with requirements of the Regional Water Quality Control Board (RWQCB) and NPDES standards.

Lighting. Lighting for the project shall be designed, installed, and maintained to prevent side casting of light towards the project boundaries. Lighting shall be shielded, directional, and at the lowest intensity required for safety. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the adjacent open space areas and sensitive species from night lighting. Consideration should be given to the use of low-pressure sodium lighting.

Noise. Uses in or adjacent to the preserve should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to preserve areas and any other use that may introduce noises that could impact or interfere with wildlife utilization of the preserve. Excessive noisy uses or activities adjacent to breeding areas, including temporary grading activities, must incorporate noise reduction measures or be curtailed during the breeding season of sensitive bird species, consistent with Table 3-5 of the MSCP Subregional Plan.

Portions of the proposed project occurs in the vicinity of suitable nesting and/or foraging habitat for the coastal California gnatcatcher, and other migratory bird species. The proposed project includes limited equipment that will be housed within a noise-reducing cabinet located away from nesting habitat, and no noise impacts are expected to result during the operational phase of the proposed project. However, the proposed project may result in noise impacts during the construction phase. Where noise associated with clearing, grubbing or grading will negatively impact an occupied coastal California gnatcatcher and/or any other migratory bird nest between February 15 and August 31, clearing, grubbing, or grading activities will be modified if necessary to prevent noise from negatively impacting the breeding success of any coastal California gnatcatcher, nesting raptor, and/or other migratory bird species. Noise reduction techniques shall be implemented into the construction phase of the project if any active coastal California gnatcatcher and/or other migratory bird nests are observed. Further measures to reduce impacts to nesting birds covered under the MBTA and CFG Code are discussed in Mitigation Measure BIO-2.

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 location and reduce domestic animal predation.

Invasives. No invasive non-native plant and/or wildlife species shall be introduced into areas immediately adjacent to the MHPA.

Brush Management. Proposed project development located adjacent to and topographically above the MHPA must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 will be the responsibility of the landowner or other private property.

Grading/Land Development. Manufactured slopes associated with the site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Limit Disturbance Area. Clearly demarcate construction exclusion zones around biologically sensitive areas, including but not limited to all areas containing sensitive biological resources identified during pre-construction surveys. Vehicles and personnel shall be prohibited from entering sensitive habitats. Protection would include wildlife exclusion fencing and/or silt fencing, signs, and sediment control measures installed prior to pre-construction site mobilization. Standard Best Management Practices from the project Stormwater Pollution Prevention Plan the will be implemented during all phases of the project.

Minimize Impacts of Transmission Lines. Transmission lines and all electrical components shall be designed, installed, and maintained in accordance with the Avian Power Line Interaction Committee (APLIC), Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006) to reduce the likelihood of electrocutions of large birds.

Avoid Wildlife Pitfalls. At the end of each work day, the Designated Biologist or Biological Monitor shall ensure that all potential wildlife pitfalls (trenches, bores, and other excavations) have been backfilled. If backfilling is not feasible, all trenches, bores, and other excavations shall be sloped at a 3:1 ratio at the ends to provide wildlife escape ramps, or covered completely to prevent wildlife access. Should wildlife become trapped, the Designated Biologist or Biological Monitor shall

remove and relocate the individual to a safe location. Any wildlife encountered during the course of construction shall be allowed to leave the construction area unharmed.

Avoid Entrapment of Wildlife. Any construction equipment, pipe, culvert, or similar structure with a diameter of 4 inches or greater, stored less than 8 inches above ground for one or more days/nights, shall be inspected for wildlife before the material is moved, buried, or capped. As an alternative, all such structures may be capped before being stored, or placed on pipe racks.

Report Wildlife Injury and Mortality. Report all inadvertent deaths of special-status species to the appropriate project representative, including road kill. Species name, physical characteristics of the animal (sex, age class, length, weight), and other pertinent information shall be noted and reported in the Monthly Compliance Reports. Injured animals shall be reported to CDFG and/or USFWS and the CPM and the project owner shall follow instructions that are provided by CDFG or USFWS. The USFWS office shall be notified in writing within three working days of the accidental death or injury to special-status species during project-related activities.

Avoid Spread of Noxious Weeds. The project owner shall implement the following measures during construction and operation to prevent the spread and propagation of noxious weeds:

A. Limit the size of any vegetation and/or ground disturbance to the absolute minimum and limit ingress and egress to defined routes;
B. Use only weed-free straw, hay bales, and seed for erosion control and sediment barrier installations. Invasive non-native species shall not be used in landscaping plans and erosion control. Monitor and rapidly implement control measures to ensure early detection and eradication of weed invasions.

Worker Guidelines. During construction, all trash and food-related waste shall be placed in self-closing containers and removed weekly from the site. Workers shall not feed wildlife or bring pets to the project site. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons.

Limit Vehicle Impacts. Vehicles shall be confined to established roadways and pre-approved overland access routes. Limit access routes and the number and size of staging areas and work areas to the minimum necessary to achieve the project goals. Routes and boundaries of work areas, including access roads, shall be clearly marked prior to initiating project construction.

Implement Pesticide Use Best Management Practices. During construction and operation, the project owner shall conduct pesticide management in accordance with standard Best Management Practices (BMPs). The BMPs shall include non-point source pollution control measures. The project owner shall use a licensed herbicide applicator and obtain recommendations for herbicide use from a licensed Pest Control Advisor. Herbicide applications must follow EPA label instructions. Minimize use of rodenticides and herbicides in the project area and prohibit the use of chemicals and pesticides known to cause harm to non-target plants and wildlife. The project owner shall only use pesticides for which a "no effect" determination has been issued by the EPA's Endangered Species Protection Program for any species likely to occur within the project area or downstream. If rodent control must be conducted, zinc phosphide or an equivalent product shall be used.

Verification: Implementation of the measures will be reported in a Monthly Compliance Reports by the Biological Monitor. Within 30 days after completion of project construction, the project owner shall provide to the CEC Construction Project Monitor, for review and approval, a written construction termination report identifying how measures have been completed. Additional copies shall be provided to the CDFG and USFWS.

3.1.6 - Indirect Impacts

Following installation of the proposed project site, indirect impacts to nitrogen deposition, invasive weeds, and downstream water quality are expected to occur.

Nitrogen Deposition

Although the San Diego MSCP provides incidental take for federally and state listed endangered and threatened species, the nitrogen deposition impact is not discussed in the MSCP and therefore is not a covered activity. To mitigate for nitrogen deposition impacts to critical habitat and associated listed species (California gnatcatcher), prior to start of project operation the project owner shall fund one or more of the following options:

MM BIO-10 **(Option 1: Land Acquisition).** Project related impacts are calculated so they are proportional to the proposed project's contribution to nitrogen deposition occurring at USFWS-designated critical habitat. Total Amount of Critical Habitat Acres is multiplied by the Increase in Nitrogen Deposition and then divided by the Based Line Nitrogen Deposition Rate. Based on the current air-modeling (CalPuff 2012), the proposed project will potentially impact approximately 1500 acres of USFWS designated critical habitat for coastal California gnatcatcher. The increase in Nitrogen Deposition at the USFWS designated Critical Habitat Areas is 0.1 kg/he/yr. The base line nitrogen deposition rate is 10.94 kg/he/yr.

Therefore, the total amount of mitigation lands required for conservation with regard to nitrogen deposition impacts is 13.71 acres. The 13.71 acres of conservation will be in addition to the conservation areas discussed above. The excess 9.09 acres of mitigation habitat is not sufficient mitigation for the nitrogen deposition impacts. An additional 4.62 acres of mitigation land would be required to complete the required mitigation under a land acquisition option. In addition, this habitat will also require a restoration and enhancement program to provide higher quality habitat for coastal California gnatcatcher.

MM BIO-10 **(Option 2: Weed Abatement Program).** Provide funding to support an existing noxious weed abatement program within USFWS designated critical habitat for coastal California gnatcatcher. Project related impacts are calculated so they are proportional to the proposed project's contribution to nitrogen deposition occurring at USFWS-designated critical habitat.

If Quail Brush proposes to establish a weed abatement program, the project owner shall conduct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate long-term fee to fund the weed abatement program for the identified lands for the life of the project (approximately 30 years). The project shall also demonstrate that the lands on which the new weed abatement program will be conducted are under conservation easement or otherwise protected in perpetuity. If the project owner proposes to fund an established weed abatement program, the project owner shall identify the cost of funding the weed abatement program lands for the life of the project as determined by the entity implementing the program.

Quail Brush Genco, LLC will submit to the CEC Compliance Project Manager the name of the entity that will be implementing the program for the life of the Quail Brush project and the endowment funds in the amount determined to be adequate to provide funding for weed abatement on the required acres for the life of the Quail Brush project. The entity to implement the program and the amount of the endowment shall be approved by Quail Brush Genco, LLC in consultation with the USFWS, CDFG, and the City of San Diego staff.

MM BIO-10 **(Option3: Onsite Weed Abatement Program).** If Quail Brush Genco, LLC chooses to establish a new weed abatement program, the Quail Brush Genco, LLC shall submit a weed abatement plan to the CEC Compliance Project Manager for review and approval and to the USFWS, CDFG, and the City of San Diego staff for review and comment. The weed abatement plan shall include the following for the mitigation lands:

(1) existing conditions at the site(s) and goals for habitats and specific plant populations to be managed and monitored;
(2) site preparation methods (weed control treatments, soil preparation methods, native species protection methods, timing);
(3) weed abatement and site restoration specifications;
(4) short (12 months or less) and long-term maintenance and monitoring schedule and methods.

If the weed abatement program will be implemented within the nitrogen deposition impact area, then the weed abatement program shall include a biological monitoring component to assess populations of coastal California gnatcatcher within the affected area for any long-term effects of competition from noxious weeds. If funding is provided to an existing weed abatement program, the project owner shall submit the management plan or other statement of work from the existing program.

Management activities funded may include but are not limited to: noxious weed eradication using appropriate methods at the optimal time-of-year to limit seed dispersion and avoid impacts to species, native seed application from local sources (preferably onsite) including planting of shrubs in appropriate habitat for California gnatcatcher. Quail Brush Genco, LLC also shall request an annual report from the San Diego Foundation or other third-party approved by the CEC Compliance Project Manager documenting how each annual payment provided from the endowment required

Verification

Option 1. At least 30 days prior to the start of project operation the Quail Brush Genco, LLC shall provide to the CEC Compliance Project Manager for approval, in consultation with the CDFG, USFWS, and the City of San Diego staff, the name of the land management entity, written verification that the compensation lands have been purchased, and written verification that the appropriate endowment fund amount (determined by the PAR analysis) has been received by the approved endowment management entity.

Option 2. At least 30 days prior to the start of project operation, Quail Brush Genco, LLC shall submit a final proof of participation in an appropriate Weed Abatement Program to the CEC Compliance Project Manager. The proposed weed abatement program will be approved by the CEC Compliance Project Manager prior to securing proof of purchase.

Option 3. At least 30 days prior to the start of project operation, Quail Brush Genco, LLC shall submit a final Weed Management Plan to the CEC Compliance Project Manager. The program will include periodic weed eradication during optimum removal periods, when the plants are approximately 6 inches off the ground prior to going to seed. Currently the survey area has minimal

native grassland areas, but with the removal of dense non-native grassland areas within the conservation area and temporary construction work areas, it will also promote higher quality native grasslands.

No less than 30 days prior the start of project operation, Quail Brush Genco, LLC shall provide written verification to the CEC Compliance Project Manager that the endowment has been paid in full to San Diego Foundation or other third-party approved by the CEC Compliance Project Manager in accordance with this condition of certification. Quail Brush Genco, LLC shall provide evidence that it has specified that its annual payment from the endowment to the third-party approved by the CEC Compliance Project Manager can be used only to assist in noxious weed management and remediation of its effects (e.g., activities to support continued survival of California gnatcatcher,) at approved locations within critical habitat or habitat that contains the Primary Constituent Elements for these species that is protected in perpetuity.

Thereafter, within 30 days after each anniversary date of the commencement of project operation, Quail Brush Genco, LLC also shall request an annual report from the San Diego Foundation or other third-party approved by the CEC Compliance Project Manager documenting how each annual payment from the endowment required hereunder was used and applied to assist in noxious weed management and/or habitat restoration/enhancement at approved locations for these species. Quail Brush Genco, LLC shall provide copies of such reports to the CEC Compliance Project Manager within 30 days of receipt. This verification shall be provided annually for the operating life of the project.

Invasive Plants

Weed eradication is imperative to suppress competition that could prevent establishment of the native plantings following the restoration effort within temporary impact areas within the project site. Timing is the most important factor in obtaining effective and efficient control. This mitigation measure is specifically directed to post-project restoration and is not specifically associated with impacts associated with Nitrogen Deposition Mitigation covered under Mitigation Measure BIO-10.

MM BIO-11 Prior to construction, weeds should be removed before seed production occurs. Several weed control methods may be used effectively prior to, during, and immediately following construction activities including truck washing, manual weed pulling, and/or selective herbicide applications.

Therefore, a maintenance crew must be prepared to respond to weed control needs rapidly and the restoration biologist must provide adequate supervision for maintenance personnel that may not be skilled at identifying and discriminating between weeds and native species. Herbicides must be applied selectively, and supervised by maintenance personnel familiar with native vegetation, to avoid

damaging native plant species. The restoration biologist must approve any herbicide application in advance.

All vehicles should be cleaned at a designated wash area prior to initial grading of the project site. Vehicles should also be cleaned prior to leaving the site. This will prevent seeds from non-native weedy species from germinating on site.

Weed debris should be removed from the project area and disposed of as permitted by law. Pulled weeds should be placed on a tarp to prevent the seeds from touching the ground.

Target species that are typically detrimental to native revegetation are included, but not limited to, those listed in Table 11.

Table 11: Target Weed Species

Scientific Name	Common Name
Ailanthus altissima	Tree of heaven
Atriplex semibaccata	Australian saltbush
Brassica spp.	Mustard
Brassica tournefortii	Sahara mustard
Polypogon monspeliensis	Rabbit's foot grass
Carduus spp.	Thistle species
Cirsium vulgare	Bull thistle
Cynara cardunculus	Artichoke thistle
Centaurea solstitialis	Star thistle
Centaurea melitensis	Tocalote
Lactuca serriola	Prickly lettuce
Pennisetum setaceum	Fountain grass
Medicago polymorpha	Bur clover
Melilotus spp.	Sweet clover
Nicotiana glauca	Tree tobacco
Raphanus sativus	Wild radish
Ricinus communis	Castor bean
Robinia pseudoacacia	Black locust
Salsola tragus	Russian thistle
Silybum marianum	Milk thistle

Table 11 (cont.): Target Weed Species

Scientific Name	Common Name
Sisymbrium irio	London rocket
Spartium junceum	Spanish broom
Tamarix ssp.	Tamarisk
Xanthium strumarium	Cocklebur

Verification: At least 30 days prior to the start of project operation the project owner shall provide to the CEC Compliance Project Manager for approval, a weed eradication plan. Implementation of the plan will be reported in a Monthly Compliance Reports by the Biological Monitor. Within 30 days after completion of project construction, the project owner shall provide to the CEC Construction Project Monitor, for review and approval, a written construction termination report identifying how measures have been completed.

3.1.7 - Federal Biological Opinion

The proposed project site will indirectly impact USFWS designated critical habitat. Since the Quail Brush project requires a federal permit from the U.S. Environmental Protection Agency with regard to impact to Air Quality Impacts. Therefore, the proposed project has a federal nexus that requires the USFWS to prepare a Biological Opinion.

MM BIO-12 The project owner shall provide to the CEC Compliance Project Manager a copy of the Biological Opinion per Section 7 of the federal Endangered Species Act written by the U. S. Fish and Wildlife Service in consultation with U.S. Environmental Protection Agency. The terms and conditions contained in the Biological Opinion shall be incorporated and implemented by the project owner.

Verification: At least 30 days prior to the start of any pre-construction site mobilization activities, the project owner shall submit to the CEC Compliance Project Manager a copy of the U.S. Fish and Wildlife Service's Biological Opinion and verification that the terms and conditions contained in the Biological Opinion and will be implemented by Quail Brush Genco, LLC.

SECTION 4: REFERENCES

Atmospheric Dynamics, Inc., G. Darvin. 2012. Nitrogen Deposition Analysis Results for QBPP. September 21.

Atwood, J.L. and J.S. Bolsinger. 1992. Elevational distribution of California Gnatcatchers in the United States. Journal of Field Ornithology 63: 159-168.

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

Bennett, A.F., 1990. Habitat corridors: Their role in wildlife management and conservation. Arthur Rulah Institute for Environmental Research. Department of conservation and environment, Melbourne.

Burt, W.H., and Grossenheider, R.P. 1980. Peterson Field Guides, Mammals. Houghton Mifflin Company. New York, New York.

Cal IPC. 1999. Exotic Pest Plants of Greatest Ecological Concern in California. California Invasive Plant Council. 1999.

California Department of Fish and Game (CDFG). 2003. List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database. California Department of Fish and Game, Wildlife and Habitat Data Analysis Branch. Sacramento, California. September.

California Department of Fish and Game (CDFG). 2011. Special Animals List. The Resources Agency State of California, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base. Sacramento, California. January.

California Department of Fish and Game (CDFG). 2012. Endangered and Threatened Animals List. The Resources Agency of California, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base. Sacramento, California. January.

California Department of Fish and Game (CDFG). 2012. Endangered, Threatened, and Rare Plants. The Resources Agency of California, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base. Sacramento, California. July.

California Department of Fish and Game (CDFG). 2012. Special Vascular Plants, Bryophytes, and Lichens. California Department of Fish and Game, Natural Diversity Data Base. The Resources Agency of California. Sacramento, California. 79 pp. July.

California Native Plant Society (CNPS). 2011. Electronic Inventory from website: http://www.northcoast.com/~cnps/cgi-bin/cnps/sensinv.cgi. July 2012.

California Natural Diversity Data Base (CNDDB). 2012. RareFind 4 personal computer program. Data Base Record Search for Information on Threatened, Endangered, Rare, or Otherwise Sensitive Species for the La Mesa, California USGS Topographic Quadrangles. California Department of Fish and Game, Natural Heritage Division. Sacramento, California.

City of San Diego. 2001. Land Development Code Biology Guidelines. May 19. (As amended by Resolution No. R-294943). Provided by the City of San Diego Development Services Department, July 2002.

City of San Diego. 2002. Significance Determination Guidelines Under the Environmental Quality Act - Biological Resources. Page 11. Provided by the City of San Diego Development Services Department, July.

City of San Diego. City of San Diego MSCP Subarea Plan, March 1997. Available for public review at the City of San Diego planning department.

City of San Diego. Guidelines for Conducting Biological Surveys. 2002. Biological Review References. Provided by the City of San Diego Development Services Department. July.

Consortium of California Herbaria. 2008. Data provided by the participants of the Consortium of California Herbaria (Website: www.ucjeps.berkeley.edu/consortium/).

ESRI. ArcView. Version 9.1.

Fahrig, L. and H.G. Merriam. 1985. Habitat patch connectivity and population survival. Ecology 66: 1762-1768.

Fenn, et al. 2003. Ecological Effects of Nitrogen Deposition in the Western United States. BioScience 53(4): 404-420.

Google Earth Version 4.3. 2011. Aerial Photographs.

Harris, Larry D. and P.B. Gallagher. New initiatives for wildlife conservation: the need for movement corridors. In Defense of Wildlife: Preserving Communities and Corridors. Washington, D.C.: Defenders of Wildlife, 1989.

Hickman, J.C. 1993. The Jepson Manual: Higher Plants of California. University of California Press. Berkeley, California.

Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Non-game Heritage Program. California Department of Fish and Game. Sacramento, California.

Jennings, M.R. and Hayes, M.P. 1994. Amphibian and reptile species of special concern in California. Final Report submitted to the California Department of Fish and Game, Inland Fisheries Division. Contract No. 8023.

Kaufman, K. 2006. Lives of North American Birds. Houghton Mifflin, New York, New York.

Lightner, J. 2006. San Diego County Native Plants. Second Ed. San Diego Flora. San Diego, California.

MacArthur, R.H. and Wilson, E.O. The Theory of Island Biogeography. Princeton University Press (Princeton, NJ). 1967.

Michael Brandman Associates (MBA). 2011a. Focused Survey for Sensitive Plant Species. Tetra Tech EC, Inc.

Michael Brandman Associates (MBA). 2011b. Focused Survey of Coastal California Gnatcatcher. Tetra Tech EC, Inc.

Michael Brandman Associates (MBA). 2011c. Jurisdictional Delineation of Waters of the United States. Tetra Tech EC, Inc.

Michael Brandman Associates (MBA). 2012a. Focused Survey for Sensitive Plant Species. Tetra Tech EC, Inc.

Michael Brandman Associates (MBA). 2012b. Focused Survey of Coastal California Gnatcatcher. Tetra Tech EC, Inc.

Michael Brandman Associates (MBA). 2012c. Quino Checkerspot Butterfly Protocol Survey Report. Tetra Tech EC, Inc.

National Geographic Society. 1987. National Geographic Society Field Guide to the Birds of North America. 2nd Edition. National Geographic Society, Washington DC.

Nationwide Environmental Title Research, LLC. 2011. Website: www.historicaerials.com. NetroOnline.

Oberbauer, T. 1996. Terrestrial Vegetation Communities in San Diego County Based on Holland's Descriptions. San Diego Association of Governments, San Diego, California.

Recon. 2012. Biological Technical Report for the Sycamore Landfill Expansion Project. San Diego, California.

Reiser, C.H. 1994. Rare plants of San Diego County. Aquafir Press, Imperial Beach, California. (Website: http://sandiego.sierraclub.org/rareplants/).

Sawyer, J.O. and T. Keeler-Wolf. 1995. A Manual of California Vegetation. California Native Plant Society. Sacramento, California.

Sibley, D.A. 2003. The Sibley Field Guide to Birds of Western North America. Alfred A. Knopf, New York, USA. 471 p.

Simberloff, D.; Cox J. Consequences and costs of conservation corridors. *Conservation Biology* 1: 63-71; 1987

Skinner, M.W., and B. M. Pavlik. 1994. California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California. California Native Plant Society. Special Publication, No. 1, 5th ed.

Soule, M.E. 1987. History of the Society for Conservation Biology: how and why we got here. Conservation Biology 1:4-5

Stebbins, R.C. 1985. A Field Guide to Western Reptiles and Amphibians. 2nd. Ed. Houghton-Mifflin Company. Boston, Massachusetts.

Tetra Tech. 2012a. Cogentrix Quail Brush Generation Project, Supplement 3 to the Application for Certification, 11-AFC-3, Section 4.3 Noise, August 2012.

Tetra Tech. 2012b. Cogentrix Quail Brush Generation Project, Revised Air Quality Analysis and Revised Health Risk Assessment, September 2012.

Tibor, D.P. 2001. California Native Plant Society's Inventory of Rare and Endangered Plants of California. California Native Plant Society. Special Publication, No. 1, 6th ed.

Tonnesen, G., Z. Wang, M. Omary, and C.J. Chien. 2007. Assessment of Nitrogen Deposition: Modeling and Habitat Assessment. California Energy Commission, PIER Energy-Related Environmental Research. CEC-500-2005-032.

U.S. Department of Agriculture (USDA). 1978. Soil Survey: Orange County, California. Department of the Interior. U.S. Government Printing Office. Washington, DC.

U.S. Fish and Wildlife Service (USFWS). 1997. Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Guidelines. February 28.

U.S. Fish and Wildlife Service (USFWS). 2002. Birds of conservation concern 2002. Division of Migratory Bird Management, Arlington, Virginia. 99 pp.

U.S. Fish and Wildlife Service (USFWS). 2003. Recovery Plan for the Quino Checkerspot Butterfly (*Euphydryas editha quino*). Portland, Oregon. x + 179 pp.

U.S. Fish and Wildlife Service (USFWS). 2005. Federal Register, Vol. 70, No. 238. Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Brodiaea filifolia (*threadleaved brodiaea*), Final Rule.

U.S. Fish and Wildlife Service (USFWS). 2011. Personal Communication with Patrick Gower.

U.S. Geological Survey (USGS). 1968. La Mesa, California 7.5-minute Series Topographic Quadrangles, 1968, photo revised 1975.

Udvardy, M.D. 1994. National Audubon Society Field Guide to North American Birds. Alfred A. Knopf, Inc. New York, New York.

Weiss, S.B. 2006. Impacts of Nitrogen Deposition on California Ecosystems and Biodiversity. California Energy Commission, PIER Energy-Related Environmental Research. CEC-500-2005-165.