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CITY OF SAN MARCOS
PLANNING DIVISION

October 23, 1998

Mr. Jim Uribe,
City of San Marcos,
Planning Division
1 Civic Center Drive
San Marcos, California 92069

SUBJECT: 337 EAST CARMEL STREET, BIOLOGICAL RESOURCES

Dear Mr. Uribe:

A field reconnaissance site visit to identify the habitat communities, as well as to identify the potential for occurrence of sensitive habitats and special status species of flora and fauna, was performed on September 16, 1998. Due to the disturbed nature of the site and proximal areas, field reconnaissance was conducted on foot by meandering throughout the site. Habitats observed were characterized visually with the aid of either binoculars of 10x50 power or a 10x power hand lens. Only incidental observations of wildlife species were noted. A qualitative judgment of the suitability of the habitat on the site for sensitive floral and faunal species was made.

The entire site is located within an urbanized area of the City of San Marcos and, with the exception of building footprints, has recently been "turned over". As a result of this "turning over", the site is mostly bare dirt and is virtually devoid of flora. Flora observed on the site is associated with the perimeter fence and the fringes of the urban run-off channel. The most common floral species identified on the site include the following: green bristlegrass (*Setaria viridis*), English plantain (*Plantago lanceolata*), western ragweed (*Ambrosia psilostachya*), spiny cocklebur (*Xanthium spinosum*), Bermuda grass (*Cynodon dactylon*), and wild oat (*Avena fatua*). These floral species indicate disturbed areas; therefore, the habitat on the site is best described as ruderal. Some ornamental tree and shrub species were observed along the site perimeter, but occur on the adjacent parcels. No sensitive floral species were observed, nor are expected to occur, on the site.

The only resident faunal species observed on the site were dragonflies; however, a red-tail hawk and a killdeer were observed in-flight over the site. Sight or sign of mammal, reptile, or amphibian species was not observed on the site, though habitat with some potential to support these species was observed. With the exception of insects, no fauna was observed within standing water within the urban run-off channel. No sensitive faunal species were observed, nor are expected to occur, on the site.



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Mr. Jim Uribe

Page 2

The USGS topographic map (San Marcos quadrangle, 1983) indicates the presence of an intermittent drainage, that bisects the site in the approximate location of the urban run-off channel. This is problematic because this drainage is shown to converge with San Marcos Creek and may qualify the drainage on the site as a US Army Corps of Engineers Jurisdictional Water, disturbance of which would be regulated under the federal Clean Water Act.

A review of an aerial photograph from 1990 did not indicate the presence of a natural drainage channel within this location, but did reveal the increase in urban development in the area. The site visit confirmed the presence of box culverts located approximately where the drainage channel, identified on the USGS map, entered and exited the site. It is apparent from the site visit that a back-hoe (or similar piece of heavy equipment) had been used to dig out a path for the urban run-off between these two culverts and the channel. This existing urban run-off channel on the site is not natural; furthermore, this run-off channel is sparsely vegetated and is not dominated within any portion by flora that would meet the US Army Corps of Engineers hydrophytic vegetation criterion for Jurisdictional Wetlands.

This urban run-off channel, therefore, is not a Jurisdictional Wetland. According to the current FEMA FIRM mapping (6/19/97), this site is not located within an existing 100-year floodway or floodplain. It is our understanding that this area is included within the currently permitted flood/stormwater control plan for the City of San Marcos.

If you have any questions or comments, please call me at (619) 298-7127.

Sincerely,

BRG CONSULTING, INC.

A handwritten signature in cursive script that reads "Jeffrey C. Galizio".

Jeffrey C. Galizio

Associate Environmental Analyst