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September 17, 2024

Rincon Project No. 20-10438

Steve L'Hommedieu

Senior Living/Multi-family West Coast Manager

ARCO Construction Company, Inc.

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St. Louis, Missouri 63119

Subject: Revised Biological Resource Letter Report for the Bradley Court Convalescent Center Expansion Project in San Diego County, California (Project Number PDS2021-MUP-85-053W2)

Dear Mr. L'Hommedieu:

Rincon Consultants, Inc. (Rincon) is pleased to provide this Revised Biological Resource Letter Report (Letter Report) for the proposed expansion of the existing Bradley Court Convalescent Center (project site). This report was prepared under the direction of Steven J. Hongola, County of San Diego Approved California Environmental Quality Act Consultant.

A handwritten signature in black ink that reads 'Steven J. Hongola'.

Steven J. Hongola

Principal Biologist

Prepared for the County of San Diego

**SDC PDS RCVD 09-24-24
MUP85-053W2**



Summary

This Letter Report has been prepared to provide baseline biological conditions at the proposed Bradley Court Convalescent Center Expansion Project (project) site. In accordance with the County of San Diego Report Format and Content Requirements (County of San Diego 2010), this Letter Report describes and documents the existing biological resources in terms of vegetation communities/land covers, plants, and wildlife from the field reconnaissance survey performed by Rincon on November 11, 2021. This Letter Report describes the potential for sensitive biological resources to be present; potential project impacts to these special-status biological resources; and recommended avoidance and mitigation measures, if needed.

The proposed project involves expanding the existing Bradley Court Convalescent Center to construct a new 26,515 square-foot assisted living building with 66 resident beds, and a new 10,613 square-foot 31-bed skilled nursing building. The total project site would include four buildings with 87 skilled nursing beds and 66 transitional care beds, for a total of 153 beds. The project site is mostly developed and disturbed and contains ornamental landscaping. The natural habitat value of the project site and its immediate surroundings is limited. As a result, special-status species are not expected to be present on the project site and no project impacts to species-status species would occur. The ornamental vegetation present on the project site could potentially support protected, native nesting birds. Implementation of a pre-construction nesting bird survey within three days prior to the start of vegetation removal, ground disturbance, and other associated construction activities by a qualified avian biologist and establishing an appropriate avoidance buffer until the nestlings have fledged if an active nest is found, would help ensure avoidance of potential project impacts to nesting birds.

Introduction

Project Description

The proposed project involves expanding the existing Bradley Court Convalescent Center to construct a new 26,515 square-foot assisted living building with 66 resident beds, and a new 10,613 square foot 31-bed skilled nursing building. The existing residential building would be converted to a controlled access building. The total project site would include four buildings with 87 skilled nursing beds and 66 transitional care beds, for a total of 153 beds. The proposed sitework will include 73 parking spaces, and a new fire lane access road allowing access to the rear of existing Building 2 and the new Building 3. A new driveway approach along Bradley Avenue will be placed for full fire truck access. New sewer, domestic water, and fire water (including one additional fire hydrant) will be provided with the sitework. Two trash enclosures for refuse and recycled goods will be provided. Along with new landscaping throughout the facility, site lighting will be installed to provide a minimum of 1.0 FC of lighting along all egress paths to the public way.

Project construction would begin in February 2024 and be completed by April 2025. The project is assumed to be operational in 2026.



Project Location

The project site occurs within an urbanizing portion of San Diego County. The project site is located at 675 East Bradley Avenue (32.818319 N, -116.952325 W) in the Lakeside Community Plan Area within unincorporated San Diego County, immediately southwest of the City of El Cajon boarder. The project site is shown on the *El Cajon South, California* 7.5-minute United States Geological Survey (USGS) topographic quadrangle map, in Township 15 South, Range 1 West, Section 35 (Figure 1) (USGS 2021). Elevation on site ranges from approximately 434 to 462 feet (132 to 140 meters) above mean sea level. The project site is approximately 3,000 feet southeast of Gillespie Field and lies on a 3.4-acre parcel (located on Assessor's Parcel Number 387-142-3600). The project site is bordered by Sams Hill Road to the west and East Bradley Avenue to the north (Figure 2). Residential development is located to the east and south of the project site.

Geographical Setting

The site occurs within an urban/developed setting with a special care facility, a driveway off of East Bradley Avenue, and a parking lot, along with cleared ground and ornamental trees and shrubs. The ornamental trees and shrubs, seen from aerial satellite imagery, were identified in the recent field survey and are primarily located on the edges of the project site (Figure 2).

Regional Context

The project site is located in the North Metro-Lakeside-Jamul Segment of the South County Multiple Species Conservation Program (MSCP) Subarea Plan (Figure 3). The project site is not within or near an area designated for conservation (County of San Diego 1998), nor is the project site within a Biological Core Area or Biological Linkage Area. The surrounding area is characterized by urban residential and commercial development (Figure 2). The project site is approximately 0.6 mile north of the Broadway Channel, which conveys flows into Forester Creek, which then conveys flows into the San Diego River. The project site is therefore located in the San Diego River watershed.

Methodology

The purpose of this revised Letter Report is to identify and document the general site characteristics, including habitat types, likelihood of sensitive resources to be present on site, and determine potential impacts to special-status biological resources. This revised Letter Report is based on a desktop analysis as well as the results from the field reconnaissance-level biological survey of the site performed by a Rincon biologist. The methods employed are described in detail below. The findings and opinions conveyed in this revised report are based on this methodology.

Regulatory Setting

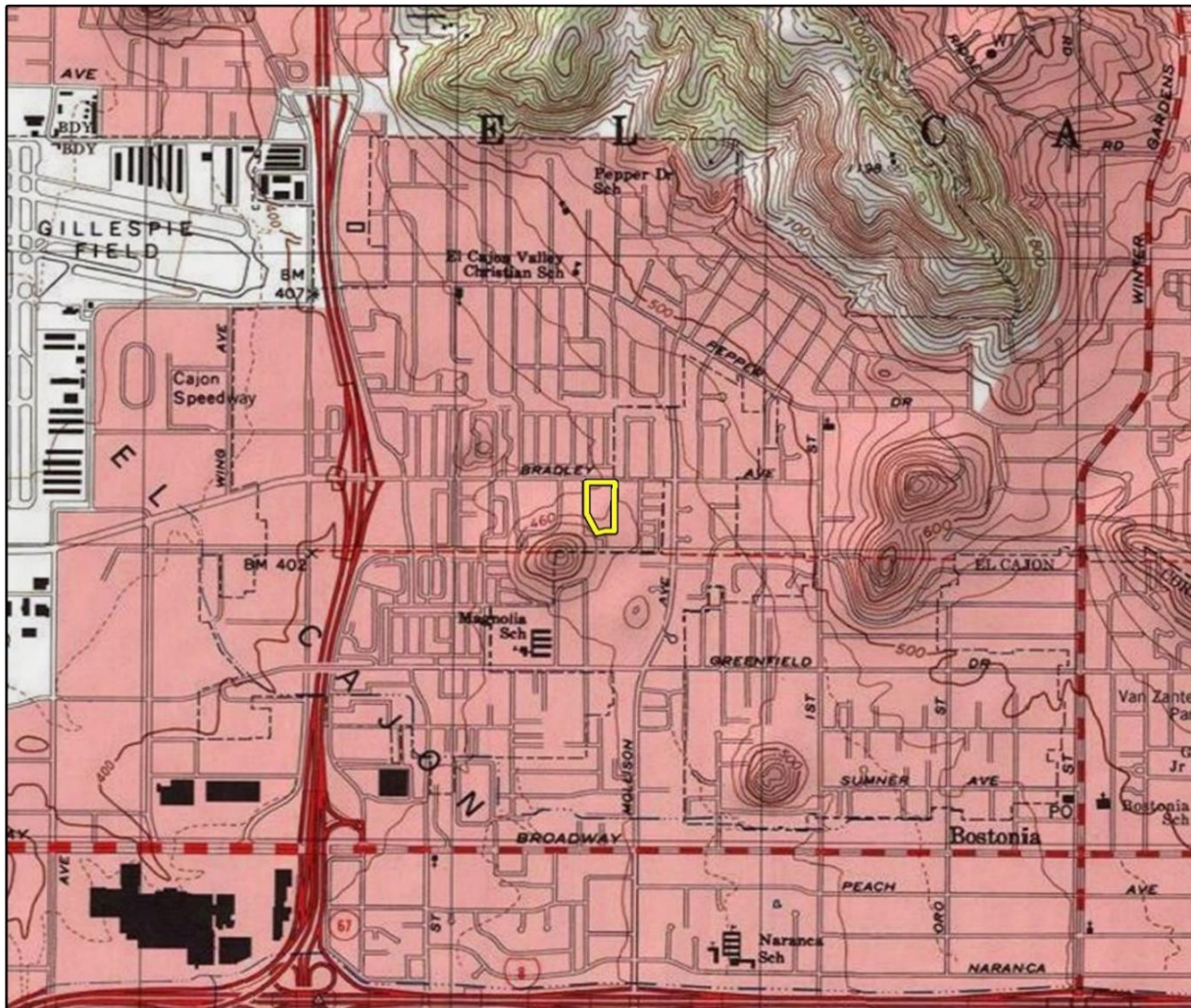
This section provides a general summary of the applicable federal, state, and local regulations related to biological resources that could occur within the project site. Regulated or sensitive biological resources considered and evaluated in this Letter Report include special-status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
Convalescent Center Expansion Project**

The County of San Diego is the lead agency for this project under the California Environmental Quality Act (CEQA).

Figure 1 Project Vicinity



Basemap provided by National Geographic Society, Esri and its licensors © 2021. El Cajon South Quadrangle. T15S R01W S35. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

 Project Location

0 1,000 2,000 Feet



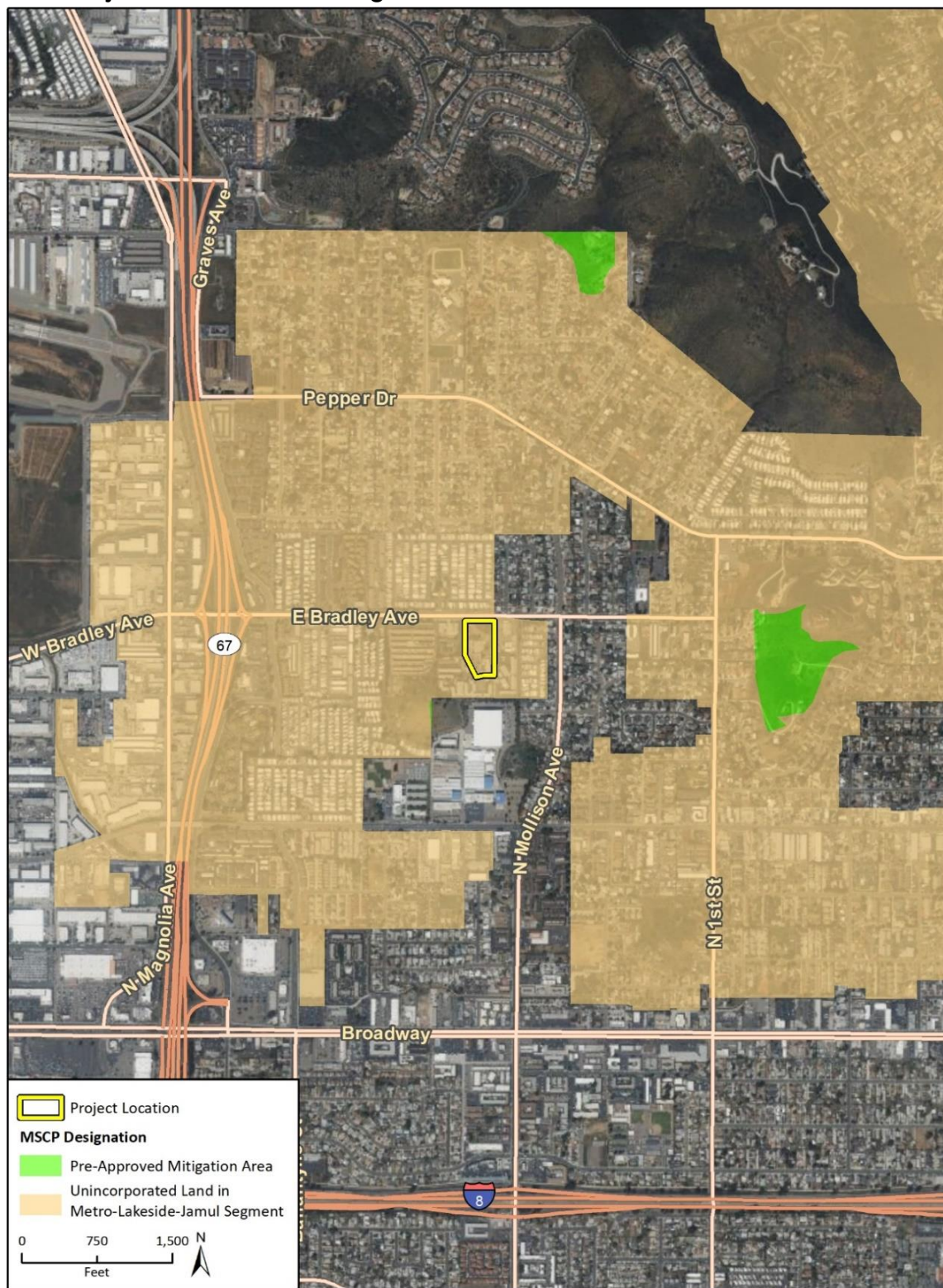
GRFig 1 Proj Locn Map



Figure 2 Project Location



Figure 3 Project Site and MSCP Designation





Environmental Statutes

For the purpose of this Letter Report, potential project-related impacts to biological resources were analyzed according to the following regulatory statutes and guiding documents:

Federal

- Federal Endangered Species Act (ESA)
- Federal Clean Water Act (CWA)
- Migratory Bird Treaty Act (MBTA)
- The Bald and Golden Eagle Protection Act

State

- CEQA
- California Endangered Species Act (CESA)
- California Fish and Game Code (CFGF)
- Porter-Cologne Water Quality Control Act

Local

- San Diego Multi-Species Conservation Program
- County of San Diego Biological Mitigation Ordinance

Database and Literature Review

Rincon conducted a review of relevant literature and a field reconnaissance survey to confirm the presence or absence of habitat for special-status species. Definitive surveys for sensitive plant and wildlife species generally require specific survey protocols, extensive field survey time, and are conducted only at certain times of the year. The findings and opinions conveyed in this report are based on this methodology.

The literature review included an evaluation of current and historical aerial photographs of the site (Google Earth 2021 and Microsoft Bing 2021), regional and site-specific topographic maps [USGS 2021], geologic maps, climatic data, and other available background information (i.e., California Department of Fish and Wildlife [CDFW], California Natural Diversity Database [CNDDDB] [CDFW 2021b], United States Fish and Wildlife Service [USFWS] Critical Habitat Portal [USFWS 2021a], National Wetlands Inventory Wetlands Mapper [USFWS 2021b] and USFWS Information for Planning and Conservation database [IPaC] [USFWS 2021c]). The literature was reviewed to determine if any special-status wildlife, plant, or vegetation communities are known or have potential to occur on site. Other resources reviewed included the California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (CNPS 2021).

Field Reconnaissance Survey

A field reconnaissance survey was conducted on November 10, 2021 by Rincon biologist Jacob Hargis. The biologist surveyed the entire site by foot; vegetation communities (and wildlife (Table 2) observed



during the survey are documented within the results. The survey includes mapping habitat and land cover within 100 feet of the site.

Results

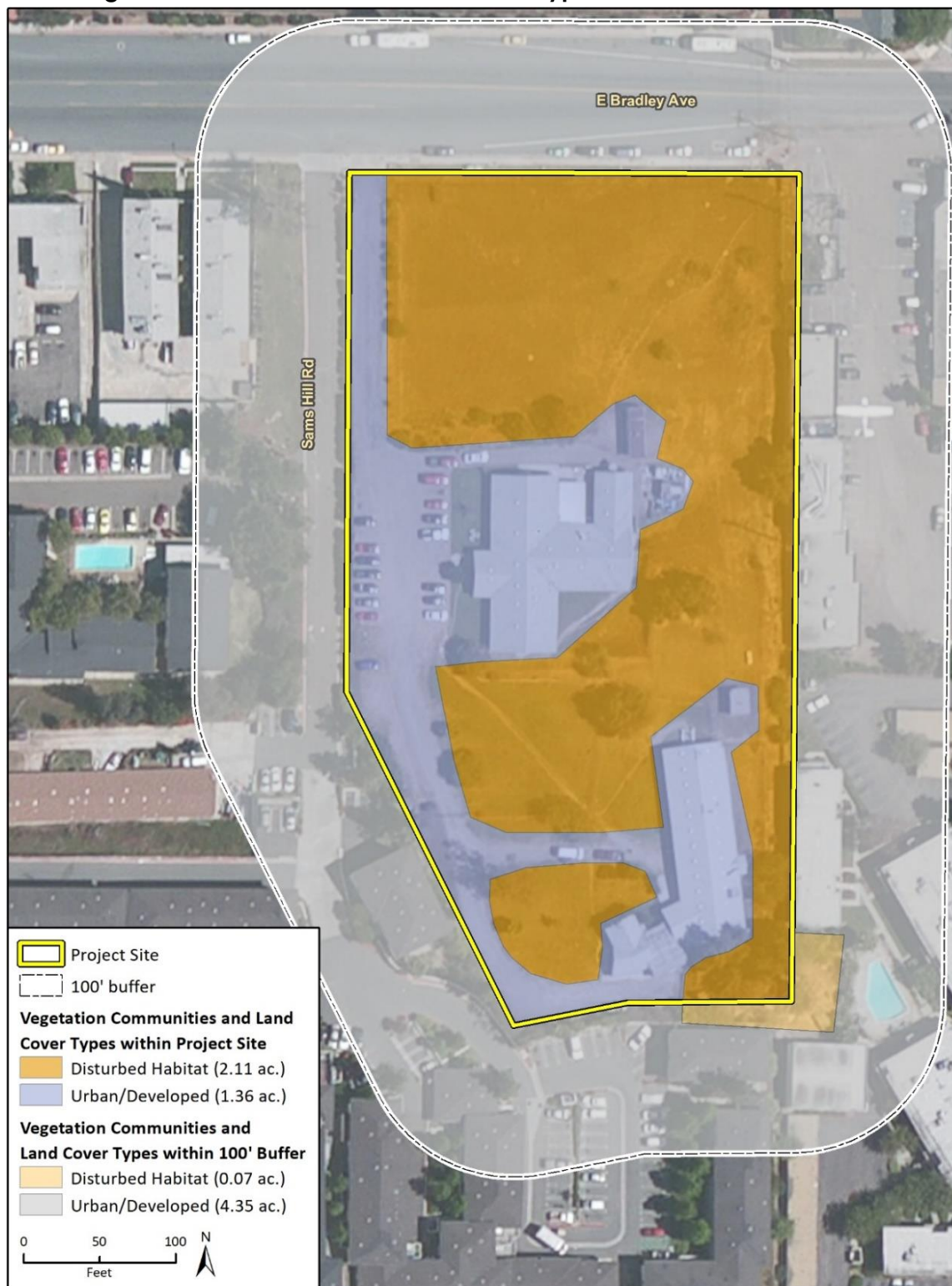
The following section provides the biological resources observed on site during the field reconnaissance survey.

Vegetation Communities and Land Cover Types

Table 1 lists the vegetation communities and land cover types observed from the field reconnaissance survey. The project site consists of urban/developed land and disturbed habitat. The reconnaissance survey identified sparsely scattered elements of Diegan coastal sage scrub species (DCSS); however, these species were not expansive or dominant enough to constitute a distinct vegetation community within the project site. Individual species such as coyote brush (*Baccharis pilularis*), mulefat (*Baccharis salicifolia*), coast live oak (*Quercus agrifolia*), wild cucumber (*Marah macrocarpa*), and coast prickly pear (*Opuntia littoralis*) were found in the along the eastern and southeast edges of the site, within disturbed habitat and bare ground, abutting urban/developed areas.

Table 1 and Figure 4) and plants

Figure 4 Vegetation Communities and Landcover Types





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The following section provides the biological resources observed on site during the field reconnaissance survey.

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Table 1 Vegetation and Land Cover Types

MSCP Tier ¹	Land Cover Type	Habitat Code ²	Acres ³
IV	Disturbed Habitat	Non-Native Vegetation (11300)	2.11
IV	Urban/Developed	Structures/Hardscape (12000)	1.36

¹ MSCP Tier levels rank habitat sensitivity, with Tier I being most sensitive and Tier IV being least sensitive.

² Vegetation categories and numerical codes are based on Holland (1986) as modified by Oberbauer et al. (2008).

³ Rounded to the nearest 0.01 acre; thus, total reflects rounding.

Disturbed Habitat

Approximately 2.11 acres of disturbed habitat occur on site. According to existing literature, disturbed habitat consists of areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate (Oberbauer et al. 2008). If vegetation is present, it is typically composed of non-native plant species such as ornamental plantings or ruderal exotic species that take advantage of disturbance or shows signs of past or present animal usage that removes any capability of providing viable natural habitat for uses other than dispersal. Examples of disturbed habitat include areas that have been graded, repeatedly cleared for fuel management purposes and/or experienced repeated use that prevents natural revegetation (i.e., dirt parking lots, trails that have been present for several decades), recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old home sites.

Characteristic species of this vegetation community/habitat type include invasive, non-native forb species, and a variety of thistles. Some disturbed habitat species from the field survey included Russian thistle (*Salsola tragus*), iceplant (*Carpobrotus edulis*), riggut brome (*Bromus diandrus*), black mustard (*Brassica nigra*), and slender wild oat (*Avena barbata*).



Urban/Developed

Urban/developed areas have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. Areas where no natural land is evident due to a large amount of debris or other materials being placed upon it may also be considered urban/developed (Oberbauer et al. 2008).

The project site contains 1.36 acres of urban/developed land cover including the special care facility, the driveway off Bradley Avenue, and the parking lot. Some of the observed ornamental vegetation during the site survey included Brazilian pepper (*Schinus terebinthifolius*), fan palm (*Washingtonia* sp.), queen palm (*Syagrus romanzoffiana*), blue jacaranda (*Jacaranda mimosifolia*), and Canary Island pine (*Pinus canariensis*).

Disturbed habitat and urban/developed land cover are classified as MSCP Tier IV habitat (considered as being the least sensitive tier) and are not considered sensitive by state or federal agencies.

Flora and Fauna

Table 2 provides a list of the floral and faunal species observed within the study area during the recent field reconnaissance survey on November 10, 2021. The project site contains habitat for wildlife species that commonly occur within urban areas, including house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), and yellow-rumped warbler (*Setophaga coronata*). Small rodent burrows were also observed along the north, east, and southeast edges/berms of the project site; mammal species were not visually observed.

Table 2 Floral and Faunal Species List

Scientific Name	Common Name	Native or Introduced
Plants		
Trees/Shrubs/Grasses		
<i>Abelia grandiflora</i>	glossy abelia	Introduced
<i>Anacardiaceae</i> sp.	cashew shrub species	Introduced
<i>Artemisia californica</i>	California sagebrush	Native
<i>Arundo donax</i>	giant cane	Introduced
<i>Avena barbata</i>	slender wild oat	Introduced
<i>Baccharis pilularis</i>	coyote brush	Native
<i>Baccharis salicifolia</i>	mulefat	Native
<i>Baccharis sarothroides</i>	desert broom	Native
<i>Bougainvillea</i> sp.	paper flower	Introduced
<i>Brassica nigra</i>	black mustard	Introduced
<i>Bromus diandrus</i>	ripgut brome	Introduced
<i>Carpobrotus edulis</i>	ice plant	Introduced
<i>Croton setiger</i>	turkey mullein (dove weed)	Native
<i>Cupressus sempervirens</i>	Mediterranean cypress	Introduced



Scientific Name	Common Name	Native or Introduced
<i>Cynodon dactylon</i>	Bermuda grass	Introduced
<i>Erodium cicutarium</i>	red stemmed filaree	Introduced
<i>Erodium malacoides</i>	Mediterranean storks-bill	Introduced
<i>Eucalyptus camaldulensis</i>	river red gum	Introduced
<i>Euphorbia maculata</i>	spotted spurge	Introduced
<i>Euryops</i> sp.	grey-leafed euryops	Introduced
<i>Ficus pumila</i>	climbing fig	Introduced
<i>Fuchsia</i> spp.	fuchsia	Introduced
<i>Gazania rigens</i>	treasure flower	Introduced
<i>Jacaranda mimosifolia</i>	blue jacaranda	Introduced
<i>Ligustrum japonicum</i>	wax-leaf ligustrum	Introduced
<i>Marah macrocarpa</i>	wild cucumber	Native
<i>Melia azedarach</i>	China berry	Introduced
<i>Opuntia ficus-indica</i>	mission prickly pear	Introduced
<i>Opuntia littoralis</i>	coast prickly pear	Native
<i>Palargonium hybridum</i>	garden geranium	Introduced
<i>Pennisetum</i> sp.	fountain grass	Introduced
<i>Phoenix canariensis</i>	Canary Island date palm	Introduced
<i>Pinus canariensis</i>	Canary Island pine	Introduced
<i>Plumbago auriculata</i>	blue plumbago	Introduced
<i>Portulaca oleracea</i>	common purslane	Introduced
<i>Pseudognaphalium microcephalum</i>	Wright's cudweed	Native
<i>Punica granatum</i>	Pomegranate	Introduced
<i>Quercus agrifolia</i>	coast live oak	Native
<i>Rhaphiolepis indica</i>	Indian hawthorn	Introduced
<i>Salsola tragus</i>	Russian thistle	Introduced
<i>Schinus terebinthifolius</i>	Brazilian pepper	Introduced
<i>Strelitzia nicolai</i>	giant bird-of-paradise	Introduced
<i>Syagrus romanzoffiana</i>	queen palm	Introduced
<i>Tribulus terrestris</i>	puncture vine	Introduced
<i>Trifolium</i> sp.	clover species	Introduced
<i>Washingtonia robusta</i>	Mexican fan palm	Introduced
Animals		
Birds		
<i>Calypte anna</i>	Anna's hummingbird	Native
<i>Corvus brachyrhynchos</i>	American crow	Native
<i>Haemorhous mexicanus</i>	house finch	Native
<i>Mimus polyglottos</i>	northern mockingbird	Native



Scientific Name	Common Name	Native or Introduced
<i>Setophaga coronata</i>	yellow-rumped warbler	Native
Reptile		
<i>Sceloporus occidentalis</i>	western fence lizard	Native

Special-Status Species

Special-Status Plant Species

The CNDDDB results include 30 special-status plant species within five miles of the project site. The IPaC results include six federally listed plant species that are recorded in the vicinity of the project site. A potential to occur analysis for the species identified by the CNDDDB and IPaC search as well as those listed in Attachment E in the County of San Diego's scoping memorandum for this project is provided in Attachment 1 of this revised report. The potential for special-status plant species to occur on the project site was assessed based on known distribution, habitat requirements, and existing site conditions during the field reconnaissance survey. No special-status plant species were observed on the project site and the field survey confirmed the absence of suitable habitat for listed special-status plant species identified within the South County Multiple Species Conservation Program's (MSCP) County Subarea Plan (County of San Diego 2006).

Special-Status Wildlife Species

The CNDDDB results include 49 special-status wildlife species within five miles of the project site. The IPaC results include six federally listed wildlife species that are recorded in the vicinity of the project site. A potential to occur analysis for the species identified by the CNDDDB and IPaC search as well as those listed in Attachment E in the County of San Diego's scoping memorandum for this project is provided in Attachment 1 of this revised report. The potential for special-status animal species to occur on the project site was assessed based on known distribution, habitat requirements, and existing site conditions. No federal or state listed, or otherwise special-status animal species were observed or are expected to occur within or near the project site due to lack of suitable habitat. Additionally, no County Group 1 and 2, and County List A, B, C, and D animal species are expected to occur within the project site (County of San Diego 2006).

Large mammals such as mule deer (*Odocoileus hemionus*) are not expected to utilize or move through the project site due to the urbanized condition of the project site.

Based on the review of the existing literature, desktop analysis, and field reconnaissance survey; no designated critical habitat for special-status wildlife species exists at the project site. Sensitive biological resources on site include the potential for nesting birds.

Nesting Birds

As previously described, the project site contains trees and other structures suitable for nesting birds that may be impacted by project construction. Under the provisions of the MBTA of 1918, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean



to “pursue, hunt, shoot, wound, kill, trap, capture or collect” any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. The CFGC extends protection to non-migratory birds identified as resident game birds (Section 3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (Section 3503).

Raptor Foraging/Nesting Habitat Evaluation

Although various locally common raptors are known to occur in the vicinity of the project area (such as red-tailed hawk [*Buteo jamaicensis*], red-shouldered hawk [*Buteo lineatus*], Cooper’s hawk [*Accipiter cooperii*], American kestrel [*Falco sparverius*], and others), these bird species are recognized as tolerant of human presence, and none are listed as Rare, Threatened, or Endangered by either the state or federal governments. No raptors would be dependent on any resources provided solely by the project site. No highly sensitive raptors, such as prairie falcons (*Falco mexicanus*) or golden eagles (*Aquila chrysaetos*), would utilize the project site, given its location, current use, small size, and proximity to existing development. For these reasons, the project site does not constitute high-value raptor foraging or nesting habitat, and the project site does not constitute a significant biological resource with respect to local raptors.

Quino Checkerspot Butterfly

The Quino checkerspot butterfly (*Euphydryas editha quino*) (Quino) is a federally endangered butterfly species native to southern California. Host plants or larval food sources for this species consist of dwarf plantain (*Plantago erecta*), white snapdragon (*Antirrhinum coulterianum*), woolly plantain (*Plantago patagonica*), and Chinese houses (*Collinsia concolor*); none of which were observed during the recent survey (USFWS 2021d). Optimal habitat for Quino is characterized by patchy shrub or small tree landscapes with openings of several meters between large plants, or a landscape of open swales alternating with dense patches of shrubs and appears to contain little or no invasive exotic vegetation (USFWS 2021d). Rincon’s biologist did not observe Quino during the field reconnaissance survey and confirmed that the project site does not contain suitable habitat or preferred host plants for this species. Therefore, Quino is not expected to occur on site.

Sensitive Habitats

Habitats are also considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. The County of San Diego considers urban/developed land cover and disturbed habitat as Tier IV Habitats (least sensitive). Urban/developed land cover and disturbed habitat are not considered vegetation communities identified as special concern by the CNDDDB or CDFW. The project site does not support riparian habitat or other sensitive natural communities identified by local or regional plans, policies, and regulations or by the CDFW or USFWS.



Jurisdictional Wetlands and Waterways

A formal jurisdictional delineation was not conducted for the project site. Based on the desktop review and field reconnaissance survey, no state or federally defined unvegetated stream(s), swale(s), riparian/riverine habitat, wetland vernal pools, or potential vernal pools occur within the project site. The closest mapped feature is a riverine intermittent stream bed that is seasonally flooded. The streambed's most southern extent is located approximately 0.48 mile north of the project site at the intersection of Pepper Drive and Rockview Drive.

Other Unique Features/Resources

Wildlife Corridors and Linkages

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. The project site is not positioned inside a conservation planning linkage zone; the closest wildlife core linkage is located 23 miles northeast of the project site (BIOS 2021). The project site is surrounded by suburban homes and commercial development; therefore, the project site does not support any wildlife corridors or linkages.

Topography/Connectivity

The project site occurs at an elevation of approximately 460 feet above mean sea level. The site topography is relatively flat. Connectivity to unique topographic features is absent due to the urbanized surrounding land uses.

Regional or Local Setting

The project site is located in a highly urbanized setting, as residential and commercial development surrounds the project site. The nearest relatively natural habitat occurs approximately 350 feet southwest of the project site. This relatively natural habitat is comprised of open space but is isolated by surrounding development.

Other Biological Functions

The project site supports limited foraging, nesting, and roosting potential for common, urban-adapted species due to the presence of ornamental trees and surrounding vegetation as well as building structures. Rock outcroppings were not present on the project site based on desktop review and field survey.

The field reconnaissance survey documented trees on the project site (Table 2). Specifically, coast live oaks occur at the southeastern extent of the project site. However, based on the project design plans from Excel Engineering dated September 19, 2022, proposed construction activities would not take place east or south of the existing building located at the southeast extent of the project site. Therefore,



the project is not expected to remove coast live oak trees. Should plans change and native trees be impacted directly or indirectly by the project, a tree protection or replacement plan is recommended.

Sensitive Soils

Sensitive soils are not expected on the project site, as native substrates have presumably been removed due to the development of the project site.

Significance of Project Impacts

The expansion of the Bradley Court Convalescent Center is subject to review under CEQA and the County's Biological Mitigation Ordinance (BMO). The County's BMO enables the County to achieve the conservation goals set forth in the Subarea Plan for the MSCP¹. The BMO sets forth the criteria for avoiding impacts to biological resource core areas and to plant and animal populations within those areas, as well as the mitigation requirements for most projects requiring a discretionary permit. Therefore, the County requires that project-related impacts to native habitat and species be "less than significant," as defined by CEQA, which requires the adoption of mitigation measures intended to reduce "significant" impacts to a level that is "less than significant."

The project site is located in the North Metro-Lakeside-Jamul Segment of the South County MSCP Subarea Plan (Figure 3). This plan does not identify the project site as being subject to habitat conservation. The proposed expansion of the existing development on the project site would therefore be in compliance with this or any other future habitat conservation plan insofar as all project impacts are mitigated to less than significant levels. Impacts to urban/developed land cover and disturbed habitat vegetation community types that occur within the project site do not have a grouping of ten or more individual plant species and do not require mitigation per the County's BMO.

The project would not have any substantial adverse effect on any candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

The project would not have any substantial adverse effect on any riparian habitat as the project site does not support any federal or state defined and regulated aquatic features wetlands. Therefore, no impacts will occur to regulated (nor non-regulated) aquatic habitat as a result of the project.

There are no wetlands associated with the project site. The project is in an urban and developed area and does not require any direct removal, filling, hydrological interruption, or other means. Therefore, implementation of the project would not have any substantial adverse effect on state or federally protected wetlands.

The project site is not positioned inside a conservation planning linkage zone, the closest wildlife core linkage is located 23 miles northeast of project site (BIOS 2021). The project site is surrounded by suburban homes and industrial developments. Due to the existing developed nature of the site the proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites.

¹ The names of the habitat types used in the Subarea Plan are consistent with the habitat types used in the MSCP or are included within or specifically identified as one of the habitat types listed in the Biological Mitigation Ordinance. The mitigation ratios included in the Subarea Plan are identical to the mitigation ratios in the Biological Mitigation Ordinance. No Mitigation Ratios are given or required for Tier IV resources.



The project site does not contain any native or sensitive vegetation communities; therefore, future development at the site is not expected to conflict with the conservation goals of the MSCP, previously defined, nor any other local, regional, or state habitat conservation plan.

Due to the developed nature of this site, the project would not cause substantial adverse effects that have not historically existed with this site. The expansion of the Bradley Convalescent Center would not create any new adverse effects to sensitive or special-status species because the project footprint lies within an existing developed site (Figure 5).

Cumulative Impacts Analysis

Pursuant to Section 15130(a) of the CEQA Guidelines, cumulative impacts must be discussed when project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. The project site is developed/highly disturbed and of little to no long-term biological value.

The proposed project would expand an existing special care facility. The proposed project is limited and encompassed by neighboring developed properties. Therefore, the proposed project is not expected to contribute significantly to cumulative impacts to the area.

The small size of this site limits project impacts from a regional perspective. Further, no native habitats are present on the site. Therefore, cumulative impacts associated with the project would be "less than significant."

Mitigation Recommendations

Nesting Bird Surveys

Common, urban-adapted birds could potentially nest within the ornamental trees and shrubs on site. Therefore, the following measure is recommended to maintain compliance with the CFGC and MBTA with respect to nesting birds:

- If initial clearing activities take place between February 15 and August 15, nesting bird surveys are recommended to be performed by a qualified biologist/ornithologist with results reported subsequently to the County prior to grading and clearing. If nesting birds are found, a County-approved construction buffer may be required until all young are determined no longer dependent on the nest.

Figure 5 Project Impacts





Limitations

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Thank you for the opportunity to assist you with this project. If you have any questions regarding this revised biological inventory report, please contact us at (760) 918-9444.

Sincerely,

Rincon Consultants, Inc.

A handwritten signature in black ink, appearing to read 'Chris Hughes'.

Christopher Hughes
Biologist IV/Marine Scientist

A handwritten signature in black ink, appearing to read 'Jared Reed'.

Jared Reed
Senior Biologist

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Steven J. Hongola
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Attachment 1

Special Status Species Evaluation Tables



Special Status Plant Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status Fed/State ESA CRPR, CDFW, MSCP Covered Species	Habitat Requirements	Potential to Occur/ Basis for Determination
<i>Acanthomintha ilicifolia</i> San Diego thorn-mint	FT/SE 1B.1 MSCP Covered Species	Annual herb. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Clay, openings. Elevations: 35-3150ft. (10-960m.) Blooms Apr-Jun.	No Potential. This species is endemic to active vertisol clay soils which are not present on site.
<i>Adolphia californica</i> California adolphia	None/None G3/S2 2B.1	Perennial deciduous shrub. Chaparral, coastal scrub, valley and foothill grassland. Clay. Elevations: 35-2430ft. (10-740m.) Blooms Dec-May.	No Potential. Suitable habitat is not present on site. This species was not observed during field reconnaissance survey.
<i>Agave shawii</i> var. <i>shawii</i>	FE/none 2B.1 MSCP Covered Species	Coastal bluff scrub. Found on coastal bluffs, historically occurred in coastal sage scrub, mesas, and foothills. Leaf succulent. 10-75m. Blooms Sept-May.	No Potential. This species occurs on coastal bluffs which are not present on site.
<i>Ambrosia pumila</i> San Diego ambrosia	FE/None 1B.1 MSCP Covered Species	Chaparral, coastal scrub, valley and foothill grassland. Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 20-415 m. perennial rhizomatous herb. Blooms Apr-Oct	No Potential. Suitable habitat (sandy areas) is not present on site. This species was not detected during the reconnaissance survey.
<i>Artemisia palmeri</i> San Diego sagewort	None/None G3?/S3? 4.2	Perennial deciduous shrub. Chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland. Mesic, sandy. Elevations: 50-3000ft. (15-915m.) Blooms (Feb)May-Sep.	No Potential. Suitable habitat is not present on site. This species was not observed during the field reconnaissance survey.
<i>Astragalus deanei</i> Dean's milk-vetch	None/None G1/S1 1B.1	Perennial herb. Chaparral, cismontane woodland, coastal scrub, riparian forest. Open, brushy south-facing slopes in Diegan coastal sage, sometimes on recently burned-over hillsides. Elevations: 245-2280ft. (75-695m.) Blooms Feb-May.	No Potential. Suitable habitat is not present on site. This species was not observed during the field reconnaissance survey.
<i>Bloomeria clevelandii</i> San Diego goldenstar	None/None G2/S3 1B.1 MSCP Covered Species	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Clay. Elevations: 165-1525ft. (50-465m.) Blooms Apr-May.	No Potential. This species occurs in openings on clay soils which are not present on site.
<i>Brodiaea filifolia</i> thread-leaved brodiaea	FT/SE 1B.1 MSCP Covered Species	Chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools. Usually associated with annual grassland and vernal pools; often surrounded by shrubland habitats. Occurs in openings on clay soils. 25-1120 m. perennial bulbiferous herb. Blooms Mar-Jun	No Potential. This species occurs in openings on clay soils which are not present on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Brodiaea orcuttii</i> Orcutt's brodiaea	None/None 1B.1 MSCP Covered Species	Vernal pools, valley and foothill grassland, closed-cone coniferous forest, cismontane woodland, chaparral, meadows and seeps. Mesic, clay habitats; usually in vernal pools and small drainages. 30-1692 m. perennial bulbiferous herb. Blooms May-Jul	No Potential. Clay soils are not present on site.
<i>Camissoniopsis lewisii</i> Lewis evening-primrose	None/None G4/S3 3	Annual herb. Cismontane woodland, coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Clay (sometimes), sandy (sometimes). Elevations: 0-985ft. (0-300m.) Blooms Mar-May(Jun).	No Potential. No suitable habitat is present on site. This species was not observed during field reconnaissance survey.
<i>Calochortus catalinae</i> Catalina mariposa Lily	None/None G3G4/S3S4 4.2	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. In heavy soils, open slopes, openings in brush. Elevations: 50-2295ft. (15-700m.) Blooms (Feb)Mar-Jun.	No Potential. This species associated habitat and soils are not present within the site.
<i>Ceanothus cyaneus</i> Lakeside ceanothus	None/None G2/S2 1B.2 MSCP Covered Species	Closed-cone coniferous forest, chaparral. 200-1040 m. perennial evergreen shrub. Blooms Apr-Jun	No Potential. This species occurs in forests and chaparral at higher elevations than are found on site.
<i>Ceanothus verrucosus</i> wart-stemmed ceanothus	None/None G2/S2? 2B.2 MSCP Covered Species	Chaparral. 25-470 m. perennial evergreen shrub. Blooms Dec-May	No Potential. This species occurs in forests and chaparral at higher elevations than are found on site.
<i>Centromadia pungens</i> <i>ssp. laevis</i> smooth tarplant	None/None G3G4T2/S2 1B.1 MSCP Covered Species	Annual herb. Chenopod scrub, meadows and seeps, playas, riparian woodland, valley and foothill grassland. Alkaline. Elevations: 0-2100ft. (0-640m.) Blooms Apr-Sep.	No Potential. Suitable habitat and soils for this species is not present on site.
<i>Clarkia delicata</i> delicate clarkia	None/None G3/S3 1B.2	Cismontane woodland, chaparral. Often on gabbro soils. Elevations: 770-3280ft. (235-1000m.) annual herb. Blooms Apr-Jun	No Potential. This species occurs in cismontane woodlands and chaparral, which do not occur on site.
<i>Convolvulus simulans</i> small-flowered morning glory	None/None G4/S4 4.2	Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Clay, seeps, serpentinite. Elevations: 100-2430ft. (30-740m.) Blooms Mar-Jul.	No Potential. This species requires clay soils, seeps, and intact chaparral, coastal scrub, and grassland which are not present on site.
<i>Cylindropuntia californica</i> var. <i>californica</i> snake cholla	None/None G3T2/S1 1B.1 MSCP Covered Species	Chaparral, coastal scrub. 15-290 m. perennial stem succulent. Blooms Apr-May	No Potential. Suitable habitat is not present on site. This species was not observed during field reconnaissance survey.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

Scientific Name Common Name	Status Fed/State ESA CRPR, CDFW, MSCP Covered	Habitat Requirements	Potential to Occur/ Basis for Determination
<i>Dudleya variegata</i> variegated dudleya	None/None G2/S2 1B.2 MSCP Covered Species	Chaparral, coastal scrub, cismontane woodland, valley and foothill grassland. In rocky or clay soils; sometimes associated with vernal pool margins. 3-550 m. perennial herb. Blooms Apr-Jun	No Potential. Suitable habitat is not present on site. This species was not observed during field reconnaissance survey.
<i>Ericameria palmeri</i> var. <i>palmeri</i> Palmer's goldenbush	None/None G4T2?/S2 1B.1 MSCP Covered Species	Coastal scrub, chaparral. On granitic soils, on steep hillsides. Mesic sites. 5-625 m. perennial evergreen shrub. Blooms (Jul)Sep-Nov	No Potential. Suitable habitat is not present on site. This species was not observed during field reconnaissance survey.
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	Fe/SCE G4T1/S1 1B.1 MSCP Covered Species	Annual/perennial herb. Coastal scrub, valley and foothill grassland, vernal pools. San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. Elevations: 65-2035ft. (20-620m.) Blooms Apr-Jun.	No Potential. This species occurs in vernal pools which are not present on site
<i>Ferocactus viridescens</i> San Diego barrel cactus	None/None G3?/S2S3 2B.1 MSCP Covered Species	Chaparral, coastal scrub, valley and foothill grassland. Often on exposed, level or south-sloping areas; often in coastal scrub near crest of slopes. 3-490 m. perennial stem succulent. Blooms May-Jun	No Potential. Suitable habitat is not present on site. This species was not observed during field reconnaissance survey.
<i>Grindelia hallii</i> San Diego gumplant	None/None G2/S2 1B.2	Perennial herb. Chaparral, lower montane coniferous forest, meadows and seeps, valley and foothill grassland. Frequently occurs in low moist areas in meadows. Associated species commonly include <i>Wyethia</i> , <i>Ranunculus</i> , <i>Sidalcea</i> . Elevations: 605-5725ft. (185-1745m.) Blooms May-Oct.	No Potential. The site does not occur in the species elevation range.
<i>Harpagonella palmeri</i> Palmer's grapplinghook	None/None G4/S3 4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within shrubland. 20-955 m. annual herb. Blooms Mar-May	No Potential. Suitable habitat and preferred soils for this species are not present on site.
<i>Holocarpha virgata</i> ssp. <i>Elongate</i> graceful tarplant	None/none 4.2 MSCP Covered Species	Annual herb; chaparral, valley grassland, foothill woodland, coastal sage scrub; blooms May-Nov; elevation 200-350 feet.	No Potential. The species' associated habitat is not present on site
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	None/None G3G5T2T3/S2 1B.2	Coastal scrub, chaparral. Sandy soils; often in disturbed sites. 1-915 m. perennial shrub. Blooms Apr-Nov	No Potential. Suitable habitat is not present on site. This species was not observed during any field surveys.
<i>Iva hayesiana</i> San Diego marsh-elder	None/None G3/S2 2B.2	Marshes and swamps, playas. Riverwashes. 1-430 m. perennial herb. Blooms Apr-Oct	No Potential. This species occurs in wetlands and suitable wetland habitat is not found on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Lepidium virginicum</i> var. <i>robinsonii</i> Robinson's pepper- grass	None/None 1B MSCP Covered Species	Annual herb; coastal sage scrub, chaparral. 0- 158 m. Blooms Jan–Jul	No Potential. The species associated habitat is absent on site
<i>Microseris douglasii</i> ssp. <i>platycarpa</i> small-flowered microseris	None/None G4T4/S4 4.2	Cismontane woodland, valley and foothill grassland, coastal scrub, vernal pools. Alkaline clay in river bottoms. 15-1070 m. annual herb. Blooms Mar-May	No Potential. The species' associated habitat and soils are not present on site.
<i>Monardella viminea</i> willoway monardella	Endangered/ Endangered G1/S1 1B.1 MSCP Covered Species	Coastal scrub, chaparral, riparian forest, riparian scrub, riparian woodland. In canyons, in rocky and sandy places, sometimes in washes or floodplains; with <i>Baccharis</i> , <i>Iva</i> , etc. Alluvial, ephemeral washes with adjacent coastal scrub. 45-230 m. perennial herb. Blooms Jun-Aug	No Potential. The species' associated habitat is not present on site.
<i>Myosurus minimus</i> ssp. <i>apus</i> little mouseltail	None/None 3.1 MSCP Covered Species	Annual herb. Found in valley and foothill grassland, vernal pools. 20-640 m. Blooms Mar- Jun	No Potential. This species occurs in vernal pools which are not present on site.
<i>Nolina interrata</i> Dehesa nolina	None/SCE G2/S2 1B.1 MSCP Covered Species	Perennial herb. Chaparral. Typically, on rocky hillsides or ravines on ultramafic soils (gabbro, serpentine, or metavolcanic). Elevations: 605- 2805ft. (185-855m.) Blooms Jun-Jul	No Potential. The species' associated habitat is not present on site.
<i>Pogogyne abramsii</i> San Diego mesa mint	Endangered/ Endangered G1/S1 1B.1 MSCP Covered Species	Vernal pools within grasslands, chamise chaparral, or coastal sage scrub communities. 70-195 m. annual herb. Blooms Mar-Jul	No Potential. This species occurs in vernal pools which are not present on site.
<i>Pseudognaphalium</i> <i>leucocephalum</i> white rabbit-tobacco	None/None G4/S2 2B.2	Perennial herb. Chaparral, cismontane woodland, coastal scrub, riparian woodland. Sandy, gravelly sites. Elevations: 0-6890ft. (0- 2100m.) Blooms (Jul)Aug-Nov(Dec).	No Potential. The species' associated habitat is not present on site.
<i>Senecio aphanactis</i> chapparal ragwort	None/None G3/S2 2B.2	Annual herb. Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. Elevations: 50-2625ft. (15-800m.) Blooms Jan-Apr (May).	No Potential. This species associated habitat and soils are not present on site.
<i>Texosporium sancti- jacobi</i> woven-spored lichen	None/None G3/S2 3	Crustose lichen (terricolous). Chaparral. Open sites; in California with chamise (<i>Adenostoma fasciculatum</i>), buckwheat (<i>Eriogonum</i> spp.), Selaginella (spikemoss spp.). Found on soil, small mammal pellets, dead twigs, and on Selaginella. Elevations: 195-2165ft. (60-660m.)	No Potential. The site does not occur in the species elevation range.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
Convalescent Center Expansion Project**

Scientific Name Common Name	Status Fed/State ESA CRPR, CDFW, MSCP Covered	Habitat Requirements	Potential to Occur/ Basis for Determination
<i>Quercus dumosa</i> Nuttall's scrub oak	None/None G3/S3 1B.1	Closed-cone coniferous forest, chaparral, coastal scrub. Generally, on sandy soils near the coast; sometimes on clay loam. 15-640 m. perennial evergreen shrub. Blooms Feb-Apr (May-Aug)	No Potential. This species occurs in woodlands which are not found on site.

Regional Vicinity refers to within a 5-mile search radius of site.

Status (Federal/State)

FE = Federal Endangered

FT = Federal Threatened

FPE = Federal Proposed Endangered

FPT = Federal Proposed Threatened

FD = Federal Delisted

FC = Federal Candidate

SE = State Endangered

ST = State Threatened

SCE = State Candidate Endangered

SCT = State Candidate Threatened

SR = State Rare

SD = State Delisted

SSC = CDFW Species of Special Concern

FP = CDFW Fully Protected

WL = CDFW Watch List

CRPR (CNPS California Rare Plant Rank)

1A = Presumed extirpated in California, and rare or extinct elsewhere

1B = Rare, Threatened, or Endangered in California and elsewhere

2A = Presumed extirpated in California, but common elsewhere

2B = Rare, Threatened, or Endangered in California, but more common elsewhere

3 = Need more information (Review List)

4 = Limited Distribution (Watch List)

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)

.3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

Other Statuses

G1 or S1 Critically Imperiled Globally or Subnationally (state)

G2 or S2 Imperiled Globally or Subnationally (state)

G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state)

G4/5 or S4/5 Apparently secure, common and abundant

GH or SH Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery

Additional notations may be provided as follows

T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)

Q – Questionable taxonomy that may reduce conservation priority

? – Inexact numeric rank



Special Status Wildlife Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements	Potential to Occur/ Basis for Determination
Invertebrates			
<i>Bombus crotchii</i> Crotch bumble bee	None/None G2/S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	No Potential. The species' associated foraging and pollinator habitat is not present on site.
<i>Branchinecta sandiegonensis</i> San Diego fairy shrimp	FE/None MSCP Covered Species	Endemic to San Diego and Orange County mesas. Vernal pools.	No Potential. Vernal pools are not present on site.
<i>Callophrys thornei</i> Thorne's hairstreak	None/None G3G4T2/S2	Associated with the endemic tecate cypress (<i>Cupressus forbesii</i>). Only known from vicinity of Otay Mountain.	No Potential. Tecate cypress trees are not present on site.
<i>Danaus plexippus</i> pop. 1 monarch - California overwintering population	None/None G4T2T3/S2S3	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Low Potential. This species could be present during seasonal migration due to the ornamental flowering vegetation on site.
<i>Euphydryas editha quino</i> (= <i>E. e. wrighti</i>) Quino checkerspot butterfly	FE/None G5T1T2/S1S2	Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties. Hills and mesas near the coast. Need high densities of food plants dwarf plantain (<i>Plantago erecta</i>), ovate plantain (<i>P. ovata</i> var. <i>insularis</i>), and purple owl's clover (<i>Castilleja exserta</i> ssp. <i>exserta</i>).	No Potential. The species requires high densities of flood plants such as dwarf plantain, ovate plantain, and purple owl's clover which are not present on site.
<i>Lycaena Hermes</i> Hermes copper butterfly	FT/None G1/S1	Found in southern mixed chaparral and coastal sage scrub at western edge of Laguna Mountains. Host plant is Rhamnus crocea. Although R. crocea is widespread throughout the coast range, Lycaena hermes is not.	No Potential. This species known populations occur on the western edge of the Laguna Mountains. The preferred host plant and geographical conditions are not present on site.
Reptiles			
<i>Anniella stebbinsi</i> Southern California (San Diego) legless lizard	None/None G3/S3 SSC	Generally, south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally, in moist, loose soil. They prefer soils with a high moisture content.	No Potential. The species requires sandy or loose loamy soils which are not present on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Arizona elegans occidentalis</i> California glossy snake	None/None G5T2/S2 SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	No Potential. The species requires scrub and grassland habitat and sandy or loose loamy soils which are not present on site.
<i>Aspidoscelis hyperythra</i> orange-throated whiptail	None/None SSC MSCP Covered Species	Intact coastal sage scrub, California buckwheat dominant, sage (<i>Salvia</i> spp.), Yucca, Opuntia, and sagebrush (<i>Artemisia</i> spp.) present.	No Potential. The species' associated habitat is not present on site.
<i>Aspidoscelis tigris stejnegeri</i> San Diegan tiger whiptail	None/None SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	No Potential. The site lacks suitable habitat despite the open/disturbed habitat is present and small mammal burrows. This species was not observed during the field reconnaissance survey.
<i>Coleonyx variegatus abbotti</i> San Diego banded gecko	None/None G5T5/S1S2 SSC	Coastal and cismontane Southern California. Found in granite or rocky outcrops in coastal scrub and chaparral habitats.	No Potential. The species' associated habitat is not present on site.
<i>Crotalus ruber</i> red-diamond rattlesnake	None/None G4/S3 SSC	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	No Potential. The species' associated habitat is not present on site.
<i>Plestiodon skiltonianus interparietalis</i> Coronado skink	None/None G5T5/S2S3 WL	Grassland, chaparral, pinon-juniper and juniper sage woodland, pine (<i>Pinus</i> sp.) - oak (<i>Quercus</i> sp.) and pine forests in Coast Ranges of southern California. Prefers early successional stages or open areas. Found in rocky areas close to streams and on dry hillsides.	No Potential. Grassland, chaparral, pinon-juniper and juniper sage woodland, pine-oak and pine forests habitat is not present on site.
<i>Phrynosoma blainvillii</i> coast horned lizard	None/None G3G4/S3S4 SSC MSCP Covered Species	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	No Potential. The site lacks sandy washes and low bush cover. The open/disturbed habitat is low quality and impacted by human disturbance.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Salvadora hexalepis virgultea</i> coast patch-nosed snake	None/None G5T4/S2S3 SSC	Brushy or shrubby vegetation in coastal Southern California. Require small mammal burrows for refuge and overwintering sites.	No Potential. The species' associated habitat is not present on site. The site lacks brushy or shrubby vegetation.
<i>Thamnophis hammondi</i> two-striped gartersnake	None/None G4/S3S4 SSC	Generally found near water sources - pools, creeks, cattle tanks, and others, often in rocky areas. Associated vegetation: oak woodland, willow (<i>Salix</i> sp.), coastal sage scrub, scrub oak (<i>Quercus berberidifolia</i>), sparse pine, chaparral, and brushland.	No Potential. No drainages or other suitable habitat are present on site.
Amphibians			
<i>Spea hammondi</i> western spadefoot	None/None G2G3/S3 SSC	Road rut pools, vernal pools, alluvial fans, and streams in grassland habitats and valley-foothill hardwood woodlands.	No Potential. The species' associated habitat is not present on site.
<i>Anaxyrus californicus</i> arroyo toad	FE/None G2G3/S2S3 SSC MSCP Covered Species	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc.	No Potential. The species requires washes or intermittent streams, desert terrain habitats, which are not present on site.
Birds			
<i>Accipiter cooperii</i> Cooper's hawk	None/None G4/S4 WL MSCP Covered Species	Coastal lowland, marshes, grassland, agricultural fields.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Agelaius tricolor</i> tricolored blackbird	None/ST G1G2/S1S2 SSC MSCP Covered Species	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	None/None G5T3/S3 WL MSCP Covered Species	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Ammodramus savannarum</i> grasshopper sparrow	None/None G5/S3 SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	No Potential. The species' associated nesting and foraging habitat is not present on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Ardea herodias</i> great blue heron	None/None G5/S3 MSCP Covered Species	Colonial nester in tall trees, cliffsides, and sequestered spots on marshes.	No Potential. This species requires close proximity to waters or marshlands which are not in the vicinity of the site.
<i>Artemisiospiza belli belli</i> Bell's sage sparrow	None/None G5T2T3/S3 WL	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yds apart.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Athene cunicularia hypugaea</i> western burrowing owl	None/None G4/S3 SSC MSCP Covered Species	Grassland, agricultural land, coastal dunes. Require rodent and small mammal burrows.	No Potential. The species' associated nesting and foraging habitat is not present on site. Small mammal burrows observed were less than 4" in diameter and are not suitable for this species.
<i>Aquila chrysaetos</i> golden eagle	None/FP WL G5/S3 MSCP Covered Species	Rolling foothills, mountain areas, sage-juniper flats, and desert.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Buteo swainsoni</i> Swainson's hawk	None/ST G5/S3 MSCP Covered Species	Plains, range, open hills, sparse trees, including cottonwoods (<i>Populus</i> spp.) for nesting. Uncommon spring migrant. Local breeding population now extirpated.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Campylorhynchus brunneicapillus sandiegensis</i> coastal cactus wren	None/None G5T3Q/S3 SSC MSCP Covered Species	Southern California coastal sage scrub. Wrens require tall opuntia cactus for nesting and roosting.	No Potential. This species requires dense contiguous stands of opuntia cactus which or not present on site.
<i>Cathartes aura</i> turkey vulture	None/None	Plains, fields, roads, all open habitats. Soaring species that utilizes extensive open areas with protected nest sites such as rock outcroppings, trees, riparian thickets, and shrubs.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Circus hudsonius</i> northern harrier	None/None G5/S3 MSCP Covered Species	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas.	No Potential. The species' associated nesting and foraging habitat is not present on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Elanus leucurus</i> white-tailed kite	None/None G4/S3S4 FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Empidonax traillii extimus</i> southwestern willow flycatcher	FE/SE G5T2/S1 MSCP Covered Species	Riparian woodlands in Southern California.	No Potential. This species requires riparian woodland habitat which is not present on site.
<i>Coturnicops noveboracensis</i> yellow rail	None/None G4/S1S2 SSC	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.	No Potential. This species requires freshwater marshlands which are not present on site. This species is presumed extant from San Diego County.
<i>Eremophila alpestris actia</i> California horned lark	None/None G5T4Q/S4 WL	Coastal regions, chiefly from Sonoma County to San Diego County. Prefers short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Falco columbarius</i> merlin (wintering)	None/None G5/S3S4 WL	Seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands and deserts, farms and ranches.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Falco mexicanus</i> prairie falcon	None/None G5/S4 WL	Inhabits dry, open terrain, either level or hilly. Breeding sites located on cliffs. Forages far afield, even to marshlands and ocean shores.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Gymnogyps californianus</i> California condor	FE/SE G1/S1 FP	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Lanius ludovicianus</i> loggerhead shrike	None/None G4/S4 SSC	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes.	No Potential. The species' associated nesting and foraging habitat is not present on site.
<i>Larus californicus</i> California gull (non- breeding)	None/None G5/S4 WL MSCP Covered Species	Littoral waters, sandy beaches, waters and shorelines of bays, tidal mud-flats, marshes, lakes, etc.	No Potential. The species' associated nesting and foraging habitat is not present on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Ixobrychus exilis</i> least bittern	None/None G4G5/S2 SSC	Colonial nester in marshlands and borders of ponds and reservoirs which provide ample cover. Nests usually placed low in tules, over water.	No Potential. This species requires water for cover, foraging, and nesting which is not present on site.
<i>Polioptila californica</i> <i>califórnic</i> coastal California gnatcatcher	FT/None G4G5T3Q/S2 SSC MSCP Covered Species	Obligate, permanent resident of coastal sage scrub below 2500 ft in southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	No Potential. The site does not contain suitable coastal sage scrub that would provide foraging and nesting for this species.
<i>Vireo bellii pusillus</i> least Bell's vireo	FE/SE G5T2/S2 MSCP Covered Species	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis (<i>Baccharis</i> sp.), mesquite (<i>Prosopis</i> sp.).	No Potential. This species requires riparian habitat which is not present on site.
Mammals			
<i>Antrozous pallidus</i> pallid bat	None/None G4/S3 SSC MSCP Covered Species	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas, cliffs, and crevices for roosting.	No Potential. The species' associated roosting habitat is not present on site.
<i>Chaetodipus californicus</i> <i>femoralis</i> Dulzura pocket mouse	None/None G5T3/S3 SSC	Variety of habitats including coastal scrub, chaparral and grassland in San Diego County. Attracted to grass-chaparral edges.	No Potential. Suitable habitat for this species consisting of coastal scrub, chaparral, and grasslands are not present on site.
<i>Chaetodipus fallax</i> northwestern San Diego pocket mouse	None/None G5T3T4/S3S4 SSC	Found in chaparral, grasslands, scrub forests, and deserts. Major habitat requirement is the presence of low growing vegetation or rocky outcroppings, as well as sandy soil in which they dig burrows.	No Potential. One isolated rocky outcropping was observed in the southeast corner of the site. Small mammal burrows were present; however, this area is isolated, surrounded by commercial development, housing, and a wire fence. Due the isolated area, surrounding disturbances, and lack of suitable associated micro and macro habitats for this species, it is not expected to occur on site.



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
 Convalescent Center Expansion Project**

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<i>Choeronycteris mexicana</i> Mexican long-tongued bat	None/None G4/S1 SSC	Occasionally found in San Diego County, which is on the periphery of their range. Feeds on nectar and pollen of night-blooming succulents. Roosts in relatively well-lit caves, and in and around buildings.	No Potential. This species requires well-lit caves or buildings for roosting, which are not present on site.
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None/None G4/S2 SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings of caves and abandoned buildings. Roosting sites limiting. Extremely sensitive to human disturbance.	No Potential. The species' associated roosting habitat is not present on site.
<i>Eumops perotis californicus</i> western mastiff bat	None/None G4G5T4/S3S4 SSC	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral. Roosts in crevices in trees, tunnels, cliffs, and high buildings.	No Potential. The species' associated roosting habitat is not present on site.
<i>Lasiurus xanthinus</i> western yellow bat	None/None G4G5/S3 SSC	Roosts in trees, primarily palms. Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.	No Potential. One palm tree was observed in the graveled parking lot on site, however this tree lacked dead fronds and appeared to be subject to trimming activities.
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	None/None SSC MSCP Covered Species	Intermediate canopy stages of shrub habitats and open shrub/herbaceous and tree/herbaceous edges. Coastal sage scrub habitats in Southern California.	No Potential. Suitable coastal sage scrub habitat is not present on site.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None/None G5T3T4/S3S4 SSC	Coastal scrub of Southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs, and slopes.	No Potential. Suitable habitat is not present on site due to the high levels of disturbance and lack of habitat connectivity.
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	None/None G5/S3 SSC MSCP Covered Species	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	No Potential. This species occurs in rocky areas with high cliffs which are not found on site.
<i>Nyctinomops macrotis</i> big free-tailed bat	None/None G5/S3 SSC MSCP Covered Species	Low-lying arid areas in southern California. Need high cliffs or rocky outcrops for roosting sites.	No Potential. The species' associated roosting habitat is not present on site.
<i>Odocoileus hemionus</i> southern mule deer	None/None MSCP Covered Species	Riparian and oak woodlands, chaparral, sage scrub, dense thickets with water sources nearby.	No Potential. This species requires a mosaic of vegetation and contiguous habitat to forage and bed. The site



ARCO Construction Company, Inc.
**Revised Biological Resource Letter Report for the Bradley Court
Convalescent Center Expansion Project**

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			is located in an urbanized setting with no habitat connectivity that would be required for this species.
<i>Taxidea taxus</i> American badger	None/None G5/S3 SSC MSCP Covered Species	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	No Potential. No diagnostic sign of the species (e.g., burrows or digs) were identified during field reconnaissance survey.

Regional Vicinity refers to within a 5-mile search radius of site.

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
FPE = Federal Proposed Endangered
FPT = Federal Proposed Threatened
FD = Federal Delisted
FC = Federal Candidate
SE = State Endangered
ST = State Threatened
SCE = State Candidate Endangered
SCT = State Candidate Threatened
SR = State Rare
SD = State Delisted
SSC = CDFW Species of Special Concern
FP = CDFW Fully Protected
WL = CDFW Watch List

CRPR (CNPS California Rare Plant Rank)

1A = Presumed extirpated in California, and rare or extinct elsewhere
1B = Rare, Threatened, or Endangered in California and elsewhere
2A = Presumed extirpated in California, but common elsewhere
2B = Rare, Threatened, or Endangered in California, but more common elsewhere
3 = Need more information (Review List)
4 = Limited Distribution (Watch List)

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
.3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

Other Statuses

G1 or S1 Critically Imperiled Globally or Subnationally (state)
G2 or S2 Imperiled Globally or Subnationally (state)
G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state)
G4/5 or S4/5 Apparently secure, common and abundant
GH or SH Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery

Additional notations may be provided as follows

T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
Q – Questionable taxonomy that may reduce conservation priority
? – Inexact numeric rank