

# Memorandum

**Date:** March 10, 2017  
**To:** Jason Goff, City of Carlsbad Senior Planner  
**From:** Rosanne Humphrey, City of Carlsbad HMP Coordinator  
**Re:** Comments on Biological Resources Technical Report (LSA 2017)

This memo provides my HMP-related comments on the Biological Resources Technical Report for the Ponto Beachfront Project (LSA 2017).

## General Comments

| Location in BTR           | Comment  |
|---------------------------|--|
| Section 2.0               | Add information about relation to HMP (not a standards area or Proposed Hardline, but inside Coastal Zone etc.)  |
| Section 2.1               | Has the city agreed to allow development on city-owned land? If so, please state that, and describe generally where it is (e.g., two disconnected strips of land, one is adjacent to the north side of Ponto Drive on the northern edge of the project area.... Etc.)  |
| Section 4.1               | (a) Please revise classification to match Oberbauer 2008. Landscape/ornamental should be included in "Disturbed Habitat" (if it was irrigated, it would be included with "Urban/Developed"); Bare Ground should be included as Disturbed Habitat; No need to call out individual trees or shrubs as a separate vegetation community; the minimum mapping unit for a small site like this should be about 0.10 to 0.25 acre (unless doing a jurisdictional delineation or vernal pools). (b) Although "Disturbed Habitat" is usually for non-vegetated areas, I'm OK with the disturbed areas that you mapped on this site, as the site is dominated by crown daisy and hottentot fig and the site has obvious signs of regular, long-term disturbance. So you'll have two veg categories: CSS and DH. Please make sure the description for Disturbed Habitat includes all of the different elements (non-native trees; bare areas; areas dominated by crown daisy with scattered coyote bushes, and areas dominated by hottentot fig.) |
| Sections 4.4, 5.3 and 5.4 | Include the designation and description of "HMP Covered Species" (see List 1, HMP page C-10) and "Narrow Endemic Species" (see MHCP Vol II, Appendix D, and List 1, HMP page C-10, and page D-90).   |
| Section 5.2               | Revise impact calculations and text according to updated mapping/classification.   |
| Section 6.0               | I recommend the following heading changes: 6.0 Mitigation and HMP Compliance. Subsection changes: 6.1 Mitigation for Habitat Impacts; 6.2 Mitigation for Impacts to Jurisdictional Resources; 6.3 Mitigation for Impacts to Sensitive Species [include "Narrow Endemic Species" and "Covered Species" in your description, and describe your mitigation for impacts to Coastal California Gnatcatcher and nesting migratory birds]; 6.4 Compliance with HMP Coastal Zone Standards; 6.5 Avoidance and Minimization Measures  |
| Section 6.1               | Revise calculations and text according to updated mapping/classification. Add more detail about mitigation (where, what, how). See comments for CZ Standard 7-2.   |

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| Table B                  | Change heading of 3 <sup>rd</sup> column to “Permanent Impacts (acres)”, and heading of third column to “Required Mitigation.” Revise table to reflect mapping/classification changes.   |
| Section 6.3              | Second paragraph – change wording to: “All projects within the Coastal Zone are required to follow the HMP Coastal Zone Standards 7-1 through 7-14 (HMP, Section D). Compliance with these standards are described below.”   |
| Page 21, CZ Standard 7-2 | This standard only includes the 67% preservation standard. Move the discussion about ratios, mitigation acreage, and location of creation into Section 6.1 and other text to appropriate CZ Standard.  |
| CZ Standard 7-8          | This standard is being met through onsite creation of coastal sage scrub at a 2:1 ratio (0.4 acres). The project was designed to minimize impacts to coastal sage scrub to maximize protection of the coastal California gnatcatcher habitat onsite (70% was preserved). [this is all you need to say; see ** note in next comment]  |
| CZ Standard 7-9          | <p>a. The no-net-loss of coastal sage scrub standard will be met through onsite creation of coastal sage scrub at a 2:1 ratio (0.04 acre). See **Note in b below.</p> <p>b. ** Note that <u>preservation</u> in the coastal zone does not count as mitigation. Onsite preservation of 0.02 acre of coastal sage scrub is excluded from the mitigation acreage.</p> <p>c. Impacts to 0.02 acres of coastal sage scrub are being mitigated at a 2:1 ratio, with creation satisfying the entire amount (0.04 acre).</p> <p>d. – e. not applicable</p> <p>f. All coastal sage scrub mitigation will occur onsite, within the Coastal Zone.</p> <p>g. Not applicable</p> <p>h. The coastal sage scrub mitigation area will be secured with a conservation easement, and the area will be managed and funded in perpetuity.</p> <p>i. Not applicable.</p>  |
| CZ Standard 7-11         | <p>a. – b. not applicable</p> <p>c. The way this is written is confusing. The purpose of the 20-ft upland buffer is to protect the onsite (preservation + creation) coastal sage scrub. <u>Please show the 20-ft buffer on the map.</u> The 20-ft buffer will consist of landscaping with native species, as recommended in Section 7-11. The paragraph then states that the adjacent 0.51-acre area will be landscaping, “currently proposed to consist of 0.51 acre of coastal sage scrub subject to an open space easement.” Is this type of landscaping the same as the 20-foot buffer? The 0.51 acre is not required for project mitigation, so I’m not sure I understand why it’s subject to an open space easement. If it’s just for aesthetic reasons (more about landscaping than habitat) please explain that. Or is this going to be saved for use by the city for future mitigation? Please clarify.</p> |
| Section 6.4              | Move this information to the section on Mitigation for Impacts to Sensitive Species  |
| Section 6.5              | Second bullet: add “to ensure.....” [explain why]. Third bullet: move this to section on Mitigation for Impacts to Sensitive Species. Fourth bullet: delete (not necessary).   |
| Section 7.0              | Delete this section. It’s redundant. You are telling this story (HMP compliance) within the other chapters. You could have a Conclusions section at the end of Section 6.0 if you want to summarize that all HMP requirements have been met.   |
|                          |  |

## Mitigation for Habitat Impacts

Mitigation ratio is appropriate. A conceptual restoration plan must be submitted prior to project approval.

## Special Species Standards

### A. HMP Covered Species

CAGN – mitigation adequate

**B. Narrow Endemic Standards**

N/A

**C. Special Species Standards**

N/A

**D. Nesting Birds**

CAGN – mitigation adequate

**Local Facilities Management Zone Standards**

Not a Standards Area

**Coastal Zone Standards**

Discussed above in General Comments

**Adjacency Standards**

Not applicable