78-075 MAIN STREET, SUITE G-203
LA QUINTA, CALIFORNIA 92253
T 760.341.6660 F 760.346.6118

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Jim Kelly
SD Renewables, Inc.
4747 Executive Drive, Suite 800
San Diego, California 92121

Subject: Biological Resources Assessment for the Casa Del Zorro Project (PDS2019-AD-19-028), Borrego Springs, San Diego County, California

Dear Mr. Sawicki:

This biological resources assessment describes the existing biological conditions of the proposed Casa Del Zorro Project (PDS2019-AD-028), hereafter referred to as "project." The proposed project is analyzed in the context of the California Environmental Quality Act (CEQA).

This biological resources assessment was conducted for the approximately 6.6-acre project site (proposed project footprint) and a 100-foot buffer (study area), wherein special-status biological resources are analyzed in the context of CEQA. The final project footprint consists of 6.6 acres.

1 Project Location and Description

The proposed project involves approximately 800 kilovolts of renewable solar generation within the 6.6-acre project site and is located approximately 5.25 miles northwest of State Route 78 and 21.3 miles southeast of the Salton Sea. More specifically, the project site is located within the unincorporated community of Borrego Springs in San Diego County, south of Borrego Springs Road, west of Yaqui Pass Road, and northeast of Deep Well Trail (Figure 1, Project Location; figures included in Attachment A). The project occurs within Section 22, Township 11 South, and Range 6 East of the U.S. Geological Survey (USGS) Borrego Sink 7.5-minute quadrangle. The approximate center of the site corresponds to latitude 32.21° north and longitude 116.33° west.

2 Methods

2.1 Literature Review

For this biological resources assessment, "special-status" species are those that are referred to from the County of San Diego sensitive species list.

Other special-status biological resources considered include sensitive plant communities; wetlands, including riparian habitat; and wildlife corridors. Sensitive plant communities are those that are considered to support unique vegetation communities with a rank of S1–S3 on the CDFW California Natural Community List (CDFW 2019).

2.2 Field Reconnaissance

The entire 6.6-acre parcel and a 100-foot buffer, referred to collectively as the "study area," was surveyed for biological resources. Dudek Biologist Anna Cassady conducted a general biological survey of the study area on October 2, 2019, from 10:05 a.m. to 12:40 p.m. The survey was conducted when weather conditions were favorable with 0% cloud cover, wind speeds from 0 to 1 mph, and temperatures ranging from 82°F to 93°F. The general biological resources assessment was conducted on foot, and the proposed project footprint was walked thoroughly to complete the resource inventory. All native and naturalized plant species encountered within the study area were identified and recorded. The potential for special-status plant and wildlife species to occur within the study area was evaluated based on the vegetation communities, soils present, and surrounding features. Vegetation communities and land covers on site were mapped directly in the field. A formal jurisdictional delineation was not conducted; however, the study area was evaluated for the potential to support jurisdictional waters regulated under the federal Clean Water Act, California Fish and Game code, and Porter-Cologne Water Quality Act.

Latin and common names for plant species with a CRPR follow the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2019). For plant species without a CRPR, Latin names follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2019), and common names follow the U.S. Department of Agriculture's Natural Resources Conservation Service Plants Database (USDA 2019a). Natural vegetation communities were mapped in the field following *A Manual of California Vegetation*, second edition (Sawyer et al. 2009), where feasible, with modifications to accommodate the lack of conformity of the observed communities to those of Oberbauer et al. (2008). Latin and common names of animals follow Crother (2012) for reptiles and amphibians, the American Ornithologists' Union (AOU 2015) for birds, Wilson and Reeder (2005) for mammals, the North American Butterfly Association (NABA 2001) for butterflies, and Moyle (2002) for fish.

Dudek used geographic information system (GIS) software to map biological resources and provide figures.

2.3 Rare Plant Survey

A rare plant survey was performed on the site (Attachment G) within the flowering periods of the focal plant species (California ayenia (*Ayenia compacta*)). Plant species bloom at slightly different times each year depending on temperature, rainfall patterns, elevation, and other environmental factors. Reference population checks involve locating populations of target species during a time frame when they are known to be blooming or exhibiting other phenological characteristics that allow for species identification. Observations of reference populations during peak phenology provide assurance that these species would be identifiable if they were present in the study area. Based on communications with the Anza-Borrego Desert State Park Botany Society, California ayenia was observed in bloom within a canyon along Mine Wash within Anza Borrego State Park on April 5, 2020 (Fred Melgert, personal communication, April 5, 2020). Dudek Botanist Charles Adams conducted a focused special-status plant survey for California ayenia within the study area on April 6, 2020. Mr. Adams was on site from 9:00 a.m. to 1:35 p.m. under suitable weather conditions (62°F–69°F, 0–9 mile-per-hour winds, and partly cloudy skies). Surveys for special-status species were conducted within the study area by walking transects within the entire study area, with the exception of areas classified as developed lands. Focused special-status plant surveys conformed to California Native Plant Society Botanical Survey Guidelines (CNPS 2001), Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities (CDFG 2009), and U.S. Fish and Wildlife Services General Rare Plant Survey Guidelines (Cypher 2002).

2.4 Survey Limitations

The vegetation mapping was conducted during the day and during the months of the year when most fall blooming annuals and perennials are evident or identifiable. Due to the timing of the reconnaissance survey, a spring survey was required

Surveys specifically aimed at detection of the full range of wildlife species were not conducted. However, notes were taken for incidental wildlife observations made during surveys to establish a general baseline of wildlife diversity within the study area and to assist in the performance of a habitat assessment for species. These surveys were conducted during the daytime, which usually results in few observations of mammals, many of which may be active at night. In addition, many species of reptiles and amphibians are nocturnal or cryptic in their habits and are difficult to observe using standard meandering transects.

The current survey effort provides an accurate representation of the potential for special-status species to occur in the study area. The surveys conducted to date were thorough and comprehensive, and the results of the study contained herein provide a reasonable, accurate assessment of the study area.

3 Results

3.1 Site Description

The project site is characterized as undeveloped land and is bounded by Borrego Springs Road to the north, Yaqui Pass Road to the east, and Deep Well Trail to the southwest. The study area includes a mix of undeveloped land to the northeast and southwest, as well as development comprised of La Casa del Zorro Resort and Spa to the east, a vacant gas station to the north, and an American Legion Post to the northwest. Elevations on site range from approximately 510 to 540 feet above sea level. Representative photographs of the project site are included in Attachment B, Site Photographs.

3.2 Soils

One soil series type, Carrizo very gravelly sand, 0%–9% slopes, is mapped within the study area and is described in more detail below (USDA 2019b). The spatial distribution of soil types within the study area are depicted in Figure 2, Soils.

- **Carrizo Family Series** consists of moderately alkaline, extremely gravelly sand that formed in mixed igneous alluvium. Carrizo soils are on found on a variety of landforms within flood plains, fan piedmonts, and bolson floors at elevations of 270 feet below mean sea level to 2,600 feet above mean sea level. These soils are excessively drained with negligible to low runoff and rapid permeability. This soil type is extensively distributed and support areas used for rangeland, recreation, and wildlife habitat. Typical vegetation within this series include creosote bush (*Larrea tridentata*) and white bursage (*Ambrosia dumosa*) shrublands.

3.3 Vegetation Communities and Land Covers

One vegetation community and one land cover type were identified and mapped within the study area based on general characteristics and/or species composition: creosote bush-allscale saltbush scrub and urban/developed land. Figure 3, Biological Resources, illustrates the distribution of vegetation communities and land covers, and Table 1 provides a summary of each land cover's extent within the study area.

Table 1. Vegetation Communities and Land Covers within the Study Area (Project Site and a 100-Foot Buffer)

Vegetation Community/Land Cover	Holland Code[1]	Acreage
Vegetation Communities		
Creosote bush–allscale scrub association	33100[2]	10.48
Non-natural Land Covers		
Urban/developed	12000	7.93
	Total[3]	**18.42[4]**

Sources: Sawyer et al. 2009; Oberbauer et al. 2008.
Notes:
1 Holland (1986) as modified by Oberbauer et al. (2008).
2 The code is for Sonoran Creosote Bush Scrub, which is the Holland equivalent to Sawyer et al.
3 Totals may not add due to rounding.
4 18.42 acres represents the project parcel and a 100-foot buffer. The proposed project is 6.6 acres.

3.3.1 Creosote Bush Scrub

The creosote bush scrub alliance includes creosote bush as dominant or co-dominant in an intermittent to open shrub layer less than 3 meters (9.8 feet) in height and occurs on desert pavement or well-drained soils within alluvial fans, upland slopes, or small intermittent washes (Sawyer et al. 2009). Species associated with this community include white bursage, cheesebush (*Ambrosia salsola*), shadscale (*Atriplex confertifolia*), desert holly (*Atriplex hymenelytra*), allscale (*Atriplex polycarpa*), brittle bush (*Encelia farinosa*), California joint fir (*Ephedra californica*), Nevada joint fir (*Ephedra nevadensis*), and Anderson's boxthorn (*Lycium andersonii*) (Sawyer et al. 2009).

The creosote bush–allscale scrub association is one of 10 associations within the creosote bush scrub alliance, co-dominated by both creosote bush and allscale (CDFW 2018).

Within the study area, the creosote bush–allscale scrub association was mapped within the project site and along the northern, northeastern, and southwestern extent of the study area. Associated plant species present within this community include cheesebush, brittle bush, Wiggin's cholla (*Cylindropuntia echinocarpa*), branched pencil cholla (*Cylindropuntia ramosissima*), blue palo verde (*Parkinsonia florida*), honey mesquite (*Prosopis glandulosa*), and catclaw acacia (*Senegalia greggii*).

The creosote bush scrub alliance and its associations have a rank of G5S5 in the California Natural Communities List (CDFW 2019), meaning that it is secure both globally and within the state. Therefore, this community is not considered a sensitive biological resource under CEQA (CDFW 2019).

3.3.2 Urban/Developed Land

Urban/developed areas include areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation (Oberbauer et al. 2008).

Within the study area, developed areas include paved roads (e.g., Borrego Springs Road, Yaqui Pass Road, and Deep Well Trail) and rural commercial developments.

Developed land is not a vegetation community; therefore, it is not considered a sensitive biological resource under CEQA (CDFW 2019).

3.4 Floral Diversity

A total of 16 species of vascular plants, including 12 native (75%) and 4 non-native (25%), were recorded within the study area. This low plant diversity reflects the study area's small size, its proximity to adjacent roadways and other developed areas, and lack of detectable annual or cryptic perennial plant species due to seasonal constraints. Plant species observed within the study area are listed in Attachment C, Vascular Plant Species.

3.5 Wildlife

A total of three bird species were detected within the study area, including bushtit (*Psaltriparus minimus*), house finch (*Haemorhous mexicanus*), and black-throated sparrow (*Amphispiza bilineata*). No bird nests were observed during the survey. No amphibian species were observed and are unlikely to occur due to the lack of aquatic or vernal pool habitat in the surrounding areas. One reptile species, common side-blotched lizard (*Uta stansburiana*), was observed. Gophersnake (*Pituophis catenifer*) is another common reptile species that would be expected to occur within the study area. Two mammal species were detected during the survey: desert cottontail (*Sylvilagus audubonii*) and black-tailed jackrabbit (*Lepus californicus*). The black-tailed jackrabbit individual observed is not considered the San Diego subspecies (*Lepus californicus bennettii*) due to their disparate geographical ranges (also discussed in Attachment F, Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area). Other common mammal species expected to occur include coyote (*Canis latrans*) and striped skunk (*Mephitis mephitis*). Wildlife species observed within the study area are listed in Attachment D, Wildlife Species.

3.6 Special-Status Plant Species

Attachment E, Special-Status Plant Species Detected or Potentially Occurring in the Study Area, lists special-status plant species that the County of San Diego requested the project analyze. For each species listed, a determination was made regarding the potential for the species to occur in the study area based on information gathered during the field reconnaissance, including the location of the site, habitats present, current site conditions, and past and present land use.

Attachment G reports on the focused rare plant survey. No special-status plants species were incidentally detected within the study area during the 2019 reconnaissance survey. The focused special-status survey for California ayenia was negative. Additionally, no federally or state listed or non-listed CRPR 1-4s were incidentally observed during the focused survey on April 6, 2020.

No federally or state-listed species have a potential to occur within the study area. The remainder of the non-listed special-status species were determined to have low potential to occur or were not expected to occur within the study area.

3.7 Special-Status Wildlife Species

Attachment F, Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area, lists special-status wildlife species that the County of San Diego requested the project analyze. For each species listed, a determination was made regarding potential use of the project site based on information gathered during the field reconnaissance, known habitat preferences, and knowledge of the species' relative distributions in the area.

No focused special-status wildlife surveys were conducted. No special-status wildlife species were incidentally detected within the study area during the 2019 reconnaissance survey.

No federally or state-listed species have a potential to occur within the study area. However, three non-listed special-status species, loggerhead shrike (*Lanius ludovicianus*; SCC), ferruginous hawk (*Buteo regalis;* BCC), and prairie falcon (*Falco mexicanus;* BCC), were determined to have a moderate potential to occur within the study area. The remainder of the non-listed special-status species were determined to have low potential to occur or were not expected to occur within the study area.

3.8 Nesting Birds

The study area contains some shrubs and low trees that provide potential habitat for commonly occurring nesting birds, such as northern mockingbird and house finches. The study area does not include large trees or cliff ledges that would support raptors that occur in the region; however, the desert scrub could support the foraging of some species such as the prairie falcon. The study area does not support large swaths of habitat or aquatic habitat that would act as stopover habitat for migratory birds. No nests were observed within the study area during the survey.

3.9 Jurisdictional Waters and Significant Drainage Courses

Two erosional features enter the project site from Deep Well Trail, traveling north across the site towards Borrego Springs Road. These features likely originate from runoff from the surrounding rural residential community. An ordinary high water mark is evident within both features, characterized by absence of vegetation, defined bed/bank, sediment deposition, and debris wracking. Both features meander for a short distance within the project site before the ordinary high water mark becomes obscured with the only sign of continuation being evidence of sheet flow. Both features appear to dissipate before reaching Borrego Springs Road. A review of historic aerials (Google Earth 2019; Historic Aerials 2019) does not indicate that either of these features are remnant of historic drainages. These features are believed to be erosional and the result of runoff during rain events. Erosional features are not considered to be jurisdictional waters under ACOE, Regional Water Quality Control Board, or CDFW.

3.10 Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. In areas with open landscapes, wildlife has the potential to move across the landscape unimpeded and are not necessarily restricted to movement corridors. Where landscapes have movement constraints such as dense vegetation, steep slopes and canyons, or constructed impediments such as roads and human activity, wildlife may be restricted to wildlife corridors. Wildlife corridors are defined as areas that connect suitable wildlife habitat in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features, such as canyon drainages, ridgelines, or areas with vegetation cover, provide corridors for wildlife travel. Wildlife corridors contribute to population viability by (1) assuring the continual exchange of genes between populations, which helps maintain genetic diversity; (2) providing access to adjacent habitat areas, representing additional territory for foraging and mating; (3) allowing for a greater carrying capacity; and (4) providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (e.g., fires).

Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation. The linkage represents a potential route for gene flow and long-term dispersal. Habitat linkages may serve as both habitat and avenues of gene flow for small animals such as reptiles and amphibians. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat "islands" that function as "stepping stones" for dispersal.

The project site is not within a regionally designated habitat linkage and is located within low-density, rural development with space between dwellings to allow for movement. The project site is confined within roadways on all sides, with open space to the north, rural development to the south and west, and a dense cluster of development immediately east; however, the greater vicinity of the project site is open and unconstrained.

4 Local Regulatory Setting

4.1 Draft East County Multiple Species Conservation Program

The County of San Diego (County) is working on a draft East County Multiple Species Conservation Program (ECMSCP) for the eastern part of the unincorporated area that is bounded by Riverside County to the north, Imperial County to the east, Mexico to the south, and the Cleveland National Forest to the west. The draft ECMSCP encompasses approximately 1.6 million acres, including Oak Grove, Warner Springs, Borrego Springs, Ocotillo Wells, Julian, Agua Caliente Springs, Pine Valley, Tecate, Boulevard, Jacumba, and Campo. The draft ECMSCP is being prepared as a multiple species habitat conservation plan and a natural community conservation plan. The draft ECMSCP would provide coverage for 157 species, including 83 plant and 74 wildlife species (County of San Diego 2020).

The entire study area is located within the boundaries of the draft ECMSCP and is mapped as "Agricultural or Natural Upland outside Focused Conservation Area (FCA) and Developed Lands" (Figure 4, Regional Context). Until the ECMSCP is approved, the Planning Agreement between the County and the Agencies (County of San Diego 2014) remains in place and applies to the project. The Planning Agreement outlines Preliminary Conservation Objectives for the ECMSCP and identifies an interim project review process, including a set of preserve design principles that interim projects would be evaluated against while the ECMSCP is in preparation.

4.2 County Resource Protection Ordinance

The County's Resource Protection Ordinance regulates biological and other natural resources within the County. These resources include wetlands, wetland buffers, floodways, floodplain fringe, steep slope lands, sensitive habitat lands, and significant prehistoric or historic sites. Generally, the ordinance stipulates that no impacts may occur to wetlands except for scientific research; removal of diseased or invasive exotic plant species; wetland creation and habitat restoration; revegetation and management projects; and crossings of wetlands for roads, driveways, or trails/pathways when certain conditions are met. The same exemptions apply to impacts to wetland buffer areas and improvements necessary to protect adjacent wetlands. Sensitive habitat lands are unique vegetation communities and support sensitive species, lands essential to the healthy functioning of a balanced natural ecosystem, or wildlife corridors. Impacts to sensitive habitat lands are permitted when impacts have been reduced as much as possible and mitigation provides at least an equal benefit to the affected species (County of San Diego 2012).

4.3 Local

The study area is located within the County's Borrego Springs Community Planning Area and has been designated as rural residential.

5 Impacts Analysis and Recommendations

This section addresses potential impacts to special-status biological resources that could result from implementation of the proposed project. This section follows the CEQA checklist for biological resources. For the purposes of this biological analysis, it is assumed that the entire project site would be permanently impacted (Figure 5, Impacts). It is also assumed that all construction activities will be contained within the project site and no off-site impacts are anticipated.

5.1 Special-status Vegetation Communities

No CDFW special-status vegetation communities occur in the study area; however, the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements* (County of San Diego 2010) lists vegetation communities that they consider special-status. These communities require compensatory mitigation for impacts to land outside the Multiple Species Conservation Program (MSCP). As the proposed project falls outside of the MSCP, impacts to the Sonoran Creosote Bush Scrub vegetation community (the Holland vegetation type that cross-walks to Creosote bush-allscale scrub association) requires a 1:1 mitigation ratio per the County of San Diego. Impacts to special-status vegetation would be significant absent mitigation. Implementation of MM-BIO-1 would reduce impacts to special-status vegetation to less than significant.

Table 2 lists impacts to the land covers found on the project site.

Table 2. Project Impacts to Vegetation Communities and Land Covers within the Study Area

Vegetation Community/Land Cover	Existing Acreage	Impact Acreage	Mitigation Ratio	Required Mitigation
Vegetation Communities				
Creosote bush–allscale scrub association	6.59	6.59	1:1	6.59
Non-natural Land Covers				
Urban/developed	--	--	N/A	--
	Total[1]	**6.59**	**—**	**6.59**

[1] Totals may not add due to rounding.

5.2 Special-Status Plants

As described under Section 3.6, one non-listed, special-status plant species has a moderate potential to occur within the study area and has potential to occur within the impact area: California ayenia. This species was not observed within the study area during focused spring surveys (See Attachment G).

Therefor no special-status plant species are expected to be directly or indirectly impacted during project construction. Therefore, impacts to special-status plants are less than significant.

5.3 Special-Status Wildlife

As described under Section 3.7, three non-listed special-status wildlife species have a moderate potential to occur within the study area: loggerhead shrike, ferruginous hawk, and prairie falcon. Additionally, burrowing owl has a low potential to occur. While species with low potential to occur are not typically analyzed, burrowing owl is regionally sensitive and therefore warrants additional considerations. None of these species were observed within the study area; however, the reconnaissance survey did not include focused surveys for these species.

Special-status wildlife species could be directly and indirectly impacted during project construction. Potential direct impacts could include removal of individuals, removal of occupied habitat, and other changes in the microhabitats that support loggerhead shrike, ferruginous hawk, and prairie falcon. Potential indirect impacts to special-status wildlife resulting from construction and implementation activities include the generation of fugitive dust, the release of chemical pollutants, and short-term increased human activity. Impacts to special-status wildlife would be significant absent mitigation. Implementation of MM-BIO-4 and MM-BIO-5 would reduce impacts to special-status wildlife to less than significant.

5.3.1 Burrowing Owl

While burrowing owl was determined to have a low potential to occur within the study area due to absence of suitable burrows, this species is known to occur within the vicinity of the project and has potential to use the

site for foraging. If burrowing owl should occupy the site prior to initiation of construction activities, direct impacts to burrowing owl would be significant. Additionally, if burrowing owl occupy surrounding habitat within 500 feet of construction activities, indirect impacts could be significant. Burrowing owl is protected under the Migratory Bird Treaty Act and the California Fish and Game Code (Section 3516) protecting nesting birds; therefore, a pre-construction burrowing owl survey is recommended (MM-BIO-4).

5.3.2 Nesting Birds

Project construction could result in direct and indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings if ground-disturbing activities occur during the nesting season (generally February 1 through August 31). Construction activities during this time may result in reduced reproductive success and may violate the California Fish and Game Code. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities. If nesting birds are observed within or adjacent to the construction activities, avoidance of active bird nests should occur as determined by the qualified biologist to ensure compliance with these regulations. With implementation of MM-BIO-5, no significant impacts to nesting birds would occur.

5.4 Jurisdictional Waters

The proposed project site does not contain jurisdictional waters; therefore, the proposed project would not result in impacts to this resource.

5.5 Wildlife Corridors and Nursery Sites

The project site does not function as a wildlife corridor because it is located in a relatively open landscape that is unconstrained by impediments to wildlife movement. The project surroundings contain open space that can continue to facilitate wildlife movement and habitat connectivity with implementation of the proposed project. Additionally, the proposed project site does not contain habitat suitable for supporting nursery sites. As a result, implementation of the proposed project would not result in impacts to wildlife movement or nursery sites.

5.6 Habitat Conservation Plans

The project site is not located within an active habitat conservation plan and would not preclude the design or implementation of the East County MSCP once restarted. As a result, implementation of the proposed project would not result in impacts to these resources.

5.7 Other Local Ordinances

There are no other biology-related local ordinances that would affect the project.

5.8 Cumulative Impacts

A review of recently approved or probable projects within one mile and 10 miles of the study area were analyzed for their potential to cumulatively affect the potential species present on site. These radii were chosen due to the

size and projected home ranges of the species that might be affected by this project. The County researched their records and there are 12 projects within 10 miles of the project site, three of which are within 1 mile of the study area. Of the 12 projects, three contained biological impacts and are included within the cumulative analysis. See Table 3 for projects considered in the cumulative analysis.

Of the three projects with biological impacts, one contained potential impacts a special-status wildlife species: flat-tailed horned lizard. In order for a cumulative impact to special-status wildlife species to occur, the cumulative projects would have to result in the loss of the same special-status species or their habitat as the Proposed Project such that those species become more limited in their distribution, population size, or available suitable habitat within the cumulative analysis area. Construction of the proposed project would result in the potential direct loss of special-status wildlife species, indirect effects to special-status wildlife species, and the loss of suitable habitat for special-status wildlife species. However, implementation of mitigation measures would reduce potentially significant impacts to special-status species to less than significant. Additionally, there is abundant habitat present for the species that have potential to occur on the project site and the distance between the proposed project and the project analyzed for the cumulative analysis are a beyond the possibility of genetic connections. As such, cumulative impacts to special-status species would be less than significant.

All three projects with biological impacts contain impacts to vegetation communities. The proposed project would impact 6.6 acres of vegetation communities and land covers. Many of the vegetation communities impacted by the proposed project are similar to those impacted by other cumulative projects in the region. The proposed project's impacts to vegetation communities and the impacts to vegetation communities within the three projects together are representative of less than 0.01% of the cumulative analysis 10-mile radius study area. Vegetation communities would not become limited in acreage or extent within the cumulative analysis area and cumulative impacts to native vegetation communities would be less than significant.

Table 3. Other Projects within 10 Miles of the Study Area

PDS number	Project	Cumulative issue?	Native habitat impact	Species Issues
PDS2006-3000-06-015	Entry gate remodel	No	No	No
PDS2015-IC-15-015		Yes	Minor shrub removal	No
PDS2010-3300-10-033	cell tower	No	No	No
PDS2006-3200-21027	Bowen-Jonas Minor Subdivision;	Yes	39.19 acres of Sonoran creosote bush scrub	No
PDS2012-3301-09-012-01	Desert Green Solar Farm;	Yes	64 acres of desert saltbush scrub	Flat-tailed horned lizard
PDS2016-MUP-79-130W2M6	Rams-Hill Gold Club Canopy;	No	No	No
PDS2015-AD-07-037M1	Rams Hill Road	No	No	No
PDS2016-LDGRMN-20116	Golf Cottages	No	No Info	No Info

Table 3. Other Projects within 10 Miles of the Study Area

PDS number	Project	Cumulative issue?	Native habitat impact	Species Issues
PDS2016-IC-16-057	Corrizos remapping	No	No	No
PDS2008-2140-5373	Maj Subdivision Improvement Plan	No	No Info	No Info
PDS2008-2700-15440	RV Park	No	No Info	No Info
PDS2014-LDGRMJ-00016	SFD lots	No	No Info	No Info

6 Avoidance, Minimization, and Mitigation Measures

The following measures are recommended to avoid, minimize and/or mitigate for impacts to special-status resources.

MM-BIO-1 Compensatory Mitigation

Per the County guidelines (County of San Diego 2010), impacts to creosote bush–allscale scrub association require mitigation at a 1:1 ratio for a total of 6.6 acres of required mitigation. There are no opportunities for on-site mitigation. Therefore, 6.6 acres of creosote bush–allscale scrub (or similar vegetation) will be preserved off site. Mitigation for the loss of suitable habitat for special-status plants and loss of habitat for special-status wildlife species will also include off-site preservation of 6.6 acres of suitable habitat.

Preservation of off-site open space shall be provided through one of the purchase of mitigation credits at an appropriate mitigation banking entity (e.g., Anza Borrego Land Trust) as approved by the County.

MM-BIO-2 General Avoidance and Minimization Measures

The following avoidance and minimization measures shall be implemented during project construction activities.

- Construction limits along the northern boundary of the project shall be clearly flagged so that adjacent native vegetation is avoided.
- Construction work and operations and maintenance areas shall be kept clean of debris, such as trash and construction materials. Fully covered trash receptacles that are animal-proof will be installed and used during construction to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles will be removed at least once a week from the proposed project site.
- Nighttime construction should be minimized to the extent possible. However, if nighttime activity (e.g., equipment maintenance) is necessary, then the speed limit shall be 10 mph.
- Staging and storage areas for spoils, equipment, materials, fuels, lubricants, and solvents shall be located within the designated impact area or adjacent developed areas.

- To prevent inadvertent entrapment of special-status wildlife during construction, all excavated steep-walled holes or trenches more than 2 feet deep shall be covered with plywood or similar materials at the close of each working day, or be provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped wildlife. If trapped animals are observed, escape ramps or structures shall be installed immediately to allow escape.
- All pipes, culverts, or similar structures with a diameter of 4 inches or more that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for special-status wildlife or nesting birds before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If an animal is discovered inside a pipe, that section of pipe shall not be moved until the animal has either moved from the structure on its own accord or until the animal has been captured and relocated by a qualified biologist.

The following avoidance and minimization measure shall be implemented as part of project operations:

- The project landscape plan shall avoid the use of any invasive, non-native plant species rated as "high" or "moderate" by the California Invasive Plant Council's Invasive Plant Inventory (Cal-IPC 2020).

MM-BIO-3 Burrowing Owl

Two pre-construction surveys for burrowing owl shall be completed by a qualified biologist in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012), with the first survey no less than 14 days prior to initiation of project-related activities, and the second within 24 hours of project-related activities. If an active burrowing owl burrow is detected within 500 feet of the project site, a qualified biologist shall implement avoidance and minimization measures in accordance with the CDFW 2012 guidelines, including implementation on a non-disturbance buffer and monitoring of the nest to ensure activities are not adversely affecting the nest. If it is determined that an active burrow must be impacted, then a Burrowing Owl Management Plan will be written and approved by the County.

MM-BIO-4: To maintain compliance with the Migratory Bird Treaty Act and Fish and Game Code, if ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within the project footprint and a 300-foot buffer around the project footprint. Surveys shall be conducted within 3 days prior to initiation of activity and will be conducted between dawn and noon.

If an active nest is detected during the pre-construction survey, avoidance buffers shall be implemented as determined by a qualified biologist. The buffer will be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests will be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned.

7 Conclusion

The proposed project contains suitable habitat for three special-status species: loggerhead shrike, ferruginous hawk, and prairie falcon.

If you have any questions regarding this biological resources assessment, please feel free to contact me at bortega@dudek.com or 760.479.4254, or Anna Cassady at acassady@dudek.com or 951.300.1088.

Sincerely,

Brock Ortega
Senior Wildlife Biologist

Att.: *Attachment A – Figures*
Attachment B – Site Photographs
Attachment C – Vascular Plant Species
Attachment D – Wildlife Species
Attachment E – Special-Status Plant Species Detected or Potentially Occurring in the Study Area
Attachment F – Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area
Attachment G – Focused Special-status Plant Survey Results Letter Report for the Casa Del Zorro Project

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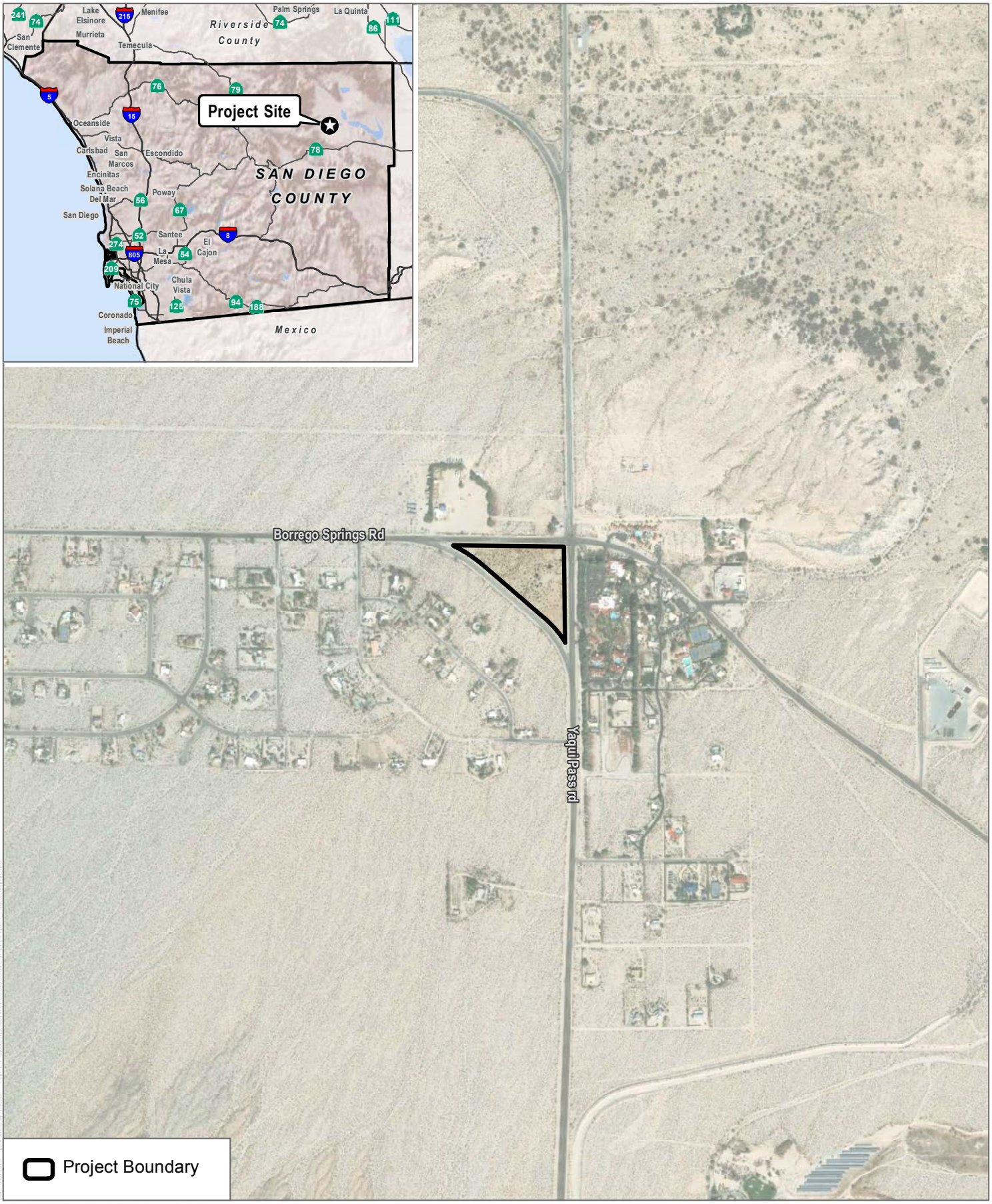
Attachment A

Figures



SOURCE: USGS 7.5-Minute Series Borrego Sink Quadrangle

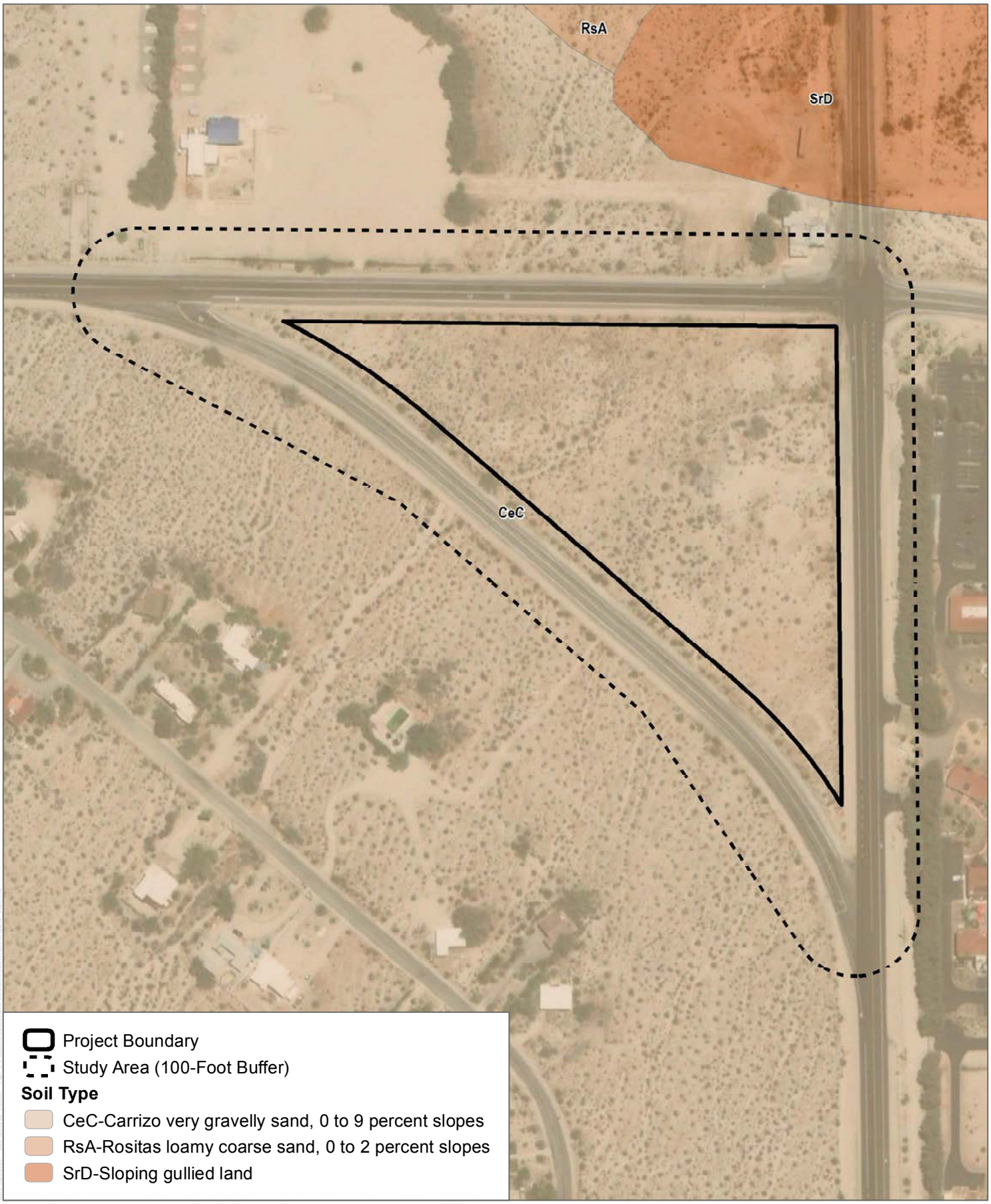
DUDEK

0 500 1,000 Feet
0 140 280 Meters
1:12,000

FIGURE 1

Project Location

Casa Del Zorro



SOURCE: Bing Maps 2018; USDA 2016

DUDEK

0 125 250 Feet

FIGURE 2

Soils

Casa Del Zorro Project

SOURCE: Bing Maps 2018

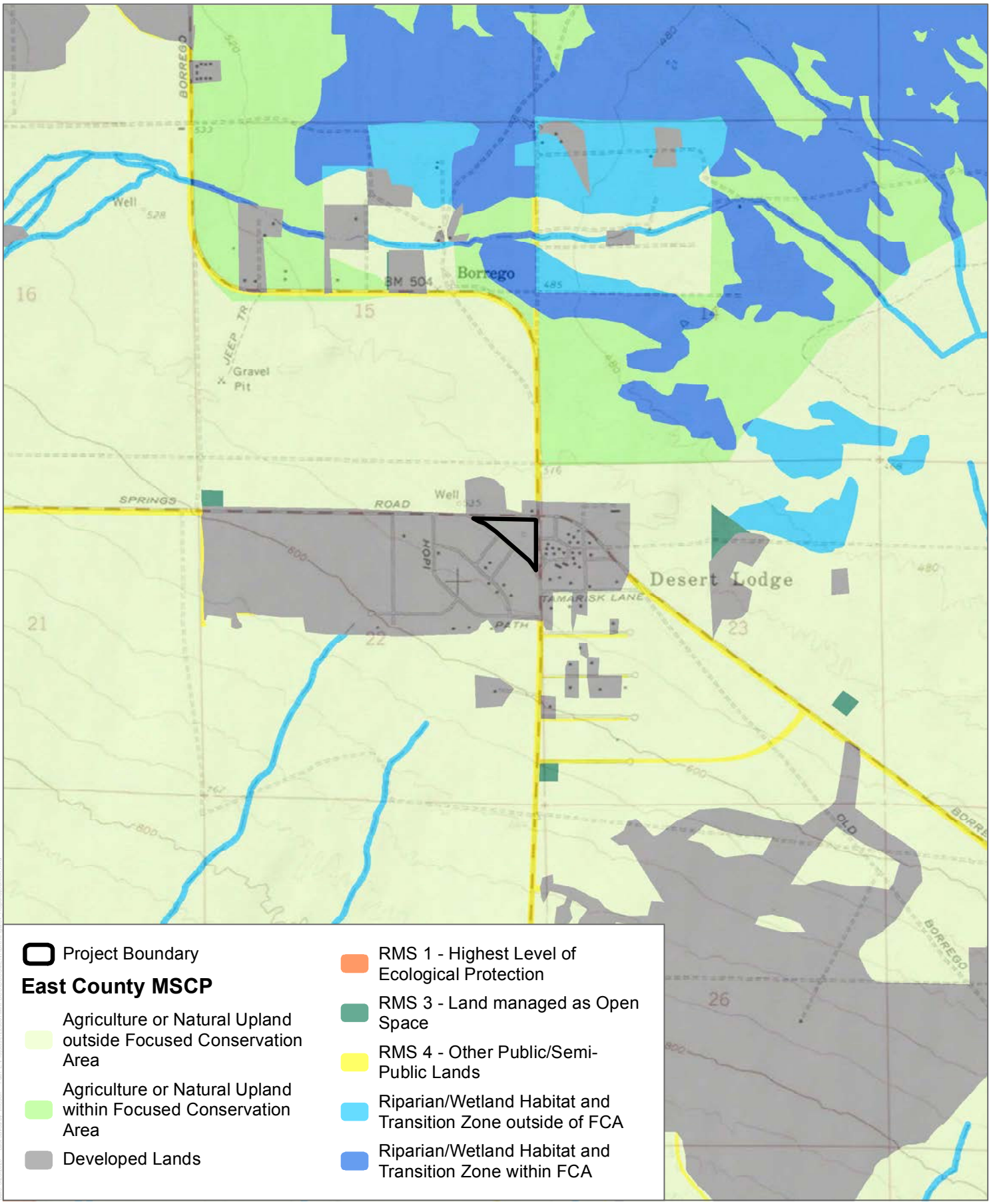
DUDEK

0 125 250 Feet

FIGURE 3

Biological Resources

Casa Del Zorro Project



SOURCE: USGS 7.5-Minute Series Borrego Sink Quadrangle, SANDAG 2019

DUDEK

0 1,000 2,000 Feet
0 285 570 Meters
1:24,000

FIGURE 4

Regional Context

Casa Del Zorro

SOURCE: Bing Maps 2018

DUDEK

0 125 250 Feet

FIGURE 5

Proposed Impacts to Biological Resources

Casa Del Zorro Project

Attachment B

Site Photographs

Photo 1: View of the project site from the western corner along Borrego Springs Road, facing east.

Photo 2: View of compacted soils in the central portion of the project site, facing north.

Photo 3: View of creosote bush-allscale scrub association vegetation community, facing east.

Photo 4: View of ephemeral drainage within project buffer on west side of Deep Well Trail, facing southwest.

Photo 5: View of southeastern portion of the project site, facing north.

Photo 6: View of sparse vegetation throughout the project site, facing northeast.

Photo 7: View of creosote bush-allscale scrub association vegetation community within central portion of study area, facing east.

Photo 8: View of southern portion of study area, facing west.

Photo 9: View of erosional feature within project site that captures road runoff from Deep Well Trail, facing north.

Photo 10: Continuation of erosional feature where it begins to lose sign of its OHWM before it dissipates, facing north.

Attachment C

Vascular Plant Species

EUDICOTS

VASCULAR SPECIES

ASTERACEAE—SUNFLOWER FAMILY

Ambrosia salsola—cheesebush
Encelia farinosa—brittle bush
Palafoxia arida—desert palafox

BORAGINACEAE—BORAGE FAMILY

Cryptantha intermedia—Clearwater cryptantha

BRASSICACEAE—MUSTARD FAMILY

* *Brassica tournefortii*—Tournefort's mustard
* *Sisymbrium irio*—London rocket

CACTACEAE—CACTUS FAMILY

Cylindropuntia echinocarpa—Wiggins' cholla
Cylindropuntia ramosissima—branched pencil cholla

CHENOPODIACEAE—GOOSEFOOT FAMILY

Atriplex polycarpa—allscale

EUPHORBIACEAE—SPURGE FAMILY

Euphorbia albomarginata—whitemargin sandmat

FABACEAE—LEGUME FAMILY

Parkinsonia florida—blue palo verde
Prosopis glandulosa—honey mesquite
Senegalia greggii—catclaw acacia

GERANIACEAE—GERANIUM FAMILY

* *Erodium cicutarium*—redstem stork's bill

ZYGOPHYLLACEAE—CALTROP FAMILY

Larrea tridentata—creosote bush

MONOCOTS

VASCULAR SPECIES

POACEAE—GRASS FAMILY

* Schismus barbatus—common Mediterranean grass

* signifies introduced (non-native) species

Attachment D

Wildlife Species

BIRD

BUSHTITS

AEGITHALIDAE—LONG-TAILED TITS AND BUSHTITS

Psaltriparus minimus—bushtit

FINCHES

FRINGILLIDAE—FRINGILLINE & CARDUELINE FINCHES AND ALLIES

Haemorhous mexicanus—house finch

NEW WORLD SPARROWS

PASSERELLIDAE—NEW WORLD SPARROWS

Amphispiza bilineata—black-throated sparrow

MAMMAL

HARES AND RABBITS

LEPORIDAE—HARES AND RABBITS

Lepus californicus—black-tailed jackrabbit

Sylvilagus audubonii—desert cottontail

REPTILE

LIZARDS

PHRYNOSOMATIDAE—IGUANID LIZARDS

Uta stansburiana—common side-blotched lizard

Attachment E

Special-Status Plant Species Detected or Potentially Occurring in the Study Area

Scientific Name	Common Name	Status[1] (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur[2]
Astragalus insularis var. *harwoodii*	Harwood's milk-vetch	None/None/2B.2	Desert dunes, Mojavean desert scrub; sandy or gravelly/annual herb/Jan–May/0–2330	Low potential to occur. Suitable desert scrub habitat is present within the study area; however, the nearest documented occurrence is over 14 miles southeast (CDFW 2019). Harwood's milk-vetch is more typically found within sandy washes containing desert lavender (Hyptis emoryi) and smoke tree (Psosothamnus spinosa) (Reiser 2001). Desert lavender and smoke tree are typical of an established channel unlike the small washes found within the study area.
Astragalus magdalenae var. *peirsonii*	Peirson's milk-vetch	FT/SE/1B.2	Desert dunes/perennial herb/Dec–Apr/195–740	Not expected to occur. The nearest documented occurrence is approximately 3 miles northeast (CDFW 2019). Peirson's milk-vetch is found in well-developed dunes typical of the Algodones dune system east of El Centro in Imperial county (Reiser 2001). The study area does not have any dune habitat.

Scientific Name	Common Name	Status[1] (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur[2]
Ayenia compacta	California ayenia	None/None/2B.3	Mojavean desert scrub, Sonoran desert scrub; rocky/perennial herb/Mar–Apr/490–3595	Moderate potential to occur. Due to the inconspicuous nature of California ayenia, little is known or documented about the habitat for this species. One of the largest populations occurs near Hellhole canyon, around Hellhole canyon and scattered throughout Hellhole canyon (Reiser 2001). Due to the fact that Hellhole canyon is so close to the site and the site and contains one of the largest populations of California ayenia a thorough study of the site during the bloom period should be conducted.. The nearest documented occurrence is approximately 1.5 miles southwest of the study area (CDFW 2019).
Bursera microphylla	little-leaf elephant tree	None/None/2B.3	Sonoran desert scrub (rocky)/perennial deciduous tree/June–July/655–2295	Not expected to occur. The study area is outside of the species' known elevation range. In addition, little-leaf elephant tree is a large perennial shrub that would have been observed by Dudek biologists during the initial site visit.

Scientific Name	Common Name	Status[1] (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur[2]
Carlowrightia arizonica	Arizona carlowrightia	None/None/2B.2	Sonoran desert scrub (sandy, granitic alluvium)/perennial deciduous shrub/Mar–May/935–1410	Not expected to occur. The study area is outside of the species' known elevation range. Arizona carlowrightia typically occurs on the edges of desert washes with desert lavender, California ayenia and chuparosa (Justicia californica) (Reiser 2001). Washes that support these species were not present within the study area.
Chaenactis carphoclinia var. *peirsonii*	Peirson's pincushion	None/None/1B.3	Sonoran desert scrub (sandy)/annual herb/Mar–Apr/5–1640	Moderate potential to occur. Suitable desert scrub habitat is present within the study area, and the nearest documented occurrence is approximately 2.9 miles northwest (CDFW 2019). Peirson's pincushion is typically associated with creosote (Larrea tridentata) and found in broken rocky substrate and poorly developed soils (Reiser 2001).
Colubrina californica	Las Animas colubrine	None/None/2B.3	Mojavean desert scrub, Sonoran desert scrub/perennial deciduous shrub/Apr–June/30–3280	Low potential to occur. Suitable desert scrub habitat is present within the study area; however, the nearest documented occurrence is approximately 44 miles northeast of the study area (CDFW 2019). Additionally, this species is a perennial shrub that would have been observed, if present, during the site visit conducted in October 2019.
Selaginella eremophila	desert spike-moss	None/None/2B.2	Chaparral, Sonoran desert scrub (gravelly or rocky)/perennial rhizomatous herb/(May)June(July)/655–4250	Not expected to occur. The study area is outside of the species' known elevation range.
Senna covesii	Coves' cassia	None/None/2B.2	Sonoran desert scrub; Dry, sandy desert washes and slopes/perennial herb/Mar–June(Aug)/735–4250	Not expected to occur. The study area is outside of the species' known elevation range. Coves' cassia has not been documented within the Borrego Valley eco-region (San Diego Plant Atlas 2019).

Notes:
[1] Status abbreviations:
FE: Federally listed as endangered
FT: Federally listed as threatened
SE: State listed as endangered
SR: State Rare

CRPR List 1A: Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere
CRPR List 1B: Plants Rare, Threatened, or Endangered in California and Elsewhere
CRPR List 2A: Plants Presumed Extirpated in California, But More Common Elsewhere
CRPR List 2B: Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
.1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
.3 Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

[2] Refers to records within the Borrego Sink USGS 7.5-minute quadrangle (quad) and the eight surrounding quads (i.e., Borrego Palm Canyon, Clark Lake, Fonts Point, Tubb Canyon, Borrego Mountain, Earthquake Valley, Whale Peak, Harper Canyon).

References:

CDFW (California Department of Fish and Wildlife). 2019. *RareFind*, Version 5.2.14. California Natural Diversity Database (CNDDB). Accessed October 2019. https://apps.wildlife.ca.gov/rarefind/view/RareFind.aspx

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San Diego Plant Atlas. 2019. Accessed October 2019.http://www.sdplantatlas.org/.

Attachment F

Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area

Scientific Name	Common Name	Status[1] (Federal/State)	Habitat	Potential to Occur[2]
Birds				
Buteo regalis (wintering)	ferruginous hawk	BCC/WL	Winters and forages in open, dry country, grasslands, open fields, agriculture	Moderate potential to occur. The study area contains suitable open, desert scrub vegetation that could support the foraging of this species.
Buteo swainsoni (wintering)	Swainson's hawk	BCC/ST	Nests in open woodland and savanna, riparian, and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields and pasture	Not expected to occur. The study area does not contain isolated large trees that would support the wintering of this species, nor does it support grasslands or agricultural fields that would support the foraging of this species.
Falco mexicanus	prairie falcon	BCC/WL	Forages in grassland, savanna, rangeland, agriculture, desert scrub, alpine meadows; nest on cliffs or bluffs	Moderate potential to occur. The study area contains suitable open, desert scrub vegetation that could support the foraging of this species.
Lanius ludovicianus (nesting)	loggerhead shrike	BCC/SSC	Nests and forages in open habitats with scattered shrubs, trees, or other perches	Moderate potential to occur. The study area contains open desert scrub vegetation that could provide suitable nesting and foraging habitat for this species. The nearest CNDDB occurrence is located approximately 13.6 miles southeast of the study area. However, this species has been observed with moderate frequency (occurs on 10%-25% eBird lists) within the Borrego Sink USGS 7.5-minute quadrangle (CDFW 2019a; eBird 2019).
Ovis canadensis nelsoni pop. 2 DPS	Peninsular bighorn sheep DPS	FE/FP, ST	Dry, rocky, low-elevation desert slopes, canyons, and washes; females near water during lambing season	Not expected to occur. The study area does not contain steep cliffs, rocky terrain, or alluvial fans that could support this species.

Notes:

[1] Status abbreviations:
- FE: Federally Endangered
- FT: Federally Threatened
- BCC: U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern
- SSC: California Department of Fish and Wildlife (CDFW) Species of Special Concern
- WL: CDFW Watch List Species
- FP: CDFW Fully Protected Species
- SE: State Endangered

ST: State Threatened

[2] Refers to records within the Borrego Sink 7.5-minute quadrangle (quad) and the eight surrounding quadrangles (Borrego Palm Canyon, Clark Lake, Fonts Point, Tubb Canyon, Borrego Mountain, Earthquake Valley, Whale Peak, Harper Canyon).

References:

CDFW (California Department of Fish and Wildlife). 2019. *RareFind*, Version 5.2.14. California Natural Diversity Database (CNDDB). Accessed October 2019. https://map.dfg.ca.gov/rarefind/view/RareFind.aspx.

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Attachment G

Focused Special-status Plant Survey Results Letter Report for the Casa Del Zorro Project

3544 UNIVERSITY AVENUE
RIVERSIDE, CALIFORNIA 92501
T 951.300.2100 F 951.300.2105

April 15, 2020 12258

Jim Kelly
SD Renewables
4747 Executive Drive, Suite 201
San Diego, California 92121

Subject: Focused Special-Status Plant Survey Results Letter Report for the Casa Del Zorro Project (PDS2019-AD-19-028), Borrego Springs, San Diego County, California

Dear Mr. Kelly:

Dudek conducted a focused special-status plant survey for the Casa Del Zorro Project (Project). The approximately 6.6-acre project site is located in the unincorporated community of Borrego Springs, San Diego County (Figure 1, Dudek 2020). The study area for the survey included the proposed permanent impact area plus a 100-foot buffer, totaling 18.4 acres.

A *Biological Resources Assessment Report* (BRA, Dudek 2020) for the Project was prepared by Dudek in 2020, which included measures to avoid and minimize potential impacts to biological resources. In order to reduce impacts to special-status plants to less than significant under the California Environmental Quality Act (CEQA), Biological Mitigation Measure (MM-BIO)-3 recommended focused surveys for California ayenia (*Ayenia compacta*) at the appropriate time of the year and in appropriate conditions prior to construction. This letter report provides the methods and results of the focused special-status plant survey for California ayenia.

1 Project Description and Location

The proposed project involves approximately 800 kilovolts of renewable solar generation within the 6.6-acre project site and is located approximately 5.25 miles northwest of State Route 78 and 21.3 miles southeast of the Salton Sea. More specifically, the project site is located within the unincorporated community of Borrego Springs in San Diego County, south of Borrego Springs Road, west of Yaqui Pass Road, and northeast of Deep Well Trail (Figure 1, Dudek 2020). The project occurs within Section 22, Township 11 South, and Range 6 East of the U.S. Geological Survey (USGS) Borrego Sink 7.5-minute quadrangle. The approximate center of the site corresponds to latitude 32.21° north and longitude 116.33° west.

2 Site Description

The project site is characterized as undeveloped land and is bounded by Borrego Springs Road to the north, Yaqui Pass Road to the east, and Deep Well Trail to the southwest. The study area includes a mix of undeveloped land to the northeast and southwest, as well as development comprised of La Casa del Zorro Resort and Spa to the east, a vacant gas station to the north, and an American Legion Post to the northwest. Elevations on site range from approximately 510 to 540 feet above sea level. Representative photographs of the project site are included in Attachment B of the BRA.

One soil series type, Carrizo very gravelly sand, 0%-9% slopes, is mapped within the study area.

Vegetation communities and land covers within the study area include creosote bush-allscale saltbush scrub and developed land (Figure 3, Dudek 2020).

3 California Ayenia

California ayenia (*Ayenia compacta*) is a California Rare Plant Rank (CRPR) 2B.3 species, indicating the species is rare, threatened or endangered in California, but more common elsewhere. It is perennial herb or shrub native to California, Arizona, and Baja California, where it occurs in sandy washes and dry rocky canyons. The species is associated with Mojavean desert scrub and Sonoran desert scrub and occurs at elevations between 490 and 3,595 feet above mean sea level (amsl). California ayenia typically blooms between March and April and can be identified by its distinct spheric fruit, when present (CNPS 2020)

California ayenia is cryptic in nature and can be difficult to observe outside the bloom period. This species has a moderate potential to occur in the study area due to the suitable soil substrate, habitat association, elevation, and known range. Additionally, one of the largest known populations occurs in and around Hellhole Canyon (Dudek 2020), which is located approximately 6 miles northwest of the Project site. The nearest documented occurrence is approximately 1.5 miles southwest of the study area.

4 Methods

4.1 Reference Population Check

Plant species bloom at slightly different times each year depending on temperature, rainfall patterns, elevation, and other environmental factors. Reference population checks involve locating populations of target species during a time frame when they are known to be blooming or exhibiting other phenological characteristics that allow for species identification. Observations of reference populations during peak phenology provide assurance that these species would be identifiable if they were present in the study area. Based on communications with the Anza-Borrego Desert State Park Botany Society, California ayenia was observed in bloom within a canyon along Mine Wash within Anza Borrego State Park on April 5, 2020 (Fred Melgert, personal communication, April 5, 2020).

4.2 Focused Special-Status Plant Survey

Dudek Botanist Charles Adams conducted a focused special-status plant survey for California ayenia within the study area on April 6, 2020. Mr. Adams was on site from 9:00 a.m. to 1:35 p.m. under suitable weather conditions (62°F–69°F, 0–9 mile-per-hour winds, and partly cloudy skies). Surveys for special-status species were conducted within the study area by walking transects within the entire study area, with the exception of areas classified as developed lands. Focused special-status plant surveys conformed to California Native Plant Society Botanical Survey Guidelines (CNPS 2001), Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities (CDFG 2009), and U.S. Fish and Wildlife Services General Rare Plant Survey Guidelines (Cypher 2002).

All plant species encountered during the field surveys were identified to subspecies or variety, if applicable, to determine sensitivity status. Moreover, all plant species encountered in the field were recorded. Latin and common names for plant species with a CRPR (formerly California Native Plant Society List) follow the California Native Plant Society Online Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2020). For plant species without a CRPR, Latin names follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2020) and common names follow the California Natural Community list (CDFW 2018) or the U.S. Department of Agriculture Natural Resources Conservation Service Plants Database (USDA 2020).

4.3 Survey Limitations

There were no factors that would have limited the results of the focused survey for its intended use to confirm presence/absence of California ayenia. The focused special-status plant survey for California ayenia was conducted in April 2020. The timing of the survey coincided with the blooming period for this target species. A reference population was confirmed in bloom on April 5, 2020, confirming this species would have been identifiable if present within the study area. Additionally, all special-status species, including federally or state listed or CRPR 1 through 4 species, would have been mapped if observed.

All surveys were conducted during daylight hours under weather conditions that did not preclude observation of special-status plant species (e.g., surveys were not conducted during heavy fog or rain).

5 Results of Survey

5.1 Floral Diversity

A total of 25 species of native or naturalized plants, 21 native (84%) and four (4) non-native (16%), were recorded within the study area (Attachment A, Plant Compendium). This low plant diversity reflects the study area's small size. In addition, portions of the study area are developed and absent of any vegetative cover.

5.2 Special-Status Plant Species

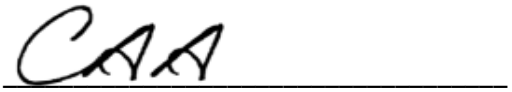
The focused special-status survey for California ayenia was negative. Additionally, no federally or state listed or non-listed CRPR 1-4s were incidentally observed during the focused survey on April 6, 2020.

6 Discussion

The focused special-status plant survey for California ayenia was negative; therefore, no further action or mitigation is required.

If you have any questions regarding this letter report, please feel free to contact me at cadams@dudek.com or 760.479.4177.

Sincerely,



Charles Adams
Biologist

Att.: Attachment A – Plant Compendium
cc: Brock Ortega, Dudek

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Attachment A

Plant Compendium

Eudicots

Vascular Species

ASTERACEAE—SUNFLOWER FAMILY

Ambrosia salsola—cheesebush
Chaenactis stevioides—desert pincushion
Encelia farinosa—brittle bush
Malacothrix glabrata—desert dandelion
Rafinesquia neomexicana—desert chicory
Palafoxia arida—desert palafox

BORAGINACEAE—BORAGE FAMILY

Cryptantha angustifolia—Narrow leaved cryptantha
Phacelia distans—Distant phacelia

BRASSICACEAE—MUSTARD FAMILY

* *Brassica tournefortii*—Tournefort's mustard
* *Sisymbrium irio*—London rocket

CACTACEAE—CACTUS FAMILY

Cylindropuntia echinocarpa—Wiggins' cholla
Cylindropuntia ganderi—Gander's cholla
Cylindropuntia ramosissima—branched pencil cholla
Ferocactus cylindraceus—California barrel cactus

CHENOPODIACEAE—GOOSEFOOT FAMILY

Atriplex polycarpa—allscale

EUPHORBIACEAE—SPURGE FAMILY

Euphorbia albomarginata—whitemargin sandmat

FABACEAE—LEGUME FAMILY

Parkinsonia florida—blue palo verde
Prosopis glandulosa—honey mesquite
Senegalia greggii—catclaw acacia

GERANIACEAE—GERANIUM FAMILY

* *Erodium cicutarium*—Common stork's bill

ONAGRACEAE—EVENING PRIMROSE FAMILY

Chylismia claviformis ssp. *peirsonii*—Peirson's clavate fruited primrose

Eulobus californicus—California suncup

PLANTAGINACEAE—PLANTAIN FAMILY

Plantago ovata—desert Indianwheat

ZYGOPHYLLACEAE—CALTROP FAMILY

Larrea tridentata—creosote bush

Monocots

Vascular Species

POACEAE—GRASS FAMILY

* *Schismus barbatus*—common Mediterranean grass

* signifies introduced (non-native) species