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An Employee-Owned Company

July 20, 2021

Mr. Scott Murray
Greenlaw Partners
18301 Von Karman Avenue, Suite 250
Irvine, CA 92612

Reference: Biological Resources Letter Report for the Sweetwater Springs Triangular Parking Lot Project (Project Number PDS2021-STP-21-019; RECON Number 9931)

Dear Mr. Murray:

This report summarizes the biological resources survey and results, assessment for potential impacts on biological resources, and proposed mitigation for the Sweetwater Springs Triangular Parking Lot Project (project).

- Project Common Name: Sweetwater Springs Triangular Parking Lot Project
- Project Number: PDS2021-STP-21-019
- Date: July 14, 2021
- County-approved Preparer:
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- Project Proponent: Mr. Scott Murray
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- Prepared for the County of San Diego (County)

Summary

The subject property is a triangular shaped parcel located behind the industrial building located at 2500 Sweetwater Springs Boulevard, Spring Valley, California. Zoned M58, it consists of approximately 2 acres of vacant land. The property requires grading and surfacing of the lot for the proposed "automotive and equipment: fleet storage" use for the parking of approximately 69 delivery vans. No structures will be constructed, and no building signage will be required. In the spring of 2021, the site was cleared for fuel modification and to address fire hazard and other safety concerns from a homeless encampment on-site. The site is surrounded by commercial and residential development to the north, west, and south. The eastern boundary of the site is coincident with the boundary of an open space preserve, the San Diego National Wildlife Refuge. The site is located within the Metro-Lakeside Jamul Segment of the South County Multiple Species Conservation Program (MSCP) Subarea Plan. The site does not meet the criteria for Biological Resource Core Area (BRCA).

Two sensitive vegetation communities—Diegan coastal sage scrub (including disturbed form) and non-native grassland—were identified within the survey area. Eucalyptus woodland, disturbed land, and urban/developed land were also mapped.

Only one special status plant species was observed within the survey area, ashy spike-moss (*Selaginella cinerascens*). In addition, three other special status plant species, Otay tarplant (*Deinandra conjugens*), San Diego barrel cactus (*Ferocactus viridescens*), and California adolphia (*Adolphia californica*) have a moderate potential to occur. Critical habitat for Otay tarplant is located directly to the east on the adjacent open space preserve.

No special status wildlife species were observed. Nine special status wildlife species—Crotch's bumble bee (*Bombus crotchii*), Quino checkerspot butterfly (*Euphydryas editha quino*), Blainville's horned lizard (*Phrynosoma blainvillii*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Cooper's hawk (*Accipiter cooperi*), coastal California gnatchatcher (*Polioptila californica californica*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)—have a moderate potential to occur within the survey area. Critical habitat for coastal California gnatcatcher is located directly to the east on the adjacent open space preserve.

The parking lot will be constructed in the center of the site. Given the small size and triangular shape of the lot, and the recent clearing for fuel modification and safety considerations, impacts to the entire site were analyzed, for a total of 2.05 acres of permanent impact. Impacts to sensitive vegetation communities comprise 1.41 acres of Diegan coastal sage scrub, including the disturbed form (MSCP Tier II) and 0.52 acre of non-native grassland (MSCP Tier III). A total of 0.11 acre of two additional vegetation communities/land cover types that are not considered sensitive are proposed to be permanently impacted by the project: eucalyptus woodland and urban/developed land.

Permanent impacts to sensitive vegetation communities would be mitigated off-site in the form of purchase of credits from a County-approved mitigation area. Mitigation for impacts to sensitive vegetation communities would occur at a ratio of 1:1 for permanent impacts to Diegan coastal sage scrub and 0.5:1 for permanent impacts to non-native grassland. Impacts to vegetation communities/land cover types that are not considered sensitive would not require mitigation.

Impacts to special status plant species would be avoided or mitigated to a level of less than significant. To avoid impacts to Otay tarplant, San Diego barrel cactus, California adolphia, and ashy spike-moss, a pre-construction survey will be conducted to determine whether any plants have regrown within the project footprint. If the survey is negative, no additional measures are required. If any of these species are detected, additional consultation with County staff will be required to determine any additional mitigation measures required. In-kind preservation at a mitigation ratio of 1:1 to 3:1 would be required per the County Biological Mitigation Ordinance (BMO) for Otay tarplant, San Diego barrel cactus, and California adolphia. Habitat-based mitigation proposed for impacts to sensitive vegetation will serve as mitigation for any impacts to ashy spike-moss, a County List D species.

Impacts to special status wildlife species would be avoided or mitigated to a level of less than significant. Habitat-based mitigation will serve to mitigate for potential direct impacts to non-avian species, including Crotch's bumble bee, Blainville's horned lizard, Belding's orange-throated whiptail, San Diegan tiger whiptail, and San Diego black-tailed jackrabbit. Mitigation for impacts to avian and raptor species and the Quino checkerspot butterfly are as follows:

- To avoid impacting special status avian and raptor species, including southern California rufous-crowned sparrow and Cooper's hawk, grading, brush clearing, and all other construction activities within or adjacent to suitable nesting habitat would be conducted outside the combined avian and raptor breeding season, which occurs between January 15 and September 15, if feasible. If avoidance of the combined avian and

raptor breeding season is not feasible, pre-construction surveys would be required to identify nesting birds and measures developed to avoid active nests, in consultation with the County and Wildlife Agencies.

- If construction activities must take place during the coastal California gnatcatcher breeding season (March 1 to August 15), a pre-construction survey will be conducted to determine if the species is present within the project site or the adjacent 500-feet from the project. If coastal California gnatcatcher is present, an acoustician shall work with the County to implement noise attenuation devices (e.g., noise walls), noise monitoring, and/or other methods to reduce noise levels at the edge of occupied habitat to coastal California gnatcatcher to a level of less than significant.

- To avoid impacts to Quino checkerspot butterfly, a pre-construction survey will be conducted to determine whether any host plants have regrown within the project footprint. If the survey is negative, no additional measures are required. If any host plants are detected, additional measures, such as a focused survey for the butterfly may be required. This would need to be determined through consultation with County and wildlife agency staff.

With the proposed avoidance, minimization, and mitigation measures described above, this project is not anticipated to significantly conflict with any local policies or ordinances protecting biological resources or 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 not result in any impact to federal or other jurisdictional wetlands/waterways, wildlife movement corridors, or wildlife nursery sites.

The impact analysis and recommended mitigation measures in this document reflect both the County Guidelines for Determining Significance and the Multiple Species Conservation Program South County Subarea Plan (County of San Diego 1997). Additional guidance was obtained from the County's Report Format and Content Requirements (2010a) and the County BMO (County of San Diego 2010c).

1.0 Introduction, Project Description, Location, and Setting

1.1 Project Location

The subject property is a triangular shaped parcel located behind the industrial building located at 2500 Sweetwater Springs Boulevard, Spring Valley, California (Figure 1). The site is located southeast of the intersection of Sweetwater Springs Boulevard and Jamacha Boulevard (Figure 2). The site consists of approximately 2 acres of vacant land just northeast of a commercial property, south of a residential mobile home community, and east of a large open space preserve to the east (Figure 3). The Assessor's Parcel Number for this project is 505-231-03-00.

1.2 Project Description

The site is zoned M58 (High Impact Industrial) and requires grading and surfacing of the lot for the "proposed automotive and equipment: fleet storage" use for the parking of approximately 69 delivery vans. No structures will be constructed, and no building signage will be required.

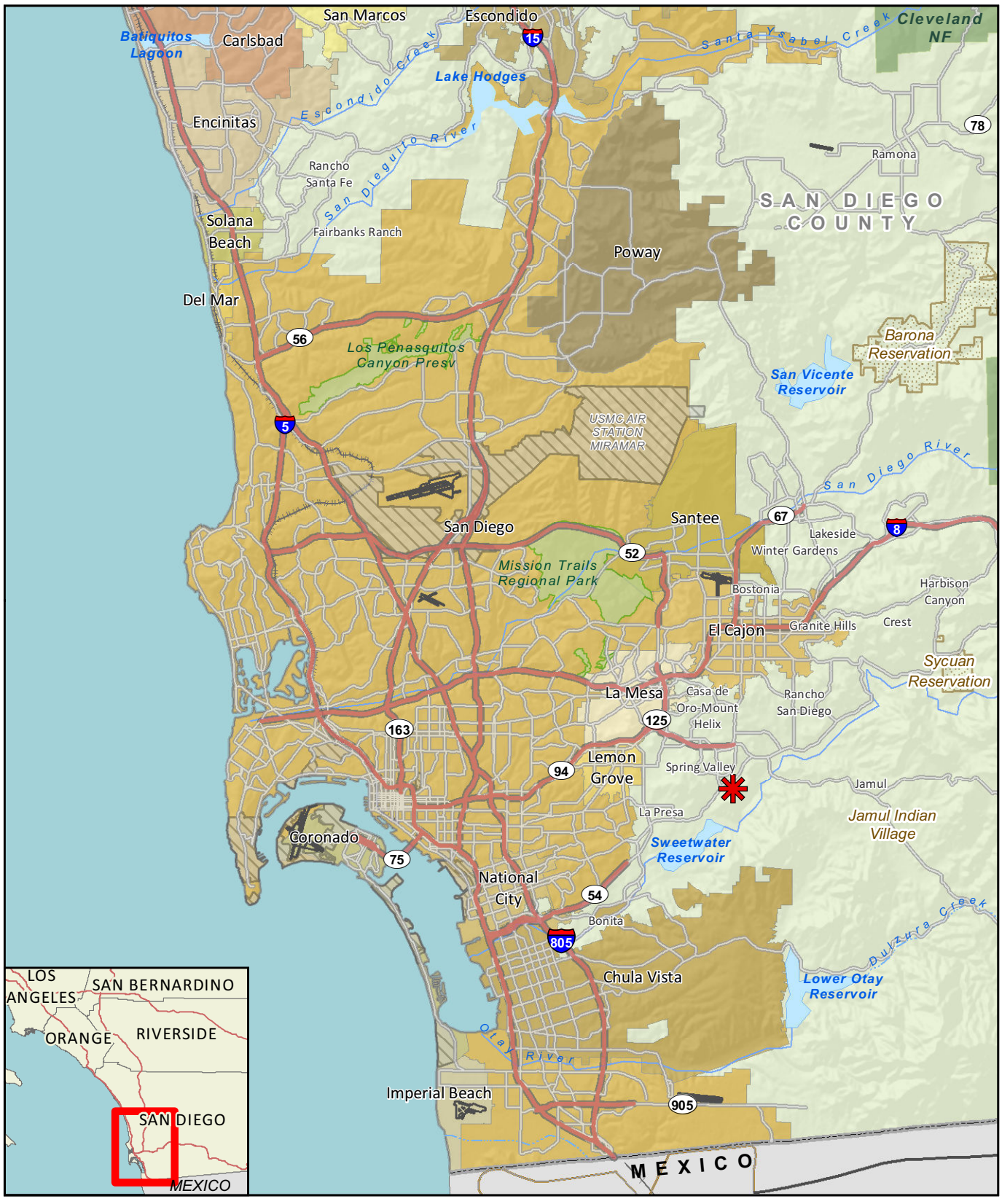

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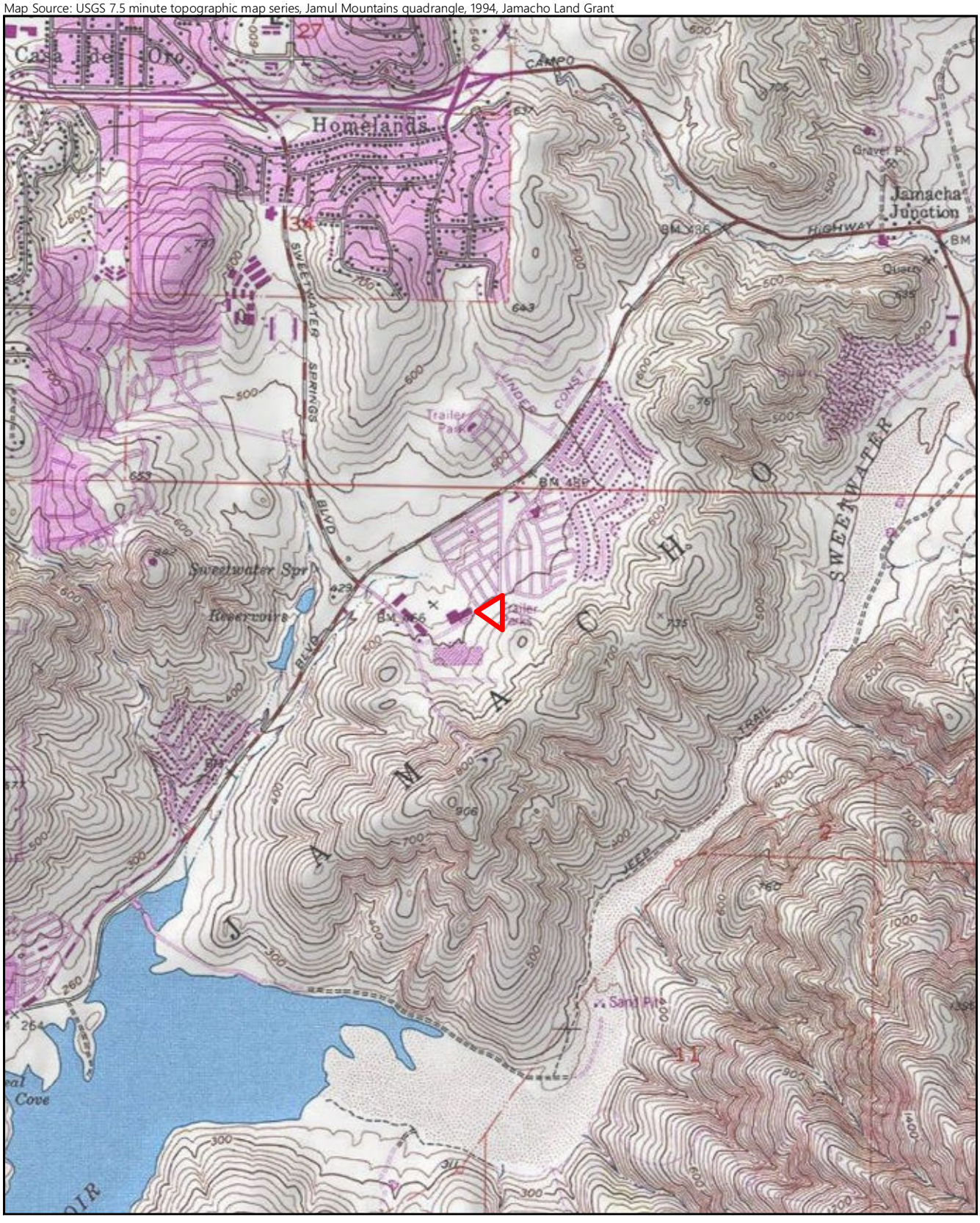
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, Jamul Mountains quadrangle, 1994, Jamacho Land Grant



Project Boundary

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FIGURE 2
Project Location on USGS Map

During spring 2021, the current owner cleared the property in conformance with the brush fire clearance requirement, and to provide fuel mod to the adjacent property owners and residents. The property has recently become a homeless encampment and presented a fire hazard and other safety concerns to the homeless trespassers and the adjacent mobile home park. Historic site condition photos have not been provided. Attachment 1 provides current photographs detailing the current site conditions. Figure 3 provides photopoint locations and provides an aerial showing the conditions of the site and adjacent landscape from April 2021.

1.3 Methods

Prior to conducting field surveys, RECON conducted an analysis of existing sensitive species data recorded within two miles of the project boundary. This analysis included searches of the U.S. Fish and Wildlife (USFWS) all-species occurrence database (USFWS 2021a) and critical habitat portal (USFWS 2021b), the SanBIOS database (County of San Diego 2021), and the California Natural Diversity Database (CNDDB; CDFW 2021a) and Amphibian and Reptile Atlas of Peninsular California (San Diego Natural History Museum [SDNHM] 2018); as well as reviews of the San Diego County Bird Atlas (Unitt 2004) and San Diego County Mammal Atlas (Tremor et al. 2017). Background research to assess the existing biological conditions also included a review of online aerial satellite imagery, USGS topographic map (USGS 1994), and U.S. Department of Agriculture (USDA) soil survey maps (USDA 1973).

RECON biologists Wendy Loeffler and Brian Parker conducted a general biological survey within the project boundary and a 100-foot survey buffer (collectively referred to as survey area) on Wednesday, June 2, 2021 between 8:50 a.m. and 10:50 a.m. Most of the survey area was covered on foot; however, some portions of the survey area were not accessible due to private property restrictions. Such areas were surveyed visually with the aid of binoculars from the nearest accessible location. The biologists mapped vegetation communities, recorded vegetation and habitat characteristics, and noted wildlife and plant species apparent at the time of the survey.

Given the recent clearing of all vegetation for fuel modification and homeless encampment safety considerations within the project site, vegetation was mapped based on the most recent aerial photograph (April 2021) and any forensic evidence of plant material, e.g., presence of leaf or limb detritus that could indicate the presence of certain species. All plant and animal species that were observed during the survey were noted; however, this was primarily restricted to the open space lands within the open space areas to the east. Zoological nomenclature is in accordance with the American Ornithological Society Checklist (Chesser et al. 2019) and Unitt (2004) for birds; Bradley et al. (2014) for mammals; Crother et al. (2017) for amphibians and reptiles; and SDNHM (2002) and Evans (2008) for invertebrates.

Determination of the potential for occurrence of listed, sensitive, or noteworthy species is based upon known ranges and habitat preferences for the species (Jennings and Hayes 1994; Zeiner et al. 1990; Unitt 2004; California Native Plant Society [CNPS] 2021; Reiser 2001), existing topography and soils within the survey area (USGS 1975; USDA 1973), species occurrence records from the California Natural Diversity Database (CNDDB; CDFW 2021a), the All Species Occurrences Database (USFWS 2021a), and SanBIOS points from the SanGIS Data Warehouse (County of San Diego 2021).

1.4 Environmental Setting

The survey area is located within a mosaic of commercial/industrial and residential development, and open space (see Figure 3). The open space to the east is the San Diego National Wildlife Refuge owned/administered by the USFWS.

Image Source: NearMap (flown April 2021)

Photo Point

Project Boundary

Survey Area

0 Feet 300

FIGURE 3

Project Location on Aerial Photograph

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Elevation of the survey area ranges from 480 to 574 feet above mean sea level, decreasing from southeast to northwest. No drainages were apparent on-site, and the topography of the site does not indicate any historic drainage system present on-site or in the immediate vicinity (see Figure 2).

The survey area supports one soil series—Friant rocky fine sandy loam, 30 to 70 percent slopes (USDA 1973). The Friant series consists of shallow and very shallow, well drained fine sandy loams that formed in material weathered from fine-grained metasedimentary rock. These soils are on mountainous uplands and slopes of 9 to 70 percent, with Friant rocky fine sandy loam occurring on 30 to 70 percent slopes. In representative profile the surface layer is dark-brown and brown, slightly acid fine sandy loam about 12 inches thick and is underlain by gray, hard, metasedimentary rock. Rock out crop covers 2 to 10 percent of the surface in some areas.

2.0 Regional Context

The project occurs within the Metro-Lakeside-Jamul segment of the MSCP County of San Diego Subarea Plan (Figure 4; County of San Diego 1997). The County prepared the MSCP Subarea Plan to guide implementation of the MSCP Plan in the South County, including the area of this project. Under the MSCP, the project site contains a small portion that have been mapped as a Pre-Approved Mitigation Area in the northeast corner and the southern portion of the site includes a small amount of mapped BRCA (see Figure 4). However, based on current site conditions, the site does not meet the criteria for a BRCA, as defined in the BMO (County of San Diego 2010c, see Attachment 1).

In addition to these MSCP designations, the site is identified by the USFWS as Quino checkerspot butterfly (*Euphdryas editha quino*) recommended survey area (USFWS 2014) and the site is located immediately adjacent to land mapped as Otay tarplant and coastal California gnatcatcher final critical habitat (see Figure 4).

3.0 Habitats/Vegetation Communities

Four vegetation communities/land cover types—Diegan coastal sage scrub (including disturbed), non-native grassland, eucalyptus woodland, and disturbed land—as well as urban/developed were identified within the survey area. Figure 5 provides the locations of each vegetation community or land cover type in the survey area. Table 1 lists the vegetation communities/land cover types and their acreages within the project site and the 100-foot survey buffer. As discussed above, this mapping is based primarily on a review of the most recent aerial photography given the recent clearing of the site for fuel modification and safety considerations.

Table 1
Vegetation Communities/Land Cover Types within the Project Survey Area

Type or Community (Holland Code as modified by Oberbauer)	MSCP Tier	Project Site (acres)	100-foot Survey Buffer (acres)	Total Survey Area (acres)
Diegan Coastal Sage Scrub (32500)	II	0.91	0.81	1.73
Diegan Coastal Sage Scrub – Disturbed (32500)	II	0.50	0.61	1.11
Non-native Grassland (42200)	III	0.52	0.18	0.71
Eucalyptus Woodland (79100)	IV	0.07	0.15	0.21
Disturbed Land (11300)	IV	0.00	0.15	0.15
Urban/Developed (12000)	--*	0.04	2.02	2.06
TOTAL		2.05	3.92	5.97

*No MSCP assigned tier.
Note: Any discrepancies in totals are due to rounding.

Image Source: NearMap (flown April 2021)

0 Feet 200

Project Boundary

Coastal California Gnatcatcher (*Polioptila californica californica*) USFWS Critical Habitat

Otay Tarplant (*Deinandra conjugens*) USFWS Critical Habitat

Quino Checkerspot Butterfly Survey Area

County of SD MSCP Sub Area Plan

Pre-Approved Mitigation Area

Hardline Preserve

Unincorporated Land in Metro-Lakeside-Jamul Segment

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FIGURE 4

Project in Relation to MSCP Preserve Area

Image Source: NearMap (flown April 2021)

Project Boundary
Survey Area

Vegetation Community

- Diegan Coastal Sage Scrub
- Diegan Coastal Sage Scrub - Disturbed
- Eucalyptus Woodland
- Non-native Grassland
- Disturbed Land
- Urban/Developed

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FIGURE 5
Existing Biological Resources

Diegan coastal sage scrub. Diegan coastal sage scrub (including the disturbed form) is the dominate vegetation community in the survey area. Within the project site it is mapped in the south, central portion and along a strip at the northern edge. Within the 100-foot survey buffer, this community is found within the open space preserve to the east and in the landscaping adjacent to the commercial properties in the south and southwestern part of the survey area. The species composition of this community on the project site is based on an evaluation of the coastal sage scrub to the east. This is mostly dominated by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*), intermixed with scattered white sage (*Salvia apiana*), deer weed (*Acmisponglaber*), laurel sumac (*Malosma laurina*), toyon (*Heteromeles arbutifolia*), and spiny redberry (*Ramnus crocea*). The understory seems to be dominated by mostly non-native annuals such as rattail sixweeks grass (*Festuca myuros*) and redstem filaree (*Erodium cicutarium*). Disturbed Diegan coastal sage scrub contains a higher cover of non-native grasses within the 100-foot survey buffer. On-site, the areas mapped as disturbed appear to have supported a higher percentage of non-native weed species, such as mustard (*Brassica* sp.), fennel (*Foeniculum vulgare*), and cardoon (*Cynara cardunculus* ssp. *flavescens*).

Non-native grassland. Non-native grassland occurs along the northern edge of the survey area (see Figure 5). It is dominated by non-native grasses such as wild oats (*Avena* sp.) and bromes (*Bromus* sp.).

Eucalyptus woodland. Eucalyptus woodland is mapped in three patches of the survey area: one small patch that is presumed to have occurred in the northern central part of the project site based on the aerial and plant material found on-site during the survey; and two areas within the 100-foot survey buffer adjacent to the commercial property along the western boundary (see Figure 5). It is dominated by gum trees (*Eucalyptus* sp.).

Disturbed habitat. Disturbed habitat only occurs in the 100-foot survey buffer along an established compacted dirt trail and an open area apparent between two of the commercial properties in the south portion of the survey area (see Figure 5). These areas are primarily devoid of vegetation.

Urban/developed land. Urban/developed land within the survey area consists of areas that have been constructed upon or support associated landscaped, ornamental vegetation. The majority of these are located in the 100-foot survey buffer, with only a small portion of landscaping occurring in a small patch in the northwest corner of the site (see Figure 5).

4.0 Special Status Species

Plant or wildlife species are considered special status if they are: (1) on List A, B, C, or D of the County Sensitive Plant List or in Group 1 or 2 of the County Sensitive Animal List (County of San Diego 2010b); (2) covered or listed as a narrow endemic under the MSCP (County of San Diego 2009); (3) listed by state or federal agencies as threatened or endangered or are proposed for listing; (4) included on CNPS California Rare Plant Ranks 1, 2, 3, or 4 (CNPS 2021); or (5) considered rare, endangered, or threatened by local conservation organizations or specialists.

Under Section 3503 of the California Fish and Game Code (CFGC), it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 of the CFGC prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs.

Given the recent clearing of the site for fuel modification and homeless encampment safety considerations, the site currently does not support any sensitive plant or wildlife species. The following discussion is based on an evaluation of potential to occur prior to the recent clearing and based on a review of recent aerial photography and species databases, and a survey of the adjacent open space.

4.1 Special Status Plant Species

Only one special status plant species, ashy spike-moss was observed within the survey area. Attachment 2 provides a complete list of plant species identified within the proposed project survey area during the biological resources survey. Attachment 3 summarizes special status plant species that have a potential to occur based on known locations, soil preferences for the species, species records from the CNDDB and other sites in the vicinity of the survey area. Three special status plant species have a moderate potential to occur within the survey area. A list of these species, and a brief description of their potential to occur are presented below.

- Otay tarplant (*Deinandra conjugens*) (state endangered, federally threatened, County MSCP Narrow Endemic, County List A)—This species was not found in the adjacent survey buffer, although CNDDB has a record of this species from 2019 in coastal sage scrub approximately 90 feet southeast of the project boundary (CDFW 2021a) and the open space to the east is identified as Otay tarplant critical habitat (see Figure 4). Based on this, there is a moderate potential for this species to have been present on-site, although suitability may be reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.

- San Diego barrel cactus (*Ferocactus viridescens*) (County List B)—This species was not detected in the adjacent open space; however, there are numerous CNDDB records of this species within two miles of the site (CDFW 2021a). Suitable coastal sage scrub was present on-site and is within the adjacent survey buffer; and there is a moderate potential for this species to have been present. Given the dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site, if this species was present, it was likely in small numbers.

- California adolphia (*Adolphia californica*) (County List B)—This species was observed just outside the adjacent survey buffer and the CNDDB has several records of this species within two miles of the project site (CDFW 2021a); thus, there is a moderate potential that this species was present on-site.

- Ashy spike-moss (*Selaginella cinerascens*) (County List D)—This species was observed within the adjacent survey buffer. Suitable coastal sage scrub was present on-site and is within the adjacent survey buffer; and there is a moderate potential for this species to have been present.

4.2 Special Status Wildlife Species

No special status wildlife species were observed within the survey area. Attachment 4 provides a complete list of wildlife species identified on-site during the biological resources survey. Attachment 5 summarizes the special status wildlife species that have a potential to occur based on known ranges, habitat preferences for the species, species occurrence records from the CNDDB, and species occurrence records from other sites in the vicinity of the project boundary. Nine special status wildlife species have a moderate potential to occur. A list of these species, and a brief description of their potential to occur is presented below.

- Crotch's bumble bee (*Bombus crotchii*) — Much of the project site is potentially suitable. The CNDDB has records of this species in the San Diego National Wildlife Refuge 0.9 mile to the east and on Dictionary Hill 1.3 mile to the west (CDFW 2021a).

- Quino checkerspot butterfly (*Euphydryas editha quino*) —The site is located within the USFWS Quino survey area and the USFWS and CNDDB have several database records dating to between 2001 and 2017 in high quality habitat in the San Diego National Wildlife Refuge within 0.25 to 0.40 mile to the east. Based on this, there is a

moderate potential for this species to have been present on-site, although suitability may be reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.

- Blainville's horned lizard (*Phrynosoma blainvillii*) — The coastal sage scrub on-site was likely of low quality; however, the immediately surrounding habitat to the east is of high quality. This species is known from several records within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill (CDFW 2021a).

- Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*) — There is suitable open coastal sage scrub on site and in the adjacent survey buffer. There are several older (1991 to 2003) records of this species within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill (CDFW 2021a).

- San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*) — The coastal sage scrub on-site and in the adjacent survey buffer are moderately suitable. There are several records from between 1995 and 2000 within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill (CDFW 2021a).

- Cooper's hawk (*Accipiter cooperii*) — The project site and surrounding areas contain tall gum trees that may provide suitable nesting habitat.

- Coastal California gnatcatcher (*Polioptila californica californica*) — Coastal sage scrub occurs on-site and is abundant in the San Diego National Wildlife Refuge to the east, which also supports critical habitat for this species; however, suitability is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are numerous database records in the immediate vicinity of the project site (CDFW 2021a).

- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) — Coastal sage scrub and grassland habitats occurred on site and in the San Diego National Wildlife Refuge to the east; however, suitability is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are numerous database records in the immediate vicinity of the project site (CDFW 2021a).

- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) — Coastal sage scrub and non-native grassland on site are potentially suitable. There are records of this species from 1996 on Sweetwater Authority property, one mile to the south, and from Dictionary Hill in 2003, 1.3 miles to the west (CDFW 2021a).

No large mammals were observed within the survey area (see Attachment 4). This site is surrounded on three sides by development and completely enclosed by chain-link perimeter fencing. While a large open space preserve is present to the east, the fencing and proximity to development is expected to reduce the potential for large mammals to access and use the project site with any regularity.

Gum trees on-site and tall gum trees along the perimeter of the site could support raptor nesting and perching. The site itself supports habitat suitable for raptor foraging, especially given the proximity of the site to the open space preserve to the east.

Coastal sage scrub and non-native grassland on site are potentially suitable to support migratory bird nesting.

5.0 Jurisdictional Wetlands and Waterways

There are no jurisdictional wetlands present on-site as the site supports upland vegetation. The site also does not support topography consistent with the presence of any waterway (see Figure 2).

6.0 Wildlife Movement and Nursery Sites

6.1 Habitat Connectivity and Wildlife Corridors

Wildlife movement corridors and habitat linkages are areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Corridors are generally local pathways connecting short distances usually covering one or two main types of vegetation communities. Linkages are landscape level connections between very large core areas and generally span several thousand feet and cover multiple habitat types. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors and linkages for wildlife travel. The habitat connectivity provided by corridors and linkages is important in providing access to mates, food, and water, allowing the dispersal of individuals away from population high-density areas, and facilitating the exchange of genetic traits between populations (Beier and Loe 1992).

This site is surrounded on three sides by development. While there is connection to a large open space preserve to the east, this site serves only as an extension of that open space, rather than providing any connectivity or linkage to other adjacent open space.

6.2 Nursery Sites

There was no indication that the site supports any wildlife nursery sites. Given that the site is surrounded by development on three sides and enclosed by a perimeter chain-link fence, it is unlikely that large mammals would rely on this property for continued persistence and there was no indication of dens used by medium-sized mammals. There was also no evidence of large bird roosting or breeding colonies, e.g., egret roosting sites.

7.0 Significance of Project Impacts and Proposed Avoidance and Mitigation

This section describes project impacts and recommended avoidance and mitigation measures based on the County's MSCP Subarea Plan (2009) and the County's Guidelines for Determining Significance (2010b).

7.1 Vegetation Community Impacts and Proposed Mitigation

The proposed project will construct a parking lot to support 69 delivery vans primarily within the central portion of the project site. However, based on the current state of the site following the recent clearing of the site for fuel modification and other safety considerations, and the small size and irregular shape of the site, we have assumed permanent impact to the entire site (Figure 6).

The project would cause direct permanent impacts to 2.05 acres of two sensitive vegetation communities, comprising 1.41 acres of Diegan coastal sage scrub, including the disturbed form (MSCP Tier II) and 0.52 acre of non-native grassland (MSCP Tier III; Table 2). Impacts to sensitive vegetation types would be considered significant and would require mitigation. The project would also impact 0.07 acre of eucalyptus woodland and 0.04 acre of urban/developed land. These impacts are not considered significant and would not require mitigation.

Image Source: NearMap (flown April 2021)

Project Boundary
Project Impacts
Survey Area

Vegetation Community

- Diegan Coastal Sage Scrub
- Diegan Coastal Sage Scrub - Disturbed
- Eucalyptus Woodland
- Non-native Grassland
- Disturbed Land
- Urban/Developed

0 Feet 100

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FIGURE 6
Impacts to Biological Resources

Table 2 Habitat/Vegetation Communities, Impacts, and Mitigation					
Habitat/ Vegetation Community	Existing On-site (acres)[1]	Impacts (acres)[1]	Mitigation Ratio[2]	Mitigation Required (acres)	Preserved On-site (acres)[1]
Diegan Coastal Sage Scrub, including disturbed (Tier II)	1.41	1.41	1:1	1.41	0
Non-native Grassland (Tier III)	0.52	0.52	0.5:1	0.26	0
Eucalyptus Woodland (Tier IV)	0.07	0.07	N/A	N/A	0
Disturbed Land (Tier IV)	0.00	0.00	N/A	N/A	0
Urban/Developed (no tier)	0.04	0.04	N/A	N/A	0
TOTAL	2.05	2.05	--	1.67	0

[1]Rounded to nearest tenth of an acre. Any discrepancies in totals are due to rounding.
[2]Mitigation ratio is based on impacted land not meeting BCRA status and off-site mitigation meeting BCRA criteria. Mitigation assumed to be completed through purchase of off-site credits.

The mitigation ratios shown in Table 2 are based on the Attachment M of the BMO (County of San Diego 2010c). Permanent impacts to sensitive vegetation communities would be mitigated off-site in the form of purchase of credits from a County-approved mitigation area. The proposed mitigation would reduce direct impacts to sensitive vegetation communities to a level of less than significant.

Indirect impacts to adjacent off-site sensitive vegetation communities may occur as a result of dust, chemical and particulate pollution, and introduction of non-native plant species during construction activities. To reduce impacts to adjacent sensitive vegetation communities, the following general avoidance and minimization measures are recommended for the proposed project:

- Appropriate Best Management Practices (e.g., silt fence, fiber rolls, drip pans beneath staged equipment) shall be employed during construction activities to prevent the release of chemicals or other substances that are potentially toxic or impactive to native habitats/flora/fauna.
- Water trucks shall be employed to manage the level of fugitive dust on the adjacent habitat.
- Temporary fencing (i.e., silt fencing and/or orange construction fencing) shall be installed along the project boundaries adjacent to native vegetation communities to ensure project activities stay within the designated work area.
- Trash, oil, parking, or other construction/development-related material/activities shall not be allowed outside any approved construction limits.
- Design the project so that all run-off from the parking lot will be directed away from the open space preserve land to the east. All lighting will be designed and installed so that all light will be directed away from the adjacent open space preserve to the east and away from the eucalyptus trees adjacent of the northwest corner of the site.

The above-recommended avoidance and minimization measures are anticipated to reduce indirect impacts to adjacent sensitive vegetation communities to a level of less than significant.

7.2 Special Status Species Impacts and Proposed Avoidance and Mitigation Measures

All criteria in the Guidelines for Determining Significance (County of San Diego 2010b) were assessed and only those with potential for significant impacts are discussed below.

7.2.1 Sensitive Plant Species

Otay tarplant (federally listed threatened, state listed endangered, County of San Diego List A) is known from the adjacent open space preserve to the east and this same adjacent land is mapped within federal critical habitat for this species. If present on-site, impacts to this species would be considered significant. Therefore, the following measures will be implemented by the applicant to reduce direct impacts and avoid potential indirect impacts to a level of less than significant.

- Prior to the start of construction, a pre-activity focused survey should be conducted by a qualified biologist to identify whether any Otay tarplant have regrown within the site.
    - If no Otay tarplant are detected, the site would require no additional measures to avoid or mitigate direct impacts on-site.
    - If Otay tarplant are detected, mitigation would be required. Per the County BMO (County of San Diego 2010c), the mitigation ratio for this species can range from 1:1 to 3:1. The applicant will consult with County staff to determine the appropriate mitigation ratio and location to reduce direct impacts to a level less than significant.

Avoidance measures described in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to Otay tarplant in the adjacent open space preserve to the east.

San Diego barrel cactus (County of San Diego List B, MSCP covered species) is known from the adjacent vicinity and has a moderate potential to have occurred on-site; however, suitability is reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site and the expectation of a critical population to be present is low. However, if present on-site, impacts to this species would be considered significant. Therefore, the following measures will be implemented by the applicant to reduce direct impacts and avoid potential indirect impacts to a level of less than significant.

- Prior to the start of construction, a pre-activity focused survey should be conducted by a qualified biologist to identify whether any San Diego barrel cactus have regrown within the site.
    - If no San Diego barrel cactus are detected, the site would require no additional measures to avoid or mitigate direct impacts on-site.
    - If San Diego barrel cactus are detected, mitigation would be required. Per the County BMO (County of San Diego 2010c), the mitigation ratio for this species can range from 1:1 to 3:1. In addition, per Attachment C of the County's Report Format, any cactus on-site should be salvaged and transplanted to an appropriate location (County of San Diego 2010a). The applicant will consult with County staff to determine the appropriate mitigation ratio and location to reduce direct impacts to a level less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to San Diego barrel cactus in the adjacent open space preserve to the east.

California adolphia (County of San Diego List B) is identified as having a moderate potential to have occurred on-site; however, suitability is reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site and the expectation

of a critical population to be present is low. However, if present on-site, impacts to this species would be considered significant. Therefore, the following measures will be implemented by the applicant to reduce direct impacts and avoid potential indirect impacts to a level of less than significant.

- Prior to the start of construction, a pre-activity focused survey should be conducted by a qualified biologist to identify whether any California adolphia have regrown within the site.
    - If no California adolphia are detected, the site would require no additional measures to avoid or mitigate direct impacts on-site.
    - If California adolphia are detected, mitigation would be required. Per the County BMO (County of San Diego 2010c), the mitigation ratio for this species can range from 1:1 to 3:1. The applicant will consult with County staff to determine the appropriate mitigation ratio and location to reduce direct impacts to a level less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to California adolphia in the adjacent open space preserve to the east.

Ashy spike-moss (County of San Diego List D) is identified as having a moderate potential to have occurred on-site given the presence in the open space preserve to the east. If present on-site, impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. Per the County's BMO, this habitat-based mitigation serves as mitigation for County List D plant species and would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to ashy spike-moss in the adjacent open space preserve to the east.

7.2.2 Sensitive Wildlife Species

Crotch's bumble bee (state candidate for listing) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much larger open space preserve not likely to significantly affect the species' long-term persistence in the region. Direct impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east.

Quino checkerspot butterfly (federally listed threatened, County of San Diego Group 1) is known from the adjacent open space preserve to the east and the site is located within the USFWS Survey Area. If present on-site, impacts to this species would be considered significant. Therefore, the following measures will be implemented by the applicant to reduce direct impacts and avoid potential indirect impacts to a level of less than significant.

- Prior to the start of construction, a pre-activity survey should be conducted by a qualified biologist (defined as a biologist familiar with the local host plants species for this butterfly) to identify whether any host plants for this species have regrown within the site.

  - If no host plant is detected, the site would require no additional measures to avoid or mitigate direct impacts on-site.

  - If any host plant is detected, the applicant may be required to have a permitted biologist conduct a focused survey to determine whether Quino checkerspot butterfly is present on-site. The applicant will need to consult with County staff and wildlife agencies to determine the appropriate mitigation measures to reduce direct impacts to a level less than significant.

- Avoidance measures described in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to Quino checkerspot butterfly in the adjacent open space preserve to the east.

Blainville's horned lizard (CDFW Species of Special Concern; County of San Diego Group 2, MSCP covered species) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much larger open space preserve not likely to significantly affect the species' long-term persistence in the region. Direct impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east.

Belding's orange-throated whiptail (CDFW Species of Special Concern; County of San Diego Group 2, MSCP covered species) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much larger open space preserve not likely to significantly affect the species' long-term persistence in the region. Direct impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east.

San Diegan tiger whiptail (CDFW Species of Special Concern; County of San Diego Group 2) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much larger open space preserve not likely to significantly affect the species' long-term persistence in the region. Direct impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas, will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east.

Cooper's hawk (CDFW Watch List; County of San Diego Group 1 species) has moderate potential to use the tall trees of the eucalyptus woodland for nesting. Direct impacts to and indirect noise impacts within 500-feeet of nesting Cooper's hawk may occur if vegetation clearing, grubbing, grading, or construction is conducted during this species' nesting season (March 1 to July 31). Avoidance measures for potential impacts to Cooper's hawk are discussed below in Section 7.2.3 and Section 7.2.4 which are expected to avoid direct impacts. In addition, the project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. These measures are expected to reduce impacts to this species to a level of less than significant.

Coastal California gnatcatcher (federally listed threatened; CDFW Species of Special Concern; County of San Diego Group 1; MSCP covered species) is known from the adjacent open space preserve to the east and this same adjacent land is mapped within federal critical habitat for this species. Direct permanent impacts of 1.41 acres of Diegan coastal sage scrub are identified and will be mitigated off-site as discussed in Section 7.1. Direct impacts and indirect noise impacts to nesting coastal California gnatcatchers in the adjacent off-site habitat may occur if vegetation clearing, grubbing, grading, or construction is conducted during this species nesting season of March 1 to August 15 (County of San Diego 2009). Therefore, avoidance measures, which will be implemented by the applicant, are discussed below and are expected to avoid direct impacts and reduce the potential indirect impacts to a level of less than significant.

- To avoid impacts to coastal California gnatcatcher, grading, brush clearing, and all other construction within 500 feet of the edge of the site should be conducted between August 16 and February 28. However, if construction must occur between March 1 and August 15, the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for nesting birds within suitable adjacent habitat to determine whether avian species are nesting within 500 feet of the construction area.

    - If coastal California gnatcatcher are nesting within 500 feet of the construction boundary, construction activity should be avoided within 500 feet of the active nest, if possible. If construction must occur within 500 feet of an active nest temporary sound barriers may be required or grading may be restricted in construction areas near the nest site to reduce noise levels. Temporary sound barriers must be placed within the project footprint and not in the habitat. In addition, an acoustician shall measure noise levels during construction activities at the edge of the project footprint near the occupied habitat closest to the nest. Generally, noise levels are required by the County to be less than 60 decibels (dB) averaged over a one-hour period on an A-weighted decibel (dB[A]) scale (i.e., 1 hour L_{eq}/dB[A]) or the ambient noise level, whichever is greater.

    - If no coastal California gnatcatcher are observed nesting within 500 feet of the project boundary, no grading or construction restrictions associated with coastal California gnatcatcher would apply. No restrictions are required for this species outside its nesting season.

In addition, the project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. These measures are expected to reduce impacts to this species to a level of less than significant.

Southern California rufous crowned sparrow (CDFW Watch List; County of San Diego Group 2; MSCP covered species) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much larger open space preserve not likely to significantly affect the species' long-term persistence in the region. In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east. Direct impacts to nesting birds may occur if vegetation clearing, grubbing, grading, or construction is conducted during this species' nesting season. Avoidance measures for potential impacts to nesting birds, including southern California rufous-crowned sparrow, are discussed below in Section 7.2.4, which are expected to avoid direct impacts. In addition, the project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. These measures are expected to reduce impacts to this species to a level of less than significant.

San Diego black-tailed jackrabbit (CDFW Species of Special Concern; County of San Diego Group 2) is a mobile species that would have the ability to avoid direct mortality and the loss of a small area of habitat adjacent to a much

larger open space preserve not likely to significantly affect the species' long-term persistence in the region. However, direct impacts to this species would be considered significant. The project will be mitigating the loss of habitat for this species through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to less than significant.

In addition, avoidance measures listed in Section 7.1, including use of water trucks and delineation of work areas will prevent any indirect impacts to the adjacent habitat in the adjacent open space preserve to the east.

7.2.3 Foraging Habitat for Raptors

The entire project boundary provides potential raptor foraging habitat. However, impacts to these areas are not expected to substantially disrupt foraging, as these impact areas are small and linear, occur along an existing road, and are subjected to frequent human and vehicular activity and noise disturbance. In addition, larger expanses of suitable foraging habitat are located immediately to the east in the open space preserve. The project will be mitigating the loss of habitat through the purchase of in-kind mitigation credits at an approved mitigation bank. This habitat-based mitigation would reduce the level of direct impact to raptor foraging habitat to less than significant.

7.2.4 Nesting Success of Special Status Bird Species

Because suitable habitat for tree-nesting raptor species, including Cooper's hawk, is present within and adjacent to the proposed project boundary, direct impacts and indirect noise impacts have the potential to occur if initial grading and construction occur during the raptor breeding season. Avoidance measures are discussed below.

- If construction occurs during the raptor breeding season of January 15 through July 15, a qualified biologist shall conduct a pre-construction clearance survey for nesting raptors in suitable nesting habitat (e.g., mature trees within southern willow scrub or eucalyptus woodland) that occurs within 500 feet of the project boundary. If any active raptor nest is located, a 500-foot buffer zone or other appropriate buffer determined by the qualified biologist, will be delineated.

- If project activities must occur within this designated 500-foot buffer zone, the following steps are proposed to avoid impacts to tree-nesting raptors. Prior to implementing these steps, the applicant shall consult with the County and Wildlife Agencies for concurrence.

    - The qualified biologist shall monitor nesting activity daily until project activities are no longer occurring within the designated buffer zone or until fledglings become independent of the nest.

    - The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing or disrupting the nesting activities.

    - The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as (1) turning off vehicle engines and other equipment whenever possible to reduce noise, and/or (2) working in other areas until the young have fledged.

    - If the biologist determines that nesting activity does not appear to be disturbed by project activities, construction may continue with daily monitoring by a qualified biologist to provide guidance until the fledglings are independent of the nest.

Suitable nesting habitat for special status species is present off-site in the adjacent open space preserve to the east. Therefore, direct impacts and indirect noise impacts have the potential to occur if vegetation clearing, grubbing, grading, or construction occurs during the general avian breeding season of February 15 through September 15. Measures to avoid impacts are discussed below. Avoidance measures for coastal California gnatcatcher are discussed above in Section 7.2.2 and are expected to prevent direct impacts and reduce the potential indirect impacts to this species to a level of less than significant.

- In order to prevent direct and indirect impacts to other special status species known to occur adjacent to the project, initial grading and construction within the proposed project boundary should take place outside the general avian breeding season of February 15 and September 15. If construction occurs between February 15 and September 15, a qualified biologist shall conduct a pre-construction clearance survey for nesting birds within the proposed project boundary and 300-foot buffer. If an active nest is located, a 300-foot buffer or other appropriate buffer zone determined by the qualified biologist will be flagged for avoidance.

- If project activities occur within this designated 300-foot buffer zone, the following steps are proposed to avoid impacts to nesting birds. Prior to implementing these steps, the applicant shall consult with the County and Wildlife Agencies for concurrence.

    - A qualified biologist shall monitor nesting activity daily until project activities are no longer occurring within the designated buffer zone or until fledglings become independent of the nest.

    - The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing or disrupting the nesting activities.

    - The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as (1) turning off vehicle engines and other equipment whenever possible to reduce noise, and (2) working in other areas until the young have fledged.

    - If the biologist determines that nesting activity does not appear to be disturbed by project activities, construction may continue with the presence of the qualified biologist to provide guidance until the fledglings are independent of the nest.

Potential impacts to nests or eggs of birds protected by CFGC 3503 would be avoided through the above measures proposed for special status wildlife species.

7.2.5 Indirect Long-term Impacts

The project proposes to create a parking lot for 69 delivery vans. The project would not alter animal access or human visitation to the surrounding habitat areas. The project includes avoidance measures to reduce potential indirect effects on sensitive vegetation and special status species to a level of less than significant. The project is not expected to cause impacts from increased noise and/or nighttime lighting; thus, there would be no long-term indirect impacts.

7.3 Federal Wetlands Impacts and Proposed Mitigation

As there are no federal or other jurisdictional wetlands or waterways present, no impacts to wetland or water resources would occur and no mitigation would be required.

7.4 Wildlife Movement and Nursery Sites Impacts and Proposed Mitigation

As the site does not function as a wildlife movement corridor and there is no indication that the site supports any wildlife nursery sites, the project will not result in any impact to these resources and no mitigation would be required.

7.5 Local Policies, Ordinances, and Adopted Plans Impacts and Proposed Mitigation

With the proposed avoidance, minimization, and mitigation measures in place, the proposed project is not anticipated to significantly conflict with any local policies or ordinances protecting biological resources or with the provisions of an adopted habitat conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. All criteria in Section 4.5 of the Guidelines for Determining Significance (County of San Diego 2010b) were assessed and only those with potential for significant impacts are discussed below.

- The project has potential to impact coastal California gnatcatcher, which is a federally listed species. Mitigation measures discussed above in Section 7.2 would reduce the impacts to less than significant.

- The project may result in impacts to nests or eggs protected by CFGC during initial grading and vegetation removal. Mitigation measures discussed above in Section 7.2 would reduce the impacts to less than significant.

The following provides an evaluation of the Preserve Design Criteria as presented in the Biological Mitigation Ordinance Attachment G:

1. The site does not support any wetlands and thus this criterion does not apply.

2. Given the small size and triangular shape of the site, the entire site is considered to be impacted and no habitat areas are proposed for conservation; thus, this criterion does not apply.

3. Given the small size and triangular shape of the site, the entire site is considered to be impacted and no habitat areas are proposed for conservation; thus, this criterion does not apply.

4. Given the small size and triangular shape of the site, the entire site is considered to be impacted and no habitat areas are proposed for conservation. In addition, this site is surrounded by development to the north, west, and south. The land to the east supports an extensive open space preserve (San Diego National Wildlife Refuge) and the only area that could be subject to edge effects. However, the development of this small area with respect to the large expanse of the adjacent refuge should result in have negligible edge effects; thus this criterion does not apply.

5. Given the small size and triangular shape of the site, the entire site is considered to be impacted and no habitat areas are proposed for conservation; thus, this criterion does not apply.

6. The project is not expected to have supported core populations of any narrow endemic species. Avoidance measures, including project design to direct run-off away from the adjacent open space reserve and to direct nighttime lighting away from the open space preserve to the east and the eucalyptus trees to the northwest will further protect sensitive biological resources.

7. The site does not support biological linkages or biological core resource areas; thus, this criterion does not apply.

8. Purchase of off-site mitigation credits for the impacts to sensitive vegetation and the implementation of the avoidance and mitigation measures described above in Sections 7.1 and 7.2 will comply with this criterion.

The following provides an evaluation of the Design Criteria for Linkages and Corridors in the Biological Mitigation Ordinance Attachment H:

- This site does not support any linkages or serve as a wildlife corridor give that the site is surrounded by commercial and residential development to the north, west, and south. While there is connection to a large open space preserve to the east, this site serves only as an extensive of that open space, rather than providing any connectivity or linkage to other adjacent open space. This the criteria identified in Attachment H of the Biological Mitigation Ordinance do not apply.

7.6 Conclusions

Implementation of the avoidance and mitigation measures described above would reduce impacts to sensitive habitat and reduce the potential impacts to special status species to a level of less than significant.

8.0 Cumulative Impacts

The proposed project's potential impacts to sensitive habitats and species would be avoided through specific design considerations or mitigated to a level of less than significant. Therefore, when considered in conjunction with past and present projects located in the vicinity of the proposed project boundary, the proposed project would not contribute to a cumulatively considerable impact.

If you have any questions regarding this letter report or the biological resources present on the site, please do not hesitate to contact me.

Sincerely,

Wendy Loeffler
County Approved Biologist

WEL:jg

cc: Dean Navarro, Greenlaw Partners
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10.0 Preparers and Persons/Organizations Contacted

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11.0 Attachments

1. Current Site Photographs
2. Plants Species Observed
3. Sensitive Plant Species with the Potential to Occur
4. Wildlife Species Observed
5. Sensitive Wildlife Species with the Potential to Occur

ATTACHMENTS

ATTACHMENT 1

Current Site Photographs

PHOTOGRAPH 1
View of Project Site Looking Northwest

PHOTOGRAPH 2
View of Project Site Looking South

PHOTOGRAPH 3
View of Project Site Looking West

PHOTOGRAPH 4
View of Project Site Looking West Along Northern Edge of Site

ATTACHMENT 2

Plant Species Observed

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
LYCOPODS			
SELAGINELLACEAE	SPIKE-MOSS FAMILY		
Selaginella cinerascens	ashy spike-moss	DCSS	N
ANGIOSPERMS: MONOCOTS			
IRIDACEAE	IRIS FAMILY		
Sisyrinchium bellum	western blue-eyed grass	DCSS	N
POACEAE (GRAMINEAE)	GRASS FAMILY		
Avena fatua	wild oat	NNG	I
Bromus diandrus	ripgut grass	DCSS, NNG	I
Bromus hordeaceus	soft chess	DCSS, NNG	I
Bromus rubens [=*Bromus madritensis* ssp. *rubens*]	red brome	DCSS, NNG	I
Pennisetum setaceum	crimson fountain grass	DEV	I
Stipa miliacea var. *miliacea* [=*Piptatherum miliaceum* ssp. *miliaceum* and *Oryzopsis miliacea*]	smilo grass	NNG	I
ANGIOSPERMS: DICOTS			
ANACARDIACEAE	SUMAC OR CASHEW FAMILY		
Malosma laurina	laurel sumac	DCSS	N
Schinus terebinthifolius	Brazilian pepper tree	DEV, DCSS	I
APIACEAE (UMBELLIFERAE)	CARROT FAMILY		
Foeniculum vulgare	fennel	DCSS, NNG	I
APOCYNACEAE	DOGBANE FAMILY		
Nerium oleander	common oleander	DEV	I
ASTERACEAE	SUNFLOWER FAMILY		
Artemisia californica	California sagebrush	DCSS	N
Baccharis sarothroides	broom baccharis	DCSS	N
Centaurea melitensis	tocalote, Maltese star-thistle	DCSS, NNG	I
Corethrogyne filaginifolia var. *filaginifolia*	California sand-aster	DCSS	N
Cynara cardunculus ssp. *flavescens*	cardoon, artichoke thistle	DCSS, NNG	I
Erigeron [=*Conyza*] *bonariensis*	flax-leaved horseweed	DCSS	I

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
Eriophyllum confertiflorum var. *confertiflorum*	long-stem golden-yarrow	DCSS	N
Glebionis coronaria [=*Chrysanthemum coronarium*]	garland, crown daisy	DCSS, NNG	I
Gutierrezia californica	California matchweed	DCSS	N
Isocoma menziesii	coastal goldenbush	DCSS	N
Pseudognaphalium [=*Gnaphalium*] *californicum*	California everlasting, green everlasting	DCSS	N
BRASSICACEAE (CRUCIFERAE)	**MUSTARD FAMILY**		
Brassica sp.	mustard	DCSS	I
Hirschfeldia incana	short-pod mustard	DCSS, NNG	I
CACTACEAE	**CACTUS FAMILY**		
Cylindropuntia [=*Opuntia*] *prolifera*	coast cholla	DCSS	N
Opuntia ficus-indica	mission prickly-pear, Indian fig	DCSS, DEV	I
Opuntia littoralis	coast prickly-pear, shore cactus	DCSS	N
CONVOLVULACEAE	**MORNING-GLORY FAMILY**		
Calystegia macrostegia	morning-glory	DCSS	N
CRASSULACEAE	**STONECROP FAMILY**		
Crassula ovata	jade plant	DEV	I
EUPHORBIACEAE	**SPURGE FAMILY**		
Croton [=*Eremocarpus*] *setiger*	turkey-mullein, dove weed	DCSS	N
FABACEAE (LEGUMINOSAE)	**LEGUME FAMILY**		
Acmispon glaber [=*Lotus scoparius*]	deerweed, California broom	DCSS	N
GERANIACEAE	**GERANIUM FAMILY**		
Erodium cicutarium	redstem filaree	DCSS	I
LAMIACEAE	**MINT FAMILY**		
Salvia apiana	white sage	DCSS	N
Salvia columbariae	chia	DCSS	N
Salvia mellifera	black sage	DCSS	N
MYRTACEAE	**MYRTLE FAMILY**		
Eucalyptus sp.	gum tree	EW, DCSS	I

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
MYRSINACEAE	MYRSINE FAMILY		
Lysimachia [=*Anagallis*] *arvensis*	scarlet pimpernel	DCSS	I
POLYGONACEAE	BUCKWHEAT FAMILY		
Eriogonum fasciculatum	California buckwheat	DCSS, NNG	N
RHAMNACEAE	BUCKTHORN FAMILY		
Rhamnus crocea	spiny redberry	DCSS	N
ROSACEAE	ROSE FAMILY		
Heteromeles arbutifolia	toyon, Christmas berry	DCSS	N
RUBIACEAE	MADDER FAMILY		
Galium sp.	bedstraw, cleavers	DCSS	N
SOLANACEAE	NIGHTSHADE FAMILY		
Nicotiana glauca	tree tobacco	NNG	I

Note: Plant nomenclature taken from Brenzel 2001, Jepson Flora Project (eds.) 2019, Rebman and Simpson 2014, County of San Diego 2010b, and USDA 2013

HABITATS

DCSS = Diegan oastal sage scrub (including disturbed)
DEV = Urban/developed
EW = Eucalyptus woodland
NNG = Non-native grassland

ORIGIN

N = Native to locality
I = Introduced species from outside locality

ATTACHMENT 3

Sensitive Plant Species with the Potential to Occur

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
LYCOPODS							
SELAGINELLACEAE SPIKE-MOSS FAMILY							
Selaginella cinerascens ashy spike-moss	–/–	4.1	List D	Perennial rhizomatous herb; chaparral, coastal scrub; elevation 65-2,100 feet.	No	Moderate	Coastal sage scrub is present, this species was observed in the adjacent survey buffer.
ANGIOSPERMS: DICOTS							
ASTERACEAE SUNFLOWER FAMILY							
Ambrosia pumila San Diego ambrosia	–/FE	1B.1	List A MSCP Narrow Endemic	Perennial herb (rhizomatous); chaparral, coastal sage scrub, valley and foothill grasslands, often on upper terraces of rivers and drainages, often in disturbed areas; blooms April-October; elevation less than 1,400 feet. Many occurrences extirpated in San Diego County.	No	Low	Coastal sage scrub is present, although no drainages are present on-site. The nearest records are along the Sweetwater River approximately 1 mile to the east.
Bahiopsis [=*Viguiera*] *laciniata* San Diego viguiera	–/–	4.3	List B	Perennial shrub; chaparral, coastal sage scrub; blooms February–June; elevation less than 2,500 feet.	No	Low	Although coastal sage scrub was present on-site and the habitat appeared suitable; this species was not present in the adjacent survey buffer and there are no database records of this species within 2 miles of the project site. Suitability is also reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
Deinandra [=*Hemizonia*] *conjugens* Otay tarplant	CE/FT	1B.1	List A MSCP Narrow Endemic	Annual herb; clayey soils of coastal scrub openings, valley and foothill grassland; blooms April–June, elevation less than 1,000 feet.	No	Moderate	This species was not found on site or in the adjacent survey buffer, although suitable habitat is present. However, suitability is reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. The parcel to the east is identified as Otay tarplant critical habitat and CNDDB has a record of this species from 2019 in coastal sage scrub approximately 90 feet southeast of the project boundary.
Ericameria palmeri var. *palmeri* [=*E. palmeri* ssp. *palmeri*] Palmer's goldenbush	–/–	1B.1	List B MSCP	Perennial evergreen shrub; chaparral coastal sage scrub, typically in mesic areas; blooms July–November; elevation less than 2,000 feet. Known in California from sixteen occurrences all of which are in San Diego County. Additional populations in Baja California, Mexico.	No	Low	This species was not detected on site or in the adjacent survey buffer. Coastal sage scrub is mapped on site and there are several CNDDB records within two miles; however, suitability is reduced due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
Isocoma menziesii var. *decumbens* decumbent goldenbush	–/–	1B.2	List B	Perennial shrub; chaparral, coastal sage scrub; sandy soils, often in disturbed areas; blooms April–November; elevation less than 500 feet.	No	Low	Although coastal sage scrub occurred on site, suitable sandy soils are not present. The nearest record of this species is from 2010 coastal sage scrub and riparian scrub approximately 0.3 mile to the southwest.
Senecio aphanactis chaparral ragwort; rayless ragwort; groundsel	–/–	2B.2	List B	Annual herb; chaparral, cismontane woodland, coastal sage scrub; blooms January–May; elevation less than 2,700 feet.	No	Low	Coastal sage scrub is present, but no chaparral or woodland habitat occurs on site, so habitat suitability is low. The only database record of this species is a 1935 collection specimen along the northern slope of San Miguel Mountain.
BRASSICACEAE **MUSTARD FAMILY**							
Lepidium virginicum var. *robinsonii* Robinson's peppergrass	–/–	4.3	List A	Annual herb; coastal sage scrub, chaparral; blooms January–July; elevation less than 2,900 feet.	No	Low	Coastal sage scrub was present on site; however, the only nearby database record of this species is a 2008 collection along Millar Ranch Road approximately 2 miles to the east.
CACTACEAE **CACTUS FAMILY**							
Cylindropuntia californica var. *californica* [=*Opuntia parryi* var. *serpentina*] snake cholla	–/–	1B.1	List A MSCP Narrow Endemic	Perennial stem succulent; chaparral, coastal sage scrub; blooms April–May; elevation 100–500 feet.	No	Low	Coastal sage scrub was present on site; however, this species was not detected in the adjacent survey buffer and the only database records of this species are from along the Sweetwater River approximately 1.5 mile to the east.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
Ferocactus viridescens San Diego barrel cactus	–/–	2B.1	List B MSCP	Perennial stem succulent; chaparral, coastal sage scrub, valley and foothill grasslands, vernal pools; blooms May–June; elevation less than 1,500 feet.	No	Moderate	Coastal sage scrub was present on site and is within the adjacent survey buffer. There are numerous CNDDB records of this species within 2 miles of the site.
Dichondra occidentalis western dichondra	–/–	4.2	List D	Perennial herb (rhizomatous); chaparral, cismontane woodland, coastal sage scrub, valley and foothill grasslands; blooms January –July; elevation less than 1,650 feet.	No	Low	Coastal sage scrub is only marginally suitable due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There is only one database record of this species in the vicinity, a 2006 observation on the USFWS National Wildlife Refuge 0.5 mile to the northeast.
Dudleya variegata variegated dudleya	–/–	1B.2	List A MSCP Narrow Endemic	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms April–June; elevation less than 1,900 feet.	No	Low	Coastal sage scrub is only marginally suitable due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. The nearest records of this species is along the Sweetwater River within the USFWS National Wildlife Refuge 0.7 to 0.8 mile to the southeast.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status State/ Federal Status	 CNPS Rank	 County of San Diego	Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
ERICACEAE **HEATH FAMILY**							
Comarostaphylis diversifolia ssp. *diversifolia* summer holly	–/–	1B.2	List A	Perennial evergreen shrub; chaparral; blooms April–June; elevation 100–2,600 feet.	No	None	No chaparral habitat is present on site. The nearest database records of this species are on San Miguel Mountain, 1.6 miles to the southeast.
Astragalus deanei Dean's milkvetch	–/–	1B.1	List A	Perennial herb; chaparral, coastal sage scrub, riparian, blooms February–May, elevation 250–2,300 feet. San Diego County endemic. Known from fewer than 15 occurrences within tributaries to Otay and Sweetwater rivers.	No	Low	While coastal sage scrub was present, there are no associated drainages or tributaries and the nearest database record of this species is from a presumed extirpated population in the vicinity of the Sweetwater Reservoir.
LAMIACEAE **MINT FAMILY**							
Acanthomintha ilicifolia San Diego thornmint	CE/FT	1B.1	List A MSCP Narrow Endemic	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	No	None	Although coastal sage scrub is present, no friable clay soils were detected. The only database record of this species within 2 miles of the project site is a 1920 collection from near Sweetwater River.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
Clinopodium [=*Satureja*] *chandleri* San Miguel savory	–/–	1B.2	List A MSCP	Perennial shrub; chaparral, cismontane woodland, coastal sage scrub, riparian woodland, valley and foothill grasslands; blooms March–July; elevation less than 3,500 feet.	No	Low	Coastal sage scrub was present on-site but this species was not observed in the adjacent buffer and suitability is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. No chaparral, riparian, or native grasslands are present. The nearest database record is a 1991 observation on the northern slope of San Miguel Mountain 1.1 mile to the southeast.
Salvia munzii Munz's sage	–/–	2B.2	List B	Perennial evergreen shrub; chaparral, coastal sage scrub, blooms February–April; elevation 400–3,500 feet.	No	Low	Coastal sage scrub on site is potentially suitable; however, this species was not detected in the adjacent survey buffer, and it would have been apparent at the time of the survey. In addition, the site was subject to disturbance from homeless encampments and the apparent level of weeds in the center of the site, reducing habitat suitability. There are several database records in the San Diego National Wildlife Refuge and on Dictionary Hill within 2 miles of the site.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
PICRODENDRACEAE BITTER-TREE FAMILY							
Tetracoccus dioicus Parry's tetracoccus	–/–	1B.2	List A MSCP	Perennial deciduous shrub; chaparral, coastal sage scrub; blooms April–May; elevation 500–3,500 feet.	No	None	Coastal sage scrub is only marginally suitable due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. No chaparral is present. The only record of this species within 2 miles of the site is a 1998 report identifying this species on the San Ysidro Mountains.
RHAMNACEAE BUCKTHORN FAMILY							
Adolphia californica California adolphia	–/–	2B.1	List B	Perennial deciduous shrub; Diegan coastal sage scrub and chaparral; clay, silt loam, and sandy loam soils; blooms December–May; elevation 100–2,500 feet.	No	Moderate	This species was observed just outside the adjacent survey buffer. The CNDDB has several records of this species within 2 miles of the project site.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status State/ Federal Status	 CNPS Rank	 County of San Diego	Habitat/Preference/ Requirements/Blooming Period	Detected On-Site Yes/No	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
ANGIOSPERMS: MONOCOTS							
LILIACEAE LILY FAMILY							
THEMIDACEAE BRODIAEA FAMILY							
Bloomeria [=*Muilla*] *clevelandii* San Diego goldenstar	–/–	1B.1	List A MSCP	Perennial herb (bulbiferous); chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; clay soils; blooms May; elevation 170–1,500 feet.	No	Low	Coastal sage scrub is only marginally suitable due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. The nearest recent database records are from Dictionary Hill 1.5 mile to the west and the northern end of the Sweetwater Reservoir 1.3 mile to the south.

Attachment 3
Sensitive Plant Species Observed or with the Potential to Occur

FEDERAL CANDIDATES AND LISTED PLANTS

FE = Federally listed endangered
FT = Federally listed threatened

STATE LISTED PLANTS

CE = State listed endangered
CR = State listed rare

CALIFORNIA NATIVE PLANT SOCIETY (CNPS): CALIFORNIA RARE PLANT RANKS (CRPR)

1A = Species presumed extinct.
1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
2A = Plants presumed extirpated in California, but more common elsewhere.
2B = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).
.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known).

COUNTY OF SAN DIEGO

List A = Rare, threatened, or endangered in California and elsewhere.
List B = Rare, threatened, or endangered in California but more common elsewhere
List D = Limited distribution and uncommon, but not rare or endangered
MSCP = Multiple Species Conservation Program covered species

ATTACHMENT 4

Wildlife Species Detected

Attachment 4 Wildlife Species Observed			
Scientific Name	Common Name	Occupied Habitat	Evidence of Occurrence
REPTILES (Nomenclature from Crother 2017)			
PHRYNOSOMATIDAE	**SPINY LIZARDS**		
Uta stansburiana elegans	western side-blotched lizard	DCSS, NNG, DIS, DEV	O
BIRDS (Nomenclature from Chesser et al.2019 and CDFW 2021b)			
ODONTOPHORIDAE	**NEW WORLD QUAIL**		
Callipepla californica	California quail	DCSS	V
PHASIANIDAE	**PHEASANTS & GROUSE**		
Gallus gallus domesticus	chicken (I)	DEV	V
CHARADRIIDAE	**LAPWINGS & PLOVERS**		
Charadrius vociferus	killdeer	NNG	V
COLUMBIDAE	**PIGEONS & DOVES**		
Streptopelia decaocto	Eurasian collared-dove (I)	DEV	O
Zenaida macroura	mourning dove	DCSS, DEV	O
CUCULIDAE	**CUCKOOS & ROADRUNNERS**		
Geococcyx californianus	greater roadrunner	DCSS	O
TROCHILIDAE	**HUMMINGBIRDS**		
Calypte anna	Anna's hummingbird	DCSS, DEV	O, V
PICIDAE	**WOODPECKERS & SAPSUCKERS**		
Melanerpes formicivorus	acorn woodpecker	DEV	V
TYRANNIDAE	**TYRANT FLYCATCHERS**		
Tyrannus verticalis	western kingbird	DCSS	V
CORVIDAE	**CROWS, JAYS, & MAGPIES**		
Aphelocoma californica	California [=western] scrub-jay	DCSS	V
Corvus brachyrhynchos	American crow	DCSS	O, V
SYLVIIDAE	**BABBLERS**		
Chamaea fasciata	wrentit	DCSS	V

Attachment 4 Wildlife Species Observed			
Scientific Name	Common Name	Occupied Habitat	Evidence of Occurrence
MIMIDAE	MOCKINGBIRDS & THRASHERS		
Mimus polyglottos	northern mockingbird	DCSS, DEV	O, V
PASSERELLIDAE	NEW WORLD PASSERINES		
Melozone [=*Pipilo*] *crissalis*	California towhee	DCSS	V
FRINGILLIDAE	FINCHES		
Spinus [=*Carduelis*] *psaltria*	lesser goldfinch	DCSS	V
Haemorhous [=*Carpodacus*] *mexicanus*	house finch	DCSS, NNG, DEV	V, O
LEPORIDAE	RABBITS & HARES		
Lepus californicus bennettii	San Diego black-tailed jackrabbit	DCSS	S
Sylvilagus audubonii	desert cottontail	DCSS	O
SCIURIDAE	SQUIRRELS & CHIPMUNKS		
Otopermophilus [=*Spermophilus*] *beecheyi*	California ground squirrel	DCSS, NNG	B
GEOMYIDAE	POCKET GOPHERS		
Thomomys bottae	Botta's pocket gopher	DCSS, NNG	B
MURIDAE	MICE & RATS		
Neotoma sp.	woodrat	DCSS	N
CANIDAE	CANIDS		
Canis latrans	coyote	DCSS, NNG	S
MEPHITIDAE	SKUNKS		
Mephitis mephitis	striped skunk	DCSS, DEV	M

(I) = Introduced species

HABITATS

DCSS = Diegan coastal sage scrub (including disturbed)
DEV = urban/Developed
DIS = Disturbed
NNG = Non-native grassland

EVIDENCE OF OCCURRENCE

B = Burrow
M = Smell
N = Nest/Midden
O = Observed
S = Scat
V = Vocalization

ATTACHMENT 5

Sensitive Wildlife Species with the Potential to Occur

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
INVERTEBRATES (Nomenclature from San Diego Natural History Museum 2002)					
APIDAE **HONEY BEES, BUMBLE BEES, AND ALLIES**					
Crotch bumble bee *Bombus crotchii*	SCE	Coastal areas, open grasslands, shrub habitats.	No	Moderate	Much of the project site is potentially suitable. The CNDDB has records of this species in the San Diego National Wildlife Refuge 0.9 mile to the east and on Dictionary Hill 1.3 mile to the west.
LYCAENIDAE **BLUES, COPPERS, & HAIRSTREAKS**					
Hermes copper *Lycaena hermes*	FC, *	Chaparral and coastal sage scrub where host plant, spiny redberry occurs. Adult emergence late May to July.	No	Low	Although coastal sage scrub occurs on site and spiny redberry was observed in the adjacent survey buffer, the habitat on site is low quality due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There is only one database record of 2004 detection in the San Diego National Wildlife Refuge 1.2 mile to the east.

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Thorne's hairstreak *Callophrys* [=*Mitoura*] *thornei*	MSCP, County Group 1	Southern interior cypress forest. Host plant Tecate cypress (*Cupressus forbesii*). Only known from Otay Mountain Tecate cypress stands.	No	None	There is no indication of Tecate cypress occurring on site or in the adjacent survey buffer.
NYMPHALIDAE BRUSH-FOOTED BUTTERFLIES					
Quino checkerspot *Euphydryas editha quino*	FE, County Group 1	Open, dry areas in foothills, mesas, lake margins. Larval host plant *Plantago erecta*. Adult emergence mid-January through April.	No	Moderate	Although coastal sage scrub occurs on site, the habitat on site is reduced in quality due to dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. However, the site is located within the USFWS Quino survey area. The USFWS and CNDDB have several database records dating to between 2001 and 2017 in high quality habitat in the San Diego National Wildlife Refuge within 0.25 to 0.40 mile to the east.

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
REPTILES (Nomenclature from Crother et al. 2017)					
IGUANIDAE **IGUANID LIZARDS**					
Blainville's [=Coast] horned lizard *Phrynosoma blainvillii* [= *P. coronatum blainvillii*]	SSC, MSCP, County Group 2, *	Chaparral, coastal sage scrub with fine, loose soil. Partially dependent on harvester ants for forage.	No	Moderate	The coastal sage scrub on site was likely of low quality; however, the immediately surrounding habitat to the east is of high quality. This species is known from several records within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill.
TEIIDAE **WHIPTAIL LIZARDS**					
Belding's orange-throated whiptail *Aspidoscelis hyperythra beldingi* [=*Cnemidophorus hyperythrus beldingi*]	SSC, MSCP, County Group 2	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.	No	Moderate	There is suitable open coastal sage scrub on site and in the adjacent survey buffer. There are several older (1991 to 2003) records of this species within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill.

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
San Diegan tiger whiptail *Aspidoscelis tigris stejnegeri*	SSC, County Group 2	Coastal sage scrub, chaparral, woodlands, and streamsides where plants are sparsely distributed.	No	Moderate	The coastal sage scrub on site and in the adjacent survey buffer are moderately suitable. There are several records from between 1995 and 2000 within two miles, including the San Diego National Wildlife Refuge and Dictionary Hill.
ANNIELLIDAE LEGLESS LIZARDS					
Rosy boa *Lichanura orcutti*	*	Coastal sage scrub, chaparral in inland and desert locales with rocky soils.	No	Low	Coastal sage scrub habitat on site is of marginal quality due dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.
Baja California coachwhip *Coluber fuliginosus*	SSC	Open areas such as grassland, shrubland, and coastal sand dunes.	No	Low	Habitat on site is of marginal quality due dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site.

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
CROTALIDAE **RATTLESNAKES**					
Red diamond rattlesnake *Crotalus ruber*	SSC, County Group 2	Desert scrub and riparian, coastal sage scrub, open chaparral, grassland, and agricultural fields.	No	Low	The coastal sage scrub habitat on site seemed to provide suitable habitat for this species; however, suitability is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are numerous records of this species within 2 miles of the project site.
BIRDS (Nomenclature from Chesser et al. 2019 and CDFW 2021)					
ACCIPITRIDAE **HAWKS, KITES, & EAGLES**					
Cooper's hawk (nesting) *Accipiter cooperii*	WL, MSCP, County Group 1	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.	No	Moderate	The project site and surrounding areas contain tall gum trees that may provide suitable nesting habitat.
ALAUDIDAE **LARKS**					
California horned lark *Eremophila alpestris actia*	WL, County Group 2	Sandy shores, mesas, disturbed areas, grasslands, agricultural lands, sparse creosote bush scrub.	No	Low	Habitat on site is only marginally suitable. There is a record of this species from 1996 on Sweetwater Authority property approximately 1 mile to the south.

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
TROGLODYTIDAE WRENS					
Coastal cactus wren *Campylorhynchus brunneicapillus sandiegensis*	SSC, MSCP, County Group 1	Maritime succulent scrub, coastal sage scrub with native cactus thickets. Rare localized resident.	No	Low	Habitat on site is largely unsuitable. Although individual cactus were potentially present and were observed in the adjacent survey buffer, there was no evidence of suitable thickets were present on site and none were detected in the surrounding areas.
POLIOPTILIDAE GNATCATCHERS					
Coastal California gnatcatcher *Polioptila californica californica*	FT, SSC, MSCP, County Group 1	Coastal sage scrub, maritime succulent scrub. Resident.	No	Moderate	Coastal sage scrub occurs on site and is abundant in the San Diego National Wildlife Refuge to the east, which also supports critical habitat; however, suitability on-site is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are numerous database records in the immediate vicinity of the project site.

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PARULIDAE WOOD WARBLERS					
PASSERELLIDAE NEW WORLD PASSERINES					
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	WL, MSCP, County Group 1	Coastal sage scrub, chaparral, grassland. Resident.	No	Moderate	Coastal sage scrub and grassland habitats occurred on site and in the San Diego National Wildlife Refuge to the east; however, suitability is reduced given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are numerous database records in the immediate vicinity of the project site.
Grasshopper sparrow (nesting) *Ammodramus savannarum*	SSC, County Group 1	Tall grass areas. Localized summer resident, rare in winter.	No	None	The project site and surrounding areas lack suitable tall grassland habitats.

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Bell's sage sparrow *Artemisiospiza* [=*Amphispiza*] *belli*	WL, County Group 1	Chaparral, coastal sage scrub. Localized resident.	No	Low	Coastal sage scrub on site was likely marginally suitable given dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. This species is known from only one 2003 record on Dictionary Hill 1.3 mile to the west.
MAMMALS (Nomenclature from Jones et al. 1997 and Hall 1981)					
VESPERTILIONIDAE **VESPER BATS**					
Pallid bat *Antrozous pallidus*	SSC, County Group 2	Arid deserts and grasslands. Day and night roosts in rock crevices in outcrops and cliffs, caves, mines, trees, bridges, and other human structures. Roosts tend to be warm and elevated. Forage for large-bodied arthropods over open shrublands, grasslands, and orchards.	No	Low	Habitat on site lacks sufficient large outcrops, caves, or mines for roosting. The only records of this species in the vicinity date to the 1930's and lack clear location information.

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Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Townsend's [=western] big-eared bat *Corynorhinus townsendii*	SSC, County Group 2	Roosts primarily in large caves and mines but will occasionally use buildings. Forages in edge habitats along streams, especially near woodlands. Travels up to 100 miles while foraging (WBWG 2017).Roosts extremely sensitive to disturbance.	No	None	Habitat on site lacks sufficient caves or mines for roosting. There is a record of an audio recording of this species in 2006 along the Sweetwater River 1.1 mile to the east; however, no information on a potential roosting location was provided.
Western red bat *Lasiurus blossevillii*	SSC, County Group 2	Occurs throughout California, and western Nevada, east into Arizona and Utah. Roosts in foliage of riparian trees, particularly willows, sycamores, and cottonwoods. Feeds on a variety of moths and other flying insects.	No	None	Trees within and adjacent to the project site (gum and pepper trees) are not appropriate for roosting. There are records of this species along the Sweetwater River 0.7 to 1.1 mile to the east.
MOLOSSIDAE FREE-TAILED BATS					
Western mastiff bat *Eumops perotis californicus*	SSC, County Group 2	Roosts mainly in cliff crevices at least 10 feet above ground. Occurs in coastal and desert scrub, riparian woodland, and pine forests. Forages on large moths and other flying insects (Tremor et al 2017).	No	None	Habitat on site lacks large outcrops or cliffs to provide suitable roosting habitat. There are records of this species along the Sweetwater River 0.7 to 1.1 mile to the east.

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Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Pocketed free-tailed bat *Nyctinomops femorosaccus*	SSC, County Group 2	Roosts in crevices in vertical cliffs and quarries. Forages over a variety of habitats for flying beetles and large moths (Tremor et al 2017). Ranges from Orange County south through San Diego and east through southern Arizona (Harvey et al 2011).	No	None	Habitat on site lacks vertical cliffs to provide suitable roosting habitat. There are records of this species along the Sweetwater River 0.7 to 1.1 mile to the east.
Big free-tailed bat *Nyctinomops macrotis*	SSC, County Group 2	Ranges from South America up into the southwestern United States. Primarily a winter migrant to San Diego County. Maternity colonies are formed in June, when the species mainly out of our range. Roosts in crevices in vertical cliffs in scrub, riparian, and forest habitats. Feeds on moths (Tremor et al 2017.	No	None	Although coastal sage scrub is present, no vertical cliffs are present for roosting habitat. There are records of this species along the Sweetwater River 0.7 mile to the east.
LEPORIDAE RABBITS & HARES					
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	SSC, County Group 2	Open areas of scrub, grasslands, agricultural fields.	No	Moderate	Coastal sage scrub and non-native grassland on site are potentially suitable. There are records of this species from 1996 on Sweetwater Authority property 1 mile to the south and from Dictionary Hill in 2003 1.3 mile to the west.

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MUSTELIDAE **WEASELS, OTTERS, & BADGERS**					
American badger *Taxidea taxus*	SSC, MSCP, County Group 2	Grasslands, Sonoran desert scrub.	No	Low	Habitat on site is low quality due dense development in the surrounding areas to the south, north, and west, disturbance from homeless encampments, and apparent level of weeds in the center of the site. There are no recent records of this species in the vicinity; however, there is one record of a museum specimen captured at an unknown date at the Sweetwater Reservoir 2 miles to the southwest.
CERVIDAE **DEER**					
Southern mule deer *Odocoileus hemionus fuliginata*	MSCP, County Group 2	Many habitats.	No	Low	Although coastal sage scrub and non-native grassland were present, the site is fenced on all sides and is bounded to the north, west, and south by development, making it less suitable.

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STATUS CODES

Listed/Proposed

FE = Listed as endangered by the federal government
FT = Listed as threatened by the federal government
CE = Listed as endangered by the state of California

Other

FC = Federal candidate for listing (taxa for which the U.S. Fish and Wildlife Service has on file sufficient information on biological vulnerability and threat(s) to support proposals to list as endangered or threatened; development and publication of proposed rules for these taxa are anticipated)
WL = California Department of Fish and Wildlife watch list species
MSCP = County of San Diego Multiple Species Conservation Program covered species
SCE = State candidate for listing as Endangered
SSC = California Department of Fish and Wildlife species of special concern
* = Taxa listed with an asterisk fall into one or more of the following categories:

- Taxa considered endangered or rare under Section 15380(d) of CEQA guidelines
- Taxa that are biologically rare, very restricted in distribution, or declining throughout their range
- Population(s) in California that may be peripheral to the major portion of a taxon's range but which are threatened with extirpation within California
- Taxa closely associated with a habitat that is declining in California at an alarming rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands)