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**Subject: Biological Resources Letter Report for the Los Coches Plaza Project (PDS2020-TM-5640; PDS2020-MUP-20-006)**

## Summary

At the request of NLA Lakeside, LLC (applicant), Harris & Associates (Harris) has completed a biological resources letter report for the proposed Los Coches Plaza Project (project) on an approximately 2.88-acre property (project site) in the unincorporated community of Lakeside, in San Diego County, California (Attachment 1, Figures, Figures 1, Regional Location, and 2, Project Site). The project generally consists of a commercial development with two fast-food restaurants, an auto parts store, and a gas station with a food mart and a car wash replacing an existing gas station. The project site occurs in the Metro-Lakeside-Jamul Segment within the adopted County of San Diego (County) Multiple Species Conservation Program (MSCP) South County Subarea Plan and outside of the lands designated as Pre-Approved Mitigation Area.

The project site supports five vegetation communities and land cover types. In the context of the County MSCP, sensitive upland vegetation on the site include 1.70 acres of Diegan coastal sage scrub (and disturbed) (Tier II). Non-sensitive habitat types and land uses on the project site include 0.11 acre of eucalyptus woodland (Tier IV), 0.71 acre of developed land (Tier IV), and 0.36 acre of disturbed habitat (Tier IV). The project site also includes 0.004 acre of non-vegetated concrete-lined channel potentially subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). This non-vegetated concrete-lined channel on the project site does not support wetland or riparian habitat or County Resource Protection Ordinances wetlands.

No rare plants were observed during the February 13 and April 22, 2020, rare plant surveys. Four sensitive wildlife species were observed on the project site: Cooper's hawk (*Accipiter cooperi*), monarch butterfly (*Danaus plexippus*), red-shouldered hawk (*Buteo lineatus*), and turkey vulture (*Cathartes aura*). Cooper's hawk is an MSCP-covered species. An active Cooper's hawk nest was observed on February 13, 2020. The nest was in a blue gum eucalyptus (*Eucalyptus globulus*) on the eastern edge of the project site. The nest was well hidden in the upper-middle portion of the blue gum eucalyptus, approximately 20 feet above ground. Two adults were observed flying over the site, going in and out of the nest, and perching in other eucalyptus trees on and west of the project site during the biological resources survey.

Potentially significant impacts would occur to special-status wildlife species, sensitive natural communities, and jurisdictional waters and wetlands. Permanent impacts to eucalyptus trees and other mature trees that support the sensitive Cooper's hawk and other nesting bird species on and surrounding the project site would occur from grading and vegetation removal during construction of the project and require mitigation. If construction is conducted during the bird-breeding season (January 15 through August 31), temporary direct impacts from disturbance and displacement of nesting birds during vegetation removal could result in significant direct impacts to bird species protected under the Migratory Bird Treaty Act (MBTA). Indirect impacts from construction noise and vibration during clearing, grubbing, and trenching activities, if conducted during the bird-breeding season, could result in significant indirect impacts to bird species protected under the MBTA. The project would result in

direct permanent impacts to sensitive upland habitat, including 1.07 acres of Diegan coastal sage scrub (and disturbed) (Tier II), requiring compensatory mitigation. The project would avoid impacts to the 0.004-acre concrete-lined channel. The majority of the Diegan coastal sage scrub on the project site is disturbed and low-quality due to previous clearing and land uses on the project site.

Mitigation measures related to the following topics are proposed by the project to fully mitigate potential impacts from implementation of the project: general nest surveys, permanent impacts to Diegan coastal sage scrub, and aquatic resources flagging, fencing, and demarcation. Successful implementation of these measures would mitigate potential project and cumulative impacts to less than significant.

## Introduction, Project Description, and Location

The project site is approximately 2.88 acres in the northeastern quadrant of the Interstate (I-) 8 and Los Coches Road interchange in the County (Figure 1). The project includes development of a 2,660-square-foot fast-food restaurant with drive-through, a 7,385-square-foot auto parts store, and a car wash. The existing four-pump, eight-fueling-space gas station and solar panels would remain as is on site. Access to the project site is proposed opposite of the Los Coches Road and Ora Belle Lane intersection. The project does not include off-site development or improvements.

The project site is partially developed with an existing gas station in the southwestern portion of the site (Figure 2). The majority of the site was previously disturbed and used for storage and parking of vehicles and other equipment associated with the existing gas station. The project site is relatively flat, with a gently sloping hill down to the northern and eastern edges of the project site. Vegetation communities and land cover types on the project site include non-vegetated channel, Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, eucalyptus woodland, disturbed habitat, and developed land.

## Setting

Following is a description of the existing conditions on the project site.

### Land Use

The project site is in the unincorporated community of Lakeside approximately 200 feet north of the I-8 corridor on the eastern side of Los Coches Road. Surrounding land uses include residential to the north, east, and west; commercial to the southwest; and the I-8 corridor to the south.

### Topography and Soils

The topography of the site is relatively flat, ranging in elevation from 675 to 700 feet above mean sea level (Figure 3, USGS Topographical Map). U.S. Department of Agriculture Natural Resources Conservation Service soil series identify the soils on the project site as dominated by Vista coarse sandy loam, which is well or excessively well drained (USDA 2019) (Figure 4, Soils). In addition, Visalia sandy loam is present in the northeastern portion of the project site and is characterized as well drained (Figure 4).

### Hydrology

The project site is in the San Diego River watershed (Hydrologic Unit [HU] 903.00) (Project Clean Water 2021). The San Diego River watershed is in the central portion of the County. It is bordered to the north by the San Dieguito and Peñasquitos watersheds and to the south by the Sweetwater and Pueblo San Diego watersheds. The San Diego River originates in the Cuyamaca Mountains of eastern San Diego County and extends west over 52 miles to form a watershed with an area of approximately 277,120 acres. Of the nine major watersheds in the San Diego region, the San Diego River watershed is the most populous watershed management area and is estimated to be home to approximately 520,000 residents (Project Clean Water 2021).

The San Diego River watershed is composed of four hydrologic areas, which have been delineated by the San Diego RWQCB based on drainage patterns: Lower San Diego (Hydrologic Area 907.1), San Vicente (Hydrologic Area 907.2), El Capitan (Hydrologic Area 907.3), and Boulder Creek (Hydrologic Area 907.4). Approximately 44 percent of the land is vacant or undeveloped. The next largest land uses in the watershed are parks and open space (23 percent) and residential (19 percent). The highest concentration of population is in the Lower San Diego Hydrologic Area. The project site is in the Lower San Diego Hydrologic Area.

## Climate

Meteorological data for the project site is gathered at the Lakeside, California, weather station (Lakeside 2 E), approximately 1.9 miles from the project site (NOAA 2021). On the project site, the normal daily maximum temperature is 88.1 degrees Fahrenheit (°F) in August, and the normal daily minimum temperature is 40.3°F in December. The average annual temperature is approximately 64.5°F, with few days above 100°F or below freezing historically. Due to the desert climate, the growing season is typically between April and November (NOAA 2021).

The average precipitation on the project site is approximately 16.21 inches annually, occurring primarily from October through April. Based on data from the Lakeside weather station, the project site vicinity receives the greatest amount of rain, an average of approximately 3.61 inches, during March (NOAA 2021).

## Regional Context

### Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning (NCCP) Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land use. The CDFW is the principal state agency implementing the NCCP Program. NCCP plans developed in accordance with the act provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth.

### County of San Diego Multiple Species Conservation Program

The County MSCP is a long-term, regional habitat conservation program focused on balancing two unique aspects of the County: high biological diversity and rapid urban growth. Under this program, large blocks of interconnected habitat will be conserved through acquisition of land by private and public entities and mitigation from development.

The County MSCP is composed of three separate plan areas covering unincorporated regions of San Diego in South County, North County, and East County. The MSCP plans associated with each of the plan areas are the South County Plan (County Subarea Plan), North County Plan, and East County Plan, respectively. Each MSCP Plan Area's unique geography requires each MSCP plan to be tailored to meet the needs of the unique habitats and species in the respective area.

The County Subarea Plan for the southwestern portion of the County was adopted by the Board of Supervisors in October 1997, approved in 1998, and covers 85 species. The City of San Diego, portions of the unincorporated County, and 10 additional city jurisdictions make up the San Diego MSCP Plan Area.

As a joint habitat conservation plan/natural community conservation plan, the County Subarea Plan meets the requirements of the federal Endangered Species Act and California's Natural Community Conservation Planning Act. The County Subarea Plan provides for large, connected preserve areas that address a number of species at the habitat level rather than species-to-species or area-by-area, which creates a more efficient and effective preserve system and better protection for the rare, threatened, and endangered species in the region. Mitigation from development and local, state, and federal funding protect land that has been set aside for preservation. This preservation may take the form of an open space or conservation easement that dedicates the land in perpetuity.

or actual purchase of fee title by a public agency or environmental land trust. Out of the 582,000-acre area examined under the County MSCP, the goal of the County Subarea Plan is to acquire or permanently protect 98,379 acres in the unincorporated area. The County Subarea Plan establishes the conditions under which the County will receive federal and state long-term take authorizations to “cover” specific wildlife and plant species (covered species). This allows the incidental take permit to be extended to future development projects that comply with the County MSCP; therefore, these projects do not need to receive their own separate incidental take permit from the U.S. Fish and Wildlife Service (USFWS) and CDFW. Through this permitting mechanism, the County Subarea Plan can help conserve covered species, streamline permitting, and facilitate economic growth in the County (County of San Diego 1998).

The community of Lakeside is included in the County Subarea Plan (Figure 1). The County prepared a Lakeside Community Plan (County of San Diego 2011a) as a part of the County’s General Plan (County of San Diego 2011b), and it is the community’s policy to comply with the conservation policies identified in the County Subarea Plan. The project site is within the Metro-Lakeside-Jamul Segment of the County Subarea Plan. The project site is not within the County MSCP Pre-Approved Mitigation Area.

## Jurisdictional Waterways and Watersheds

Jurisdictional waterways and watersheds in the vicinity of the project include Los Coches Creek, which is approximately 0.3 mile north of the project site and is a tributary to the San Diego River approximately 3 miles northwest of the project site (Figure 1). Lake Jennings is approximately 2 miles northeast of the project, and Lindo Lake is approximately 2.5 miles northwest of the project site (Figure 1). Approximately 0.004 acre of non-vegetated concrete-lined channel occurs in the southeastern portion of the project site. Additional details are provided in the Results section, specifically in the Jurisdictional Wetlands and Waterways subsection.

## County of San Diego General Plan

The Conservation and Open Space Element of the County’s General Plan (County of San Diego 2011b) provides the following goals and policies that apply to vegetation and wildlife habitat:

- **Goal COS-1: Inter-Connected Preserve System.** A regionally managed, inter-connected preserve system that embodies the regional biological diversity of San Diego County.
  - **Policy COS-1.1: Coordinated Preserve System.** Identify and develop a coordinated biological preserve system that includes Pre-Approved Mitigation Areas, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.
  - **Policy COS-1.2: Minimize Impacts.** Prohibit private development within established preserves. Minimize impacts within established preserves when the construction of public infrastructure is unavoidable.
  - **Policy COS-1.3: Management.** Monitor, manage, and maintain the regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.
  - **Policy COS-1.6: Assemblage of Preserve Systems.** Support the proactive assemblage of biological preserve systems to protect biological resources and to facilitate development through mitigation banking opportunities.
  - **Policy COS-1.8: Multiple-Resource Preservation Areas.** Support the acquisition of large tracts of land that have multiple resource preservation benefits, such as biology, hydrology, cultural, aesthetics, and community character. Establish funding mechanisms to serve as an alternative when mitigation requirements would not result in the acquisition of large tracts of land.
  - **Policy COS-1.9: Invasive Species.** Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves.

- **Goal COS-2: Sustainability of the Natural Environment.** Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.
  - **Policy COS-2.1: Protection, Restoration and Enhancement.** Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.
  - **Policy COS-2.2: Habitat Protection through Site Design.** Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.
- **Goal COS-3: Protection and Enhancement of Wetlands.** Wetlands that are restored and enhanced and protected from adverse impacts.
  - **Policy COS-3.1: Wetland Protection.** Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.
  - **Policy COS-3.2: Minimize Impacts of Development.** Require development projects to:
    - Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
    - Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.

## Lakeside Community Plan

The Conservation and Recreation Elements of the Lakeside Community Plan (County of San Diego 2011a) provide the following goals and policies that apply to vegetation and wildlife habitat:

- **Environmental Conservation Goal:** Provide a desirable, healthy, and comfortable environment for living, while preserving Lakeside's rural atmosphere and unique resources.
  - **Policy 2:** Preserve the best natural features of the area in their natural state and avoid the creation of a totally urbanized landscape.
  - **Policy 4:** Ensure that land uses within or adjacent to recreational, natural preserve, agricultural, or industrial areas are compatible with those areas.
  - **Policy 5:** Identify and apply the Scenic Area (S) Special Area Designator to sites where significant natural landmarks are located.
  - **Policy 8:** Require the isolation of roadside properties from major roads and prime arterials with buffer zones of vegetation or earth barriers to protect adjacent areas from pollutants such as noise, exhaust, and light.
  - **Policy 9:** Encourage the preservation of mature trees on public and private property, and require equitable replacement of those removed.
- **Floodplain Goal:** Enhance the floodplains as an environmental, recreational, and economic asset to Lakeside.
  - **Policy 1:** Improve natural drainage channels when it is necessary to protect life and property.
  - **Policy 2:** Encourage the utilization of the floodplains outside for recreation, open space, agriculture, and planned extraction of natural resources.
- **Recreation Goal:** Provide a wide variety of recreational activities and facilities that will meet the needs and enrich the lives of all residents of Lakeside.
  - **Policy 6:** Include facilities for a full range of recreational and leisure time activities, such as community recreation centers, swimming pools, areas for meeting rooms for community groups, and natural, undeveloped areas.
  - **Policy 9:** Strive to provide acreage for local recreational areas at the level of 15 acres per 1,000 in population; a goal of the San Diego County General Plan Conservation and Open Space Element. At least one third of the park system's area should be devoted to neighborhood and other close-at-hand recreational facilities, and the remainder used for facilities serving all of Lakeside, such as community parks, community recreation centers, trails, nature preserves, lakes, and camping areas.

## Methods

This biological resources analysis includes a database review, biological resources survey, and rare plant survey to document the existing biological conditions of the project site. The results of this review provide information on the potential constraints to project development due to the presence of special-status biological resources.

### Environmental Document Review

The following documents were reviewed prior to the biological resources survey:

- County Subarea Plan (County of San Diego 1998)
- County Resource Protection Ordinances (County of San Diego 2012)

### Database Review

Review of online databases including the CDFW California Natural Diversity Database (CNDDDB), USFWS National Wetlands Inventory (NWI) Wetlands Mapper, USFWS Information for Planning and Consultation, Consortium of California Herbaria database, Calflora database, and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California was conducted for the project. The County MSCP was also reviewed.

#### California Department of Fish and Wildlife California Natural Diversity Database

CNDDDB searches were conducted for 0.25-, 1-, and 3-mile radii of the project site to identify previously mapped resources within these areas (CDFW 2021a). The results of the CNDDDB searches are presented in the Results section.

#### U.S. Fish and Wildlife Service Information for Planning and Consultation

The USFWS Information for Planning and Consultation report was created by drawing a perimeter around the project site (USFWS 2021a). The results of the location search are provided in the Results section.

#### U.S. Fish and Wildlife Service National Wetland Inventory

USFWS NWI maps were reviewed to identify any wetlands and waters that were mapped on the project site (USFWS 2021b). The USFWS NWI search was conducted by drawing a perimeter around the project site in the web map that identified any previously mapped U.S. Army Corps of Engineers jurisdictional wetlands and waters surrounding the project site. The results of the NWI search are provided in the Results section.

#### California Native Plant Society Inventory of Rare and Endangered Plants of California

The CNPS Inventory of Rare and Endangered Plants of California (online version) assists in the determination of special-status plant species potentially present within a given area (CNPS 2021). CNPS status codes are defined by the CNPS California Rare Plant Rank (CRPR) system described as follows (CNPS 2021): CRPR 1A plants are presumed extirpated in California and either rare or extinct elsewhere; CRPR 1B plants are rare, threatened, or endangered in California and elsewhere; CRPR 2A plants are presumed extirpated in California but common elsewhere; CRPR 2B plants are rare, threatened, or endangered in California but more common elsewhere; CRPR 3 plants lack the necessary information needed to assign them to one of the other ranks or to reject them; and CRPR 4 plants are of limited distribution or infrequent throughout a broader area in California, and their status requires more regular monitoring.

The CNPS CRPR at each level also include a threat rank and are defined as follows: 0.1, seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat); 0.2, moderately threatened in California (20–80 percent occurrences threatened/moderate degree and immediacy of threat); and 0.3, not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).



## California Herbarium and Calflora Databases

The California Herbarium database, a gateway to information for California vascular plant specimens housed in participant herbaria (CCH 2021), and the Calflora database, a database for currently recognized vascular plants in California, were reviewed (Calflora 2021).

## Field Reconnaissance Survey

A biological resources survey of the project site was conducted by Harris Biologists Melissa Tu and Katie Laybourn on February 13, 2020. The survey was conducted by walking transects throughout the project site and mapping vegetation communities, documenting plant and wildlife species, and evaluating the potential for occurrence of sensitive plant and wildlife species (Attachment 2, Plant and Wildlife Species Observed on the Project Site, and Attachment 3, Sensitive Plant and Wildlife Species Potential to Occur).

No sensitive wildlife species protocol surveys were conducted.

## Rare Plant Survey

Two rare plant surveys were conducted to maximize the detection of sensitive plant species' blooming periods. The first survey was conducted in late winter on February 13, 2020, and the second survey was conducted in spring on April 22, 2020.

## Results

The results presented below provide data from the surveys conducted on the project site.

## Vegetation Communities and Land Cover Types

The project site is in the southwestern California region of the California Floristic Province (Jepson eFlora 2021). Specifically, the project site occurs approximately 200 feet north of I-8 on the eastern side of Los Coches Road.

Land uses surrounding the project site include residential, commercial, and the I-8 transportation corridor.

Vegetation communities and land cover types identified on the project site include non-vegetated channel, Diegan coastal sage scrub (and disturbed), eucalyptus woodland, developed land, and disturbed habitat (Oberbauer et al. 2008) (Figure 5, Vegetation Communities) (Table 1). The County MSCP and Biological Resources Guidelines designate certain vegetation communities as sensitive using Tiers I through IV, with Tier I being the most sensitive and Tier III (as mapped in the County MSCP database) being the least sensitive (County of San Diego 1998). Tier IV designates non-sensitive vegetation communities that do not require mitigation for impacts. The sensitive vegetation communities on the project site include those listed as Tier I through Tier III in the County MSCP (Table 1).

**Table 1. Vegetation Communities and Land Cover Types on the Project Site**

Vegetation Community and Land Cover Type	Project Site (acres)	County MSCP Sensitive Vegetation Tier
<b>Wetland</b>		
Non-vegetated channel (64200)	0.004	NA
<b>Subtotal</b>	<b>0.004</b>	<b>NA</b>
<b>Upland Scrub</b>		
Diegan coastal sage scrub (32500)	0.41	II
Disturbed Diegan coastal sage scrub (32500)	1.29	II
<b>Subtotal</b>	<b>1.70</b>	<b>NA</b>

**Table 1. Vegetation Communities and Land Cover Types on the Project Site**

Vegetation Community and Land Cover Type	Project Site (acres)	County MSCP Sensitive Vegetation Tier
<b>Upland Woodland</b>		
Eucalyptus woodland (79100)	0.11	IV
<b>Subtotal</b>	<b>0.11</b>	<b>NA</b>
<b>Developed/Disturbed</b>		
Developed land (12000)	0.71	IV
Disturbed habitat (11300)	0.36	IV
<b>Subtotal</b>	<b>1.07</b>	<b>NA</b>
<b>Total</b>	<b>2.88</b>	<b>NA</b>

**Sources:** County of San Diego 1998, 2010a; Holland 1986; Oberbauer et al. 2008.

**Notes:** MSCP = Multiple Species Conservation Program; NA = not applicable

## Wetland Vegetation Community

### *Non-Vegetated Channel (64200)*

Non-vegetated channel consists of predominantly unvegetated sandy, gravelly, or rocky channels. Variable water lines inhibit the growth of vegetation, although some weedy species of grasses may grow along the outer edges of the channel. Vegetation may exist here but is usually less than 10 percent total cover (Oberbauer et al. 2008).

Harris biologists preliminarily mapped approximately 0.004 acre of non-vegetated concrete-lined channel in the southeast portion of the project site. Because the concrete-lined channel on the project site is human-made, it is discussed further below in Aquatic Resources.

## Upland Scrub Vegetation Community

### *Diegan Coastal Sage Scrub (and Disturbed) (32500)*

Diegan coastal sage scrub consists of low soft-woody shrubs, typically measuring 1.5 to 6.5 feet tall (Holland 1986). Species composition generally consists of California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), white sage (*Salvia apiana*), and laurel sumac (*Malosma laurina*). Diegan coastal sage scrub is present in coastal Southern California from Los Angeles to Baja California, Mexico. It supports a rich diversity of sensitive plants and wildlife. It is estimated that Diegan coastal sage scrub has been reduced by 75 to 80 percent of its historical coverage throughout Southern California. Because of this, it is the focus of the current California NCCP Program.

Diegan coastal sage scrub accounts for approximately 0.41 acre on the project site. Diegan coastal sage scrub occurs in the northern and southeastern portions of the project site (Figure 5). Dominant vegetation in the Diegan coastal sage scrub habitat includes California buckwheat and California sagebrush. Two coast live oaks were observed on the project site, one just inside the project boundary in Diegan coastal sage scrub in the southeast corner of the project site and the other in the Diegan coastal sage scrub in the northeastern corner of the project site (Figure 6, Biological Resources).

Disturbed Diegan coastal sage scrub is the most dominant vegetation community on the project site and occurs on approximately 1.29 acres (Figure 5). The disturbed Diegan coastal sage scrub is dominated by stands of California buckwheat and California sagebrush interspersed with weedy species, patches of bare and rocky ground, and human debris. A stand of laurel sumac occurs on the eastern side of the project site where a homeless encampment and associated trash and debris were observed.



## Upland Woodland Vegetation Community

### *Eucalyptus Woodland (79100)*

Eucalyptus woodland habitat ranges from single-species thickets with little or no shrubby understory to scattered trees over a well-developed herbaceous and shrubby understory. Eucalyptus woodland often forms a dense stand with a closed canopy. *Eucalyptus* species produce a large amount of leaf and bark litter, the chemical and physical characteristics of which limit the ability of other species to grow in the understory, decreasing floristic diversity. Overstory composition is typically limited to one species of the genus or mixed stands composed of several *Eucalyptus* species; few native overstory species are present in eucalyptus-planted areas except in small cleared pockets. Eucalyptus woodland in the County typically has a naturalized understory (not maintained or otherwise landscaped or developed) or occurs in association with native vegetation communities.

Approximately 0.11 acre of eucalyptus woodland occurs on the central portion of the project site (Figure 5). One blue gum eucalyptus is on the eastern side of the project site. On the project site, eucalyptus woodland is dominated by blue gum eucalyptus and non-native weeds and grass species in the understory.

## Developed/Disturbed Vegetation Community

### *Developed Land (12000)*

Developed land consists of areas that have been constructed on 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. Areas where no natural land is evident due to a large amount of debris or other materials being placed on it may also be considered developed (e.g., car recycling plant, quarry).

Approximately 0.71 acre of developed land occurs in the western portion of the project site, including a gasoline station and associated parking and auxiliary structures (Figure 5). Additionally, a concrete pad with a storage structure is in the northeastern portion of the project site (Figure 5).

### *Disturbed Habitat (11300)*

Disturbed habitat consists of previously disturbed areas that either are devoid of vegetation (dirt roads/trails) or support scattered non-native species such as mustard (*Brassica* sp.), wild radish (*Raphanus sativus*), sweet fennel (*Foeniculum vulgare*), tumbleweed (*Salsola tragus*), and thistle (*Centaurea* spp.). While these species are non-native, they are not considered to be invasive species because they are typically found along the borders between native and naturalized vegetation communities and disturbed areas and do not typically out-compete adjacent vegetation communities.

Approximately 0.36 acre of disturbed habitat occurs in the northeastern and southern portions of the project site (Figure 5). These disturbed habitat areas are dominated by mustard, thistles, telegraph weed (*Heterotheca grandiflora*), and riggut brome (*Bromus diandrus*).

## Sensitive Species

Based on a list compiled through the CNDDDB (CDFW 2021a), USFWS Information for Planning and Consultation report (USFWS 2021a), CNPS (2021), San Diego Management and Monitoring Program online database (SDMMP 2021), Biogeographic Information and Observation System (CDFW 2021b), and County MSCP (County of San Diego 2008), nine sensitive plant species and 35 sensitive wildlife species have been documented within a 3-mile radius of the project site (Attachment 3). No critical habitat for sensitive plant or wildlife species occurs on the project site or within 1 mile of the project site.

## Plant Species

Based on the literature and database review, nine sensitive plant species were considered for potential to occur on the project site (Attachment 3). No suitable habitat for San Diego thornmint (*Acanthomintha ilicifolia*), a small annual herb requiring clay soils near vernal pools in grassy openings of coastal sage scrub and chaparral, occurs on the project site. Therefore, there is no potential for this sensitive plant species to occur on the project site.

The following determinations were made for the other eight sensitive plant species:

- One sensitive plant species was determined to have a moderate potential to occur on the project site: San Diego ambrosia (*Ambrosia pumila*).
- Seven sensitive plant species were determined to have a low potential to occur on the project site. Details on these species is provided in Attachment 3.

### *Sensitive Plant Species Occurring on the Project Site*

No sensitive plant species were observed on the project site during the rare plant surveys conducted in February and April 2020. No sensitive plant species were determined to have a high potential to occur on the project site. San Diego ambrosia, the only sensitive plant species that has a moderate potential to occur on the project site, is described in further detail in the following subsection.

### *Sensitive Plant Species with a Moderate Potential to Occur on the Project Site*

#### San Diego Ambrosia

San Diego ambrosia, a federally endangered, CRPR 1B.1, and County List A species, is a perennial rhizomatous herb in the sunflower family. San Diego ambrosia occurs in chaparral, coastal scrub, grassland, and vernal pools in limited distribution in Southern California and Baja California, Mexico. This species is found in sandy loam or clay soils, often in disturbed, sometimes alkaline areas with an elevation range from 60 to 1,360 feet. The blooming period of San Diego ambrosia is generally April through October. San Diego ambrosia is considered to be restricted to 16 known populations (USFWS 2010).

Suitable disturbed Diegan coastal sage scrub habitat with small pockets of higher quality Diegan coastal sage scrub habitat surrounded by development occurs on the project site. Populations of San Diego ambrosia were documented in 2012, one approximately 2.8 miles northwest of the project site and three 2.5 miles southwest of the project site. San Diego ambrosia was not observed on the project site during the February and April 2020 rare plant surveys conducted during the appropriate blooming period for the species.

## Wildlife Species

Based on the literature and database review, 35 sensitive wildlife species were considered for potential to occur on the project site.

The following determinations were made for the sensitive wildlife species:

- Four sensitive wildlife species were observed on the project site: Cooper's hawk, monarch butterfly, red-shouldered hawk, and turkey vulture.
- No sensitive wildlife species were determined to have a high potential to occur on the project site.
- Three sensitive wildlife species were determined to have a moderate potential to occur: Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), southern mule deer (*Odocoileus hemionus*), and western mastiff bat (*Eumops perotis californicus*).
- In total, 28 sensitive wildlife species were determined to have a low potential to occur. Details on these species are provided in Attachment 3.

Sensitive wildlife species that were observed on the project site are described in further detail in the following subsections.

## *Sensitive Wildlife Species Observed on the Project Site*

### Cooper's Hawk

The Cooper's hawk is a CDFW Watch List, County MSCP, and County Group 1 species. It is a medium-sized hawk with rounded wings and a long tail with a rounded tip. Adults are blue-gray above with reddish bars on their underparts and a thickly banded tail (Cornell Lab of Ornithology 2021). It inhabits most wooded parts of California year-round at elevations from sea level to above 9,000 feet above mean sea level. Cooper's hawk prefers dense coast live oak forests or riparian forests and woodlands, often near water. It hunts small birds from perches in dense cover during nesting season and will pursue prey through the branches. Cooper's hawk may also take small mammals, reptiles, and amphibians. It constructs platform nests made of sticks in the crotches of deciduous trees and occasionally on horizontal branches of coniferous trees. Nests are generally 20 to 50 feet above the ground (Cornell Lab of Ornithology 2021).

Two adult Cooper's hawks were observed flying above the project site, landing in on-site blue gum eucalyptus and in other tall trees surrounding the project site. One Cooper's hawk nest was observed in a blue gum eucalyptus at a height of approximately 20 feet in the eastern portion of the project site (Figure 6).

### Red-Shouldered Hawk

The red-shouldered hawk is a County Group 1 species. Red-shouldered hawk is a medium-sized hawk with rounded wings and medium-length fan-shaped tails. Adults have a reddish barring on their breasts with white and dark checkered wings and a thickly barred tail (Cornell Lab of Ornithology 2021). It is found along the length of the coast and Central Valley in California. The red-shouldered hawk generally inhabits low-elevation woodlands with tall trees. It hunts by gliding below the canopy and feeds on a wide variety of prey including small mammals, reptiles, amphibians, young or small birds, and large insects. Adults construct large stick nests about halfway up a large tree, next to the main tree trunk, or on top of old squirrel, hawk, or raven nests (Cornell Lab of Ornithology 2021).

Three adult red-shouldered hawks were observed flying over the project site. No active red-shouldered hawk nests were observed on the project site.

### Turkey Vulture

The turkey vulture is a County Group 1 species. The turkey vulture is a large raptor with a distinctive bald, red head. When soaring, their wings make a V-shape when viewed head-on (Kirk and Mossman 1998). It is found throughout most of California during the breeding season, with its range contracting to the central and southern coasts during the winter. Turkey vultures feed primarily on carrion and are often observed soaring many miles over open habitat. It nests in crevices in large rocky outcroppings or cliffs (Kirk and Mossman 1998). Full nests are not constructed and turkey vultures feed by regurgitating and rarely visit the nest. Therefore, it is difficult to detect turkey vulture nests and their local breeding distribution is poorly understood.

At least three turkey vultures were observed flying above the project site. No suitable nesting habitat occurs on the project site.

### Monarch Butterfly

The monarch butterfly is a County Group 2 species and is under review for protection under the federal Endangered Species Act as of March 2020 (USFWS 2021c). Monarch butterflies in North America are divided into two main groups: the western monarchs, which breed west of the Rocky Mountains and overwinter in Southern California, and the eastern monarchs, which breed in the Great Plains and Canada and overwinter in Central Mexico. Female monarch butterflies lay each egg individually on a leaf of a milkweed plant (*Asclepias* sp.). Once monarch caterpillars are hatched, caterpillars feed exclusively on milkweed for approximately 2 weeks when they begin the metamorphosis stage.

One adult monarch butterfly was observed flying through the project site during the biological resources survey. No milkweed patches occur on the project site that would be suitable for monarch butterfly caterpillars to occupy.

### Nesting Birds

The project site provides nesting habitat for several bird species, including raptors, which are protected under the California Fish and Game Code and MBTA. Several active nests were observed during the biological resources survey.

As discussed in previous sections, an active Cooper's hawk nest was observed in a blue gum eucalyptus in the eastern portion of the project site. Two adult Cooper's hawks were observed flying around and over the site, and although these individuals were not observed landing on the nest, it is likely the two individuals are a breeding pair and are actively using the nest. Although no other active nests were observed during the biological resources survey, the upland habitat on the site and mature trees on and surrounding the project site provide nesting habitat for many avian species. In addition, the abundance of species and overall number of birds observed during the breeding season suggests the survey area is highly used as nesting habitat.

### Jurisdictional Wetlands and Waterways

The USFWS NWI search conducted for the project site and surrounding area identified one riverine and one freshwater emergent wetland approximately 0.25 mile north of the project site (USFWS 2021b). No aquatic resources were identified on the project site during the NWI search.

Approximately 0.004 acre of non-vegetated concrete-lined channel occurs on the southeast portion of the project site (Figure 5). Non-wetland waters including non-vegetated stream channels, erosional features, gullies, and concrete-lined channels occur in the southeastern portion of the project site and outside of the project site to the south and east. This concrete-lined channel is primarily associated with urban stormwater conveyed between three concrete culverts outside of the project site. The convergence of the three concrete-lined channels conveying stormwater between the three culverts is approximately 35 feet southeast and outside of the project site boundary (Figure 5). These features may be subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act (33 USC 1344), the RWQCB pursuant to Section 401 of the Clean Water Act or the Porter-Cologne Act, and the CDFW pursuant to Sections 1600 et seq. of the California Fish and Game Code. If impacts would occur to these aquatic resources, an aquatic resources delineation of the potential jurisdictional resource may be required.

### Other Unique Features/Resources

#### Plant Species

A total of 82 plant species were observed on the project site during the 2020 biological surveys, 34 (41 percent) of which were native and 48 (59 percent) of which were non-native. Attachment 2 presents the list of plant species observed.

#### Wildlife Species

A total of 31 wildlife species were observed on the project site during the biological surveys, 30 were native and 1, Argentine ant (*Linepithema humile*), was non-native (1 amphibian species, 16 bird species, 12 invertebrate species, 1 mammal species, and 1 reptile species). Attachment 2 presents the list of wildlife species observed.

Dominant bird species included Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), bushtit (*Psaltirparus minimus*), California scrub jay (*Aphelocoma californica*), Cooper's hawk, red-tailed hawk, house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), mourning dove (*Zenaida macroura*), and song sparrow (*Melospiza melodia*).

An active Cooper's hawk nest was observed on February 13, 2020. The nest was in a blue gum eucalyptus on the eastern edge of the project site (Figure 6). The nest was well hidden in the upper-middle portion of the blue gum eucalyptus, approximately 20 feet above the ground. Two adults were observed flying over the site, going in and out of the nest, and perching in other eucalyptus trees on and west of the project site during the biological resources survey.

One amphibian, a garden slender salamander (*Batrachoseps major major*), was observed in the northwestern disturbed portion of the project site under a wooden plank. Common butterfly species, including cabbage white (*Pieris rapae*) and painted lady (*Vanessa cardui*), were observed on the project site. One monarch butterfly, currently under review for protection under the federal Endangered Species Act, was also observed. Both native carpenter ants (*Camponotus* sp.) and invasive Argentine ants were observed in the central disturbed portion of the project site. One common mammal species, the California ground squirrel (*Spermophilus beecheyi*), was observed in the project site. The reptile species observed included the western fence lizard (*Sceloporus occidentalis*).

### Wildlife Corridors and Linkages

Wildlife corridors and habitat linkages are essential in geographically diverse settings to maintain healthy and genetically viable wildlife communities. Habitat linkages can be defined as large areas of natural open space that provide connectivity to regional biological resources wide enough to allow relatively free movement of wildlife species along multiple paths between important resources.

The project site is surrounded on all sides by residential, commercial, and a transportation corridor and is unlikely to function as a wildlife corridor or habitat linkage. Although the project site does not support regional wildlife corridors or linkages, the upland and woodland habitat areas on and surrounding the site provide live-in habitat for several common reptile, bird, invertebrate, and mammal species.

## Significance of Project Impacts and Proposed Mitigation

### Significance Criteria

Direct impacts occur when biological resources are altered or destroyed during the course of or as a result of project implementation. Examples of such impacts include removing or grading vegetation, filling wetland habitats, or severing or physically restricting the width of wildlife corridors. Other direct impacts may include loss of foraging or nesting habitat and loss of individual species as a result of habitat clearing. Indirect impacts may include elevated levels of noise or lighting, change in surface water hydrology within a floodplain, and increased erosion or sedimentation. These types of indirect impacts can affect vegetation communities or their potential use by sensitive species. Permanent impacts may result in irreversible damage to biological resources. Temporary impacts are interim changes in the local environment due to construction and would not extend beyond project-associated construction, including revegetation of temporarily disturbed areas adjacent to native habitats.

Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) defines "significant effect on the environment" as a "substantial, or potentially substantial adverse change in the environment." Appendix G of the CEQA Guidelines further indicates that there may be a significant effect on biological resources if the project would:

- a. 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 California Department of Fish and Game<sup>1</sup> or U.S. Fish and Wildlife Service.
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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<sup>1</sup> As of January 1, 2012, the California Department of Fish and Game became the California Department of Fish and Wildlife.

- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d. 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.
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

## Threshold A

### *Guidelines for Determination of Significance*

A significant impact would result if the project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or sensitive species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

This guideline for significance is taken directly from the CEQA Guidelines, Appendix G, and is based on the CEQA Guidelines definition of mandatory findings of significance (Section 15065) and of endangered, rare, or threatened species (Section 15380).

### *Analysis*

Potential impacts to sensitive plant and wildlife species are discussed in the following subsections.

#### *Sensitive Plant Species*

Rare plant surveys were conducted on February 13 and April 22, 2020. No rare plants were observed on the project site during the rare plant surveys. Therefore, implementation of the project would not result in significant impacts to sensitive plant species, and no mitigation would be required.

#### *Sensitive Wildlife Species*

The project has the potential to result in direct and indirect impacts to the CDFW Watch List, MSCP-covered, and County Group 1 listed Cooper's hawk. Two Cooper's hawks were observed flying through the site and perching in eucalyptus trees on and surrounding the project site. One Cooper's hawk nest was observed in a blue gum eucalyptus in the eastern portion of the project site. Permanent impacts to 0.11 acre of eucalyptus woodland that supports the sensitive Cooper's hawk and other nesting bird species would occur from grading and vegetation removal during construction of the project. Implementation of Mitigation Measure BIO-1 would require preconstruction nest surveys that would reduce potential direct and indirect impacts to Cooper's hawk and the Cooper's hawk nest to less than significant.

Although the County Group 1 listed red-shouldered hawk and turkey vulture were observed flying above the project site, suitable nesting habitat does not occur on the project site and direct impacts to these species would be less than significant. Due to the small and disturbed condition of the project site, it is unlikely to function as essential foraging habitat for either of these sensitive bird species, and indirect impacts would be less than significant.

One adult monarch butterfly was observed flying through the project site; however, no milkweed occurs on the project site that would support monarch butterfly caterpillars. Therefore, impacts to monarch butterfly would be less than significant.



## Nesting Birds

Project implementation has the potential to impact bird species that are protected under the MBTA and California Fish and Game Code, Section 3504. If construction is conducted during the bird-breeding season (January 15 through August 31), temporary direct impacts from disturbance and displacement of nesting birds during vegetation removal could result in significant direct impacts to bird species protected under the MBTA. Indirect impacts from construction noise and vibration during clearing, grubbing, and trenching activities, if conducted during the bird-breeding season, could result in significant indirect impacts to bird species protected under the MBTA. Implementation of Mitigation Measure BIO-1 would require general nest surveys to reduce potential direct and indirect impacts to nesting birds to less than significant.

## Threshold B

### *Guidelines for Determination of Significance*

A significant impact would result if the project would have a substantial adverse effect to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Permanent impacts to approximately 1.69 acres of sensitive Diegan coastal sage scrub (and disturbed) vegetation would occur from implementation of the project (Figure 7, Biological Resources Impacts). In accordance with the County 100-foot fuel modification impact neutral guidelines, the area within 100 feet of an existing permitted and occupied structure shall be considered “impact neutral.” The term “structure” is defined as a residence and attached garage, building or related facility that is designed primarily for human habitation or buildings designed specifically to house farm animals. Decking, fences, sheds, gazebos, and detached garages less than 250 square feet are not considered structures (County of San Diego 2010a). The fuel modification zones for the residences north and east of the project site extend onto the project site and include approximately 0.62 acre of Diegan coastal sage scrub (and disturbed) vegetation (Figure 7). Therefore, the project would result in permanent impacts to approximately 1.07 acres of sensitive Diegan coastal sage scrub (and disturbed) vegetation that would require mitigation.

Based on the County Biological Mitigation Ordinance, mitigation ratios depend on if the impact site and the mitigation site qualify as Biological Resources Core Areas (BRCAs) (County of San Diego 2010b). The project site is not designated as a BRCA. The off-site mitigation acres will be purchased through a County-approved mitigation bank that uses a mitigation site designated as a BRCA.

Table 2 shows the Diegan coastal sage scrub (and disturbed) impact acreage, impact neutral acreage, required mitigation ratio, and acreage.

**Table 2. Sensitive Vegetation Community Impacts and Mitigation**

Vegetation Community	Total Impacts (acres)	Impact Neutral (acres) <sup>1</sup>	Permanent Impacts (acres)	Mitigation Ratio	Mitigation Required (acres)	Off-Site Mitigation (acres)
Diegan coastal sage scrub (including disturbed) (32500)	1.69	0.62	1.07	1:1	1.07	1.07 <sup>2</sup>

**Notes:**

<sup>1</sup> The area within 100 feet of an existing permitted and occupied structure shall be considered “impact neutral.” The term “structure” is defined as a residence and attached garage, building or related facility that is designed primarily for human habitation or buildings designed specifically to house farm animals. Decking, fences, sheds, gazebos, and detached garages less than 250 square feet are not considered structures (County of San Diego 2010a).

<sup>2</sup> Location of BRCA-designated mitigation site to be determined.

Implementation of Mitigation Measure BIO-2 would require impacts to Diegan coastal sage scrub (and disturbed) to be mitigated using a mitigation ratio of 1:1 and occur off-site at a mitigation site that meets the County BRCA criteria.

## Threshold C

### *Guidelines for Determination of Significance*

A significant impact would result if the project would have a substantial adverse impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, and coastal) through direct removal, filling, hydrological interruption, or other means. Impacts to state or federally jurisdictional aquatic resources would be considered significant and would require permits from the U.S. Army Corps of Engineers and RWQCB. Aquatic resources delineations would be required for any impacts to potentially jurisdictional aquatic resources.

As discussed in the Results section, the convergence of the three concrete-lined channels conveying stormwater between the three culverts is approximately 35 feet southeast and outside of the project site boundary (Figure 6). These concrete-lined channels and associated riparian vegetation are not considered wetlands or preserved under the County Resource Protection Ordinances and, therefore, do not require a protective wetland buffer (County of San Diego 2010a). In addition, the project is approximately 25 feet higher in elevation from the concrete-lined channels, and grading activities would not result in impacts to the root system of the coast live oak approximately 30 feet southeast of the project site on the eastern side of the concrete-lined channel (Figure 6). Due to the project site boundary distance from the coast live oak, the project would not require root protection zones per County guidelines (County of San Diego 2010a). Therefore, no potential indirect impacts to these concrete-lined channels or associated riparian vegetation would occur from implementation of the project.

The 0.004 acre of non-vegetated concrete-lined channel in the southeastern portion of the project site would be avoided during implementation of the project (Figure 7). In addition, Mitigation Measure BIO-3 would require construction fencing demarcating the limits of project activity to avoid impacts to aquatic resources in the southeastern portion of the project site. Therefore, implementation of the project would not result in significant impacts to state or federally jurisdictional aquatic resources, and no mitigation would be required.

## Threshold D

### *Guidelines for Determination of Significance*

The project would have a significant impact on wildlife movement and nursery sites if its development interferes 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.

The project site is surrounded on all sides by residential, commercial, and transportation development and is unlikely to function as a wildlife corridor or habitat linkage. Although the upland and eucalyptus woodland habitat on the project site provides live-in habitat for several common reptile, bird, invertebrate, and mammal species, the project site does not support regional wildlife corridors or linkages. Therefore, implementation of the project would not result in significant impacts to wildlife corridors or nursery sites, and no mitigation would be required.

## Threshold E

### *Guidelines for Determination of Significance*

A significant impact would result if the project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The project would comply with the local policies or ordinances protecting biological resources identified in the County's General Plan and Lakeside Community Plan. Therefore, no impacts would occur to local policies or ordinances from implementation of the project and no mitigation would be required.

## Threshold F

### *Guidelines for Determination of Significance*

A significant impact would result if the project would conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

The project would comply with the conservation policies identified in the County Subarea Plan. Therefore, no impacts to local conservation plans would occur from the implementation of the project, and no mitigation would be required.

### *Proposed Mitigation*

The following biological resources mitigation measures will be implemented during construction.

#### *Nesting Birds*

**BIO-1: General Nest Surveys.** No grubbing, trimming, or clearing of vegetation, primarily non-native grassland species and a few shrubs, from the project site shall occur during the general bird-breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside of the general bird-breeding season, the qualified biologists, as approved by the County of San Diego, shall perform a preconstruction nesting bird survey no more than 72 hours prior to the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the affected areas. Should an active bird nest be located, the qualified biologists shall establish a buffer and direct vegetation clearing away from the nest until the project biologist has determined that the young have fledged or the nest has failed. If there are no nesting birds (including nest building or other breeding or nesting behavior) on the project site, grubbing, trimming, or clearing shall proceed.

When construction occurs during the general bird-breeding season, the qualified biologists shall conduct a weekly nest survey of the area within 100 feet of construction to survey for nesting raptors or migratory birds.

#### *Upland Habitat*

**BIO-2: Permanent Impacts to Diegan Coastal Sage Scrub.** Permanent impacts to 1.07 acres of Diegan coastal sage scrub, including disturbed Diegan coastal sage scrub, shall be mitigated at a ratio of 1:1 through the purchase of 1.07 acre-credits from an approved conservation bank that meets the County of San Diego Biological Resources Core Area criteria.

#### *Aquatic Resources Avoidance*

**BIO-3: Aquatic Resources Flagging, Fencing, and Demarcation.** The project proponents, in consultation with the qualified biologists, shall designate the limits of the construction area using fencing, signage, or stakes in the field and shall review the placement of fencing, signage, or stakes with the contractor in accordance with the construction plans. Aquatic resources and riparian areas in the southeastern portion of the project site and within 50 feet of the construction area shall be demarcated in the field and avoided by construction personnel and activity.

If impacts to the aquatic resources and riparian areas in the southeastern portion of the project site cannot be avoided, permits and authorizations shall be obtained from the U.S. Army Corps Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board as necessary. The regulatory agencies' authorizations would include impact avoidance and minimization measures and mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.

## Cumulative Impacts

Implementation of the project would contribute to the cumulative loss of biological resources in San Diego County. However, because the project site is within the San Diego MSCP Plan Area, the cumulative losses have been addressed by implementation of the County MSCP. In addition, the project impacts to sensitive wildlife species, nesting birds, Diegan coastal sage scrub, and jurisdictional aquatic resources that may contribute to a cumulatively significant impact when combined with nearby projects have been mitigated to a less than significant level with implementation of Mitigation Measures BIO-1 through BIO-3 as detailed in the previous section. Therefore, cumulative impacts would be less than significant.

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## Preparers

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If you have any questions regarding this letter report, please do not hesitate to contact me at (619) 643-0808 or [Melissa.Tu@WeAreHarris.com](mailto:Melissa.Tu@WeAreHarris.com).

Sincerely,



Melissa Tu  
Senior Biologist



Katie Laybourn  
Biologist

## Attachments

- 1, Figures
- 2, Plant and Wildlife Species Observed on the Project Site
- 3, Sensitive Plant and Wildlife Species Potential to Occur

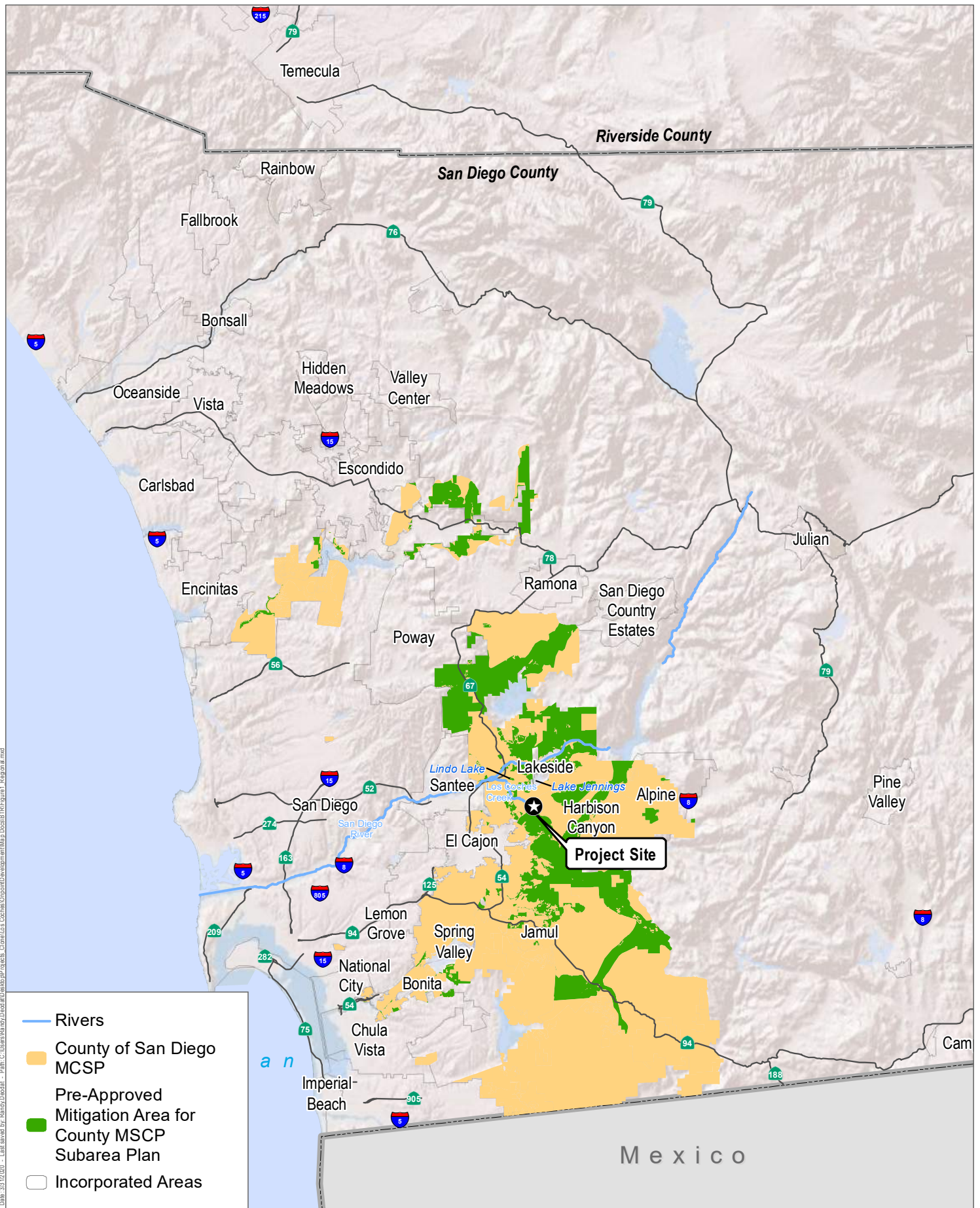
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## **Attachment 1. Figures**

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Source: ESRI 2020.



Harris & Associates



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**Figure 1**  
Regional Location





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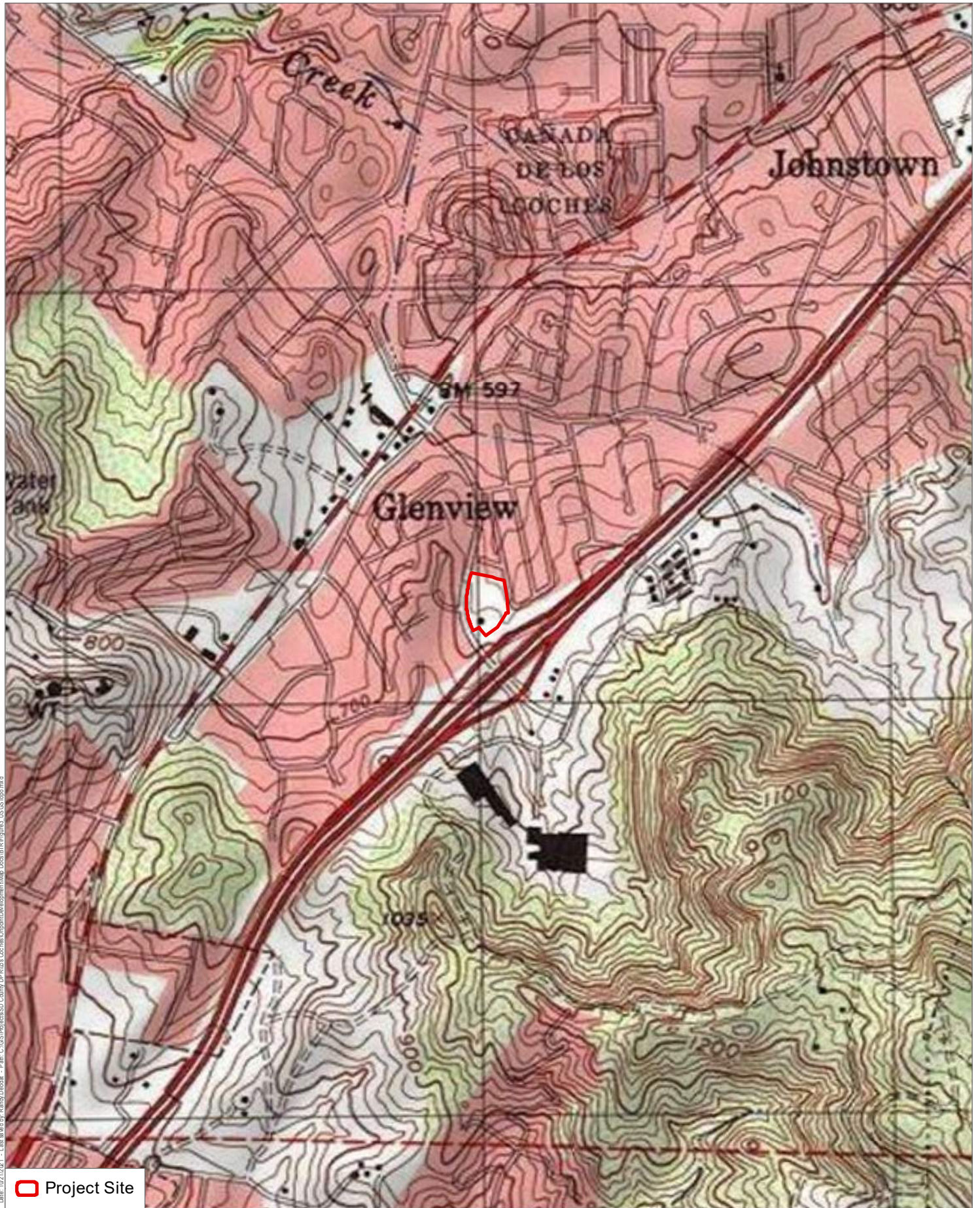
Harris & Associates



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**Figure 2**  
**Project Site**





Harris & Associates

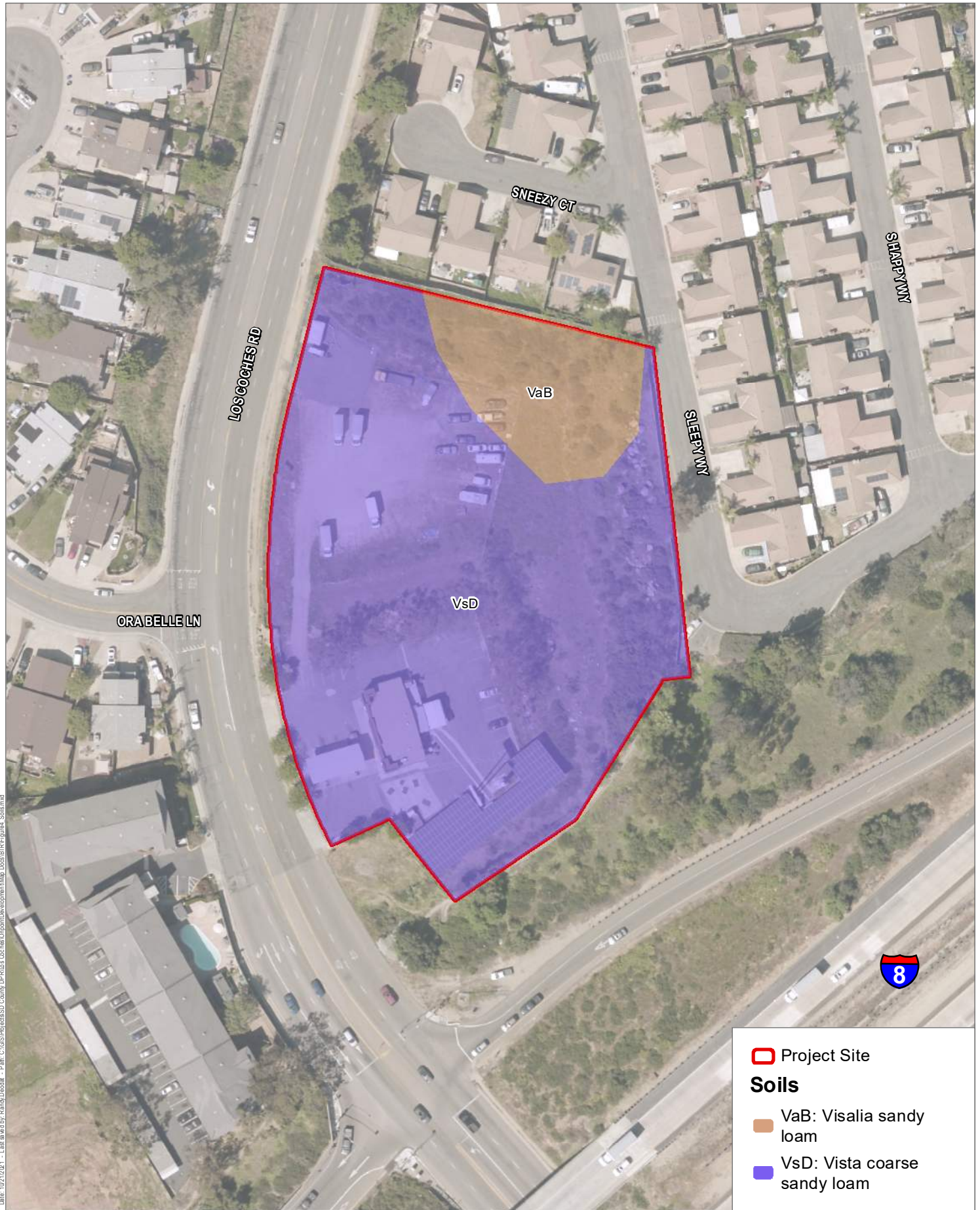


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Figure 3

USGS Topographical Map





Source: USDA 1973; SanGIS Imagery 2017.





Source: SanGIS Imagery 2017.



Harris & Associates



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**Figure 5**

Vegetation Communities





Source: SanGIS Imagery 2017.



Harris & Associates



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**Figure 6**  
Biological Resources



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Source: SanGIS Imagery 2017.



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Figure 7

Biological Resources Impacts

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## **Attachment 2. Plant and Wildlife Species Observed on the Project Site**

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### Plant Species Observed on the Project Site

Scientific Name	Common Name
<b>Dicots</b>	
<b>Adoxaceae</b>	<b>Muskroot Family</b>
<i>Sambucus nigra</i> ssp. <i>caerulea</i>	Blue elderberry
<b>Aizoaceae</b>	<b>Fig-Marigold Family</b>
<i>Carpobrotus edulis</i> <sup>1</sup>	Hottentot fig
<b>Amaranthaceae</b>	<b>Amaranth Family</b>
<i>Amaranthus blitoides</i>	Prostrate pigweed
<b>Anacardiaceae</b>	<b>Cashew or Sumac Family</b>
<i>Malosma laurina</i>	Laurel sumac
<i>Schinus molle</i> <sup>1</sup>	Peruvian peppertree
<b>Asteraceae</b>	<b>Sunflower Family</b>
<i>Artemisia californica</i>	California sagebrush
<i>Baccharis salicifolia</i>	Mulefat
<i>Baccharis sarothroides</i>	Broom baccharis
<i>Brickellia californica</i>	California brickellia
<i>Carduus pycnocephalus</i> <sup>1</sup>	Italian thistle
<i>Centaurea melitensis</i> <sup>1</sup>	Tocalote
<i>Corethrogyne filaginifolia</i>	San Diego sand aster
<i>Cotula coronopifolia</i> <sup>1</sup>	Brassbuttons
<i>Dimorphotheca sinuata</i> <sup>1</sup>	African daisy
<i>Erigeron canadensis</i>	Canada horseweed
<i>Helminthotheca echioides</i> <sup>1</sup>	Bristly ox-tongue
<i>Heterotheca grandiflora</i>	Telegraph weed
<i>Hypochaeris glabra</i> <sup>1</sup>	Smooth cat's ear
<i>Lactuca serriola</i> <sup>1</sup>	Prickly lettuce
<i>Logfia gallica</i> <sup>1</sup>	Narrow cottonrose
<i>Pseudognaphalium californicum</i>	Ladies' tobacco
<i>Pseudognaphalium microcephalum</i>	Wright's cudweed
<i>Sonchus asper</i> <sup>1</sup>	Spiny sow thistle
<b>Boraginaceae</b>	<b>Borage Family</b>
<i>Amsinckia menziesii</i>	Fiddleneck
<i>Phacelia</i> sp.	Phacelia
<i>Pholistoma racemosum</i>	San Diego fiesta flower
<b>Brassicaceae</b>	<b>Mustard Family</b>
<i>Brassica nigra</i> <sup>1</sup>	Black mustard
<i>Brassica</i> sp.	Mustard
<i>Hirschfeldia incana</i> <sup>1</sup>	Shortpod mustard
<i>Raphanus sativus</i> <sup>1</sup>	Wild radish
<i>Sisymbrium irio</i> <sup>1</sup>	London rocket

### Plant Species Observed on the Project Site

Scientific Name	Common Name
<b>Caryophyllaceae</b>	<b>Pink Family</b>
<i>Silene gallica</i> <sup>1</sup>	Common catchfly
<i>Spergularia rubra</i> <sup>1</sup>	Purple sand spurry
<i>Stellaria media</i> <sup>1</sup>	Chickweed
<b>Chenopodiaceae</b>	<b>Chenopod Family</b>
<i>Chenopodium murale</i> <sup>1</sup>	Nettle-leaf goosefoot
<i>Dysphania ambrosioides</i> <sup>1</sup>	Mexican tea
<i>Salsola tragus</i> <sup>1</sup>	Russian thistle
<b>Cistaceae</b>	<b>Rock Rose Family</b>
<i>Cistus incanus</i> <sup>1</sup>	Hairy rockrose
<b>Convolvulaceae</b>	<b>Morning Glory Family</b>
<i>Calystegia macrostegia</i>	Morning glory
<b>Crassulaceae</b>	<b>Stonecrop Family</b>
<i>Crassula connata</i>	Sand pygmy weed
<b>Cucurbitaceae</b>	<b>Gourd Family</b>
<i>Marah macrocarpus</i>	Chilicothe
<b>Euphorbiaceae</b>	<b>Spurge Family</b>
<i>Croton setigerus</i>	Doveweed
<i>Euphorbia (Chamaesyce) maculata</i> <sup>1</sup>	Spotted spurge
<b>Fabaceae</b>	<b>Legume Family</b>
<i>Acmispon americanus</i>	Spanish lotus
<i>Acmispon glaber</i>	Deerweed
<i>Acmispon heermannii</i>	Heermann's lotus
<i>Lupinus bicolor</i>	Miniature lupine
<i>Lupinus sp.</i>	Lupine
<i>Medicago polymorpha</i> <sup>1</sup>	Burclover
<i>Melilotus indicus</i> <sup>1</sup>	Annual yellow sweetclover
<i>Robinia pseudoacacia</i> <sup>1</sup>	Black locust
<i>Trifolium hirtum</i> <sup>1</sup>	Rose clover
<b>Fagaceae</b>	<b>Oak Family</b>
<i>Quercus agrifolia</i>	Coast live oak
<b>Geraniaceae</b>	<b>Geranium Family</b>
<i>Erodium botrys</i> <sup>1</sup>	Mediterranean stork's bill
<i>Erodium cicutarium</i> <sup>1</sup>	Coastal heron's bill
<b>Lamiaceae</b>	<b>Mint Family</b>
<i>Marrubium vulgare</i> <sup>1</sup>	Horehound
<b>Malvaceae</b>	<b>Mallow Family</b>
<i>Malva parviflora</i> <sup>1</sup>	Cheeseweed
<b>Montiaceae</b>	<b>Caladrine Family</b>
<i>Calandrinia menziesii</i>	Red maids

### Plant Species Observed on the Project Site

Scientific Name	Common Name
<b>Myrtaceae</b>	<b>Myrtle Family</b>
<i>Eucalyptus globulus</i> <sup>1</sup>	Blue gum
<b>Myrsinaceae</b>	<b>Myrsine Family</b>
<i>Lysimachia arvensis</i> <sup>1</sup>	Scarlet pimpernel
<b>Oxalidaceae</b>	<b>Wood-Sorrel Family</b>
<i>Oxalis pes-caprae</i> <sup>1</sup>	Bermuda buttercup
<b>Plantaginaceae</b>	<b>Plantain Family</b>
<i>Antirrhinum nuttallianum</i>	Nuttall's snapdragon
<i>Nuttallanthus texanus</i>	Texas toadflax
<i>Plantago lanceolata</i> <sup>1</sup>	English plantain
<b>Polygonaceae</b>	<b>Buckwheat Family</b>
<i>Eriogonum fasciculatum</i>	California buckwheat
<i>Rumex crispus</i> <sup>1</sup>	Curly dock
<b>Rhamnaceae</b>	<b>Buckthorn Family</b>
<i>Rhamnus ilicifolia</i>	Evergreen buckthorn
<b>Rosaceae</b>	<b>Rose Family</b>
<i>Heteromeles arbutifolia</i>	Toyon
<b>Rubiaceae</b>	<b>Madder Family</b>
<i>Galium aparine</i>	Cleavers
<b>Solanaceae</b>	<b>Nightshade Family</b>
<i>Datura wrightii</i>	Jimsonweed
<i>Nicotiana glauca</i> <sup>1</sup>	Tree tobacco
<i>Solanum nigrum</i> <sup>1</sup>	Black nightshade
<b>Tamaricaceae</b>	<b>Tamarisk Family</b>
<i>Tamarix ramosissima</i> <sup>1</sup>	Saltcedar
<b>Monocots</b>	
<b>Areaceae</b>	<b>Palm Family</b>
<i>Washingtonia robusta</i> <sup>1</sup>	Mexican fan palm
<b>Agavaceae</b>	<b>Agave Family</b>
<i>Yucca</i> sp. <sup>1</sup>	Ornamental agave
<b>Poaceae</b>	<b>Grass Family</b>
<i>Avena</i> sp. <sup>1</sup>	Wild oat
<i>Bromus diandrus</i> <sup>1</sup>	Ripgut grass
<i>Cynodon dactylon</i> <sup>1</sup>	Bermuda grass
<i>Hordeum murinum</i> <sup>1</sup>	Smooth barley
<i>Poa annua</i> <sup>1</sup>	Annual blue grass
<i>Pennisetum setaceum</i> <sup>1</sup>	Fountain grass
<i>Schismus barbatus</i> <sup>1</sup>	Old han schismus

**Notes:**

<sup>1</sup> = Non-native

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### Wildlife Species Observed on the Project Site

Family	Common Name	Scientific Name
<b>Amphibians</b>		
<b>Urodela (Salamanders)</b>		
<b>Plethodontidae</b> Lungless Salamanders	Garden slender salamander	<i>Batrachoseps major major</i>
<b>Birds</b>		
<b>Accipitriformes (Hawks, Kites, Eagles, and Allies)</b>		
<b>Accipitridae</b> Hawks, Eagles, Kites, and Allies	Red-shouldered hawk	<i>Buteo lineatus</i>
	Red-tailed hawk	<i>Buteo lineatus</i>
	Cooper's hawk <sup>1</sup>	<i>Accipiter cooperii</i>
<b>Cathartidae</b> New World Vultures	Turkey vulture	<i>Cathartes aura</i>
<b>Caprimulgiformes (Nightjars)</b>		
<b>Trochilidae</b> Hummingbirds	Anna's hummingbird	<i>Calypte anna</i>
<b>Passeriformes (Perching Birds)</b>		
<b>Aegithalidae</b> Bushtits	Bushtit	<i>Psaltiriparus minimus</i>
<b>Columbiformidae</b> Doves	Mourning dove	<i>Zenaida macroura</i>
<b>Corvidae</b> Jays, Magpies, and Crows	American crow	<i>Corvus brachyrhynchos</i>
	California scrub-jay	<i>Aphelocoma californica</i>
<b>Fringillidae</b> Finches	House finch	<i>Haemorhous mexicanus</i>
	Lesser goldfinch	<i>Spinus psaltria</i>
<b>Mimidae</b> Mockingbirds and Thrashers	Northern mockingbird	<i>Mimus polyglottos</i>
<b>Parulidae</b> Wood Warblers	Yellow-rumped warbler	<i>Setophaga coronata</i>
<b>Passerellidae</b> Passerines	California towhee	<i>Melospiza crissalis</i>
	Song sparrow	<i>Melospiza melodia</i>
<b>Troglodytidae</b> Wrens	Bewick's wren	<i>Thryomanes bewickii</i>
<b>Invertebrates</b>		
<b>Chilopoda (Insects, Arachnids, and Crustaceans)</b>		
<b>Lithobiidae</b> Centipedes	Centipede spp.	<i>Lithobius</i> spp.
<b>Salticidae</b> Jumping Spiders	Red-backed jumping spider	<i>Phidippus johnsoni</i>

### Wildlife Species Observed on the Project Site

Family	Common Name	Scientific Name
<b>Lepidoptera (Butterflies)</b>		
<b>Erebidae</b> Underwing, Tiger, Tussock, and Allied Moths	Western tussock moth	<i>Orgyia vetusta</i>
<b>Lycaenidae</b> Gossamer-Winged Butterflies	Acmon blue	<i>Icaricia acmon acmon</i>
	Coastal green hairstreak	<i>Callophrys dumetorum</i>
<b>Nymphalidae</b> Brush-Footed Butterflies	Common buckeye	<i>Junonia coenia</i>
	Painted lady	<i>Vanessa cardui</i>
	Monarch butterfly <sup>2</sup>	<i>Danaus plexippus</i>
<b>Pieridae</b> True Butterflies	Cabbage white	<i>Pieris rapae</i>
<b>Orthoptera (Grasshoppers, Locusts, and Crickets)</b>		
<b>Stenopelmatidae</b> Crickets	Jerusalem cricket	<i>Stenopelmatus fuscus</i>
<b>Hymenoptera (Ants, Bees, Wasps, and Sawflies)</b>		
<b>Formicidae</b> Ants	Carpenter ant	<i>Camponotus</i> spp.
	Argentine ant <sup>3</sup>	<i>Linepithema humile</i>
<b>Mammals</b>		
<b>Rodentia (Rodents)</b>		
<b>Sciuridae</b> Squirrels, Chipmunks, and Marmots	California ground squirrel	<i>Spermophilus beecheyi</i>
<b>Reptiles</b>		
<b>Squamata (Lizards and Snakes)</b>		
<b>Iguanidae</b> American Arboreal Lizards, Chuckwallas, and Iguanas	Western fence lizard	<i>Sceloporus occidentalis</i>

**Notes:**

- <sup>1</sup> California Department of Fish and Wildlife Watch List species
- <sup>2</sup> Under review for protection under the federal Endangered Species Act
- <sup>3</sup> Non-native

### **Attachment 3. Sensitive Plant and Wildlife Species Potential to Occur**

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### Sensitive Plant Species Potential to Occur on Site

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/CRPR/ Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
<i>Acanthomintha ilicifolia</i>	San Diego thormmint	FT/SE/1B.1/List A	Small annual herb. Occurs on clay soils near vernal pools and in grassy openings in coastal sage scrub and chaparral. Blooming period is April through June. Elevation ranges from 100 to 3,150 feet.	No Potential. No suitable clay soils occur on the project site. Additionally, no vernal pools were observed on the project site during the February 2020 biological resources survey. Three occurrences of San Diego thormmint was documented in 2018 approximately 2 miles northeast of the project site. San Diego thormmint was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.
<i>Ambrosia pumila</i>	San Diego ambrosia	FE—/1B.1/List A	Chaparral, coastal scrub, valley and foothill grassland, and vernal pools. Found in sandy loam or clay, often in disturbed areas, sometimes alkaline areas. Perennial rhizomatous herb. Blooming period is April through October. Elevation ranges from 60 to 1,360 feet.	Moderate. Suitable disturbed Diegan coastal sage scrub habitat surrounded by higher-quality Diegan coastal sage scrub habitat surrounded by development occurs on the project site. Populations of this species were documented in 2012, one located approximately 2.8 miles northwest of the project site and three located 2.5 miles southwest of the project site. San Diego ambrosia was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.
<i>Artemisia palmeri</i>	San Diego sagewort	—/—/4.2/List D	Chaparral, coastal scrub, riparian forest, scrub, and woodland. Found in sandy, mesic soils. Deciduous shrub. Blooming period is May through September. Elevation ranges from 50 to 3,000 feet.	Low. Low-quality disturbed Diegan coastal sage scrub habitat surrounded by a small edge of suitable Diegan coastal sage scrub habitat surrounded by development occurs on the project site. Eight occurrences of San Diego sagewort were documented approximately 1 mile southeast and 2 miles east of the project site; however, these occurrences were documented in 1991, more than 20 years ago. San Diego sagewort was not observed during the 2020 surveys.
<i>Astragalus deanei</i>	Dean's milk vetch	—/—/1B.1/List A	Chaparral, coastal sage scrub, riparian forest. Perennial herb endemic to California. Blooming period is February through May. Elevation ranges from 275 to 2,300 feet.	Low. Low-quality disturbed Diegan coastal sage scrub habitat with small pockets of suitable Diegan coastal sage scrub habitat surrounded by development occurs on the project site. One occurrence of Dean's milk vetch was documented approximately 2.5 miles south of the project site; however, this occurrence was documented in 1991, more than 20 years ago. Dean's milk vetch was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.

### Sensitive Plant Species Potential to Occur on Site

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/CRPR/ Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
<i>Ceanothus cyaneus</i>	Lakeside ceanothus	—/—/1B.2/List A, NE	Closed-cone coniferous forest and chaparral. Blooming period is April through June. Elevation ranges from 750 to 2,500 feet.	Low. No suitable coniferous forest or chaparral habitat occurs on the project site. Three occurrences of Lakeside ceanothus were documented, two in 2019 approximately 2.5 miles northeast of the project site and one in 2014 approximately 2.5 miles southeast of the project site. Lakeside ceanothus was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.
<i>Clarkia delicata</i>	Delicate clarkia	—/—/1B.2/List A	Chaparral and cismontane woodlands. Blooming period is April through June. Found in elevations ranging from 750 to 3,300 feet.	Low. No suitable chaparral or cismontane woodland habitat occurs on the project site. Four occurrences of delicate clarkia were documented in 2013, one approximately 2.5 miles southeast of the project site, two approximately 1 mile and 2.5 miles east of the project site, and one 2.5 miles northeast of the project site. Delicate clarkia was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.
<i>Ericameria palmeri</i> var. <i>palmeri</i>	Palmer's goldenbush	—/—/1B.1/List B	Chaparral and coastal scrub. Found in mesic soils. Blooming period is July through November. Elevation ranges from 100 to 2,000 meters.	Low. Low-quality disturbed Diegan coastal sage scrub habitat with small pockets of suitable Diegan coastal sage scrub habitat surrounded by development occurs on the project site. Two occurrences of Palmer's goldenbush were documented, one in 2005 approximately 1 mile south of the project site and the other in 1995 approximately 2 miles northwest of the project site. Palmer's goldenbush was not observed during the 2020 surveys.
<i>Euphorbia abramsiana</i>	Abrams' spurge	—/—/2B.2/—	Mojavean desert scrub and Sonoran desert scrub. Found in sandy soils. Blooming period is September through November. Elevation ranges from 0 to 4,300 feet.	Low. No suitable desert scrub habitat occurs on the project site. One occurrence of Abrams' spurge was documented in 2012 approximately 2.5 miles northeast of the project site. Abrams' spurge was not observed during the 2020 surveys.
<i>Isocoma menziesii</i> var. <i>decumbens</i>	Decumbent goldenbush	—/—/1B.2/List A	Perennial shrub occurring in chaparral and coastal scrub. Blooming period is from April through November. Elevation is less than 450 feet.	Low. Low quality disturbed Diegan coastal sage scrub habitat with small pockets of suitable Diegan coastal sage scrub habitat surrounded by development occurs on the project site. Two occurrences of decumbent goldenbush were documented in 2012, one approximately 0.5 mile north of the project site along the Los Coches Creek riparian corridor and the other approximately 2 miles north of the project site. Decumbent goldenbush was not observed during the 2020 surveys conducted during the blooming period with appropriate conditions.

**Notes:** — = No status indicated for species; .1 = seriously endangered; .2 = moderately endangered; 1B = Species rare, threatened, or endangered in California and elsewhere; 2B = Species rare, threatened, or endangered in California but more common elsewhere; 4 = A watch list of species of limited distribution; CRPR = California Rare Plant Rank; FE = Federally listed as endangered; FT = Federally listed as threatened; List A = County of San Diego Sensitive Plant List – rare, threatened, or endangered in California and elsewhere; List B = County of San Diego Sensitive Plant List – rare, threatened, or endangered in California but more common elsewhere; List D = County of San Diego Sensitive Plant List – watch list for species of limited distribution; NE = Narrow endemic; SE = State listed as endangered. **Bold** indicates that the species occurs on site.

<sup>1</sup> Calflora. 2020. Calflora Database. Accessed March 2020. <https://www.calflora.org/>.

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### Sensitive Wildlife Species Potential to Occur on Site

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
<b>Amphibians</b>				
<i>Spea hammondi</i>	Western spadefoot	—/SSC/MSCP, Group 2	Occurs throughout Central and Southern California, primarily in grasslands. Requires vernal pools or similar shallow, temporary pools for breeding. Adults spend the rest of the year aestivating in burrows.	Low. Small, low-quality, potential breeding habitat for western spadefoot exists just southeast of the project site near the culvert on the south side Interstate 8. Suitable habitat for western spadefoot does not occur on the project site. This species has been documented within 1 mile of the project site at locations northwest and southeast of the project site. However, these two recorded sightings occurred in high-quality habitat more than 10 years ago, and more recent sightings have not been recorded within 3 miles of the project site. Western spadefoot was not observed during the February 2020 biological resources survey.
<b>Birds</b>				
<i>Accipiter cooperii</i>	Cooper's hawk	—/WL/MSCP, Group 1	Occurs year-round throughout San Diego County's coastal slope where stands of trees are present. Found in oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests.	<b>Present. Two adult Cooper's hawks were observed flying above the project site, landing in on-site blue gum eucalyptus (<i>Eucalyptus globulus</i>) trees and in other tall trees surrounding the project site. One Cooper's hawk nest was observed at a height of approximately 20 feet in a blue gum eucalyptus located in the eastern portion of the project site.</b>
<i>Agelaius tricolor</i>	Tri-colored blackbird	BCC/SCE/MSCP, Group 1	Occurs in freshwater wetlands, in agricultural fields, and at the edges of urban areas. Foraging habitats include cultivated fields, feedlots associated with dairy farms, and wetlands. Species is a colonial nester, typically requiring open water, protected nesting	Low. No suitable foraging or nesting habitat occurs in the project site. Suitable foraging habitat for tri-colored blackbird occurs approximately 0.25 mile southeast of the project site. Potential nesting habitat occurs approximately 2 miles north of the project site at Lake Jennings. Tri-colored blackbird

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
			substrate, and foraging area with insect prey within a few kilometers of the colony.	has been documented approximately 2 miles north of the project site; however, this recorded sighting occurred more than 10 years ago, and more recent sightings have not been documented within 3 miles of the project site. Tri-colored blackbird was not observed during the February 2020 biological resources survey.
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	—/WL/MSCP, Group 1	Occurs in coastal sage scrub and sparse mixed chaparral on rocky hillsides and in canyons; also found in open sage scrub/grassy areas of successional growth. Found in San Diego County year-round.	Moderate. Suitable Diegan coastal sage scrub habitat for southern California rufous-crowned sparrow occurs in the project site. Four sightings of this species were documented approximately 1.5 miles north of the survey area in 2016. Suitable habitat for southern California rufous-crowned sparrow occurs within 1 mile to the north, northwest, and southeast of the project site. Southern California rufous-crowned sparrow was not observed during the February 2020 biological resources survey.
<i>Buteo lineatus</i>	Red-shouldered hawk	—/—/Group 1	Occurs year-round in low elevation riparian woodlands. Nests in dense riparian habitats and forages in open spaces and on the edges of mesic habitats.	<b>Present. Three adult red-shouldered hawks were observed flying over the project site. No active red-shouldered nests were observed on the project site.</b>
<i>Campylorhynchus brunneicapillus sandiegensis</i>	Coastal cactus wren	BCC/SSC/MSCP, Group 1	Occurs in coastal sage scrub with large cacti for nesting.	Low. The Diegan coastal sage scrub on the project site is not suitable for coastal cactus wren due to the lack of large cacti thickets. Potential suitable habitat occurs north and southeast of the project site. Two sightings of coastal cactus wren were documented approximately 1.5 miles north of the project site. However, these sightings were documented greater than 10 years ago. Coastal cactus wren was not observed

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
				during the February 2020 biological resources survey.
<i>Cathartes aura</i>	Turkey vulture	—/—/Group 1	Present in a wide variety of habitats, including open rangeland, agricultural land, and undeveloped areas. Nests in crevices in rock outcrops away from human development.	<b>Present. At least three turkey vultures were observed flying above the project site. No suitable nesting habitat occurs on the project site.</b>
<i>Poliioptila californica californica</i>	Coastal California gnatcatcher	FT/SSC/MSCP, Group 1	Obligate, permanent resident of coastal sage scrub below 2,500 feet in Southern California. The breeding season extends from February through August, with peak nesting activities occurring from mid-March through May.	Low. Low-quality, disturbed Diegan coastal sage scrub habitat with small pockets of suitable Diegan coastal sage scrub habitat surrounded by development occurs on the project site. In February 2020, coastal California gnatcatcher was documented on the Lakeside Centex open space property 0.5 mile northwest of the project site. Seven sightings have been documented within 3 miles north and south of the project site; however, these were documented more than 10 years ago. Coastal California gnatcatcher was not observed during the February 2020 biological resources survey.
<i>Sialia mexicana</i>	Western bluebird	—/—/Group 2	Inhabits woodlands, grasslands, scrub, deserts, and agricultural habitats throughout California. Nests in cavities in live trees, snags, and artificial substrates.	Low. Low-quality Diegan coastal sage scrub habitat and a small area of eucalyptus woodland surrounded by development occurs on the project site. Two coast live oaks, one on the project site and one approximately 20 feet south of the project site, provide potential nesting habitat for the western bluebird. No recent sightings of western bluebird have been documented within 3 miles of the project site. Western bluebird was not observed during the February 2020 biological resources survey.

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
<i>Vireo belli pusillus</i>	Least Bell's vireo	FE/SCE/MSCP, Group 1	Occurs in riparian scrub and riparian forest and is a summer resident in Southern California below 2,000 feet. Least Bell's vireo is known to feed primarily on insects and spiders.	Low. No suitable riparian habitat occurs on the project site. One least Bell's vireo sighting was documented in 2014 approximately 3 miles north in the riparian corridor along the San Diego River.
<b>Invertebrates</b>				
<i>Danaus plexippus</i>	Monarch butterfly	2/—	Occurs in patches of milkweed ( <i>Asclepias</i> sp.), the monarch caterpillar host plant. Monarch butterflies are found across North America wherever suitable feeding, breeding, and overwintering habitat exists.	Low/Present. One adult monarch butterfly was observed flying through the project site during the February 2020 biological resources survey. No milkweed patches occur on the project site that would be suitable for monarch butterfly caterpillars to occupy.
<i>Lycaena hermes</i>	Hermes copper	FSC/—/MSCP, Group 1	Occurs in patches of spiny redberry buckthorn in relation to California buckwheat that grows in southern mixed chaparral and coastal sage scrub. Hermes copper butterfly is endemic to San Diego County and northern Baja California, Mexico. This species' adult flight period is from mid-May through early July.	Low. No spiny redberry ( <i>Rhamnus crocea</i> ) was documented on the project site. A patch of California buckwheat ( <i>Eriogonum fasciculatum</i> ) occurs in the northern portion of the project site. This species was documented in 2005 and 2012 approximately 0.5 mile south of the project site in the open space south of Interstate 8.
<b>Mammals</b>				
<i>Antrozous pallidus</i>	Pallid bat	—/SSC/MSCP, Group 2/WBWG: H	Occupies grasslands, shrublands, woodlands, and forests in low elevations in California. This species occurs throughout California in open, dry habitats with rocky areas for roosting. Pallid bat requires protected areas for day roosting, including caves, crevices, and hollow trees and may roost at night in more open sites, including buildings.	Low. No caves, cliffs, or rock ledges suitable roosting habitat occurs on the project site. One sighting of pallid bat was documented in 2006 approximately 2 miles north along the San Diego River.
<i>Chaetodipus californicus femoralis</i>	Dulzura pocket mouse	—/SSC/Group 2	Inhabits coastal sage scrub, chaparral, grassland, and desert scrub with sandy soils in Southern California. Found at elevations from sea level to 6,000 feet above mean sea level. Primarily a nocturnal granivore.	Low. Suitable coastal sage scrub and grassland habitat exists on the project site; however, the project site is surrounded by development and the interstate-8 corridor. One sighting of Dulzura pocket mouse was



### Sensitive Wildlife Species Potential to Occur on Site

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
				documented in 2004 approximately 0.6 mile south of the project site in the San Diego County open space preserve area.
<i>Chaetodipus fallax fallax</i>	Northwestern San Diego pocket mouse	—/SSC/Group 2	Found in Southern California to central Baja California within sandy, herbaceous areas. Primarily a nocturnal granivore.	Low. Limited suitable sandy, herbaceous areas occur on the project site. However, the project site is surrounded by development. One sighting of northwestern San Diego pocket mouse was documented in 2004 approximately 0.6 mile south of the project site in the San Diego County open space preserve area.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	FSC/SSC/MSCP, Group 2/ WBWG: H	Inhabits habitats with limited desert scrub vegetation, but stops short of living in extreme desert environments. Roosting sites commonly in caves, cliffs, and rock ledges but have been found in abandoned mines and other human-made structures.	Low. No caves, cliffs, or rock ledges suitable roosting habitat occur on the project site. One sighting of Townsend's big-eared bat was documented in 2016 approximately 3 miles southwest of the project site.
<i>Eumops perotis californicus</i>	Western mastiff bat	—/SSC/Group 2/ WBWG: H	Inhabits coniferous and deciduous woodlands, coastal scrub, grasslands, chaparral, desert scrub, palm oases, and urban land from Monterey County south into Baja California. Roosts in crevices on cliff faces, high buildings, trees, and tunnels.	Moderate. Suitable foraging habitat occurs on the project site. Large trees suitable for roosting by western mastiff bat occur in the center and surrounding the project site. Two sightings of western mastiff bat were documented in 2008, one approximately 2.5 miles southwest of the project site and the other approximately 3 miles east of the project site.
<i>Lasiurus xanthinus</i>	Western yellow bat	—/SSC/—/WBWG: M	Found in riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	Low. No suitable habitat occurs on the project site. Potentially suitable roosting habitat occurs in the open riparian woodland southeast of the project site; however, this area is surrounded by development and the Interstate 8 corridor. One sighting of the western yellow bat was

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
				documented in 2004 approximately 1.5 miles northwest of the project site.
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	FSC/SSC/MSCP, Group 2	Inhabit desert scrubland, prairies, farmlands, and dunes. Favor arid regions and areas of short grass rangeland from sea level to about 3,800m. Many different vegetation types are used, including sagebrush-creosote bush, mesquite-snakeweed, and juniper-big sagebrush. They also frequent agricultural areas where they can impact fruit and grain crops.	Low. No suitable habitat occurs on the project site. Two sightings of San Diego black-tailed jackrabbit have been documented, one in 2004 approximately 2.5 miles northwest of the project site, and the other in 2003, approximately 1.5 miles north of the project site. San Diego black-tailed jackrabbit was not observed during the February 2020 biological resources survey.
<i>Myotis ciliolabrum</i>	Western small-footed myotis	—/—/—/WBWG: M	Western small-footed myotis inhabits arid wooded and brushy uplands near water in coastal and desert California. This species occurs in elevations below 8,900 feet. Western small-footed myotis seeks cover in caves and built structures, including buildings, mines, and bridges.	Low. No caves, mines, or bridges suitable for roosting habitat occur on the project site. One sighting of western small-footed myotis was documented in 2008 approximately 2.5 miles west of the project site in the San Diego County open space preserve area.
<i>Myotis yumanensis</i>	Yuma myotis	—/—/Group 2/ WBWG: LM	Inhabits open woodlands adjacent to water for foraging. Occurs throughout California but is uncommon in the deserts and elevations above 8,000 feet above mean sea level. Nocturnal insectivore that roosts in crevices, caves, mines, and underneath bridges.	Low. No suitable habitat occurs on the project site. Potentially suitable roosting habitat occurs in the open riparian woodland southeast of the project site; however, this area is surrounded by development and the Interstate 8 corridor. One sighting of the Yuma myotis was documented in 2008 approximately 2.5 miles northeast of the project site.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	—/SSC/Group 2	Occurs throughout Southern California and coastal Central California in chaparral, sagebrush, and desert habitats. Builds large, conspicuous houses against rock crevices, at the base of a large shrub, or in the lower branches of a tree.	Low. Limited suitable Diegan coastal sage scrub habitat is present on the project site, and the project site is surrounded by development and the Interstate 8 corridor. Two sightings of San Diego desert woodrat were documented in 2009, one 0.5 mile southwest of the project site and the other

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
				approximately 1.5 miles southwest of the project site. San Diego desert woodrat was not observed during the February 2020 biological resources survey.
<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	—/SSC/Group 2/WBWG: M	Roosts colonially in crevices on steep cliffs, rocky outcrops, and caves and buildings. Feeds on insects nocturnally.	Low. No caves, cliffs, or rock ledges suitable roosting habitat occur on the project site. Three sightings of pocketed free-tailed bat have been documented, two in 2007 approximately 1.5 miles north of the project site and one in 2008 2.5 mile northeast of the project site.
<i>Nyctinomops macrotis</i>	Big free-tailed bat	—/SSC/—/WBWG: M	Inhabits rugged, rocky terrain up to 8,000 feet in elevation. This species is rare in California and is primarily found in New Mexico, southern Arizona, and Texas.	Low. No suitable habitat occurs on the project site, and the project site is not within the big free-tailed bat's typical elevation range. One sighting of big free-tailed bat was documented in 2005 approximately 2.5 miles northwest of the project site.
<i>Odocoileus hemionus</i>	Southern mule deer	—/—/Group 2	Found in grasslands, woodlands, and sparse shrub communities throughout California.	Moderate. Suitable habitat exists on the project site. Southern mule deer sightings and sign have been documented in 2018 and prior within 3 miles of the project site. Southern mule deer was not observed during the February 2020 biological resources survey.
<i>Puma concolor</i>	Mountain lion	—/—/MSCP, Group 2	Inhabits a variety of habitats throughout California. Rests in rocky areas and on cliffs or ledges that provide cover. Apex predator.	Low. No suitable rocky cliffs or ledges that could provide habitat occurs on the project site. No sightings of mountain lion have been recorded within 3 miles of the project site.
<i>Taxidea taxus</i>	American badger	—/SSC/ MSCP, Group 2	Occurs in open areas including plains and prairies, farmland, and the edges of woods throughout the western United States, ranging southward through mountainous parts of Mexico and northward through Canada's central western provinces. Primarily	Low. No suitable habitat occurs on the project site, which is surrounded by development and the Interstate 8 corridor. One American badger sighting was documented in 2016 approximately 2 miles

**Sensitive Wildlife Species Potential to Occur on Site**

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
			nocturnal and uses multiple burrows within its home area.	southeast of the project site in the San Diego County open space preserve area.
<b>Reptiles</b>				
<i>Anniella stebbinsi</i>	Southern California legless lizard	—/SSC/Group 2	Occurs throughout cismontane California in coastal dune, valley-foothill, chaparral, and coastal scrub habitats. Burrows in shallow soil or leaf litter near the base of shrubs.	Low. Suitable coastal sage scrub habitat occurs on the project site; however, the site has been previously disturbed and is surrounded by development. Five sightings of this species were documented in 2018, three approximately 1.5 miles north of the project site, one approximately 1.5 miles southwest of the project site, and 2.5 miles southeast of the project site.
<i>Arizona elegans occidentalis</i>	California glossy snake	—/SSC/—	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the California Coast, Transverse, and Peninsular Ranges south to Baja California. Found in arid scrub, grasslands, chaparral, and rocky areas.	Low. Suitable sage scrub habitat occurs on the project site; however, the project site has been previously disturbed and is surrounded by development. One sighting of this species has been documented approximately 2,000 feet northwest of the project site.
<i>Aspidoscelis hyperythrus</i>	orange-throated whiptail	—/WL/MSCP, Group 2	Coastal sage scrub, chaparral, edges of riparian woodlands, and washes. Also, found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant insect prey base, particularly termites ( <i>Reticulitermes</i> sp.).	Low. Suitable sage scrub habitat occurs on project site; however, the project site has been previously disturbed and is surrounded by development. Several sightings of this species have been documented on the San Diego County Lakeside Centex open space property approximately 0.5 mile northwest of the project site. Several other sightings have been documented in 2016 approximately 1.5 miles north of the project site.
<i>Aspidoscelis tigris stejnegeri</i>	coastal whiptail	—/SSC/Group 2	Open coastal sage scrub, chaparral, and woodlands. Frequently found along the edges of dirt roads traversing its habitats. Important habitat components include open, sunny areas, shrub cover with	Low. Suitable sage scrub habitat occurs on the project site; however, the project site has been previously disturbed and is surrounded by development. One sighting of this species was documented in 1995

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			accumulated leaf litter, and an abundance of insects, spiders, @@@or scorpions.	approximately 3 miles north of the project site along the San Diego River.
<i>Coleonyx variegatus abbotti</i>	San Diego banded gecko	—/SSC/—	Occurs in rocky areas and grassing openings in coastal sage scrub.	Low. Suitable rocky areas and coastal sage scrub habitat occurs on project site; however, the project site has been previously disturbed and is surrounded by development. Three sightings of this species were documented in 2017 approximately 2.8 miles north of the project site.
<i>Crotalus ruber</i>	Red-diamond rattlesnake	—/SSC/MSCP, Group 2	Inhabits dense coastal sage scrub, chaparral, woodlands, and desert habitats from sea level to 3,000 feet above mean sea level in San Diego, Riverside, and San Bernardino counties. It usually occurs in rocky areas or areas with abundant rodent burrows or other forms of cover.	Low. Suitable rocky areas and coastal sage scrub habitat occurs on project site; however, the project site has been previously disturbed and is surrounded by development. No recent occurrences have been documented for red-diamond rattlesnake within 3 miles of the project site.
<i>Phrynosoma blainvillii</i>	Coast (Blainville's) horned lizard	—/SSC/MSCP, Group 2	Occurs in coastal sage scrub, chaparral, and grasslands in primarily loose soils in San Diego County. Forages primarily on harvester ants.	Low. Suitable sage scrub habitat occurs on the project site; however, the project site has been previously disturbed and is surrounded by development. Two sightings of this species were documented in 2011 approximately 1.5 miles northwest and 2.5 miles northeast of the project site. Two other sightings of this species were documented in 2012 approximately 2 miles southeast of the project site. Harvester ants were observed on the project site; however, coast (Blainville's) horned lizard was not observed on the project site during the February 2020 biological resources survey.



### Sensitive Wildlife Species Potential to Occur on Site

Scientific Name	Common Name	Status <sup>1</sup> Federal/State/Regional	Habit, Ecology, and Life History <sup>1</sup>	Potential to Occur <sup>1</sup>
<i>Plestiodon skiltonianus interparietalis</i>	Coronado skink	—/SSC/Group 2	Occurs in coastal sage scrub, grasslands, and woodlands near the edges of creeks and streams in San Diego County. Primarily feeds on arthropods. Intergrades with Skilton's skink ( <i>Plestiodon skiltonianus skiltonianus</i> ) in northern San Diego County.	Low. Suitable coastal sage scrub habitat exists on the project site; however, the project site has been previously disturbed and is surrounded by development. Three sightings of Coronado skink were documented approximately 1.5 miles north of the project site; however, these were recorded more than 15 years ago. Suitable coastal sage scrub and woodland exists in the survey area; however this species was not observed during the February 2020 biological resources survey.

**Notes:** — = No status indicated for species; BCC = Bird of Conservation Concern; FE = Federally listed as endangered; FSC = Federal species of concern; FT = Federally listed as threatened; Group 1 = Group 1 Species on County of San Diego Sensitive Animal List; Group 2 = Group 2 Species on County of San Diego Sensitive Animal List; MSCP = North County Multiple Species Conservation Program Covered Species; SCE = State candidate for listing as endangered; SSC = Species of concern; WL = Watch list; WBWG: Western Bat Working Group, H: High, HM: High–Medium, M: Medium, LM: Low–Medium, L: Low

**Bold** indicates that the species occurs on site.

<sup>1</sup> **Sources:** Californiaherps.com. 2020. "California Herps." Accessed March 2020. <http://californiaherps.com/>.

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<sup>2</sup> Under review for protection under the federal Endangered Species Act.