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August 1, 2018 HMC-10

Mr. Sean Santa Cruz
Hall Land Company, Inc.
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Solana Beach, CA 92075

Subject: Biological Resources Letter Report for the 1118 N. Anza Street Townhomes Project (APNs 484-092-33, 484-092-31, 484-092-35, 484-291-01, and 484-092-34), PDS2018-TM-5628/REZ-18-003

Dear Mr. Santa Cruz:

At the request of Hall Land Company, Inc. (Applicant) and the County of San Diego Planning & Development Services (County), HELIX Environmental Planning, Inc. (HELIX) has completed this biological resources letter report for the 1118 N. Anza Street Townhomes Project, Record ID PDS2018-TM-5628/REZ-18-003 (project), which is proposed in the Lakeside Community Plan area of unincorporated San Diego County, California. The project proposes to develop 39 units in a 4-plex, 6-plex, and 7-plex building configuration with associated parking and infrastructure.

The purpose of this report is to document the existing biological conditions within the project site and provide analysis of potential impacts to sensitive biological resources with respect to local, state, and federal policy. This report provides the biological resources technical documentation necessary for review under the California Environmental Quality Act (CEQA) by the County and other responsible agencies for the project. Figures and other supporting information are provided as enclosures attached to this letter report.

SUMMARY

The proposed project is a residential housing development with associated parking and infrastructure on an infill site that supports existing residences. The approximately 3.18-acre project site is located on North Anza Street in unincorporated El Cajon, in the Lakeside Community Planning Area. The project site supports 2.15 acres of disturbed habitat and 1.03 acres of developed land. No sensitive plant or animal species were observed or expected to occur on site. The project's only significant biological impact would be the potential for impacts to nesting migratory birds or raptors if the project were to grade or clear during the breeding season. The project will be conditioned for breeding season avoidance to

prevent any impact to nesting birds. The project would have no other significant impacts and no other mitigation would be required.

INTRODUCTION, PROJECT DESCRIPTION, LOCATION, AND SETTING

Project Description

The project would consist of the construction of 39 units in a 4-plex, 6-plex, and 7-plex building configuration. The site would be accessed by two proposed roads connecting to North Anza Street. The entire site would be developed. Two biofiltration basins would be located on the eastern edge of the site adjacent to north Anza Street. The project would include three recreational open space areas located in the northwest and southeast corners of the project site. There is no fire clearing requirement for the project beyond landscaping the site with approved drought-tolerant species.

Location

The project site is generally located north of Interstate 8 and east of State Route 67, in El Cajon, in the Lakeside Community Planning Area of unincorporated San Diego County, California (Figure 1). The site is depicted within unsectioned land on the El Cajon U.S. Geological Survey 7.5-minute topographic quadrangle map, on the west side of North Anza Street, north of Broadway and south of Greenfield Drive (Figure 2). Specifically, the project site consists of five residential parcels (Figure 3). The project site is currently surrounded by development on all sides including a road to the east, residential housing to the north and south, and a church and apartments to the west.

Literature Review

Prior to conducting the biological field survey in 2018, HELIX conducted a search of the California Natural Diversity Database (CNDDB; California Department of Fish and Wildlife [CDFW] 2018) for information regarding sensitive species known to occur within five miles of the project site, as well as a review of U.S. Fish and Wildlife (USFWS) and SanBIOS sensitive species databases (U.S. Fish and Wildlife Service [USFWS] 2018, County of San Diego [County] 2018, respectively).

General Biological Survey

A general biological survey of the project site was conducted by HELIX biologist Laura Moreton on March 15, 2018. Vegetation within the project site, as well as a 100-foot buffer around the site, was mapped on a 1"=40' scale aerial photo. A minimum mapping unit size of 0.10 acre was used when mapping upland habitat; 0.01 acre is used when mapping wetland and riparian habitat. The project site was surveyed on foot and with the aid of binoculars. Representative photographs of the site were taken, with select photographs included in this report as Attachment E. Plant and animal species observed or otherwise detected were recorded in field notebooks and are listed in Attachments A and B. Animal identifications were made in the field by direct, visual observation or indirectly by detection of calls, burrows, tracks, or scat. Plant identifications were made in the field or in the lab through comparison with photographs and reference documents. The project site was examined for evidence of potential jurisdictional waters and wetlands, including vernal pools.

Jurisdictional Delineation

Prior to beginning fieldwork, aerial photographs (1"=40' scale), topographic maps (1"=300' scale), and National Wetlands Inventory (NWI) maps were reviewed to assist in determining the presence or absence of potential jurisdictional areas in the project site. During the general biology survey, the site was surveyed to identify any potential water and wetland resources potentially subject to U.S. Army Corps of Engineers (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA; 33 USC 1344) and streambed habitats potentially subject to CDFW jurisdiction pursuant to Sections 1600 et seq. of the California Fish and Game Code (CFG Code). The survey was also conducted to determine the presence or absence of County Resource Protection Ordinance (RPO) wetlands. Areas generally characterized by potential depressions, drainage features, and riparian and wetland vegetation were evaluated.

The site was surveyed for potential USACE/Regional Water Quality Control Board (RWQCB)-jurisdictional waters of the U.S./State in accordance with the Wetlands Delineation Manual (Environmental Laboratory 1987) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (U.S. Army Corps of Engineers [USACE] 2008). Mapping of drainage features, if present, would be performed in the field based on the ordinary high water mark (OHWM) and surface indications of hydrology. Areas would be determined to be potential wetland waters of the U.S. if there was a dominance of hydrophytic vegetation, hydric soils, and wetland hydrology indicators. Areas would be determined to be potential non-wetland waters of the U.S. if there was evidence of regular surface flow within an OHWM, but the vegetation and/or soils criterion were not met.

The site was surveyed for potential CDFW-jurisdictional streambed and riparian habitat based on the presence of riparian vegetation or regular surface flow. Streambeds within CDFW jurisdiction would be delineated based on the definition of streambed as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports riparian vegetation" (Title 14, Section 1.72). Potential CDFW jurisdictional unvegetated streambed would encompasses the top-of-slope to top-of-slope width for ephemeral streams, if present within the project site.

Survey Limitations

Noted animal species were identified by direct observation, vocalizations, or the observance of scat, tracks, or other signs. However, the lists of species identified are not necessarily comprehensive accounts of all species that utilize the project site as species that are nocturnal, secretive, or seasonally restricted may not have been observed.

Nomenclature

Nomenclature used in this report generally comes from Holland (1986) and Oberbauer (2008) for vegetation; Baldwin et al. (2012) for plants; and American Ornithologists' Union (2017) for birds. Plant species status is from the California Native Plant Society (CNPS; 2018), CDFW (2018), and County (2010a). Animal species status is from CDFW (2017a and 2017b) and County (2010a).

REGIONAL CONTEXT

The project site is generally located within the Central Valley ecoregion of central San Diego County. Generalized climate in the region is regarded as Mediterranean, with warm dry summers and cold moist winters. Mean annual precipitation is approximately 12 inches, and the mean annual temperature is approximately 65 degrees Fahrenheit. The City of El Cajon experiences an average of 260 sunny days a year.

Important biological resources in the region include the Mission Trails Regional Park to the northwest of the project site, in addition to perennial waters and riparian habitat associated with the San Diego River to the north. In the context of the Multiple Species Conservation Program (MSCP), the project site is designated as Unincorporated Land in the Metro-Lakeside-Jamul Segment of the adopted Subarea Plan. General land uses in and surrounding the project site include commercial and residential (Figure 2).

Disturbance

The whole site has been disturbed in the past by human activities and is subject to ongoing regular disturbance associated with the existing residential usage, which have resulted in the site now supporting disturbed habitat and developed land (residential housing and maintained yards).

Topography and Soils

Elevation in the project site is approximately 450 feet above mean sea level (amsl). The project site is essentially flat. Two soil types have been mapped in the project site (Natural Resource Conservation Service [NRCS] 2018): Placentia sandy loam, thick surface, 2 to 9 percent slopes over most of the project site, and Vista coarse sandy loam, 5 to 9 percent slopes on the eastern edge of the site (Figure 4). One percent of the components of Placentia sandy loam are listed as hydric (NRCS 2018).

HABITATS/VEGETATION COMMUNITIES

Two vegetation communities/habitat types occur in the project site, as presented in Table 1 and shown on Figure 5. The numeric codes in parentheses following each community/habitat type name are from the Holland classification system (Holland 1986) and as added to by Oberbauer (2008) as presented in the County's Biology Guidelines (County 2010a). The communities/habitat types are presented in Table 1 in order by Holland code.

Table 1
VEGETATION COMMUNITIES/HABITAT TYPES

Vegetation Community/Habitat Type	On Site (Acres)
Disturbed Habitat (11300)	2.15
Urban/developed (12000)	1.03
TOTAL	**3.18**

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present human or animal usage that removes any capability of providing viable habitat. Disturbed habitat on site consists of the southern portion of the site and the northwestern portion of the site which was dominated by filaree (*Erodium* sps.) and other non-native species that are indicators of surface disturbance and soil compaction, including Russian thistle (*Salsola tragus*), cheeseweed (*Malva parviflora*), and Australian saltbush (*Atriplex semibaccata*). Grasses made up only 10 percent of the vegetative cover. Disturbed habitat covers approximately 2.15 acres of the site.

Urban/Developed

Urban/developed land includes areas that have been constructed upon or otherwise covered with a permanent, unnatural surface and may include, for example, structures, pavement, irrigated landscaping, or hardscape to the extent that no natural land is evident. These areas no longer support native or naturalized vegetation (County 2010b). Urban/developed land on site consists of the five single family homes currently on the site, including driveways and maintained landscaping. Urban/developed land covers 1.03 acres of the site.

Flora

HELIX identified a total of 31 plant species in the project site, of which 27 (87 percent) are non-native species (Attachment A).

Fauna

A total of six animal species were observed or otherwise detected in the project site during the biological survey, including five bird species and one mammal (Attachment B).

Sensitive Vegetation Communities/Habitat Types

Sensitive vegetation communities/habitat types are defined as land that supports unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants as defined by Section 15380 of the State CEQA Guidelines. No sensitive vegetation community/habitat types were mapped on the project site.

Special Status Species

Special Status Plant Species

Special status plant species have been afforded special status and/or recognition by the USFWS, CDFW, and/or the County and may also be included in the CNPS Inventory of Rare and Endangered Plants. Their status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as

those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread but exist naturally in small populations.

No special status plant species were observed in the project site, nor are any considered likely to occur within the project site (Attachment C).

Special Status Animal Species

Special status animal species include those that have been afforded special status and/or recognition by the USFWS, CDFW, and/or the County. In general, the principal reason an individual taxon (species or subspecies) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss.

No special status animal species have been observed or detected in the project site, nor do any considered likely to occur within the project site (Attachment D).

In the Major Pre-Application Letter dated May 7, 2018, the County requested a habitat assessment for Quino checkerspot butterfly (*Euphydryas editha quino*). The site consists entirely of disturbed and developed habitat completely surrounded by urban development, and none of this species' host plants were observed within the project site. This species is not likely to use the project site during its larval stage due to lack of host plants, nor does the site support its preferred nectar sources. Finally, the project site is not located within the USFWS survey area for this species. Therefore, the project site does not support suitable habitat for the Quino checkerspot butterfly.

Nesting Birds

Ornamental trees and plantings within the project site could provide suitable nesting habitat for bird species.

Raptor Foraging

The County (2010b) defines raptor foraging habitat as, "Land that is a minimum of 5 acres (not limited to project boundaries) of fallow or open areas with any evidence of foraging potential (i.e., burrows, raptor nests, etc.)." The habitat on, and contiguous with, the site does not qualify as raptor foraging habitat under this definition since it is less than five acres. Although the site is not foraging habitat for most raptors, species adapted to urban areas would have a moderate potential to use the site.

JURISDICTIONAL WETLANDS AND WATERWAYS

Waters of the U.S./Waters of the State

There were no USACE- and RWQCB-jurisdictional wetland or non-wetland Waters of the U.S./State observed on the project site.

Streambed and Riparian Habitat

No CDFW-jurisdictional streambed and riparian habitat was present on the project site.

Resource Protection Ordinance Wetlands

There are no areas within the project site that meet the criteria to be considered County Resource Protection Ordinance (RPO) wetlands (County 2011). The RPO defines wetlands as lands having one or more of the following attributes: (1) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) The substratum is predominantly undrained hydric soil; or (3) An ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system. In addition, lands that have one of those three attributes solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), are not considered wetlands provided that they:

1. Have negligible biological function or value as wetlands;
2. Are small and geographically isolated from other wetland systems;
3. Are not vernal pools; and,
4. Do not have substantial or locally important populations of wetland dependent sensitive species.

As stated above, no wetlands or potential wetlands were observed on site.

Vernal Pools

HELIX concluded that vernal pools and fairy shrimp do not occur on site for the following reasons: 1) the soil conditions on site do not support pool formation, 2) the site lacks vernal pool indicator species, 3) the site survey did not identify suitable depressions, and 4) review of aerial photography did not identify evidence of pools or road ruts.

OTHER UNIQUE FEATURES/RESOURCES

Habitat Connectivity and Wildlife Corridors

Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A corridor is a specific route that is used for the movement and migration of species and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat

areas. Many linkages occur as stepping-stone linkages that are made up of a fragmented archipelago arrangement of habitat over a linear distance.

The project site is surrounded by commercial and residential development and does not occur within any known corridors or linkages. The closest potential east-west corridor would be the San Diego River, approximately 2.8 miles to the north. The closest potential north-south movement area would likely be large parcels of open space approximately 2.9 miles to the east.

Topography, setting, soils, and raptor foraging are discussed elsewhere in this report. The project site does not include any hill-topping habitat, known roost sites, or rock outcroppings.

SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

Applicable Regulations

Biological resources in the project site are subject to regulatory review by federal, state, and local agencies. Under CEQA, impacts associated with a proposed project or program are assessed regarding significance criteria determined by the CEQA Lead Agency (in this case, the County) pursuant to CEQA Guidelines. Biological resources-related laws and regulations that apply to the proposed project include Migratory Bird Treaty Act (MBTA), CEQA, and CFG Code.

The County is the lead agency for the CEQA environmental review process in accordance with State law and local ordinances. During CEQA review, the County will be responsible for reviewing project issues per the Guidelines for Determining Significance for Biological Resources (County 2010a) and RPO. The CDFW is responsible for reviewing issues related to nesting birds and raptors pursuant to CFG Code.

Federal Government

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. The MBTA is used to place restrictions on disturbance of active bird nests during the nesting season (generally February 1 to August 31). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

State of California

California Environmental Quality Act

Primary environmental legislation in California is found in CEQA and its implementing guidelines (State CEQA Guidelines), which require that projects with potential adverse effects (or impacts) on the environment undergo environmental review. Adverse environmental impacts are typically mitigated because of the environmental review process in accordance with existing laws and regulations.

California Fish and Game Code

Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

County of San Diego

Resource Protection Ordinance

The County regulates sensitive biological habitats (among other resources) via the RPO (County 2011), the regulations of which cover wetlands, wetland buffers, and sensitive habitat lands. No wetlands or wetland buffers were present in the project site, as discussed above.

Sensitive Habitat Lands are defined by the RPO as:

- Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State CEQA Guidelines (14 Cal. Admin. Code Section 15000 et seq.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.
    - "Unique vegetation community" refers to associations of plant species which are rare or substantially depleted. These may contain rare or endangered species, but other species may be included because they are unusual or limited due to a number of factors, for example: (a) they are only found in the San Diego region; (b) they are a local representative of a species or association of species not generally found in San Diego County; or (c) they are outstanding examples of the community type as identified by the CDFW listing of community associations.

No portion of the project site would qualify as Sensitive Habitat Lands.

Analysis of Project Effects

Issue 1 – Special Status Species

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the USFWS or CDFW?

Effects Found Not to be Significant

The project would not result in significant impacts under the following guidelines:

A. The project would not impact one or more individuals of a species listed as federally or state endangered or threatened.

No federally or state endangered or threatened species are known or expected to occur within the project site (Attachment C and D). The project would have no impact on federally or state endangered or threatened species.

B. The project would not impact an on-site population of a County List A or B plant species, or a County Group 1 animal species, or a species listed as a state Species of Special Concern.

No County List A or B plant species, Group 1 animal species, or state Species of Special Concern are known or expected to occur on site. The project would have no impact on a County List A or B plant species, Group 1 animal species, or state Species of Special Concern.

C. The project would not impact the local long-term survival of a County List C or D plant species or a County Group 2 animal species.

No County List C or D plant species or Group 2 animal species are known or expected to occur within the project site. The project would not significantly impact the local long-term survival of a County List C or D plant species or a County Group 2 animal species.

D. The project would not impact arroyo toad aestivation, foraging, or breeding habitat.

No arroyo toad aestivation, foraging, or breeding habitat occurs on the site. The nearest designated arroyo toad critical habitat is over 4.5 miles from the site.

E. The project would not impact golden eagle habitat.

No golden eagle observations have been reported within five miles of the site. The project site does not contain any cliffs for nesting habitat. The developed surroundings would indicate that the site has low value for golden eagle. Nesting in the project vicinity is not expected. Therefore, no impacts would occur to golden eagle or its habitat.

F. The project not would result in a significant loss of functional foraging habitat for raptors.

As stated above, there is no native habitat on site, and the site is too small to be functional raptor foraging habitat. Impacts to raptor foraging habitat would not be significant.

G. The project would not 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 supports multiple wildlife species.

The project site is not located within a large block of habitat and does not support multiple or sensitive wildlife species. As such, the project would not impact the viability of a future core wildlife area.

H. The project would not 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.

The site is not located adjacent to existing open space. The adjacent is also surrounded by existing development. Edge effects from human access, domestic animals, exotic pest species, operational noise, and lighting already affect the project site and adjacent habitat and would not noticeably increase with the proposed project. The project will follow County regulations for noise and lighting. Therefore, no significant indirect impacts to sensitive species would occur over the long term.

I. The project would not impact occupied burrowing owl habitat.

The project is not located within predicted burrowing owl habitat according to the Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County (County 2010b Appendix A). No owls or burrows were observed within the project site. The site is small and surrounded by non-native trees and buildings. Therefore, the site is not considered occupied burrowing owl habitat, and no impact to occupied burrowing owl habitat would occur.

J. The project would not impact occupied cactus wren habitat, or formerly occupied coastal cactus wren habitat that has been burned by wildfire.

The project does not support occupied cactus wren habitat. No Opuntia cacti were observed on site. The site lacks coastal sage scrub, and existing anthropogenic disturbances would likely deter this species from nesting in the area. Therefore, no impact to cactus wren habitat would occur.

K. The project would not impact occupied Hermes copper butterfly habitat.

The project does not support occupied Hermes copper butterfly habitat. Although Hermes copper butterfly observations were reported within five miles of the site, no spiny redberry, its host plant, was present on site. Additionally, buckwheat, its nectar plant, was not present on site. No impact to Hermes copper butterfly habitat would occur.

Effects Found to be Potentially Significant

The project could result in significant impacts under the following guidelines:

L. The project could impact nesting success of tree-nesting raptors through grading, clearing, fire fuel modification, and/or other noise generating activities such as construction.

Project construction could impact the nesting success of tree-nesting raptors, which have the potential to nest in the immediate vicinity of construction impact areas. Noise from such sources as clearing, grading, and blasting could result in an impact to wildlife. Noise-related impacts would be

considered significant if sensitive species (such as raptors) were displaced from their nests and failed to breed. Raptors or other sensitive bird species nesting within any area impacted by noise exceeding 60 decibels (dB) or ambient could be significantly impacted. If tree-nesting raptors were nesting within 500 feet of the impact area, effects resulting from construction noise would be significant.

Proposed Mitigation Measures

BIO-1 No grading or clearing shall occur during the raptor and migratory bird breeding season (January 15–August 31). All grading and improvement plans shall state the same. If clearing or grading is proposed to start during the breeding season, a pre-construction survey shall be conducted within seven days prior to starting work to determine whether breeding birds occur in or within 500 feet of the impact area(s). If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, clearing, grubbing, and grading shall be allowed to proceed. If active nests or nesting birds are observed within the area, the biologist shall flag the active nests and construction activities shall avoid active nests until nesting behavior has ceased, nests have failed, or young have fledged. Construction near an active nest (within 300 feet for passerines, 500 feet for raptors, or as otherwise determined by a qualified biologist) shall either: (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA or ambient, as confirmed by a County-approved noise specialist. Intermittent monitoring by a qualified biologist would be required.

Conclusion

Project implementation could result in significant impacts to raptors with the potential to nest and/or forage over the site and immediate vicinity. Potential significant impacts could result from direct disturbance and noise. Implementation of mitigation measure **BIO-1** would reduce impacts to less than significant.

Issue 2 – Riparian Habitat and Sensitive Natural Communities

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the USFWS or CDFW?

Effects Found Not to be Significant

The project would not result in significant impacts under the following guidelines:

A. Project-related grading, clearing, construction, or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5 in the County Guidelines for Determining Significance [County 2010b], excluding those without a mitigation ratio) on or off the project site.

No sensitive habitat types were observed on the site or within a 100-foot buffer. Disturbed habitat and urban/developed land are not sensitive and do not require mitigation. No significant impacts to sensitive habitats would occur.

Table 2
PROPOSED IMPACTS
(acres)

Vegetation Community/ Habitat Type	Existing On Site	Impacts
Disturbed Habitat (11300)	2.15	2.15
Urban/developed (12000)	1.03	1.03
TOTAL	**3.18**	**3.18**

B. The following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by the USACE, CDFW, and County: vegetation removal; grading; diversion of water flow; placement of fill; placement of structures; road crossing construction; placement of culverts; disturbance of the substratum; and activities that may cause an adverse change in native species composition, diversity, and abundance.

No riparian habitat or wetlands are present within the project site. Therefore, no significant impact will occur to any riparian habitat.

C. The project would not draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.

No groundwater withdrawals or activities that could result in lowering of the groundwater table are proposed. No significant impact would occur.

D. The project would not 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 habitats over the long term.

The site is not located adjacent to existing open space. The project area is surrounded by development on all sides. Therefore, no significant indirect impacts to sensitive habitats would occur over the long term.

E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

No RPO wetlands exist on site; therefore, no buffer is required and there would be no significant impact related to wetland buffers.

Proposed Mitigation Measures

No mitigation is required for impacts to sensitive habitats.

Conclusion

Project implementation would not result in significant impacts on riparian habitat or sensitive natural communities, and no mitigation is required.

Issue 3 – Jurisdictional Wetlands and Waterways

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Effects Found Not to be Significant

No jurisdictional wetlands or waters occur on the project site therefore no impacts to jurisdictional wetlands or waters will occur.

Proposed Mitigation Measures

No mitigation is required.

Conclusion

Project implementation would not result in significant impacts to jurisdictional wetlands or waters. No mitigation is required.

Issue 4 – Wildlife Movement and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Effects Found Not to be Significant

A. The project would not impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

The project would not impede wildlife access to on- or off-site areas that may be used for foraging, breeding, and/or obtaining water or access to areas necessary for reproduction. The site is not located within a wildlife corridor or movement area and does not support significant foraging or breeding habitat. The area does not support critical populations of animal species or known nursery sites. Impacts would be less than significant.

B. The project would not substantially interfere with connectivity between blocks of habitat and would not potentially block or substantially interfere with a local or regional wildlife corridor or linkage.

The project is not located between blocks of habitat and would not substantially interfere with connectivity between blocks of habitat. The site is not located within a local or regional wildlife corridor or linkage and would not potentially block or substantially interfere with a local or regional wildlife corridor or linkage. Impacts would be less than significant.

C. The project would not create artificial wildlife corridors that do not follow natural movement patterns.

The project does not create any wildlife corridors. Impacts would be less than significant.

D. The project would not increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.

The project is not located in a known wildlife corridor or linkage; however, all lighting would comply with the County Light Pollution Code to minimize light spill outside of the project site. Noise must also meet County standards at the property lines. No significant impact to wildlife corridors or linkages resulting from lighting or noise would occur.

E. The project maintains an adequate width for an existing wildlife corridor or linkage and would not further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, or placement of barriers in the movement path.

The project site is not located in an existing wildlife corridor or linkage and would not further constrain and already narrow corridor. No significant impact to wildlife corridors or linkages would occur.

F. The project maintains adequate visual continuity (i.e., long lines-of-site) within wildlife corridors and linkage.

The project site is not located in a wildlife corridor or linkage. Impacts would be less than significant.

Proposed Mitigation Measures

No mitigation is required.

Conclusion

Project implementation would not result in significant impacts on wildlife movement or nursery sites. No mitigation is required.

Issue 5 – Local Policies, Ordinances, and Adopted Plans

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

Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional or state habitat conservation plan?

Effects Found Not to be Significant

A. The project would not impact Diegan coastal sage scrub vegetation outside of the MSCP in excess of the County's five percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.

No Diegan coastal sage scrub was observed within the project area, and the project is located within the adopted MSCP Subarea. No impact would occur.

B. The project would not preclude or prevent the preparation of the subregional NCCP. For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.

The project would not occur within areas identified as Preserve or Pre-Approved Mitigation Area by the MSCP subarea Plan. The project would not impact sensitive habitats and would not have a significant impact on sensitive plant or animal species. No significant impact would occur.

C. The project would impact wetlands outlined in the RPO.

No RPO wetlands are present on site. No impact to RPO wetlands would occur.

D. The project would minimize and mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.

No coastal sage scrub is present on site. The project would not impact any coastal sage scrub. No impact would occur.

E. The project does not conform to goals and requirements outlined in any applicable HCP, Resource Management Plan (RMP), Special Area Management Plan, Watershed Plan, or similar regional planning effort.

No adopted HCP, RMP, Special Area Management Plan, Watershed Plan, or other regional planning efforts are applicable to the project except for the MSCP, which is discussed under other guidelines. As such, the project would not conflict with any adopted plans. No impact would occur.

F. For lands within the MSCP, the project would not minimize impacts to Biological Resource Core Area, as defined in the Biological Mitigation Ordinance (BMO).

The site is not located within a Biological Resource Core Area, as defined by the BMO. No impact would occur.

G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.

The project would not preclude connectivity between high habitat value areas. The majority of the site and surrounding area is Developed. No dense patches of coastal sage scrub occur near the project site. No impact would occur.

H. The project does not maintain existing movement corridors and/or habitat linkages, as defined by the BMO.

The site is not located within an existing wildlife movement corridor or habitat linkage, as defined by the BMO. No impact would occur.

I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.

No MSCP narrow endemic species occur on the project site. No impact would occur.

J. The project would reduce the likelihood of survival and recovery of listed species in the wild.

No state or federally listed species are expected to occur within the project site, which is small and surrounded by development. No impact would occur.

K. The project would result in the take of eagles, eagle eggs, or any part of an eagle (Bald and Golden Eagle Protection Act).

The nearest known golden eagle nests are located more than five miles away from the project site. The project site does not contain nesting or foraging habitat and is surrounded by development; therefore, the site has low value for the bald or golden eagle. New nesting in the vicinity is unlikely. Therefore, no impacts would occur to bald or golden eagles.

Effects Found to be Potentially Significant

The project could result in significant impacts under the following guidelines:

A. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).

Project construction during the avian breeding season could potentially result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs protected under the MBTA. These impacts would be significant.

Proposed Mitigation Measures

The project would implement breeding season avoidance for migratory birds and raptors per mitigation measure **BIO-1**.

Conclusion

Project construction during the breeding season could result in significant impacts to migratory birds and the destruction of active migratory bird nests and/or eggs. Implementation of mitigation measure **BIO-1** would reduce impacts to less than significant.

CUMULATIVE IMPACTS

As discussed above, the only potential significant impacts from the project are to nesting raptors or migratory birds, if the project were to commence grading during the breeding season. Potential impacts to nesting raptors will be mitigated through implementation of breeding season avoidance between January 15 and August 31 in compliance with the MBTA and CFG Code. All other projects within the cumulative study area are also required to comply with the MBTA and CFG Code. Therefore, the project would not contribute to a significant cumulative impact on nesting raptors or migratory birds. In addition, the project would not result in potentially significant impacts on riparian habitat and sensitive natural communities, waters of the U.S., wildlife movement and nursery sites, or local policy consistency, and thus the project would not have cumulatively considerable impacts in any of those areas. Consequently, no additional review of cumulative impacts is required under CEQA.

I certify that the information in this report and enclosures are correct and accurately represent my work. Please do not hesitate to contact Beth Ehsan or me at (619) 462-1515 if you have any questions or require further assistance.

Sincerely,

Karl Osmundson
County-Approved Biological Consultant

Attachments:

Figure 1: Regional Location Map
Figure 2: Project Vicinity Map (USGS Topography)
Figure 3: Project Vicinity Map (Aerial Photograph)
Figure 4: Soils
Figure 5: Vegetation
Figure 6: Vegetation and Proposed Impacts
Attachment A: Plant Species Observed
Attachment B: Animal Species Observed or Detected
Attachment C: Special-Status Plant Species with Potential to Occur
Attachment D: Special-Status Animal Species with Potential to Occur
Attachment E: Representative Site Photos

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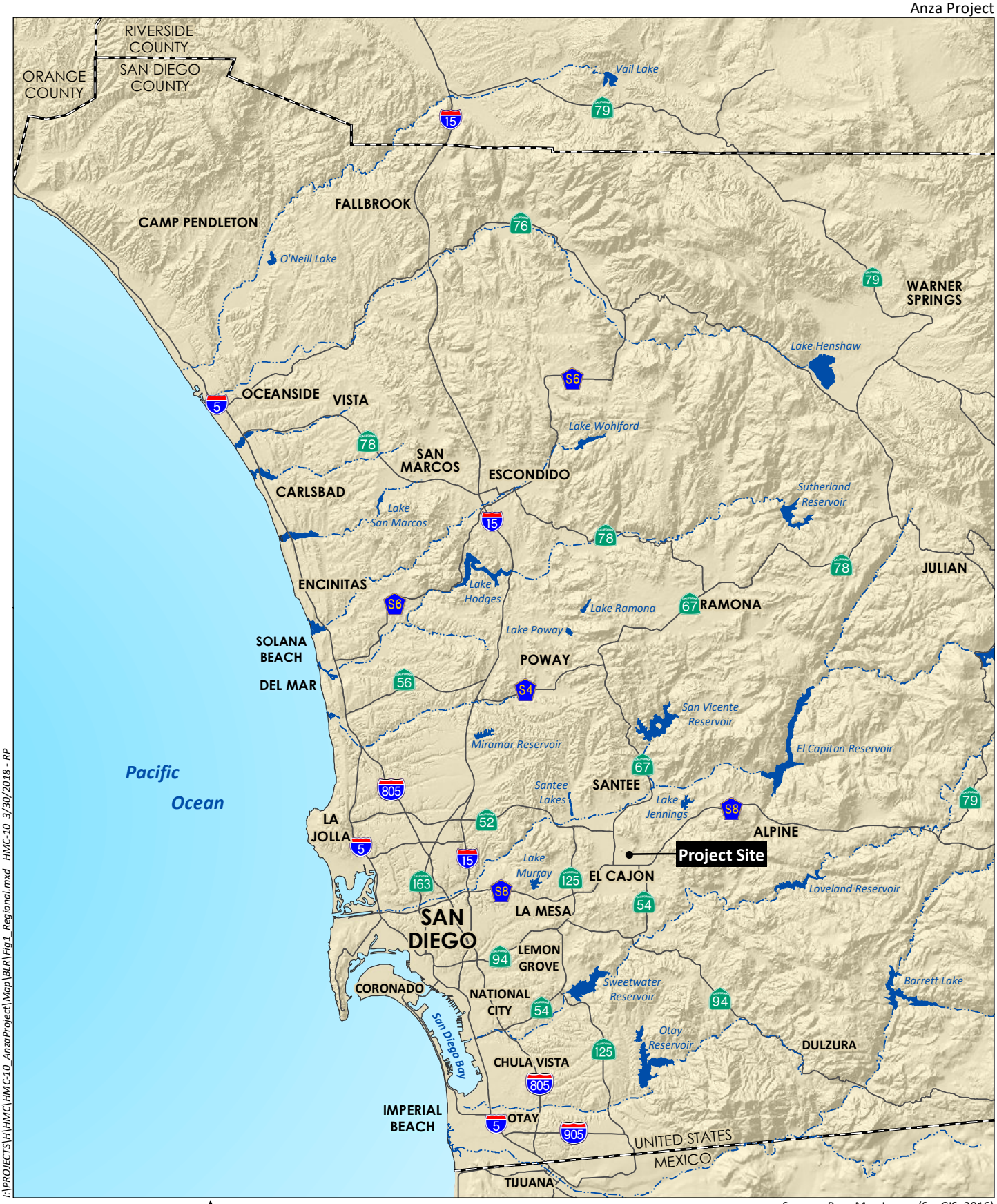


I:\PROJECTS\HI\HMC\HMC-10_AnzaProject\Map\BLR\Fig1_Regional.mxd HMC-10 3/30/2018 - RP

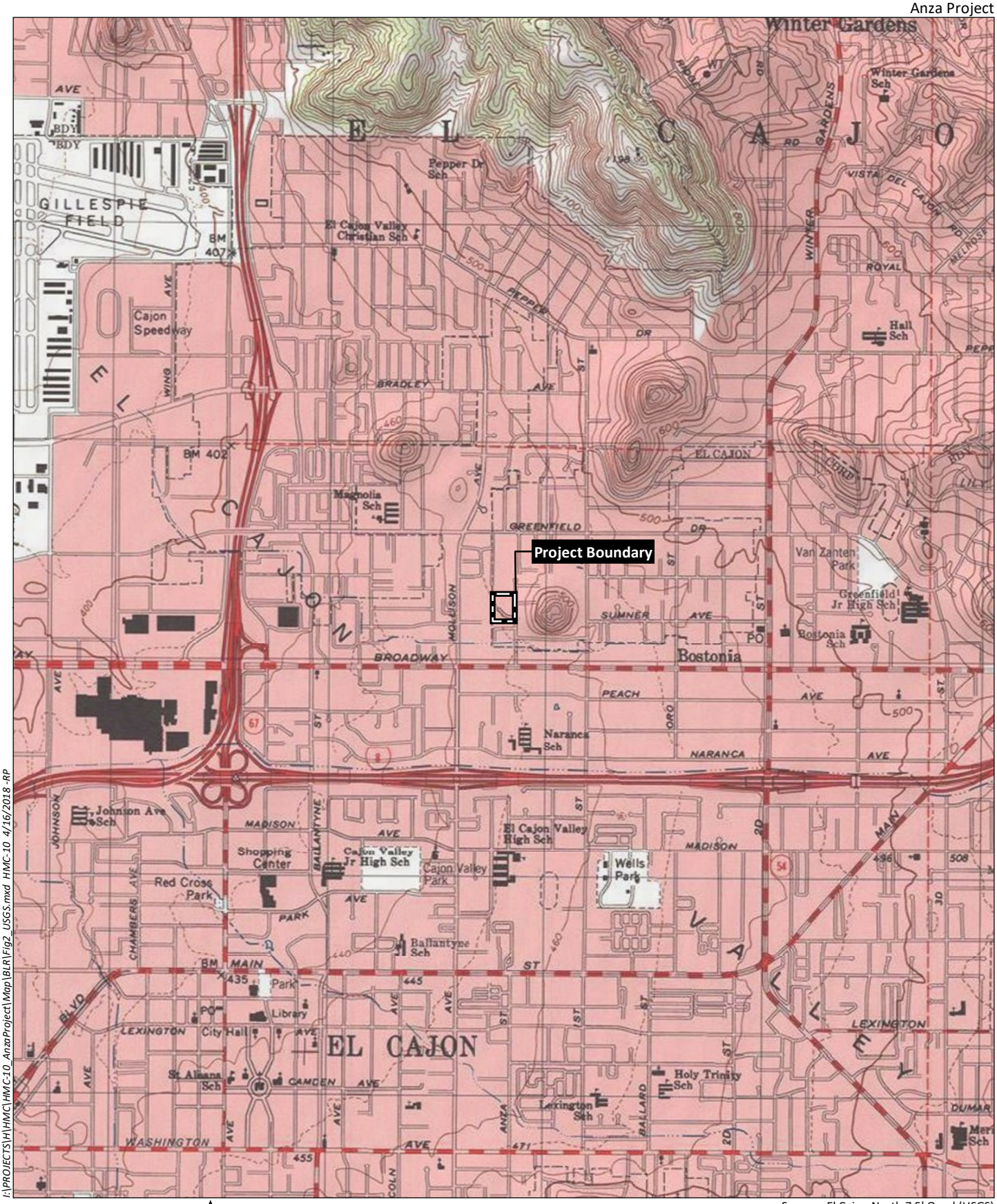
0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1



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0 2,000 Feet

Source: El Cajon North 7.5' Quad (USGS)

HELIX Environmental Planning

USGS Topography

Figure 2

I:\PROJECTS\HI\HMC\HMC-10_AnzaProject\Map\BLR\Fig3_Aerial.mxd HMC-10 3/30/2018 - RP

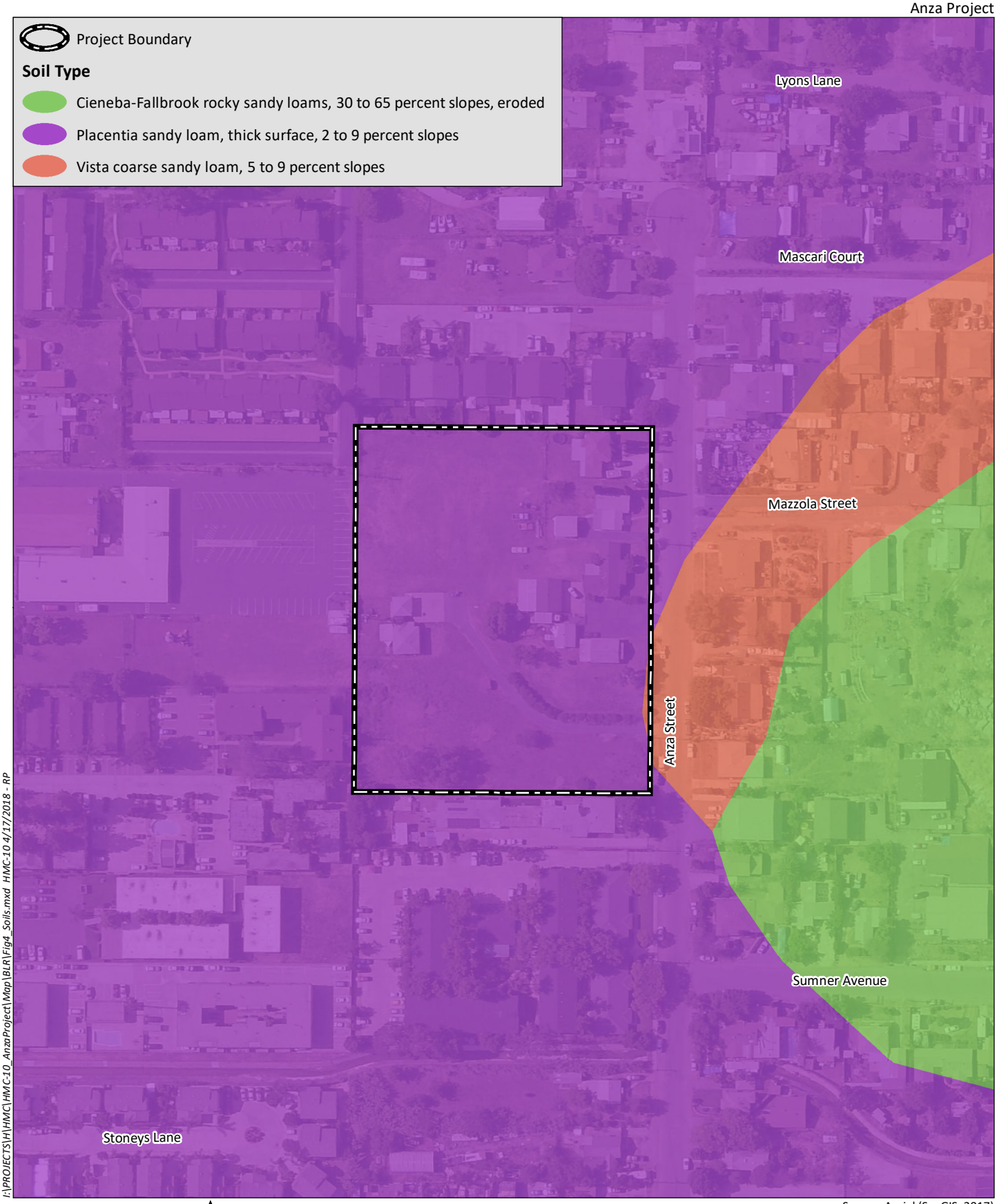
0 150 Feet

Source: Aerial (SanGIS, 2017)

HELIX Environmental Planning

Aerial Photograph

Figure 3



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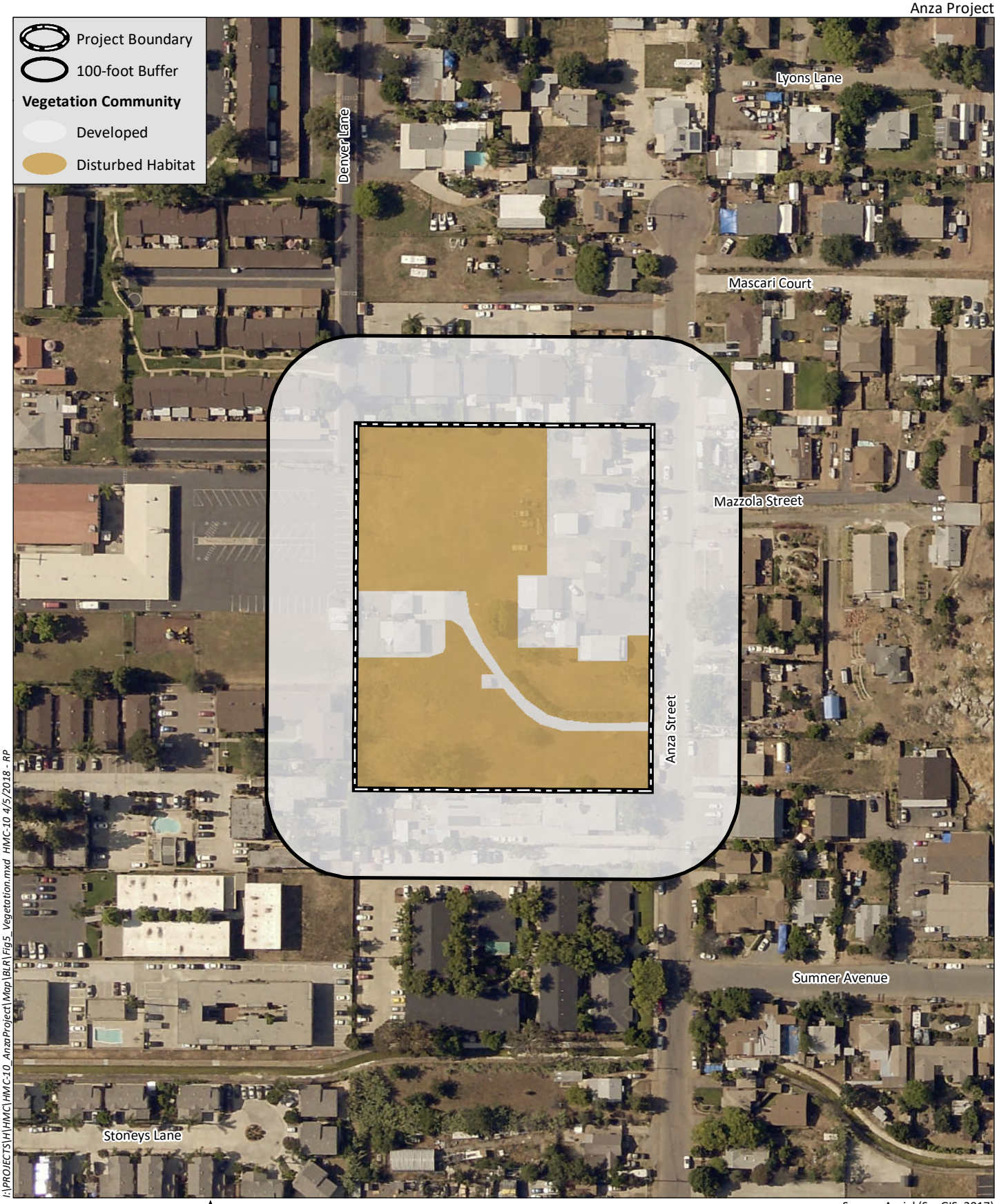
Source: Aerial (SanGIS, 2017)

HELIX Environmental Planning

Soils

Figure 4



HELIX Environmental Planning

Vegetation

Figure 5

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0 150 Feet

Source: Aerial (SanGIS, 2017)

HELIX Environmental Planning

Impacts

Figure 6

Attachment A
Plant Species Observed

Family	Scientific Name	Common Name
Anacardiaceae	*Schinus molle**	Peruvian pepper
	*Schinus terebinthifolius**	Brazilian pepper
Apocynaceae	*Plumeria* sp.*	plumeria
Arecaceae	*Washingtonia robusta**	Mexican fan palm
Asteraceae	*Cotula australis**	Australian brass-buttons
	*Lactuca serriola**	wild lettuce
Boraginaceae	*Plagiobothrys* sp.	popcorn flower
Brassicaceae	*Sisymbrium irio**	London rocket
Caprifoliaceae	*Lonicera* sp.*	honeysuckle
Chenopodiaceae	*Atriplex semibaccata**	Australian saltbush
Chenopodiaceae	*Salsola tragus**	Russian thistle
Crassulaceae	*Crassula connata*	pygmy-weed
Crassulaceae	*Crassula ovata**	jade plant
Cucurbitaceae	*Marah macrocarpa*	wild cucumber
Cycadaceae	*Cycas revoluta**	sago palm
Fabaceae	*Melilotus* sp.*	sweetclover
Geraniaceae	*Erodium botrys**	long-beak filaree
	*Erodium cicutarium**	redstem filaree
	*Erodium moschatum**	green-stem filaree
	Geranium sp.*	geranium
Lamiaceae	*Lamium amplexicaule**	henbit
Malvaceae	*Malva parviflora**	cheeseweed
Myrtaceae	*Callistemon* sp.*	bottle brush
	Eucalyptus sp.*	eucalyptus
Oxalidaceae	*Oxalis pes-caprae**	Bermuda buttercup
Passifloraceae	*Passiflora caerulea**	passionflower
Poaceae	*Cynodon dactylon**	Bermuda grass
	*Stipa miliacea**	smilo grass
Rosaceae	*Rosa* sp.*	rose
Rutaceae	*Citrus* sp.*	orange
Solanaceae	*Solanum americanum*	white nightshade

*Non-native species

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Attachment B
Animal Species Observed or Detected

Family	Scientific Name	Common Name
VERTEBRATES		
Birds		
Columbidae	*Zenaida macroura*	mourning dove
Emberizidae	*Zonotrichia leucophrys*	white-crowned sparrow
Fringillidae	*Carpodacus mexicanus*	house finch
Mimidae	*Mimus polyglottos*	northern mockingbird
Trochilidae	*Calypte anna*	Anna's hummingbird
Mammals		
Felidae	*Felis silvestris catus*	domestic cat

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Attachment C
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Acanthomintha ilicifolia	San Diego thorn-mint	FE	CT	1B.1	List A	Chaparral, coastal scrub, valley and foothill grassland vernal pools supported by clay soils. Known Elevation Limits: 10 – 960 m.	Annual herb	Apr – Jun	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species. No portions of the project site are characterized by chaparral, coastal sage scrub, or vernal pools supported by clay soils. The project site is heavily disturbed and dominated by ruderal species.
Adolphia californica	California adolphia	--	--	2B.1	List B	Chaparral, valley grassland, and coastal sage scrub. Known Elevation Limits: 0 – 400 m.	Shrub	Dec – May	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This shrub would have been observed if present.
Ambrosia monogyra	Singlewhorl burrobrush	--	--	2B.2	--	Chaparral. Known Elevation Limits: 0 – 500 m.	Shrub	Aug – Nov	**Not Likely to Occur** Appropriate habitat type is not present on the project site. This shrub would have been observed if present.
Ambrosia pumila	San Diego ambrosia	FE	--	1B.1	List A	Chaparral, valley grassland, coastal sage scrub, and freshwater wetlands. Known to occur in vernal pools. Known Elevation Limits: 50 – 600 m.	Perennial herb	Apr – Oct	**Not Likely to Occur** Appropriate habitat types are not present on the project site. The project site is highly disturbed and would unlikely support this species.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Artemisia palmeri	San Diego sagewort	--	--	4.2	List D	Chaparral and coastal sage scrub. Known Elevation Limits: 0 – 600 m.	Shrub	May – Sep	**Not Likely to Occur** Appropriate habitat types are not present on the project site. The project site is highly disturbed and would unlikely support this species.
Astragalus deanei	Dean's milkvetch	--	--	1B.1	List A	Chaparral and coastal sage scrub. Often associated with riparian habitat. Known Elevation Limits: 250 – 800 m.	Perennial herb	Feb – May	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This herb would have been observed if present as the survey was conducted during its blooming period.
Bloomeria clevelandii	San Diego goldenstar	--	--	1B.1	--	Coastal sage scrub, chaparral, valley grassland, and freshwater wetlands. Usually occurs in non-wetlands. Known Elevation Limits: 0 – 100 m.	Perennial herb	Apr – May	**Not Likely to Occur** Appropriate habitat types are not present on the project site. The project site is highly disturbed and would unlikely support this species.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Brodiaea orcuttii	Orcutt's brodiaea	—	—	1B.1	List A	Closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, and vernal pools in mesic environments supported by clay and sometimes serpentine soils. Known Elevation Limits: 30 – 1692 m.	Bulbiferous herb	May – Jul	**Not Likely to Occur** The project area is primarily characterized by disturbed habitat and does not support suitable habitat for this species. No portions of the project area are characterized by forests, chaparral, cismontane woodlands, vernal pools, or clay soils.
Ceanothus cyaneus	Lakeside ceanothus	—	—	1B.2	List A	Typically occurs in a tall, mesic, dense, almost impenetrable chaparral with a mix of chamise and other shrubs. Known to occur on acid igneous rock land and Cieneba very rocky coarse sandy loam. Known Elevation Limits: 235 – 755 m.	Evergreen shrub	Apr – Jun	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species. There is no chaparral on the site.
Ceanothus otayensis	Otay Mountain ceanothus	--	--	1B.2	--	Chaparral. Known Elevation Limits: 120 – 1100 m.	Shrub	Jan – Apr	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This shrub would have been observed if present.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Ceanothus verrucosus	Wart-stemmed ceanothus	--	--	2B.2	List B	Chaparral. Known Elevation Limits: 0 – 350 m.	Shrub	Jan – Apr	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This shrub would have been observed if present.
Centromadia pungens laevis	Smooth tarplant	--	--	1B.1	List A	Shadscale scrub, alkali sinks, and valley grasslands. Often in open, poorly drained flats, depressions, waterway banks and bed, grasslands, and disturbed sites. Known Elevation Limits: 90 – 500 m.	Annual herb	Apr – Sep	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species. No portions of the project area are characterized by shadscale scrub, alkali sinks, or poorly drained grassland.
Clarkia delicata	Campo clarkia	—	—	1B.2	List A	Occurs in the periphery of oak woodlands and cismontane chaparral haunts. Occurs in Bancas stony loam. Observed where partially shaded by tree canopy or large shrubs, and typically in vernally mesic situations with substantial peripheral annual and herbaceous spring growth. Known Elevation Limits: 235 – 1000 m.	Annual herb	Apr – Jun	**Not Likely to Occur** The project area is primarily characterized by disturbed habitat and does not support suitable habitat for this species. No portions of the project site are characterized by cismontane chaparral, oak woodland, Bancas stony loam, nor a vernally mesic site.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Deinandra conjugens	Otay tarplant	FE	CT	1B.1	List A	Found in valley grassland and coastal sage scrub. Known Elevation Limits: 20 – 300 m.	Annual herb	May – Jun	**Not Likely to Occur** Appropriate habitat types are not present on the project site. Habitat on site is highly disturbed and would likely preclude this species.
Dudleya variegata	Variegated dudleya	--	--	1B.2	List A	Chaparral, valley grassland, foothill woodland, coastal sage scrub, and freshwater wetlands. Known Elevation Limits: 0 – 300 m.	Perennial herb	Apr – Jun	**Not Likely to Occur** Appropriate habitat types are not present on the project site. Habitat on site is highly disturbed and would likely preclude this species.
Ericameria palmeri var. *palmeri*	Palmer's goldenbush	--	--	1B.1	List B	Coastal drainages, mesic chaparral, and occasionally in coastal sage scrub. Known Elevation Limits: 0-600 m.	Shrub	Sep – Nov	**Not Likely to Occur** The project area is primarily characterized by disturbed habitat and does not support suitable habitat for this species. No portions of the project site are characterized by coastal drainages, mesic chaparral or scrub.
Ferocactus viridescens	San Diego barrel cactus	--	--	2.B1	List B	Chaparral, valley grassland, coastal sage scrub, and freshwater wetlands. Known Elevation Limits: 10 – 150 m.	Stem succulent	May – Jun	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This stem succulent would have been observed if present.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Grindelia hallii	San Diego gumplant	--	--	1.B2	--	Chaparral, valley grassland, and yellow pine forest. Known Elevation Limits: 800 – 1700 m.	Perennial herb	Jul – Oct	**Not Likely to Occur** Appropriate habitat types are not present on the project site. Habitat on site is highly disturbed and would likely preclude this species.
Harpagonella palmeri	Palmer's grapplinghook	--	--	4.2	List D	Chaparral, valley grassland, and coastal sage scrub. Known Elevation Limits: 0 – 1000 m.	Annual herb	Mar – May	**Not Likely to Occur** Appropriate habitat types are not present on the project site. Habitat on site is highly disturbed and would likely preclude this species.
Iva hayesiana	San Diego marsh elder	--	--	2.B2	List B	Alkali sink and wetland-riparian. Known Elevation Limits: 0 – 300 m.	Perennial herb	Apr – Oct	**Not Likely to Occur** No wetland habitat is present on the project site.
Nolina interrata	Dehesa nolina	--	CE	1B.1	List A	Chaparral. Known Elevation Limits: 200 – 700 m.	Perennial herb	Jun – Jul	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species.
Pogogyne abramsii	San Diego mesa mint	FE	CE	1B.1	List A	Chaparral, coastal sage scrub, freshwater wetlands, and wetland-riparian. Associated with vernal pools. Known Elevation Limits: 100 – 200 m.	Annual herb	Mar – Jul	**Not Likely to Occur** Vernal pools do not occur on the project site.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				
Pseudognaphalium leucocephalum	White cudweed	--	--	2B.2	--	Coastal sage scrub and chaparral. Known Elevation Limits: 0 – 500 m.	Perennial herb	Aug – Nov	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species.
Quercus dumosa	Nuttall's scrub oak	--	--	1B.1	List A	Chaparral and coastal sage scrub. Known Elevation Limits: 0 – 200 m.	Shrub	Feb – Mar	**Not Likely to Occur** Appropriate habitat types are not present on the project site. This shrub would have been observed if present.
Tetracoccus dioicus	Parry's tetracoccus	—	—	1B.2	List A	Chaparral, often chamise-dominated, and coastal sage scrub, preferred soils are of the Las Posas series. Known Elevation Limits: 165 – 1,000 meters	Deciduous shrub	Apr – May	**Not Likely to Occur** The project area does not contain suitable habitat to support this species. No portions of the project site are characterized as chamise chaparral or coastal sage scrub, nor does the site include Las Posas soils.
Texosporium sancti-jacobi	Woven-spored lichen	--	--	3	--	On soil, small mammal pellets, dead twigs, and on *Selaginella* spp.	Crustose lichen	NA	**Not Likely to Occur** The project site is primarily characterized by disturbed habitat and does not support suitable habitat for this species.

Attachment C (cont.)
Special Status Plant Species with Potential to Occur

Species		Status				Preferred Habitat	Life Form	Blooming Period	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	USFWS	CDFW	CRPR	San Diego County				

U.S. Fish and Wildlife Service
FE Federal Endangered
FT Federal Threatened
PE Proposed Endangered
PT Proposed Threatened
FC Federal Candidate
FSC Species of Concern*
*No longer recognized as a federal designation.

California Department of Fish and Game
CE California Endangered
CT California Threatened
CR California Rare

California Native Plant Society
1A Plants presumed extinct in California.
1B Plants rare, threatened, or endangered in California and elsewhere.
2 Plants rare, threatened, or endangered in California, but more common elsewhere.
3 Plants in need of more information.
4 Plants of limited distribution.
** No Longer Recognized as Sensitive by CNPS

San Diego County Sensitive:
San Diego County List A
San Diego County List B
San Diego County List C
San Diego County List D

Not Likely to Occur – There are no present or historical records of the species occurring on or in the immediate vicinity (within three miles) of the survey area and the diagnostic habitats strongly associated with the species do not occur on or in the immediate vicinity of the survey area.

Low Potential to Occur – There is a historical record of the species in the vicinity of the survey area and potentially suitable habitat on the survey area, but existing conditions, such as density of cover, prevalence of non-native species, evidence of disturbance, limited habitat area, isolation, substantially reduce the possibility that the species may occur. The survey area is above or below the recognized elevation limits for this species.

Moderate Potential to Occur – The diagnostic habitats associated with the species occur on or in the immediate vicinity of the survey area, but there is not a recorded occurrence of the species within the immediate vicinity (within three miles). Some species that contain extremely limited distributions may be considered moderate, even if there is a recorded occurrence in the immediate vicinity.

High Potential to Occur – There is both suitable habitat associated with the species and a historical record of the species on or in the immediate vicinity of the survey area (within three miles).

Species Present – The species was observed on the survey area at the time of the survey or during a previous biological survey.

Attachment D
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Insects							
Bombus crotchii	Crotch bumble bee	--	--	--	G3G4 S1S2	Associated with its food plants including: Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	**Not Likely to Occur** No suitable habitat occurs within the project site. The project site does not support this species' food plants.
Branchinecta sandiegonensis	San Diego fairy shrimp	FE	--	Group 1	G2 S2	Vernal pools and shallow ephemeral ponds.	**Not Likely to Occur** No suitable habitat occurs within the project site. The survey site does not support vernal pools or shallow ephemeral ponds.
Callophrys thornei	Thorne's hairstreak	--	--	Group 1	G1 S1	Associated with Tecate cypress (*Cupressus forbesii*). Only known from vicinity of Otay Mountain.	**Not Likely to Occur** No suitable habitat occurs within the project site. The site does not support Tecate cypress.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Euphydryas editha quino	Quino checkerspot butterfly	FE	—	Group 1	—	Known to occur in clay soil meadows, native and non-native grasslands, coastal and semi-desert scrubs, and chaparrals with canopy openings supported by clay or cryptogamic crusts. This species requires host plants in the families Plantaginaceae and Scrophulariaceae; most commonly dwarf plantain (*Plantago erecta*) and purple owl's-clover (*Castilleja exserta*).	**Not Likely to Occur** None of this species' host plants were observed within the project site. This species is not likely to use the project site during its larval stage due to lack of host plants, nor does the site support its preferred nectar sources. The project site is not located within the USFWS survey area for this species.
Lycaena hermes	Hermes copper butterfly	FC	--	Group 1	G1 S1	Found in southern mixed chaparral and coastal sage scrub at western edge of Laguna Mountains. Host plant is *Rhamnus crocea*. Although *R. crocea* is widespread throughout the coast range, *Lycaena hermes* is not.	**Not Likely to Occur** None of this species' host plants were observed within the project site. This species is not likely to use the project site during its larval stage due to lack of host plants, nor does the site support preferred nectar sources.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Reptiles and Amphibians							
Anaxyrus californicus	Arroyo toad	FE	SSC	Group 1	G2G3 S2S3	Found in semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, and desert wash. Requires rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	**Not Likely to Occur** No suitable habitat occurs within the project site. The project site does not support washes or intermittent streams with loose gravelly soil.
Anniella pulchra	California legless lizard	--	SSC	Group 2	--	Areas with loose soil, particularly in sand dunes and or otherwise sandy soil. Generally found in leaf litter, under rocks, logs, or driftwood in oak woodland, chaparral, and desert scrub.	**Not Likely to Occur** No suitable habitat occurs within the project site. The site does not support oak woodland, chaparral or desert scrub. In addition, the site does not support loose soil.
Arizona elegans occidentalis	California glossy snake	--	SSC	--	G5T2 S2	Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the project area for this species.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Aspidoscelis hyperythra	Orange-throated whiptail	—	SSC	Group 2	—	Coastal scrub, chaparral, and valley and foothill hardwood habitats. Prefers washes and sandy areas with patches of brush and rocks. Perennial plants required to support its primary prey, termites.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the project area for this species.
Coleonyx variegatus abbotti	San Diego banded gecko	--	SSC	--	G5T3T4 S1S2	Coastal and cismontane Southern California. Found in granite or rocky outcrops in coastal scrub and chaparral habitats.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the project site for this species.
Coluber fuliginosus	Baja California coachwhip	--	SSC	--	G5 S1S2	In California restricted to southern San Diego County, where it is known from grassland and coastal sage scrub.	**Not Likely to Occur** No suitable habitat occurs within the survey site. The survey site does not support grassland or coastal sage scrub.
Crotalus ruber ruber	Northern red diamond rattlesnake	—	SSC	Group 2	G4 S3	Occurs from coastal San Diego County to the eastern slopes of the mountains and in desert habitats. Occurs from sea level to 900 meters in chaparral, woodland, and arid desert habitats in rocky areas and dense vegetation.	**Not Likely to Occur** The project site is characterized by disturbed land and developed habitat that lacks an abundance of suitable vegetative cover or rocky outcrops.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Phrynosoma coronatum blainvillei	San Diego horned lizard	—	SSC	Group 2	G3G4 S3S4	Inhabits coastal sage scrub and chaparral in arid and semi-arid climate conditions and prefers friable, rocky, or shallow sandy soils.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the project area for this species. No foraging or basking habitat occurs.
Salvadora hexalepis virgultea	Coast patch-nosed snake	—	SSC	Group 2	G5T2 S2S3	Occupies desert scrub, coastal chaparral, washes, sandy flats, and rocky areas, making use of whatever cover is available.	**Not Likely to Occur** This species preferred habitat does not occur within the project area.
Thamnophis hammondii	Two-striped garter snake	--	SSC	Group 1	G4 S3S4	Coastal California from vicinity of Salinas to northwest Baja California from sea level to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the project area for this species. The site does not support a permanent stream or riparian growth.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Avian							
Accipiter cooperii	Cooper's hawk	—	—	Group 1	—	Open, uninterrupted, or marginal type woodlands. Nest sites in riparian growths of deciduous trees, live oaks. Also other various forest habitats that are near water. Dense woodlands and forests are primary foraging habitat for this accipiter.	**Not Likely to Occur** Marginal nesting habitat and foraging habitat occur within the project site for this species. Existing anthropogenic disturbances (human activity and domestic animals) would likely deter this species from nesting in the area.
Agelaius tricolor	Tricolored blackbird	—	SSC	Group 1	G2G3 S1S2	Requires open water, protected nesting substrate, and foraging area with available insect prey.	**Not Likely to Occur** No portions of the project site are currently characterized by open water with a protected nesting substrate.
Aimophila ruficeps canescens	Rufous-crowned sparrow	—	SSC	Group 1	G5T3 S2S3	Resident in southern California coastal sage scrub and sparse mixed chaparral.	**Not Likely to Occur** No portions of the project site are currently characterized by coastal sage scrub or sparse mixed chaparral.
Ammodramus savannarum parpallidus	Grasshopper sparrow	--	SSC	Group 1	--	Typical habitat is dense grasslands that have little or no shrub cover.	**Not Likely to Occur** Disturbed habitat occurs across the majority of the project area. Existing anthropogenic disturbances (human activity and domestic animals) would likely deter this species from nesting in the area.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Buteo swainsoni	Swainson's hawk	--	ST	Group 1	G5 S3	Nests in grasslands, but also use sage flats and swaths of agriculture and native habitat. Nests are often built in only tree visible for miles.	**Not Likely to Occur** Marginal foraging habitat occurs within the project site for this species. Existing anthropogenic disturbances would likely deter this species from nesting in the area.
Campylorhynchus brunneicapillus sandiegensis	Coastal cactus wren	--	SSC	Group 1	G5T3Q S3	Coastal sage scrub with tall *Opuntia* cactus for nesting and roosting.	**Not Likely to Occur** The site lacks cactus and coastal sage scrub, and existing anthropogenic disturbances would likely deter this species from nesting in the area.
Coturnicops noveboracensis	Yellow rail	--	SSC	--	G4 S1S2	Summer resident in eastern Sierra Nevada in Mono County. Frequents freshwater marsh, meadows, and seeps.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.
Falco mexicanus	Prairie falcon	--	--	Group 1	G5 S4	Inhabits dry, open terrain, either level or hilly. Breeding sites located on cliffs. Forages far afield, even to marshlands and ocean shores. Great basin grassland, great basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grassland.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project site. This species is not likely to occur.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Ixobrychus exilis hesperis	Least bittern	--	--	Group 2	--	Freshwater or brackish marshes with tall emergent vegetation with abundant supply of fish and vegetation cover.	**Not Likely to Occur** No portions of the project site are currently characterized by marsh with tall emergent vegetation.
Polioptila californica californica	Coastal California gnatcatcher	FT	SSC	Group 1	G3T2 S2	Obligate, permanent resident of coastal sage scrub below 2500 ft in southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	**Not Likely to Occur** No portions of the project area are currently characterized by coastal sage scrub.
Vireo bellii pusillus	Least Bell's vireo	FE	SE	Group 1	G5T2 S2	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, mesquite.	**Not Likely to Occur** No suitable habitat occurs within the project area. Riparian habitat does not occur within the project area.
Mammals							
Antrozous pallidus	Pallid bat	—	SSC	Group 2	G5 S3	Roosts in crevices, caves, mine shafts, bridges, buildings and tree hollows. Forages on insects in wide variety of habitats.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Chaetodipus californicus femoralis	Dulzura California pocket mouse	—	SSC	Group 2	G5T3 S3	Variety of habitats including coastal scrub, chaparral, and grasslands in San Diego County. Associated with grass-chaparral edges.	**Not Likely to Occur** No portions of the project area are currently characterized by this species preferred habitat. This species is unlikely to occur in the area.
Chaetodipus fallax fallax	Northwestern San Diego pocket mouse	--	SSC	--	G5T3T4 S3S4	Coastal scrub, chaparral, grasslands, sagebrush, etc. in western San Diego County. Sandy, herbaceous areas, usually in association with rocks or coarse gravel.	**Not Likely to Occur** No portions of the project area are currently characterized by this species preferred habitat. This species is unlikely to occur in the area.
Choeronycteris mexicana	Mexican long-tongued bat	--	--	Group 2	G4 S1	Feeds on nectar and pollen of night-blooming succulents. Roosts in relatively well-lit caves, and in and around buildings. Occasionally found in San Diego County, which is on the periphery of their range. Pinon and juniper woodlands, riparian scrub, and Sonoran thorn woodland are preferred habitat.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Corynorhinus townsendii	Townsend's big-eared bat	—	CT	Group 2	G3G4 S2	Desert scrub and coniferous forest. Roosts in caves or abandoned mines, occasionally in buildings.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.
Eumops perotis californicus	Greater western mastiff bat	—	SSC	Group 2	G5T4 S3S4	Rocky areas and cliff faces. Roosts in cliff crevices and buildings.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.
Lasiurus xanthinus	Western yellow bat	--	--	--	G5 S3	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project area. This species is not likely to occur.
Lepus californicus bennettii	Black-tailed jackrabbit	—	—	Group 2	G5T3T4 S3S4	Open desert scrub with suitable cover and burrowing substrate. Burrows beneath desert shrubs and loose friable soils.	**Not Likely to Occur** No suitable burrowing habitat or primary foraging habitat occurs within the project area. This species has a low potential to forage within impacted area.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		
Neotoma lepida intermedia	San Diego desert woodrat	—	SSC	Group 2	—	Typically occurs in coastal scrub throughout Southern California. Prefers moderate to dense canopies and are particularly abundant in rock outcrops, and rocky cliffs and slopes.	**Not Likely to Occur** No rock outcrops occur within the project area and no suitable nesting habitat occurs within the proposed impact area. Existing anthropogenic disturbances would likely deter this species from utilizing the site.
Nyctinomops femorosaccus	Pocketed free-tailed bat	—	SSC	Group 2	G4 S3	Occurs in arid areas associated with pine-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian. Specifically in rocky areas with high cliffs.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project site. This species is not likely to occur.
Nyctinomops macrotis	Big free-tailed bat	--	--	--	G5 S3	Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the project site. This species is not likely to occur.
Taxidea taxus	American badger	—	SSC	Group 2	G5 S3	Prefers herbaceous, shrub, and open stages of most habitats with dry, friable soils. Preys on burrowing rodents.	**Not Likely to Occur** The project site does not provide primary denning or foraging opportunities. Existing anthropogenic disturbances would likely deter this species from utilizing the site.

Attachment D (cont.)
Special Status Animal Species with Potential to Occur

Species		Status				Required Habitat	Potential to Occur/ Known Occurrence/ Suitable Habitat
Scientific Name	Common Name	Federal	State	San Diego County	Other		

Federal		State		Other
FE	Federal Endangered	SE	State Endangered	San Diego County Group 1
FT	Federal Threatened	ST	State Threatened	San Diego County Group 2
PFT	Proposed Federal Threatened	SSC	California Species of Concern	
C	Candidate for Federal Listing	FP	Fully Protected Species	BLM: Sensitive
		WL	Watch List Species	
				G Global Ranking Rarity
				S State Ranking Rarity

Not Likely to Occur – There are no present or historical records of the species occurring on or in the immediate vicinity (within three miles) of the survey area and the diagnostic habitats strongly associated with the species do not occur on or in the immediate vicinity of the survey area.

Low Potential to Occur – There is a historical record of the species in the vicinity of the survey area and potentially suitable habitat on the survey area, but existing conditions, such as density of cover, prevalence of non-native species, evidence of disturbance, limited habitat area, isolation, substantially reduce the possibility that the species may occur. The survey area is above or below the recognized elevation limits for this species.

Moderate Potential to Occur – The diagnostic habitats associated with the species occur on or in the immediate vicinity of the survey area, but there is not a recorded occurrence of the species within the immediate vicinity (within three miles). Some species that contain extremely limited distributions may be considered moderate, even if there is a recorded occurrence in the immediate vicinity.

High Potential to Occur – There is both suitable habitat associated with the species and a historical record of the species on or in the immediate vicinity of the survey area (within three miles).

Species Present – The species was observed on the survey area at the time of the survey or during a previous biological survey.

Northwest corner of site, looking southeast.

Southeast corner of site, looking northwest.

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