SAN MARCOS
DISCOVER LIFE'S POSSIBILITIES

Report Format and Content Recommendations

Biological Resources Report

May 2022

This page intentionally left blank.

Purpose

The Biological Resources Report Format and Content Recommendations provide guidance on preparing reports for submittal to the City of San Marcos (City) for discretionary and other projects. These guidelines are designed to accomplish the following:

1. Ensure the quality, accuracy, and completeness of the reports
2. Assist in City staff's efficient and consistent review of maps and documents from different consultants
3. Provide adequate information to make appropriate decisions and determinations regarding conformance with applicable regulations
4. Increase the efficiency of the environmental review process and avoid unnecessary time delays

This page intentionally left blank.

Table of Contents

This page intentionally left blank.

Section 1 Introduction

All biological maps and reports submitted to the City of San Marcos (City) are recommended to follow the requirements in this document. The length of reports and amount of information to include will vary depending on the size and scope of the project, regional setting, biological resources present, and degree of impacts proposed.

1.1 Full Biological Resources Report

A Full Biological Resources Report is required for all entitlement projects and/or projects with potentially significant biological impacts. The full report must include Biological Resources Maps (see Section 1.3, Biological Resources Maps).

1.2 Biological Resources Letter Report

A Biological Resources Letter Report may be adequate for smaller/ministerial projects such as a single family residence and those with limited biological resources present or expected. Through a project-specific analysis, City staff will determine if a letter report is required. Based on the information provided in the letter report, and particularly if sensitive species are found during the survey, the City may require additional focused surveys and will generally require preparation of a Full Biological Resources Report. The letter report must include a Biological Resources Map.

1.3 Biological Resources Maps

Biological Resources Maps required to be submitted to the City must include, but are not limited to: (1) Maps depicting the species that are present on the project site (Biological Resources Maps); (2) Maps depicting the historical occurrences on the project site (Historical Biological Resources Occurrence Map) and 3) Proposed projects limits plotted as an overlay on Biological Resources Maps. The project's limits of work should be inclusive of any grading, staging area, retaining walls and other miscellaneous features that result in ground disturbance and impacts to Biological Resources. The Biological Resources Map shall include wildlife and plant identifications made during site visits or surveys directly through visual observation or indirectly through calls or burrow, track, or scat detection. All identifications should be shown on the map at the Global Positioning System (GPS) coordinate location recorded during identification. The Historical Biological Resources Occurrence Map shall include all wildlife and plant data identified during reviews of existing maps, literature, sensitive species occurrence databases, and other biological studies conducted on the project site.

For projects consisting of mostly or entirely hardscape in a developed urban setting with little to no natural settings (not including ornamental or landscaped vegetation) remaining on or surrounding the site and/or no sensitive species anticipated, a Biological Resources Map may be adequate without a report. The consultant/applicant may, at their option, submit a brief explanation

of the map. City staff, however, may determine if further information is necessary and may request that other documentation be submitted with the map, as determined by City staff.

This page intentionally left blank.

Section 2 Report Format Requirements

2.1 General Report Guidelines

All reports shall follow these general guidelines:

- Reports shall be technical in nature and avoid anecdotal or extraneous information.
- Reports shall be concise and written in a professional manner suitable for peer review. City staff may reject reports based on quality if the report is written in such a manner that a timely and accurate review cannot be completed.
- Attached plans and Biological Resources Maps shall be to scale and contain a north arrow and both number and bar scales. When maps are reduced, adjust the scale or mark the map "Reduced/Use Bar Scale."
- For Full Biological Resources Reports, each section and subsection of the report shall be clearly delineated and may use the numerical headings contained in these Biological Resources Report Format and Content Recommendations.
- Draft copies of the report shall have all changes made in response to City staff comments in strikeout/underline form. Final copies of the report shall be clean, with all editing marks removed.

All biological reports will be reviewed for technical accuracy and completeness by City staff and the City's peer review consultant, as deemed necessary by City staff, The applicant will be responsible for any costs associated with Peer-review of the report. Reports are considered draft until City staff determines the report to be complete. Each submittal and review of a draft biological report is considered a "version." For each version, City staff will either determine the report to be complete or provide comments on necessary changes.

2.2 Full Biological Resources Report

2.2.1 Outline

The required sections of the Full Biological Resources Report are provided in the outline below.

Cover Page
Table of Contents
    List of Tables
    List of Appendices
Glossary of Terms and Acronyms
Summary (Abstract)
1.0 Introduction
    1.1 Purpose of the Report
    1.2 Project Location and Description

2.0 Agency Consultation
3.0 Environmental Setting (Existing Conditions)
4.0 Regulatory Setting
    4.1 Federal
    4.2 State
    4.3 Regional
    4.4 Local
5.0 Survey Methods
    5.1 Literature and Database Review
    5.2 General Biological Surveys
    5.3 Focused Surveys
    5.4 Aquatic Resources Delineation
6.0 Results
    6.1 Vegetation Communities and Land Cover Types
    6.2 Aquatic Resources
    6.3 Observed Plants
    6.4 Observed Wildlife
    6.5 Sensitive Species
        6.5.1 Critical Habitat
        6.5.2 Sensitive Plant Species Observed or with Potential to Occur
        6.5.3 Sensitive Wildlife Species Observed or with Potential to Occur
    6.6 Habitat Connectivity and Wildlife Corridors
7.0 Project Impacts, Significance, and Mitigation Measures
    7.1 Significance Guidance/Criteria
    7.2 Impacts and Significance
    7.3 Summary of Mitigation Measures
8.0 Summary of Mitigation Measures
9.0 References
10.0 List of Preparers

Technical Appendices/Attachments (order will be determined by reference in report)

A Figures (unless included in body of report) (including Biological Resources Maps)
B Observed Species Lists – Plants and Wildlife
C Signed Survey Reports (i.e., 45-day reports and other supplemental survey reports)
D Any other documents (i.e., datasheets)

2.2.2 Content

Cover Page

The cover page shall include the following information:

- Project number and name
- Date (original report date plus all revisions), which must be revised in each version of the draft report
- Name of City-approved California Environmental Quality Act (CEQA) consultant preparing document, firm name (if applicable), and address
- Signature of City-approved CEQA consultant
- Project proponent's name and address
- The following statement: Prepared for the City of San Marcos

Table of Contents

The table of contents shall follow the order and format outlined in these Biological Resources Report Format and Content Recommendations. Page numbers should be assigned when possible. Titles of the tables, figures, appendices should be listed in the order in which they appear in the report.

Glossary of Terms and Acronyms

Provide a list of terms and acronyms used in the report.

Summary (Abstract)

Provide a brief summary of the project, the biological resources present on the site, potential impacts, and proposed mitigation. No new information shall be provided in the summary that is not further explained elsewhere in the report. The purpose of the summary is to provide a quick reference for the public and decision-makers. Therefore, the language shall be less technical than that used in the remainder of the report.

1.0 Introduction

1.1 Purpose of the Report

Discuss the purpose of the report. Depending on the site location, type of project, and biological resources, the report may document compliance with federal, state, and local laws.

Example language: "The purpose of this report is to document the biological resources identified as present or potentially present on the project site; identify potential biological resources impacts resulting from the project; and recommend measures to avoid, minimize, and/or mitigate significant impacts consistent with federal, state, and local rules and regulations, including the

CEQA, City of San Marcos – Draft Subarea Plan as a guidance document, and North County Multiple Habitat Conservation Program."

1.2 Project Location and Description

Project Location. Discuss the project location in the regional and local context, and identify the General Plan and zoning designations. Include a project location map as a numbered figure in the report using a U.S. Geological Survey topographic map with the site and Assessor's Parcel Numbers clearly identified and labeled.

Project Description. Provide a detailed description of the project, including any design alternatives and all project components (i.e., staging areas and equipment storage areas or other areas not directly on the main project site).

Describe the whole of the project, not just the immediate action being pursued. For example, a Tentative Parcel Map proposes to subdivide property. The project in question is not just the increase in the number of lots but the ultimate outcome of residential or commercial development. Another example is an application for a grading permit. The project is not just the immediate grading but also the end result for which the land was graded.

The project description shall be as detailed as possible and include the following details:

- Size of the project site and area proposed for development
- Purpose and scale of the proposed uses associated with the project, such as residential development
- Proposed structures (e.g., size, location, purpose)
- Location of all easements, including those for biological open space, utilities, and roads
- Proposed or potential uses within open space, including proposed buffers, existing structures, and/or uses that will continue under the proposed action
- Off-site improvements, such as roads, utility extensions, or stormwater facilities
- Fire fuel modification and vegetation management requirements, including fuel modification adjacent to roads or adjacent properties as determined by the Fire Marshal
- Construction equipment staging areas
- Proposed site access

2.0 Agency Consultation

This section provides a (bulleted) narrative of consultation between the project proponent/applicant and/or the environmental consultant and any resource agencies (U.S. Army Corps of Engineers [USACE], U.S. Fish and Wildlife Service [USFWS], California Department of Fish and Wildlife [CDFW], Regional Water Quality Control Board [RWQCB]) wherein discussions of resources, potential project impacts, and mitigation occurred.

3.0 Environmental Setting (Existing Conditions)

Describe the physical characteristics, such as topography, elevation, climate, water resources, and soil types. Briefly describe the general vicinity in terms of type and density of development and infrastructure. Specify public and private ownership of land in the vicinity, particularly for preserved lands. Describe any preserved lands adjacent or contiguous with the site. Describe the existing land uses, including unauthorized activities, on site and on surrounding land.

Provide descriptive text for any unique habitat types and/or physical features of the land that occur on site due to soil type or topography or those habitats created by unusual circumstances. Examples of unique habitats include vernal pools or rare successional habitat communities. Unique features include any physical characteristic that might have unusual or exceptional biological value, such as cliff faces, rock outcrops, sandstone bluffs, and stream banks and bars. While unique features are often geological in nature, they can also be the result of a water resource, soil, or manufactured structures. These features are important to note and should be discussed in relation to special biological resources (e.g., cliff faces and bats) in Section 6.0, Results.

4.0 Regulatory Setting

This section summarizes federal, state, regional, and local regulations, plans, policies, and programs that provide protection and management of sensitive biological resources that are applicable to the project. Each separate section should discuss the codes that pertain to the federal, state, or government agencies that administer biological resources issues and directives.

5.0 Survey Methods

5.1 Literature and Database Review

Provide a discussion of literature reviews done before initiation of the surveys. Examples may include but are not limited to the U.S. Department of Agriculture Soil Conservation Service map for the project site, a database query of potential on-site sensitive species based on a determination of the site's physical characteristics (e.g., location, elevation, soils/substrate, and topography), documentation of CDFW California Natural Diversity Database (CNDDB)/USFWS geographic information system (GIS) records or Information for Planning and Consulting (IPaC) results for the project vicinity, and previous reports prepared for the project site. All information retrieved from databases (i.e., USFWS IPaC, CDFW CNDDB) that provide GIS-capable data should be included on the Historical Biological Resources Occurrence Map.

5.2 General Biological Surveys

Describe the methods and materials used to survey the property. At a minimum, the entire property must be walked and all biological resources must be recorded and mapped. The length of time a survey should take depends on the size of the property and the resources present. City staff may

request an additional survey if the time spent in the field does not appear to have been adequate to record all resources or the results of the survey would have been significantly affected by season, time of day, or weather conditions.

Surveys must include the entire project parcel. In rare cases where a project only affects a small portion of a large parcel, the need to survey the entire parcel may be waived. If the consultant/project proponent wishes to pursue this waiver, contact City staff in the Planning Division.

This section of the report should also include the following:

- Discuss any significant limitations to each of the surveys performed, such as timing, season, or inability to access or observe portions of the property or observe adjacent properties. All reports should acknowledge the existence of time and seasonal variations such that not all species on the site would be detected.
- Include a map of the property depicting the areas surveyed. For example, some lands may not have been surveyed because access was denied. Where directed sensitive species surveys are required, portions of the property may not provide suitable habitat/conditions for the species. A map shall be included when transects, quadrat sampling, or sample points are used.
- Numbered table listing the dates, times, and weather conditions (as applicable), as well as the biologists' names (general and focused surveys) and any applicable permit numbers for the biologists performing each survey (focused surveys).

5.3 Focused Surveys

Additional focused surveys may also be required based on season or sensitivity of species. Focused surveys must be performed by biologists with demonstrable knowledge in field detection of the subject species. Focused surveys for federally listed species must follow USFWS or CDFW protocol when such protocol exists. If no protocol has been established for the species or taxon being surveyed, then the methods of the focused survey must be described. At the very least, focused surveys should include walking transects across all areas of the property with potential habitat for the species. All point locations (or inferred territories) of these species must be included on the Biological Resources Map.

5.4 Aquatic Resources Delineation

Aquatic resources delineations will be required when a potentially jurisdictional aquatic resource is identified on project site. Aquatic resource delineations and subsequent reporting should follow current USACE standards, methods, and guidelines.

6.0 Results

6.1 Vegetation Communities and Land Cover Types

Describe each vegetation community identified on the property, addressing the following information. This section shall include a numbered table, generally formatted as shown in the example below, summarizing the acreages for all vegetation communities and land cover types. Vegetation communities and land cover types in the table and associated Oberbauer (2008) codes are provided as examples. Provide a discussion and column in the table for "impact neutral" areas that are not considered impacted but cannot be credited toward mitigation requirements, if applicable.

Table X. Vegetation Communities and Land Cover Types Acreages

Vegetation Community/Land Cover Type	Total (acres)[1]	Temporary Impacts[1] (acres)	Permanent Impacts[1] (acres)	Impact Neutral (acres)[2]
Upland				
Diegan coastal sage scrub (32500)				
Non-native grassland (42200)				
Riparian				
Coastal and valley freshwater marsh (52410)				
Developed/Disturbed				
Disturbed habitat (11300)				
Total				

Notes:

[1] An estimate of the on-site acreage, generally rounded to the nearest tenth of an acre. For wetlands and vernal pools, the acreage may be presented in square footage or hundredths/thousandths of an acre.

[2] Include a column for impact neutral acreage, if applicable.

For vegetation community and habitat type discussion paragraphs:

- List the dominant (indicator) species present
- Describe the quality of the habitat in general, including the level of previous disturbance
- Describe the species abundance, composition, and diversity in terms of vegetative structure
- Discuss the conservation value of each habitat type in terms of regional and local importance relative to other areas of similar habitat off site

6.2 Aquatic Resources

Describe any aquatic resources, including streams, drainages, wetlands, or other waterbodies, that would be modified or otherwise potentially impacted by project activities and that may be considered jurisdictional by the USACE, CDFW, or RWQCB. A discussion of the aquatic

resource, including its name/type, linear footage, acreage, its location, and a brief description, should be included in this section.

The aquatic resources jurisdictional delineation report should be included as an appendix to the report. The report should include a brief list of the dominant plant and wildlife species present as necessary per any datasheets required by resource agencies (i.e., wetland datasheet). It should describe the aquatic resource in terms of quality and condition, modifications (functions and values), vegetation communities within the bed or surrounding (bank cover), wildlife species observed using or having the potential to use the resource, and connectivity to other known jurisdictional aquatic resources or natural waterways, including major creeks and rivers or other hydrologic features located downstream. Discuss the potential stressors to the aquatic resource due to project activities.

6.3 Observed Plants

Provide a general overview of the types of plant species identified on site. For example, determine whether the majority of the plant species are native, non-native, and/or non-native and invasive. Briefly list the most dominant plant species identified. A complete list of all plant species identified on the site must be attached to the report, including the common name, scientific name, and sensitivity rating (USFWS and California Endangered Species Act threatened or endangered and California Native Plant Society [CNPS] California Rare Plant Rank).

6.4 Observed Wildlife

Format and discussion of wildlife shall follow the instructions in Section 6.3, Observed Plants.

6.5 Sensitive Species

Historical distributions of sensitive species observations in the project vicinity discovered during literature reviews, or actual observations of sensitive species made during project site surveys should be provided here in the Potential to Occur Table. Species that are either known to occur or have some potential to occur within the vicinity of the project site should then be addressed in the subsections below. The list of potentially occurring sensitive plant and wildlife species provided in this table should also have an assessment of their potential for occurrence on the project site specifically stated in a separate column (i.e., high, moderate or low potential, not expected to occur, or known to occur). Known to occur should only be applied to those species documented occurring during surveys of the project site, while high, moderate, or low potential or not expected to occur should be applied to database-derived occurrences. Scientific names, common names, sensitivity status/rating (federal, state, regional), and habitat must also be provided. Depending on the database the information was pulled from, these species may or may not be shown on the Historical Biological Resources Occurrence Map. Sensitive species listed in this table that are known to occur

based on observations made during surveys of the project site must be depicted on the Biological Resources Map.

6.5.1 Critical Habitat

Provide a discussion on the presence or absence of critical habitat in this section. Provide the locations of critical habitat on the Historical Biological Resources Occurrence Map.

6.5.2 Sensitive Plant Species Observed or with Potential to Occur

The report must address all sensitive plant species that occur or have a high potential to occur on the site or on land immediately adjacent to the site. This section should discuss the results of any directed surveys or habitat assessments.

Sensitive species are those considered sensitive by the City's Draft Subarea Plan or any state or federal agency.

The report must also contain a separate discussion for each sensitive species identified on site or that has a high potential to be present on site. For each species, provide the number, density, and location of individuals on the site (refer to Section 1.3, Biological Resources Maps, for methods of measurement). Discuss the local and regional significance of the population found on site.

When a sensitive species is identified on a property, the total number present or an estimate based on the density of individuals must be provided and the location of observed species mapped (Biological Resources Map). It may also be necessary to provide these measurements (through additional fieldwork and/or historical/available data) for adjacent areas to fully determine the true size and extent of the local population. When feasible, the actual number of individuals should be counted in the field.

When a plant species covers several acres (3 acres or more), the approximate number and the relative density may be estimated using a reasonable sampling method. Describe the method in the report. When the plant species is too small and/or numerous to count individually or individuals are not easily discernable from one another, the quadrat sampling method may be used to determine the density and cover per unit of area. These methods rely on accurate mapping and area calculation of the population. For annual plant species and geophytes (those plant species that sprout each year from underground bulbs, corms or rhizomes), in addition to accurate mapping of the current population, provide and map the "likely limits of occurrence" (LLO) on site based on suitable habitat and physical conditions. The LLO is required because the population size and location will vary from year to year. Include a reasonable justification for the limits of the LLO. The amount of mitigation will be based on the LLO.

6.5.3 Sensitive Wildlife Species Observed or with Potential to Occur

Format and discussion of sensitive wildlife species shall follow the instructions in Section 6.5.2, Sensitive Plant Species Observed or with Potential to Occur. Sensitive species are those considered sensitive by the City's Draft Subarea Plan or any state or federal agency.

When a sensitive species is identified on a property, the total number present or an estimate based on the density of individuals must be provided and the location of observed species must be mapped (Biological Resources Map). It may also be necessary to provide these measurements (through additional fieldwork and/or historical/available data) for adjacent areas to fully determine the true size and extent of the local population. When feasible, the actual number of individuals should be counted in the field.

For wildlife species, the number of individuals should be approximated based on actual sightings (and if possible, other available signs, such as fecal deposits, tracks, and nests or burrows). The method by which the number of individuals and density of a species is determined must be described in the report.

6.6 Habitat Connectivity and Wildlife Corridors

This section must also discuss wildlife corridors and linkages. Include if the corridor is identified in the General Plan-Conservation Element, a separate discussion of local wildlife corridors and regional linkages, addressing the presence or absence of both. Describe the extent of habitat connectivity between on- and off-site lands. Provide information on whether the project site is within or is part of a larger known wildlife corridor or likely serves as a minor wildlife corridor for local and regional routes of movement for wildlife, including large mammals, migratory birds, and dispersal of juveniles or others. Provide a general description of any connection that exists, including habitat types. Since indirect habitat connectivity is often very important, especially in more urbanized area, discuss the project site relative to surrounding areas that might serve as an island or "stepping-stone"/archipelago connection. When a connection exists between on- and off-site habitats, list the species that are likely to use the connection.

Describe the sites observed use as, or potential use as, a nursery site for wildlife. Discuss the use of the site by nesting birds (including rookeries) or bats (including maternal roosts). Provide a connection between unique site features previously mentioned in Section 3.0, Environmental Setting (Existing Conditions), and use by sensitive wildlife or wildlife caring for young. Foraging space for sensitive species (i.e., raptors) should be discussed in this section as well.

7.0 Project Impacts, Significance, and Mitigation Measures

This section shall summarize direct and indirect biological effects anticipated as a result of the proposed action, including but not limited to during construction activities and post-construction impacts.

7.1 Significance Guidelines/Criteria

This section should include a list of the significance guidelines or criteria provided by CEQA or the Subarea Plan. For example, CEQA Guidelines should be listed as such:

Appendix G of the CEQA Guidelines (CEQA Guidelines, Section 15000 et seq.) defines "significant effect on the environment" as a "substantial, or potentially substantial adverse change in the environment." Appendix G of the CEQA Guidelines further indicates that there may be a significant effect on biological resources if the project would:

1. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.*
2. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.*
3. *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*
4. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*
5. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*
6. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

Each of the items listed in the Significance Guidelines/Criteria section should be evaluated in the following sections of the report to provide evidence to support the determination of whether the impact is significant or not.

7.2 Impacts and Significance

7.2.1 Guidelines for the Determination of Significance: Sensitive Species

The project would have a substantial adverse effect, either directly or through habitat modifications, on one or more species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Analysis of Impacts

Using the guidelines in Section 7.2.1, Guidelines for the Determination of Significance: Sensitive Species, discuss the significance of any potential direct and/or indirect impacts identified on the site for each threshold for construction (and future operations, if applicable). For species impacts, summarize the anticipated loss of sensitive plant and wildlife populations or individuals. Provide numbers of individuals and relative percentage of the population that will be impacted for plants and, if possible, for wildlife. If a project includes futures operations, include the direct and indirect impacts to species during operation (post-construction). The report must also address whether impacts can be minimized on site. The analysis must make a conclusion, based on the significance guidelines, on whether these impacts are significant or not.

Refer to Section 6.5.2, Sensitive Plant Species Observed or with Potential to Occur, for methods to measure population size and density and, for annual plant species and geophytes, the LLO. Include summary tables of potential direct impacts to sensitive plant species, as shown in the example below.

Table X. Summary of Potential Direct Impacts to Sensitive Plant Species

Plant Species	Status (Federal/State/ CNPS/Regional)	Impacts (acres)		Impacts (individuals)	
		Permanent	Temporary	Permanent	Temporary

Mitigation Measures and Design Considerations

Provide brief descriptions of proposed mitigation measures and design considerations. For each measure, state the impact being mitigated. Some mitigation measures will require additional details, such as a Habitat Management Plan, to which more detail can be added later in the environmental review process with the agencies. For each significant impact, determine if the proposed mitigation measures have reduced the significance level to "less than significant" in accordance with the stated significance guidelines.

Significance after Mitigation

Provide a brief analysis of the level of significance after the mitigation measure is applied.

7.2.2 Guidelines for the Determination of Significance: Riparian Habitat or Sensitive Natural Community

The format of the biology reports is based on the CEQA Guidelines, which discusses riparian and sensitive habitats in a separate section from wetlands and waters (aquatic resources).

The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Analysis of Impacts

Using the guidelines in Section 7.2.2, Guidelines for the Determination of Significance: Riparian Habitat or Sensitive Natural Community, discuss the significance of all direct and indirect vegetation and habitat impacts that might occur as a result of the proposed project. This section shall include a table similar to the table in Section 6.1, Vegetation Communities and Land Cover Types. The evaluation should consider the type and density of proposed development, potential uses within the open space, and basic project design. Along with each impact, provide a determination of whether the impact is significant and whether mitigation may be applied to reduce the significance. The determination of significance should be accompanied by a brief explanation of how the conclusion was reached.

All potential impacts resulting from any part of the project must be included, even if the impacts are temporary, off site, or may not occur until a future phase of the project, such as grading. The impact analysis shall be separated according to the significance guidelines listed in Section 7.2.2.

Habitat that will potentially be removed as a result of grading or clearing associated with the project is considered impacted. For most discretionary actions, any habitat not protected within open space easements is considered impacted since few restrictions apply to prevent future clearing. Use permits and other types of actions tied directly to plot plans may, in some cases, consider impacts only to that land specifically proposed for development. In all cases, fire fuel modification and vegetation management requirements and off-site improvements are part of the project and considered direct impacts.

The analysis must make a conclusion, based on the significance guidelines, on whether these impacts are significant or not.

Mitigation Measures and Design Considerations

Format and discussion shall follow the instructions in Section 7.2.1, Guidelines for the Determination of Significance: Sensitive Species.

Significance after Mitigation

Provide a brief analysis of the level of significance after the mitigation measure is applied.

7.2.3 Guidelines for the Determination of Significance: Jurisdictional Wetlands and Waterways

The format of the biology reports is based on the CEQA Guidelines, which discusses riparian and sensitive habitats in a separate section from wetlands. Riparian habitat is discussed in Section 7.2.2, Guidelines for the Determination of Significance: Riparian Habitat or Sensitive Natural Community.

> *The project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.*

Analysis of Impacts

Using the guidelines in Section 7.2.3, Guidelines for the Determination of Significance: Jurisdictional Wetlands and Waterways, describe all impacts to federal and state wetlands and/or potentially jurisdictional waters. The report shall state whether impacts would require applications for state or federal wetland permits or RWQCB permits. The analysis must make a conclusion, based on the significance guidelines, on whether or not these impacts are significant.

Mitigation Measures and Design Considerations

Format and discussion shall follow the instructions in Section 7.2.1, Guidelines for the Determination of Significance: Sensitive Species.

Significance after Mitigation

Provide a brief analysis of the level of significance after the mitigation measure is applied.

7.2.4 Guidelines for the Determination of Significance: Wildlife Movement and Nursery Sites

> *The project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*

Analysis of Impacts

Using the guidelines in Section 7.2.4, Guidelines for the Determination of Significance: Wildlife Movement and Nursery Sites, discuss the project site in terms of existing wildlife corridors and linkages and wildlife nursery sites.

Mitigation Measures and Design Considerations

Format and discussion shall follow the instructions in Section 7.2.1, Guidelines for the Determination of Significance: Sensitive Species.

Significance after Mitigation

Provide a brief analysis of the level of significance after the mitigation measure is applied.

7.2.5 Guidelines for the Determination of Significance: Local Policies, Ordinances, and Adopted Plans

> *The project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and/or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.*

Analysis of Impacts

Using the guidelines in Section 7.2.5, Guidelines for the Determination of Significance: Local Policies, Ordinances, and Adopted Plans, discuss how the project will comply with local policies, ordinances, and plans. Guidelines that do not apply to the proposed action shall be listed with a brief explanation of why the guideline does not apply.

Mitigation Measures and Design Considerations

Format and discussion shall follow the instructions in Section 7.2.1, Guidelines for the Determination of Significance: Sensitive Species.

Significance after Mitigation

Provide a brief analysis of the level of significance after the mitigation measure is applied.

8.0 Summary of Mitigation Measures

This section shall provide a brief text summary of mitigation for project impacts. This section shall provide a mitigation table that summarizes all mitigation measures and refers to the guidelines that require each measure. Use the sample table provided below.

Table X. Summary of Mitigation Measures

Proposed Mitigation	Level of Significance after Mitigation	Guideline Addressed

9.0 References

Include a list of documents referenced in the report.

10.0 List of Preparers

Provide a list of preparers, noting each person included on the City's list of approved consultants. The principal author must be on the list or the report will not be accepted.

Technical Appendices

The table of contents shall list each document appended to the report in the order in which they are referenced in the report. The following documents must be included in the report, either in the text (if size is appropriate) or as an appendix:

A. **Figures** (unless included in the body of the report), including the Biological Resources Maps.
B. **Observed Species Lists – Plants and Wildlife**, listing all species identified on the site, including the common name, scientific name, and sensitivity ranking of each. Also note which species are non-native.
C. **Signed survey reports** for all directed or focused surveys. When applicable, include a copy of the survey results letter sent to the USFWS.
D. **Any other documents** necessary to supplement the information provided in the report.

2.3 Biological Resources Letter Report

A letter report may be adequate to document biological resources if the project site is ministerial in nature and is for small project such as a Single Family Residence andwhere the site has limited biological resources. Based on the information provided in the letter report, the City may require additional focused surveys and/or a Full Biological Resources Report.

2.3.1 Outline

The required sections of the Biological Resources Letter Report are provided in the outline below. Sections should generally follow the formatting and required contents of the sections provided in the Full Biological Resources Report outline above.

Introduction, Project Description, and Location
Environmental Setting
Survey Methods
Vegetation Communities/Land Cover Types
Aquatic Resources
Special-Status Species
Wildlife Corridors and Linkages
Significance of Project Impacts and Proposed Mitigation
References
Preparers
Attachments: Biological Resources Maps and Biological Resources Maps with Project footprint

2.3.2 Content

Although a cover page is not required for a letter report, the first page of the report shall contain the following information:

- Project name and number
- Date (original letter report date plus all revisions)
- Name of City-approved CEQA consultant preparing document, firm name (if applicable), and address
- Signature of City-approved CEQA consultant
- Project proponent's name and address
- The following statement: "Prepared for the City of San Marcos"

Introduction, Project Description, and Location

Completely describe the project, including all off-site impacts and fire fuel modification and vegetation management requirements. Provide a brief summary of the project location.

Environmental Setting

Describe the physical characteristics, such as topography, elevation, climate, water resources, and soil types. Briefly describe the general vicinity in terms of type and density of development and infrastructure. Specify public and private ownership of land in the vicinity, particularly for preserved land. Describe any preserved land adjacent to or contiguous with the site. Describe the existing land uses, including unauthorized activities, on site and on surrounding land.

Provide descriptive text for any unique habitat types and/or physical features of the land that occur on site due to soil type or topography or those habitats created by unusual circumstances. Examples of unique habitats include vernal pools or rare successional habitat communities. Unique features include any physical characteristic that might have unusual or exceptional biological value, such as cliff faces, rock outcrops, sandstone bluffs, and stream banks and bars. While unique features are often geological in nature, they can also be the result of a water resource, soil, or manufactured structures. These features are important to note and discussion of this in relation to special biological resources (e.g., cliff faces and bats) in the Results section.

Survey Methods

Describe the methods and materials used to survey the property. Provide a discussion of literature reviews done before initiation of the surveys.

Vegetation Communities/Land Cover Types

Describe each vegetation community identified on the property, addressing the following information. This section shall include a numbered table, generally formatted as shown in the example below, summarizing the acreages included for all vegetation communities and land cover types. Vegetation communities and land cover types in the table below and associated Oberbauer (2008) codes are provided as examples. Provide a discussion and column in the table for "impact neutral" areas that are not considered impacted but cannot be credited toward mitigation requirements, if applicable.

Table X. Vegetation Communities and Land Cover Types Acreages

Vegetation Community/ Land Cover Type	Total (acres)[1]	Temporary Impacts[1] (acres)	Permanent Impacts[1] (acres)	Impact Neutral (acres)[2]
Upland				
Diegan coastal sage scrub (32500)				
Non-native grassland (42200)				
Riparian				
Coastal and valley freshwater marsh (52410)				
Developed/Disturbed				
Disturbed habitat (11300)				
Total				

Notes:

[1] An estimate of the on-site acreage, generally rounded to the nearest tenth of an acre. For wetlands and vernal pools, the acreage may be presented in square footage or hundredths/thousandths of an acre.

[2] Include a column for impact neutral acreage, if applicable.

For vegetation community and habitat type discussion paragraphs:

- List the dominant (indicator) species present
- Describe the quality of the habitat in general, including the level of previous disturbance
- Describe the species abundance, composition, and diversity in terms of vegetative structure
- Discuss the conservation value of each habitat type in terms of regional and local importance relative to other areas of similar habitat off site

Aquatic Resources

Describe any aquatic resources, including streams, drainages, wetlands, or other waterbodies, that would be modified or otherwise potentially impacted by project activities and that may be considered jurisdictional by the USACE, CDFW, or RWQCB. A discussion of the aquatic resource

including, its name/type, linear footage, acreage, its location, and brief description, should be included in this section.

The aquatic resources jurisdictional delineation report should be included as an attachment to the report. The report should include a brief list of the dominant plant and wildlife species present as necessary per any datasheets required by resource agencies (i.e., wetland datasheet). It should describe the aquatic resource in terms of quality and condition, modifications (functions and values), vegetation communities within the bed or surrounding the bed (bank cover), wildlife species observed using or having the potential to use the resource, and connectivity to other known jurisdictional aquatic resources or natural waterways, including major creeks and rivers or other hydrologic features located downstream. Discuss the potential stressors to the aquatic resource due to project activities. For wetlands, describe wetland habitat quality, including disturbance, canopy cover, species diversity, and connectivity to off-site habitat, and discuss the wetland in terms of local and regional importance.

Special-Status Species

- Address all sensitive species with potential to occur on the site or on land immediately adjacent to the site.
- Discuss critical habitat on or adjacent to the site or within the region.
- Discuss large mammal use.
- Discuss migratory bird and raptor foraging and/or nesting.
- If the results of the survey include sensitive species, the City will generally require preparation of a Full Biological Resources Report. When a sensitive species is identified on a property, provide the number and density of individuals. When feasible, the actual number of individuals should be counted in the field. When a plant species covers several acres (3 acres or more), the approximate number and density may be estimated using a reasonable sampling method. Describe the method in the report. When the plant species is too small or numerous to count individually or individuals are not easily discernable from one another, the quadrat sampling method may be used to determine the density and cover per unit. These methods rely on accurate mapping and area calculation of the population. For annual plant species, in addition to accurate mapping, provide and map the LLO on site based on suitable habitat and physical conditions. This is required because the population size and location will vary from year to year. For wildlife species, the number of individuals should be approximated based on actual sightings and other available signs, such as fecal deposits, tracks, and nests or burrows. The method to determine the number of individuals and density of a species must be described in the report.
- Historical distributions of sensitive species observations in the project vicinity discovered during literature reviews or actual observations of sensitive species made

during project site surveys should be provided here in the Potential to Occur Table. Species that either are known to occur or have some potential to occur within the vicinity of the project site should be addressed in the subsections below. The list of potentially occurring sensitive plant and wildlife species provided in this table should also have an assessment of their potential for occurrence on the project site specifically stated in a separate column (i.e., high, moderate, or low potential; not expected to occur; or known to occur). Known to occur should only be applied to those species documented occurring during surveys of the project site, while high, moderate, or low potential or not expected to occur should be applied to database-derived occurrences. Scientific names, common names, sensitivity status/rating (federal, state, regional), and habitat must also be provided. Depending on the database the information was pulled from, these species may or may not be shown on the Historical Biological Resources Occurrence Map. Sensitive species listed in this table that are known to occur based on observations made during surveys of the project site must be depicted on the Biological Resources Map.

- Generally, if protocol or focused surveys are required, a Full Biological Resources Report is required. However, if protocol surveys are required with a letter report, summarize the report conclusions and attach the protocol survey report. If focused surveys (non-protocol surveys) are required, the letter report shall present the field methods and results. Focused surveys must be done by biologists with demonstrable knowledge in field detection of the subject species. Protocol surveys for federally listed species must follow USFWS protocol. Permit numbers for biologists performing these focused surveys must be provided and field notes for each survey must be attached to the report. All point locations and inferred territories of these species must be included on the Biological Resources Map. For species too numerous to map or where exact locations are not known, a notation on the map will suffice.

Wildlife Corridors and Linkages

- Wildlife corridors and linkages
- Topography/connectivity
- Other biological functions such as foraging, hill-topping, roosting, and rock outcroppings

Significance of Project Impacts and Proposed Mitigation

The letter report shall discuss all significant impacts to biological resources and propose applicable and feasible mitigation measures that would reduce impacts to a less than significant level. Include a table with habitat acreages, generally following the example below. The table shall include all habitats/vegetation communities on site, including those that are not impacted or do not require mitigation.

Habitat/ Vegetation Community	Existing (acres)[1]	Temporary Impacts (acres)[1]	Permanent Impacts (acres)	Mitigation Ratio	Mitigation Required (acres)
Total					

[1] An estimate of the on-site acreage, generally rounded to the nearest tenth of an acre. However, for wetlands and vernal pools, the acreage may be presented in square footage or hundredths/thousandths of an acre.

References

Include a list of documents referenced in the report.

Preparers

Biological Resources Letter Reports must be prepared by a City-approved consultant.

Attachments

The following documents should be included in the report, either in the text (if size is appropriate) or as an attachment:

- **Observed Species Lists – Plants and Wildlife**, listing all species identified on site, including the common name, scientific name, and the vegetation community in which the species was identified.

This page intentionally left blank.