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July 17, 2017

Ms. Colleen Draguesku  
Carlsbad Fish and Wildlife Office  
2177 Salk Ave., Suite 250  
Carlsbad, CA 92008

Ms. Pamela K. Kostka  
U.S. Army Corps of Engineers  
Los Angeles District  
Regulatory Division  
915 Wilshire Blvd., Suite 930  
Los Angeles, CA 90017

Ms. Victoria Chau and Mr. Andrew Valand  
California Department of Fish and Wildlife  
4665 Lampson Ave.  
Los Alamitos, CA 90720

Subject: Geologic Testing at the West Parcel, Mount San Antonio College

Dear Ms. Draguesku, Ms. Kostka, Ms. Chau, and Mr. Valand:

HELIX Environmental Planning, Inc. (HELIX) has been retained by Mount San Antonio College (Mt. SAC) to document an after-the-fact assessment of geologic testing that was undertaken for their West Parcel Solar Project (project). The area that was impacted by the geologic testing occurred within the project footprint that was analyzed and covered by the permits issued by your agencies, which include:

- 404 Nationwide Permit: File No. SPL-2015-00113-PKK
- FWS-LA-14B0243-15F0556
- Streambed Alteration Agreement Notification No. 1600-2015-0022-R5

Specifically, some brush removal occurred in the coastal California gnatcatcher habitat that was not permitted during the breeding season. This letter provides an analysis of what was done and proposed remedial actions.

## **GEOLOGIC TESTING**

On June 12, 2017, four test pits were excavated on the West Parcel at Mt. SAC to investigate a landslide area in preparation for future grading (Figure 1). The test pits were dug using an excavator.

## HABITAT IMPACTS

HELIX Senior Biologist Rob Hogenauer inspected the area impacted by the geologic testing on June 30, 2017. Mr. Hogenauer had been to the site previously as part of previous biological surveys. He mapped the footprint of the disturbance using a Trimble GeoXH global positioning system with sub-meter accuracy and took representative photographs (Attachment A).

The footprint from the geologic testing was overlaid on a vegetation map previously prepared by HELIX (Figure 1). This is the same mapping that was used in the acquisition of project permits. The vegetation affected included 0.243 acre of Venturan coastal sage scrub, 0.004 acre of mule fat scrub, and 0.019 acre of extensive agriculture (Table 1). The total impacts were just over one-quarter acre, or 0.266 acre.

**Table 1**  
**GEOLOGIC TESTING ANALYSIS**  
**VEGETATION (acre[s])**

| Habitat                     | Access Road        | Test Pits    | Spoil Piles  | Total              |
|-----------------------------|--------------------|--------------|--------------|--------------------|
| Venturan coastal sage scrub | 0.101              | 0.022        | 0.120        | 0.243              |
| Mule fat scrub              | 0.004 <sup>1</sup> | 0            | 0            | 0.004 <sup>1</sup> |
| Extensive agriculture       | 0.018              | 0            | 0.001        | 0.019              |
| <b>TOTAL</b>                | <b>0.123</b>       | <b>0.022</b> | <b>0.121</b> | <b>0.266</b>       |

<sup>1</sup> Non-wetland waters of the U.S. occur within this habitat type. The impact to waters of the U.S. is approximately 70 square feet, or 0.002 acre.

The mule fat scrub impacts were associated with a new streambed crossing. The streambed was dry at the time and has remained so since. The banks of the streambed were graded to a lower angle and some of the spoils are currently in the streambed. It appears that a small number of shrubs were affected.

## REMEDIAL ACTIONS

No activity has occurred on the West Parcel since June 12. Additional work will only occur as permitted.

Mt. SAC has initiated coastal sage scrub restoration at the expanded Wildlife Sanctuary. Due to the presence of coastal California gnatcatchers at this site, the initiation is confined to executing a contract to a qualified restoration contractor, with work scheduled to begin in September 2017. Included in this contract will be the cost of procuring container stock and seeds, as well as their installation.

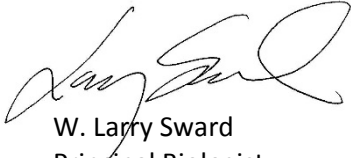
Mt. SAC proposes to remove the spoils from the streambed with manual labor (e.g., shovels and wheel barrows), and install straw wattles at the outer edge of the streambed. Jute matting, or similar, will also be installed on the disturbed banks of the streambed.

## CONCLUSIONS

Mt. SAC mistakenly authorized this work under the incorrect assumption that since the geologic testing was proposed for an area that was to be impacted by the solar project it would be allowed under the permits issued for the project. The college now knows this work was not authorized due to the timing of the work. The college is committed to working with you to avoid future problems with the development

of this site. The college is also moving forward to implement measures to ameliorate the present impacts noted above.

Sincerely,



W. Larry Sward  
Principal Biologist

**Attachments:**

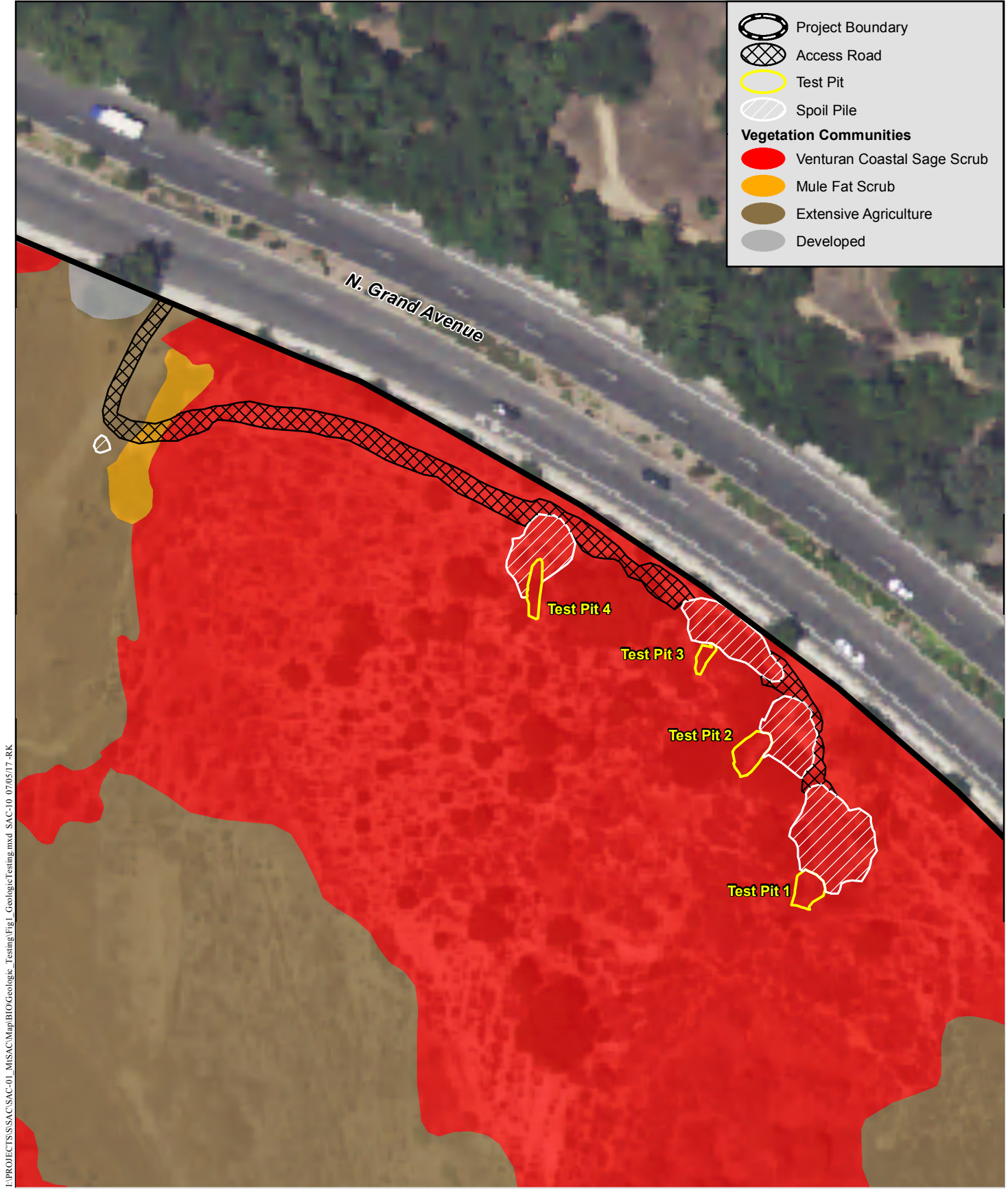
Figure 1: Geologic Testing

Attachment A: Representative Site Photos

cc: Gary Nellesen, Mt. SAC

Gary Gidcumb, Mt. SAC

Sean Absher, Stradling, Attorneys at Law



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# Geologic Testing

WEST PARCEL SOLAR PROJECT



**Streambed Crossing**

Mule fat scrub removed and minor earthwork done at this location.



Looking south across streambed.



Looking north across streambed.

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**Streambed Crossing**

Mule fat scrub removed and minor earthwork done at this location.



Looking east along north side of streambed.



Looking west along north side of streambed.

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**Test Pits**



Test Pit 1



Test Pit 2

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**Test Pits**



Test Pit 3



Test Pit 4

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