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February 13, 2026

Mr. Joe DeHoyos
Project Manager
Z Global
750 West Main Street
El Centro, CA 92243

Reference: Burrowing Owl Habitat Assessment for the Rio Vista Apartments Project (RECON Number 10631)

Dear Mr. DeHoyos:

This letter summarizes the results of the burrowing owl (*Athene cunicularia*) habitat assessment for the Rio Vista Apartments Project (project) located off West River Road and North Rio Vista Avenue in the northwestern portion of the city of Brawley in Imperial County, California (Figure 1). The project occurs within Township 13 South, Range 14 East of the U.S. Geological Survey (USGS) 7.5-minute topographic map, Brawley quadrangle (USGS 1979; Figure 2).

RECON Environmental, Inc. (RECON) biologists conducted a habitat assessment in accordance with the guidelines developed by the California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFW 2012). The habitat assessment was conducted to determine the likelihood of the species occurring within the project site and a 500-foot buffer. No burrowing owl individuals or burrowing owl sign were detected within the project site or 500-foot buffer; however, suitable habitat and one potentially suitable burrow was observed. A discussion of the methods and results of the habitat assessment is provided below.

SURVEY METHODS

RECON biologists Katie Raffaini and Chelsea Poley conducted a habitat assessment in accordance with the guidelines developed by CDFW (2012). For the purposes of this report, the “burrowing owl survey area” includes the project’s proposed ground disturbance footprint (project site) and a 500-foot buffer (Figure 3). Biologists walked the project site to identify the presence of suitable habitat, which is characterized by low-growing or open vegetation with potential to support natural burrows and/or suitable man-made structures (such as rock debris piles). The 500-foot buffer within the burrowing owl survey area was visually examined for suitable habitat from the project site boundary using binoculars as access to the adjacent private property was not granted. The survey date, time, and weather conditions are provided in Table 1.

Table 1 Survey Information				
Date	Survey Type	Surveyors	Beginning Conditions	Ending Conditions
6/10/2025	Burrowing Owl Habitat Assessment	K. Raffaini, C. Poley	9:30 a.m.; 88°F; 0-3 mph; 0% cc	12:15 p.m.; 99°F; 0-3 mph; 0% cc
°F = degrees Fahrenheit; mph = miles per hour; % = percent; cc = cloud cover.				

SURVEY RESULTS

The burrowing owl survey area supports four vegetation communities/land cover types: disturbed land, urban/developed land, iodine bush scrub, and arrow-weed thickets (see Figure 3; Photographs 1–4). The acreages of these vegetation communities/land cover types are listed below in Table 2.

Table 2 Vegetation Communities/Land Cover Types within the Project Site and Survey Areas (Acres)			
Vegetation Communities	Project Site	500-Foot Buffer	Burrowing Owl Survey Area (Project Site Plus 500-Foot Buffer)
Iodine Bush Scrub	--	7.02	7.02
Arrow Weed Thickets	--	0.99	0.99
Disturbed Land	3.61	15.06	18.67
Urban/Developed Land	4.25	29.40	33.65
TOTAL	7.87¹	52.47	60.33
¹ Totals may differ due to rounding.			

Iodine bush scrub is a vegetation community dominated by iodine bush (*Allenrolfea occidentalis*) in the scrub canopy, with no other species with greater or equal cover (CNPS 2025). It is typically found within dry lakebed margins and playas. This vegetation community is only found within the 500-foot buffer (see Photograph 3). This vegetation community consists primarily of iodine bush, with scattered four-wing salt bush (*Atriplex canescens*) and salt cedar (*Tamarix ramosissima*).

Arrow weed thickets is a vegetation community dominated by arrow-weed (*Pluchea sericea*), with no other species of equal or greater cover in the shrub canopy. This vegetation community is found around seeps, springs, and irrigation ditches (CNPS 2025). This vegetation community is only found within the 500-foot buffer in the northwest corner. Arrow-weed was the only species observed within this community, which comprised a relatively small area of one acre.

The disturbed land consists of primarily unvegetated areas and includes scattered bush piles and an old agricultural field. Some sparse vegetation is present and includes scattered four-wing saltbush, Bermuda grass (*Cynodon dactylon*), and nettle-leaf goosefoot (*Chenopodium murale*). Disturbed land within the 500-foot buffer also includes scattered brush piles and an old agricultural field.

The urban/developed land consists of graded lots, equestrian features, residential areas, paved and unpaved roads, public park land, and ornamental vegetation including Mexican fan palm (*Washingtonia robusta*), salt cedar, and gum tree (*Eucalyptus* sp.) (see Photographs 1, 2, and 4). This land cover type occupies the largest proportion of both the project site and the 500-foot buffer.

All vegetation communities/land cover types within the burrowing owl survey area have the potential to support burrowing owl due to the presence of areas with low-lying and sparse vegetation. In addition, one suitable rodent burrow was detected in the northeast portion of the burrowing owl survey area (see Figure 3). However, no burrowing owl individuals, sign of burrowing owl activity, or burrow complexes were detected during the habitat assessment.

CONCLUSIONS AND MITIGATION REQUIREMENTS

Burrowing owl is not expected to occur within the project site due to lack of suitable habitat, burrows, burrow surrogates, or complexes. However, due to the presence of one potentially suitable rodent burrow in the 500-foot buffer and areas of low-lying and sparse vegetation, there is low potential for burrowing owl to occur within the 500-foot buffer. Were this species to subsequently colonize the project site, potential direct impacts to this species would be significant, and implementation of avoidance and minimization measure BIO-1 would reduce potential direct and indirect impacts to burrowing owls to a level less than significant.

BIO-1: Prior to any vegetation clearing, grading, or construction, a preconstruction take-avoidance survey shall be conducted within the project footprint plus a 500-foot buffer. Per the Staff Report on Burrowing Owl Mitigation (CDFW 2012), take avoidance surveys require an initial survey no less than 14 days prior to the start of ground disturbance activities and a final survey conducted within 24 hours of ground disturbance. If burrowing owls are detected, a Qualified Biologist shall notify and consult with CDFW to determine appropriate avoidance measures.

If active burrowing owl burrows are identified within the potential impact area, the project shall avoid disturbing active burrowing owl burrows (nesting sites) and burrowing owl individuals. Buffers shall be established around occupied burrows in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) based on the proposed level of disturbance. For low disturbance projects, initial setback distances for avoidance of active burrows shall be 200 meters (approximately 656 feet) from April 1 to October 15 and 50 meters (164 feet) from October 16 to March 31. Exceptions can be made to the avoidance distance for areas with natural (hills, trees) or artificial (buildings, walls) barriers in place. The final avoidance buffer shall be at the discretion of the Qualified Biologist in consultation with CDFW. If, after consideration of a reduced buffer, an adequate avoidance buffer cannot be provided between an occupied burrow and required ground-disturbing activities, then passive relocation activities during the non-breeding season (September 1 through January 31) may be authorized in consultation with CDFW, which would include preparation, approval, and implementation of a Burrowing Owl Exclusion Plan in accordance with the protocol described in the CDFW Staff Report on Burrowing Owl Mitigation and an Incidental Take Permit may be required per California Endangered Species Act Section 2081 at the discretion of CDFW.

If you have any questions concerning the contents of this letter, please feel free to contact me at 619-308-9333, ext. 145, or at kraffaini@reconenvironmental.com.

Sincerely,



Katie Raffaini
Biologist

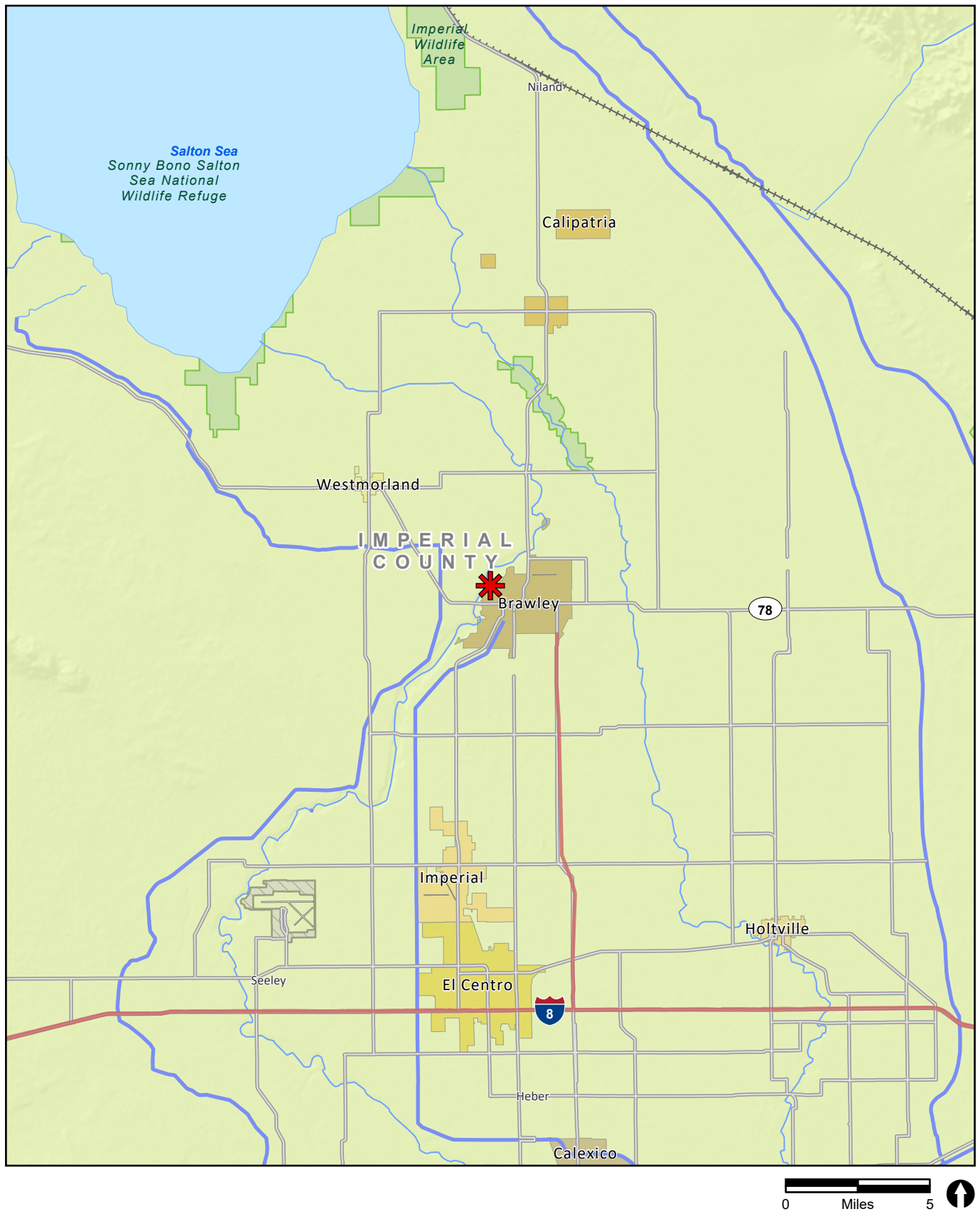
KAR:sjg

REFERENCES CITED

California Department of Fish and Wildlife (CDFW)
2012 Staff Report on Burrowing Owl Mitigation. March.

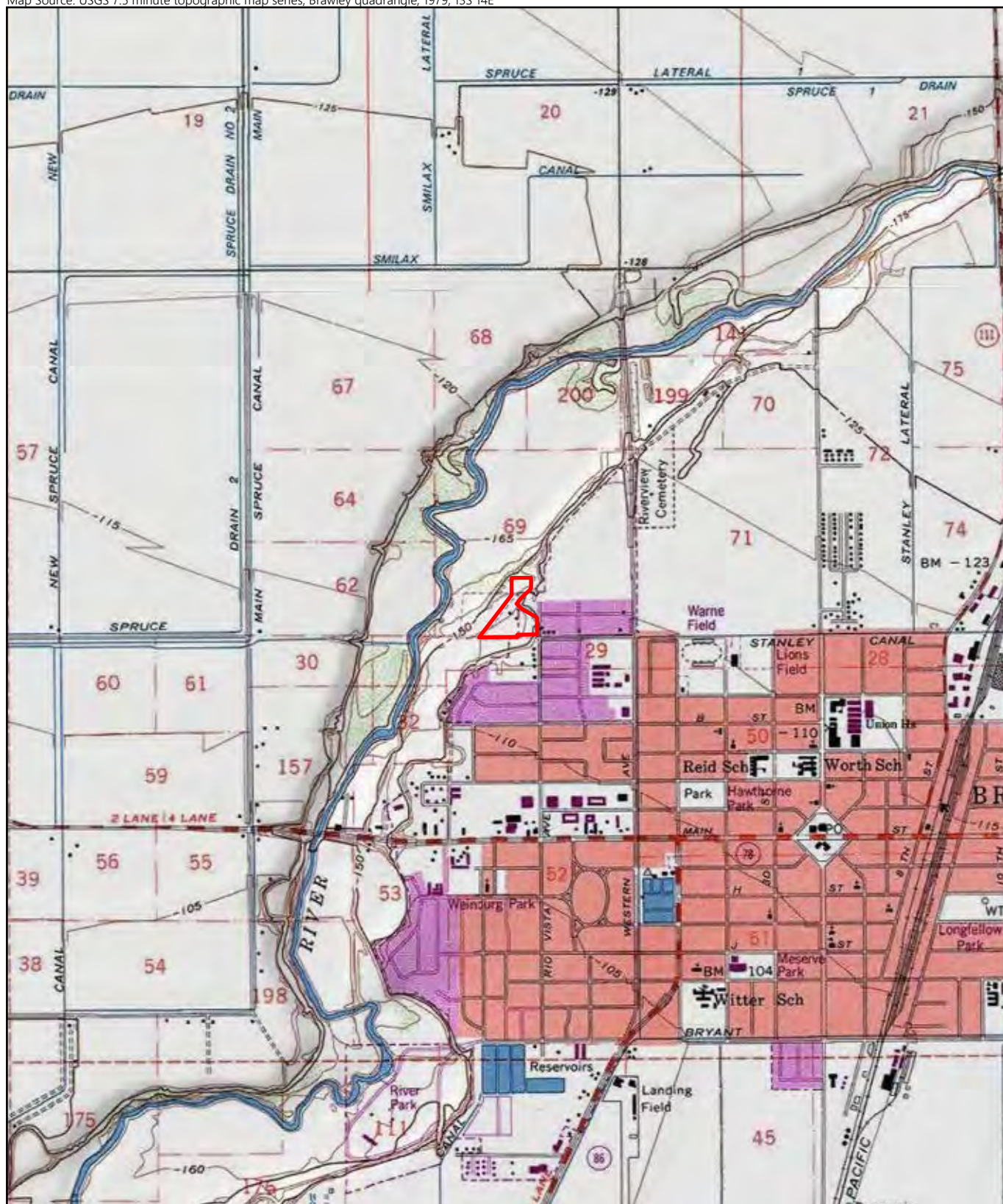
California Native Plant Society (CNPS)
2025 A Manual of California Vegetation, Online Edition. California Native Plant Society, Sacramento, CA.
<http://www.cnps.org/cnps/vegetation/>. Accessed July 18, 2025.

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1979 Brawley Well Quadrangle 7.5-Minute Topographic Map.

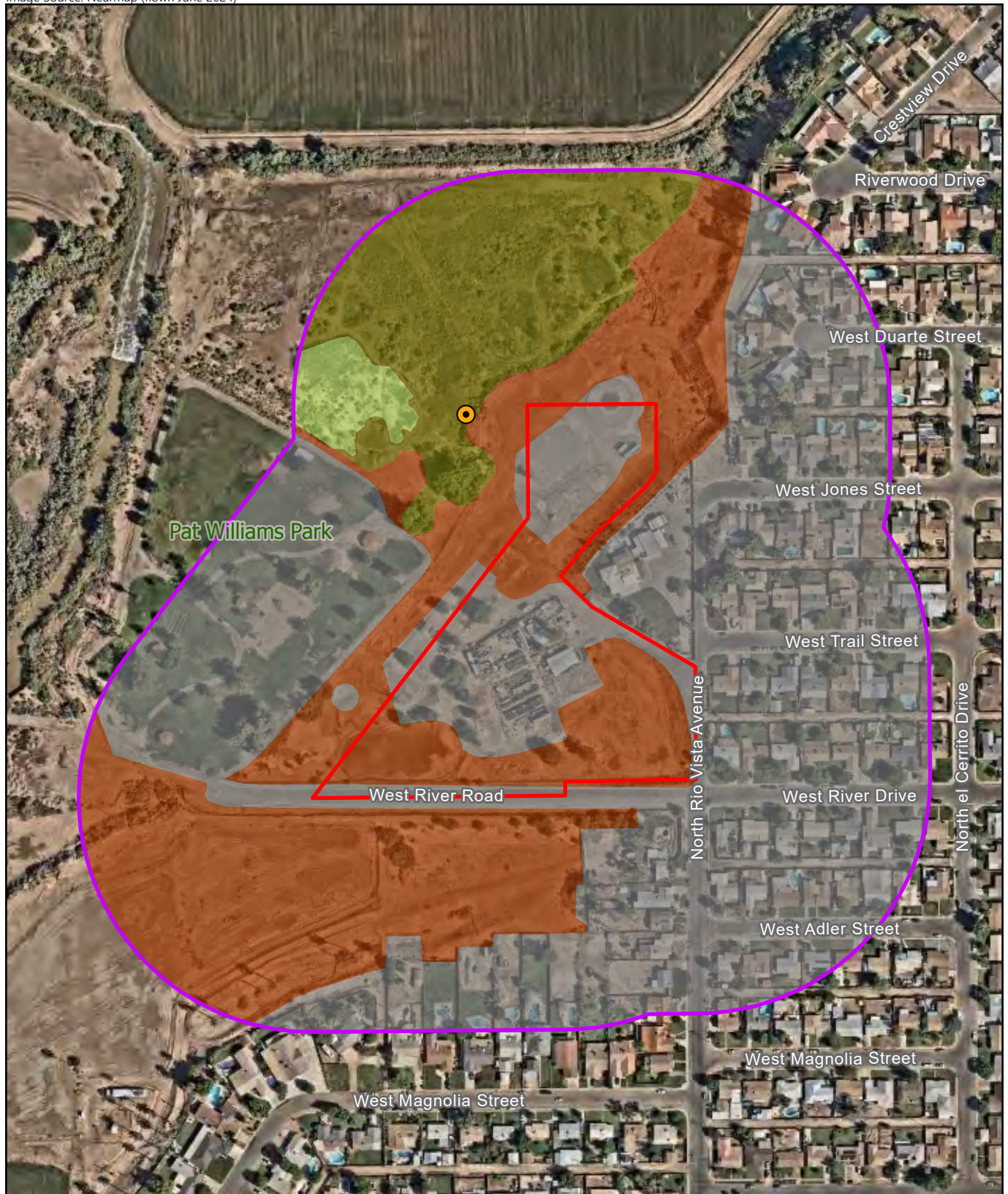


 Project Location

FIGURE 1
Regional Location

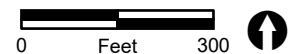


Project Boundary



- Project Site
- Burrowing Owl Survey Area
- Suitable Burrow

- Vegetation Community**
- Arrowweed Thickets
 - Disturbed
 - Iodine Bush Scrub
 - Urban/Developed Land





PHOTOGRAPH 1
View of Project Site from the Southwest Corner of the Site



PHOTOGRAPH 2
View of Equestrian Feature (Disturbed Land) in the
Southwest Portion of the Project Site



PHOTOGRAPH 3

View of Pat Williams Park (Urban/Developed Land) in the Western Portion of the Burrowing Owl Survey Area



PHOTOGRAPH 4

View of Iodine Bush Scrub Habitat in the Northwestern Portion of the Burrowing Owl Survey Area