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Subject: Biological Resources Assessment Memorandum for the Cox and Mulberry Site – Water Mill Homes Project, City of San Marcos, San Diego County, California

Dear Ms. Mitchell,

Rincon Consultants, Inc. (Rincon) is pleased to submit this Biological Resources Assessment Memorandum (BRAM) to support the Cox and Mulberry Site – Water Mill Homes Project (project). The assessment was completed to document existing site conditions and evaluate potential impacts to special-status biological resources as required under the California Environmental Quality Act (CEQA). The City of San Marcos (City) is the lead agency reviewing under CEQA.

Project Description and Location

The project site is located on the southwest corner of the Cox Road and Mulberry Drive intersection in the city of San Marcos, San Diego County, California. The project proposes to develop the 10.06-acre site, that encompasses Assessor's Parcel Number 182-131-14-00, for a residential subdivision with nine (9) single-family homes. Refer to Figure 1 and Figure 2 for regional and project location, respectively. The project site is located within the boundaries of the San Diego Association of Governments (SANDAG) Final Multiple Habitat Conservation Program (MHCP), and within the Natural Community Conservation Planning (NCCP) subregion, but not within a Focused Planning Area (FPA) or Biological Core and Linkage Area (BCLA) (Figure 3).

The project site is vacant with a history of disturbance, historically identified as extensive agriculture. It is considered a Farmland of Local Importance, according to the City and California Department of Conservation Division of Land Resource Protection (Farmland Mapping & Monitoring Program, 2008).

Open, disturbed habitat is found throughout the site, with small stands of non-native palm trees and other ornamental vegetative species found in the northeast, east, southeast, and western portions of the project site. Dense weedy, non-native annual and perennial grasses and forbs were documented throughout the site during the initial survey on March 2, 2022. However, recent discing on the project site which removed most of the previously recorded vegetation was observed during a recent site visit on October 14, 2024. Elevation on site ranges from approximately 692 to 718 feet (211 to 219 meters) above mean sea level. Surrounding land uses include residential development to the north, east, south, and west.





















Figure 3 Project Vicinity to MHCP Conservation Areas

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zz-12442 Cox & Mulberry Fig 3 Project Vicinity to MHCP



The San Marcos Creek Conservation Easement, identified as Sycamore Twin Oaks, is approximately 0.25 mile to the west of the project site at the intersection of Cox Road and Sycamore Drive and is managed by the San Diego Habitat Conservancy. Barbed wire is currently installed on all sides of the project site.

Methodology

Regulatory Overview

Regulated or special-status resources studied and analyzed herein include special-status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. For this report, potential impacts to biological resources were analyzed based on the following statutes:

Federal

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

State

- CEQA
- California Endangered Species Act (CESA)
- California Fish and Game Code (CFGC)
- Native Plant Protection Act (NPPA)
- Porter-Cologne Water Quality Control Act (PCWQCA)

Local

- SANDAG Final MHCP Volume I and II
- City General Plan (2013)
- City Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (Subarea Plan)

Multiple Habitat Conservation Program

The MHCP is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in northwestern San Diego County. The MHCP covers the cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. Its goal is to conserve approximately 19,000 acres of habitat, of which roughly 8,800 acres (46 percent) are already in public ownership and contribute toward the habitat preserve system for the protection of rare, threatened, or endangered species (AMEC Earth & Environmental, Inc. [AMEC] et al. 2003a, 2003b).

The MHCP Subregional Plan and Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) were adopted and certified by the SANDAG Board of Directors on March 28, 2003. A Subarea Plan for the City has been prepared, but it must be adopted by the City and implementing agreements



with the California Department of Fish and Wildlife (CDFW) and United States (U.S.) Fish and Wildlife Service (USFWS) must be signed before incidental take permits can be issued.

FOCUS PLANNING AREAS

The MHCP identifies a series of FPAs within which some lands will be dedicated for preservation of native habitats. These areas contain both "hard line" areas, which will be preserved as open space, and "soft line" areas, which will include both development and open space to be determined through the planning process (AMEC et al. 2003a, 2003b). Several objectives were incorporated into the process of designing the MHCP FPAs:

- Conserve as much of the most biologically important habitat lands remaining in the subregion as
 possible, in a system that minimizes preserve fragmentation
- Maximize the inclusion of public lands within the preserve
- Maximize the inclusion of lands already conserved as open space, where appropriate
- Maintain individual property rights and economic viability for the subregion (AMEC et al. 2003a, 2003b)

BIOLOGICAL CORE AND LINKAGE AREAS

The MHCP identifies BCLAs as those areas determined biologically valuable for inclusion in the regional preserve system (AMEC et al. 2003a, 2003b). BCLAs were designed to conserve sensitive species and corridors between areas of high-quality habitat and to provide avenues for wildlife movement between these areas.

COVERED SPECIES

A covered species is one for which take authorization would be provided under the MHCP because longterm viability was determined to be adequately maintained under a particular preserve system design. The federal action addressed in the MHCP is the issuance of incidental take permits for all species on the Covered Species list whether they currently are listed or will be in the future. The MHCP covered species includes 20 plant species and 30 wildlife species.

City of San Marcos Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan

The City Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (hereafter, Draft Subarea Plan) comprehensively addresses how the City will conserve natural biotic communities and sensitive plant and wildlife species. The Draft Subarea Plan has been prepared in response to direction from the USFWS and the CDFW to meet the applicable requirements of the federal and State ESAs and the Natural Community Conservation Planning Act of 1992. The City's Draft Subarea Plan is not formally approved and adopted, so all projects are required to obtain applicable permits for impacts to listed species as per Section 10 or Section 7 of the ESA and CESA. Also, because the City does not have an approved Subarea Plan, the mitigation requirements for impacts to the biological resources are based on ratios provided by the approved MHCP (AMEC et al. 2003a, 2003b). Although the Draft Subarea Plan has not yet been approved, the City has used the plan as a guide for open space design and preservation.



City of San Marcos General Plan

The Conservation and Open Space Element of the 2013 San Marcos General Plan contains several policies pertaining to the protection of biological resources (City of San Marcos 2013). The following goals and policies apply to the project:

- Goal COS-1: Identify, protect, and enhance significant ecological and biological resources within San Marcos and its adaptive Sphere of Influence.
 - Policy COS-1.1: Support the protection of biological resources through the establishment, restoration, and conservation of high-quality habitat areas
 - Policy COS-1.2: Ensure that new development, including Capital Improvement Projects, maintain the biotic habitat value of riparian areas, oak woodlands, habitat linkages, and other sensitive biological habitats
- Goal COS-2: The City is committed to conserving, protecting, and maintaining open space, agricultural, and limited resources for future generations. By working with property owners, local organizations, and state and federal agencies, the City can limit the conversion of resource lands to urban uses.
 - Policy COS-2.1: Provide and protect open space areas throughout the City for its recreational, agricultural, safety, and environmental value
 - Policy COS-2.2: Limit, to the extent feasible, the conversion of open space to urban uses and place a high priority on acquiring and preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, water and agricultural resources protection, and overall community benefit
 - Policy COS-2.6: Preserve healthy mature trees where feasible; where removal is necessary, trees shall be replaced at a ratio of 1:1

Guidelines for Determining CEQA Significance

The following threshold criteria, as defined by the CEQA Guidelines Appendix G Initial Study Checklist, were used to evaluate potential environmental effects. Based on these criteria, the proposed project would have a significant effect on biological resources if it would:

- a) Have substantial adverse effects, 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.
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- *e)* Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.



f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

Literature Review

Prior to conducting the biological field survey, Rincon reviewed the parcel (provided by the client), aerial photographs, and previous historical land use of the project site. Queries of the CDFW California Natural Diversity Database (CNDDB) (2022a, 2022b) and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (2022) were conducted to obtain comprehensive information regarding state and federally listed species as well as other special-status species considered to have potential to occur within a five (5)-mile radius of the project site. For CNPS query purposes, a nine (9)-quadrangle search area centered on the project site was used; species with elevation ranges exceeding that of the project site were excluded, and plant species with a California Rare Plant Rank (CRPR) of 3 and 4 were excluded.

In addition, information regarding regionally occurring special-status biological resources related to the site was reviewed using from the following sources:

- USFWS Critical Habitat Portal (USFWS 2022a)
- Biogeographic Information and Observation System (BIOS) (CDFW 2022b)
- Special Animals List (CDFW 2022c)
- Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2022d)
- National Hydrography Dataset (U.S. Geological Survey 2022b)
- USFWS National Wetland Inventory (NWI) Mapper (USFWS 2022c)
- U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA NRCS 2022)
- MHCP for the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista Volume I and II (AMEC et al. 2003a, 2003b)
- SANDAG Parcel Lookup Tool was reviewed to determine areas designated in the MHCP Subarea Plan (SANDAG 2020)
- SanGIS geographic information system data regarding biological resources was reviewed (SanGIS 2020)
- Natural Community Conservation Plan for the City (City of San Marcos 2001)
- The City General Plan (City of San Marcos 2013)

Vegetation Communities

Vegetation classification was based on the classification systems provided in the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008) to provide consistency with the SANDAG MHCP; and modified as appropriate to reflect the existing site conditions. Where applicable, vegetation communities were further classified using *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009) to better identify the species composition and provide consistency with CDFW classifications. Sensitive vegetation community ranking is based on MHCP habitat groups (SANDAG 2003). The MHCP designates six habitat group categories:

• Group A. Wetland Communities



- Group B. Rare Upland
- Group C. Coastal Sage Scrub
- Group D. Chaparral
- Group E. Annual Grassland
- Group F. Other

Flora

All plant species observed in the study area, defined as the project site plus an additional 250-foot buffer, were noted, and plants that could not be identified in the field were identified later using taxonomic keys (Baldwin et al. 2012). The reconnaissance survey included a directed search for special-status plants that would have been apparent at the time of the survey.

Fauna

Animal species observed directly or detected from calls, tracks, scat, nests, or other sign were documented. Zoological nomenclature for birds is in accordance with the *Cornell Lab of Ornithology* (Cornell University 2020); for mammals using *Mammals of California* (Wilson and Reeder 2005); and for amphibians and reptiles using Society for the *Study of Amphibians and Reptiles'* (SSAR) Checklist of the Standard English & Scientific Names of Amphibians & Reptiles (SSAR 2017).

Survey Limitations

The potential presence of special-status species is based on the literature review and field survey that intended to assess general habitat suitability within the study area only. Definitive surveys to confirm the presence or absence of special-status species were not performed and are not included in this BRAM. The findings and opinions included in this BRAM are based exclusively on the above methodology. The survey was conducted outside of the typical blooming period for several common and special-status plant species. As the survey was performed during the day, identification of nocturnal animals was limited to detected sign if present on site.

Special-Status Biological Resources

Local, state, and federal agencies regulate special-status species and other sensitive biological resources and may require an assessment of their presence or potential presence to be conducted prior to the approval of proposed development on a property. This section discusses sensitive biological resources observed in the study area and evaluates the potential for the study area to support additional sensitive biological resources. Assessments for the potential occurrence of special-status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB, species occurrence records from other sites in the vicinity of the study area, previous reports for the study area, and the results of surveys of the study area. The potential for each special-status species to occur in the study area was evaluated according to the following criteria:

No Potential. Habitat on and adjacent to the study area is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, study area history, disturbance regime); for plants, the species has no recorded occurrences within five (5) miles of the study area indicating that the study area may be outside of the range of the species (e.g., the species is known from Coastal Sage Scrub, but only along the coastal margin); or, the

species is conspicuous and would have certainly been identified on site if present (e.g., oak [*Quercus* spp.] trees). Protocol surveys (if conducted) did not detect species.

- Low Potential. The species is not likely to be found on the study area. Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the study area is unsuitable or of very poor quality, and/or there are no recent records of the species within five (5) miles of the study area.
- Moderate Potential. Some of the habitat components meeting the species requirements are
 present, and/or only some of the habitat on or adjacent to the study area is unsuitable. A small
 number of extant occurrences and/or known populations of the species are known to occur in the
 regional vicinity of the project site. The species has a moderate probability of being found on the
 study area.
- High Potential. All the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the study area is highly suitable. Many extant occurrences and/or known populations of the species are known to occur in the regional vicinity of the project site. The species has a high probability of being found on the study area.
- Present. Species is observed on the study area or has been recorded (e.g., CNDDB, other reports) on the study area recently (within the last five [5] years).

For the purpose of this BRAM, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS under the ESA; those listed as Threatened, Endangered, or Rare by the CDFW under CESA or the NPPA; those designated as Fully Protected species by the State; those recognized as Species of Special Concern (SSC) or a Watch List (WL) species by the CDFW; Covered Species identified in the MHCP; and regulations and plants occurring on lists 1 and 2 of the CNPS California Rare Plant Rank (CRPR) system per the following definitions:

- **CRPR 1A** = Plants presumed extirpated in California and either rare or extinct elsewhere;
- **CRPR 1B** = Plants rare, threatened, or endangered in California and elsewhere;
- **CRPR 2A** = Plants presumed extirpated in California but common elsewhere;
- **CRPR 2B** = Plants rare, threatened, or endangered in California but more common elsewhere;

Additionally, CNPS assigns the following threat codes:

- 0.1 Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat);
- 0.2 Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat); and
- 0.3 Not very threatened in California (<20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).

Furthermore, biological resources are ranked globally (G) and State-wide (S) 1 through 5 (more critical to less critical with those ranked as G or S 1 through 3 being considered as sensitive).

Results

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This section discusses the results of the site visit, description of site conditions, and an evaluation of the potential for federal and state listed species to occur. A compendium of plant and wildlife species



observed in the study area is included as Attachment 1. Special status species evaluations are included in Attachment 2. Photographs of the study area are included as Attachment 3.

Field Survey

A field reconnaissance survey was conducted by Rincon Biologist Jacob Hargis on March 2, 2022, from 0800 to 1300 to document the existing site conditions and evaluate the potential for presence of sensitive biological resources including special-status plant and wildlife species, sensitive plant communities, potential jurisdictional waters, wildlife corridors and nursery sites, and locally protected resources. Weather conditions during the survey included temperatures of 58 to 78 degrees Fahrenheit, no wind, and sunny and clear skies. The survey consisted of walking meandering transects throughout the study area, where accessible. The biologist visually scanned for special-status species (or sign thereof) and habitats suitable for these species. Binoculars were used to scan those areas otherwise inaccessible by foot, including a 250-foot buffer area and to scan shrubs for the presence of nests. An updated site visit was conducted by Rincon Senior Biologist Jared Reed on October 14, 2024, to assess the current conditions of stormwater drainage infrastructure on the southwest edge of the project site. The biologist visually assessed the feature and took photos to record all observations and current site conditions.

The habitat requirements for each regionally occurring special-status species were assessed and compared to the type and quality of the habitats observed within the study area during the site visit. Vegetation communities observed on site were mapped on a site-specific aerial photograph. All accessible portions of the study area were covered on foot. Vegetation was generally classified using the systems provided in the *Draft Vegetation Communities of San Diego County* (Oberbauer et. al. 2008) and modified using *A Manual of California Vegetation, Second Edition* (MCV) (Sawyer et al. 2009) as necessary to reflect the existing site conditions. The survey was conducted to make an initial determination regarding the presence or absence of terrestrial biological resources including plants, birds, and other wildlife.

Based on the results of the site visit, literature review, and species known to occur regionally, Rincon assessed the potential for the proposed project to impact special-status species within the study area.

Existing Conditions

Soils

Soils on most of the parcel consisted of Wyman Loam. The site has previously been tilled and disced by agricultural practices and affected by disturbance activities. There are three soil types on the project site, as mapped by the NRCS (Figure 4):

Hueroheuro Loam, 2 to Percent Slopes (HrC)

Hueroheuro series consist of very deep moderately drained soils that formed in alluvium derived from sandstone and other sedimentary rocks. These soils are found on old alluvial fans and marine terraces (NRCS 2022).







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Fig 4 Soils



Las Posas Fine Sandy Loam, 9 to 15 Percent Slopes (LpD2)

Las Posas soils are well drained and have medium to rapid run-off and slow permeability. They are found in upland elevations from 200 to 3,000 feet formed in material weathered from basic igneous rock (NRCS 2022).

Wyman Loam, 2 to 5 percent Slopes (WmB)

The Wyman series consists of deep, well drained, moderately slow permeable soils that formed in alluvium from andesitic and basaltic rocks. Wyman soils are on level to strong sloping terraces and found on old stream terraces and alluvial fans (NRCS 2022).

Vegetation and Land Cover

The entire project site was previously used for commercial agricultural purposes, and overall, the project site is disturbed due to human activity. The entire site is identified as "Disturbed Habitat" (**11300**; Oberbauer et. al. 2008) and is dominated by non-native grasses and forbs, including cheese weed (*Malva parviflora*), goose foot (*Chenopodium* sp.), nettles (*Urtica* spp.), wild radish (*Raphanus sativa*), London rocket (*Sisymbrium irio*), thistles (*Cirsium* spp.), bromes (*Bromus* spp.) and mustards (*Brassica* spp.). Seven (7) native plant species were observed during the reconnaissance survey including coyote brush (*Baccharis pilularis*), southern cattail (*Typha domingensis*), California sycamore (*Platanus racemosa*), fringed willow herb (*Epilobium ciliatum* ssp. *ciliatum*), little spring beauty (*Claytonia exigua*), red maids (*Calandrinia menziesii*), and stinging nettle (*Urtica dioica ssp. holosericea*) were observed.

The southeastern and eastern portions of the project site have small stands of Mexican fan palms (*Washingtonia robusta*), queen palms (*Syagrus romanzoffiana*), pepper trees (*Schinus molle*), and European olive (*Olea europaea*). The northern portion, located along Cox Road, has a row of ornamental trees that include red gum eucalyptus (*Eucalyptus camaldulensis*), oriental planetree (*Platanus orientalis*) and one California sycamore on the far west corner of the project site. This tree appears to be just outside of the project limits but was within the study area (Figure 5).

No sensitive plant communities are present on the project site. Overall, the project site has been designated as Disturbed habitat/agricultural. Refer to Attachment C for representative site photographs and Figure 5 for vegetation communities/landcover types. Refer to Attachment A for a full list of floral species observed.

Jurisdictional Wetlands and Waterways

Three non-jurisdictional stormwater features were found outside of the project site located along the southern boundary line (Figure 5; Attachment 3, Photograph 14, 15, and 16). Two of the non-jurisdictional features are human made concrete v-ditches that convey flows along the southern boundary, one from the eastern boundary and the other from the western boundary. The third feature is an underground culvert used to transport surface water flow from Cox Road and the adjacent neighborhoods. All three features convey stormwater flow into a small, rip-rap lined concrete channel that has no vegetation outside of the project site. This channel conveys flows for a short distance into a concrete-grated culvert inlet that conveys flows under private properties to the southwest. These artificial stormwater features were constructed within a drainage easement required by the adjacent residential development to the north.





Figure 5 Vegetation Communities and Landcover

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22-12442 Cox & Mulberry Fig 5 Vegetation Communities and Landcover



The small, isolated features are described as "Areas permanently or periodically inundated by water, which have been significantly modified by human activity. This would be categorized as a "Disturbed Wetland" (11200; Oberbauer et. al. 2008). Although the definition of a Disturbed Wetland includes a feature such as having concrete lining, or rip-rap; Rincon preliminarily concluded that the stormwater features would not be described as a wetland. Even though a formal jurisdictional delineation was not completed, the features do not meet the criteria of a wetland under the CWA (*Sackett v. EPA*, 2023) based on the lack of hydric soils, hydrophytic vegetation, permanent water, connection to a navigable waterway, or a defined ordinary high water mark (OHWM), is unlikely jurisdictional under the CFGC due to the lack of a streambed, and unlikely jurisdictional under the PCWQCA due to the artificial origin of the feature (human-constructed stormwater infrastructure within a required drainage easement) and the fact that this feature would not qualify as an artificial wetland under the State Water Resources Control Board State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (State Water Resources Control Board 2021).

Wildlife Movement

CDFW and the California Department of Transportation established the statewide California Essential Habitat Connectivity (CEHC) project. The goal of the CEHC project was to identify large remaining blocks of intact habitat or natural landscape and model linkages between them that need to be maintained, particularly as corridors for wildlife (CDFW 2022f). The project site location was compared to the CEHC's mapped wildlife corridors. The project site is not located within a CEHC area nor is it located within a BCLA as identified by the MHCP.

General Wildlife

The project site provides limited habitat for wildlife species but could potentially provide nesting habitat for common nesting birds and raptors protected under the CFGC Section 3503 and the MBTA. Bird species observed on site during the survey include white-crowned sparrow (*Zonotrichia leucophrys*), song sparrow (*Melospiza melodia*), European starling (*Sturnus vulgaris*), northern mockingbird (*Mimus polyglottos*), lesser goldfinch (*Spinus psaltria*), house finch (*Haemorhous mexicanus*), and Anna's hummingbird (*Calypte anna*). Bird species observed in the 250-foot buffer to the east and west include lazuli bunting (*Passerina amoena*), mourning dove (*Zenaida macroura*), California towhee (*Melozone crissalis*), American crow (*Corvus brachyrhynchos*), and bushtit (*Psaltriparus minimus*). Reptile species observed on site include western fence lizard (*Sceloporus occidentalis*) and western side-blotched lizard (*Uta stansburiana*). Mammal species observed include desert cottontail (*Sylvilagus audubonii*). Coyotes (*Canis latrans*) were not seen on site; however old scat was observed. Refer to Attachment 1 for a full list of faunal species observed.

Impact Analysis

Potential impacts to sensitive or special-status biological resources either within or that have potential to occur in the study area are analyzed below pursuant to Appendix G of the CEQA Guidelines.



Special-Status Species

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

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

The CNDDB/CNPS query results include 54 special-status plant species within five (5) miles (for CNDDB) and nine (9)-quadrangle search area (for CNPS) of the project site. Special-status plant species typically have specialized habitat requirements, including plant community types, soils, and elevational ranges. Of the 54 species, none are expected to occur on site based on the project site's location and clear lack of suitable habitat (e.g., mountains, desert, elevational ranges). No special-status plant species have moderate or high potential to occur on site given the high disturbance, lack of suitable habitat, and elevation on the project site. Therefore, impacts to special status plant species are not expected to occur as a result of project implementation.

The CNDDB query results include 33 special-status wildlife species within five (5) miles of the project site. The potential for special-status wildlife species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions. Of the 33 special-status wildlife species, none were observed on site. One MHCP and SSC, the western yellow bat (*Lasiurus xanthinus*), has a low potential to occur with associated roosting habitat present. A stand of mature untrimmed Mexican fan palm trees is located in the southeastern portion of the study area that provide potential roosting habitat. No other special-status wildlife species are expected to occur in the study area due to the lack of suitable habitat.

As noted above, vegetation on the project site could also provide suitable nesting habitat for common avian species that were observed during the reconnaissance survey. Bird nests and eggs are protected under the CFGC Section 3503 and the MBTA. Common species such as mourning dove and house finch as well as MHCP listed sensitive species such as Cooper's hawk (*Accipiter cooperii*) have the potential to nest in tall shrubs and/or trees, even in highly disturbed settings. Direct impacts (e.g., injury or mortality) to nesting birds or indirect impacts (e.g., noise, dust) that disrupt nesting behavior and reproductive success would be significant. Implementation of recommended pre-construction nesting bird surveys (discussed below in Recommended Actions) would reduce impacts to nesting birds to a less-than-significant level.

Also as noted above, the mature Mexican fan palm trees in the study area provide potential roosting habitat for the western yellow bat. If bats are present, removal of these Mexican fan palm trees could disrupt maternity roosting which would result in significant impacts. Implementation of a recommended pre-construction bat roost survey (discussed below in Recommended Actions) would reduce impacts to western yellow bat to a less-than-significant level.

Sensitive Plant Communities

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.



The entire project site is vacant and was previously comprised of weedy, non-native annuals, perennials, and ornamental trees that is frequently subject to human activity. Historical site usage of the study area was for commercial farming activities, which was observed on the most recent site visit on October 14, 2024, when a Rincon biologist observed recent discing on the project site.

Three features were observed on the southern edge and outside of the project site. No water was observed flowing, and all features were concrete- and rip rap-lined with no vegetation. The features are described as "Areas permanently or periodically inundated by water, which have been significantly modified by human activity." This would be categorized as a "Disturbed Wetland" (**11200**; Oberbauer et. al. 2008) when water is present. However, despite this definition, Rincon preliminarily concluded that the stormwater features would not be described as a wetland, due to the lack of hydric soil, hydrophytic vegetation, permanent water, connection to a navigable waterway, or a defined OHWM. No sensitive plant communities are present on the project site. Due to the lack of native vegetation, historical usage, and presence of disturbed habitat, therefore, the project would not have a substantial adverse effect on any sensitive natural communities.

Jurisdictional Wetlands and Waterways

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

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

The entire project site is a disturbed site that has frequently been subject to human activity including discing and other agricultural practices. Three stormwater features are present on the project site. The small, isolated features are described as "Areas permanently or periodically inundated by water, which have been significantly modified by human activity." This would fall under the categorization as a "Disturbed Wetland" (**11200**; Oberbauer et. al. 2008) when water is present. However, despite this definition, Rincon preliminarily concluded that the stormwater features would not be described as a wetland, due to the lack of hydric soil, hydrophytic vegetation, permanent water, connection to a navigable waterway, or a defined OHWM. Rincon has preliminarily concluded that these isolated features do not fall under U.S. Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (RWQCB), or CDFW jurisdiction and do not meet those definitions as an artificial wetland.

Wildlife Movement

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of wildlife nursery sites.

The proposed project site is located near a MHCP hard line conservation area but is separated by residential homes and public roads. No vegetation within the site is mapped as part of the CEHC project. The project site is also not located in a BCLA as identified by the MHCP. The site is located near active roads to the north and east and is surrounded by residential development. The project site is also currently fenced with barbed wire on all sides. No existing wildlife corridors are present on the project



site. The site is highly disturbed and has been altered by human activity from historical agricultural use. The project site is not adjacent to any preserves or open space (Figure 3). For these reasons, impacts to wildlife movement would be considered less than significant.

Local Policies and Ordinances

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

- *e)* Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Policy COS-2.2: Limit, to the extent feasible, the conversion of open space to urban uses and place a high priority on acquiring and preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, water and agricultural resources protection, and overall community benefit.
- **Policy COS-2.6:** Preserve healthy mature trees where feasible; where removal is necessary, trees shall be replaced at a ratio of 1:1.

Ornamental trees, including eucalyptus and false sycamores, are located along the north side of the project site along Cox Road. Additionally, several mature Mexican fan palms are in the southeast corner of the project site. Removal of these trees may conflict with Policy COS-2.6. Avoidance of these trees is therefore recommended if feasible. If tree avoidance is not feasible, then replacement of healthy mature trees removed at a 1:1 ratio is recommended to achieve compliance with Policy COS-2.6. Avoidance or replacement of healthy mature trees at a 1:1 ratio (discussed below in Recommended Actions) would reduce impacts to mature trees to a less-than-significant level.

Adopted or Approved Plans

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

f) Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP), or other approved local, regional, or state habitat conservation plan.

The project site is located within the jurisdiction of the San Diego MHCP but is not located within a Conservation Area. As a result, proposed activities at the project side would avoid direct impacts to the MHCP Conservation Areas and would not conflict with the MHCP Conservation Objectives.

Recommended Actions

BIO-1 Nesting Bird Surveys

The following mitigation measure, in compliance with MBTA and CFGC requirements, is recommended to reduce impacts to nesting birds to a less than significant level.

To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin within the breeding season, then a pre-



construction nesting bird survey shall be conducted no more than three (3) days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted within the project site, plus a 300-foot buffer (500-foot for raptors), on foot, and within inaccessible areas (i.e., private lands) afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California scrub communities. If nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

BIO-2 Pre-Construction Bat Roost Survey

The following mitigation measure is recommended to reduce impacts to western yellow bat to a less than significant level.

No less than 30 days prior to vegetation removal, a qualified Bat Biologist shall conduct a preconstruction bat survey within the project site plus a 100-foot buffer as access allows to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, within trees on the project site. The survey shall use acoustic technology and emergency counts to maximize detection of bats on-site. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

If a maternity roost is determined present, a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active.

BIO-3 Mature Tree Avoidance or Replacement

The following mitigation measure, in compliance with Policy COS-2.6, is recommended to reduce impacts to healthy mature trees to a less than significant level.

Project implementation shall avoid the healthy, mature trees on the project site if feasible. If avoidance of the trees is not feasible, the project applicant shall replace each removed tree at a 1:1 mitigation to impact ratio on the project site. Each replaced tree shall be preserved in perpetuity.

Conclusion

Based on the field reconnaissance survey, database and literature searches, and overall assessment, the proposed project site development is not likely to impact sensitive biological resources if the mitigation measures recommended above are incorporated. No sensitive wildlife or plant species were found during the site survey and are not likely to occur. Due to the lack of native vegetation, historical uses, and resulting disturbed habitat, the project would not have a substantial adverse effect on sensitive natural communities. The three stormwater features outside of the southern portion of the project site are not likely federal or state jurisdictional, however a formal delineation was not performed. Rincon



has preliminarily concluded these isolated, artificial stormwater features do not fall under USACE, RWQCB, or CDFW jurisdiction and do not meet those definitions as an artificial wetland. Rincon recommends conducting a pre-construction nesting bird and/bat assessment survey prior to vegetation removal, specifically during the breeding season (February 1 through August 31) to adhere to Mitigation Measure BIO-1, MBTA, and CAFGC requirements to reduce any impacts to nesting birds.

Sincerely, Rincon Consultants, Inc.

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Kevin Gugerty Biologist

Attachments

Attachment 1 Floral and Faunal Compendium

Attachment 2 Special-Status Species Evaluation Table

Attachment 3 Site Photographs

Angie Harbin Principal Biologist



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Attachment 1

Floral and Faunal Compendium

Floral and Faunal Compendium

Scientific Name	Common Name	Status	Origin
Plants			
Avena barbata	slender wild oat	Cal-IPC Moderate	Introduced
Baccharis pilularis	coyote brush	-	Native
Brassica nigra	black mustard	Cal-IPC Moderate	Introduced
Brassica rapa	field mustard	Cal-IPC Limited	Introduced
Bromus diandrus	ripgut brome	Cal-IPC Moderate	Introduced
Calandrinia menziesii	red maids	_	Native
Claytonia exigua	little spring beauty	-	Native
Cotula austalis	Australian brass buttons	-	Introduced
Chenopodium murale	nettle leaf goose foot	-	Introduced
Epilobium ciliatum ssp. ciliatum	fringed willow herb	-	Native
Erigeron bonariensis	flax horse weed	-	Introduced
Erodium cicutarium	redstem filaree	Cal-IPC Limited	Introduced
Eucalyptus camaldulensis	red gum tree	Cal-IPC Limited	Introduced
Festuca myuros	rattail fescue	Cal-IPC Moderate	Introduced
Foeniculum vulgare	sweet fennel	Cal-IPC Moderate	Introduced
Helianthus annuus	common sunflower	-	Native
Hirschfeldia incana	shortpod mustard	Cal-IPC Moderate	Introduced
Hordeum murinum	wall barley	Cal-IPC Moderate	Introduced
Lactuca serriola	prickly lettuce	-	Introduced
Lepidium didymium	lesser swine cress	-	Introduced
Lysimachia arvensis	scarlet pimpernel	-	Introduced
Malva neglecta	common mallow	-	Introduced
Medicago polymorpha	bur clover	Cal-IPC Limited	Introduced
Olea europaea	European olive	-	Introduced
Phoenix canariensis	Canary island date palm	_	Introduced
Pinus spp.	pine	_	Introduced
Platanus orientalis	oriental planetree	-	Introduced
Platanus racemosa	California sycamore	-	Native
Poa pratensis	Kentucky bluegrass	Cal-IPC Limited	Introduced
Polycarpon tetraphyllum	four leaved all seed	-	Introduced
Raphanus sativus	wild radish	Cal-IPC Limited	Introduced
Rumex crispus	curly dock	Cal-IPC Limited	Introduced
Salsola tragus	Russian thistle	Cal-IPC Limited	Introduced
Schinus molle	Peruvian pepper tree	Cal-IPC Limited	Introduced
Sisymbrium irio	London rocket	Cal-IPC Limited	Introduced
Sonchus oleraceus	common sow-thistle	_	Introduced
Silybum marianum	milk thistle	Cal-IPC Limited	Introduced

Scientific Name	Common Name	Status	Origin
Syagrus romanzoffiana	queen palm	_	Introduced
Typha domingensis	southern cattail		Native
Urtica dioica ssp. holosericea	stinging nettle	-	Native
Vinca major	greater periwinkle	Cal-IPC Moderate	Introduced
Washingtonia robusta	Mexican fan palm	Cal-IPC Moderate	Introduced
Wildlife			
Buteo lineatus	red-shouldered hawk	-	Native
Calypte anna	Anna's hummingbird	_	Native
Corvus brachyrhynchos	American crow	-	Native
Corvus corax	common raven	-	Native
Haemorhous mexicanus	house finch	-	Native
Melospiza melodia	song sparrow	_	Native
Melozone crissalis	California towhee	-	Native
Mimulus polyglottos	northern mockingbird	-	Native
Passerina amoena	lazuli bunting	-	Native
Pipilo maculatus	spotted towhee	-	Native
Psaltriparus minimus	bushtit	-	Native
Sayornis nigricans	black phoebe	-	Native
Sceloporus occidentalis	western fence lizard	-	Native
Spinus psaltria	lesser goldfinch	-	Native
Sturnus vulgaris	European starling	-	Introduced
Sylvilagus audubonii	desert cottontail	-	Native
Tyrannus vociferans	Cassin`s kingbird	-	Native
Uta stansburiana elegans	western sid-blotched lizard	-	Native
Zenaida macroura	mourning dove	-	Native
Zonotrichia leucophrys	white-crowned sparrow	_	Native

CRPR (CNPS California Rare Plant Rank)

1A = Presumed Extinct in California

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

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

3 = Need more information (a Review List)

4 = Plants of Limited Distribution (a Watch List)

CRPR Threat Code Extension

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

.2 = Fairly endangered in California (20-80% of occurrences threatened)

.3 = Not very endangered in California (<20% of occurrences threatened)

California Invasive Plant Council (Cal-IPC)

Limited = Invasive but ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

Moderate = Have substantial and apparent, but generally not severe, ecological impacts on physical processes, plant and animal communities, and vegetation structure. Reproductive biology and other attributes are conducive to moderate to high rates of



Scientific N	lame Common Name	Common Name Status		
	dispersal, though establishment is generally dependent upon ecolog may range from limited to widespread.	gical disturbance. Ecolog	ical amplitude and distribution	
High =	Have severe ecological impacts on physical processes, plant and ani biology and other attributes are conducive to moderate to high rate distributed ecologically.	mal communities, and ve s of dispersal and establ	egetation structure. Reproductive lishment. Most are widely	

Sources: March 2, 2022, biological reconnaissance survey; CDFW 2022c, 2022d; Cal-IPC 2020; Calflora 2020

Attachment 2

Special-Status Species Evaluation Table



Atriplex pacifica

South Coast saltscale

None/None

1B.2

Status Fed/State ESA Scientific Name CRPR,CDFW Potential for Occurrence/ **Common Name** MHCP Covered **Habitat Requirements Basis for Determination** Plants Chaparral, Coastal scrub, Desert dunes. Abronia villosa var. None/None No Potential. The species' Sandy soils. 75-245 m. Blooms (Jan) Aurita 1B.1 associated habitat and soils are Mar-Sept. Chaparral sandnot present in the study area. verbena FT/SE Acanthomintha ilicifolia Chaparral, coastal scrub, valley and No Potential. The species' San Diego thorn-mint 1B.1 foothill grassland, vernal pools. associated soils are not present MHCP Covered Endemic to active vertisol clay soils of in the study area. mesas and valleys. Usually on clay Species lenses within grassland or chaparral communities. 10-960 meters (m). annual herb. Blooms Apr-Jun Adolphia californica None/None Chaparral, coastal sage scrub, valley No Potential. The species' and foothill grassland. On clay soils associated soils are not present California adolphia 2B.1 within grassland, coastal sage scrub, or in the study area. This species chaparral; various exposures. 10-740 was not detected during the m. perennial deciduous shrub. Blooms reconnaissance survey. Dec-May FE/None Chaparral, coastal scrub, valley and No Potential. Limited suitable Ambrosia pumila San Diego ambrosia 1B.1 foothill grassland. Sandy loam or clay habitat (sandy areas) present in MHCP Covered soil; sometimes alkaline. In valleys; the study area. This species persists where disturbance has been was not detected during the Species superficial. Sometimes on margins or reconnaissance survey. near vernal pools. 20-415 m. perennial rhizomatous herb. Blooms Apr-Oct Aphanisma blitoides None/None Coastal bluff scrub, coastal dunes, No potential. Suitable habitat coastal scrub. Gravelly and sandy soils. is not present in the study area, aphanisma 1B.2 MHCP Covered 1-305. Blooms Feb-Jun which is too far from the coast. Species Arctostaphylos FE/None Chaparral. Sandy coastal mesas and No Potential. Suitable habitat glandulosa ssp. 1B.1 ocean bluffs; in chaparral or Torrey is not present in the study area, Crassifolia MHCP Covered pine (Pinus torreyana ssp. torreyana) which is too far from the coast. Del Mar manzanita Species forest. 0-365 m. perennial evergreen This species was not detected shrub. Blooms Dec-Jun in the study area. Arctostaphylos None/None Chaparral. Usually found in gabbro No Potential. This conspicuous rainbowensis 1B.1 chaparral. 100-870 m. perennial shrub species was not observed evergreen shrub. Blooms Dec-Mar Rainbow manzanita during any of the surveys. Atriplex coulteri None/None Coastal bluff scrub, coastal dunes, No Potential. The species' Coulter's saltbush 1B.2 coastal scrub, valley and foothill associated soils are not present grassland. Ocean bluffs, ridgetops, as in the study area. well as alkaline low places. Alkaline or clay soils. 3-460 m. perennial herb. Blooms Mar-Oct

Coastal scrub, coastal bluff scrub,

m. annual herb. Blooms Mar-Oct

playas, coastal dunes. Alkali soils. <140

Special-Status Species Evaluation Table

Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
Atriplex parishii Parish's brittlescale	None/None 1B.1	Vernal pools, chenopod scrub, playas. Usually on drying alkali flats with fine soils. 25-1900 m. annual herb. Blooms Jun-Oct	No Potential. The species' associated habitat is not present in the study area.
Baccharis vanessae Encinitas baccharis	FT/SE 1B.1 MHCP Covered Species	Chaparral, cismontane woodland. On sandstone soils in steep, open, rocky areas with chaparral associates. 60-720 m. perennial deciduous shrub. Blooms Aug, Oct, Nov	No Potential. This conspicuous shrub species was not observed during the reconnaissance survey.
Bloomeria clevelandii San Diego goldenstar	None/None 1B.1	Coastal sage scrub, chaparral, valley and foothill grassland, freshwater wetlands in vernal pools and clay soils. 50-465 m. perennial bulbiferous herb. Blooms Apr-May.	No Potential. The species' associated soils are not present in the study area.
<i>Brodiaea filifolia</i> thread-leaved brodiaea	FT/SE 1B.1	Chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools. Usually associated with annual grassland and vernal pools; often surrounded by shrubland habitats. Occurs in openings on clay soils. 25- 1120 m. perennial bulbiferous herb. Blooms Mar-Jun	No Potential. Annual grassland, vernal pools and clay soils are not present in the study area.
<i>Brodiaea orcuttii</i> Orcutt's brodiaea	None/None 1B.1	Vernal pools, valley and foothill grassland, closed-cone coniferous forest, cismontane woodland, chaparral, meadows, and seeps. Mesic, clay habitats; usually in vernal pools and small drainages. 30-1692 m. perennial bulbiferous herb. Blooms May-Jul	No Potential. Clay soils are not present in the study area.
Ceanothus verrucosus wart-stemmed ceanothus	None/None 2B.2 MHCP Covered Species	Chaparral. 1-380 m. perennial evergreen shrub. Blooms Dec-May	No Potential. The species' associated habitat is not present in the study area.
<i>Centromadia parryi</i> ssp. <i>Australis</i> southern tarplant	None/None 1B.1	Marshes and swamps (margins), valley and foothill grassland, vernal pools. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. 0-975 m. Annual herb. Blooms May-Nov	No Potential. Marshes, swamps, grassland, and vernal pools are not present in the study area.
<i>Centromadia pungens</i> <i>ssp. laevis</i> smooth tarplant	None/None 1B.1	Valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland. Alkali meadow, alkali scrub; also in disturbed places. 5- 1170 m. annual herb. Blooms Apr-Sep	No potential. The species' associated habitat is not present in the study area.

Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
Chorizanthe orcuttiana Orcutt's spineflower	FE/SE 1B.1	Coastal scrub, maritime chaparral, closed-cone coniferous forest. Sandy sites and openings; sometimes in transition zones. 3-125 m. annual herb. Blooms Mar-May	No Potential. The study area is outside the known range of the species, with most records being coastal.
Chorizanthe polygonoides var. longispina long-spined spineflower	None/None 1B.2	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Gabbroic clay. 30-1540 m. annual herb. Blooms Apr-Jul	No Potential. The species' associated soils are not present in the study area.
<i>Clarkia delicata</i> delicate clarkia	None/None 1B.2	Cismontane woodland, chaparral. Often on gabbro soils. 235-1000 m. annual herb. Blooms Apr-Jun	No Potential. The species' associated soils are not present in the study area.
Comarostaphylis diversifolia ssp. diversifolia summer holly	None/None 1B.2 MHCP Covered Species	Chaparral, cismontane woodland. Often in mixed chaparral in California, sometimes post-burn. 30-790 m. perennial evergreen shrub. Blooms Apr-Jun	No Potential. The species' associated habitat is not present in the study area.
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i> Del Mar Mesa sand aster	None/None 1B.1 MHCP Covered Species	Chaparral, coastal scrub, coastal bluff scrub. In coastal, shrubby communities on maritime sandy sediments and conglomerates; in openings. 15-150 m. perennial herb. Blooms May, Jul, Aug, and Sep	No Potential. The species' associated habitat is not present in the study area. The study area is outside the known range of the species, with most records being coastal.
Cryptantha wigginsii Wiggins' cryptantha	None/None 1B.2	Coastal scrub. Often on clay soils. 45- 110 m. annual herb. Blooms Feb-Jun	No Potential. The species' associated soils are not present in the study area.
<i>Dudleya blochmaniae</i> ssp. <i>Blochmaniae</i> Blochman's dudleya	None/None 1B.1 MHCP Covered Species	Coastal scrub, coastal bluff scrub, chaparral, valley, and foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 5-450 m. perennial herb. Blooms Apr-Jun	No Potential. The species' associated topography is not present in the study area.
Dudleya multicaulis many stemmed dudleya	None/None 1B.2	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 15-790 m. perennial herb. Blooms Apr-Jul	No Potential. The species' associated topography is not present in the study area.
<i>Dudleya variegata</i> variegated dudleya	None/None 1B.2 MHCP Covered Species	Chaparral, coastal scrub, cismontane woodland, valley and foothill grassland. In clay soils; sometimes associated with vernal pool margins. 3-580 m. perennial herb. Blooms Apr-Jun	No Potential. The species' associated topography is not present in the study area.
<i>Dudleya viscida</i> sticky dudleya	None/None 1B.2 MHCP Covered Species	Coastal scrub, coastal bluff scrub, chaparral, cismontane woodland. On north and south-facing cliffs and banks. 10-550 m. perennial herb. Blooms May- Jun	No Potential. The species' associated topography is not present in the study area

Scientific Name Common Name Ericameria palmeri var. palmeri Palmers goldenbush	Status Fed/State ESA CRPR,CDFW MHCP Covered None/None 1B.2	Habitat Requirements Coastal scrub, chaparral. On granitic soils, on steep hillsides. Mesic sites. 5- 625 m. perennial evergreen shrub. Blooms (Jul)Sen-Nov	Potential for Occurrence/ Basis for Determination No Potential. The species' associated habitat is not present in the study area.
Eryngium aristulatum var. parishii San Diego button- celery	FE/SE 1B.1 MHCP Covered Species	Vernal pools, coastal scrub, valley and foothill grassland. San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. 20- 620 m. annual/perennial herb. Blooms Apr-Jun	No Potential. The species' associated habitat is not present in the study area.
<i>Eryngium pendletonense</i> Pendleton button- celery	None/None 1B.1	Coastal bluff scrub, valley and foothill grassland, vernal pools. Clay. Vernally mesic sites. 20-30 m. perennial herb. Blooms Apr-Jun(Jul)	No Potential. The species' associated soils are not present in the study area.
Erysimum ammophilum sand-loving wallflower	None/None 1B.2	Chaparral (maritime), coastal dunes, coastal scrub. Sandy openings. 5-130 m. perennial herb. Blooms Feb-Jun	No Potential. The species' associated habitat is not present in the study area. Study area is outside the known distribution of the species
Euphorbia misera cliff spurge	None/None 2B.2 MHCP Covered Species	Coastal bluff scrub, coastal scrub, Mojavean desert scrub. Rocky sites. 3- 430 m. perennial shrub. Blooms Dec- Aug(Oct)	No Potential. The species' associated habitat is not present in the study area.
Ferocactus viridescens San Diego barrel cactus	None/None 2B.1 MHCP Covered Species	Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Often on exposed, level or south-sloping areas; often in coastal scrub near crest of slopes. 3-450 m. perennial stem succulent. Blooms May-Jun	No Potential. The species' associated habitat is not present in the study area.
Hazardia orcuttii Orcutt's hazardia	None/ST 1B.1 MHCP Covered Species	Maritime chaparral, coastal scrub. Often on clay; in grassy edges of chaparral and coastal scrub. 80-85 m. perennial evergreen shrub. Blooms Aug-Oct	No Potential. The species' associated clay soils are not in the study area.
<i>Heterotheca sessiliflora</i> ssp. <i>Sessiliflora</i> beach golden aster	None/None 1B.1	Coastal dunes, coastal scrub, chaparral (coastal). Sandy sites. 0-1225 m. perennial herb. Blooms Mar-Dec	No Potential. No coastal sage scrub is present in the study area.
Horkelia cuneata var. puberula mesa horkelia	None/None 1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 15-1645 m. perennial herb. Blooms Feb-Jul(Sep)	No potential. The species' associated habitat is not present in the study area.

<i>Scientific Name</i> Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
<i>Horkelia truncata</i> Ramona horkelia	None/None 1B.3	Chaparral, cismontane woodland. Habitats in California include mixed chaparral, vernal streams, and disturbed sites near roads. Clay soil; at least sometimes on gabbro. 400-1300 m. perennial herb. Blooms May-Jun	No Potential. The species' associated soils and habitat are not present in the study area.
Isocoma menziesii var. decumbens decumbent goldenbush	None/None 1B.2	Coastal scrub, chaparral. Sandy soils; often in disturbed sites. 10-135 m. perennial shrub. Blooms Apr-Nov	No Potential. The species' associated habitat is not present in the study area. The species' was not detected during the reconnaissance survey.
<i>lva hayesiana</i> San Diego marsh-elder	None/None 2B.2 MHCP Covered Species	Marshes and swamps, alkali sinks, wetland-riparian, and playas. 10- 500m. perennial herb. Blooms Apr-Oct.	No Potential. The species' associated habitat is not present in the study area.
<i>Lasthenia glabrata</i> ssp. <i>Coulteri</i> Coulter's goldfields	None/None 1B.1	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1220 m. annual herb. Blooms Feb-Jun	No Potential. The species' associated habitat is not present in the study area.
Leptosyne maritima sea dahlia	None/None 1B.2	Coastal scrub, coastal bluff scrub. Occurs on a variety of soil types, including sandstone. 5-185 m. perennial herb. Blooms Mar-May	No Potential. The species' associated habitat is not present in the study area.
Monardella hypoleuca ssp. intermedia intermediate monardellaa	None/None 1B.3	Chaparral, cismontane woodland, lower montane coniferous forest (sometimes). Often in steep, brushy areas. 195-16750 m. perennial rhizomatous herb. Blooms Apr-Sep	No Potential. The species' associated habitat is not present in the study area.
<i>Monardella hypoleuca</i> ssp. <i>lanata</i> felt-leaved monardella	None/None 1B.2	Chaparral, cismontane woodland. Occurs in understory in mixed chaparral, chamise chaparral, and southern oak woodland; sandy soil. 300-1575 m. perennial rhizomatous herb. Blooms Jun-Aug	No Potential. The species' associated habitat is not present in the study area.
Navarretia fossalis spreading navarretia	FT/None 1B.1 MHCP Covered Species	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 30- 655 m. annual herb. Blooms Apr-Jun	No Potential. The species' associated habitat is not present in the study area. Species' does have recorded occurrences within five miles of study area.
Nolina cismontane chaparral nolina	None/None 1B.2	Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 140-1275 m. perennial evergreen shrub. Blooms (Mar)May-Jul	No Potential. The species' associated habitat is not present in the study area.

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Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
<i>Orcuttia californica</i> California Orcutt grass	FE/SE 1B.1 MHCP Covered Species	Vernal pools. 10-660 m. annual herb. Blooms Apr-Aug	No Potential. The species' associated habitat (vernal pools) is not present in the study area.
<i>Pinus torreyana</i> ssp. <i>Torreyana</i> Torrey pine	None/None 1B.2 MHCP Covered Species	Closed-cone coniferous forest, chaparral. On dry, sandstone slopes. 30-160 m. perennial evergreen tree.	No Potential. Associated habitat and soils are not present in the study area. The species' was not detected during reconnaissance survey.
Pogogyne abramsii San Diego mesa mint	FE/SE 1B.1	Vernal pools within grasslands, chamise chaparral, or coastal sage scrub communities. 90-200 m. annual herb. Blooms Mar-Jul	No Potential. The species' associated habitat (vernal pools) is not present in the study area.
Pseudognaphalium leucocephalum white rabbit-tobacco	None/None 2B.2	Riparian woodland, cismontane woodland, coastal scrub, chaparral. Sandy, gravelly sites. 35-515 m. perennial herb. Blooms (Jul)Aug- Nov(Dec)	No Potential. The species' associated habitat is not present in the study area.
<i>Quercus dumosa</i> Nuttall's scrub oak	None/None 1B.1 MHCP Covered Species	Closed-cone coniferous forest, chaparral, coastal scrub. Generally, on sandy soils near the coast; sometimes on clay loam. 15-400 m. perennial evergreen shrub. Blooms Feb-Apr (May-Aug)	No Potential. This species was not detected during the reconnaissance survey.
Salvia munzii Munz's sage	None/None 2B.2	Coastal scrub, chaparral. Rolling hills and slopes, in rocky soil. 115-1065 m. perennial evergreen shrub. Blooms Feb-Apr	No Potential. The species' associated habitat is not present in the study area.
Stemodia durantifolia white woolly stemodia	None/None 2B.1	Sonoran Desert scrub. Sandy soils; mesic sites. 180-300 m. perennial herb. Blooms (Jan) Apr, Jun, Aug, Sep, Oct, Dec	No Potential. The species' associated habitat is not present in the study area. Additionally, the study area is outside of the species' known geographic range.
Suaeda esteroa estuary seablite	None/None 1B.2	Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. 0-80 m. perennial herb. Blooms (May) Jul-Oct (Jan)	No Potential. The species' associated habitat is not present in the study area. Additionally, the study area is outside of the species' known geographic range.
<i>Tetracoccus dioicus</i> Parry's tetracoccus	None/None 1B.2 MHCP Covered Species	Chaparral, coastal scrub. Stony, decomposed gabbro soil. 135-705 m. perennial deciduous shrub. Blooms Apr-May	No Potential. The species' associated habitat is not present in the study area. Species' does have recorded occurrences within five miles of study area.

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Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
Invertebrates			
Branchinecta sandiegonensis San Diego fairy shrimp	FE/None MHCP Covered Species	Endemic to San Diego and Orange County mesas. Vernal pools.	No Potential. The species' associated habitat is not present in the study area.
<i>Bombus crotchii</i> Crotch bumble bee	None/None	Grasslands and shrublands with floral species. Associated food plants include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum species. Commonly found on Asclepias, Chaenactis, Medicago, and Salvia plant species.	No Potential. The species' associated habitat is not present in the study area.
Amphibians			
Spea hammondii western spadefoot	None/None SSC MHCP Covered Species	Road rut pools, vernal pools, alluvial fans, and streams in grassland habitats and valley-foothill hardwood woodlands.	No Potential. The species' associated habitat is not present in the study area.
Reptiles			
Arizona elegans occidentalis California glossy snake	None/None SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	No Potential. The species' associated habitat is not present in the study area.
Aspidoscelis hyperythra orange-throated whiptail	None/None SSP MHCP Covered Species	Intact coastal sage scrub, <i>Eriogonum fasciculatum</i> dominant, Salvia, Yucca, Opuntia, and Artemisia present.	Low Potential. Suitable habitat is not present in the study area. Species does have recorded occurrences within five miles of the study area.
Aspidoscelis tigris stejnegeri coastal whiptail	None/None SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	Low Potential. Suitable habitat is not present in the study area. Species does have recorded occurrences within five miles of the study area.
Crotalus ruber red-diamond rattlesnake	None/None SSC	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	Low Potential. The species' associated habitat has limited presence in the study area.

Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
Phrynosoma blainvillii coast horned lizard	None/None SSC MHCP Covered Species	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	No Potential. No suitable habitat is present in the study area.
Plestiodon skiltonianus interparietalis Coronado skink	None/None WL	Grassland, chaparral, pinon-juniper and juniper sage woodland, pine (<i>Pinus</i> sp.)-oak and pine forests in Coast Ranges of southern California. Prefers early successional stages or open areas. Found in rocky areas close to streams and on dry hillsides.	No Potential. No potential chaparral habitat is present in the study area.
Anniella stebbinsi Southern California legless lizard	None/None	Locally abundant. Generally found in coastal dunes and in interior habitat areas with chapparal, desert scrub, sandy washes, and associated habitat with sycamores, cottonwoods, and oaks. Prefers warm, moist soils and leaf litter.	No Potential. The species' associated habitat is not present in the study area. Preferred soils are also not present in the study area.
Thamnophis hammondii two-striped gartersnake	None/None SSC	Generally found near water sources - pools, creeks, cattle tanks, and others, often in rocky areas. Associated vegetation: oak woodland, willow (<i>Salix</i> sp.), coastal sage scrub, scrub oak, sparse pine, chaparral, and brushland.	No Potential. The species' associated habitat is not present in the study area.
Birds			
Accipiter cooperii Cooper's Hawk	None/None WL MHCP Covered Species	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood- plains; also, live oaks.	Moderate Potential. The species' associated nesting and foraging habitat is present in the study area. Fan palms and ornamental trees potentially could provide nesting habitat.
Agelaius tricolor tricolored blackbird	None/ST SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
Athene cunicularia hypugaea burrowing owl	None/None BCC, SSC	Grassland, agricultural land, coastal dunes. Require rodent and small mammal burrows.	No Potential. The species' associated nesting and foraging habitat is not present in the study area. No suitable burrows were identified during the survey.

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Laterallus jamaicensis coturniculus California black rail	None/ Threatened FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
Buteo swainsoni Swainson's hawk	None/ST BCC MHCP Covered Species	Plains, range, open hills, sparse trees, including cottonwoods for nesting. Uncommon spring migrant. Local breeding population now extirpated.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	FT/SE	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
Plegadis chihi white-faced ibis	None/None WL MHCP Covered Species	Shallow freshwater marsh. Dense tule thickets for nesting, interspersed with areas of shallow water for foraging.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
Aimophila ruficeps canescens southern California rufous-crowned sparrow	None/None WL MHCP Covered Species	Found in open oak woodlands and dry uplands with grassy vegetation and bushes. Often found near rocky outcroppings. Also known from coastal scrublands and chaparral areas.	No Potential. The species' associated nesting and foraging habitat is not present in the study area
Icteria virens yellow-breasted chat	None/None SSC MHCP Covered Species	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry (<i>Rubus</i> sp.), wild grape (<i>Vitis</i> sp.); forages and nests within 10 feet of ground.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.
Polioptila californica califórnica coastal California gnatcatcher	FT/None SSC MHCP Covered Species	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	No Potential. The species' associated nesting and foraging habitat is not present in the study area
Rallus obsoletus levipes light-footed Ridgway's rail	FE/SE FP MHCP Covered Species	Found in salt marshes traversed by tidal sloughs, where cord grass (<i>Spartina</i> sp.) and pickleweed (<i>Salicornia</i> sp.) are the dominant vegetation. Requires dense growth of either pickleweed or cordgrass for nesting or escape cover; feeds on mollusks and crustaceans.	No Potential. The species' associated nesting and foraging habitat is not present in the study area.

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<i>Scientific Name</i> Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
<i>Vireo bellii pusillus</i> least Bell's vireo	FE/SE None MHCP Covered Species	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis (<i>Baccharis</i> sp.), mesquite (<i>Prosopis</i> sp.).	No Potential. Suitable habitat is not present in the study area.
Mammals			
Chaetodipus californicus femoralis Dulzura pocket mouse	None/None SSC	Variety of habitats including coastal scrub, chaparral, and grassland in San Diego County. Attracted to grass- chaparral edges.	No Potential. Suitable habitat is not present in the study area.
<i>Chaetodipus fallax</i> northwestern San Diego pocket mouse	None/None SSC MHCP Covered Species	Found in chaparral, grasslands, scrub forests, and deserts. Major habitat requirement is the presence of low growing vegetation or rocky outcroppings, as well as sandy soil in which they dig burrows.	No Potential. The species' associated nesting and foraging habitat is not present in the study area
Corynorhinus townsendii Townsend's big-eared bat	None/None SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings of caves and abandoned buildings. Roosting sites limiting. Extremely sensitive to human disturbance.	No Potential. The species' associated roosting habitat is not present in the study area.
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	None/None SSC MHCP Covered Species	Intermediate canopy stages of shrub habitats and open shrub/herbaceous and tree/herbaceous edges. Coastal sage scrub habitats in Southern California.	No Potential. Suitable coastal sage scrub habitat is not present in the study area.
Nyctinomops femorosaccus pocketed free-tailed bat	None/None SSC	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	No Potential. The species' associated roosting habitat is not present in the study area.
<i>Lasiurus cinereus</i> hoary bat	None/None	Widespread. Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	No Potential. The species' associated roosting habitat is not present in the study area.
Nyctinomops macrotis big free-tailed bat	None/SSC	Low-lying arid areas in southern California. Need high cliffs or rocky outcrops for roosting sites.	No Potential. The species' associated roosting habitat is not present in the study area.
Antrozous pallidus pallid bat	None/None SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas, cliffs, and crevices for roosting.	No Potential. The species' associated roosting habitat is not present in the study area.

Scientific Name Common Name	Status Fed/State ESA CRPR,CDFW MHCP Covered	Habitat Requirements	Potential for Occurrence/ Basis for Determination
<i>Lasiurus xanthinus</i> Western yellow bat	None/None SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in broad-leaved trees, particularly palms. Forages over water and among trees.	Moderate Potential. The species' associated roosting habitat is present in the study area. A stand of mature fan palm trees with untrimmed fronds exists on site.
<i>Taxidea taxus</i> American badger	None/None SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	No Potential. No diagnostic sign of the species (e.g., burrows or digs) were identified in the study area.
Sensitive Communities			
San Diego Mesa Claypan Vernal Pool	None/None		No Potential. This vegetation community is not present in the study area.
Southern Cottonwood Willow Riparian Forest	None/None		No Potential. This vegetation community is not present in the study area.
Southern Maritime Chaparral	None/None		No Potential. This vegetation community is not present in the study area.
Southern Riparian Forest	None/None		No Potential. This vegetation community is not present in the study area.
Southern Riparian Scrub	None/None		No Potential. This vegetation community is not present in the study area.
Southern Sycamore Alder Riparian Woodland	None/None		No Potential. This vegetation community is not present in the study area.
Southern Willow Scrub	None/None		No Potential. This vegetation community is not present in the study area.

rincoi Sophia Mitchell & Associates **Biological Resources Assessment Memorandum for the** Cox and Mulberry Site - Water Mill Homes Project Status Fed/State ESA Scientific Name CRPR,CDFW Potential for Occurrence/ **Basis for Determination Common Name** Habitat Requirements MHCP Covered Regional Vicinity refers to within a 5-mile radius of the study area for the CNDDB search and nine quadrangles for the CNPS search. BCC = USFWS Bird of Conservation Concern **CRPR (CNPS California Rare Plant Rank)** FC = Federal Candidate Species 1A=Presumed Extinct in California FE = Federally Endangered 1B=Rare, Threatened, or Endangered in California and elsewhere FP = CDFW Fully Protected 2=Rare, Threatened, or Endangered in California, but more FT = Federally Threatened common elsewhere SE = State Endangered 3=Need more information (a Review List) ST = State Threatened 4=Plants of Limited Distribution (a Watch List) SR = State Rare SSC = CDFW Species of Special Concern **CRPR Threat Code Extension** .1=Seriously endangered in California (> 80% of occurrences WL = CDFW Watch List

G-Rank/S-Rank = Global Rank and State Rank as per NatureServe

and CDFW's CNDDB Rarefind 5

threatened/high degree and immediacy of threat)

threatened)

threatened)

.2=Fairly endangered in California (20-80% occurrences

.3=Not very endangered in California (<20% of occurrences

2-12

Attachment 3

Site Photographs



Photograph 1. South view of ornamental palms, project site and Mulberry Drive.



Photograph 2. West view of project site, ornamental trees to the north, and Cox Road.



Photograph 3. North view of mature Mexican fan palms, project site, and Mulberry Drive.



Photograph 4. West view of ornamental trees, concrete v-ditch, and project site.



Photograph 5. Representative view of project site, facing north.



Photograph 6. Representative view of project site, facing northwest.



Photograph 7. View of isolated disturbed wetland feature with southern cattail, facing west.



Photograph 8. Southeast view of project site, drainage, and concrete v-ditch.



Photograph 9. South view of project site and western fence line.



Photograph 10. North view of existing, disturbed non-native vegetation in center of project site.



Photograph 11. Southwest view of existing, disturbed non-native vegetation in center of project site.



Photograph 12. Southeast view of corner of project site, ornamental and sycamore trees, and public sidewalk along Cox Road.



Photograph 13. Updated north view of corner of project site, showing the recent discing on the project site.



Photograph 14. Updated view of isolated disturbed wetland feature where rip-rap replaced southern cattail, facing west.



Photograph 15. Updated southeast view of project siteand concrete v-ditch.



Photograph 16. Updated northeast view of project site, and underground culvert outlet.



Photograph 17. Updated south view of concrete grated culvert where all three features convey flow.