



An Employee-Owned Company

November 21, 2025

Mr. David Stearn
The True Life Companies
4350 Von Karman Avenue, Suite 200
Newport Beach, CA 92660

Reference: Biological Resources Letter Report for the Cleveland Avenue Residential Project, Escondido, California
(RECON Number 10600.1)

Dear Mr. Stearn:

This report summarizes the biological resources survey methods and results, assessment of potential impacts to biological resources, and recommended avoidance and minimization measures for the Cleveland Avenue Residential Project (project).

1.0 PROJECT DESCRIPTION

The project is located in the northern portion of the city of Escondido, approximately 1.5 miles east of Interstate 15 (Figure 1). The project is located within Rincon Del Diablo Land Grant of the U.S. Geological Survey 7.5-minute topographic map, Valley Center quadrangle (Figure 2). The 10.38-acre project site is located on assessor parcel number 224-151-51-00, immediately northeast of the intersection of Cleveland Avenue and Conway Drive (Figure 3). The project would develop 29 residential units (26 market rate and 3 affordable) with an internal access road connecting to both Cleveland Avenue and Conway Drive. All construction activities and temporary staging areas would be located within the 10.38-acre project parcel.

2.0 REGULATORY CONTEXT

2.1 Multiple Habitat Conservation Plan

This report provides the necessary biological data and background information required for environmental analysis by the California Environmental Quality Act (CEQA) and is consistent with the Final Multiple Habitat Conservation Program (MHCP; San Diego Association of Governments [SANDAG] 2003), which is an approved Subregional Natural Community Conservation Plan/Habitat Conservation Plan document for the seven cities in north San Diego County. The project site is within the boundaries of the City of Escondido's (City) Subarea Plan, which is currently in draft (City of Escondido 2001). The City's draft Subarea Plan identifies a series of focused planning areas (FPAs), which are lands proposed to be preserved as habitat for the conservation of native wildlife and plant species. FPAs within the city include both hardline preserve areas, which are to be preserved as open space, and softline preserve areas, which will include both development and open space, to be determined through the planning process. The project site is not located within an FPA (Figure 4).

3.0 METHODS AND SURVEY LIMITATIONS

RECON biologists Chelsea Polevy and Katie Raffaini performed a general biological survey on April 9, 2025. A Crotch's bumble bee (CBB; *Bombus crotchii*) habitat assessment was also conducted at this time as necessitated by the species' recent listing as a candidate endangered species under the California Endangered Species Act (CESA). The biological survey area consisted of the entire project footprint with a 50-foot survey buffer, which collectively equal 13.61 acres (Figure 5). The survey was conducted from 10:00 a.m. to 12:55 p.m. and weather conditions ranged from 80 to 82 degrees Fahrenheit, with 0 percent cloud cover, and 0-to-1-mile-per-hour winds.

The biological survey area was visually assessed by foot, where possible, and inaccessible portions of the biological survey area were scanned using binoculars to provide complete visual coverage. Vegetation communities were mapped on high resolution aerial imagery using ArcGIS field maps. Wildlife species were observed directly or detected from calls or observations. All plant species observed during the survey were also noted.

Vegetation community classifications follow Holland (1986) as modified by Oberbauer et al. (2008). Scientific and common names of plants were primarily derived from the Jepson Online Interchange (Jepson Flora Project 2025). In instances where common names were not provided in this resource, common names were obtained from Rebman and Simpson (2014), the U.S. Department of Agriculture (USDA) maintained database (USDA 2013), or the *Sunset Western Garden Book* (Brenzel 2001). Nomenclature for invertebrates is in accordance with NatureServe 2025; for reptiles with Crother et al. (2017); for birds with Chesser et al. 2024; and for mammals with Bradley et al. (2014) and American Society of Mammalogists 2021.

The survey was conducted during the daytime to maximize visibility and detection of plants and most animals. Plant and animal species inventories were limited by seasonal and temporal factors, as well as noise levels from Cleveland Avenue and Conway Drive. To account for survey limitations, special-status plant and wildlife species that could occur based on species records, known ranges, and habitat preferences are analyzed herein based on their potential to occur.

A two-mile search radius was utilized for database review, which included the California Natural Diversity Database (CNDDb; California Department of Fish and Wildlife [CDFW] 2025a) and the All Species Occurrence Database (U.S. Fish and Wildlife Service [USFWS] 2025).

4.0 SURVEY RESULTS

4.1 Physical Characteristics/Setting

The approximately 10.38-acre project site is located within an urban environment, surrounded by residences and roads on all sides (see Figure 3). The parcel to the north of the project boundary is a private residence, which is characterized by both developed areas and undeveloped, non-native grassland. Soil types within the biological survey area include Fallbrook sandy loam, Greenfield sandy loam, Placentia sandy loam, and Reiff fine sandy loam. No clay or gabbro soils are present on-site. The site is gently sloped from the east to west side of the parcel. Elevations in the project site range from 762 feet above mean sea level to 794 feet above mean sea level.

The entire project site is completely outside an MHCP Softline or Hardline Preserve FPA (see Figure 4) The nearest Hardline Preserve FPA is located approximately 0.2 miles to the west and the nearest Softline Preserve FPA is approximately 0.4 miles to the east.

4.2 Vegetation Communities

Three vegetation communities/land cover types occur within the biological survey area: non-native grassland, non-native grassland: broadleaf-dominated vegetation, and developed land. (Table 1; see Figure 5). The majority of the project site is dominated by non-native grassland. A small disturbed area within the western portion of the project site consists of non-native grassland: broadleaf-dominated. The remaining project site consists of urban/developed land. A total of 26 plants were detected during the survey, 18 of which are non-native (69 percent). A complete list of the plant species identified within the project site is provided as Attachment 1.

Under the MHCP, environmentally sensitive lands are categorized into different habitat groups of sensitivity. Group A consists of wetland/riparian habitats, which are considered the most sensitive of habitats. Upland vegetation communities that are classified as Group B (rare uplands), Group C (coastal sage scrub), Group D (chaparral), and Group E (annual grassland) are considered sensitive by the MHCP. Group F (other lands), which includes disturbed lands, are not considered sensitive (SANDAG 2003). Non-native grassland and non-native grassland: broadleaf-dominated are considered sensitive habitats under the MHCP (Group E).

Table 1 Vegetation Communities and Land Cover Types within the Project Site and 50-Foot Survey Buffer				
Vegetation Communities and Land Cover Types by Oberbauer	MHCP Vegetation Community Classification	Habitat Group per the MHCP*	Total Acres within Project Site	Total Acres within 50-Foot Survey Buffer
Non-Native Grassland	Grassland	Annual grassland – Group E	10.13	0.84
Non-Native Grassland: Broadleaf- dominated	Grassland	Annual grassland – Group E	0.07	--
Urban/Developed	N/A	N/A	0.17	2.39
TOTAL			10.38**	3.23
*MHCP = Multiple Habitat Conservation Program				
**Numbers may not total due to rounding.				

Non-native Grassland (42200). Non-native grassland consists of a dense to sparse cover of annual, non-native grasses and forbs (Holland 1986). This is the dominant vegetation community within the project site, and dominant species on-site include ripgut grass (*Bromus diandrus*), wall barley (*Hordeum murinum*), greenstem filaree (*Erodium moschatum*), and long-beak filaree (*Erodium botrys*), some of which were flowering at the time of the survey. On-site, this vegetation community includes scattered native species, which are too few and widespread to form a distinct native habitat. These native species include common fiddleneck (*Amsinckia menziesii*), California buckwheat (*Eriogonum fasciculatum*), coyote bush (*Baccharis pilularis*), and broom baccharis (*Baccharis sarothroides*). These shrubs comprised less than 1 percent absolute cover on the project site.

Non-native Grassland: Broadleaf-dominated (42210). Non-native grassland: broadleaf-dominated is a subset of non-native grassland (42200) that is dominated by one or several non-native, invasive broadleaf species accounting for more the 50% of total vegetation cover (Oberbauer et al. 2008). This habitat type is often associated with disturbance, and occurs on-site within a small, disturbed area. On-site, this vegetation community is dominated by tumbleweed (*Salsola tragus*).

Urban/Developed (12000). Urban/developed areas consist of any land that has been constructed upon, containing permanent or semi-permanent structures, pavement or hardscape, or landscaped areas that are regularly maintained and/or irrigated (Oberbauer et al. 2008). Urban/developed land occurs as residential development, including ornamental vegetation and public roads within the 50-foot survey buffer (see Figure 4).

4.3 Wildlife

Twenty-one wildlife species were detected within the biological survey area. Wildlife species detected within the project site are those commonly found in urban areas. These species are listed in Attachment 2.

5.0 SENSITIVE RESOURCES

For purposes of this report, species will be considered sensitive if they are: (1) covered species or narrow endemic species under the MHCP (SANDAG 2003); (2) listed by state or federal agencies as threatened or endangered or are proposed for listing; (3) on California Rare Plant Rank 1B (considered endangered throughout its range) or California Rare Plant Rank 2 (considered endangered in California but more common elsewhere) of the CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS 2024); or (4) considered rare, endangered, or threatened by the State of California's CNDDB (CDFW 2025a, 2025b, 2025c) or local conservation organizations or specialists.

Noteworthy plant species are considered those that are on California Rare Plant Rank 3 (more information about the plants' distribution and rarity needed) and California Rare Plant Rank 4 (plants of limited distribution) of the CNPS Inventory. Sensitive vegetation communities are those identified in the MHCP (SANDAG 2003), Holland (1986), the Jepson Online Interchange (Chesser et al. 2024), or identified by the City (2001).

Federal Regulations: The federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered "take" under the ESA. Section 9(a) of the ESA defines "take" as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." The ESA is administered by the USFWS.

The federal Migratory Bird Treaty Act of 1918 (MBTA) was established to provide protection to the breeding activities of migratory birds throughout the U.S. The MBTA, which is enforced by USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations.

State Regulations: CEQA requires an environmental review for projects with potentially adverse impacts on the environment. Adverse environmental impacts are typically mitigated in accordance with state laws and regulations.

The California ESA is similar to the federal ESA in that it provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction.

Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.3 of the California Fish and Game Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs.

City of Escondido Regulations: As stated above, the City is in the process of preparing a Subarea Plan under the MHCP. The MHCP is a habitat conservation plan for the seven jurisdictional areas within the northern subregion of San Diego County, including Escondido (SANDAG 2003). Under the MHCP, the City has prepared a draft Subarea Plan that addresses land conservation issues (City of Escondido 2001). This draft Subarea Plan 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 "softline" areas, which will include both development and open space to be determined through the planning process. The project site is outside of any FPAs (see Figure 4).

The City has a tree protection ordinance that addresses “protected” trees and “mature” trees (Article 55 of the Municipal Code Section 33-1068.C, Vegetation Removal Permits). The ordinance defines protected trees as any oak (genus *Quercus*) which has a 10-inch or greater diameter at breast height (DBH), or any other species or individual specimen listed on the local historic register, or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code. A mature tree is defined as any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree (genus *Quercus*), shall have a diameter four inches or greater when measured at 4.5 feet DBH above the tree’s natural grade. All other mature trees shall have a diameter of eight inches DBH, or greater, for a single stem or one of the multiple stems (Municipal Code Section 33-1052, Definitions). Per the City Municipal Code Section 33-1068.C (2)(a), any mature tree that will be removed will be replaced at a 1:1 ratio and any protected tree that will be removed will be replaced at a 2:1 ratio. The preferred replacement is a tree(s) of equal size and caliper, per Section 33-1069 (b)(4).

Jurisdictional Waters: All wetland areas, including vernal pools and non-wetland waters of the U.S., are considered sensitive. Wetlands and non-wetland waters are under the jurisdiction of the U.S. Army Corps of Engineers. Streambeds and associated vegetation are under the jurisdiction of CDFW.

Assessments for the potential occurrence of sensitive species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDDB, and species occurrence records from other sites in the vicinity of the project site.

5.1 Sensitive Natural Communities

Two sensitive vegetation communities are present on the site: non-native grassland and non-native grassland: broadleaf-dominated. Both of these MHCP Group E vegetation communities are considered sensitive upland habitats.

5.2 Sensitive Plants

No sensitive or MHCP-covered plant species were identified or expected to occur within the project, based on a lack of habitat present. Sensitive plant species known to occur within two miles of the project site based on a database review are presented with an evaluation of their potential for occurrence in Attachment 3.

5.3 Sensitive Wildlife

No sensitive wildlife species were identified on-site during the biological survey. One sensitive species, Cooper’s hawk (*Accipiter cooperii*), has moderate potential to occur within the project site. Due to the presence of floral resources, it was originally determined that CBB has a moderate potential to occur on-site, and focused surveys for this species were conducted. Based on focused surveys conducted for CBB, which were negative, it was determined that there is low potential for this species to occur on-site. These species are discussed in detail below. Sensitive wildlife species known to occur within two miles of the project site based on a database review are presented with an evaluation of their potential for occurrence in Attachment 4.

CBB is a candidate endangered species under the CESA. CBB occurs within grasslands and shrublands, particularly in areas with abundant floral resources. They nest underground, occasionally within existing rodent burrows or debris piles (Hatfield et al. 2015). CBB was not observed on the site during focused surveys conducted in June and July of 2025. This species has a low potential to forage within the project site in the future given the limited availability of suitable floral resources on-site. While mammal burrows are present within the project boundary, it was determined

based on the focused surveys that there is a low potential for CBB to nest or overwinter on-site. The survey report for the CBB surveys is provided in Attachment 5 and provides additional details on the methods and results of the focused CBB surveys.

Cooper's hawk is a CDFW watch list species and is a MHCP-covered species. Cooper's hawk occurs in mature forest, open woodlands, wood edges, river groves, and parks/residential areas. They tend to hunt in broken woodland or at habitat edges, and nest in deciduous trees approximately 20 to 50 feet above the ground (CDFW 1990). There is moderate potential for this species to occur on-site because there is potential for this species to nest in neighboring trees and forage onsite, as discussed in Section 6.1.3.

5.4 Wildlife Corridors and Wildlife Nursery Sites

The project site does not currently function as a significant wildlife movement corridor as it is surrounded by residential development and roads, which ultimately restrict its use by wildlife. Other grassland dominated areas occur within the vicinity of the project site, including within the parcel directly to the north. However, these areas are fragmented by development and do not comprise a continuous wildlife corridor. The Daley Ranch Preserve, which is approximately 0.9 miles east of the project site, is a contiguous block of habitat comprising approximately 3,000 acres that provides habitat for many avian species, some of which may use the project site for foraging. Movement of other terrestrial wildlife from the Daley Ranch Preserve to the project site is restricted by the surrounding development. Riparian hardline preserve land occurs approximately 0.4 miles southwest of the project site along Reidy Creek, and this riparian vegetation has potential to support least bell's vireo (*Vireo bellii pusillus*). However, suitable habitat does not occur on-site for least bell's vireo, and it is unlikely to use the project site for foraging or dispersal.

5.5 Mature and Protected Trees

There are trees within neighboring private residences, but no trees occur within the project boundary; thus, no trees defined as mature or protected occur within the proposed project footprint. Therefore, the project would not impact mature or protected trees.

6.0 IMPACTS

6.1 Direct Impacts

6.1.1 Vegetation Communities

The project would convert the entire 10.38-acre project site to residential uses, permanently impacting 10.13 acres of non-native grassland, 0.07 acres of non-native grassland: broadleaf-dominated, and 0.17 acres of developed land (Table 2; see Figure 5). Non-native grassland and non-native grassland: broadleaf-dominated are categorized as MHCP Habitat Group E Annual Grassland group and are considered sensitive vegetation communities (SANDAG 2003). Implementation of mitigation measure BIO-1 for habitat-based mitigation presented in Section 7.0 below would reduce impacts on sensitive vegetation communities to a level less than significant. Impacts to urban/developed land would not be considered significant. The project would not result in any off-site impacts.

Table 2 Impacts to Vegetation Communities/Land Cover Types (acres)			
Habitat Type	MHCP Group	Existing On-site	Permanent Impacts
Non-native Grassland	Group E. Annual Grassland	10.13	10.13
Non-native Grassland: Broadleaf-dominated		0.07	0.07
Urban/Developed	N/A	0.17	0.17
TOTAL		10.38	10.38
MHCP = Multiple Habitat Conservation Program			

6.1.2 Sensitive Plants

As previously stated, several sensitive plant species have potential to occur within two miles of the project site. However, these species were not observed on-site during the biological survey, and they are not expected to occur on-site (see Attachment 3). Therefore, the project is not expected to impact sensitive plant species.

6.1.3 Sensitive Wildlife

As noted above, there is a low potential for CBB to occur on-site. During the surveys, CBB was not observed but flowering resources on which CBB could forage were present. Flowering plants observed included common fiddleneck, greenstem filaree, long-beak filaree, orchard morning-glory (*Convolvulus arvensis*), smooth cat's-ear (*Hypochaeris glabra*), small-flower catchfly (*Silene gallica*), wild radish (*Raphanus raphanistrum*), and Bermuda buttercup (*Oxalis pes-caprae*). Additionally, existing rodent burrows and debris piles on-site may provide nesting habitat for CBB. Direct impacts to this species could occur if floral resources on which this species is foraging are removed, trimmed, or trampled during project work activities conducted during the Colony Active Period (April 1 and August 31). These impacts would be significant, absent mitigation. One preconstruction focused survey would be required to verify the presence or absence of CBB immediately prior to construction, in accordance with mitigation measure BIO-3, below.

As previously stated, Cooper's hawk has a moderate potential to occur on-site. During the initial survey, trees taller than 10 feet (primarily ornamental) were observed on neighboring properties, which have potential to support nesting for this species. No direct impacts to nesting Cooper's hawks are expected on-site, but indirect impacts due to construction noise may impact individuals nesting in off-site trees. Additionally, the proposed project may result in loss of foraging habitat for Cooper's hawk. Impacts to Cooper's hawk would be considered significant. Implementation of mitigation measure BIO-1 for habitat-based mitigation of sensitive natural communities (i.e., non-native grassland and non-native grassland: broadleaf-dominated) and BIO-2 for avian protection requirements would reduce impacts on Cooper's hawk to a level less than significant.

6.1.4 Migratory Birds and Raptors

Grading and vegetation removal, noise, night lighting, and human presence from construction activities are expected to impact potential nesting activity, which may include birds nesting in neighboring trees, or ground-nesting birds within the project site. Trees occur within neighboring private residences, but no trees occur within the project boundary. As such, no direct removal of trees is anticipated as a result of project construction.

Migratory birds and raptors and their nests are protected under the MBTA and California Fish and Game Code Sections 3503 and 3503.5. Project construction could result in nest abandonment, which would result in direct take of eggs or chicks, as well as impacts to foraging birds or raptors utilizing the project site. Implementation of mitigation measure BIO-2 for avian protection requirements presented in Section 7.0 below would reduce impacts on migratory birds and raptors to a level less than significant. Additionally, habitat-based mitigation for sensitive natural communities under mitigation measure BIO-1 would further minimize impacts to nesting birds and foraging raptors resulting from habitat loss.

6.1.5 Impacts in the Multiple Habitat Conservation Program Hardline Preserve Areas

The project site is not within a MHCP Softline or Hardline Preserve FPA (see Figure 5). Therefore, no direct or indirect impacts will occur to the MHCP FPAs as a result of the project.

6.2 Indirect Impacts

6.2.1 Noise

Construction of the project would create a temporary noise disturbance. Noise, as a result of the construction activities, may impact avian species utilizing non-native grassland or trees adjacent to the project area. As previously stated, indirect impacts such as noise could result in impacts to nesting birds, including nest abandonment. However, these impacts are expected to be temporary, and adherence to avian protection requirements under mitigation measure BIO-2 presented in Section 7.0 below would prevent permanent direct impacts (i.e., mortality).

6.2.2 Dust Deposition

Project construction would generate dust that may temporarily disturb species in proximity to the project site. However, the San Diego Air Pollution Control District regulates fugitive dust emissions, particularly from construction sites, through Rule 55, which limits dust emissions crossing property lines. Adherence to these dust control measures would reduce impacts in proximity to the project site to a level less than significant.

7.0 MITIGATION

Mitigation is required for project impacts that are considered significant under the CEQA, including impacts to sensitive vegetation communities (habitats) or species. All impacts to sensitive biological resources should be avoided to the maximum extent feasible and minimized prior to proposing mitigation whenever possible. Mitigation is intended to reduce the impacts to a level of less than significant.

BIO-1 Sensitive Upland Vegetation

The project would permanently impact 10.13 acres of non-native grassland and 0.07 acres of non-native grassland: broadleaf-dominated vegetation, which are categorized as Group E Annual Grassland habitat. Table 3 provides the acreage of mitigation required per the mitigation ratios outlined in the MHCP (SANDAG 2003). Mitigation may occur through the following two options: (1) purchase non-native grassland credits at Daley Ranch Conservation Bank, an approved mitigation bank, if available; or (2) if non-native grassland credits are not available, then preservation of non-native grassland habitat at an off-site location within a FPA may occur (SANDAG 2003).

Table 3 Mitigation for Permanent Impacts to Upland Vegetation Communities/Land Cover Types				
Habitat Type	MHCP Group	Permanent Impacts (acres)	Mitigation Ratio	Mitigation Required (acres)
Non-native grassland	Group E. Annual Grassland	10.13	0.5:1	5.07
Non-native Grassland: Broadleaf-dominated		0.07	0.5:1	0.03
Developed land	N/A	0.17	--	0
TOTAL		10.38	--	5.10

BIO-2 Avian Protection Requirements

To remain in compliance with the Migratory Bird Treaty Act and California Fish and Game Code 3503, no direct impacts shall occur to any nesting birds or their eggs, chicks, or nests during the breeding season. This project may directly impact nesting birds on or adjacent to the property if construction occurs during the typical breeding season for birds and raptors (January 1 to September 15). While no trees occur within the project boundary, mature trees occur within 150 feet on all sides of the proposed project footprint. Additionally, there is potential for ground nesting birds to nest within the project footprint. The following measures are recommended to avoid or mitigate potential impacts to nesting birds:

To avoid impacts to nesting birds and raptors, it is recommended that project construction occur outside of the breeding season. If construction must occur within the bird breeding season, a qualified biologist shall determine if any active bird or raptor nests occur on or in the immediate vicinity of the project. The entire project footprint as well as a 150-foot buffer shall be surveyed for nesting birds and raptors, where access allows. If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of a temporal avoidance buffer.

Surveys shall be conducted at the appropriate time of day, no more than three days (72 hours) prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be avoided using an avoidance buffer of sufficient distance that no harassment or harm occurs to the nesting pair or its chick/eggs. A qualified biologist shall make the determination for the avoidance buffer distance considering the species tolerance for human disturbance and through regular monitoring checks to ensure the avoidance buffer is sufficiently large to avoid harm to the nest. If regular biological monitoring by an biological monitor does not occur, the nest shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 15 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breeding season (January 1 to September 15) to avoid direct or indirect (noise) take of listed species.

BIO-3 Crotch's Bumble Bee Take Avoidance

A preconstruction focused survey would be required to verify the presence or absence of Crotch's bumble bee at the time of construction as described below. Prior to the Notice to Proceed for any construction permits, including but

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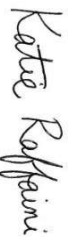
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not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the City of Escondido's Development Services Department shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction plans:

- A. To avoid impacts to Crotch's bumble bee, removal, trimming, or trampling of habitat in the proposed area of disturbance should occur outside of the Colony Active Period between April 1 and August 31. If removal of floral resources must occur during the Colony Active Period, a Qualified Biologist shall conduct one pre-activity survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.
- B. The pre-activity survey must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023). The Qualified Biologist should hold the appropriate authorization (e.g., Memorandum of Understanding) for capture/handling if necessary for identification. The pre-activity survey shall be conducted within 7 days of the start of removal, trimming or trampling of habitat and within 50 feet of project work resulting in removal, trimming or trampling of habitat.
- C. If the pre-activity survey does not identify Crotch's bumble bee individuals on-site during the Colony Active Period based on surveys described above, removal of floral resources can proceed within the Colony Active Period without further avoidance measures.
- D. If the pre-activity survey does identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify CDFW and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. Take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (California Fish and Game Code Sections 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, Section 786.9) under the CESA.

If you have any questions or require further information, please contact me at kraffaini@reconenvironmental.com.

Sincerely,



Katie Raffaini
Assistant Biologist

KAR:sh

Attachments

8.0 REFERENCES CITED

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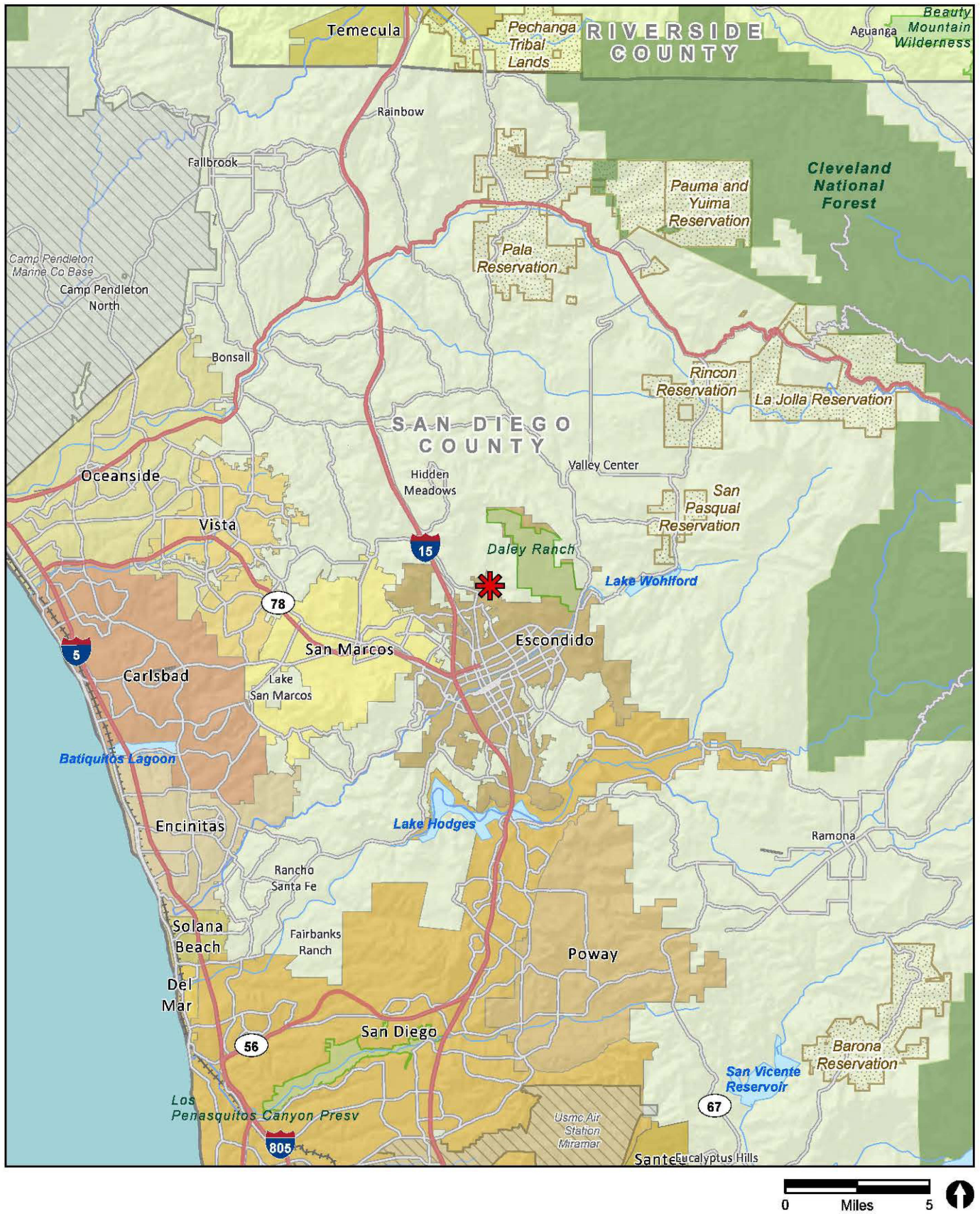
Mr. David Stearn
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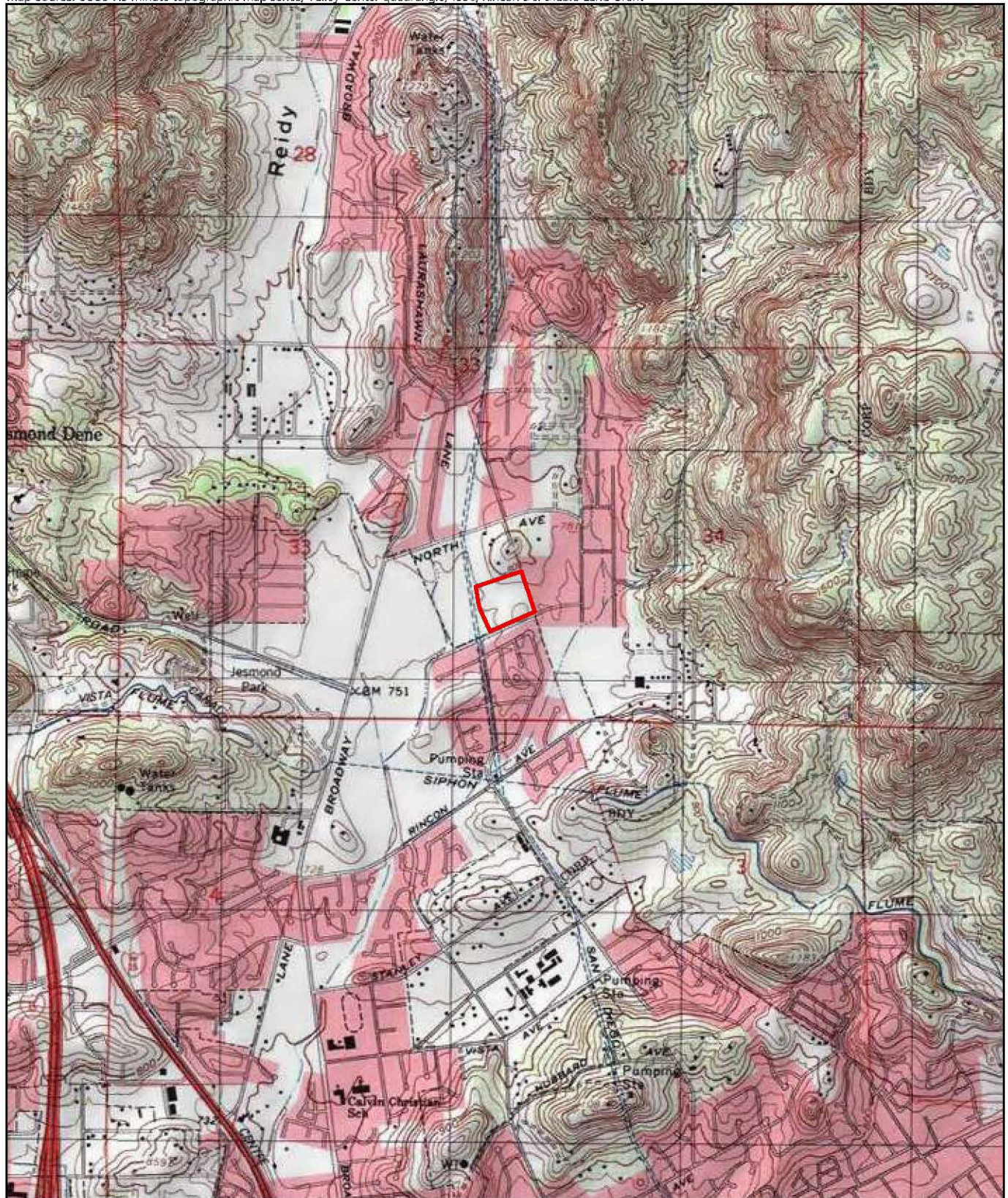
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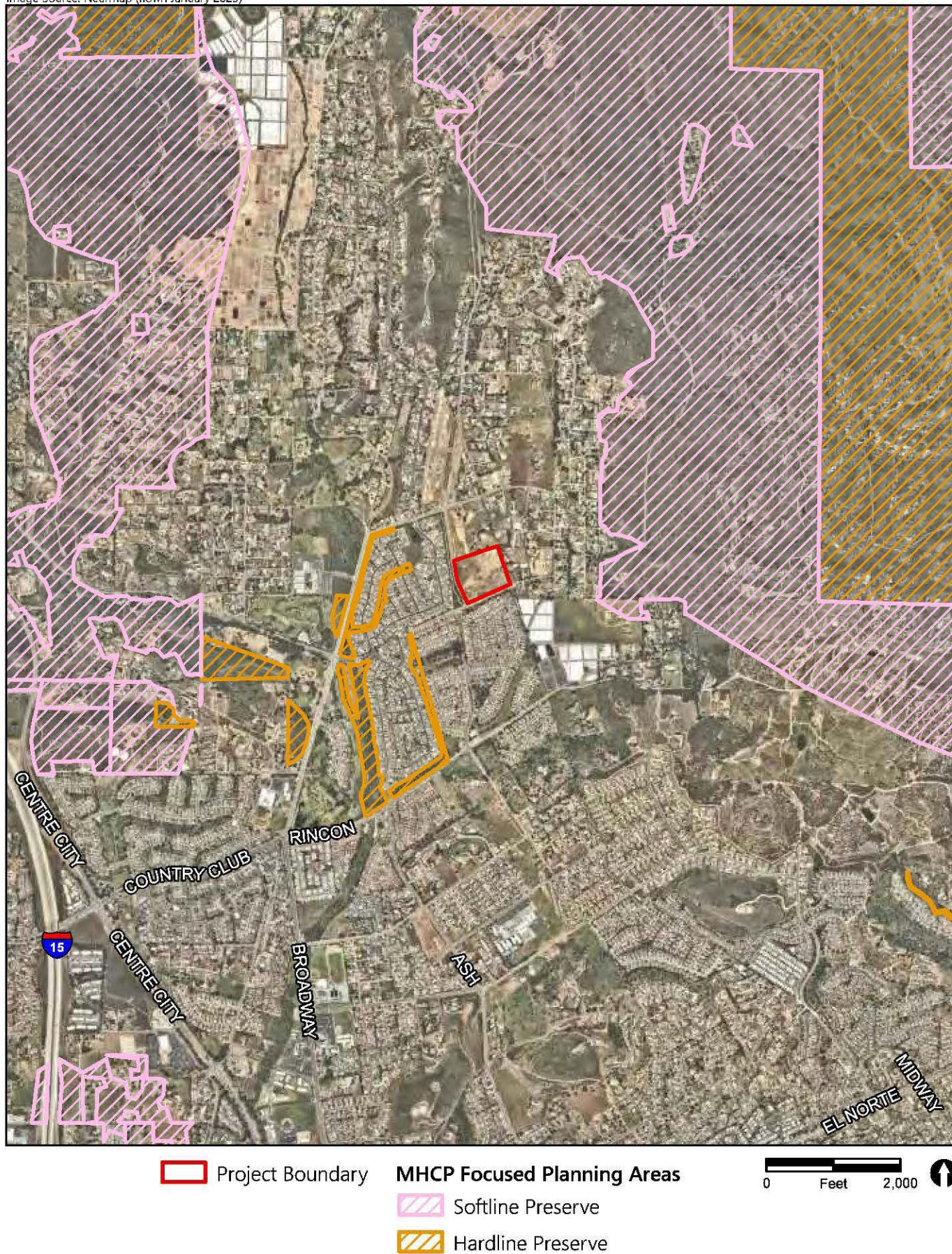


0 Feet 2,000

Project Boundary



 Project Boundary





Project Boundary
50-ft Survey Area

Vegetation Communities

Non-native Grassland
Non-native Grassland: Broadleaf-Dominated
Urban/Developed

0 Feet 200

RECON

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FIGURE 5
Biological Resources

ATTACHMENTS

ATTACHMENT 1

Plant Species Observed

Attachment 1 Plant Species Observed				
Major Plant Group	Family	Scientific Name	Common Name	Origin
Angiosperms: Monocots	Poaceae (Gramineae) / Grass Family	<i>Avena</i> sp.	oats	I
		<i>Bromus diandrus</i>	ripgut grass	I
		<i>Cynodon dactylon</i>	Bermuda grass	I
		<i>Hordeum murinum</i>	wall barley	I
		<i>Stipa pulchra</i> [= <i>Nassella pulchra</i>]	purple needle grass	N
Angiosperms: Eudicots	Asteraceae / Sunflower Family	<i>Ambrosia psilostachya</i>	western ragweed	N
		<i>Baccharis pilularis</i>	chaparral broom, coyote brush	N
		<i>Baccharis sarothroides</i>	broom baccharis	N
		<i>Heterotheca grandiflora</i>	telegraph weed	N
		<i>Hypochaeris glabra</i>	smooth cat's-ear	I
		<i>Sonchus asper</i> ssp. <i>asper</i>	prickly sow thistle	I
		<i>Sonchus oleraceus</i>	common sow thistle	I
	Boraginaceae / Borage Family	<i>Amsinckia menziesii</i>	common fiddleneck, small-flowered fiddleneck, rancher's fireweed	N
	Brassicaceae (Cruciferae) / Mustard Family	<i>Hirschfeldia incana</i>	short-pod mustard	I
		<i>Raphanus sativus</i>	radish	I
	Caryophyllaceae / Pink Family	<i>Silene gallica</i>	small-flower catchfly, windmill pink	I
	Chenopodiaceae / Goosefoot Family	<i>Salsola tragus</i>	Russian thistle, tumbleweed	I
	Convolvulaceae / Morning-Glory Family	<i>Convolvulus arvensis</i>	bindweed, orchard morning-glory	I
	Euphorbiaceae / Spurge Family	<i>Croton setiger</i> [= <i>Eremocarpus setiger</i>]	turkey-mullein, dove weed	N
	Fabaceae (Leguminosae) / Legume Family	<i>Medicago polymorpha</i>	California burclover	I
	Geraniaceae / Geranium Family	<i>Erodium botrys</i>	long-beak filaree	I
		<i>Erodium moschatum</i>	greenstem filaree	I
	Malvaceae / Mallow Family	<i>Malva parviflora</i>	cheeseweed, little mallow	I
	Oxalidaceae / Oxalis Family	<i>Oxalis pes-caprae</i>	Bermuda buttercup	I
	Plantaginaceae / Plantain Family	<i>Plantago lanceolata</i>	English plantain	I
	Polygonaceae / Buckwheat Family	<i>Eriogonum fasciculatum</i>	California buckwheat	N

NOTE: Scientific and common names were primarily derived from Jepson eFlora (Jepson Flora Project 2025). In instances where common names were not provided in this resource, common names were obtained from Rebman and Simpson (2014). Additional common names were obtained from the USDA maintained database (USDA 2023) or the *Sunset Western Garden Book* (Brenzel 2001), the Integrated Taxonomic Information System database (ITIS 2023), the Plant Finder (Missouri Botanical Garden 2023), or SelecTree (Urban Forest Ecosystems Institute at Cal Poly 2022) for ornamental/horticultural plants.

ORIGIN

N =Native to locality

I = Introduced species from outside locality

ATTACHMENT 2

Wildlife Species Observed

Attachment 2
Wildlife Species Observed

Major Wildlife Group	Family	Scientific Name	Common Name	Origin
Invertebrates	Apidae / Honey Bees, Bumble Bees, and Allies	<i>Apis mellifera</i>	honey bee	I
Reptiles	Phrynosomatidae / Spiny Lizards	<i>Sceloporus occidentalis longipes</i>	Great Basin fence lizard	N
Birds	Accipitridae / Hawks, Kites, & Eagles	<i>Buteo jamaicensis</i>	red-tailed hawk	N
		<i>Buteo lineatus</i>	red-shouldered hawk	N
	Picidae / Woodpeckers & Sapsuckers	<i>Melanerpes formicivorus</i>	acorn woodpecker	N
	Tyrannidae / Tyrant Flycatchers	<i>Myiarchus cinerascens</i>	ash-throated flycatcher	N
		<i>Sayornis nigricans</i>	black phoebe	N
		<i>Sayornis saya</i>	Say's phoebe	N
		<i>Tyrannus vociferans</i>	Cassin's kingbird	N
	Corvidae / Crows, Jays, & Magpies	<i>Corvus brachyrhynchos</i>	American crow	N
		<i>Corvus corax</i>	common raven	N
	Troglodytidae / Wrens	<i>Thryomanes bewickii</i>	Bewick's wren	N
	Mimidae / Mockingbirds & Thrashers	<i>Mimus polyglottos</i>	northern mockingbird	N
	Passerellidae / New World Passerines	<i>Chondestes grammacus</i>	lark sparrow	N
		<i>Melospiza melodia</i>	song sparrow	N
		<i>Melospiza</i> [=Pipilo] <i>crissalis</i>	California towhee	N
	Fringillidae / Finches	<i>Haemorhous</i> [=Carpodacus] <i>mexicanus</i>	house finch	N
		<i>Spinus</i> [=Carduelis] <i>psaltria</i>	lesser goldfinch	N
Mammals	Passeridae / Old World Sparrows	<i>Passer domesticus</i>	house sparrow	I
	Sciuridae / Squirrels & Chipmunks	<i>Otopermophilus</i> [=Spermophilus] <i>beecheyi</i>	California ground squirrel	N
	Geomyidae / Pocket Gophers	<i>Thomomys bottae</i>	Botta's pocket gopher	N

NOTE: Zoological nomenclature for invertebrates is in accordance with NatureServe 2025 and Evans 2008; for reptiles with Crother et al. (2017); for birds with Chesser et al. 2024; for mammals with Bradley et al. (2014), American Society of Mammalogists 2021.

ORIGIN

N =Native to locality.

I = Introduced species from outside locality.

ATTACHMENT 3

Sensitive Plant Species Observed or
with the Potential to Occur

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

Major Plant Group	Family	Scientific Name	Common Name	Federal Status	State Status	California Rare Plant Rank	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Angiosperms: Eudicots	Brassicaceae (Cruciferae) / Mustard Family	<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's peppergrass			4.3		Annual herb; coastal sage scrub, chaparral; blooms January–July; elevation less than 2,900 feet.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys
Angiosperms: Eudicots	Ericaceae / Heath Family	<i>Arctostaphylos rainbowensis</i>	Rainbow manzanita			1B.1		Evergreen shrub; chaparral; granitic outcrops, rocky Cieneba, Las Posas soil, Pala; blooms January–March; elevation 700–2,200 feet. California endemic. Known from San Diego and Riverside counties.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys
Angiosperms: Eudicots	Ericaceae / Heath Family	<i>Comarostaphylis diversifolia</i>	summer holly					Chapparal; blooms May- June; elevation 330–1,800 feet.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys
Angiosperms: Eudicots	Lamiaceae / Mint Family	<i>Acanthomintha ilicifolia</i>	San Diego thornmint	FT	SE	1B.1	MHCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; associated with vernal pools; blooms April–June; elevation less than 3,200 feet.	Unexpected	Unlikely to occur because project does not support clay soils required by this species; was not observed during habitat surveys

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

Major Plant Group	Family	Scientific Name	Common Name	Federal Status	State Status	California Rare Plant Rank	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Angiosperms: Eudicots	Rosaceae / Rose Family	<i>Horkelia truncata</i>	Ramona horkelia			1B.3		Perennial herb; cismontane woodland, chaparral; clay soils; blooms May–June; elevation 1,300–4,300 feet.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys
Angiosperms: Monocots	Themidaceae / Brodiaea Family	<i>Bloomeria clevelandii</i> [= <i>Muilla clevelandii</i>]	San Diego goldenstar			1B.1	MHCP	Perennial herb (bulbiferous); chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; clay soils; blooms May; elevation 170–1,500 feet.	Unexpected	Unlikely to occur because project does not support clay soils required by this species; was not observed during habitat surveys
Angiosperms: Monocots	Themidaceae / Brodiaea Family	<i>Brodiaea filifolia</i>	thread-leaved brodiaea	FT	SE	1B.1	MHCP	Perennial herb (bulbiferous); cismontane woodland, coastal sage scrub, valley and foothill grassland, vernal pools; clay soils; blooms March–June; elevation less than 2,850–3,675 feet. California endemic. Known from San Diego, Riverside, Orange, Los Angeles,	Unexpected	Unlikely to occur because project does not support clay soils required by this species; was not observed during habitat surveys

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

Major Plant Group	Family	Scientific Name	Common Name	Federal Status	State Status	California Rare Plant Rank	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
								and San Bernardino counties.		
Angiosperms: Monocots	Themidaceae / Brodiaea Family	<i>Brodiaea orcuttii</i>	Orcutt's brodiaea			1B.1	MHCP	Perennial herb (bulbiferous); closed cone coniferous forest, chaparral, meadows and seeps, valley and foothill grassland, vernal pools; mesic, clay soil; blooms May–July; elevation less than 5,600 feet.	Unexpected	Unlikely to occur because project does not support clay soils or vernal pools required by this species; was not observed during habitat surveys

NOTE: Scientific and common names were primarily derived from Jepson eFlora (Jepson Flora Project 2025). In instances where common names were not provided in this resource, common names were obtained from California Native Plant Society (CNPS; 2025). Federal and state listing status is based on CDFW 2025a. California Rare Plant Rank is from CNPS (2025).

STATUS CODES

Federal Status

FT = Listed as threatened by the federal government

State Status

SE = Listed as endangered by the state of California

California Native Plant Society (CNPS): California Rare Plant Ranks (CRPR)

1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.

4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.

0.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).

0.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known).

City of Escondido

MHCP = Multiple Habitat Conservation Program

ATTACHMENT 4

Sensitive Wildlife Species Observed or
with the Potential to Occur

Attachment 4

Sensitive Wildlife Species Observed or with the Potential to Occur

Major Wildlife Group	Family	Scientific Name	Common Name	Federal Status	State Status	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Invertebrates	Apidae / Honey Bees, Bumble Bees, and Allies	<i>Bombus crotchii</i>	Crotch's bumble bee		SCE		Coastal areas, open grasslands, shrub habitats.	Moderate	Moderate potential to occur because flowering resources comprised approximately 3 percent of the total vegetation cover at the time of the habitat survey, and existing rodent burrows and debris piles on-site may be used for nesting. Species was not observed during habitat surveys.
Amphibians	Scaphiopodidae / Spadefoots	<i>Spea hammondi</i>	western spadefoot	FPT	SSC	MHCP	Vernal pools, floodplains, and other temporary ponds or washes are required for breeding. Uses open areas within upland vegetation including mixed woodlands, grasslands, coastal sage scrub, and chaparral for foraging/burrowing.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.

Attachment 4

Sensitive Wildlife Species Observed or with the Potential to Occur

Major Wildlife Group	Family	Scientific Name	Common Name	Federal Status	State Status	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Reptiles	Phrynosomatidae / Spiny Lizards	<i>Phrynosoma blainvillii</i> [= <i>P. coronatum</i> coastal population], <i>Phrynosoma coronatum blainvillei</i>	Blainville's horned lizard, coast horned lizard, San Diego horned lizard		SSC		Chaparral, coastal sage scrub with fine, loose soil. Partially dependent on harvester ants for forage.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.
Reptiles	Teiidae / Whiptail Lizards	<i>Aspidoscelis hyperythra beldingi</i> [= <i>Cnemidophorus hyperythrus</i>]	Belding's orange-throated whiptail		WL	MHCP	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.
Reptiles	Teiidae / Whiptail Lizards	<i>Aspidoscelis tigris stejnegeri</i>	San Diegan tiger whiptail		SSC		Coastal sage scrub, chaparral, woodlands, and streamsides where plants are sparsely distributed.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.
Birds	Accipitridae/ Hawks, Kites, & Eagles	<i>Accipiter cooperii</i>	Cooper's hawk		WL	MHCP	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.	Moderate	Moderate potential to occur on-site because of potential for species to nest in neighboring trees and forage on-site; was not observed during habitat surveys.
Birds	Vireonidae / Vireos	<i>Vireo bellii pusillus</i>	least Bell's vireo	FE	SE	MHCP	Willow riparian woodlands. Summer resident.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.

Attachment 4

Sensitive Wildlife Species Observed or with the Potential to Occur

Major Wildlife Group	Family	Scientific Name	Common Name	Federal Status	State Status	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Birds	Poliophtidae / Gnatcatchers	<i>Poliophtila californica californica</i>	coastal California gnatcatcher	FT	SSC	MHCP	Coastal sage scrub, maritime succulent scrub. Resident.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.
Birds	Passerellidae / New World Passerines	<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow		WL		Coastal sage scrub, chaparral, with open grassland patches. Resident.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys. A known population of the species occurs on Daley Ranch Preserve, approximately 0.2 miles from the site, but is not expected to occur within the project area.
Birds	Icteridae / Blackbirds & New World Orioles	<i>Agelaius tricolor</i>	tricolored blackbird		ST, SSC		Freshwater marshes, agricultural areas, lakeshores, parks. Localized resident.	Unexpected	Unlikely to occur because project does not support suitable habitat for this species; was not observed during habitat surveys.
Mammals	Leporidae / Rabbits and Hares	<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit		SSC	MHCP	Open areas of scrub, grasslands, agricultural fields, with shrubs or small trees for cover.	Low	Low potential to occur because open grasslands are present onsite, but shrubs and small trees are not present; species was not observed during habitat survey

Attachment 4

Sensitive Wildlife Species Observed or with the Potential to Occur

Major Wildlife Group	Family	Scientific Name	Common Name	Federal Status	State Status	City of Escondido	Habitat Preference / Requirements	Potential to Occur On-Site	Basis for Determination of Occurrence Potential
Mammals	Cervidae /	<i>Odocoileus hemionus fuliginata</i>	Southern mule deer			MHCP	Woodlands, shrublands, meadows, grasslands, and riparian areas	Low	While potential suitable habitat occurs on-site, there is low potential for this species to occur due to the fragmented habitat and discontinuity from other patches of suitable habitat; species was not observed during habitat survey.

NOTE: Zoological nomenclature for invertebrates is in accordance with NatureServe 2025 and Evans 2008; for fish with NatureServe 2025; for reptiles and amphibians with Crother et al. (2017); for birds with Chesser et al. 2024; for mammals with Bradley et al. (2014) and American Society of Mammalogists 2021. Determination of the potential occurrence for listed, sensitive, or noteworthy species is based upon known ranges and habitat preferences for species follows Hatfield et al. 2015, Jennings and Hayes 1994, Unitt 2004, and Tremor et al. 2017. Federal and state listing status is based on CDFW 2025c.

STATUS CODES

Federal Status

FE = Listed as endangered by the federal government

FPT = Federally proposed threatened

FT = Listed as threatened by the federal government

State Status

SE = Listed as endangered by the state of California

ST = Listed as threatened by the state of California

SCE = State candidate for listing as Endangered

SSC = California Department of Fish and Wildlife species of special concern

WL = California Department of Fish and Wildlife watch list species

City of Escondido

MHCP = Multiple Habitat Conservation Program

ATTACHMENT 5

Crotch's Bumble Bee Survey Report



An Employee-Owned Company

November 21, 2025

Mr. Justin Garcia
Senior Environmental Scientist
California Department of Fish and Wildlife; Wildlife Branch
P.O. Box 944209
Sacramento, CA 94244-2090

Reference: Post-survey Notification of 2025 Crotch's Bumble Bee Focused Surveys for the Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600-1)

Dear Mr. Garcia:

This letter provides the California Department of Fish and Wildlife (CDFW) with the results of the habitat assessment and focused surveys for the California Endangered Species Act (CESA) Candidate Crotch's bumble bee (*Bombus crotchii*) conducted for the Cleveland Avenue Residential Project (project). The focused surveys are authorized through a Memorandum of Understanding (MOU) issued on May 17, 2024, by CDFW to Principal Investigator Wendy Loeffler (SC-182980003-19036-001). Other Independent Researchers authorized under the MOU include Alex Fromer (SC-192680001-19268-001), Anna Leavitt (SC-191060005-19106-001), Elizabeth Procsal (SC-190350007-19036-001), and Kathryn (Kayo) Valenti (SC-202320002-20245-001) with RECON Environmental, Inc. (RECON).

1.0 Project Location

The 10.38-acre project site is located on assessor parcel number 224-151-51-00 in the city of Escondido, east of Interstate 15 in northern Escondido (Figure 1). The project site is found on the U.S. Geological Survey 7.5-minute topographical map series, Valley Center quadrangle, Rincon Del Diablo Land Grant (U.S. Geological Survey 1996; Figure 2). The project site is immediately surrounded by residential development and is located northeast of the intersection of Conway Drive and Cleveland Avenue (Figure 3).

2.0 Methods

A habitat assessment and focused surveys for Crotch's bumble bee were conducted in accordance with the CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) and the MOU.

2.1 Habitat Assessment

The habitat assessment consisted of a database search and a site visit to evaluate the likelihood of Crotch's bumble bees to occur within the project site. Prior to the site visits, historical and current records of Crotch's bumble bee occurrence within two miles of the project site were evaluated by consulting the California Natural Diversity Database (CNDDb; CDFW 2025) and the citizen science data platform iNaturalist (2025).

RECON conducted a habitat assessment for foraging, nesting, and overwintering habitat on April 9, 2025. Due to the presence of annual, herbaceous species dominating the survey area, and thus the potential for seasonal variability, habitat was also assessed concurrently with focused surveys on June 2, June 25, and July 10, 2025. The habitat assessment area included the 10.38-acre project site and a 50-foot buffer (survey area; see Figure 3). The habitat assessment was conducted on-foot by meandering throughout the survey area. Developed and unvegetated areas

around the perimeter of the project boundary were excluded as not supporting suitable habitat or nectar resources resulting in a final survey area of 11.84 acres (Figure 4). RECON recorded potential foraging, nesting (e.g., bare ground, rodent burrows), and/or overwintering resources (e.g., leaf litter, woody forest edge); documented general plant diversity; and estimated the absolute percent cover of nectar sources.

2.2 Focused Surveys

A total of three survey visits were conducted within the entire 11.84-acre survey area on warm, sunny days, with low wind; began no earlier than one hour after sunrise; and were completed at least two hours before sunset. Survey dates, surveyors, times, and weather conditions are provided in Table 1, below.

Table 1 2025 Crotch's Bumble Bee Survey Dates, Personnel, Times, and Conditions					
Date	Survey #	Surveyor(s)	Beginning Conditions	Ending Conditions	Acres per Hour per Person
4/9/2025	Habitat Assessment	Chelsea Polevy	10:00 a.m.; 80°F; winds 0-1 mph; 0% cloud cover	12:55 p.m.; 82°F; winds 0-1 mph; 0% cloud cover	N/A
6/2/2025	1	Alex Fromer Katie Raffaini	11:45 a.m.; 80°F; winds 2-6 mph; 0% cloud cover	3:45 p.m.; 82°F; winds 1-4 mph; 0% cloud cover	1.5
6/25/2025	2	Alex Fromer	10:30 a.m.; 74°F; winds 2-3 mph; 0% cloud cover	3:00 p.m.; 81°F; winds 2-5 mph; 0% cloud cover	3
7/10/2025	3	Alex Fromer	9:00 a.m.; 73°F; winds 0-1 mph; 0% cloud cover	1:00 p.m.; 89°F; winds 1-3 mph; 0% cloud cover	3
°F = degrees Fahrenheit; mph = miles per hour					

Foraging surveys were conducted at a surveyor rate of 1.5-3 acres per hour which meets the survey protocol maximum rate of one person-hour of searching per 3 acres of suitable habitat, which does not include the time for capture or photographic documentation.

Prior to conducting the surveys, vials and nets were sterilized according to the methods described in the CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) and the MOU. During each survey, surveyors walked large meandering transects that incorporated patches of floral resources to capture bumble bees with a net from blooms, avoiding damaging the flower, when possible. Any bees captured ~~observed~~ are carefully transferred into its own sterile vial and kept at ambient temperature for no more than 10 minutes before being placed in a cooler on ice, at a temperature above 25 degrees Fahrenheit, for no more than 120 minutes. Photographs to capture the face, top of the head, banding on the abdomen, and color pattern on the thorax and hind leg for the bee netted would then be taken, with each photograph linked to the associated specimen using specimen numbers corresponding to the location of collection captured using a global positioning system (GPS) unit. All photographs of captured bees are then identified by a CDFW-approved taxonomist and archived for long-term storage.

Concurrent with foraging surveys, areas with potential nesting resources, identified during the habitat assessment, were systematically walked to try and detect nest activity (i.e., high levels of bee movements from a given location). Other pollinators and/or other bee use were also noted when encountered during the surveys.

3.0 Results

3.1 Habitat Assessment

Based on CNDDDB and iNaturalist records, no Crotch’s bumble bees have been observed within two miles of the survey area (CDFW 2025, iNaturalist 2025).

The survey area is within a vacant lot surrounded by residences and roads and is comprised of gently undulating topography. The following three vegetation communities/land cover types were mapped during the habitat assessment: non-native grassland, non-native grassland: broadleaf-dominated, and urban/developed (see Figure 4). Portions of the urban/developed areas, primarily consisting of roads and driveways, were excluded from the survey area based on a lack of available nectar, nesting, and/or overwintering resources.

The percent cover of nectar resources ranged from 0 to 1 percent within the areas mapped as non-native grassland and within some portions of the urban/developed land. These areas contained nectar resources such as bindweed (*Convolvulus arvensis*), short-pod mustard (*Hirschfeldia incana*), and white horse-nettle (*Solanum elaeagnifolium*). Representative photographs of the survey area are presented in Attachment 1.

Potential nesting resources for Crotch’s bumble bee, such as old mammal burrows and bare ground, were observed throughout the survey area. Overwintering resources are not currently well documented or defined (CDFW 2023). However, based on the information available, the survey area supports insulating grasses and duff within the non-native grassland that could potentially support overwintering of future queens (gynes). However, given the very low number of bumble bees detected during the surveys and low cover of nectar resources in the area, it is unlikely that bumble bees, including Crotch’s bumble bee, are using the site for nesting and overwintering.

3.2 Focused Surveys

One bumble bee was found foraging within the survey area and was collected on a patch of white horse-nettle in the southwest corner of the survey area. This bee was determined to be the common California bumble bee (*Bombus californicus*). Table 2 provides a summary of the bumble bee identifications. No bumble bee mortalities occurred during the surveys. The captured bee was processed in the vicinity of its capture and released in the shade and observed until it flew away.

Table 2 Results of the 2025 Crotch’s Bumble Bee Focused Surveys				
Survey #	Specimen Identification	Collection Date	Collection Method	Nectar Source/ Habitat
1	No bees observed/captured	6/2/2025	N/A	N/A
2	No bees observed/captured	6/25/2025	N/A	N/A
3	California bumble bee, <i>B. californicus</i> , worker	7/10/2025	Hand Net	Found in small patch of white horse-nettle (<i>Solanum elaeagnifolium</i>), surrounded by non-native grassland
N/A = not applicable				

No Crotch’s bumble bee were observed or captured during any of the three focused surveys. Honey bees (*Apis mellifera*) and various other wasp, hornet, and butterfly species were observed utilizing the sparse nectar sources present within the survey area.

Mr. Justin Garcia
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November 21, 2025

If you have any questions concerning the contents of this post-survey letter, please contact Alex Fromer at afromer@reconenvironmental.com.

Sincerely,



Wendy Loeffler
Environmental Program Manager/Senior Biologist

WEL:sh

Attachment

cc: Hillary Sardiñas, California Department of Fish and Wildlife
Kyle Rice, California Department of Fish and Wildlife
Hans Sin, California Department of Fish and Wildlife
WildlifeResearchPermits@wildlife.ca.gov
Suzanne Charnley, Land Forward CA, Inc.

References Cited

California Department of Fish and Wildlife (CDFW)

2023 Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6.

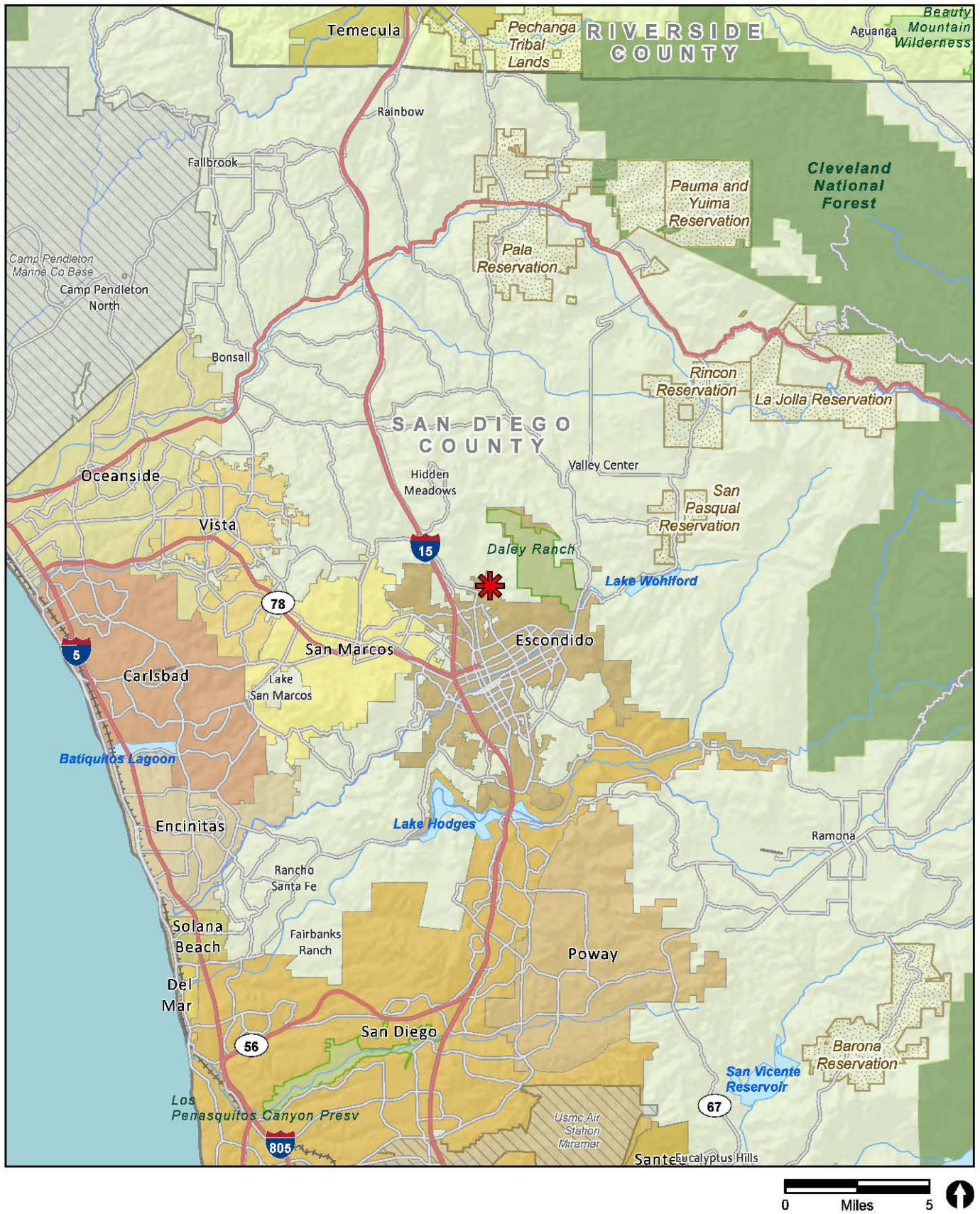
2025 California Natural Diversity Database, a Natural Heritage Program. Department of Fish and Wildlife, Biogeographic Data Branch, Sacramento.

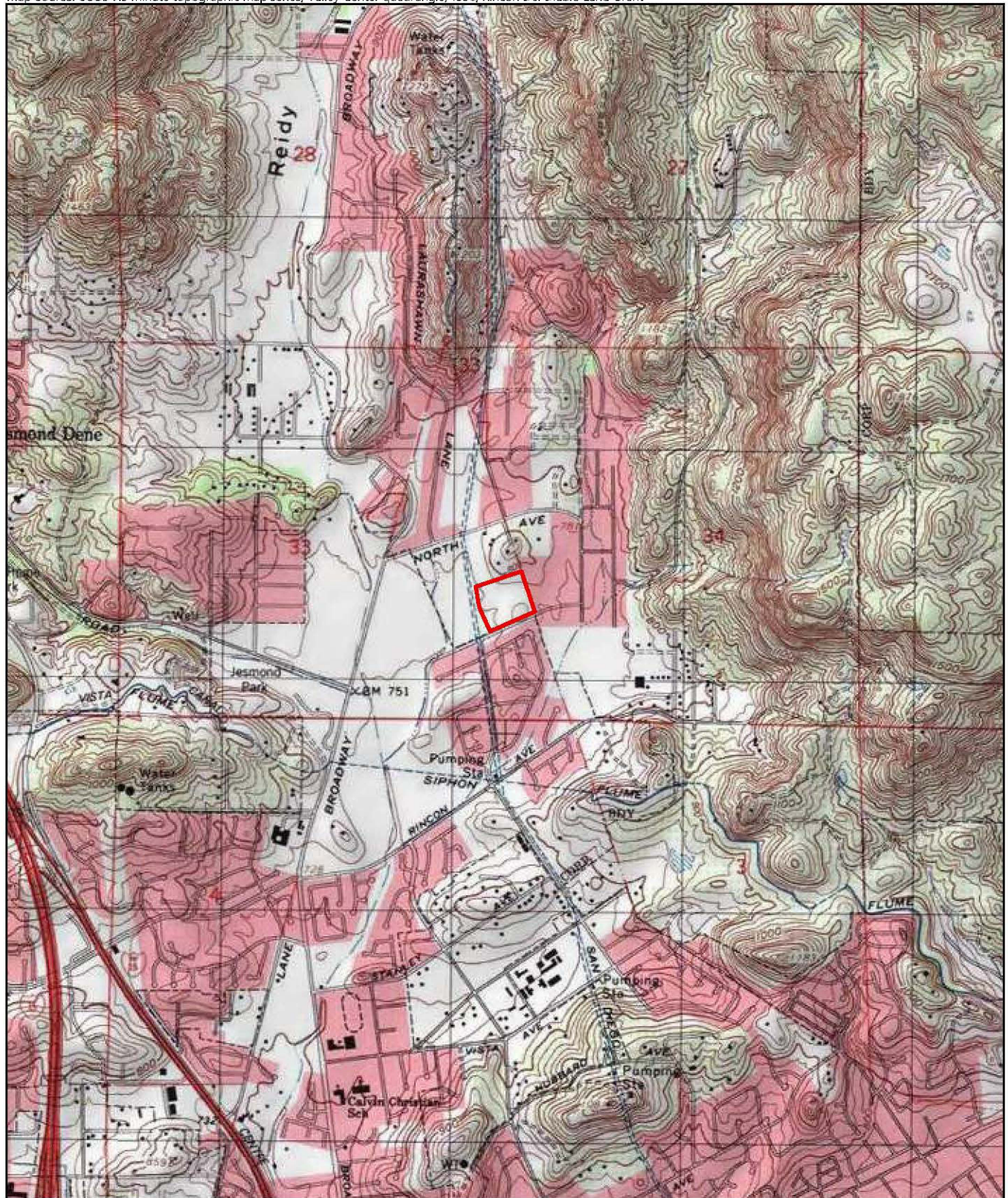
iNaturalist

2025 iNaturalist. <https://www.inaturalist.org/>. Accessed July.

U.S. Geological Survey (USGS)

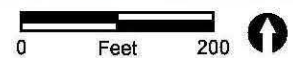
1996 Valley Center quadrangle, 7.5-minute Series Topographic Map.





0 Feet 2,000

Project Boundary



-  Project Boundary
-  Crotch's Bumble Bee Survey Area



- Project Boundary
- Crotch's Bumble Bee Survey Area
- Potential Nectar Resource Cover**
- 0-1%
- 0% - Excluded from Survey

Vegetation Communities

- Non-native Grassland
- Non-native Grassland: Broadleaf-Dominated
- Urban/Developed



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FIGURE 4
Crotch's Bumble Bee Habitat Assessment and Survey Results

ATTACHMENT 1

Representative Photographs of the Survey Area



PHOTOGRAPH 1
View of Non-Native Grassland Looking Northeast



PHOTOGRAPH 2
View of Non-Native Grassland Looking Southwest