

3.3 BIOLOGICAL RESOURCES

3.3.1 Introduction

This section analyzes the potential for the proposed project to result in adverse impacts on biological resources, including special-status plants, animals, and habitats. In addition, this section discusses the potential for the proposed project to conflict with biological resources as defined by any applicable general plan, conservation plan, land use plan, or policy of the City, county, state, or other agency with jurisdiction over the project site.

Baseline conditions remain substantially similar to the setting outlined in the FEIR (pages 3.3-1 thru 3.3-16); any minor alterations in the natural environment would not affect the analysis of the revised project impacts compared to the original project.

3.3.2 Environmental Setting

The project site is contained within the United States Geological Society (USGS) 7.5-minute series topographic map for the Pasadena. The project site is located within the Central Arroyo Seco and is dominated by landscaped vegetation, but also contains areas of ruderal and ornamental vegetation, as well as numerous species of planted trees. As noted in the FEIR, a general botanical survey of the project site was performed in April 23, 2004. Table 3.3-1 in the FEIR identifies the common vegetation that was found on and around the project site. In total, sixty-one plant species were identified. A general wildlife survey was also performed on April 23, 2004 to identify wildlife species that frequent the project area. Although the project site is heavily developed and landscaped, the survey identified numerous avian, mammalian, and reptilian species. Table 3.3-2 in the FEIR identifies the thirty species viewed at the project site.

As discussed in the FEIR, the Arroyo Seco is recognized as an important wildlife corridor, connecting the San Gabriel Mountains to the Los Angeles River and the Pacific Ocean. Wildlife corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. Refer to Section 3.3-4 of the FEIR for a detailed analysis of wildlife corridors. Section 3.3-5 of the FEIR discusses sensitive biological resources that can be found within the project area. Some of these species include the white-tailed kite and the loggerhead shrike.

3.3.3 Regulatory Framework

As stated on pages 3.3-17 through 3.3-20 of the FEIR, the proposed revised project would be required to comply with all regulations set forth by the federal, state, and local regulatory agencies. On a federal level, the revised project would be required to adhere to the *Clean Water Act* as well as the *Migratory Bird Act*, and the *Federal Endangered Species Act*. Locally, the revised project would adhere to the goals and policies established by the City of Pasadena’s General Plan, including the Conservation Element as well as the

City's Tree Ordinance. For a detailed explanation of the regulatory framework associated with the revised project, refer to Section 3.3-6 of the FEIR.

3.3.4 Methodology

■ Literature Survey

Information previously obtained for the FEIR on occurrences of special-status species in the vicinity of the project site was verified from searching databases and lists of California Department of Fish and Game's (CDFG) Natural Diversity Data Base and California Native Plant Society's (CNPS) Electronic Inventory for the U. S. Geological Survey's (USGS) 7.5-minute Data were compiled for the Pasadena, Burbank, Mt. Wilson, Hollywood, Los Angeles, and El Monte USGS 7.5 Minute Quadrangles. Previously described baseline setting regarding the status of special-status plant and animal species potentially occurring within the project site was also verified from the CDFG's Special Vascular Plants, Bryophytes, and Lichens List, CDFG's List of State and Federally Listed Endangered and Threatened Animals of California, and CDFG's list of Special Animals. This search range encompasses a sufficient distance to accommodate for regional habitat diversity.

Additionally, background information on biological resources was derived from The Arroyo Seco Master Plan Final EIR (2004), the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986), the List of California Terrestrial Natural Communities Recognized by the Natural Diversity Data Base (CDFG, January 2004), and The Jepson Manual of Higher Plants of California (J.C. Hickman, Ed., 1993).

■ Field Surveys

Plant Surveys

A general botanical survey of the proposed project area was conducted on August 23, 2007, by a PBS&J biologist to verify the previously obtained focused vegetation surveys of the site and the surrounding area. The previous surveys were performed in the spring and summer of 2001 for the Arroyo Seco Master Plan EIR and described the vegetation within and adjacent to the proposed project site, as well as assessing the potential occurrence of sensitive plant species and habitats, including wetlands. The existing survey included an assessment of vegetation types, and plant communities occurring within the project site. The verification survey evaluated the current conditions of the proposed project site, and the potential of the on-site habitats to support special-status plant species identified in as having the potential to occur within the project area.

Plant species were identified in the field or collected for future identification. Plants were identified using keys in Hickman (1993), Munz (1974), and Abrams (1923). Taxonomy follows Hickman (1993) for scientific and common names. Vegetation was characterized and mapped to identify, quantify, and illustrate habitats capable of supporting special-status plant species on the site. All plant species observed on the project site remain unchanged from those listed in Table 3.3-1 of the FEIR.

The plant survey was conducted in appropriate habitat(s) at a time of year when potentially-occurring sensitive species were both evident and identifiable. Blooming periods were taken from the CNPS Electronic Inventory of Rare and Endangered Vascular Plants of California.

■ Thresholds of Significance

Significant project-related biological resource impacts as defined in the FEIR would result if the project would:

- 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 Californian Department of Fish and Game or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?
- 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?
- 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?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Increase nighttime illumination such that it would result in an adverse effect on wildlife within the area?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state conservation plan?
- Have a direct or indirect effect on the hydrology and aquatic habitat quality of the Arroyo Seco?

3.3.5 Revised Project Impacts and Mitigation Measures

As no habitat or other conservation plan exists for the project site, this effect was not found to be significant and is not analyzed within this EIR. The revised impact would not change this significance conclusion from the FEIR. There would be *no impact*.

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| Threshold | Would the revised project 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 Californian Department of Fish and Game or U.S. Fish and Wildlife Service? |
| Threshold | Would the revised project 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 US Fish and Wildlife Service? |
| Threshold | Would the revised project have a substantial adverse effect on federally protected wetlands as defined by section 404 of the <i>Clean Water Act</i> (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? |

Impact 3.3-1 **Implementation of the revised project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species, riparian habitat or other sensitive natural community, or federally protected wetlands. This is a *less-than-significant* impact.**

As stated in the FEIR, the project site is located within the Arroyo Seco, a largely developed and landscaped canyon south of the San Gabriel Mountains. While the surrounding land was found to hold a variety of animal and plant species, the area directly adjacent to the Rose Bowl stadium is highly developed, with many non-native species present. As mentioned in the FEIR, and as verified by updated literature and field surveys, no endangered, rare, threatened, or special status plant species (or associated habitats) designated by the U.S. Fish and Wildlife Service, California Department of Fish and Game, or California Native Plant Society are known to occur or found within the project site. Thus, there would be no impact to special status plant species or sensitive habitats.

As the FEIR stated, the proposed project will alter landscaped areas. The revised project plan (Options A, B, and C) would not increase the developed area and would not have an adverse effect on habitat, natural communities, or wetlands in the project area. This impact is *less than significant*.

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| Threshold | Would the revised project 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? |
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Impact 3.3-2 **Implementation of the revised project would not interfere substantially with the movement or 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. This impact is considered *less than significant*.**

As described in the Initial Study and in Section 3.3-4 above, the Arroyo Seco is recognized as an important regional wildlife corridor because it connects the San Gabriel Mountains to the Los Angeles River and Pacific Ocean. However, the central portion of the arroyo has undergone extensive

modifications to both the landscape and the channel. Native, natural plant communities and species are almost exclusively restricted to the east and west-facing side slopes of the project area, as well as the entire Central Arroyo. As such, the confinement of terrestrial natural communities to the sidewalls of the arroyo has limited the natural habitat available for animals to use for food, shelter, cover, and movement. Furthermore, the central portion of the site experiences significant daytime and nighttime recreation and illumination that would tend to inhibit wildlife movement across the developed areas. Thus, wildlife movement would be restricted to the sidewalls or the channelized portion of the stream, outside of the development footprint of the proposed project.

The proposed project would alter the landscaped areas and enlarge the developed areas directly adjacent to the bowl. These actions would not alter the Arroyo channel, or include significant amounts of fencing or other structures that would significantly reduce the movement of wildlife through or across the site from the current levels. Although the proposed project would result in increased usage and human presence of the project area, it is unlikely that the design components of the proposed project would significantly interfere with any known migratory wildlife corridors, impede the use of native wildlife nursery sites, or significantly alter the current disturbance regime. Therefore impacts to wildlife movement would be less than significant.

As the majority of the proposed project site is developed and contains ornamental vegetation; the amount of habitat for wildlife that would be affected by implementation of the proposed project is quite small. The majority of the site is landscaped and contains many highly mobile wildlife species that will be able to temporarily relocate from the relatively small area of impact to the adjoining larger areas of land. Other, less mobile individuals in the impact areas could be lost during project implementation. As the golf course water hazard is artificial in structure and hydrology, and is subject to high levels of disturbance and pollutants from the golf course, it is unlikely that wildlife would utilize these as habitat. The project impacts to non-sensitive wildlife species would be less than significant, as the loss of these species would not do the following:

- Cause a substantial reduction of the habitat of a wildlife species
- Produce a drop in a wildlife population below self-sustaining levels
- Eliminate a plant or animal community
- Cause a reduction or restriction of the number or range of a rare or endangered plant or animal
- Have a substantial affect on a rare or endangered species of animal or plant or the habitat of the species

As such, impacts to wildlife species would be *less than significant*.

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| Threshold | Would the revised project, through habitat modifications, result in a potential reduction in nesting opportunities for resident and migratory avian species of special concern, including raptors or the loss of an active avian nest? |
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Impact 3.3-3 Implementation of the revised project could, through habitat modifications, result in a potential reduction in nesting opportunities for resident and migratory avian species of special concern, including raptors or the loss of an active avian nest. Implementation of mitigation measure MM 3.3-1 would ensure that this impact remains *less than significant*.

No threatened or endangered species have been reported to occur within the plan area; however, some sensitive species such as the white-tailed kite as well as migratory avian species and other raptors such as the red tailed hawk (*Buteo jamaicensis*), which may use portions of the site and adjacent areas during breeding season, are protected under the *Migratory Bird Treaty Act*. Specific areas of concern would be those portions of the proposed project area that contain large landscaping trees or other suitable vegetation such as medium-size woody vegetation along the perimeter of the bowl area that could also be used for nesting or roosting. Additionally, project implementation and construction-related activities including, but not limited to, grading, materials laydown, facilities construction, and construction vehicle traffic may result in the disturbance of nesting and/or wintering special-status species such as the loggerhead shrike and white-tailed kite, which each have a moderate or greater probability of occurring within the proposed project area (refer to Appendix C for a full list.). The loss of a special-status species, an occupied nest, or substantial interference with roosting and foraging opportunities for migratory species of special concern or raptors as a result of construction or demolition activities would constitute a potentially significant impact. However, this impact would be reduced to a less-than-significant level through the implementation of mitigation measure MM 3.3-1.

It was noted in the FEIR that the proposed project could result in a reduction of nesting opportunities and the loss of native and/or specimen trees. The FEIR identified that up to 250 public trees would be removed under the original proposal to accommodate the new structures. The proposed revisions to the project would decrease the number of removed trees compared to the original project. If Option A is chosen, a fewer number of trees would be removed as under the original project to accommodate the support structures for the horizon-level concourse, but no trees would be removed for an east side structure. A few trees would be removed for the vertical access towers on the east side. However, on balance, fewer trees would be removed under revised project Option A than for the original project. For Option B, fewer trees would be removed even with enlargement of the tunnels because there would (a) be no east side structure and (b) no supports for a horizon-level concourse would be required.. Construction of the internal concourse would not affect any landscaped areas. The selection of Option C would result in removal of a substantially similar number of trees compared to the original project, as the widening of the tunnels would remove additional trees but there would be no east side structure constructed, which would have necessitated removal of numerous trees on the east side of the stadium, as noted, above. The revised project would include mitigation measure MM 3.3-1 identified for the FEIR, and would ensure this impact remains *less than significant*.

MM 3.3-1

To ensure that avian species of concern, protected migratory species (e.g., MBTA), or raptors species are not injured or disturbed by construction in the vicinity of nesting habitat, the project applicant shall implement the following measures:

- When feasible, all tree removal shall occur between August 30 and February 15 to avoid the breeding season of any raptor species that could be using the area, and to discourage hawks or bats from nesting/roosting in the vicinity of an upcoming construction area. This period may be modified with the authorization of the DFG; or if it is not feasible to remove trees outside this window then, prior to the beginning of mass grading, including grading for major infrastructure improvements, during the period between February 15 and August 30, all trees and potential burrowing owl habitat within 350 feet of any grading or earthmoving activity shall be surveyed for active raptor nests or burrows by a qualified biologist no more than 30 days prior to disturbance. If active raptor nests are found, and the site is within 350 feet of potential construction activity, a fence shall be erected around the tree at a distance of up to 350 feet, depending on the species, from the edge of the canopy to prevent construction disturbance and intrusions on the nest area. The appropriate buffer shall be determined by the City in consultation with CDFG.
- No construction vehicles shall be permitted within restricted areas (i.e., raptor protection zones), unless directly related to the management or protection of the legally protected species.
- In the event that a nest is abandoned, despite efforts to minimize disturbance, and if the nestlings are still alive, the developer shall contact CDFG and, subject to CDFG approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s).
- If a legally protected species nest is located in a tree designated for removal, the removal shall be deferred until after August 30th, or until the adults and young of the year are no longer dependent on the nest site as determined by a qualified biologist.

Threshold

Would the revised project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact 3.3-4

Implementation of the revised project could conflict with the City of Pasadena Tree Ordinance. This is a potentially significant impact. Implementation of mitigation measure MM 3.3-2 would reduce this impact to less than significant.

The Pasadena City Tree Protection Ordinance has been established to recognize certain native and non-native trees as significant historical, aesthetic, and ecological resources. All trees within the project boundary would be subject to the Tree Protection Ordinance, as they are considered public trees (located on property under ownership or control of the City). Some of the trees on site may also be protected as landmark, specimen, or native trees as defined in the Ordinance. Reconnaissance-level botanical surveys performed by PBS&J identified tree species including native oak trees (*Quercus agrifolia*, *Quercus berberidifolia*), western sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), and California bay laurel (*Umbellularia californica*). Other species on site that would be protected under the Ordinance include, but are not limited to pines (*Pinus* sp.) and magnolia (*Magnolia grandiflora*) trees. As noted in the discussion for Impact 3.3-3, above, implementation of the proposed project as revised would remove fewer than 250 public trees, which was the maximum identified under the original NFL proposal. However, while the revised project would remove fewer trees than the original project, this

would still be a potentially significant impact, as removal of or damage to the public trees could violate the ordinance. The project developer would be required to submit a tree replacement and relocation plan to the City for approval prior to issuance of a grading permit. Strict adherence to best management practices for construction of the proposed project and successful implementation of a comprehensive mitigation and monitoring plan, as outlined in MM 3.1-3, MM 3.3-2a, MM 3.3-2b, and MM 3.3-2c (as identified in the FEIR) would reduce potential impacts to these protected tree species to *less-than-significant* levels.

MM 3.3-2(a) *The Applicant, prior to being issued a grading permit, shall submit a tree report prepared by a certified arborist that meets the requirements of the Pasadena City Tree Ordinance identifying trees to be removed and trees to be saved. It shall also include the preparation and submission of a tree protection and replacement plan. The tree replacement plan shall include replanting for increased canopy and include a minimum replacement ratio for removed or damaged trees of 1:1. The plan shall be prepared and approved by the City prior to grading or construction and shall include the following:*

- *The details and procedures required to prepare the restoration site for planting (i.e. grading, soil preparations, soil stocking, etc.).*
- *The methods and procedures for the installation of the plant materials.*
- *Guidelines for the maintenance of the mitigation site during the establishment phase of the plantings. The maintenance program shall contain guidelines for the control of nonnative plant species and the replacement of plant species that have failed to recolonize.*
- *The revegetation plan shall provide for monitoring to evaluate the growth of the trees. Annual monitoring of the replacement trees shall occur for the first five years after which it shall be performed on the seventh and tenth year. Specific success criteria for replaced trees shall include the following:*
 - > *For a replacement ratio greater than 1:1: 90 percent or more of the transplanted/ replacement trees surviving ten years after transplantation with overall no net loss of trees*
 - > *For replacement ration of 1:1: 100 percent survival*
- *Contingency plans and appropriate remedial measures shall also be outlined in the replacement plan should the plantings fail to meet designated success criteria and planting goals.*

When construction activities occur near protected tree species that are proposed to be saved, Best Management Practices (BMPs) to avoid damage to the trees shall be implemented, and verified by the developer. The BMPs will include, but are not limited to (1) installing protective fencing prior to and during construction, using wire mesh or plastic barrier fencing placed at 2.25 times the canopy of the tree; (2) avoiding disturbance and trenching within the tree drip line; (3) maintaining the surface grade around the tree; and (4) prohibiting the placement of paving or landscaping requiring summer irrigation in the vicinity of trees.

MM 3.3-2(b) *A drainage plan shall be designed in such a way as to avoid changes to hydrology in the vicinity of the protected trees.*

MM 3.3-2(c) *Construction staging areas shall be designated on the construction plans and parking, loading, and grading during all construction activities prohibited within the root zone of the protected trees.*

MM 3.1-3 also applies to this impact.

Mitigation measures MM 3.1-3 and MM 3.3-2(a) thru MM 3.3-2(c) would reduce potential impacts to these protected trees on the project site to *less than significant*.

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| Threshold | Would the revised project increase nighttime illumination such that it would result in an adverse effect on wildlife within the area? |
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Impact 3.3-5 **The revised project would increase nighttime illumination, but no adverse effect on wildlife within the area would occur. Implementation of mitigation measure MM 3.3-3 would ensure that this impact remains *less than significant*.**

The revised project does not include any alterations to the lighting system different from that proposed under the original project. Therefore, the revised project would not create new potentially threatening impacts to the nighttime wildlife within the area than previously identified in the FEIR. As was stated in Section 3.3-5 of the FEIR, and as verified by recent literature and field surveys, there are no endangered, rare, threatened, or special-status plant species within the project site. Therefore, none of the newly proposed modifications would have a different impact from those previously analyzed.

Implementation of mitigation measure MM 3.3-3, which required that all lighting be directed away from natural areas, would ensure that this impact remains *less than significant*.

MM 3.3-3 *All lighting along the perimeter of natural areas such as the channel shall be downcast luminaries with light patterns directed away from natural areas, as coordinated with a certified lighting engineer and project biologist.*

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| Threshold | Would the revised project have a direct or indirect effect on the hydrology and aquatic habitat quality of the Arroyo Seco? |
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Impact 3.3-6 **The revised project could have direct and indirect effects upon the hydrology and aquatic habitat quality of the Arroyo Seco. This impact is considered *less than significant*.**

The proposed project does not propose to directly modify the channel; however, construction and operation of the proposed project, including dewatering of the water hazard, could have indirect effects upon the hydrology and aquatic habitat quality of the channel which is considered a jurisdictional water (e.g., “other waters”) of the United States and therefore subject to regulation under Section 404 and Section 401 of the *Clean Water Act* (33 CFR Part 238).

Grading and excavation activities have the potential to increase erosion and subsequent deposition of soil particles into the channel. Additionally, surface water runoff containing excess fertilizers or other chemicals could alter the aquatic community or the water quality of the Arroyo Seco by altering the nutrient regime. Toxics contained in herbicides, insecticides, and fungicides used to maintain landscaping could also result in direct kill of aquatic and riparian plants and animals within the channel.

Runoff produced during and after construction is subject to National Pollution Discharge Elimination System Regulations, as well as local water quality and runoff standards. Therefore, the Applicant will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall require, among other Best Management Practices (BMPs), that stormwater runoff be prevented from flowing over unprotected slopes and that silt fencing shall be trenched in 100 feet from the outer limits of riparian vegetation and left in place during construction. Disturbed areas shall be stabilized as quickly as possible, using biotechnical techniques.

California Stormwater Best Management Practices (BMPs) for Construction Activity, as prepared by the California State Stormwater Quality Task Force, will also need to be incorporated into the construction plans. BMPs for Municipal Activities would be incorporated into a long-term site management program which, when implemented, BMPs would reduce operation-related impacts from sedimentation and contaminant loading to an insignificant level.

Implementation of NPDES and County BMPs and compliance with state and federal clean water regulations would ensure that the impacts of construction and operation of the revised project would be *less than significant*.

3.3.6 Cumulative Impacts

A cumulative impact analysis is only provided for those biological impacts that result in a less-than-significant or significant and unavoidable impact. A cumulative impact analysis is not provided for those impacts where there are no project-related impacts. The geographic context for the discussion of cumulative impacts depends on impact being discussed.

The geographic context for cumulative impacts to plants, wildlife, and vegetation communities in the region (San Rafael Hills, Verdugo Mountains, and San Gabriel Mountains), as this area serves as similar habitat, and contains many of the same species, who have adapted to the regional environmental setting. The primary effects of the proposed project, when considered with other future/related projects in the region (including build-out of these cities' general plans and ,the cumulative projects list included in Chapter 2 [Description of the Revised Project]of this Draft SEIR) would be the cumulative direct loss of natural communities (and in turn, wildlife habitat), and movement corridors. Specifically, past, present, and probable future/related projects in the region are anticipated to permanently remove plant and wildlife resources within development areas. As impacts from the proposed project would be limited to primarily ornamental and landscaped vegetation, the cumulative loss of these non-native habitats is not a significant concern from an ecological standpoint. These areas are composed of primarily non-native vegetation that offer little if any habitat value or resources for native species. Although the continued cumulative effect of the loss of native plant and wildlife habitat in the region is expected to be an adverse impact, the projects contribution to this would be *less-than-significant* for reasons discussed above.

The geographic context for cumulative impacts to wetlands/wetland species is Arroyo Seco and its vicinity (watershed) and tributaries, as this is the wetland area that could possibly be impacted by the proposed project and future/related projects. Development in the vicinity of the Arroyo Seco, and the implementation of the Arroyo Seco Master Plan, would increase the potential for impacts on tributaries

to the Arroyo Seco, as well as the Arroyo Seco itself. These additional cumulative projects could result in changes to water quality from urban runoff, potentially containing petroleum residues, and runoff of nutrients from residential or landscaped areas. These cumulative effects, if uncontrolled, will ultimately begin to affect the Arroyo Seco. The Arroyo Seco is known to support diverse riparian communities and several special status species, including the Federally Endangered Arroyo toad in the northern portion. These cumulative impacts are considered significant because they have the potential to substantially reduce the biological value of the Arroyo Seco if urban pollutants are excessive. Implementation of a SWPPP and use of California Stormwater Best Management Practices during and after construction of the project would help reduce these cumulative impacts to less-than-significant levels. Although the continued cumulative effect of development in the vicinity of the project and its tributaries could cause an adverse impact, the projects contribution to this would be *less-than-significant* for reasons discussed above.

The geographic context for cumulative impacts to local or regional policies relating to biological resources depends on the policy, and the area it governs. All future/related projects within the City or region will be held to the same policies as the project, and are expected to abide by these policies. If it is found that a project is not in conformance with a policy, mitigation (such as MM 3-3.2(a-c), above) would be put in to place. The continued cumulative effect of development in the City/region of the project is not expected to cause an adverse impact, and the projects contribution to this would be *less-than-significant* for reasons discussed above.

3.3.7 Conclusion

The biological resources impact of the proposed project revision would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts. The revised project does continue to create the potential for an adverse biological impact, but through the guidelines set forth in mitigation measures MM 3.3-1 to MM 3.3-3, the resulting impacts would be reduced to less than significant.