

May 27, 2018

Howard Cooper Development Manager Harper Communities Inc. 8110 El Paseo Grande Ste 105 San Diego, CA 92037

RE: MUP 10-037 CHANGES TO PROJECT SITE PLAN - CHINESE BIBLE CHURCH OF SAN DIEGO

Howard,

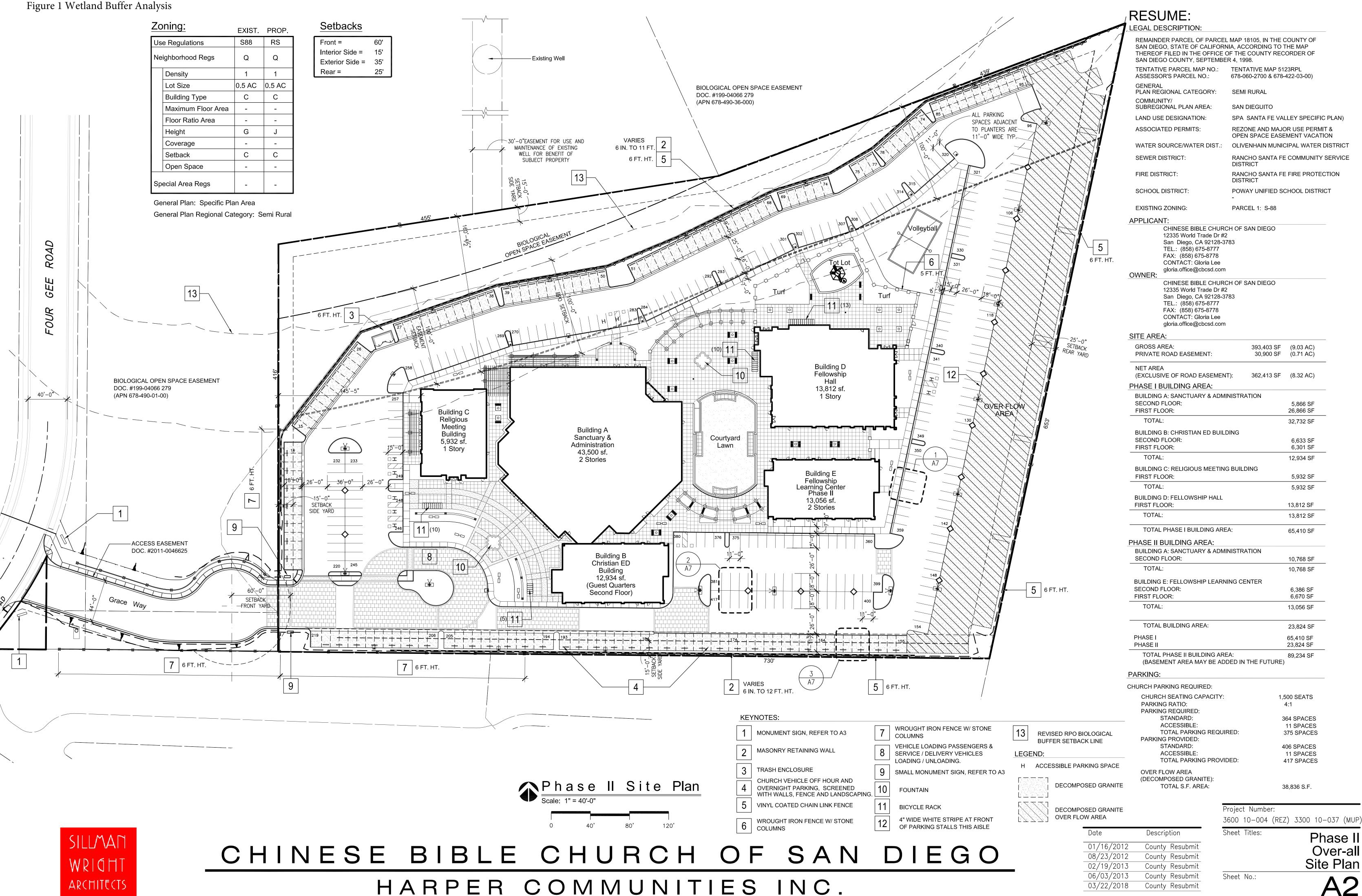
I have analyzed the new project site plan and its potential indirect impact to the the wetland habitat (emergent wetland Holland Code 52440) that occurs along the northern portion of the Chinese Bible Church project site (Figure 1). The new site plan has reduced impacts along the northern portion of the property and is now in compliance with the County of San Diego's Resource Protection Ordinance (RPO) wetland buffer requirements (50-foot buffer) (Figure 2). These changes directly address comments (4S SFC MPAC: 7, 13 and 42; Coast Law Group: 19-24 and 27; Anders: 34) raised during public review of the project. The new site plan ultimately reduces project impacts and will ensure indirect impacts do no occur to the emergent wetland habitat that occurs in the existing open space easement along the northern portion of the project.

If you have any questions regarding this letter or my analysis please feel free to call me at (760)-492-3342

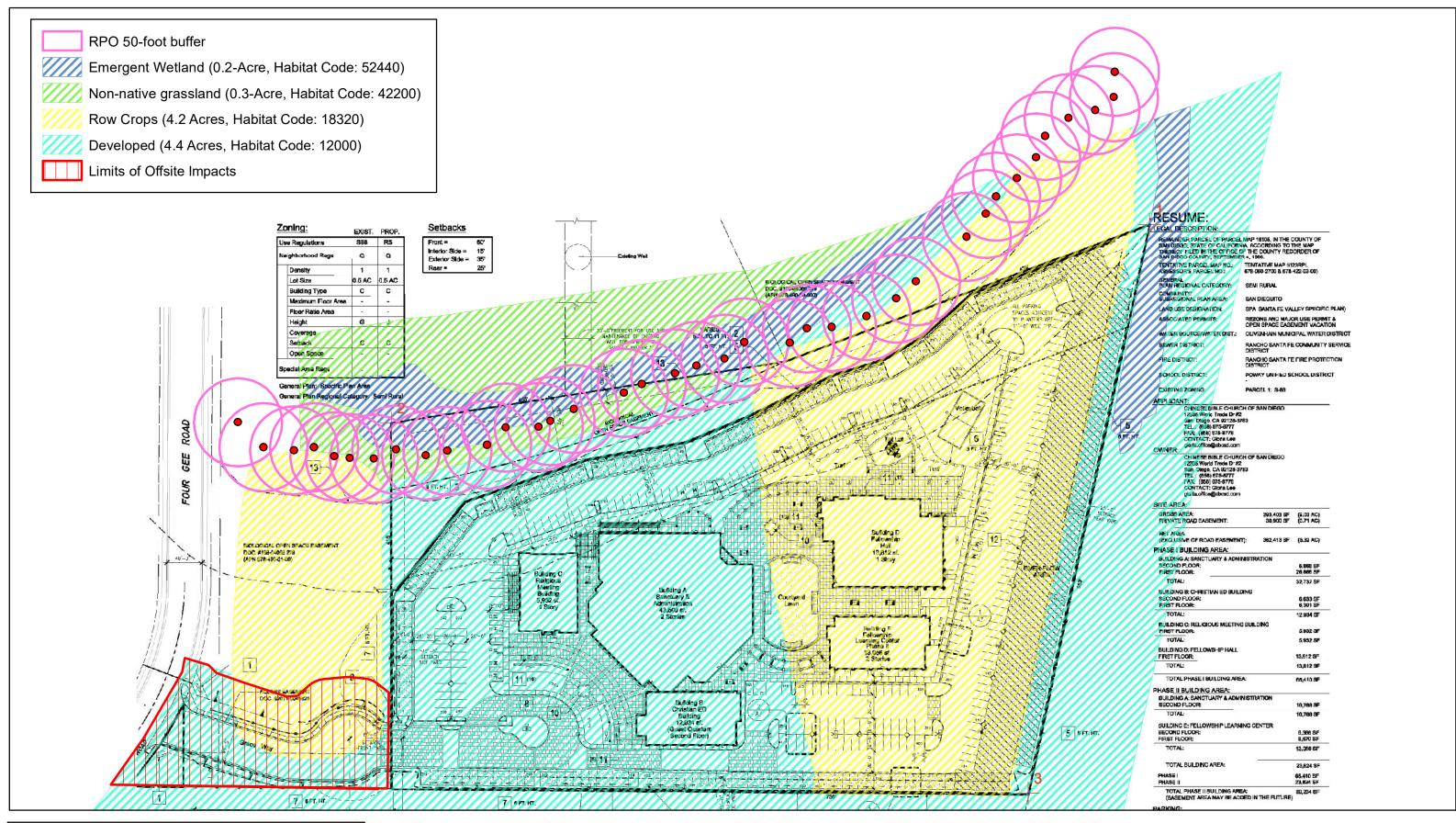
Korey Klutz

Principal Biologist

Honey Hotel



County Resubmit





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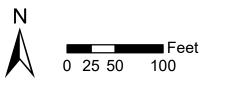


Figure 2 Biological Resources RPO Buffer Analysis



December 19, 2016

Howard Cooper Development Manager Harper Communities Inc. 8110 El Paseo Grande Ste 105 San Diego, CA 92037

RE: MUP 10-037 CHANGES TO PROJECT DESCRIPTION

Howard,

The changes in the project description, i.e. no preschool and the addition of solar power, will have no impact on the biological letter report analysis. The changes will not impact any new sensitive biological resources that would require additional mitigation.

Korey Klutz

Principal Biologist

Francy Hlate

Ron Harper Harper Communities, Inc. 8110 El Paseo Grande, Suite 105 San Diego, CA 92037

July 17, 2016

RE: Biological Letter Report for Chinese Bible Church of San Diego, REZ 3600 10-004, MUP 3300 10-037; Kiva Project No. 09-0117132, Project Address: 16919 Four Gee Road, APN: 678-060-27-00

The following report represents the Biological Letter Report for the Chinese Bible Church of San Diego located at 16919 Four Gee Road, APN 678-060-27-00.

SUMMARY

The proposed project is religious assembly located within the Community of San Dieguito within unincorporated San Diego County. The project is located within the Santa Fe Valley Specific Plan. The project is located within a Take Authorized Area of the Multiple Species Conservation Plan (MSCP). The entire site has been graded in the past. The site is composed of residentially developed and agricultural lands with the exception of a small area of open space in the northwestern corner.

Habitats occurring within the project include emergent wetland, non-native grassland, row crops and developed land. Habitats that will be impacted as part of offsite impacts for construction of the access road include non-native grasslands and developed land. One sensitive wildlife species was observed onsite, the white-tailed kite.

No impacts will occur to the emergent wetland that is encompassed in the existing onsite open space easement. Impacts to non-native grassland off-site will be mitigated in conformance with the MSCP. Project impacts will be mitigated to below a level of significance, so that no significant direct, indirect or cumulative impacts will occur as a result of the project.

INTRODUCTION, PROJECT DESCRIPTION, LOCATION, AND SETTING

Project Description

The proposed project is a religious assembly in the Santa Fe Valley Specific Plan on a 9.09 gross acre site (8.42 acres net.) The project will include a sanctuary and administrative building as well as several church related buildings. Access to the project will be from Four Gee Road via a driveway called Grace Way. Construction of Grace Way will result in offsite impacts and will require an open space easement vacation. Sewer will be provided by the Rancho Santa Fe Community Services District. Water will be provided by the Olivenhain Municipal Water District. The site contains an existing open space easement in the northwest corner.

Project Location

The proposed project is located within the Community of San Dieguito within unincorporated San Diego County (Figure 1). The project is located within the Santa Fe Valley Specific Plan. The project is located at 16919 Four Gee Road (Figure 2). The project is located within a Take Authorized Area of the Multiple Species Conservation Plan (MSCP).

Project Setting

The entire site has been graded in the past. The site is composed of residentially developed and agricultural lands with the exception of a small area of open space in the northwestern corner. The site has residential development to the south and east, a fire station to the west and the San Dieguito River to the north (Figure 3).

The project site is shown on the Escondido USGS 7.5' Quadrangle. It is in Township 13 south, Range 2 West (Figure 4). The project is a small knoll and gentle slopes. The onsite elevations range from approximately 493 feet above mean sea level to 511 feet above mean sea level.

The soils on the property consist of Diablo Clay, 2 to 9% slopes and Olivenhain Cobbly Loam, 2 to 9% slopes (Bowman 1973). The Diablo Series consists of well-drained, moderately deep to deep clays derived from soft, calcareous sandstone and shale. The Olivenhain series consist of well-drained, moderately deep to deep cobbly loams that have a very cobbly clay subsoil.

Site Survey

The site was surveyed by Robin Church on January 12, 2012 from 1:10 to 2:45 P.M. The weather consisted of few high clouds, a light breeze and a temperature of approximately 68 degrees Fahrenheit.

The site was also revisited on March 31, 2014. The weather included scattered clouds, a breeze of approximately 10 miles per hour and a temperature of approximately 66 degrees Fahrenheit.

Mapping was performed following the Biological Resource Mapping Guidelines within the Report Format and Content Requirements: Biological Resources (County 2010).

Wildlife was identified directly by sight or by vocalizations, and indirectly by scat, tracks, or burrows. Field notes were maintained throughout the survey. The primary focus of the survey was to document and map the size, location, and general quality of all habitat types and the presence or potential presence of any sensitive resources (plant or wildlife) onsite.

Nomenclature for this report conforms to Hickman (1993), for plants, Holland (1986) and Oberbauer (1996) for plant communities and habitat types, American Ornithological Union (AOU 1998 and 2000) for birds, Jennings (1983) and Stebbins (2003) for reptiles and amphibians, Jones (1992) for mammals, and Powell (1979) for insects.

Biological Resources Present

The site contains emergent wetland, non-native grassland, row crops and developed land associated with the current use of the site.

REGIONAL CONTEXT

The project is located within a Take Authorized Area of the Lake Hodges Segment of the MSCP. The northwestern corner of the parcel contains an open space easement over a portion of the San Dieguito River as part of the approval process for TM 5123 and TPM 20340. The parcel to the north and west are biological open space, which were also a result of the approval process for TM 5123 and TPM 20340. As can be seen in Figure 3, dense residential development occurs to the east upstream and to the north of the open space lot. The San Dieguito River ends approximately 400 feet to the northeast resulting in the eastern terminus of this branch of the river. To the west is a fire station and to the south is dense residential development.

HABITATS AND VEGETATION COMMUNITIES

The following is a summary of the existing habitats and vegetation communities on the site. This section includes information on the habitat types, the dominant species present, and the habitat quality. Species abundance, composition, and diversity are discussed in terms of vegetative structure and wildlife, as well as the habitat sensitivity level and regional and local importance of conserving each habitat type.

Habitats

Habitats were classified and mapped based on Terrestrial Vegetation Communities in San Diego County based in Holland's Descriptions (Oberbauer 1996). The best-fit definition based on the dominant plant species and County's current description is provided. Habitats occurring within the project include emergent wetland, non-native grassland, row crops and developed land. Habitats that will be impacted as part of the offsite impacts from the construction of Grace Way include row crops and developed land. The row crop habitat in the offsite area was converted to agriculture without authorization. As

a result, this analysis considers that the impacts are to non-native grasslands, which appear to be the habitat that was present prior to conversion.

Emergent Wetland (Habitat Code: 52440)

The emergent wetland occurs in two locations within the study area including north of the existing residence and immediately adjacent to the eastern site boundary. The northern emergent wetland habitat is a narrow band located along the northwestern corner of the property and is associated with the San Dieguito River (see photograph one). This habitat is dominated by bulrush (*Scirpus* sp.) and cat-tails (*Typha latifolia*). Additionally, there is an occasional arroyo willow (*Salix lasiolepsis*). Non-native species such as sago palms occur along the edge. A white-tailed kite (*Elanus caeruleus*) was observed roosting in one of the willows. This habitat has high value.

The emergent wetland habitat located offsite and east of the site boundary is comprised primarily of cat-tails and several small arroyo willow saplings. This habitat is manmade and is fed from a storm drain that direct flows from the adjacent residential development. A review of historical aerial photographs concluded that this emergent wetland habitat was likely non-native grassland habitat prior to the construction of the adjacent residential neighborhood (see photographs two and three). This habitat is not connected or associated with the San Dieguito River.

Photograph One - emergent wetland habitat located within the northern portion of the

study area



<u>Photograph Two - 2003 aerial photograph taken prior to the development of the adjacent residential development.</u>



Photograph Three - 2016 aerial photograph showing emergent wetland habitat located along the eastern site boundary.



Non-Native Grassland (Habitat Code: 42200)

The non-native grassland onsite is broad-leaf dominated. It occurs within the open space easement between the emergent wetland and the fence that delineates the easement boundary. Plants observed include bristly ox-tongue (*Picris echiodes*), wild radish (*Raphanus sativus*), goosefoot (*Chenopodium multifidum*), and cheeseweed (*Malva parviflora*). Wildlife observed within this habitat includes white-crowned sparrow (*Zonotrichia leucophrys*) and coyote (*Canis latrans*) scat. This habitat has low value.

Row Crops (Habitat Code: 18320)

The site has regularly been used as an organic farm for the production of strawberries. The fields are currently fallow. Many white-crowned sparrows (*Zonotrichia leucophrys*) were observed in this habitat. This habitat has low value.

Developed Habitat (Habitat Code: 12000)

The developed habitat onsite is associated with the residences and landscaped areas onsite. The landscaped area has several large trees including pines and eucalyptus. This habitat has low value.

Special Status Species

Following is a summary of all sensitive species with potential to occur on the site or on land immediately adjacent to the project area. Sensitive or special status plant and wildlife species and habitats are those that are considered rare, threatened, or endangered within the state or region by local, state, or federal resource conservation agencies. Sensitive species are so called because of their limited distribution, restricted habitat requirements, particular susceptibility to human disturbance, degradation due to development or invasion by non-native species, or a combination of all of these factors.

The following were used in the determination of sensitive biological resources: U.S. Fish and Wildlife Service (USFWS) (2007, 2010); California Department of Fish and Game (CDFG) (2009, 2010a, 2010b, 2010c), County Sensitive Plant and Animal list (County 2010), California Native Plant Society (CNPS) online inventory (2011), and the California Natural Diversity Database (CNDDB 2012).

Sensitive Plants

Sensitive or special status plant species are those that are considered rare, threatened, or endangered within the state or region by local, state, or federal resource conservation agencies. Sensitive plant species are so called because of their limited distribution, restricted habitat requirements, or particular susceptibility to human disturbance, or a combination of these factors.

Sensitive plants known to occur in the region encompassing the project were identified using the CNDDB and CNPS databases for plants associated with meadows, seeps, marshes and swamps. Four sensitive plant species are known to occur within the region. One species would have been observable and was not detected. The remaining three species are associated with alkaline habitats that do not occur onsite and have a low potential to occur. No sensitive plant species were detected onsite. Sensitive plant species with the potential to occur onsite are discussed in Appendix C.

Sensitive Wildlife

Sensitive or special interest wildlife species and habitats are those that are considered rare, threatened, or endangered within the state or region by local, state, or federal resource conservation agencies. Sensitive species are so called because of their limited distribution, restricted habitat requirements, or particular susceptibility to human disturbance, or a combination of these factors

One sensitive wildlife species was observed within the emergent wetland onsite, the white-tailed kite.

White-tailed [Black-shouldered] Kite (*Elanus caeruleus*)

Status: California Species of Concern, County Group 1

The white-tailed kite is fully protected by California Department of Fish and Wildlife. It is a yearlong resident in coastal and valley lowlands, preferring riparian woodland, oak groves, or sycamore groves adjacent to grasslands (Unitt 2004). They inhabit herbaceous and open stages of most habitats in cismontane California. The species forages in open grasslands, meadows, farmlands, wetlands, and freeway center divides. They glide and hover less than 100 feet above the ground in search of prey. The white-tailed kite nests in tops of tall trees, including non-native trees such as orange trees.

Additional Sensitive Wildlife with Potential to Occur

Twelve sensitive wildlife species have the potential to occur onsite (Appendix D). Of these, one species, the Cooper's hawk (Accipiter cooperi), has a moderate potential to occur. This species is discussed below. The site has a long history of development and agricultural use, is more or less surrounded by development resulting in a low potential for use by sensitive species.

Cooper's Hawk (Accipiter cooperi)

Status: California Species of Concern when nesting, County Group 1

The Cooper's hawk when nesting is listed as a California Special Concern species by California Department of Fish and Wildlife. This species is a year-long resident in southern California. It is most likely to occur in areas with dense stands of live oak, riparian, deciduous, or other forest habitats near water. However, it is also known to nest in urban areas with large trees.

Status Onsite: Moderate Potential to nest within the ornamental trees onsite however no nests were observed.

Jurisdictional Wetlands and Waterways

Jurisdictional wetlands occur both onsite and immediately adjacent to the project site. The onsite wetlands occur within an existing open space easement north of the residence and the offsite wetland habitat occurs just east of the site boundary (Figure 3 see emergent wetland boundary limits for both the northern and eastern wetland locations). The limits of jurisdiction would be the same as the emergent wetland boundaries mapped and these areas would qualify as Army Corps of Engineers, California Department of Fish and Wildlife, Regional Water Quality Control Board jurisdiction. It should be noted that much of the understory of the northern emergent wetland area had been impacted by the original use of the site when the building was constructed.

The application of a Resource Protection Ordinance wetland status is triggered by a discretionary action (RPO, Section 86.603). Since the northern emergent wetland habitat onsite is already conserved in open space as a result of a previous discretionary action (TPM 20340, approved on 9/4/98) and is not part of the current discretionary action, there is no trigger to further identify RPO wetlands or wetland buffers. Therefore, no additional wetland delineation or buffer establishment is needed for the emergent wetland area within the northern portion of the project site. A masonry retaining wall and vinyl coated chain link fence are design features of the project. This wall and fence and the related drainage plan will divert hardscape runoff from the wetland, and prevent encroachment by humans and domestic animals into the riparian open space. The project plans also include an approximately 16 to 40-foot buffer between the retaining wall/fence and the existing open space easement.

The emergent wetland habitat located along the eastern site boundary (offsite) is not considered an RPO wetland because it is a manmade feature that meets the conditions specified in Section 86.602 (q)(2)(aa) of the RPO. As detailed previously this habitat type is fed by storm drain runoff from the adjacent residential development. Prior to the construction of the adjacent neighborhood and the storm drain the habitat in this area was likely comprised of non-native grasslands (see photographs two and three). Furthermore, this habitat has negligible biological function because the vegetation is routinely maintained, is relatively small in size (width of the habitat area is approximately 5-15 feet and the total feature is approximately 13,000 square feet) and isolated/not connected to the wetland habitat that occurs within the northern portion of the property. In addition, the offsite emergent wetland is not a vernal pool and does not support any wetland dependent sensitive species.

Other Unique Features/Resources

Wildlife Corridors and Linkages

As can be seen in Figure 3, dense residential development occurs to the east upstream and to the north of the open space lot. The San Dieguito River ends approximately 400 feet to the northeast resulting in the eastern terminus of this branch of the river. Dense

residential development also occurs to the south. No evidence of large mammal use was found on the site. Due to the narrow width of the San Dieguito River and adjacent development, the project site is not anticipated to serve as a wildlife corridor for large mammals.

Raptor Nesting

The site contains mature trees that can support raptor nesting. Raptors are large predatory or scavenger birds that typically require tall trees for perching and nesting associated with adjacent open grasslands to forage. Due to declining habitat and the associated declining numbers of these species on the whole, many raptor species have been designated as California Species of Special Concern by the CDFW. These species are protected, especially during their critical nesting and wintering stages. Raptors are protected under the CDFW California Raptor Protection Act (Title 14, Section 670). No nests were observed onsite.

Significance of Project Impacts and Proposed Mitigation

For the purposes of this impact analysis, the entire site outside of the existing open space easement is assumed to be impacted. Additional off-site impacts will occur as a result of the construction of Grace Way. Impacts are shown in Table 1. No impacts will occur to sensitive Emergent Wetland habitat. As a result, no mitigation for Emergent Wetland is required. Pursuant to the County Report Format and Content Requirements – Biological Resources, impacts to offsite Non-native Grassland resulting from the construction of Grace Way will be mitigated at a 1:1 ratio, since this area is located within a dedicated biological open space easement that is proposed to be vacated. The mitigation ratio would be 1:1 instead of the typical 0.5: 1 in order to mitigate for the loss of the originally preserved habitat as well as the current loss of habitat (County 2010). Non-native grasslands mitigation (0.3-acre) will be acquired at the Crestridge Mitigation Bank in Lakeside, California.

Table 1. Habitat Impacts and Mitigation

Habitat/Vegetation Community	Existing (acres)	Onsite Impacts (acres)	Offsite Impacts	Mitigation Ratio	Mitigation Required (acres)
Emergent Wetland (Habitat Code: 52440)	0.2	0	0	3:1	0
Non-native Grassland (Habitat Code: 42200)	0.3	0	0.3	1:1*	0.3
Row Crops (Habitat Code: 18320)	4.2	4.2	0	NA	NA
Developed Habitat (Habitat Code: 12000)	4.7	4.4	0.3	NA	NA
Total	9.4	8.6	0.6		0.3

* Normally mitigation for non-native grassland is at a ratio of 0.5:1. A 1:1 mitigation ratio will be applied for impacts to the offsite non-native grassland due to the construction of Grace Way since this area is located within a dedicated open space easement. Pursuant to the County Report Format and Content Requirements – Biological Resources, if existing dedicated biological open space easements are being vacated, the loss of preserved habitat should be mitigated at twice the required ratios because the original mitigation must be replaced and the current loss of habitat must be mitigated (County 2010).

Impacts to Special Status Species

Based upon the County Guidelines for Determining Significance – Biological Resources (2010), a significant impact to special status species would occur if:

- The project would impact one or more individuals of a species listed as federally or state endangered or threatened.
- The project would impact an on-site population of a County List A or B plant species, a County Group I animal species, or a species listed as a state Species of Concern.
- The project would impact the regional long-term survival of a County List C or D plant species or a County Group II animal species.
- The project would impact arroyo toad aestivation, breeding, or foraging habitat.
- The project would impact golden eagle habitat.
- The project would result in a loss of functional foraging habitat for raptors.
- The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to Project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or an area that supports multiple wildlife species.
- The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term, including: increasing human access; increasing predation or competition from domestic animals, pests or exotic species; altering natural drainage; and increasing noise and/or nighttime lighting to a level above ambient that has been shown to adversely affect sensitive species.
- The project would impact occupied burrowing owl habitat.
- The project would impact occupied cactus wren habitat, or formerly occupied cactus wren habitat that has been burned by wildfire.

- The project would impact occupied Hermes copper habitat.
- The project would impact nesting success of sensitive animals through grading, clearing, modification, and/or noise generating activities such as construction.

The following analysis considers each of the special status species guideline points, item by item.

Federally or State Endangered or Threatened Species

No federally or state endangered or threatened species were identified on the project site. Thus the project will have no impact on any federally or state endangered or threatened species.

County List A or B Plant Species/County Group I Animal Species/State Species of Concern

One sensitive wildlife species, white-tailed kite (a County Group I animal species), was observed within the open space onsite. This biological open space area would be retained and no impacts to the emergent wetland within which the species was observed would occur. Due to the existing developed and agricultural uses onsite, impacts to sensitive wildlife species with the potential to occur onsite are not anticipated to be significant due to previous disturbance and lack of suitable habitat. No impacts to County List A or B plant species are anticipated since no sensitive plant species were detected onsite.

County List C or D Plant Species/County Group II Animal Species

No County List C or D plant species or County Group II animal species were detected on-site. Therefore, the proposed project is not anticipated to result in impacts to any of these special status plant or animal species.

Arroyo Toad Aestivation, Breeding or Foraging Habitat

The project site does not support appropriate aestivation, breeding or foraging habitat for the arroyo toad. The arroyo toad prefers sandy or cobbly washes with swift currents and associated upland and riparian habitat. The project site does not support this type of habitat. Therefore no impact is identified for this subthreshold.

Golden Eagle Habitat

No golden eagles have been recorded in the project area and no nesting sites are known within 4000 feet of the project site; therefore, the proposed project is not expected to result in impacts to habitat actively utilized by golden eagles.

Wildlife Corridor

Dense residential development occurs to the east north, and south of the project site. The San Dieguito River ends approximately 400 feet to the northeast resulting in the eastern terminus of this branch of the river. No evidence of large mammal use was found on the site. Due to the narrow width of the San Dieguito River within the project vicinity and adjacent development, the project site is not suitable as a wildlife corridor for large mammals. Therefore, impacts to wildlife corridors would be less than significant.

Indirect Effects

Implementation of the proposed project would increase human access in the area and create conditions suitable for exotic plant species intrusion. Design measures include a retaining wall and fence separating the developed area from existing open space easement areas. This would serve as a barrier for increased human access and exotic plant species intrusion within the open space areas. Predation from domestic animals is not an issue since residential uses that could result in the introduction of domestic pets are not proposed. Good housekeeping such as the proposed secure garbage area in the project design will minimize nuisance animals such as crows that could affect raptor usage of the open space.

Altering drainage

The project would not alter the drainage patterns either onsite or offsite. The onsite and offsite emergent wetland habitat will not be directly impacted by the project. All existing waterways and drainage patterns would continue to function in the same manner as the pre-project condition.

Noise/Nighttime Lighting Increases

The project will introduce additional nighttime lighting and noise to the project site due to the proposed uses on the site. However, the project has been designed with the parking area adjacent to the open space that will serve as a buffer between the buildings and open space area. A vine-covered fence is proposed to shield headlights from vehicles accessing the parking. The lighting plan for the project indicates that lighting within the project adjacent to conserved habitat will be selectively placed, shielded, and directed onsite, away from all habitat to avoid a significant impact to the open space area. As a result, impacts from lighting would not be significant. Additionally, due to the transient nature of the noise generated by use of the parking lot, noise impacts are anticipated to be less than significant. In summary, impacts related to noise and nighttime lighting are less than significant.

Burrowing Owl Habitat

The project will not impact Burrowing Owl or Burrowing Owl habitat. Burrowing Owl were not observed onsite and are not anticipated to occupy the property in the future.

Cactus Wren Habitat

The project will not impact Cactus Wren or Cactus Wren habitat. Cactus Wren do not occur on site and and they are not anticipated to occupy the property in the future. The study area does not contain any suitable Cactus Wren nesting vegetation (prickly pear or cholla cacti).

Hermes Copper Habitat

The project will not impact Hermes Copper butterfly or Hermes Copper butterfly habitat. Hermes Copper was not observed on site and it is not anticipated to occupy the property in the future. The study area does not contain spiny redberry the larval host plant for the Hermes Copper butterfly.

Construction-Related Impacts

Construction of the proposed project would have the potential to result in permanent, indirect impacts to existing sensitive biological resources by increasing or introducing invasive plant species into the project area and vicinity. Specifically, construction activities could promote the spread of exotics by creating disturbed areas that could result in the spread of these exotics into adjacent undisturbed areas, and ongoing potential erosion, runoff, and sedimentation into riparian areas. These permanent indirect impacts could degrade existing riparian area within the vicinity of the project. However, implementation of mitigation measures (described on page 15) would reduce this impact to a level less than significant. The landscape plan will stipulate that project landscaping will not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list. Furthermore, implementation of construction BMPs identified in mitigation measures (see page 15) would reduce temporary indirect impacts related to siltation/sedimentation and toxic substances to a level less than significant.

Impacts to Riparian Habitats and Sensitive Natural Communities

Based upon the County Guidelines for Determining Significance – Biological Resources (2010), a significant impact to riparian habitats and sensitive natural communities would occur if:

- Project-related construction, grading, clearing, or other activities will temporarily
 or permanently remove sensitive native or naturalized habitat on or off the Project
 Site.
- Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by ACOE, CDFW and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse

change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.

- The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.
- The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term, including: increasing human access; increasing predation or competition from domestic animals, pests or exotic species; altering natural drainage; and increasing noise and/or nighttime lighting to a level above ambient that has been shown to adversely affect sensitive species.
- The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

Construction Impact to Sensitive Native or Naturalized Communities

Off-site impacts will occur to non-native grasslands as a result of the proposed access road. Although currently in agriculture, this area was converted to agriculture without authorization. As a result, this analysis considers that the impacts are to non-native grasslands, which appear to be the habitat that was present prior to conversion based on review of historical aerial photographs. Normally mitigation for non-native grassland is at a ratio of 0.5:1. A 1:1 mitigation ratio will be required as a result of the fact that the non-native grassland was previously dedicated as open space resulting in a doubling of the typical mitigation ratio, pursuant to the County Report Format and Content Requirements – Biological Resources (2010).

Impact to Jurisdiction Wetlands or Riparian Habitats

Emergent wetlands occur on the project site within the existing open space easement; the open space easement will be retained as part of the proposed project. The project has been designed to include a limited building zone buffer that will not require additional need for fuel modification and vegetation management within the easement. The project site would not impact any jurisdictional wetlands or riparian habitats and no impact are identified for this subthreshold.

Draw Down of Water Table

Historical use of the on-site well has included watering the whole property including landscape and agriculture (>285,000 sf). The well was tested to determine if any draw down of existing nearby wells would occur during use. The well had a tested capacity 65 to 70 gallons per minute without drawing down a nearby offsite well, although the regular use of the onsite well was far below capacity levels. The well is controlled through a piped system and does not flow into or support the wetland in the open space. The proposed project will irrigate only 72,000 sf of landscaping using the onsite well. Using current water conservation methods such as limited spay emitters and a timed watering system, it is anticipated that there would be a >75% reduction in well water use for the proposed project as compared to existing uses. As a result, no significant impacts will occur to groundwater draw down.

Indirect Effects

Refer to the discussion of indirect effects under "Impacts to Special Status Species" for further information. Indirect impacts to riparian habitats and sensitive natural communities are anticipated to be less than significant upon implementation of project design measures to reduce indirect effects such as noise, lighting, and human access.

Wetland Buffer

A wetland buffer is an area or feature(s) surrounding an identified wetland that helps to protect the functions and values of the adjacent wetland A masonry retaining wall and vinyl coated chain link fence are design features of the project that would serve to separate the proposed development from open space easement areas, divert hardscape runoff from the wetland, and prevent encroachment by humans and domestic animals into the riparian open space. The project plans also include an approximately 16 to 40 foot buffer between the retaining wall/fence and the open space easement.

Impacts to Local Plans, Ordinances and Adopted Plans

Based upon the County Guidelines for Determining Significance – Biological Resources (2010), a significant impact related to local policies, ordinances and adopted plans would occur if the project would:

- Impact coastal sage scrub vegetation within lands outside of the MSCP in excess of the County's five-percent habitat loss threshold, or preclude connectivity between areas of high values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- Preclude or prevent the preparation of the subregional NCCP.
- Impact any amount of wetlands or sensitive habitat lands as outlined in the RPO.

- Not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- Not conform with the goals and requirements, as outlined in any applicable Habitat Conservation Plan, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort.
- Not minimize impacts to Biological Resources Core Areas (BRACs) within lands in the MSCP, as defined by the BMO.
- Not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- Reduce the likelihood of survival and recovery of listed species in the wild.
- Result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).
- Result in the take of eagles, eagle eggs or any part of an eagle (Bald Eagle Protection Act)

Impact to Coastal Sage Scrub

The project site does not contain any coastal sage scrub habitat. Habitats on the project site include emergent wetland, non-native grassland, row crops, and developed habitat. Therefore the project will not contribute to the loss of coastal sage scrub habitat or preclude connectivity between habitats of high value; no impact is identified related to this subthreshold.

Preparation of a Subregional NCCP

The project site is within a Take Authorized Area of the MSCP. The project would not impact the preparation of a subregional Natural Communities Conservation Plan (NCCP). Therefore no impact is identified for this subtreshold.

Impact Wetlands or Sensitive Lands as Identified in the RPO

Emergent wetlands occur on the project site; however that area will be preserved onsite within an existing open space conservation easement. The project site does not support any other land identified as sensitive in the County's Resource Protection Ordinance.

Minimization/Mitigation of Coastal Sage Scrub Habitat Loss

The project site does not contain any coastal sage scrub habitat. Habitats on the project site include emergent wetland, non-native grassland, row crops, and developed habitat. Therefore the project will not contribute to the loss of coastal sage scrub habitat and no impact is identified related to this subthreshold.

Non-Conformance with HCP, HMP, Special Area Management Plan, Watershed Plan or Similar Plan

There are no existing County HCPs, HMPs, Special Area Management Plans, or Watershed Plans for the area, and therefore there are no impacts.

Impacts to MSCP Narrow Endemic Species

No MSCP narrow endemic species have been identified within the project area and therefore there are no impacts.

Reduce Survival and Recovery of Listed Species

No Listed Species have been identified within the project area and therefore there are no impacts.

MBTA Species

Although no nests were observed, large trees are onsite and could provide nesting habitat for sensitive bird species such as Cooper's Hawk, which has a moderate potential to occur onsite and is covered under the Migratory Bird Treaty Act (MBTA). This represents a potentially significant impact. As a mitigation measure for this potential impact, if any construction work is proposed to occur during the County of San Diego raptor breeding season (January 1– July 15), a qualified biologist will be required to conduct a nesting raptor survey no more than three days prior to scheduled operations to ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest

so that nesting activities are not interrupted. The buffer should be a minimum of 500 feet, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the young have fledged and will not be impacted by the project. This will reduce the potential impact to below a level of significance.

Take of Eagles or Eagle Eggs

No golden eagles have been recorded in the project area and no nesting sites are known within 4000 feet of the project site. Thus the project would not have an impact to eagles. No impact is identified for this subthreshold.

Cumulative Impacts

Pursuant to the County Report Format and Content Requirements, a reasonable list of cumulative projects should be compiled based on past, present, and future projects that could also cumulatively contribute to biological resources impacts. Projects within a 3-mile radius were considered. A total of 23 projects were identified. Of the 23 projects, two projects were identified as impacting the same type of biological resources as the project. The loss of 18.77 acres on non-native grassland is anticipated to occur from the two cumulative projects that were identified. The 0.3 acre impact to non-native grassland from the current project would be mitigated at a 1:1 ratio, reducing the potential impacts to less than significant. Since the project's minor impacts to non-native grassland habitat would be less than significant and not cumulatively considerable, the project would not contribute to significant cumulative impacts.

MITIGATION

Impacts to non-native grassland as a result of the access road require mitigation in conformance with the MSCP. The project will mitigate this impact at a 1:1 ratio through the off-site preservation of similar or higher value habitat within Crestridge Mitigation Bank. This mitigation ratio is a result of the fact that the impacted non-native grassland is located within previously dedicated as open space, resulting in a doubling of the typical mitigation ratio pursuant to the County Report Format and Content Requirements – Biological Resources (2010). Implementation of this mitigation will reduce the impact to below a level of significance.

Although no nests were observed, large trees are onsite and could provide nesting habitat for sensitive bird species such as Cooper's Hawk, which has a moderate potential to occur onsite and is covered under the Migratory Bird Treaty Act (MBTA). This represents a potentially significant impact. As a mitigation measure for this potential impact, if any construction work is proposed to occur during the County of San Diego raptor breeding season (January 1– July 15), a qualified biologist will be required to conduct a nesting raptor survey no more than three days prior to scheduled operations to ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest

so that nesting activities are not interrupted. The buffer should be a minimum of 500 feet, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the young have fledged and will not be impacted by the project. This will reduce the potential impact to below a level of significance.

Siltation and erosion control BMPs will be implemented during construction, including boundary silt fencing, gravel bags, fiber rolls, weed-free straw wattles and mulch, and slope stabilization. Runoff from the pavement of the newly constructed bridge and ramps will drain to pervious concrete.

The limits of project impacts (including construction staging areas and access routes) will be clearly delineated with temporary construction fencing, stakes, flags, or markers that will be installed in a manner that does not impact habitats to be avoided and such that they are clearly visible to personnel on foot and operating heavy equipment. This delineation will be conducted under the supervision of the County-approved biologist prior to commencement of construction activities and will remain in place during all construction activities. All temporary fencing will be shown on grading plans and/or associated construction documents. If work occurs beyond the fenced or demarcated limits of impact, all work will cease until the problem has been remedied to the satisfaction of the County. Temporary construction fencing and markers will be maintained in good repair until the completion of project construction and removed upon project completion.

The landscape plan will stipulate that project landscaping will not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list.

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Preparer and Persons/Organizations Contacted

Prepared by:

Public Character Assured District

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Robin Church, County Approved Biologist

Korey Klutz, County Approved Biologist

Thony Mit

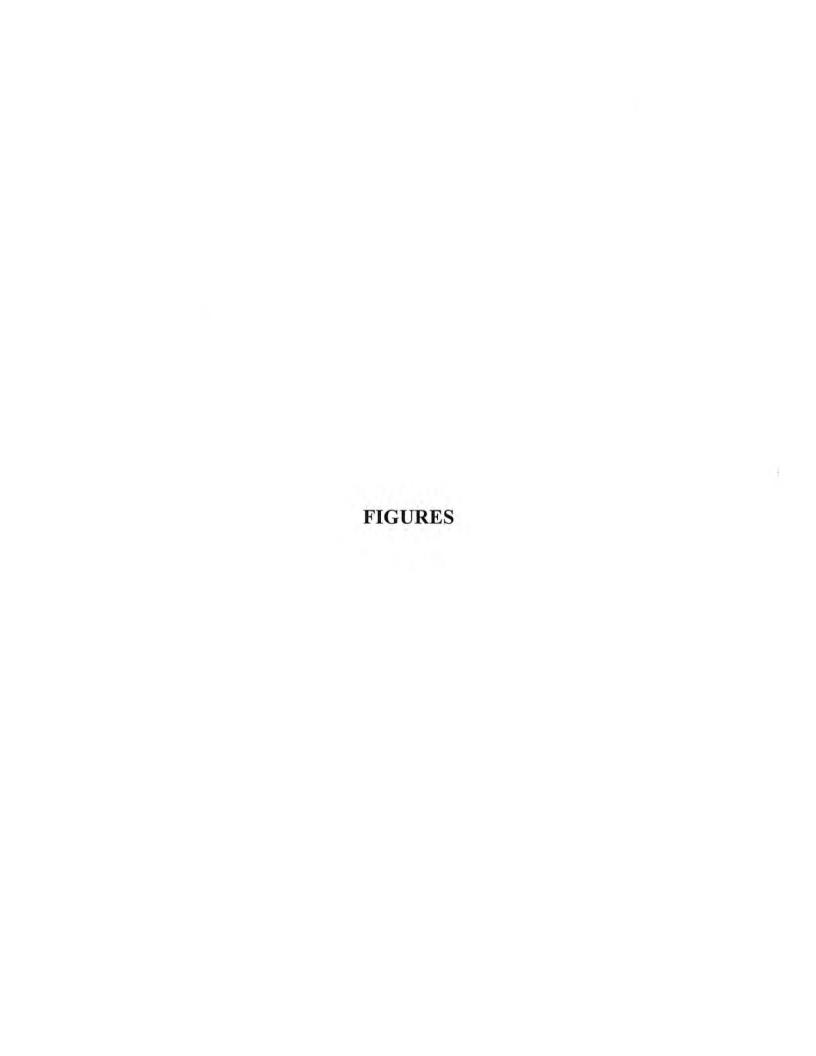
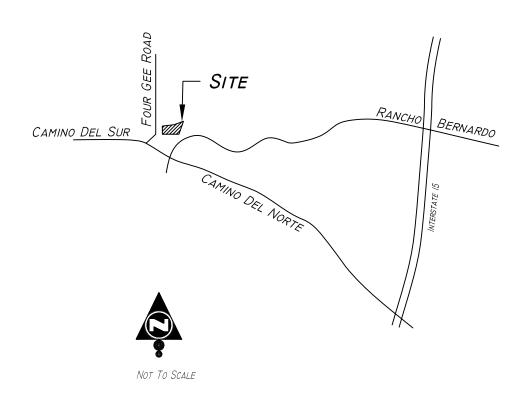




Figure 1 Regional Location Map





RC
Biological Consulting, Inc.

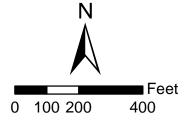
Vicinity Map

Figure 2



Source: Terraserver 1/1/2008

Figure 3 Surrounding Land Use



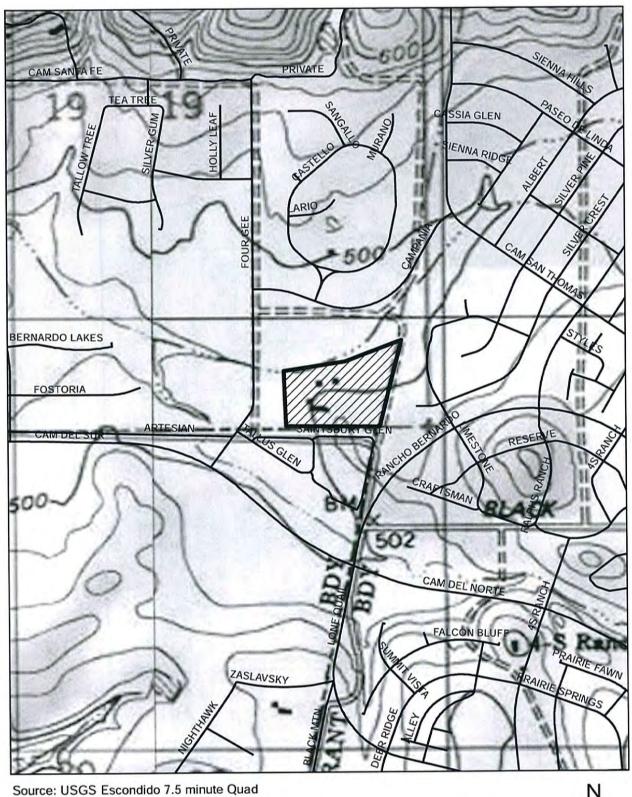
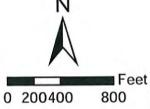


Figure 4 USGS Topographic Map



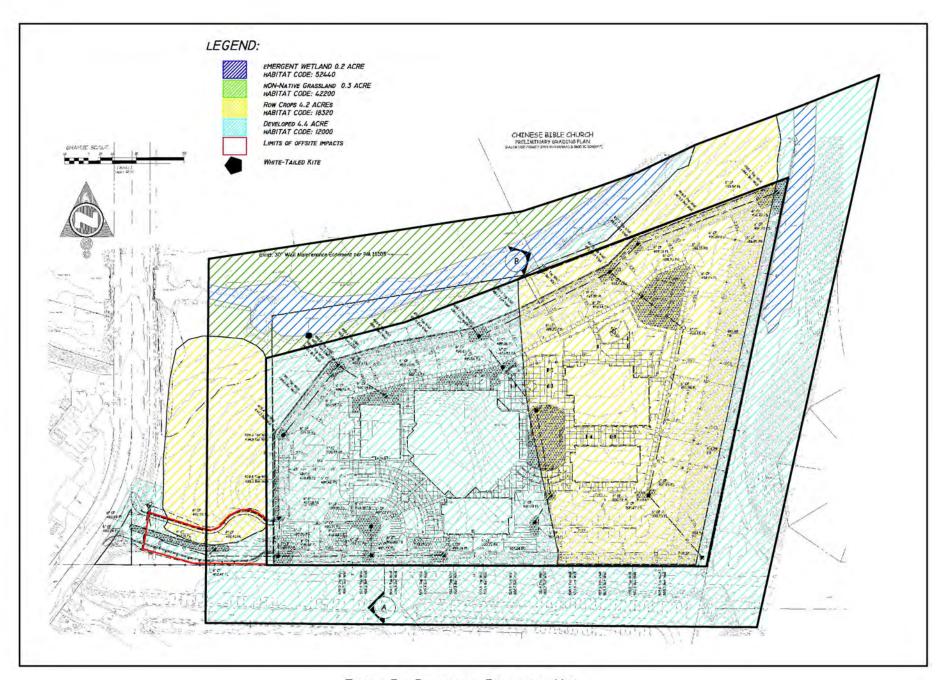
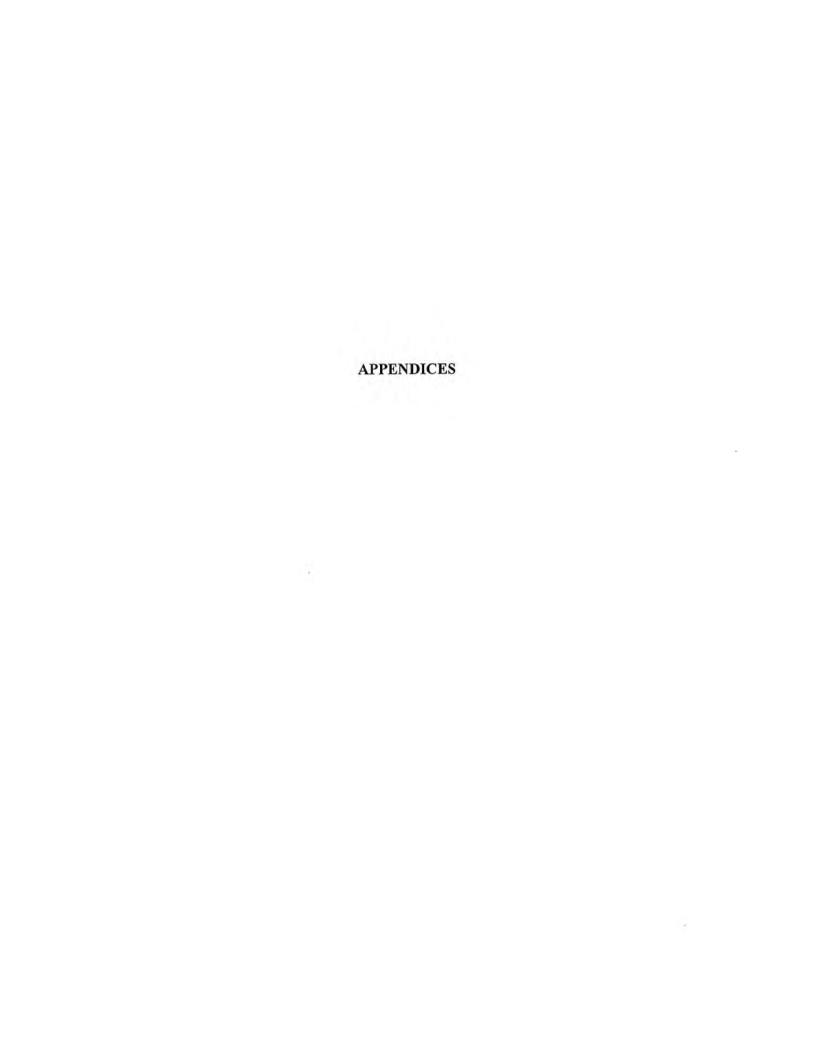


FIGURE 5 - BIOLOGICAL RESOURCES MAP



Family Name	Species Name	Common Name	Habitat
Anacardiaceae	*Schinus molle	Peruvian Pepper	Dev
Apiaceae	*Foeniculum vulgare	Sweet Fennel	NNG
Arecaceae	*Washingtonia filifera	California Fan Palm	Dev
Asteraceae	*Picris echiodes	Bristly ox-tongue	NNG/Row Crops
Asteraceae	*Silybum marianum	Milk Thistle	Row Crops
Asteraceae	*Conyza bonariensis	Flax-leaf Fleabane	NNG
Brassicaceae	*Raphanus sativus	Wild Radish	NNG
Cactaceae	*Opuntia ficus-indica	Mission Prickly-pear, Indian-fig	NNG
Chenopodiaceae	*Chenopodium multifidum	Goosefoot	NNG/Row Crops
Cycadaceae	*Cycas revoluta	Sago Palm	Emergent Wetland
Cyperaceae	Scirpus sp.	Bulrush	Emergent Wetland
Fabaceae	*Medicago minima	Burclover	NNG
Geraniaceae	*Erodium cicutarium	Red-stem Filaree/storksbill	NNG
Malvaceae	*Malva parviflora	Cheeseweed	NNG
Myrtaceae	*Eucalyptus sp.	Eucalyptus	DEV, NNG
Pinaceae	*Pinus sp.	Pine	DEV
Poaceae	*Cynodon dactylon	Bermuda Grass	Dev
Polygonaceae	*Rumex crispus	Curly Dock	NNG/Row Crops
Salicaceae	Salix lasiolepis	Arroyo Willow	Emergent Wetland
Typhaceae	Typha latifolia	Broad-leaf Cattail	Emergent Wetland

Numerous additional unidentified ornamental plant species occur within the developed portion of the site.

	APPENDI	X B	
WILDLIFE SPECIES OF	SERVED ON THE CHINESE		N DIEGO PROPERTY
Common Name	Scientific Name	Habitat Observed *	# Observed (estimate
Birds			
Ash-throated flycatcher	Myiarchus cinerascens	Row Crop	2
Black phoebe	Sayornis nigricans	Row Crop	1
Bushtit	Psaltriparus minimus	NNG	2
House finch	Carpodacus mexicanus	Dev	4
Mourning dove	Zenaida macroura	Dev	1
Song Sparrow	Melospiza melodia	Emergent Wetland	2
White-crowned sparrow	Zonotrichia leucophrys	NNG/Row Crop	>5
White-tailed Kite	Elanus cearulus	Emergent Wetland	3
Mammals		The Table 14 Y	
Coyote Scat	Canis latrans	Non native grassland	several

APPENDIX C

SENSITIVE SPECIES OBSERVED OR WITH THE POTENTIAL TO OCCUR WITHIN OR ADJACENT TO THE CHINES BIBLE CHURCH OF SAN DIEGO

Scientific Name and Common Name	Sensitivity Codes			s	Habitat Preference/	Verified On-Site	Potential to Occur	Factual Basis for
	CNPS	County	State	Federal	Requirements	Yes/No (Direct/Indirect Evidence)	On-Site (Observed L/M/H/U)	Determination of Occurrence Potential
CENTROMADIA PARRYI SSP. AUSTRALIS "southern tarplant"	1B.1	۸	None	SOC	Marshes & swamps (margins, alkaline), valley & foothill grasslands (vernally mesic), vernal pools, 1-425 meters, May- Nov	No	Low	Site does not contain alkaline habitat
CENTROMADIA PÜNGENS SSP. LAEVIS "smooth tarplant"	18.1	A	CE	SOC	Chenopod scrub, meadows & seeps, playas, riparian woodland, valley & foothill grassland/alkaline, 0-480 meters, April -September	No	Low	Site does not contain alkaline habitat
IVA HAYESIANA "San Diego marsh-elder"	2,2	В	None	soc	Marshes & swamps, playas, 10-500 meters, Blooms April-October	No	Low	Would have observable and was not detected.
JUNCUS ACUTUS SSP: LEOPOLDII "southwestern spiny rush"	4.2	D	None	None	Coastal dunes/mesic, meadows & seeps(alkaline seeps & marshes), swamps(coastal salt), 3-900 meters, May-June	No	Low	Site does not contain alkaline habitat.

SENSITIVITY CODES

FEDERAL SPECIES DESIGNATIONS (USFWS 2001)

FE- Federal Endangered Species

FT- Federal Threatened Species FPE- Taxa proposed to be listed as Endangered

FPT- Taxa proposed to be listed as Threatened

SOC- Species of Concern (former Candidate Species)

SE- State listed as Endangered

CT- State listed as Threatened

CR- State listed as Rare

SCE- State Candidate for listing as Endangered

STATE SPECIES DESIGNATIONS (CDFG 2000)

SCT- State Candidate for listed as Threatened

CSC- CDFG "Species of Special Concern

CE-California endemic

CALIFORNIA NATIVE PLANT SOCIETY DESIGNATIONS (CNPS 2007 online)

The CNPS Lists

List 1 - Plants of highest priority

List I A- Plants presumed extinct in California

List 1B- Plants rare, threatened or endangered in California and elsewhere

List 2- Plants rare, threatened or endangered in California, but more common elsewhere

List 3- Plants about which we need more information (A Review List)

List 4- Plants of limited distribution (A Watch List)

Threat Code Extensions

- 1 Seriously endangered in California
- 2 Fairly endangered in California
- 3 Not very endangered in California

COUNTY OF SAN DIEGO DESIGNATIONS (COUNTY 2006)

The County Lists

List A- Plants rare, threatened or endangered in California and elsewhere

List B- Plants rare, threatened or endangered in California but more common elsewhere

List C-Plants which may be quite rare, but need more information to determine their true rarity status

List D- Plants of limited distribution and are uncommon, but not presently rare or endangered

NE-MSCP narrow endemic

APPENDIX D

SENSITIVE WILDLIFE SPECIES OBSERVED AND WITH POTENTIAL TO OCCUR WITHIN OR ADJACENT TO THE THE CHINESE BIBLE CHURCH OF SAN DIEGO PROPERTY (USGS ESCONDIDO OUAD)

Common Name and Sensitivity Code and Status Scientific Name County State Fed	Sensit	ivity Code and	Status	Habitat Preference/Requirements	Potential On-Site	Factual Basis for Determination of Occurrence Potential
	1	Federal				
INSECTS						No host plant onsite.
Dun skipper Euphyes vestris harbisoni	Group 1			Woods and edges, prairies and roadsides, seeps and springs in southern California (Glassberg 2001). Primary host plant Carex spissa (Faulkner and Klein 2003).	Low	No nost plant onsite.
AMPHIBIANS						
Western spadefoot toad Scaphiopus hammondii	Group 2	CSC	SOC	Grassland situations can occasionally occur in valley-foothill hardwood woodlands. Populations may persist a few years in orchard-vineyard habitats; 0-3000ft.	Low	No open pools for breeding or suitable upland habitat.
REPTILES			7			6 4 16/
Coronado skink Eumeces skiltonianus interparietalis	Group 2	CSC	soc	Coastal sage scrub, grassland, riparian, near vernal pools, oak woodlands, chamise chaparral, mixed conifer, closed cone forests, and freshwater marshes. Found during the winter after rainfalls or during spring; 0-3000ft.	Moderate	Emergent wetland fringe may have suitable habitat.
South coast garter snake Thamnophis sirtalis novum	Group 2	CSC		Restricted to marsh and upland habitats near permanent water that have good strips of riparian vegetation	Low	Emergent wetland is densely vegetated lacking open pools.
Two-stripe garter snake Thamnophis hammondii	Group 1	CSC	SOC	Found in or near permanent fresh water, often along streams with rocky beds bordered by willows or other streamside growth. Sometimes near vernal pools; 0-1000ft.	Low	Emergent wetland is densely vegetated lacking open pools.
MAMMALS						
Greater western mastiff bat Eumops perotis californicus	Group 2.	CSC		Open semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban. Crevices in cliff faces, high buildings, trees, and tunnels are required for roosting; 500-3000ft.	Low potential to roost.	The site is at the low end of the elevation range for this species.

APPENDIX D

SENSITIVE WILDLIFE SPECIES OBSERVED AND WITH POTENTIAL TO OCCUR WITHIN OR ADJACENT TO THE THE CHINESE BIBLE CHURCH OF SAN DIEGO PROPERTY (USGS ESCONDIDO QUAD)

Common Name and Scientific Name	Sensitivity Code and Status			Habitat Preference/Requirements	Potential On-Site	Factual Basis for Determination of Occurrence Potential	
County	State	Federal					
Pocketed free-tailed bat Nyctinomops femorosaccus	Group 2	CSC	I	This species is found in a variety of plant associations including desert scrub, coastal scrub and pine oak woodlands. Is a colonial roosting species that is typically found in crevices of rugged cliffs and high, rocky outcrops; 0 to 3000ft.	Low potential to roost onsite.	No suitable roosting habitat.	
BIRDS							
Cooper's Hawk Accipiter cooperi	Group I	CSC (nesting)		Widespread over San Diego's coastal slopes where there are stands of trees. Just as common in Eucalyptus stands as oaks (Unitt 2004).	Moderate	No nests observed in trees onsite.	
Green heron Butorides striatus	Group 2			Riparian, freshwater marsh, lakes and bays; 0- 500ft.	Low	Prefers to fish in ponds and channels bordered by shade trees. (Unitt 2004)	
Northern harrier Circus cyaneus hudsonius	Group1	CSC		Grasslands and salt, alkali and freshwater marshes; 0-1000ft. Nests on ground in shrubby vegetation, usually emergent wetlands or along rivers or lakes. May also nest in grasslands, grain fields, or on sagebrush flats several miles from water.	Low	No suitable habitat.	
Sharp-shinned hawk (nesting) Accipiter striatus	Group I	CSC		Open woodlands, residential, larger trees for nesting. Uncommon migrant and winter visitor, casual summer visitor; nesting has not been documented in San Diego County (Unitt 2004).	Low potential to nest onsite.	Not known to nest in San Diego County.	
Tricolored blackbird Agelaius tricolor	Group 1	CSC		Breeds near fresh water, preferably in emergent wetland with tall, dense cattails or tules, but also in thickets of willow, blackberry, wild rose, tall herbs.	Low potential to occur.	Breeding limited to nine colonies any birds in this area are presumed migrants or dispersers only (Unitt 2004).	
White-tailed kite Elanus caeruleus	Group I	CSC Fully protected		Yearlong coastal & valley lowlands, usually near ag. areas. Forage: open grasslands, meadows, farmlands, wetlands, freeway divides. Nests in tops of tall trees near open areas.	Observed	Observed in the emergent wetland onsite.	

Common Name and Scientific Name	Sensi	tivity Code and		DIEGO PROPERTY (USGS ESCO Habitat Preference/Requirements	Potential On-Site	Factual Basis for Determination of Occurrence Potential	
County State Federal	Federal						
SENSITIVITY CODES							
FEDERAL SPECIES D	ESIGNATIONS	S (USFWS 20	01)		STATE SPECIES DESIG	GNATIONS (CDFG 2000)	
Category					Category		
FE- Federal Endangered					SE- State listed as Endangered		
FT- Federal Threatened	* 22 2 2 2 2 2				ST- State listed as Threatened		
FPE- Taxa proposed to b					SR- State listed as Rare		
FPT- Taxa proposed to b					SCE- State Candidate for listing as Endangered		
SOC- Species of Concer	n (former Candid	ate Species)			SCT- State Candidate for listed as Threatened CSC- CDFG Species of Special Concern		
					CSC- CDFG Species of Sp	beciai Concern	
COUNTY OF SAN DIE	GO DESIGNAT	TIONS (COU	NTY 2006)		_		
The County Groups							
				e they are listed as threatened or endangere	ed		
ow becomes they	have a very spec	rific natural hi	story requiremen	ts that must be met			

Mail to: California Natural Diversity Database Department of Fish and Game 1807 13th Street, Suite 202 Sacramento, CA 95811 Fax: (916) 324-0475 email: CNDDB@dfg.ca.gov

Date of Field Work (mm/dd/yyyy): 01/12/2012

For Office Use Only							
Source Code	Quad Code	_					
Elm Code	Occ. No						
EO Index No	Map Index No						

Reset California Native Species Field Survey Form			Send Form
Scientific Name: Elanus caeruleus			
Common Name: White-tailed Kite			
Species Found? Yes No If not, why Total No. Individuals Subsequent Visit? Is this an existing NDDB occurrence? Yes, Occ. # Collection? If yes: Number Museum / He	□yes ☑ no □ no ☑ unk.	Reporter: Robin Church Address: 12737 Campo Road Spring Valley, CA 91978 E-mail Address: Robin@rcbio.com Phone: (619) 463-1072	
Plant Information	Animal Informa	ition	
Phenology:%%% fruiting	# adults wintering	# juveniles # larvae # egg m.	
County: San Diego	Lan	downer / Mgr.: Private	500 Cart
Quad Name: <u>Escondido</u> T_ ^{13S} _ R_ ^{2W} _ Sec,¼ of¼, Meri			p & type):
T R Sec, ¼ of ¼, Meri DATUM: NAD27 □ NAD83 □ WG Coordinate System: UTM Zone 10 □ UTM Zo Coordinates:	S84 🔲	Horizontal Accuracy	meters/feet
Habitat Description (plants & animals) plant cor Animal Behavior (Describe observed behavior, such as Roosting in a willow within an emergent wetland adj	territoriality, foraging	, singing, calling, copulating, perching, roosting, et	c., especially for avifauna):
Site Information Overall site/occurrence quality/v Immediate AND surrounding land use: developed, agric Visible disturbances: Threats: Comments:	viability (site + pop		☑ Fair □ Poor
Determination: (check one or more, and fill in blanks) Keyed (cite reference): Compared with specimen housed at: Compared with photo / drawing in: By another person (name): Other:		Photographs: (check one or me Plant / animal Habitat Diagnostic feature May we obtain duplicates at our	