
Appendix C

Biological Resources Technical Memorandum

MEMORANDUM

To: Kara Peterson, San Diego State University
From: Kimberly Narel, Biologist, Dudek
Subject: SDSU Imperial Valley Off-Campus Center – Calexico, Affordable Student Housing Project – Biological Resources Technical Memorandum
Date: December 12, 2024
cc: Dylan Ayers, Callie Amoaku, Mollie Brogdon, Sarah Lozano, Dudek; Michael Haberkorn, Gatzke Dillon & Ballance
Attachments: A – Figures
B – Site Photographs
C – Species Compendium
D – Special-Status Plant Species Potential to Occur
E – Special-Status Wildlife Species Potential to Occur

Dudek has conducted an evaluation pursuant to the requirements of the California Environmental Quality Act (CEQA), California Public Resources Code 21000, et seq., to determine the presence and potential impacts related to biological resources associated with the proposed San Diego State University (SDSU) Calexico Affordable Student Housing Project (Project or proposed Project), to be located at the SDSU Imperial Valley Off-Campus Center located in Calexico, California. This technical memorandum provides the methods and results of the biological resources investigation, discussion of special-status biological resources, if present, an analysis of project impacts, and a discussion of proposed mitigation, if required.

1 Project Overview and Background

In September 2003, the California State University (CSU) certified an environmental impact report for the SDSU Imperial Valley Master Plan Project (State Clearinghouse No. 2002051010) and approved a Campus Master Plan for the expansion and improvement of the SDSU Imperial Valley Off-Campus Center, which includes locations in Calexico and Brawley, both located in Imperial County (SDSU 2003). The Off-Campus Center is an extension of SDSU's main campus in San Diego and furthers the University's regional educational mission to provide additional educational opportunities to the outlying communities of Imperial County. The previously certified and approved Campus Master Plan and EIR provided the authorization necessary for enrollment of 850 full-time equivalent (FTE)¹ students at the Off-Campus Center, corresponding associated faculty and staff, and a framework for development of the facilities necessary to serve this projected enrollment and campus population.

The Off-Campus Center - Calexico is approximately 8.3 acres in size and is located in the City of Calexico (City). Most of the Calexico location is built out, consisting of several educational and support facilities. The environmental impacts associated with development of the Off-Campus Center – Calexico were evaluated at a program level of review in the 2003 EIR. In the CSU's continuing effort to build out the Imperial Valley Off-Campus Center and provide

¹ A full-time equivalent (FTE) student is one full-time student taking 15 course credits, or 3 part-time students each taking 5 course credits.

additional educational opportunities, SDSU presently proposes construction and operation of a four-building complex that would provide affordable student housing at the Calexico location for 80 students and a resident manager. Additional details regarding the proposed housing is provided below.

2 Project Location and Existing Conditions

The Off-Campus Center – Calexico is located at 720 Heber Avenue in downtown Calexico, approximately 0.5 miles north of the United States–Mexico border (see Figure 1, Regional Map). Regional access to the Off-Campus Center is provided via SR-111 and SR-98 to the north. The Calexico location is bordered by four streets: Heber Avenue to the west, Sherman Street to the north, Blair Avenue to the east, and 7th Street to the south. Residential uses bound the Calexico complex to the north, east, south, and west. Other surrounding uses include Calexico High School, located northeast, and Calexico City Hall, located immediately south. The Off-Campus Center - Calexico currently consists of 17 buildings and an associated surface parking lot (see Figure 2, Vicinity Map, and Figure 3A, Existing Campus Master Plan).

As a state entity, the CSU/SDSU is not subject to local government plans, regulations, and guidelines, such as those contained in the City’s General Plan. The above notwithstanding, for information purposes, the Off-Campus Center - Calexico is zoned as Open Space and is designated as Public Facilities in the City’s General Plan (City of Calexico 2015a).

The proposed Project site is approximately 0.58 acres in size (25,320 square feet) and is located at the southeast corner of the campus, at the northwest corner of East 7th Street and Blair Avenue (see Figure 2). The entirety of the Project site has previously been graded and is relatively flat in nature, with an average elevation of 3.5 feet above mean sea level. The Project site encompasses the locations identified in the Campus Master Plan as future Building 21 (see Figure 3A and Figure 3B, Proposed Campus Master Plan). The Project site consists of vacant and undeveloped land with two trees located along the northern boundary of the site. A chain-link fence separates the Project site from the recently removed temporary Campus Buildings 201, which were located immediately west of the Project site.

3 Project Description

3.1 Affordable Student Housing Complex

The proposed Project would involve the construction of a single-story, four-building complex approximately 12,840 square feet in size that would provide for affordable student housing. The complex would include three student housing buildings, including one smaller live-in unit building, and a community building. Two of the three proposed residential buildings would each be approximately 5,500 square feet in size and would include five four-bedroom, two-bathroom apartment units, totaling 40 student beds per building (two student beds per bedroom, 80 student beds in total). The third proposed residential building would be a live-in manager unit that would consist of a single two-bedroom, one-bathroom apartment. The proposed live-in unit would also include approximately 100 square feet of office space that is intended to provide a space for tenant meetings, social services, or counseling. All apartment units would also be equipped with a living area and kitchen. The proposed community building program would be approximately 840 square feet and include laundry, mail, restroom, electrical, and maintenance facilities. The mail room would be located outside, under the shaded amenity patio of the community building (see Table 1).

Table 1. Affordable Student Housing Complex Area Calculations

	Quantity	Area (Square Feet)	Beds
Residential Buildings (3)			
4-Bedroom, 8-Bed Unit	5	5,150	40
4-Bedroom, 8-Bed Unit	5	5,150	40
Live-In Unit	1	1,000	2
Office (Included in Live-In Unit)	N/A	N/A	N/A
<i>Subtotal</i>	<i>11</i>	<i>11,300</i>	<i>82</i>
Community Building (1)			
Laundry Room	1	300	N/A
Service Rooms	4	450	N/A
Restroom	2	100	N/A
Mail/Package (Outside)	1	270	N/A
<i>Subtotal</i>	<i>N/A</i>	<i>1,150</i>	<i>N/A</i>
Other			
Trash/Recycling Enclosure	1	850	N/A
Open Space	N/A	2,300	N/A
Landscaping/hardscaping	N/A	12,500	N/A
<i>Subtotal</i>	<i>N/A</i>	<i>13,650</i>	<i>N/A</i>
Combined Total	N/A	26,100	82

Note: N/A = not applicable.

All square foot amounts presented in the table are approximate amounts only and may not add to the site plan area totals described in this document due to rounding.

Other on-site proposed amenities include a courtyard, bike racks, and a community waste enclosure. The courtyard would be approximately 1,600 square feet and would be centrally located in the proposed complex (see Figure 4, Site Plan). Approximately 15 bike racks would be provided throughout the Project site. A community waste enclosure at the northeast corner of the Project site would allow residents a convenient place to dispose of waste and recyclables.

3.1.1 Operation

The Off-Campus Center - Calexico, including the Project site, is owned and operated by the CSU/SDSU. The CSU Board of Trustees, on behalf of SDSU, is the lead agency responsible for certifying the adequacy and completeness of this document and approval of the proposed Project. SDSU and the IVCCD have received joint funding under the State of California Higher Education Student Housing Grant Program to construct the proposed Project.

To support basic housing needs for students in the Imperial Valley, SDSU and IVCCD have executed a 30-year master lease agreement that details operation of the Project. This agreement dictates that 40 of the 82 proposed student beds would be reserved for IVCCD students who attend the Imperial Valley College in Imperial. Likewise, 40 of the proposed 82 beds, would be reserved for SDSU Off-Campus Center - Calexico students. A 2-bedroom unit would also provide living space for on-site management. SDSU would be responsible for operating, managing, and maintaining the proposed Project once operational.

Student beds made available under the proposed Project would be leased/rented to eligible low-income students. Eligible low-income students are defined as having 30% of 50% of the Annual Median Income for Imperial County. In the event, after a good faith outreach effort, there is not sufficient demand from students meeting the eligibility requirements within 90 days of the start of the fall semester, unassigned beds may be leased at market rates to SDSU and IVCCD students not meeting the low-income eligibility requirements. In addition to meeting the low-income criteria, eligible students would be required to be enrolled students and take a minimum average of 12 degree-applicable units per semester term, or the quarterly equivalent (with exceptions permitted), to facilitate timely degree completion.

3.1.2 Other Project Elements

Building and Site Design

The proposed buildings have been designed to reflect the character and massing of the existing Off-Campus Center - Calexico, as well as the surrounding neighborhood. Building design is centered around a courtyard-style housing complex and would consist of smooth stucco walls with downspouts and rafters, punctuated by composite terra cotta-colored roof tile accents and windows. Maximum building heights would range from 14 feet to 18 feet.

Landscaping, Other Site Improvements, and Lighting

The Project would include approximately 16,000 square feet of on-site landscaping and hardscape improvements (i.e., pedestrian walkways). All proposed landscaping would consist of drought-tolerant, indigenous plants. The landscape scheme would include shrubs, hedges, and a variety of trees. A total of 39 trees would be added to the Project site including five fan palms, eight mesquite trees, six evergreen elms, and 20 yucca trees.

All exterior on-site lighting would be hooded or shielded, directed downward, and would be compliant with applicable standards for lighting control and light pollution reduction (i.e., Title 24, American National Standards Institute/Illuminating Engineering Society).

The proposed complex would be secured via an iron security fence that would measure 6 feet in height and run approximately 64 linear feet, connecting to the proposed buildings. Access to the complex would only be available to residents and their guests via two pedestrian gates located at the northwestern corner and southern portion of the proposed complex. The gates would be equipped with security card access for residents.

Utilities and Public Services

New points of connection for domestic water, fire supply water, sewer, storm drainage and electrical connections from existing utility lines would be required to serve the proposed Project. Potable water service, as well as sewer collection services at the Project site, would be provided by the City. The Project would connect to an existing sanitary sewer maintenance access line located in Blair Avenue via new 6-inch mains. Connections for water (including domestic, fire, and irrigation) would be from an existing water main located in Blair Avenue. Distribution water pipes would be extended underground to serve each proposed building. A new water meter would be located in the proposed maintenance room in the community building. Adequate water treatment capacity and supply and sewer treatment capacity exists within the City's water and sewer system to accommodate the Project; therefore, no capacity upgrades to infrastructure would be necessary.

Stormwater drainage includes two stormwater catch basins. One basin would be located on the eastern boundary of the Project site, and the second would be situated immediately east of the existing chain-link fence at the western boundary of the Project site. The proposed catch basins would function as both water quality and flood control features, by filtering out surface water contaminants and slowing stormwater runoff prior to stormwater discharge into the City's stormwater system via one new storm drain located in the southeast corner of the Project site.

Electrical services within the Project area are provided by Imperial Irrigation District, which provides electric power to over 158,000 customers in the Imperial Valley in addition to areas of Riverside and San Diego counties (IID 2024). New utility connections and infrastructure would be required to support electrical services on site. The Project would connect to on-site electrical power infrastructure via an existing 12kV, three phase, three wire, 60 Hertz overhead line routed along East 7th Street. No natural gas usage is proposed for the Project.

The Project would require a new point of connection for on-site telecommunications and would connect to the existing AT&T communications via the on-campus minimum point of entry.

Access, Circulation, and Parking

Regional access to the Project site is provided via SR-111 and SR-98 to the north. Local access is provided via Blair Avenue and East 7th Street. Parking to the Project site is available in the existing campus parking lot, immediately north of the Project site, which has sufficient capacity to serve the proposed Project. On-site circulation improvements would consist of additional paved pathway/pedestrian walkway features throughout the proposed complex and along the northern boundary of the Project site (see Figure 4). Emergency access would be provided directly adjacent to the Project site on East 7th Street and Blair Avenue.

3.1.3 Design Standards and Energy Efficiency

In May 2014, the CSU Board of Trustees broadened the application of sustainable practices to all areas of the university by adopting the first systemwide sustainability policy, which applies sustainable principles across all areas of university operations, including facility operations and utility management. In May 2024, the CSU Sustainability Policy was updated to expand on existing sustainability goals (CSU 2024). The CSU Sustainability Policy seeks to integrate sustainability into all facets of the CSU, including academics, facility operations, the built environment, and student life (CSU 2018). Relatedly, the state has also strengthened energy-efficiency requirements in the California Green Building Standards Code (Title 24 of the California Code of Regulations).

As a result, all CSU new construction, remodeling, renovation, and repair projects, including the proposed Project, would be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable state energy codes and regulations. Progress submittals during design are monitored for individual envelope, indoor lighting, and mechanical system performances. In compliance with these goals, the proposed Project would be equipped with solar ready design features that would facilitate and optimize the future installation of a solar photovoltaic (PV) system.

3.1.4 Off-Site Improvements

Off-site improvements would include the resurfacing of a portion of Blair Avenue adjacent to the eastern boundary of the Project site that would be disturbed as a result of trenching to make necessary connections to the existing

water main and sanitary sewer maintenance access. Any area disturbed as a result of this connection within Blair Avenue would be resurfaced to existing conditions. All off-site improvements would occur within the Blair Avenue right-of-way.

3.1.5 Construction

Construction would be performed by qualified contractors. Plans and specifications would incorporate stipulations regarding standard CSU/SDSU requirements and acceptable construction practices, such as those set forth in the SDSU Stormwater Management Plan, CSU Seismic Policy, The CSU Office of the Chancellor Guidelines, and the CSU Sustainability Policy, regarding grading and demolition, safety measures, vehicle operation and maintenance, excavation stability, erosion control, drainage alteration, groundwater disposal, public safety, and dust control.

Construction Timeline

Construction of the proposed Project would take approximately 17 months to complete and is estimated to begin as early as January 2025 and be completed by May 2026, with occupancy planned for fall 2026. Construction activities would generally occur Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m., with the potential for weekend construction on Saturday between 9:00 a.m. and 5:00 p.m. No construction would occur on Sundays or holidays or at night.

Construction Activities

A construction mobilization or staging area would be located immediately northeast of the proposed Project site and would occupy approximately 8,000 square feet. The area would be located east of existing Campus Building 6, west of Blair Avenue, and south of the existing parking lot (see Figure 2 and Figure 3A). To accommodate use of this area, four trees would be removed.

Construction would include site preparation, grading and excavation, utility installation/trenching, building foundation pouring, building construction, and landscaping. Excavation depths are anticipated to be 3 feet below grade. The majority of waste (i.e., excavated gravel/soil) generated during Project construction would be balanced/used within the site. Approximately 2,600 cubic yards of soil would be removed from the site and exported to Republic Services Allied Imperial Landfill, approximately 12 miles north. The entire Project site, including construction mobilization area (approximately 34,000 square feet in total) would be disturbed as a result of Project construction. Two trees would be removed from the Project site to accommodate the proposed Project.

Table 2 displays the construction equipment anticipated to be used during construction.

Table 2. Anticipated Construction Equipment

Aerial Lifts	Pressure Washers
Air Compressors	Pumps
Cement and Mortar Mixers	Rollers
Concrete/Industrial Saws	Rough Terrain Forklifts
Dumpers/Tenders	Rubber-Tired Dozers
Excavators	Rubber-Tired Loaders
Forklifts	Scrapers

Table 2. Anticipated Construction Equipment

Generator Sets	Signal Boards
Graders	Skid Steer Loaders
Off-Highway Tractors	Surfacing Equipment
Off-Highway Trucks	Sweepers/Scrubbers
Other Construction Equipment	Tractors/Loaders/Backhoes
Other General Industrial Equipment	Trenchers
Other Material Handling Equipment	Welders
Plate Compactors	

Source: Dorsey and Nielson Construction Inc, pers. comm., 2024

Construction Waste

The Project would generate construction debris during on-site clearing activities. In accordance with Section 5.408 of the California Green Building Standards Code, the Project would implement a construction waste management plan for recycling and/or salvaging for reuse of at least 65% of nonhazardous construction/demolition debris. Additionally, the Project would be required to meet Leadership in Energy and Environmental Design v4 requirements for waste reduction during construction. Solid waste generated during construction would be hauled off site to the Republic Services Allied Imperial Landfill at 104 East Robinson Road in Imperial, California.

4 Analysis Methodology

The analysis presented here considers the potential environmental impacts of the proposed project relative to existing conditions. Establishment of the project site’s existing biological resource conditions has been prepared using information contained in the previously certified 2003 SDSU Imperial Valley Master Plan EIR (SDSU 2003), in addition to the following methods, described below.

4.1 Literature Review

For this biological resources assessment, “special-status” species are those that are (1) listed, proposed for listing, or candidates for listing as threatened or endangered under the federal Endangered Species Act; (2) listed or candidates for listing as threatened or endangered under the California Endangered Species Act; (3) a state fully protected species; (4) a California Department of Fish and Wildlife (CDFW) Species of Special Concern; (5) a United States Fish and Wildlife Service Bird of Conservation Concern; or (6) a species listed on the California Native Plant Society Inventory of Rare and Endangered Plants with a California Rare Plant Rank of 1B or 2B.

Other special-status biological resources considered include sensitive vegetation communities. Sensitive vegetation communities are those communities identified as high priority for inventory in the List of Vegetation Alliances and Associations (CDFW 2024a) by a state rarity rank of S1, S2, or S3.

Special-status biological resources potentially present in the work area were identified through a literature search using CDFW’s California Natural Diversity Database (CDFW 2024b), the California Native Plant Society Rare Plant Inventory (CNPS 2024), and the CDFW Information for Planning and Consultation (USFWS 2024a). The National

Wetlands Inventory (USFWS 2024b), the National Hydrology Database (USGS 2024), and the U.S. Department of Agriculture's Natural Resource Conservation Service Web Soil Survey databases (USDA 2024) were also referenced to determine the presence of potential wetlands or other aquatic features on site. Searches were completed for the Calexico U.S. Geological Survey 7.5-minute quadrangle, within which the project is located, and the five surrounding quadrangles.

4.2 Field Reconnaissance

Dudek Biologist Dylan Ayers conducted a general biological reconnaissance survey and examined the project site and surrounding 100-foot study area buffer on June 14, 2024, from 12:15 p.m. to 2:15 p.m. (see Attachment B, Site Photographs). The survey was conducted with clear skies, wind ranging between 1 mph and 3 mph, and temperatures ranged from 108°F to 110°F. The biological survey was conducted on foot and covered 100% of the study area.

All native and naturalized plant species encountered within the survey area were identified and recorded. The potential for special-status plant and wildlife species to occur within the project was evaluated based on the observed vegetation communities, soils present, elevation, and surrounding landscape features. Vegetation communities and land covers were mapped directly in the field. An informal evaluation of potential jurisdictional waters regulated under the federal Clean Water Act, California Fish and Game Code, and Porter-Cologne Water Quality Act was also conducted concurrently with the biological reconnaissance.

Latin and common names for plant species with a California Rare Plant Rank follow the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2024). For plant species without a California Rare Plant Rank, Latin names follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2024), and common names follow the U.S. Department of Agriculture's Natural Resources Conservation Service Plants Database (USDA 2024). Vegetation mapping was conducted in accordance with the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) or the Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). Latin and common names of animals follow Crother (2017) for reptiles and amphibians, the American Ornithologists' Union (AOU 2021) for birds, the Mammal Diversity Database (ASM 2021) for mammals, the North American Butterfly Association (NABA 2020) for butterflies, and Moyle (2002) for fish.

Dudek used geographic information system (ArcGIS) software to map biological resources and prepare associated illustrative figures.

4.3 Survey Limitations

Vegetation mapping was conducted during the day and during months of the year when most perennials would have been evident or identifiable. Notes were taken for incidental wildlife observations made during the survey to establish a general baseline of wildlife diversity within the study area. The current survey effort provides an accurate representation of the potential for special-status species to occur in the study area. The on-site investigation was thorough and comprehensive, and the results of the study contained herein provide a reasonable, accurate assessment of the study area.

5. Biological Resources

5.1 Existing Conditions

The study area consists of previously graded, vacant relatively flat land at an elevation range between approximately 4 feet to 10 feet above mean sea level. Two ornamental trees are located along the northern boundary of the project site, and a chain-link fence separates the project site from an existing temporary campus building immediately west. The project site consists of developed land characterized by maintained grass with scattered ornamental trees and shrubs. The surrounding study area is developed with the Off-Campus Center - Calexico.

5.2 Soils

Based on a review of the U.S. Department of Agriculture Web Soil Survey database, Imperial-Glenbar silty clay loam, wet, 0% to 2% slopes is the only soil present on the study area (USDA 2024). The Imperial and Glenbar soil series are described in detail below. No hydric soils are present on the study area.

Imperial soils are found on nearly level to gently sloping flood plains and in old lakebeds at elevations of 235 feet below sea level to 300 feet above mean sea level. These soils formed in calcareous alluvium from mixed sources. Imperial soils are well and moderately drained with slow or very slow runoff and very slow permeability.

Glenbar soils consists of very deep, well drained soils with moderately slow permeability that formed in stratified stream alluvium from mixed sources. Glenbar soils range from 230 feet below sea level to 2,500 feet above mean sea level.

5.3 Vegetation Communities and Land Covers

The entire study area consists of urban/developed land. Maintained grass and ornamental vegetation in the project site was identified and mapped within the study area as urban/developed land based on general characteristics of mowed, planted grasses and manicured ornamental plantings associated with human activities from the adjacent Off-Campus Center - Calexico. Figure 5, Biological Resources Map, illustrates the distribution of vegetation communities and land covers on the study area.

5.3.1 Urban/Developed Land

Urban/developed land refers to areas that have been constructed on or disturbed so severely that native vegetation is no longer supported. Urban/developed lands includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials. Urban/developed land encompasses the entire project site and surrounding study area buffer. The project site consists of landscaped grasses and ornamental plantings, while the surrounding study area buffer consists of paved public roads and college buildings.

5.4 Floral Diversity

A total of 11 species of vascular plants (1 [9%] native and 10 [91%] non-native) were recorded within the study area. The low plant diversity reflects the study area's small size and its proximity to surrounding urban development. Plant species observed included ornamental trees, ruderal herbaceous species associated with disturbed areas, and maintained grass. A list of plant species observed within the study area is included in Attachment C, Species Compendium.

5.5 Wildlife Diversity

A total of 5 bird species, (1 [20%] native and 4 [80%] non-native), were detected within the study area. No bird nests were observed within the study area. No reptile, mammal, invertebrate, or amphibian species were observed during the field reconnaissance. The low wildlife diversity reflects the study areas lack of native habitat and location within an urban setting. Wildlife species observed within the study area are listed in Attachment C.

5.6 Special-Status Plants

No plant species listed or proposed for listing as rare, threatened, or endangered by either CDFW or the U.S. Fish and Wildlife Service were detected within the study area. The study area is not within any designated federally designated Critical Habitat for any special-status plant species (USFWS 2024c).

Based on the results of the literature review and database searches, 9 special-status plant species have been documented within the region. All these species were evaluated for potential to occur within the study area (Attachment D, Special-Status Plant Species Potential to Occur). Criteria used include soils, current disturbance levels, vegetation communities present, elevation ranges, and previous known locations based on the California Natural Diversity Database (CDFW 2024b), California Native Plant Society (CNPS 2024), and Consortium of California Herbaria (Calflora 2024) records.

None of the 9 special-status plant species known to occur in the region are expected to occur on the study area due to the prevalence of urban/developed habitat and absence of suitable soils or native vegetation communities.

5.7 Special-Status Wildlife

No wildlife species listed or proposed for listing as rare, threatened, or endangered by either CDFW or the U.S. Fish and Wildlife Service were detected within the study area. The study area is not within any federally designated Critical Habitat for any special-status wildlife species (USFWS 2024c).

Based on the results of the literature review and database searches, 15 special-status species have been documented within the region (Attachment E, Special-Status Wildlife Species Potential to Occur). For each species listed, a determination was made regarding potential use of the study area based on information gathered during the field reconnaissance, known habitat preferences, and range of the species' relative distributions in the area.

Due to the limited size of the study area, location in an urban/developed setting, and absence of native habitat, none of the 15 special-status wildlife species documented in the region have a moderate or high potential to occur.

However, one CDFW Species of Special Concern, western mastiff bat (*Eumops perotis californicus*), has a low potential to roost and forage within the ornamental trees on the study area. In addition, one native raptor species, American kestrel (*Falco sparverius*), was detected foraging in the study area. Other bird species detected were non-native and are associated with urban areas. Due to the presence of ornamental trees and avian species detected during the field reconnaissance, the study area has the potential to support nesting bird species which are protected under the Migratory Bird Treaty Act. Potential impacts to special-status species from project implementation are discussed in Section 6.2 below.

5.8 Jurisdictional Aquatic Resources

Based on a preliminary evaluation of potentially jurisdictional waters on the study area conducted during the field reconnaissance, no areas potentially supporting vernal pools, ephemeral ponds, or wetlands were observed during the survey. No riparian habitat was observed on the study area, and as such, no potentially jurisdictional aquatic resources are present on the project.

6 Impact Analysis and Conclusions

6.1 Thresholds of Significance

The thresholds of significance used to evaluate the impacts of the proposed project related to biological resources are based on Section IV Biological Resources of Appendix G of the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter. 3, sections 15000-15387). A significant impact under CEQA would occur if the proposed project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

6.2 Impact Analysis

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Potential impacts of the Campus Master Plan related to species listed as candidate, sensitive, or special status were evaluated in Section 3.4, Biological Resources, of the certified 2003 EIR. Based on the current analysis, the study area contains ornamental trees, shrubs, and maintained grass that would potentially be used by migratory birds for breeding and nesting. Direct impacts to migratory nesting birds must be avoided to comply with the MBTA and California Fish and Game Code. Indirect impacts to nesting birds from short-term, construction-related noise could result in decreased reproductive success or abandonment of an area as nesting habitat if construction were conducted during the breeding/nesting season (i.e., February through September). In general, due to the developed and disturbed conditions of the site and surrounding areas (i.e., no natural habitat areas or preserves), the potential for biological resources to occur is low. However, direct and indirect impacts to nesting birds would be significant absent mitigation. Implementation of recommended **Mitigation Measure (MM) BIO-1** (see below) would ensure nesting birds would not be impacted by project construction activities during nesting season.

In addition, ornamental trees on the study area have a limited potential to support nesting and foraging for western mastiff bat, a CDFW Species of Special Concern. Potential impacts of the Campus Master Plan related to species listed as candidate, sensitive, or special status were evaluated in Section 3.4, Biological Resources, of the certified 2003 EIR. In general, due to the developed and disturbed conditions of the site and surrounding areas (i.e., no natural habitat areas or preserves), the potential for western mastiff bat to roost is extremely low, but it may still use ornamental trees or buildings in the study area; the limited amount of ornamental trees forage is low. However, direct impacts to special-status species are considered significant absent mitigation. The western mastiff bat reproduces in California from April through September, which coincides with the avian nesting season. It forages at night throughout the year. As such, implementation of **MM-BIO-1** would also ensure western mastiff bat would not be impacted by project construction activities as any potential bat roosts in trees or buildings would also be surveyed for potential avian nests during the pre-construction survey.

Therefore, potential impacts to biological resources would be **less than significant with mitigation incorporated**.

MM-BIO-1: Pre-Construction Nesting Bird and Special-Status Bat Survey. If ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season (February 1–September-30) and bat reproduction season (April-September), CSU/SDSU, or its designee, shall retain a biologist to conduct a pre-construction nesting bird survey within the area to be disturbed and a 500-foot buffer. Surveys shall be conducted within 3 days prior to initiation of ground-disturbing activity between dawn and noon.

If construction begins outside the nesting bird season (i.e., between October 1 and January 31), work may proceed without a nesting bird survey. If construction begins outside the nesting season, but crosses into the nesting season (i.e., start in January but work does not start until March), construction activities may proceed without a nesting

bird survey. However, anytime construction activities pause for more than 72 hours during the nesting season, an updated nesting bird survey by a biologist shall be conducted prior to the resumption of construction activities.

If an active nest or western mastiff bat roost is detected during the pre-construction survey, avoidance buffers shall be implemented as determined by a biologist retained by CSU/SDSU. The buffer shall be of sufficient distance to ensure avoidance of adverse effects to the nesting bird or bat by accounting for topography, ambient conditions, species, nest/roost location, and activity type. All nests shall be monitored as determined by the biologist until nestlings have fledged and dispersed, or it is confirmed that the nest has been unsuccessful or abandoned. Any trees observed supporting roosting bats during the pre-construction survey shall not be removed during the bat reproduction period of April-September. Avoidance buffers shall be implemented as determined by a biologist retained by CSU/SDSU.

- b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

The 2003 Initial Study (IS) prepared for the Campus Master Plan EIR determined that no impact related to adverse effects on riparian habitat or other sensitive natural communities would occur.

The study area does not contain riparian vegetation communities or any native vegetation communities including those identified as sensitive according to CDFW. As a result, **no impacts** to sensitive communities are expected to occur.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

The IS prepared for the Campus Master Plan 2003 EIR determined that no impact related to adverse effects on wetlands would occur.

The project site does not contain wetland waters of the United States or state. As such, **no impacts** to protected wetlands are expected to occur.

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

The IS prepared for the Campus Master Plan 2003 EIR determined that no impact related to wildlife movement or migration would occur.

The project is not located within an area that functions as a wildlife movement or migration corridor, and occurs in an urban setting that lacks native habitat. As such, the proposed project would not constrain natural wildlife movement in its vicinity and **no impacts** would occur.

e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

The IS prepared for the Campus Master Plan 2003 EIR determined that no impact related to conflicts with local biological resources policies or ordinances would occur.

As a state entity, CSU/SDSU is not subject to local government plans, policies, regulations, and guidelines, such as those contained in the city of Calexico General Plan. As such, the project would not conflict with any local policies or ordinances protecting biological resources. Therefore, **no impacts** would occur to any biological resources protected by a local ordinance.

f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

The IS prepared for the Campus Master Plan 2003 EIR determined that no impact related to conflicts with local habitat conservation plans.

There are no habitat conservation or natural community plans that have been implemented for the project area. The Imperial Irrigation District developed a planning agreement in 2006 for a regional HCP, however that plan is still in development and has not been implemented (CDFW 2006). As such, the project would not conflict with any applicable plans and **no impacts** would occur.

7 References

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MEMORANDUM

SUBJECT: SDSU IMPERIAL VALLEY OFF-CAMPUS CENTER - CALEXICO, AFFORDABLE STUDENT HOUSING PROJECT - BIOLOGICAL RESOURCES TECHNICAL MEMORANDUM

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MEMORANDUM

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BIOLOGICAL RESOURCES TECHNICAL MEMORANDUM

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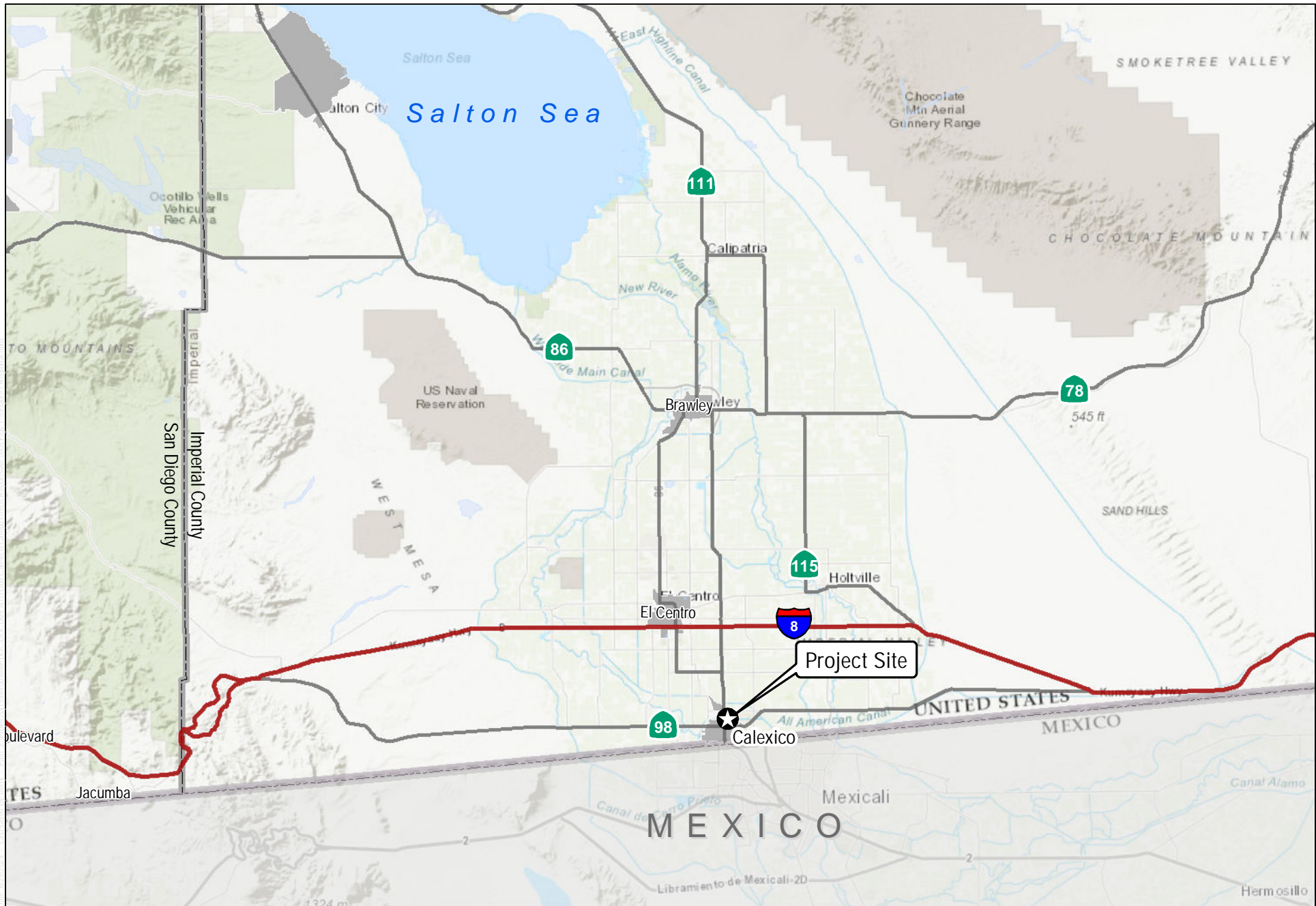
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Attachment A

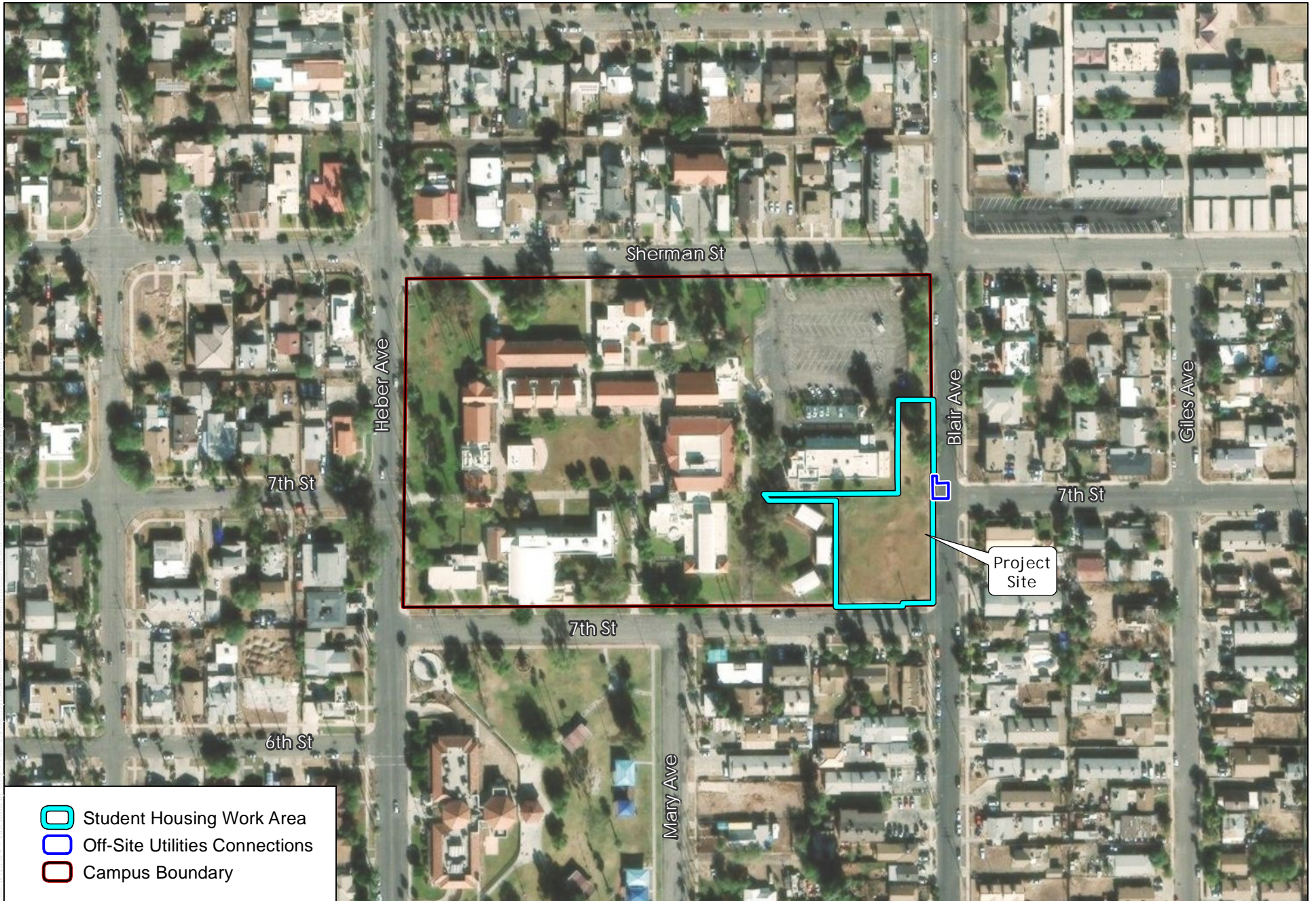
Figures



SOURCE: ESRI



FIGURE 1
Regional Map

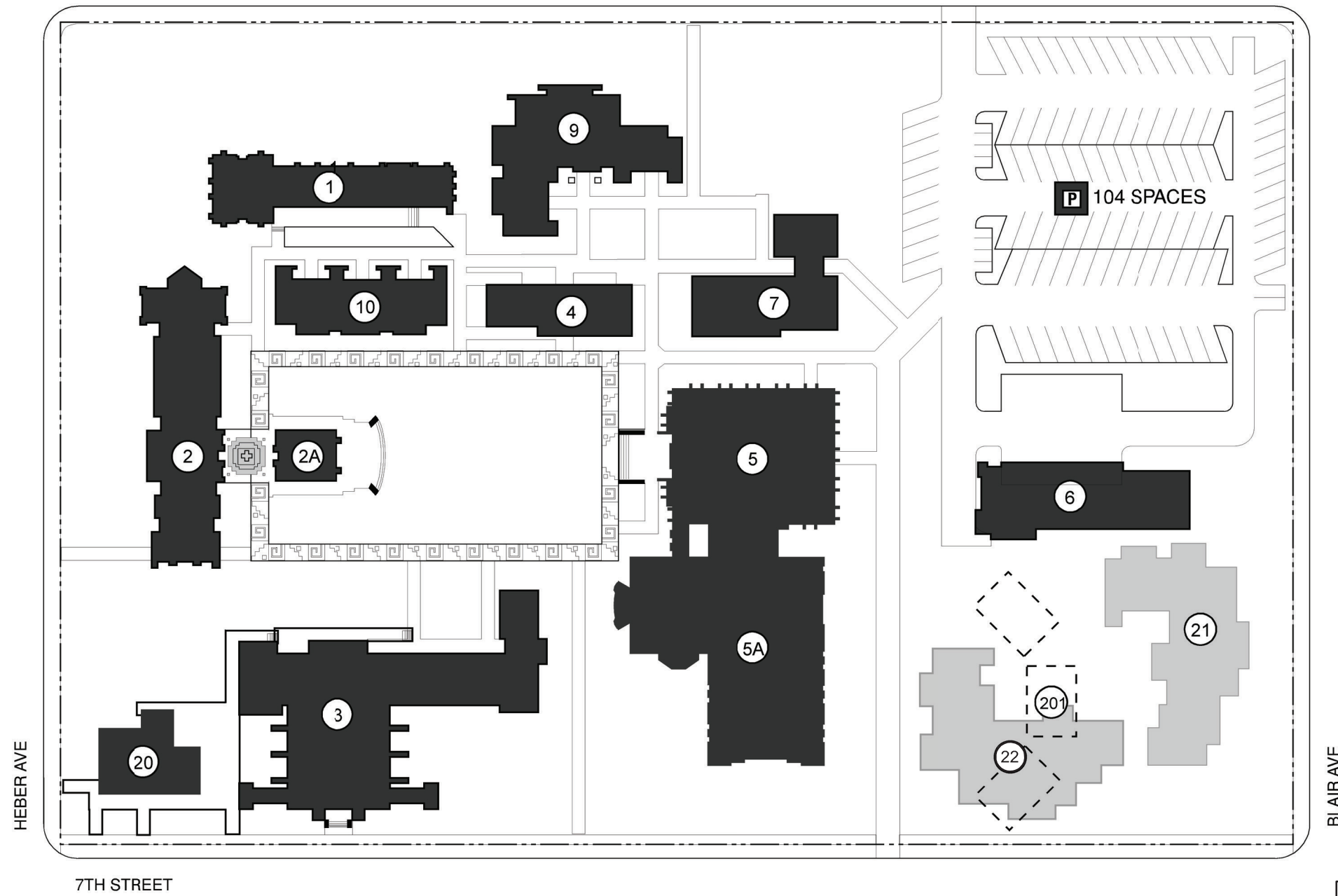


SOURCE: AERIAL-ESRI MAPPING SERVICE 2023; DEVELOPMENT-SDSU 2024



FIGURE 2
Vicinity Map

SHERMAN STREET



SDSU-IVC BUILDING LEGEND

- 1. North Classroom
- 2. Administration
- 2A. Art Gallery
- 3. Auditorium
- 4. Classrooms
- 5. Library
- 5A. Library Addition
- 6. Physical Plant
- 7. Computer Building/Campus Store
- 8. Student Affairs
- 9. Faculty Offices East
- 10. Faculty Offices West
- 20. Student Center
- 21. Classroom Building/Classroom Building East
- 22. Classroom Building South
- 201. Temporary Buildings

San Diego State University

Imperial Valley Campus - Calexico
 Campus Master Plan
 Master Plan Enrollment: 850 FTE
 Approval Date: February 1980
 Revised Date: September 2003
 Main Campus Acreage: 8.4



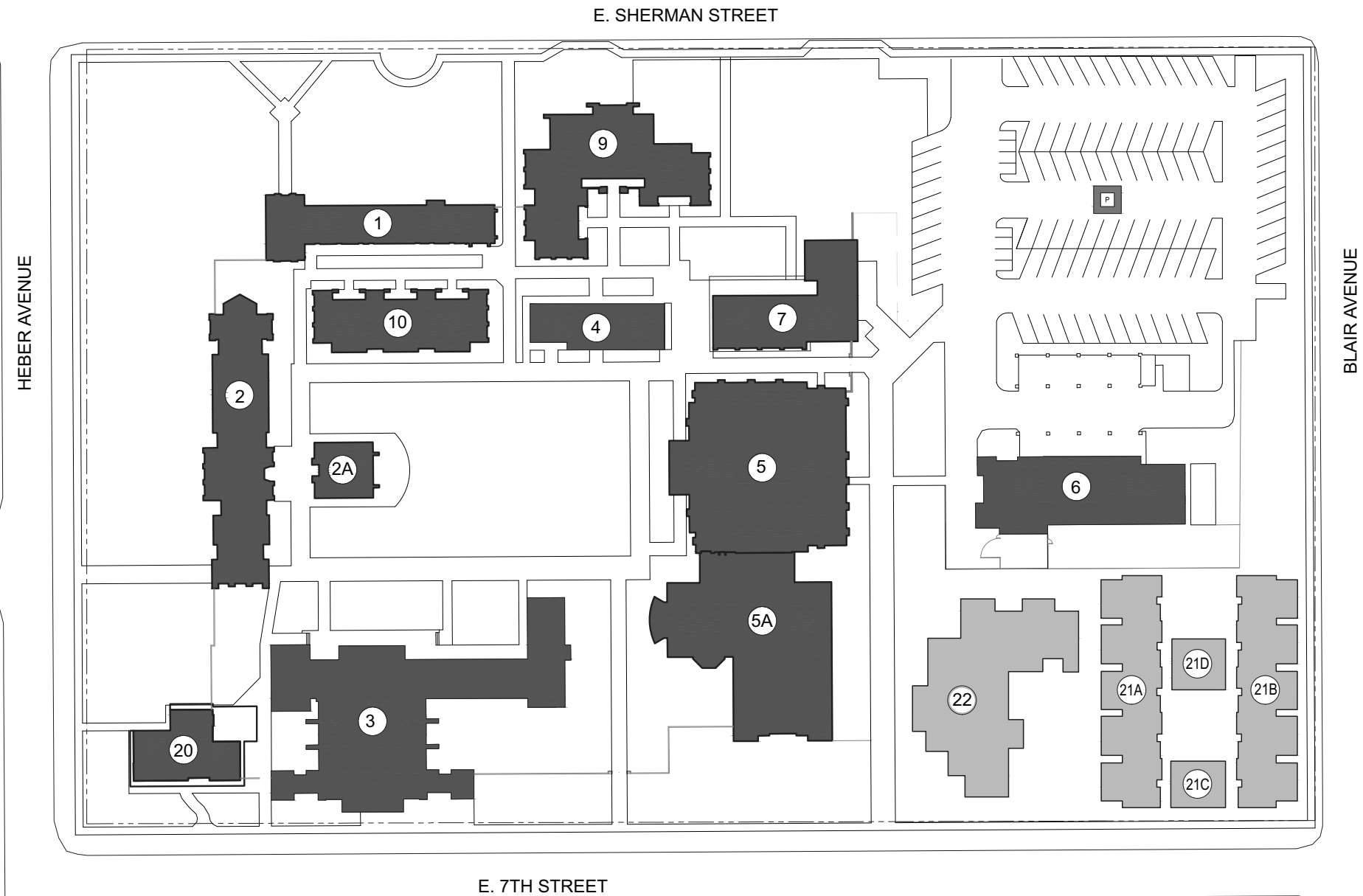
Buildings	Campus Boundary	Parking
EXISTING BUILDING	EXISTING	EXISTING LOT
FUTURE BUILDING	FUTURE	FUTURE LOT
TEMPORARY BUILDING		EXISTING STRUCTURE
EXISTING BUILDING NOT IN USE		FUTURE STRUCTURE

SOURCE: SDSU 2003

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FIGURE 3A

Existing Campus Master Plan

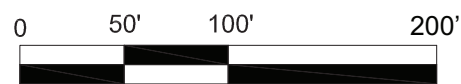
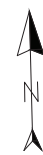


SDSU-IVC BUILDING LEGEND

- 1. North Classroom
- 2. Administration
- 2A. Art Gallery
- 3. Auditorium
- 4. Classrooms
- 5. Library
- 5A. Library Addition
- 6. Physical Plant
- 7. Computer Building/Campus Store
- 8. Student Affairs
- 9. Faculty Offices East
- 10. Faculty Offices West
- 20. Student Center
- 21A. Student Housing West
- 21B. Student Housing East
- 21C. Student Housing Office
- 21D. Student Housing Community Center
- 22. Classroom Building South

**PROPOSED
San Diego State University**

Imperial Valley Campus - Calexico
 Campus Master Plan
 Master Plan Enrollment: 850 FTE
 Approval Date: 1980
 Revised Date: September 2003
 Main Campus Acreage: 8.4



Buildings	Campus Boundary	Parking
EXISTING BUILDING	EXISTING	EXISTING LOT
FUTURE BUILDING	FUTURE	FUTURE LOT
TEMPORARY BUILDING		EXISTING STRUCTURE
EXISTING BUILDING NOT IN USE		FUTURE STRUCTURE

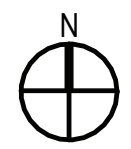
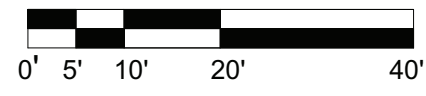
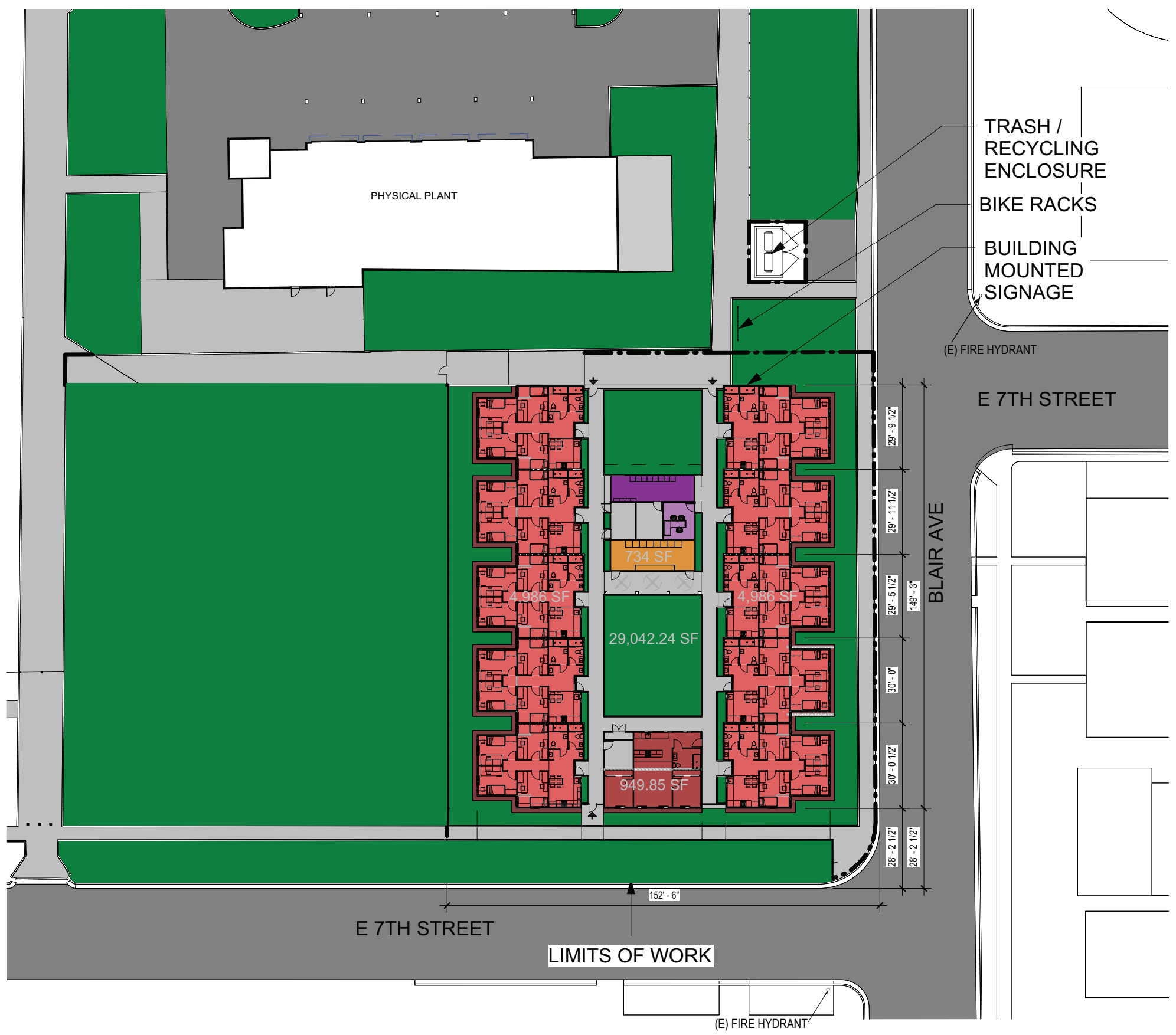
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SOURCE: SDSU 2024

FIGURE 3B
 Proposed Campus Master Plan

LEGEND

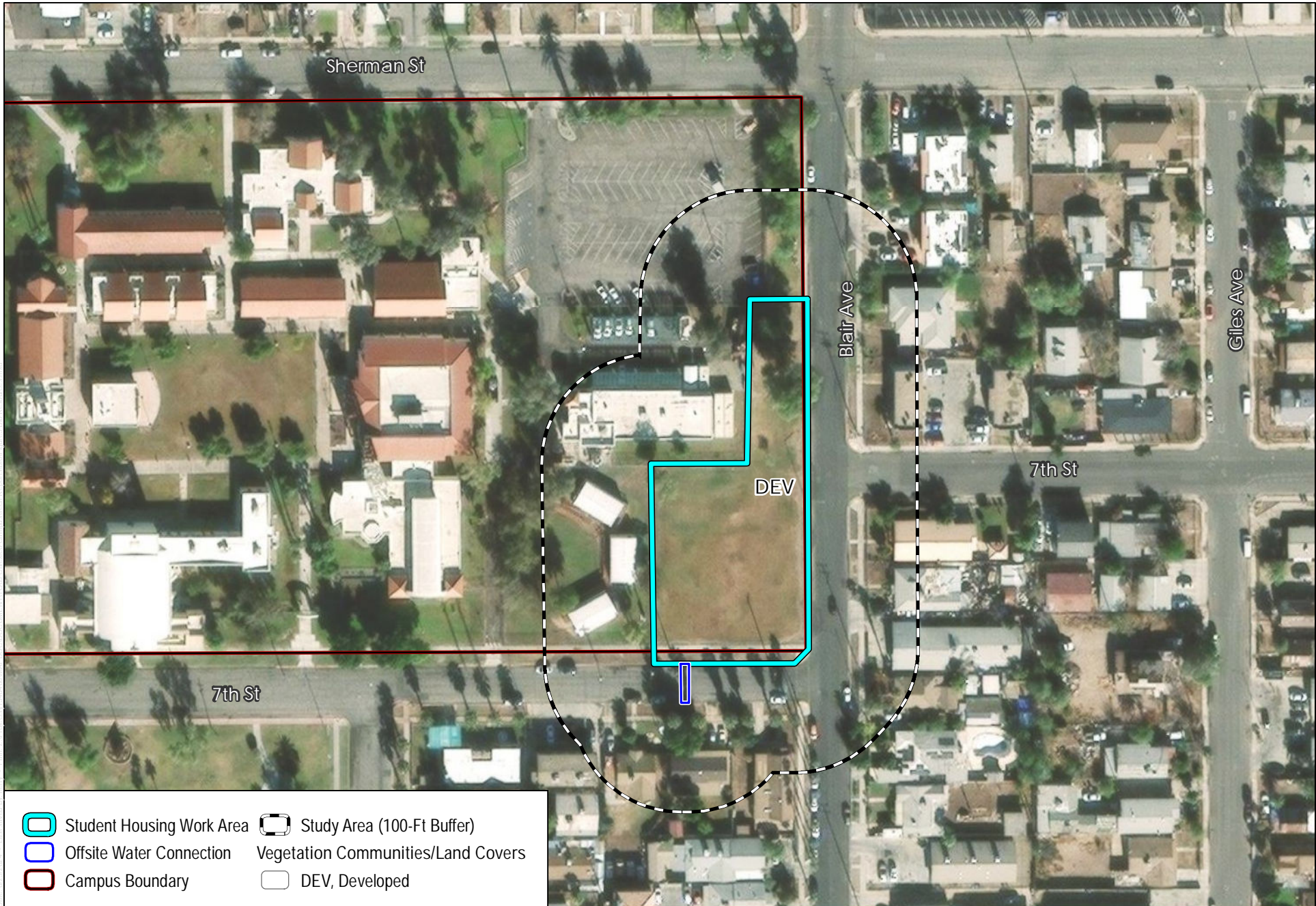
- BEDROOM
- LAUNDRY
- LIVE-IN APARTMENT
- LOBBY
- MAIL/UPS
- SERVICE



SOURCE: SDSU 2024

FIGURE 4
Site Plan

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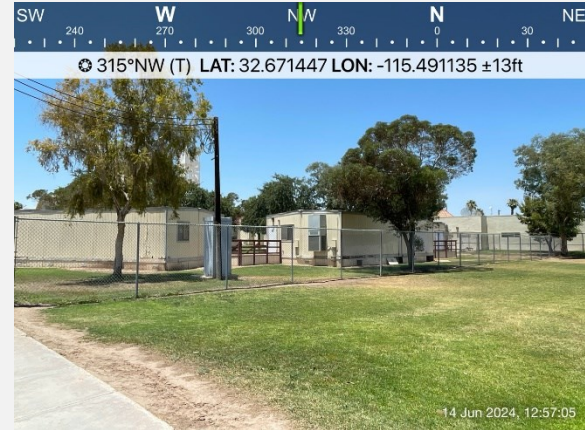
SOURCE: AERIAL-ESRI MAPPING SERVICE 2023; DEVELOPMENT-SDSU 2024

Attachment B

Site Photographs



1. View of the center of the study area, facing north



2. View of the study area, facing west



3. Northern portion of the study area, facing south along Blair Avenue



4. Northern portion of the study area, along Blair Avenue

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Attachment C

Species Compendium

Plant Species

Angiosperms (Dicots)

AMARANTHACEAE – AMARANTH FAMILY

- * *Salsola tragus* – prickly Russian thistle

ASTERACEAE – SUNFLOWER FAMILY

- * *Erigeron bonariensis* – asthma weed, flax-leaved horseweed

EUPHORBIACEAE – SPURGE FAMILY

- * *Euphorbia serpyllifolia* – thymeleaf sandmat

FABACEAE – LEGUME FAMILY

- * *Parkinsonia aculeata* – Jerusalem thorn

MORACEAE – FIG FAMILY

- * *Ficus macrocarpa* – curtain fig

MYRTACEAE – MYRTLE FAMILY

- * *Eucalyptus camaldulensis* – river red gum
- * *Eucalyptus globulus* – Tasmanian blue gum

OLEACEAE – OLIVE FAMILY

- * *Olea europaea* – European olive

Gymnosperms (Monocots)

ARECACEAE – PALM FAMILY

- Washingtonia filifera* – California fan palm

PINACEAE – PINE FAMILY

- * *Pinus* spp. – ornamental pine species

POACEAE – GRASS FAMILY

- * *Schismus barbatus* – Mediterranean grass

Wildlife Species – Vertebrates

Birds

COLUMBIDAE – PIGEONS AND DOVES

- * *Columba livia* – rock pigeon
- * *Streptopelia decaocto* – Eurasian collared-dove

FALCONIDAE – FALCONS

Falco sparverius – American kestrel

PSITTACIDAE – PARROTS

- * *Myiopsitta monachus* – monk parakeet

STURNIDAE – STARLINGS

- * *Sturnus vulgaris* – European starling

- * signifies introduced (non-native) species

Attachment D

Special-Status Plant Species Potential to Occur

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Abronia villosa</i> var. <i>aurita</i>	chaparral sand- verbena	None/None/1B.1	Chaparral, coastal scrub, desert dunes; sandy/annual herb/(Jan) Mar-Sep/ 245-5,250	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Amaranthus</i> <i>watsonii</i>	Watson's amaranth	None/None/4.3	Mojavean desert scrub, Sonoran desert scrub/annual herb/Apr-Sep/65-5,580	Not expected to occur. No suitable vegetation present.
<i>Astragalus</i> <i>sabulonum</i>	gravel milk- vetch	None/None/2B.2	Desert dunes, Mojavean desert scrub, Sonoran desert scrub; flats, gravelly (sometimes), roadsides, sandy (usually), washes/annual/perennial herb/ Feb-June/95-3,050	Not expected to occur. No suitable vegetation present.
<i>Euphorbia</i> <i>abramsiana</i>	Abrams' spurge	None/None/2B.2	Mojavean desert scrub, Sonoran desert scrub; sandy/annual herb/(Aug)Sep-Nov/-15-4,300	Not expected to occur. No suitable vegetation present.
<i>Imperata</i> <i>brevifolia</i>	California satintail	None/None/2B.1	Chaparral, coastal scrub, meadows, and seeps (often alkali), Mojavean desert scrub, riparian scrub; mesic/perennial rhizomatous herb/Sep-May/0-3,985	Not expected to occur. No suitable vegetation present.
<i>Johnstonella</i> <i>costata</i>	ribbed cryptantha	None/None/4.3	Desert dunes, Mojavean desert scrub, Sonoran desert scrub; Sandy/annual herb/Feb-May/195-1,640	Not expected to occur. No suitable vegetation present.
<i>Johnstonella</i> <i>holoptera</i>	winged cryptantha	None/None/4.3	Mojavean desert scrub, Sonoran desert scrub/annual herb/Mar-Apr/330-5,545	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Mentzelia</i> <i>hirsutissima</i>	hairy stickleaf	None/None/2B.3	Sonoran desert scrub (rocky)/annual herb/Mar-May/0-2,295	Not expected to occur. No suitable vegetation present.
<i>Pholisma</i> <i>sonorae</i>	sand food	None/None/1B.2	Desert dunes, Sonoran desert scrub (sandy)/perennial herb (parasitic)/ (Mar) Apr-June/0-655	Not expected to occur. No suitable vegetation present.

Status Legend:**CRPR: California Rare Plant Rank**

1B: Plants rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California but more common elsewhere

4: Watch List: Plants of limited distribution

Threat Rank

- .1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
- .2 Moderately threatened in California (20–80% occurrences threatened / moderate degree and immediacy of threat)
- .3 Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Attachment E

Special-Status Wildlife Species Potential to Occur

Scientific Name	Common Name	Status (Federal/State)	Habitat	Potential to Occur
Amphibians				
<i>Incilius alvarius</i>	Sonoran desert toad	None/SSC	Desert and semi-arid habitats including desert scrub, semi-arid grasslands and woodlands; usually associated with large permanent streams	Not expected to occur. No suitable vegetation present.
<i>Lithobates pipiens</i> (native populations only)	northern leopard frog	None/SSC	Adjacent to permanent and semi-permanent water in a range of habitats	Not expected to occur. No suitable vegetation present.
Reptiles				
<i>Kinosternon sonoriense</i>	Sonoran mud turtle	None/SSC	Desert ponds, slow-moving shaded streams and rivers, and cattle tanks; usually in woodlands and occasionally grasslands	Not expected to occur. No suitable vegetation present.
<i>Phrynosoma mcallii</i>	flat-tailed horned lizard	None/SSC	Desert washes and flats with sparse low-diversity vegetation cover and sandy soils	Not expected to occur. No suitable vegetation present.
Birds				
<i>Athene cunicularia</i> (burrow sites and some wintering sites)	burrowing owl	BCC/SSC	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	Not expected to occur. No suitable vegetation present.
<i>Buteo regalis</i> (wintering)	ferruginous hawk	None/WL	Winters and forages in open, dry country, grasslands, open fields, agriculture	Not expected to occur. No suitable vegetation present. Grassland on site is maintained and site is in an urban area.
<i>Pyrocephalus rubinus</i> (nesting)	vermillion flycatcher	None/SSC	Nests in riparian woodlands, riparian scrub, and freshwater marshes; typical desert riparian with cottonwood, willow, mesquite adjacent to irrigated fields, ditches, or pastures	Not expected to occur. No suitable vegetation present.
<i>Rallus obsoletus yumanensis</i>	Yuma Ridgway's rail	FE/FP, ST	Freshwater marsh dominated by <i>Typha</i> spp., <i>Scirpus</i> spp., <i>Schoenoplectus</i> spp., and <i>Bolboschoenus</i> spp.; mix of riparian tree and	Not expected to occur. No suitable vegetation present.

Scientific Name	Common Name	Status (Federal/State)	Habitat	Potential to Occur
			shrub species along the marsh edge; many occupied areas are now man-made, such as managed ponds or effluent-supported marshes	
<i>Setophaga petechia</i> (nesting)	yellow warbler	None/SSC	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	Not expected to occur. No suitable vegetation present.
Mammals				
<i>Dasypterus xanthinus</i>	western yellow bat	None/SSC	Valley-foothill riparian, desert riparian, desert wash, and palm oasis habitats; below 2,000 feet above mean sea level; roosts in riparian and palms	Not expected to occur. No suitable vegetation present.
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	Low potential to occur. Limited ornamental trees on site can provide roosting and foraging habitat.
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	None/SSC	Pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oases; roosts in high cliffs or rock outcrops with drop-offs, caverns, and buildings	Not expected to occur. No suitable foraging or roosting habitat present.
<i>Nyctinomops macrotis</i>	big free-tailed bat	None/SSC	Rocky areas; roosts in caves, holes in trees, buildings, and crevices on cliffs and rocky outcrops; forages over water	Not expected to occur. No suitable foraging or roosting habitat present.
<i>Sigmodon hispidus eremicus</i>	Yuma hispid cotton rat	None/SSC	Backwater sloughs, marshy areas adjacent to Colorado River	Not expected to occur. No suitable vegetation present.
<i>Taxidea taxus</i>	American badger	None/SSC	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils	Not expected to occur. No suitable vegetation present. Grassland on site is maintained and site is in an urban area.

Status Legend**Federal**

BCC: U.S. Fish and Wildlife Service Bird of Conservation Concern

FE: Federally listed as endangered

State

FP: California Fully Protected Species

SSC: California Species of Special Concern

ST: State listed as threatened

WL: California Watch List Species

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