Biological Resources Report for the County Animal Shelter San Diego County, California

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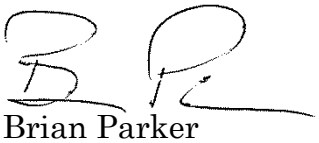

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List of Acronyms and Abbreviations

ºF	degrees Fahrenheit
APN	assessor parcel number
BMO	Biological Mitigation Ordinance
BRCA	Biological Resource Core Area
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
County	County of San Diego
CWA	Clean Water Act
DAS	Department of Animal Services
ESA	Endangered Species Act
HCP	Habitat Conservation Plan
LEED	Leadership in Energy and Environmental Design
MBTA	Migratory Bird Treaty Act
MSCP	Multiple Species Conservation Program
NCCP	Natural Community Conservation Planning
OHWM	ordinary high water mark
PAMA	Pre-Approved Mitigation Area
project	County Animal Shelter
RECON	RECON Environmental, Inc.
RPO	Resource Protection Ordinance
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

Summary

This biological resource report was prepared for the County of San Diego (County) County Animal Shelter project (project) to (1) document existing biological resources within the project site; (2) evaluate the project site and the vicinity for the potential to support sensitive biological resources; (3) assess direct, indirect, and cumulative impacts to these biological resources; and (4) recommend measures to avoid, minimize, and/or mitigate significant impacts.

Project Location and Description

The project is located on County-owned lands in the city of Santee, California. It lies on the southern portion of assessor parcel number (APN): 381-050-69-00, on the west side of North Magnolia Avenue and just north of the Las Colinas Detention and Reentry Facility. The project site is currently undeveloped.

The project includes the construction of an approximately 24,000-square-foot animal shelter, which would replace operations at the existing shelter in the community of Bonita (Bonita Shelter). The project would consist of four separate buildings with an internal, secure and open courtyard, an outdoor livestock area, an activity yard, a staff parking lot, and a public parking lot.

Methods

RECON Environmental, Inc. biologist Brian Parker conducted a general biological survey for the project. Mr. Parker surveyed the entire survey area on foot, mapped vegetation communities, recorded vegetation and habitat characteristics, and noted wildlife and plant species. All plant and animal species apparent at the time of the survey were recorded. The survey area was defined as the project site (APN 381-050-69-00), plus a 100-foot buffer.

Biological Resources

A total of six vegetation communities occur within the survey area: vernal pool, disturbed wetland, disturbed Diegan coastal sage scrub – Baccharis dominated, disturbed habitat, eucalyptus woodland, and urban/developed land. Of these, vernal pool, disturbed wetland, disturbed Diegan coastal sage scrub – Baccharis dominated are considered sensitive by the County.

A total of 46 plants and 17 animal species were detected during the biological investigations. No sensitive plant species were detected or have potential to occur in the survey area. No sensitive animal species were detected, but two sensitive animal species have potential to occur due to the presence of suitable habitat on-site: Cooper's hawk (*Accipiter cooperii*) and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*).

Although a jurisdictional delineation was not performed, the vernal pool on-site would likely be considered a wetland under the United States Army Corps of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB) because it supports hydrophytic vegetation, has evidence of wetland hydrology (biotic crusts), and hydric soils. The pool is not expected to be under California Department of Fish and Wildlife (CDFW) jurisdiction.

Project Effects and Mitigation

Special Status Species

The project has potential to impact two sensitive wildlife species: Cooper's hawk and San Diego black-tailed jackrabbit. In addition, non-listed migratory bird species have potential to nest within and adjacent to the project footprint and could be impacted.

The project would impact habitat used by San Diego black-tailed jackrabbit; however, individual jackrabbits are highly mobile and are expected to be able to avoid construction equipment. Thus, no direct impacts to San Diego black-tailed jackrabbit are anticipated.

Direct impacts to Cooper's hawk are not anticipated, as suitable nesting habitat for this species lies approximately 250 feet from the project footprint. However, the project would impact foraging habitat for this and other raptor species. This impact would be considered significant and would require mitigation.

Indirect impacts from construction noise have potential to impact Cooper's hawk and migratory bird species. High noise levels have been shown to adversely affect avian breeding success. The project has potential to cause indirect impacts from construction noise if construction occurs within 300 feet of an active nest for these species during the breeding season (January 15 to July 15 for raptors and February 15 to August 31 for migratory birds). To prevent impacts to sensitive bird species, grading, brush clearing, and all other construction should be conducted outside the general breeding season. If construction must occur during this period, the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for nesting migratory birds and raptors within 300 feet of the impact footprint prior to the commencement of construction activities during the respective breeding seasons (February 15 to August 31 for migratory birds, January 15 to July 15 for raptors).

- If nesting birds are not observed nesting within 300 feet of construction, no grading or construction restrictions would be required.

- If nesting birds are found, nests will be noted, and no grading or clearing shall occur within 300 feet of the active nest. Monitoring will occur to ensure that no nest is removed or disturbed until the young have fledged or the nest is no longer active.

- If construction must occur within 300 feet of an active nest, temporary sound barriers may be required or construction may be restricted near the nest site to reduce noise levels below an hourly average of 60 A-weighted decibels or ambient, whichever is

greater. Any temporary sound barriers must be placed within the impact areas and not in the adjacent habitat.

Riparian Habitat or Sensitive Natural Community

The project would cause direct permanent impacts to two sensitive vegetation communities: disturbed wetland and Diegan coastal sage scrub – Baccharis dominated. Permanent impacts to sensitive vegetation communities would require mitigation in the form of enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area; or other off-site preservation.

Jurisdictional Wetlands and Waterways

The project would not impact potential jurisdictional wetlands or waters as defined by the USACE, CDFW, or RWQCB. Therefore, no mitigation would be required by those resource agencies.

Wildlife Movement and Nursery Sites

The project would not substantially alter or impede wildlife corridors, linkages, or nursery sites; it would not create any artificial corridors; and construction lighting and noise would not prevent wildlife use of the corridor. Therefore, there would be no impact to wildlife movement or nursery sites and no mitigation would be required.

Local Policies, Ordinances, and Adopted Plans

The project is located on County-owned land in the city of Santee and is subject to County regulations. While the project is outside the boundaries of the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the analysis and mitigation recommended in this report follows the guidelines in the MSCP. The project would not conflict with any local policies, ordinances, or adopted plans. It would not result in an excess of the County's 5 percent habitat loss threshold for Diegan coastal sage scrub; affect the subregional Natural Communities Conservation Planning (NCCP) process or hinder the value of the site as a preserve; conflict with the County's Resource Protection Ordinance (RPO), MSCP, or Biological Mitigation Ordinance (BMO); preclude connectivity between areas of high value habitat; constrain wildlife corridors, impact any narrow endemic species; affect the likelihood of survival of any sensitive species; result in killing of migratory birds or eagles or the nests or eggs of these species.

1.0 Introduction

1.1 Purpose of the Report

RECON Environmental Inc. (RECON) prepared this biological resources report to (1) document existing biological resources within the project site; (2) evaluate the project site and the vicinity for the potential to support sensitive biological resources; (3) assess direct, indirect, and cumulative impacts to these biological resources; and (4) recommend measures to avoid, minimize, and/or mitigate significant impacts consistent with federal, state, and local regulations and ordinances, including the California Environmental Quality Act (CEQA) and the County of San Diego's (County) Guidelines for Determining Significance (County of San Diego 2010a). The report has been prepared according to the County's Report Format and Content Requirements for biological resources (County of San Diego 2010b).

1.2 Project Location and Description

1.2.1 Project Location

The County Animal Shelter project (project) is located on County-owned lands in the city of Santee, California (Figure 1). It is within unsectioned portions of the El Cajon Land Grant on the U.S. Geological Survey (USGS) 7.5-minute topographic map, El Cajon quadrangle (Figure 2; USGS 1996). The project site is situated on the west side of North Magnolia Avenue, just north of Las Colinas Detention and Reentry Facility, on the southern portion of assessor parcel number (APN) 381-050-69-00 (Figure 3). Specifically, it is located within the Town Center Specific Plan Amendment area, which allows for development of approximately 154 acres of County-owned land, including the subject parcel, within Santee's 706-acre Town Center Specific Plan area.

1.2.2 Project Description

The County Department of Animal Services (DAS) provides animal-related law enforcement, sheltering, medical and pet adoption services to the unincorporated areas of San Diego County. Currently, the County DAS owns and operates two animal shelter facilities in the San Diego region: one located in the community of Bonita (Bonita Shelter) and the other in the city of Carlsbad (Carlsbad Shelter). The proposed project would replace the existing Bonita Shelter located at 5821 Sweetwater Road, Bonita, California. The proposed project would be constructed to meet the County DAS current and projected needs for the County. The proposed project would provide animal services in a modern facility and would have the capacity for the transfer of all of the Bonita Shelter animals and services, including all livestock. The Carlsbad Shelter, which was redeveloped and expanded in 2005, would remain open and all other services and functions would remain unchanged.

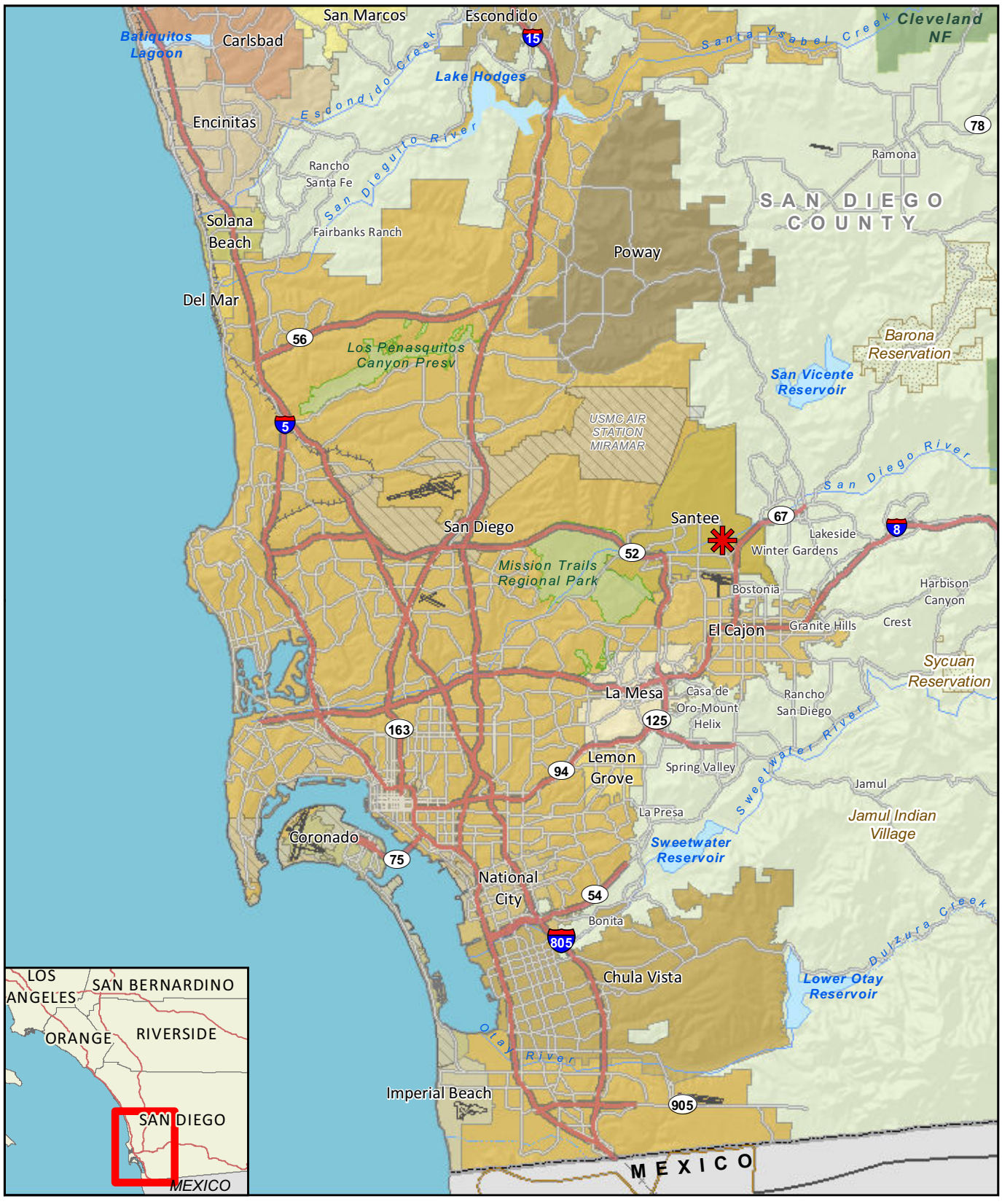

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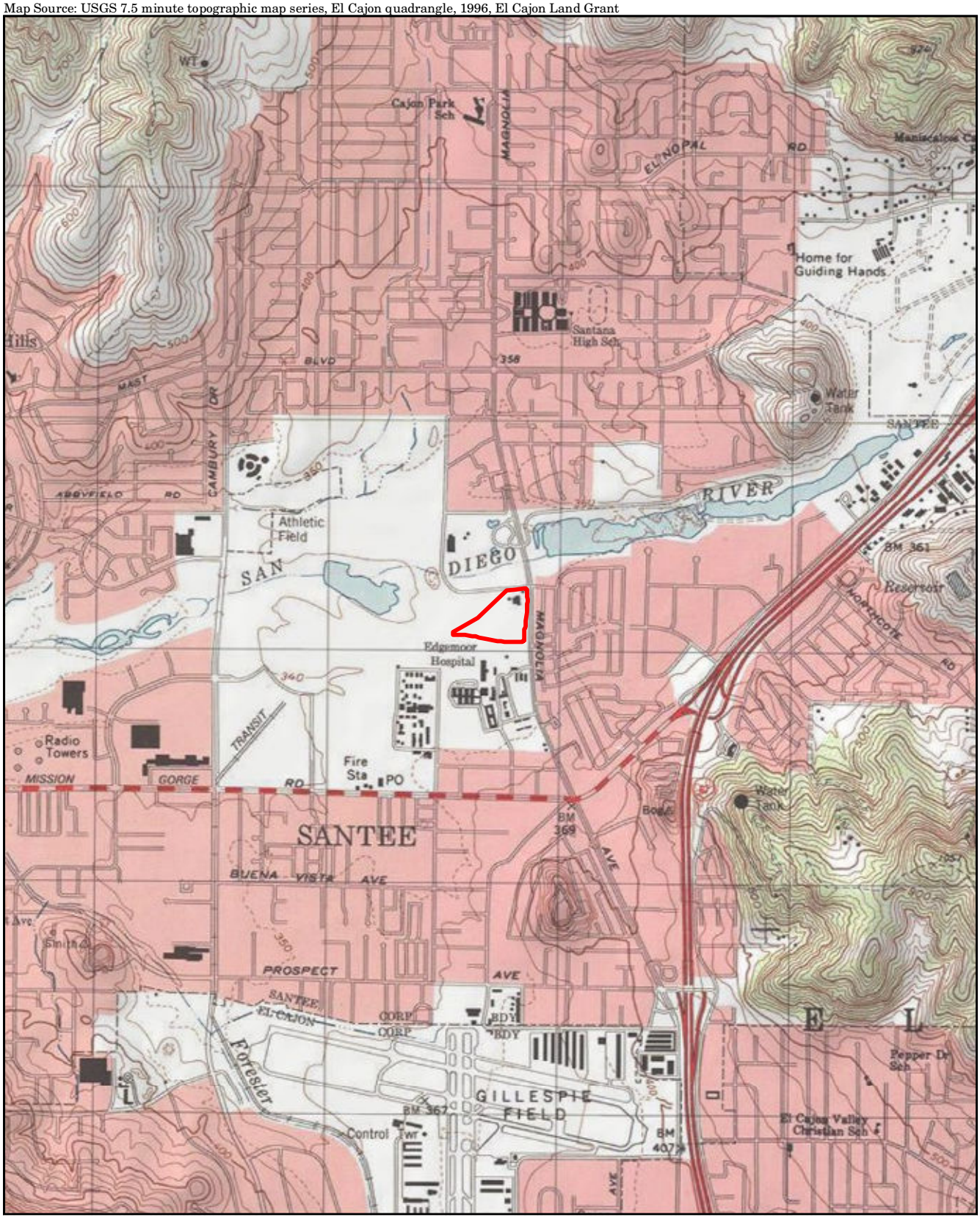
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, El Cajon quadrangle, 1996, El Cajon Land Grant



Project Boundary

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FIGURE 2
Project Location on USGS Map

Image Source: Nearmap (flown January 2020)

Project Boundary

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FIGURE 3

Project Location on Aerial Photograph

The County proposes the construction of an approximately 24,000-square-foot animal shelter on County-owned land within the boundaries of the city of Santee (the southern portion of APN 381-050-69-00). As shown on Figure 4, the project would consist of four separate buildings with an internal, secure and open courtyard, an outdoor livestock area, an activity yard, a staff parking lot, and a public parking lot. The two parking lots would have separate driveways for ingress and egress from Riverview Parkway. The four buildings would contain medical facilities, administration areas, and boarding areas for dogs, cats, rabbits, and other small animals. Off-site improvements would include sidewalk, curb, and gutter improvements along Riverview Parkway. Construction is anticipated to begin in November 2021 and end in January 2023.

Access to the project site would be from Interstate 8, State Route 52, State Route 67, and State Route 125, as well as major arterial roadways and public transportation services. The nearest trolley station (Santee Town Center) is located approximately 1.5 miles southwest of the project site and the nearest bus stop is located at the intersection of Riverview Parkway and North Magnolia Avenue, approximately 528 feet southeast of the project site.

Two unsignalized vehicular driveways would be constructed along Riverview Parkway to provide access to the proposed facility and two proposed parking lots. One driveway would be accessible to the general public, while the other driveway would be accessible to staff, contractors, deliveries, and livestock drop-off. Parking would consist of 28 staff spaces and 58 public spaces.

The proposed buildings would achieve a minimum in Leadership in Energy and Environmental Design (LEED) Silver designation, while also reaching a higher level of sustainability with a zero-net energy performance. The proposed project would include "green" building elements constructed in accordance with California's Title 24 Building Energy Efficiency Standards. An environmental design feature would include, but is not limited, to photovoltaic solar panels and electric vehicle charging stations.

Development of the proposed project would include the provision of utility infrastructure, specifically storm water drains, sewer, water, electricity, natural gas, and telecommunications. The infrastructure for the proposed project would tie into the existing utility lines and upgrade as necessary to accommodate the proposed development.

Landscaping would consist of a mix of trees, shrubs, and ground cover and comply with the County's Landscape Ordinance and Water Efficient Landscape Design Manual. The proposed project would include bio-retention swales to reduce runoff into drainage facilities.

All current County DAS shelter hours of operation are from 9:30 a.m. to 5:30 p.m., Tuesday through Sunday with adoption hours closing at 4:00 p.m. All County DAS animal shelters are closed to the public on Mondays and County holidays. The shelter hours for the proposed project would remain unchanged from the current shelter hours at the Bonita Shelter and Carlsbad Shelter.

Image Source: Nearmap (flown January 2020)

Project Boundary

0 Feet 200

Soil Type

Grangeville fine sandy loam, 0 to 2 percent slopes

Visalia sandy loam, 0 to 2 percent slopes

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FIGURE 4
Soil Types

1.3 Survey Methodologies

1.3.1 Literature Review

RECON conducted a review of existing biological data for the project site, including a database query for sensitive plant and animal species reported within two miles of the project site, and a review of the site's physical characteristics (e.g., location, elevation, soils/substrate, topography). Sources included the California Natural Diversity Database (CNDDB; California Department of Fish and Wildlife [CDFW] 2020a), the All Species Occurrences Database (U.S. Fish and Wildlife Service [USFWS] 2020), the County of San Diego's SanBIOS database (County of San Diego 2020) the California Native Plant Society Online database (CNPS; 2020), and the U.S. Department of Agriculture (USDA) Soil Conservation Service maps and descriptions (USDA 1973 and 2020a).

1.3.2 General Biological Resource Survey

RECON biologist Brian Parker conducted a general biological survey on Saturday, March 7, 2020 between 10:00 a.m. and 12:00 p.m. within the project site and a 100-foot buffer (survey area). At the time of the survey, temperatures ranged from 58 degrees Fahrenheit (ºF) to 65 ºF, wind speed of 0 to 2 miles per hour, and cloud cover of 40 to 50 percent. Mr. Parker surveyed the entire survey area on foot, mapped vegetation communities, recorded vegetation and habitat characteristics, and noted wildlife and plant species. All plant and animal species apparent at the time of the survey were recorded. Plants were visually identified in the field, and wildlife species were identified visually with the aid of binoculars or aurally based on identification of calls. Mammal species were identified by observation or observation of scat, tracks, or burrows. Mr. Parker conducted a brief follow-up site visit on March 18, 2020, to inspect the vernal pool following a period of heavy rains.

Vegetation communities were mapped following the classification system of Holland (1986) as amended by Oberbauer et al (2008). Nomenclature in this report follows the Jepson Online Interchange (University of California 2020) and Rebman and Simpson (2014), for common plants, Sunset Western Garden Book (Brenzel 2001) for ornamental species, CNDDB (CDFW 2020a-c) for sensitive plant species, San Diego Natural History Museum (2002) for moths and butterflies, Crother et al. (2017) for amphibians and reptiles, American Ornithological Society Checklist (Chesser et al. 2018) and Unitt (2004) for birds, and Bradley et al. (2014) and Baker et al. (2003) for mammals.

1.4 Environmental Setting

The project site consists of a historically developed parcel; in 2005, when RECON conducted surveys for the Santee Town Center project (RECON 2005), the property consisted of a single-family residence in the northeast corner, and mowed agriculture in the remainder of the site. In late 2008 or early 2009, the agricultural portion of the site was graded and a large elevated pad was constructed in anticipation of future development. In 2011, the residence was demolished, leaving the entire site cleared, with the exception of several trees.

Land uses surrounding the project site include residential subdivisions to the southeast of North Magnolia Avenue; residential mobile homes to the east of North Magnolia Avenue; Las Colinas Detention and Reentry Facility to the immediate south; and undeveloped land to the west and north. The San Diego River lies approximately 200 feet to the north of the project site and 550 feet north of the proposed impact area (see Figure 3).

Two soil series are mapped within the project site: Grangeville fine sandy loam in the southeastern corner, and Visalia sandy loam throughout the remainder of the site (see Figure 4; USDA 1973).

1.4.1 Regional Context

The project occurs on County-owned land within the Town Center Specific Plan area in the city of Santee. Although the project site is not located within the boundaries of the Multiple Species Conservation Program (MSCP) Subarea Plan, it is subject to County regulations. As such, site this report addresses the project per MSCP guidelines. The County prepared the MSCP Subarea Plan to guide implementation of the MSCP Plan in the South County. The MSCP identifies as Pre-Approved Mitigation Areas (PAMAs) and the County's Biological Mitigation Ordinance establishes criteria for Biological Resource Core Areas (BRCAs; County of San Diego 2010c). The project site is not located within any PAMA and would not meet the criteria of a Biological Resource Core Area.

1.4.2 Habitat Types/Vegetation Communities

A total of six vegetation communities occur within the survey area (Table 1, Figure 5). A brief description of each community, including the dominant plant species observed, is provided below.

Table 1
Vegetation Communities within the Survey Area (acres)

Vegetation Community[1]	Total Survey Area	Project Site
Tier I		
Vernal Pool (44000)	0.02	0.02
Disturbed Wetland (11200)	0.08	0.08
Tier II		
Disturbed Diegan Coastal Sage Scrub – Baccharis dominated (32530)	4.76	3.45
Tier IV		
Eucalyptus Woodland (79100)	0.52	0.45
Disturbed Habitat (11300)	9.27	6.57
Urban/Developed (12000)	3.62	0.02
Total	**18.27**	**10.59**

[1]Holland Codes (as modified by Oberbauer et al. 2008) shown in parentheses.

Image Source: Nearmap (flown January 2020)

Project Boundary
100 ft Survey Area

Vegetation Community

Disturbed Baccharis Scrub
Eucalyptus Woodland
Vernal Pool
Disturbed Wetland
Disturbed Habitat
Urban/Developed

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FIGURE 5
Existing Biological Resources

1.4.2.1 Vernal Pool

Vernal pools are shallow, isolated, seasonal wetlands that typically support a characteristic suite of plant and animal species. Plants in vernal pools may be aquatic or may germinate following the drying of the pool. Vernal pools are considered a County Tier I vegetation community.

One vernal pool was mapped within the survey area, outside the development footprint (Figure 6). Based on review of historic aerial imagery, this pool appears to have formed following the grading of the property in 2009. This artificially created pool appears very shallow and is dominated by grass poly (*Lythrum hyssopifolia*) and dwarf woolly-heads (*Psilocarphus brevissimus* var. *brevissimus*). Both species are common to vernal pools, the latter being a vernal pool indicator plant. Sub-dominant plants occurring in the vernal pool include long-beak filaree (*Erodium botrys*), stinkwort (*Dittrichia graveolens*), smooth cat's ear (*Hypochaeris glabra*), and Mediterranean schismus (*Schismus barbatus*). Additionally, the pool had a black algal crust.

1.4.2.2 Disturbed Wetland

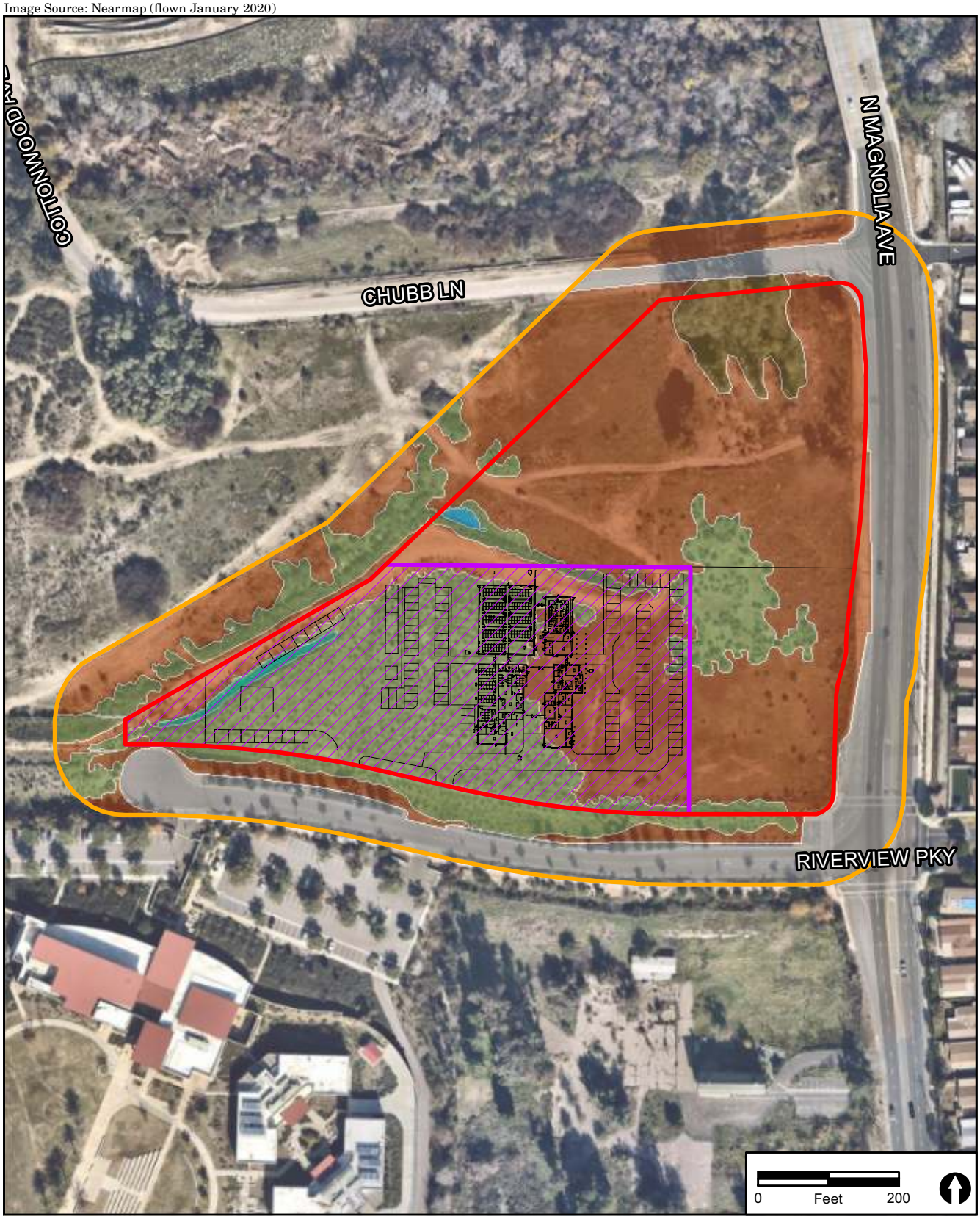
Disturbed wetland occurs in areas permanently or periodically inundated by water, which have been significantly modified by human activity. Examples include lined channels, Arizona crossings, detention basins, culverts, and drainage ditches (Oberbauer et al. 2008). Although this community is disturbed and characterized by non-native species, as a wetland, it is considered a Tier I vegetation community.

One area of disturbed wetland occurs in the survey area, at the western end of the graded pad within the development footprint (see Figure 5). It appears to have been created as a detention basin at the time the pad was graded. The bottom portion of the basin is dominated by grass poly, with lesser amounts of long-beak filaree, and Mediterranean schismus. Along the perimeter of the basin, dominant species include tamarisk (*Tamarix* sp.), curly dock (*Rumex crispus*), and willow (*Salix* sp.), which was mostly leafless at the time of the survey.

1.4.2.3 Disturbed Diegan Coastal Sage Scrub – Baccharis dominated

Diegan coastal sage scrub consists of low-growing, aromatic, drought-deciduous soft-woody shrubs. It occurs in coastal areas from Los Angeles County south into Baja California, Mexico (Oberbauer et al. 2008). Diegan coastal sage scrub – Baccharis dominated is a coastal sage scrub habitat that is dominated by *Baccharis* species. Diegan coastal sage scrub habitats are considered Tier II vegetation communities (County of San Diego 1997).

Image Source: Nearmap (flown January 2020)



Site Plan
Project Impact Area
Project Boundary
100 ft Survey Area

Vegetation Community
Disturbed Baccharis Scrub
Eucalyptus Woodland
Vernal Pool
Disturbed Wetland
Disturbed Habitat
Urban/Developed

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FIGURE 6
Impacts to Biological Resources

This vegetation community occurs in several patches throughout the project site, most of which lie within the development footprint. These areas are classified as disturbed because the property was graded in 2009 and kept clear for some time afterwards. While overall vegetation cover is approximately 60 percent, it is dominated by approximately 50 percent cover by non-native species, with only about 15 percent cover by natives (including overlap). Native cover consists almost exclusively of broom baccharis (*Baccharis sarothroides*), which is often an early pioneer onto disturbed sites. Non-native species include long-beak filaree redstem filaree (*Erodium cicutarium*), red brome (*Bromus madritensis* ssp. *rubens*), Mediterranean schismus, tocalote (*Centaurea melitensis*), and smooth cat's ear.

1.4.2.4 Eucalyptus Woodland

Eucalyptus woodland is characterized by tall, exotic, gum trees (*Eucalyptus* sp.) that originated in Australia. It is common in urban areas and the coastal plains. It often forms monotypic stands with little or no shrubby understory due to the frequent shedding of bark and large amounts of leaf litter, which have chemical characteristics that can limit growth of other plants in the understory (Oberbauer et al. 2008). Naturalized eucalyptus woodland can be harmful to native vegetation because it can displace native species. Eucalyptus woodland is considered a Tier IV vegetation community because it does not support native vegetation (County of San Diego 1997).

Within the survey area, there is one patch of eucalyptus woodland in the northeast corner, at a site that historically contained a single-family residence (see Figure 5). It is likely that after the home was demolished, the gum trees remained as naturalized individuals and spread slightly into the surrounding area.

1.4.2.5 Disturbed Habitat

Disturbed habitat consists of areas that have been previously disturbed by human activities and no longer function as a native vegetation community. Such areas include previously graded lands such as fire breaks, off-road vehicle trails, and construction staging sites (Oberbauer et al. 2008). Vegetation in such areas is typically dominated by opportunistic non-native species. Disturbed habitat is considered a Tier IV vegetation community (County of San Diego 1997).

Disturbed habitat is the dominant vegetation community in the survey area. It occurs throughout the eastern and northern portions and in areas that have been cleared as dirt roads (see Figure 5). Dominant plants in the disturbed habitat include non-native species such as long-beak filaree, wall barley (*Hordeum murinum*), redstem filaree, and short-pod mustard (*Hirschfeldia incana*). Several native annual wildflowers are also sub-dominant species in the disturbed habitat. These include comb-bur (*Pectocarya* sp.), common fiddleneck (*Amsinckia menziesii*), bajada lupine (*Lupinus concinnus*), popcorn flower (*Cryptantha* sp.), and telegraph weed (*Heterotheca grandiflora*). Several native shrubs are also scattered through the disturbed habitat, including broom baccharis and deerweed (*Acmispon glaber*).

1.4.2.6 Urban/Developed Land

Urban/developed land includes areas that have existing paved roads, buildings, or maintained, ornamental, or landscaped vegetation. Urban/developed land occurs only within the 100-foot survey buffer, and consists of paved roads along North Magnolia Avenue, Riverview Parkway, and Chubb Lane (see Figure 5).

1.4.3 Flora

A total of 46 plant species were recorded within the survey area, including 24 native species and 22 non-native species. Although there are more native than non-native species present, the majority of cover is dominated by non-native, ruderal species. Even within the native and sensitive vegetation communities, non-native species are more abundant than natives. A list of all plant species observed within the survey area is included as Attachment 1.

1.4.4 Fauna

A total of 17 animal species were observed or detected within the survey area, including four invertebrate, one reptile, seven bird, and five mammal species. The wildlife recorded were largely species adapted to urban areas and the urban-wildland interface. No large mammals were detected during the surveys. The site likely provides nesting and foraging habitat for migratory birds and tree-nesting raptors. A list of all animal species detected within the survey area is included as Attachment 2.

1.4.5 Sensitive Plant Species

No sensitive plant species were observed or have moderate to high potential to occur in the survey area. Sensitive plant species that have been historically recorded within two miles of the site (CDFW 2020a) are discussed in Attachment 3.

1.4.6 Sensitive Animal Species

No sensitive wildlife species were observed during the biological survey, but two species – Cooper's hawk (*Accipiter cooperii*) and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) – have moderate potential to occur. These species are discussed individually, below. In addition, San Diego fairy shrimp (*Branchinecta sandiegonensis*) is discussed in this section because, while the vernal pool within the survey area is very shallow, it ponded following heavy rains and potential for this species to occur could not be eliminated. An assessment of sensitive animal species potential to occur is presented in Attachment 4.

Cooper's hawk (nesting). Cooper's hawk is a CDFW Watch List species (nesting) and is a County Group 1 species (CDFW 2019a; County of San Diego 2010a). The Cooper's hawk's year-round range extends throughout most of the United States. Its wintering range extends south to Central America, and its breeding range extends north to southern Canada (Rosenfeld and Bielefeldt 1993). Breeding birds are widespread over San Diego County's coastal slope and most abundant in lowland and foothill canyons and in urban areas. It is a

common breeder in both oak and willow riparian woodlands and urban environments, with eucalyptus trees used nearly as often as oaks (Unitt 2004). Additionally, this species has been known to nest within planted trees including pine, redwood, and avocado (Unitt 2004). Breeding occurs from March to June, and nests are typically located high in the tree but under the canopy. This hawk forages primarily on medium-sized birds but is also known to eat small mammals such as chipmunks and other rodents (Rosenfeld and Bielefeldt 1993). Although urbanization and loss of habitat have contributed to the decline of this species, the Cooper's hawk acclimation to city living has generously increased their numbers (Unitt 2004).

Cooper's hawk was not detected during the biological survey. While nesting activity was not observed, there are several tall gum trees in the eucalyptus woodland in the northern portion of the survey area that are suitable for nesting. However, the potential is moderate given that the trees are situated adjacent to North Magnolia Avenue, a moderately busy roadway. Additionally, there is high-quality nesting habitat in the riparian areas along the San Diego River to the north. Given the abundance of rodent burrows observed, there is suitable foraging habitat throughout the Diegan coastal sage scrub – Baccharis dominated and disturbed habitat.

San Diego black-tailed jackrabbit. The San Diego black-tailed jackrabbit is a CDFW species of special concern, an MSCP covered species and is a County Group 2 species (CDFW 2019b; County of San Diego 2010c). It ranges from the Kern-Ventura county line southward and west of the Peninsular Range into Baja California (Hall 1981). This species can be found throughout southern California, with the exception of the high-altitude mountains. It occupies open or semi-open habitats, such as coastal sage scrub and sparse chaparral, although forests and thick chaparral are not suitable (Bond 1977). The San Diego black-tailed jackrabbit breeds throughout the year, with a peak in April and May. It is strictly herbivorous, preferring habitat with ample forage such as grasses and forbs. Declines in San Diego black-tailed jackrabbit populations are due to habitat loss as a result of urban development.

Although not detected during surveys, there is suitable habitat in the disturbed Diegan coastal sage scrub and some areas of disturbed habitat. Rabbit scat was abundant on-site and, while the droppings that that were inspected closely were from San Diego desert cottontail (*Sylvilagus audubonii*), it is possible some belonged to the San Diego black-tailed jackrabbit. Thus, this species is considered to have moderate potential to occur.

San Diego Fairy Shrimp. San Diego fairy shrimp is federally listed as endangered (CDFW 2019b). This fairy shrimp occurs in limited populations in Santa Barbara and Orange counties, and in San Diego County from San Marcos and Ramona south to Otay Mesa and into northwestern Baja California, Mexico, at Valle de Las Palmas (USFWS 1997). The majority of San Diego fairy shrimp populations are located in San Diego County. San Diego fairy shrimp are restricted to vernal pools and prefer cool water temperatures. This species can also be found in ditches and road ruts that are located in degraded vernal pool habitat. Fairy shrimp remain dormant in cysts until pools fill during the rainy season. Nauplii emerge from cysts and develop into adults sometime between mid-December and early May (Eriksen

and Belk 1999). Development takes from 10 to 20 days and is dependent on water temperature. Primary threats to this species are habitat destruction and fragmentation, alterations of wetland hydrology, off-road-vehicle activity, and grazing (USFWS 1997).

The vernal pool on-site was likely created artificially when the site was graded and the large elevated pad was constructed. The pool lies immediately to the north of the graded pad. It appears very shallow, but was observed ponding following heavy rains in March, 2020. Based on the likely artificial creation and shallow depth of the pool, it may not pond long enough to support fairy shrimp. However, a definitive conclusion could not be made without focused surveys. As the pool is located 50 feet north of the impact footprint, focused surveys are not recommended.

1.4.7 Jurisdictional Wetlands and Waterways

Wetlands and waters are delineated based on the presence of one or more hydrophytic vegetation, hydric soils, and wetland hydrology, each of which is discussed below. It should be noted that a formal delineation of potential jurisdictional wetlands and waters was not conducted for the project. The County also regulates impacts to wetlands via the Resource Protection Ordinance (RPO); however, as a public facility with public use, the proposed project is exempt from the RPO.

Hydrophytic Vegetation. Hydrophytic vegetation is defined as "the sum total of macrophytic plant life growing in water or on a substrate that is at least periodically deficient in oxygen as a result of excessive water content" (U.S. Army Corps of Engineers [USACE] 1987). A plant species' wetland indicator status can be determined by using the list of wetland plants for California provided by the USFWS (Lichvar et al. 2016).

Hydric Soils. A hydric soil is a soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions that favor the accumulation of visible indicators of extended saturation (USACE 1987). Information on the soil types sampled in the project site is summarized from the Soil Survey for San Diego County (USDA 1973) and the Hydric Soils list obtained from the USDA's Natural Resources Conservation Service (USDA 2020b).

Hydrology. Wetland hydrology indicators are used to determine if inundation or saturation has occurred on a site. These indicators are features that suggest current or recent flows through an area but do not provide information about the timing, duration, or frequency of the event. Hydrology features are generally the most ephemeral of the three wetland parameters (USACE 2008).

1.4.7.1 U.S. Army Corps of Engineers

a. Criteria

Under Section 404 of the Clean Water Act, the USACE regulates the dredging or discharge of fill material into Waters of the U.S. including wetlands and non-wetland Waters of the U.S. USACE jurisdictional wetlands are defined as those areas that meet all three wetland

parameters discussed above. USACE jurisdictional non-wetland waters include vegetated or unvegetated streams, open water, and other aquatic areas with strong hydrology indicators such as the presence of seasonal flows and an ordinary high water mark (OHWM). An OHWM is defined as:

> . . . that line on the shore established by the fluctuations of water and indicated by physical characteristics such as [a] clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (33 Code of Federal Regulations [CFR] Part 328.3).

Areas delineated as non-wetland waters may lack wetland vegetation or hydric soil characteristics. Hydric soil indicators may be missing, because topographic position precludes ponding and subsequent development of hydric soils. Absence of wetland vegetation can result from frequent scouring due to rapid water flow.

b. Status On-Site

While the disturbed wetland in the detention basin is characterized by a preponderance of hydrophytic vegetation, it is hydrologically isolated and is not expected to meet the hydrology criteria required for USACE wetlands.

The vernal pool would likely be considered a vernal pool under USACE jurisdiction because it supports a vernal pool plant indicator species (USACE 1997). The presence of vernal pool flora, in conjunction with evidence of ponding (biotic crusts), identify the presence of wetland hydrology. Additionally, the pool is expected to meet the wetland soils criterion because Visalia sandy loam is identified as a hydric soil on the USDA's Hydric Soils list obtained from the USDA's Natural Resources Conservation Service (USDA 2020b).

1.4.7.2 California Department of Fish and Wildlife – Jurisdictional Criteria

a. Criteria

Under Sections 1600–1607 of the California Fish and Game Code (CFGC), the CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. In most cases, CDFW jurisdictional areas overlap USACE jurisdictional areas; however, the CDFW also regulates riparian vegetation associated with watercourses, regardless of USACE jurisdiction.

b. Status On-Site

The disturbed wetland in the detention basin is not expected to be considered a CDFW wetland because it is not a natural feature and lacks connectivity to other nearby waters.

The vernal pool would likely not be considered a CDFW wetland because does not support any state-listed plant species.

1.4.7.3 Regional Water Quality Control Board - Jurisdictional Criteria

a. Criteria

The jurisdiction of the Regional Water Quality Control Board (RWQCB) includes all Waters of the State and all Waters of the U.S. as mandated by both Section 401 of the federal Clean Water Act and the California Porter–Cologne Water Quality Control Act. State waters generally include, but are not limited to, all waters under the jurisdiction of USACE.

b. Status On-Site

RWQCB jurisdictional Waters of the State within the project site are expected to be identical to the USACE waters. The disturbed wetland would likely not meet the three wetland criteria but vernal pool is expected to be considered a RWQCB wetland.

1.4.8 Habitat Connectivity and Wildlife Corridors

Wildlife movement corridors are areas that connect wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important, because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by resource and conservation agencies.

The project site is located approximately 500 feet south of the San Diego River, at the edge of the main urbanized area of the city of Santee. The San Diego River represents a regional wildlife corridor through Santee, connecting undeveloped areas in unincorporated San Diego County with preserve lands in Mission Trails Regional Park. The corridor consists of an approximately 1,800-foot-wide strip of undeveloped land as it passes the project site. Most of the 1,800 feet appears to be disturbed habitat surrounding a 300- to 400-foot-wide riparian corridor. The project site was historically developed and used for agriculture, was graded in 2009, and has only recently been re-colonized by pioneering native shrubs. Based on this history of development and highly disturbed condition, its contribution to the habitat value of the wildlife corridor is minor. With project development, the corridor would remain approximately 1,500 feet wide, and the high-value portion of the corridor – the riparian area directly along the river – would be unaffected. Therefore, wildlife movement within the corridor would be largely unaffected.

1.5 Applicable Regulations

1.5.1 Federal Regulations

a. Endangered Species Act

The federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take." Take of a federally listed threatened or endangered species is prohibited without a special permit. The ESA allows for take of a threatened or endangered species incidental to development activities once a habitat conservation plan has been approved by the USFWS and an incidental take permit has been issued. The ESA also allows for the take of threatened or endangered species after consultation has deemed that development activities will not jeopardize the continued existence of the species. The federal ESA also provides for a Section 7 Consultation when a federal permit is required, such as a Clean Water Act (CWA) Section 404 permit.

"Critical Habitat" is designated under federal ESA to guide actions by federal agencies and is defined as "an area occupied by a species listed as threatened or endangered within which are found physical or geographical features essential to the conservation of the species, or an area not currently occupied by the species which is itself essential to the conservation of the species."

b. Section 404 Clean Water Act Regulations

The CWA provides wetland regulation at the federal level and is administered by the USACE. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all Waters of the U.S. Permitting is required for filling waters of the U.S. (including wetlands). Permits may be issued on an individual basis or may be covered under approved nationwide permits. As mentioned above, the project would avoid impacts to likely jurisdictional areas, so permits subsequent to CWA Section 404 would not be required.

c. Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 United States Code 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and is listed at 50 Code of Federal Regulations (CFR) 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA. 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 (50 CFR 21.11).

Pursuant to U.S. Department of the Interior Memorandum M-37050, the federal MBTA is no longer interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

1.5.2 State of California

a. California Environmental Quality Act

CEQA requires that biological resources be considered when assessing the environmental impacts that are the result of proposed actions. The lead agencies determine the scope of what is considered an impact and what constitutes an "adverse effect" on a biological resource.

b. California Fish and Game Code

The CFGC regulates the taking or possession of birds, mammals, fish, amphibians, and reptiles, as well as natural resources such as wetlands and Waters of the State. It includes the California Endangered Species Act, Streambed Alteration Agreement regulations, and California Native Plant Protection Act. CFGC Section 3503 states that "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," and Section 3503.5 states that "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird" unless authorized.

c. California Endangered Species Act

The California Endangered Species Act, similar to the federal Endangered Species Act, contains a process for listing of species and regulating potential impacts to listed species. State threatened and endangered species include both plants and wildlife but do not include invertebrates. The designation "rare species" applies only to California native plants. State threatened and endangered plant species are regulated largely under the Native Plant Preservation Act in conjunction with the California Endangered Species Act. State threatened and endangered animal species are legally protected against "take." The California Endangered Species Act authorizes CDFW to enter into a memorandum of agreement for take of listed species to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met.

d. Streambed Alteration Agreement Regulations

The CFGC (Sections 1600 through 1603) requires a Streambed Alteration Agreement with CDFW for projects affecting riparian, wetland habitats, and all other Waters of the State. As mentioned above, the project is not expected to impact any CDFW wetlands or streambeds and would not require a Streambed Alteration Agreement.

e. California Native Plant Protection Act

Section 1900-1913 of the CFGC contains the regulations of the Native Plant Protection Act of 1977. The intent of this act is to help conserve and protect rare and endangered plants in the state.

f. Section 401 Clean Water Act and Porter-Cologne Act

The RWQCB regulates water quality in Waters of the U.S. under Section 401 of the CWA, and also regulates the isolated waters under the state Porter-Cologne Act utilizing a Waste Discharge Requirement. Discharge of fill material into Waters of the State not subject to the jurisdiction of the USACE pursuant to Section 404 of the CWA may require authorization pursuant to the Porter-Cologne Act through application for waste discharge requirements or through waiver of waste discharge requirements, despite the lack of a clear regulatory imperative. As mentioned above, the project would not impact these potential jurisdictional waters and would not require permits under CWA Section 401 or a Waste Discharge Permit.

g. Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning (NCCP) Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land use. CDFW is the primary state agency that implements the NCCP. The NCCP program provides for the comprehensive management and conservation of multiple wildlife species. It identifies and provides for regional protection of natural wildlife diversity while allowing for compatible and appropriate development and growth.

1.5.3 County of San Diego

a. Multiple Species Conservation Program

The project is located on County-owned property within the city of Santee. As such, it would be subject to County regulations and ordinances. While the project is outside the boundaries of the MSCP, the analysis and mitigation recommended in this report follow the guidelines in the MSCP. The MSCP is designed to identify lands that would conserve habitat for federal and state endangered, threatened, or sensitive species. It provides a process for the local issuance of permits under the federal and state ESAs for impacts to threatened and endangered species. Also included in the MSCP are implementation strategies, preserve design, and management guidelines.

The County MSCP Subarea Plan designates BRCA lands as suitable for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. The MSCP also designates PAMAs to concentrate conservation efforts and provides incentives to focus development outside a PAMA. No lands that qualify as BRCA or PAMA occur within the survey area.

b. Biological Mitigation Ordinance

The Biological Mitigation Ordinance (BMO) provides criteria for the avoidance of impacts to BRCAs and sensitive biological resources, and establishes mitigation requirements for projects requiring discretionary permits. It generally directs preservation or biological resources toward land that can be combined with larger areas of contiguous habitat or linkages (County of San Diego 2010c). Although the project is located outside the boundaries of the MSCP, this report incorporates mitigation ratios in accordance with the BMO.

c. Resource Protection Ordinance

The County's RPO was implemented to protect wetlands, floodplains, steep slopes, sensitive habitats, and prehistoric and historic sites (County of San Diego 1991). As a public facility with public use, the proposed project is exempt from the RPO.

2.0 Project Effects

This section of the report discusses the direct, indirect, and cumulative impacts to biological resources from the project.

2.1 Direct Impacts

Direct impacts are incurred when project activities, such as grading or vegetation clearing, result in the loss of biological resources.

As discussed in Section 1.4.4, tree-nesting raptors and general migratory birds have potential to nest within the survey area. When addressing potential impacts to breeding or nesting birds, this report follows the County Guidelines for Determining Significance (County of San Diego 2010a) regarding breeding seasons for general migratory birds (February 15 to August 31) and tree-nesting raptors (January 15 to July 15).

The project would also impact foraging habitat for Cooper's hawk and other raptors through impacts to disturbed habitat and disturbed Diegan coastal sage scrub – Baccharis dominated.

2.2 Indirect Impacts

Indirect impacts are effects on vegetation communities or species from actions that may be separated temporally or spatially from primary construction activities. The project was designed to minimize indirect impacts to the degree feasible. Examples of indirect impacts are discussed below.

Increased Human Activity. Increased human activity in undeveloped areas can increase vegetation trampling, and soil compaction, and can reduce habitat quality and viability. In addition, increased human activity can deter wildlife from using habitat areas in the project vicinity.

The project site is already subject to a high level of unauthorized human activity, as the fencing on the western and southern boundaries are incomplete or damaged. There is evidence of vehicle and pedestrian access, as well as dumping through much of the site. The proposed animal shelter development is not expected to increase human activity in the undeveloped portions of the site.

Invasive Species. Invasive species have the potential to displace and dominate native species, hybridize with native plant species, provide food and habitat for invasive animal species, and disturb normal ecosystem functions such as nutrient cycling, wetland hydrology, sedimentation, fire frequency, and erosion (Brossard et al. 2000). Disturbances adjacent to natural open space, such as grading and vegetation management, create opportunities for non-native species to invade and establish themselves.

The dominant plant species within the project site are all non-native species, some of which are invasive. The proposed project is not anticipated to increase the abundance of invasive species in the surrounding undeveloped areas.

Hydrology Alteration: Hydrologic alterations include changes in water levels, flow rates, and patterns in waterways and dewatering, each of which may affect resources and vegetation communities within and adjacent to the lake basins. Adverse water-quality impacts include chemical-compound pollution (discussed below), erosion, increased turbidity, and excessive sedimentation. Removal of native vegetation and increased runoff from roads and other paved surfaces can result in increased erosion and transport of surface matter into areas that support sensitive biological resources. Altered erosion, increased surface flows, and underground seepage can allow for the establishment of non-native plants. Changed hydrologic conditions can also alter seed bank characteristics and modify habitat for ground-dwelling fauna that may disperse seed.

The project would impact an existing detention basin but would not affect overall hydrology for the site, as the existing basin is isolated and lacks an effluent downstream connection.

Chemical and Particulate Pollution. The release of fuels, oils, sediment, and other construction-related chemicals into adjacent areas has the potential to impact downstream sensitive natural resources. Accidental spills of hazardous chemicals could contaminate the lake water and groundwater and indirectly affect wildlife species through poisoning or alteration of suitable habitat.

The proposed project would be subject to pollution-control standards and is not anticipated to result in chemical or particulate pollution.

Noise. Noise can have a variety of indirect impacts on wildlife species. These indirect impacts may include increased stress and weakened immune systems, altered foraging behavior, interference with adult birds communicating with fledglings, displacement due to startle, degraded communication with conspecifics, and increased vulnerability to predators (Lovich and Ennen 2011; Brattstrom and Bondello 1983, as cited in Lovich and Ennen 2011).

Construction noise from the proposed project has potential to affect wildlife breeding within the project site and the surrounding habitats. These impacts are addressed below.

Nighttime Lighting. Nighttime lighting can disrupt wildlife behavior and can attract certain species while deterring others. Additionally, nighttime lighting can improve visibility, attracting or assisting predators.

Construction is planned to occur during daylight hours, so no nighttime lighting is anticipated. The project would include lighting in the parking lot and for several of the outbuildings; however, lighting would be shielded and directed down, away from the adjacent undeveloped areas. Therefore, no impacts from nighttime lighting during regular operation of the facility are expected.

2.3 Cumulative Impacts

Cumulative impacts are those that may occur at a landscape or regional level as a result of past, current, and foreseeable projects within the cumulative study area. While impacts from one project may not be significant, when analyzed in concert with multiple projects in the area, impacts may compound and reach a level of significance. The project was designed to minimize new impacts, as it has been sited on a pad and adjacent to an existing development. All impacts to sensitive habitats and species would be mitigated to below a level of significance. The project would not affect the San Diego River. Therefore, when considered in conjunction with past and present projects located in the vicinity of the project, the project would not contribute to a cumulatively considerable impact.

2.4 Impacts to Habitats and Vegetation Communities

As shown on Figure 6 impacts would be limited to the southwestern portion of the project site. Impact acreages are presented in Table 2.

Table 2
Impacts to Vegetation Communities (acres)

Vegetation Community[1]	Total Survey Area	Project Site	Impacts
Tier I			
Vernal Pool (44000)	0.02	0.02	-
Disturbed Wetland (11200)	0.08	0.08	0.08
Tier II			
Disturbed Diegan Coastal Sage Scrub – Baccharis dominated (32530)	4.76	3.45	2.71
Tier IV			
Eucalyptus Woodland (79100)	0.52	0.45	-
Disturbed Habitat (11300)	9.27	6.57	1.79
Urban/Developed (12000)	3.62	0.02	-
Total	**18.27**	**10.59**	**4.58**

[1]Holland Codes (as modified by Oberbauer et al. 2008) shown in parentheses.

2.5 Impacts to Jurisdictional Wetlands and Waterways

As discussed in Section 1.4.7, the disturbed wetland located within the detention basin would not likely be considered a USACE, CDFW, or RWQCB jurisdictional wetland. The vernal pool would likely be considered a USACE and RWQCB wetland. The vernal pool lies 50 feet outside the impact footprint, and the project would maintain a 50-foot buffer from the vernal pool. As an existing manufactured slope lies between the vernal pool and the development area, the project would not alter the pool's watershed. Therefore, the proposed project would not impact any potential jurisdictional wetlands or waterways.

2.6 Impacts to Sensitive Species

This section discusses the direct and indirect impacts the project would have on sensitive species. As mentioned in Section 1.4.5, no sensitive plant species were detected or have potential to occur on-site. Therefore, none would be impacted. As discussed in Section 1.4.6, two sensitive wildlife species have moderate potential to occur and, therefore, could be impacted by the project. These are discussed below.

Cooper's hawk (nesting). Cooper's hawk has moderate potential to nest within the eucalyptus woodland in the northern portion of the survey area. These trees are located approximately 250 feet north of the project impact footprint. Thus, Cooper's hawks potentially nesting in these trees would not be directly impacted. The project would also impact Cooper's hawk foraging habitat through impacts to disturbed habitat and disturbed Diegan coastal sage scrub – Baccharis dominated. If construction occurs during the tree-nesting raptor breeding season (January 15 to July 15), construction noise could cause indirect impacts to Cooper's hawk if this species is determined to be nesting in the eucalyptus woodland.

San Diego black-tailed jackrabbit. San Diego black-tailed jackrabbit has moderate potential to occur in the disturbed habitat and Diegan coastal sage scrub – Baccharis dominated. The project would impact both of these vegetation communities, so it has potential to impact this species through loss of habitat. Individual jackrabbits are highly mobile and are generally expected to be able to avoid construction equipment. Thus, no direct impacts to San Diego black-tailed jackrabbit are anticipated.

San Diego Fairy Shrimp. As discussed in Section 1.4.6, this species has low potential to occur in the vernal pool on-site, although a definitive assessment of potential occurrence would require focused surveys, which were not conducted. As the pool is located approximately 50 feet outside of the impact footprint, this species would not be directly impacted by the project.

2.7 Impacts to Habitat Connectivity and Wildlife Corridors

As discussed in Section 1.4.8, the San Diego River represents a regional wildlife corridor through Santee, connecting undeveloped habitat in the unincorporated county to the east with habitat in Santee and the city of San Diego. The project is situated on a previously developed property on the edge of the urbanized area, and was historically in active agriculture. With project implementation, the wildlife corridor along the San Diego River would remain approximately 1,500 feet wide, which is not expected to hinder wildlife movement. As a result, the project is not anticipated to impact habitat linkages or corridors.

3.0 Special Status Species

This section addresses project impacts to sensitive plant and animal species.

3.1 Guidelines for the Determination of Significance

The project would have a substantial adverse effect, either directly or through habitat modifications, on one or more species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS if any of the following conditions are met:

A. The project would impact one or more individuals of a species listed as federally or state endangered or threatened.

B. The project would impact an on-site population of County List A or B plant species, or a County Group 1 animal species, or a species listed as a state species of special concern. Impacts to these species are considered significant; however, impacts of less than five percent of the individual plants or of the sensitive species' habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of that plant or animal taxon.

C. The project would impact the local long-term survival of a County List C or D plant species or a County Group 2 animal species.

D. The project may impact arroyo toad aestivation, foraging, or breeding habitat. Any alteration of suitable habitat within one kilometer (3,280 feet) in any direction of occupied breeding habitat or suitable stream segments (unless very steep slopes or other barriers constrain movement) could only be considered less than significant if a biologically-based determination can be made that the project would not impact the aestivation or breeding behavior of arroyo toads.

E. The project would impact golden eagle (*Aquila chrysaetos*) habitat. Any alteration of habitat within 4,000 feet of an active golden eagle nest could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the long-term survival of the identified pair of golden eagles.

F. The project would result in a loss of functional foraging habitat for raptors. Impacts to raptor foraging habitat is considered significant; however, impacts of less than five percent of the raptor foraging habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of any raptor species.

G. The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or supports multiple wildlife species. Alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the core areas and the species it supports.

H. The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term. The following issues should be addressed in determining the significance of indirect impacts:

- Increasing human access;
- Increasing predation or competition from domestic animals, pests, or exotic species;
- Altering natural drainage; and
- Increasing noise and/or nighttime lighting to a level above ambient that has been shown to adversely affect sensitive species.

I. The project would impact occupied burrowing owl habitat.

J. The project would impact occupied cactus wren habitat, or formerly occupied coastal cactus wren habitat that has been burned by wildfire.

K. The project would impact occupied Hermes copper habitat.

L. The project would impact nesting success of specific sensitive bird species (as listed in the Guidelines for Determining Significance) through grading, clearing, fire fuel modification, and/or noise generating activities such as construction.

3.2 Analysis of Project Effects

The project may result in impacts under the following conditions for the reasons discussed below. The letter listed below corresponds to the specific condition listed in Section 3.1.

B. No County List A or B plant species has potential to occur in the project site. Cooper's hawk and San Diego black-tailed jackrabbit are both state species of special concern, and Cooper's hawk is a County Group 1 species. As discussed in Section 1.4.6, neither of these species is expected to be directly impacted. Cooper's hawk has potential to nest approximately 250 feet from the impact area. Thus, this species has potential to be indirectly impacted by construction noise if construction occurs during the tree-nesting breeding season (January 15 to July 15). These impacts would be considered significant and require implementation of avoidance measures.

F. The project would permanently impact potential raptor foraging habitat (Diegan coastal sage scrub – Baccharis dominated and disturbed habitat). This impact represents more than half of the potential raptor foraging habitat on the project site. As this impact exceeds five percent of the raptor foraging habitat on the project site, it would be considered significant and would require mitigation.

H. The project occurs in a previously graded property and the adjacent portions of the project site outside the impact footprint are not part of an existing open space or natural habitat area. The San Diego River is 500 feet from the nearest edge of development. As discussed in Section 2.0, no indirect impacts from increased human activity, invasive species, hydrology alteration, chemical and particulate pollution, or nighttime lighting are expected. Construction noise has potential to impact migratory birds or tree-nesting raptors if these species are determined to be nesting within 300 feet of the impact area. These impacts would be considered significant and would require avoidance or mitigation measures.

L. The project would not affect breeding success of sensitive bird species due to grading, clearing, or fire fuel modification. As discussed in Section 2.6, the construction noise has potential to temporarily affect the nesting success of sensitive bird species, namely, Cooper's hawk. As discussed above if construction activities occur during the tree-nesting raptor breeding season (January 15 to July 15). These impacts would be considered significant and would require avoidance or mitigation measures.

The project would not result in significant impacts under the following conditions for the reasons discussed below.

A. The project would not impact any state or federally listed species.

C. No County List C or D plant species have potential to occur on the project site, so none would be impacted. One County Group 2 wildlife species – San Diego black-tailed jackrabbit – has potential to be impacted by the project. As described in Section 1.4.6, this species is not expected to be directly impacted by, but would be affected by loss of

habitat. This impact would be minor and would not threaten the survival of the local population. Therefore, the impact would be less than significant.

D. There are no records of arroyo toad within two miles of the project site (CDFW 2020a, USFWS 2020, County of San Diego 2020), and no habitat suitable habitat occurs within the survey area. Therefore, the project would not impact arroyo toad.

E. Golden eagle was not detected within the survey area, and there are no records of this species within two miles of the project site (CDFW 2020a, USFWS 2020, County of San Diego 2020). Therefore, the project would not impact golden eagle.

G. The project would not impact any habitat considered BRCA or PAMA. The habitat that would be impacted is highly disturbed and would not be considered a core wildlife area. As a result, the project would not impact the viability of any core wildlife areas.

I. No burrowing owls occur or are expected to occur within the project site due to a lack of suitable habitat, so no impacts would occur to this species.

J. No coastal cactus wrens occur or are expected to occur within the project site due to a lack of suitable habitat, so no impacts would occur to this species.

K. No Hermes copper butterflies occur or are expected to occur within the project site due to a lack of suitable habitat and host plant, so no impacts would occur to this species.

3.3 Cumulative Impact Analysis

Cumulative impacts from the project are evaluated with regard to past, present, and future projects within the project vicinity. While there would be some permanent loss of habitat for special status wildlife species, the project site was historically developed or in agriculture, and was graded in 2009, and has relatively low habitat value. Thus, the overall loss would be minimal and is not expected to contribute to cumulative loss of habitat for these species.

3.4 Mitigation Measures and Design Considerations

The following avoidance measures are recommended to prevent or reduce impacts to sensitive bird species, including Cooper's hawk and nesting migratory birds (Impact 3.2-B, H, and L), to below a level of significance. To avoid direct impacts to breeding migratory birds, vegetation removal, brush clearing, grading and all other construction should be conducted outside the general migratory bird breeding season of February 15 to August 31. To avoid indirect noise related impacts to tree-nesting raptors potentially occurring in the eucalyptus woodland should occur outside the tree-nesting raptor breeding season of January 15 to July 15. If construction must occur during these periods, the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for nesting migratory birds and raptors within 300 feet of the impact footprint prior to the

commencement of construction activities during the respective breeding seasons (February 15 to August 31 for migratory birds, January 15 to July 15 for raptors).

- If the aforementioned birds are not observed nesting within 300 feet of construction, no grading or construction restrictions would be required.
- If nesting birds are found, nests will be noted, and no grading or clearing shall occur within 300 feet of the active nest. Monitoring will occur to ensure that no nest is removed or disturbed until the young have fledged or the nest is no longer active.
- If construction must occur within 300 feet of an active nest, temporary sound barriers may be required or construction may be restricted near the nest site to reduce noise levels below an hourly average of 60 A-weighted decibels or ambient, whichever is greater. Any temporary sound barriers must be placed within the impact areas and not in the adjacent habitat.

Impacts to raptor foraging habitat (Impact 3.2-F) would be mitigated as part of the habitat-based mitigation discussed in Section 4.4.

3.5 Conclusions

With the proposed measures described above, Impacts 3.2-B, F, H, and L would be either avoided or mitigated to below a level of significance.

4.0 Riparian Habitat or Sensitive Natural Community

As discussed in Section 2.4, project implementation would permanently impact two sensitive vegetation communities: disturbed wetland and Diegan coastal sage scrub – Baccharis dominated (see Table 2).

4.1 Guidelines for the Determination of Significance

An adverse effect on any riparian habitat or other sensitive natural community is considered significant if any of the following conditions are met:

A. Project-related construction, grading, clearing, or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.

B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW, and the County: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation,

volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity, and abundance.

C. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.

D. The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive habitats over the long term. The following issues should be addressed in determining the significance of indirect impacts: increasing human access; increasing predation or competition from domestic animals, pests, or exotic species; altering natural drainage; and increasing noise and/or nighttime lighting to a level above ambient that has been shown by the best available science to adversely affect the functioning of sensitive habitats.

E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands. If the project is subject to the RPO, buffers of a minimum of 50 feet and a maximum of 200 feet to protect wetlands are required based on the best available science available to the County at the time of adoption of the ordinance.

4.2 Analysis of Project Effects

The project may result in impacts under the following conditions for the reasons discussed below. Each letter listed below corresponds to the specific condition listed in Section 4.1.

A. As discussed in Section 2.4 and shown in Table 2, the project would cause permanent impacts to disturbed wetland and Diegan coastal sage scrub – Baccharis dominated.

The project would not result in significant impacts under the following conditions for the reasons discussed below.

B. The project would not impact any potential wetlands as defined by USACE, CDFW, or RWQCB, and is exempt from the County RPO.

C. The project would consist of development on an existing graded pad and is not expected to draw down groundwater table. Therefore, it would have no impact on groundwater levels.

D. Indirect impacts to vegetation communities are detailed in Section 2.0. Based on that discussion, the project is not expected to substantially change the nature of the surrounding habitat or result in indirect impacts from increased human access; increased predation or competition from domestic animals, pests, or exotic species, or altered natural drainage patterns.

Indirect impacts from construction noise are addressed in Section 3.2, and would be avoided/mitigated through implementation of the measures described in Section 3.4. Following construction, operational noise levels (i.e. from traffic) are expected to be similar to the current noise levels, so there would be no impacts from construction or operational noise.

Construction activities are expected to occur during the day, so no construction lighting is anticipated. The project would include operational lighting for the parking lot and structural lighting for the animal shelter buildings and livestock areas. All project lighting would be shielded and directed away from the adjacent undeveloped areas. Therefore, there would be no impact from nighttime lighting.

E. The project is exempt from the RPO; however, it would include a 50-foot buffer from the vernal pool and would not affect its watershed. No other wetlands are located within 500 feet of the impact area. Therefore, the project would not impact wetland buffers.

4.3 Cumulative Impact Analysis

The proposed project would avoid impacts to riparian habitats but would cause permanent impacts to sensitive upland vegetation communities. These impacts would be minimal and would be mitigated following the ratios in the BMO. Thus, they are not expected to contribute to any cumulative loss of habitat.

4.4 Mitigation Measures and Design Considerations

Impacts to sensitive natural communities (Impact 4.2-A) would be considered significant. The following mitigation measures would be required to reduce this impact to below a level of significance.

A. Permanent impacts to sensitive vegetation communities would require mitigation in the form of enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area; or other off-site preservation. Mitigation requirements are detailed in Table 3.

Table 3
Mitigation for Impacts to Sensitive Vegetation Communities (acres)

Vegetation Community[1]	Impacts	Mitigation Ratio[1]	Required Mitigation
Tier I			
Vernal Pool (44000)	-	-	-
Disturbed Wetland (11200)	0.08	1:1	0.08
Tier II			
Disturbed Diegan Coastal Sage Scrub – Baccharis dominated (32530)	2.71	1:1	2.71
Total	**2.79**		**2.79**

[1]Mitigation ratios assume mitigation would occur at a site that meets the criteria for BRCA; if not, a higher mitigation ratio would be applied.

4.5 Conclusions

Project implementation would result in permanent impacts to sensitive native or naturalized habitat. These impacts would be mitigated in the form of enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area; or other off-site preservation at a location that meets the criteria for a BRCA. With these mitigation measures, project impacts to sensitive native or naturalized habitats would be reduced to below a level of significance.

5.0 Jurisdictional Wetlands and Waterways

As discussed in Section 2.5, the project would not impact any potential jurisdictional wetlands or waterways.

5.1 Guidelines for the Determination of Significance

The project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the federal CWA (including, but not limited to, marsh, vernal pool, coastal, and so on) through direct removal, filling, hydrological interruption, or other means. These criteria correspond to Criteria B, C, and E in Section 4.2, above:

A. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW, and the County: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity, and abundance.

B. The project draws down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.

C. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.

5.2 Analysis of Project Effects

The project would not result in significant impacts under the following conditions for the reasons discussed below.

A. The proposed project would is not expected to impact any potential jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW, or RWQCB.

B. The project would not affect groundwater levels or draw down the water table to the detriment of groundwater-dependent habitat.

C. The proposed project would be constructed primarily on an existing graded pad, with the nearest edge of the construction footprint remaining 50 feet south of the vernal pool. Thus, the project would maintain a 50-foot buffer from this artificially created vernal pool. The project would maintain an approximately 500-foot buffer from the San Diego River. Thus, there would be no impact to wetland buffers.

5.3 Cumulative Impact Analysis

There would be no impacts to wetlands or waters. Therefore, the project would not contribute to any cumulative loss of jurisdictional wetlands or waters.

5.4 Mitigation Measures and Design Considerations

The proposed project would not cause impacts to jurisdictional waters as defined by the USACE, CDFW, or RWQCB. Therefore, no mitigation would be required.

5.5 Conclusions

Project implementation would not result in impacts to potential USACE, CDFW, and RWQCB jurisdictional wetlands. Therefore, no mitigation would be required.

6.0 Wildlife Movement and Nursery Sites

This section addresses potential project impacts to wildlife movement, corridors, and nursery sites.

6.1 Guidelines for the Determination of Significance

Project-related interference with the movement of any native resident, migratory fish, or wildlife species, with established native resident or migratory wildlife corridors, or with the use of native wildlife nursery sites would be considered significant if any of the following conditions are met:

A. The project would impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

B. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.

C. The project would create artificial wildlife corridors that do not follow natural movement patterns.

D. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.

E. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

F. The project does not maintain adequate visual continuity (i.e., long lines-of-sight) within wildlife corridors or linkage.

6.2 Analysis of Project Effects

The project would not result in significant impacts under the following conditions for the reasons discussed below.

A. The project site was historically developed, in agriculture, and graded, and the habitat on-site is highly disturbed. Project development would not impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

B. The project is situated on a previously developed property on the edge of the urbanized area and was historically in active agriculture. With project implementation, the wildlife corridor along the San Diego River would remain approximately 1,500 feet wide. Project construction is not expected to interfere with connectivity between blocks of habitat to the east and west of the site, or interfere with a local or regional wildlife corridor or linkage.

C. The project would not create any artificial wildlife corridors.

D. As discussed in Sections 2.0 and 3.4, nighttime lighting during the construction and operational phases of the project would not cause a significant impact within a wildlife corridor or linkage. Operational noise levels are not anticipated to be substantially different from current noise levels. While construction noise has potential to impact bird species breeding within 300 feet of the project site, it is not expected to affect wildlife use of the San Diego River corridor, which lies approximately 500 feet away. Moreover most movement by medium- and large-sized wildlife species is expected to occur in during the night, when construction would not be occurring. Thus, noise and lighting are not expected to impact wildlife movement within a corridor.

E. The project lies at least 500 feet from the San Diego River, and following construction, the overall corridor width at the project site would remain 1,500 feet. This is more

than twice the width of the corridor to the east of North Magnolia Avenue and west of Cuyamaca Street. Thus, the project is not expected to cause an impact by reducing or constraining the wildlife corridor.

F. The project would not impact visual continuity within the wildlife corridor.

6.3 Cumulative Impact Analysis

The project would not alter the width, continuity, or accessibility of the wildlife corridor along the San Diego River. As a result, there would be no cumulative impact.

6.4 Mitigation Measures and Design Considerations

Project effects on wildlife movement and nursery sites would be considered less than significant and no mitigation measures would be required.

6.5 Conclusions

Project effects on wildlife movement and nursery sites would be considered less than significant and no mitigation measures would be required.

7.0 Local Policies, Ordinances, and Adopted Plans

This section addresses project compliance with local policies, ordinances, and adopted plans.

7.1 Guidelines for the Determination of Significance

If this project conflicts with any local policies or ordinances protecting biological resources or with the provisions of an adopted habitat conservation plan (HCP), NCCP, or other approved local, regional, or state habitat conservation plan, any of the following conditions would be considered significant:

A. For lands outside of the MSCP, the project would impact coastal sage scrub vegetation in excess of the County's 5 percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub NCCP Process Guidelines.

B. The project would preclude or prevent the preparation of the subregional NCCP Process. For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.

C. The project will impact any amount of sensitive habitat lands as outlined in the RPO.

D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Process Guidelines.

E. The project does not conform to the goals and requirements as outlined in any applicable HCP, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort.

F. For lands within the MSCP, the project would not minimize impacts to BRCAs as defined in the BMO.

G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Process Guidelines.

H. The project does not maintain existing movement corridors and/or habitat linkages as defined by the BMO.

I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.

J. The project would reduce the likelihood of survival and recovery of listed species in the wild.

K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).

L. The project would result in the take of eagles, eagle eggs, or any part of an eagle (Bald and Golden Eagle Protection Act).

7.2 Analysis of Project Effects

The project would not result in significant impacts under the following conditions for the reasons discussed below.

A. The project would impact disturbed Diegan coastal sage scrub – Baccharis dominated. This impact is not expected to result in an excess of the County's 5 percent habitat loss threshold.

B. The project would comply with the County's guidelines and would not conflict with the MSCP Subarea Plan, Biology Guidelines, or BMO (County of San Diego 1997, 2010b, 2010c, respectively). Thus, the project would not affect the subregional NCCP Process or hinder the value of the site as a preserve.

C. The project does not fall under any of the categories of discretionary action subject to the RPO (per Section 86.603 in County of San Diego 1991), and, as noted in Section 1.5.3, the RPO is not applicable. Consequently, this criterion does not apply.

D. The project would avoid impact to Diegan coastal sage scrub vegetation to the degree feasible, and the habitat that would be impacted is highly disturbed. All impacts would be mitigated at a 1:1 ratio. As a result, the project would comply with Section 4.3 of the NCCP Process Guidelines.

E. The project would comply with the regulations under the County's MSCP Subarea Plan (County of San Diego 1997), and no other HCP, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort would apply.

F. The project is not located within the MSCP boundaries. Even so, it would not impact any habitat that would meet the definition of a BRCA and all impacts would be mitigated at the ratios presented in the BMO. Therefore, no significant impact would occur.

G. The project would not preclude connectivity between areas of high value habitat. Therefore, no significant impact would occur.

H. The project would not constrain or impede wildlife movement corridors or linkages. Therefore, no significant impact would occur.

I. Implementation of the project would not result in impacts to narrow endemic species. Therefore, no significant impact would occur.

J. The project would not impact any listed species and would not affect the likelihood of survival and recovery of any sensitive species Therefore, no significant impact would occur.

K. If vegetation clearing occurs during the breeding season of February 15 to August 31, direct impact could occur to nesting migratory birds protected by the CFGC. Tree-nesting raptors, including Cooper's hawk, do not have potential to nest in the project footprint and would not be directly impacted. Although the MBTA is no longer interpreted to protect migratory birds and raptors from incidental take (U.S. Department of the Interior 2017), CFGC 3503 and 3503.5 still provide such protections. The avoidance measures described in Section 3.4 would be implemented to prevent killing of any migratory birds or destruction of active migratory bird nests. Therefore, no impacts to nesting birds would occur.

L. No bald or golden eagles were observed or are expected to occur within the project site. Therefore, no impacts to these species would occur.

7.3 Cumulative Impact Analysis

Through project design and project-specific mitigation measures, the project would comply with local policies, ordinances, and adopted plans to ensure that impacts to biological resources are avoided, minimized, and mitigated according to guidelines established by these regulations. Thus, there would be no cumulative impact.

7.4 Mitigation Measures and Design Considerations

The avoidance measures described in Sections 3.4 and 4.4 would be implemented to prevent direct impacts to nesting birds (Impact 7.2-K).

7.5 Conclusions

With implementation of the avoidance and mitigation measures described in Sections 3.4, the project would be consistent with local policies, ordinances, and adopted plans.

8.0 Summary of Project Impacts and Mitigation

8.1 Special Status Species

The project has potential to cause direct impacts to nesting migratory birds and indirect noise impacts to nesting migratory birds, Cooper's hawks, and other tree-nesting raptors (Impacts 3.2-B, H, and L). The following measures would be implemented to reduce this impact to below a level of significance:

To avoid impacts to breeding migratory birds, vegetation removal, brush clearing, grading and all other construction should be conducted outside the general migratory bird breeding season of February 15 to August 31. To avoid indirect noise-related impacts to tree-nesting raptors potentially occurring in the eucalyptus woodland, construction should occur outside the tree-nesting raptor breeding season of January 15 to July 15. If construction must occur during these periods, the following actions would be required:

- A qualified biologist shall conduct a pre-construction clearance survey for nesting migratory birds and raptors within 300 feet of the impact footprint prior to the commencement of construction activities during the respective breeding seasons (February 15 to August 31 for migratory birds, January 15 to July 15 for raptors).
- If the aforementioned birds are not observed nesting within 300 feet of construction, no grading or construction restrictions would be required.
- If nesting birds are found, nests will be noted, and no grading or clearing shall occur within 300 feet of the active nest. Monitoring will occur to ensure that no nest is removed or disturbed until the young have fledged or the nest is no longer active.
- If construction must occur within 300 feet of an active nest, temporary sound barriers may be required or construction may be restricted near the nest site to reduce noise levels below an hourly average of 60 A-weighted decibels or ambient, whichever is greater. Any temporary sound barriers must be placed within the impact areas and not in the adjacent habitat.

Impacts to raptor foraging habitat (Impact 3.2-F) would be mitigated through habitat-based mitigation, as discussed in Section 4.4 and below, in Section 8.2.

8.2 Riparian Habitat or Sensitive Natural Community

The project would cause impacts to sensitive natural communities (Impact 4.2-A). Permanent impacts to sensitive vegetation communities would require mitigation in the form of enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area; or other off-site preservation.

8.3 Jurisdictional Wetlands and Waterways

The project would not impact jurisdictional wetlands or waterways, so no mitigation would be required.

8.4 Wildlife Movement and Nursery Sites

The project would not impact wildlife movement or nursery sites, so no mitigation would be required.

8.5 Local Policies, Ordinances, and Adopted Plans

The project has potential to cause direct and indirect impacts to migratory bird species (Impact 7.2-K). The avoidance measures described in Sections 3.4 and 4.4 would be implemented to prevent and reduce these impacts to below a level of significance.

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10.0 List of Preparers

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ATTACHMENTS

ATTACHMENT 1

Plant Species Observed

Attachment 1 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
PINACEAE	**PINE FAMILY**		
Pinus halepensis	Aleppo pine	DH	I
POACEAE	**GRASS FAMILY**		
Avena sp.	oats	DH	I
Bromus diandrus	ripgut grass	DH	I
Bromus madritensis ssp. *rubens*	red brome	DW, EW	I
Cynodon dactylon	Bermuda grass	DH, DW	I
Hordeum murinum	wall barley	DH	I
Schismus barbatus	Mediterranean schismus	DH, DW, DCSS, EW	I
ANACARDIACEAE	**SUMAC OR CASHEW FAMILY**		
Malosma laurina	laurel sumac	DCSS	N
Schinus molle	Peruvian pepper tree	EW	I
ASTERACEAE	**SUNFLOWER FAMILY**		
Ambrosia psilostachya	western ragweed	DH	N
Baccharis pilularis	coyote brush	DCSS	N
Baccharis salicifolia ssp. *salicifolia*	mule fat	DH	N
Baccharis sarothroides	broom baccharis	DCSS	N
Centaurea melitensis	tocalote	DH, DCSS	I
Corethrogyne filaginifolia	California-aster	DCSS	N
Dittrichia graveolens	stinkwort	DH, DW	I
Erigeron [=*Conyza*] *canadensis* L.	horseweed	DH	N
Heterotheca grandiflora	telegraph weed	DH	N
Hypochaeris glabra	smooth cat's-ear	DH, DW, DCSS, EW	I
Isocoma menziesii	coastal goldenbush	DCSS	N
Pseudognaphalium californicum	California everlasting	EW	N
Psilocarphus brevissimus var. *brevissimus*	dwarf woollyheads	VP	N
Sonchus oleraceus	common sow thistle	EW	I
Stephanomeria sp.	wreath-plant	DCSS	N
Xanthium strumarium	cocklebur	DW	N
BORAGINACEAE	**BORAGE FAMILY**		
Amsinckia menziesii	common fiddleneck	DH, DCSS	N
Pectocarya linearis sp.	comb-bur	DH, EW	N
Plagiobothrys sp.	popcornflower	DH	N
BRASSICACEAE	**MUSTARD FAMILY**		
Hirschfeldia incana	short-pod mustard	DH, EW	I
CRASSULACEAE	**STONECROP FAMILY**		
Crassula connata	pygmy-weed	DH	N
EUPHORBIACEAE	**SPURGE FAMILY**		
Croton setiger	dove weed	DCSS	N
FABACEAE	**LEGUME FAMILY**		
Acmispon glaber	deerweed	DH, DCSS	N
Lupinus concinnus	bajada lupine	DH	N
Melilotus indicus	sourclover	DH, DW, DCSS	I
FAGACEAE	**OAK FAMILY**		
Quercus agrifolia	coast live oak	DH	N

Attachment 1 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
GERANIACEAE	**GERANIUM FAMILY**		
Erodium botrys	long-beak filaree	DH, DW, DCSS, VP	I
Erodium cicutarium	redstem filaree	DH, EW	I
LYTHRACEAE	**LOOSESTRIFE FAMILY**		
Lythrum hyssopifolia	grass poly	VP, DW	I
MYRTACEAE	**MYRTLE FAMILY**		
Eucalyptus sp.	gum	EW	I
Eucalyptus polyanthemos	silver dollar gum	EW	I
ONAGRACEAE	**EVENING-PRIMROSE FAMILY**		
Camissoniopsis sp.	sun cup	DH	N
POLYGONACEAE	**BUCKWHEAT FAMILY**		
Rumex crispus	curly dock	DW	I
SALICACEAE	**WILLOW FAMILY**		
Salix sp.	willow	DW	N
SOLANACEAE	**NIGHTSHADE FAMILY**		
Nicotiana glauca	tree tobacco	DH, EW	I
TAMARICACEAE	**TAMARISK FAMILY**		
Tamarix sp.	tamarisk	DW	I
URTICACEAE	**NETTLE FAMILY**		
Urtica dioica ssp. *holosericea*	hoary nettle	DH	N

HABITATS
DH = Disturbed habitat
DW = Disturbed wetland
DCSS = Diegan coastal sage scrub - Baccharis dominated
EW = Eucalyptus woodland
VP = Vernal Pool

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

ATTACHMENT 2

Wildlife Species Observed

Attachment 2 Wildlife Species Observed			
Scientific Name	Common Name	Occupied Habitat	Evidence of Occurrence
INVERTEBRATES			
FORMICIDAE	**ANTS**		
Pogonomyrmex sp.	harvester ant	DH	O, N
PAPILIONIDAE	**PARNASSIANS & SWALLOWTAILS**		
Papilio zelicaon	anise swallowtail	EW	O
TENEBRIONIDAE	**DARKLING BEETLES**		
Not identified to species	darkling beetle	DH	O
NYMPHALIDAE	**BRUSH-FOOTED BUTTERFLIES**		
Junonia coenia grisea	common buckeye	DCSS	O
REPTILES			
PHRYNOSOMATIDAE	**SPINY LIZARDS**		
Uta stansburiana	common side-blotched lizard	DCSS, EW	O
BIRDS			
TROCHILIDAE	**HUMMINGBIRDS**		
Calypte anna	Anna's hummingbird	DCSS, DH	O, A
TYRANNIDAE	**TYRANT FLYCATCHERS**		
Sayornis nigricans semiatra	black phoebe	DCSS, EW	O, A
CORVIDAE	**CROWS, JAYS, & MAGPIES**		
Corvus brachyrhynchos hesperis	American crow	OH	O
AEGITHALIDAE	**BUSHTIT**		
Psaltriparus minimus melanurus	bushtit	DCSS	A
PARULIDAE	**WOOD WARBLERS**		
Melospiza melodia	song sparrow	EW	A
FRINGILLIDAE	**FINCHES**		
Spinus psaltria hesperophilus	lesser goldfinch	EW	A
Haemorhous mexicanus frontalis	house finch	EW, DH	A
MAMMALS			
LEPORIDAE	**RABBITS & HARES**		
Sylvilagus audubonii	desert cottontail	DCSS, DH	O, S
SCIURIDAE	**SQUIRRELS & CHIPMUNKS**		
Spermophilus beecheyi	California ground squirrel	DH, EW	B
GEOMYIDAE	**POCKET GOPHERS**		
Thomomys bottae	Botta's pocket gopher	DH	B
CANIDAE	**CANIDS**		
Canis latrans	coyote	DW, DCSS, DH	T
Canis familiaris	domestic dog (I)	DCSS	T

(I) = Introduced species

HABITATS

DCSS = Disturbed Diegan coastal sage scrub – Baccharis dominated
DH = Disturbed habitat
DW = Disturbed wetland
EW = Eucalyptus woodland
OH = Overhead

EVIDENCE OF OCCURRENCE

B = Burrow
N = Nest
O = Observed
S = Scat
T = Track
V = Vocalization

ATTACHMENT 3

Sensitive Plant Species Observed or with the Potential to Occur

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status State/ Federal Status	 CNPS Rank	 County of San Diego	Habitat Preference/ Requirements	Verified On-Site Yes/No	Potential to Occur On-Site	Factual Basis for Determination of Occurrence Potential
BRYOPHYTES							
ASTERACEAE **SUNFLOWER FAMILY**							
Ambrosia pumila San Diego ambrosia	–/FE	1B.1	NE, MSCP List A	Perennial herb (rhizomatous); chaparral, coastal sage scrub, valley and foothill grasslands, creek beds, vernal pools, often in disturbed areas; blooms May–September; elevation less than 1,400 feet. Many occurrences extirpated in San Diego County.	No	Low	The habitat on-site is marginally suitable due to the presence of a vernal pool and disturbed Diegan coastal sage scrub – Baccharis dominated. While the survey was conducted outside of the blooming period for this species, the vegetative portion of the plant can persist after senescing and would have been apparent during the surveys. There are numerous records of this species within 2 miles of the project site, most of which are along the San Diego river or other riparian areas (CDFW 2020a).
Centromadia [=*Hemizonia*] *pungens* ssp. *laevis* smooth tarplant	–/–	1B.1	List A	Annual herb; chenopod scrub, meadow and seeps, playas, riparian woodland, valley and foothill grasslands; alkaline soils; blooms April–September; elevation less than 2,100 feet. California endemic. Known from San Diego, Riverside, and San Bernardino counties.	No	Low	This species is not expected to occur due to a lack of suitable habitat and soils. This species was reported within the Santee Town Square property 0.5 mile to the southwest of the project site and adjacent to Gillespie Field 1.25 miles to the southwest (CDFW 2020a)

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat Preference/ Requirements	Verified On-Site Yes/No	Potential to Occur On-Site	Factual Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
Isocoma menziesii var. *decumbens* decumbent goldenbush	–/–	1B.2	List A	Perennial shrub; chaparral, coastal sage scrub; sandy soils, often in disturbed areas; blooms April–November; elevation less than 500 feet.	No	Not Expected	While suitable habitat for this species occurs within the survey area, this species was not observed and would have been apparent during general surveys.
BORAGINACEAE BORAGE FAMILY							
Harpagonella palmeri Palmer's grapplinghook	–/–	4.2	List B	Annual herb; chaparral, coastal sage scrub, valley and foothill grasslands; clay soils; blooms March–May; elevation less than 3,200 feet. Inconspicuous and easily overlooked.	No	Low	While potentially suitable habitat for this species does occur within the survey area, this species was not observed and would have been apparent during general surveys.
CACTACEAE CACTUS FAMILY							
Ferocactus viridescens San Diego barrel cactus	–/–	2B.1	MSCP List B	Perennial stem succulent; chaparral, coastal sage scrub, valley and foothill grasslands, vernal pools; blooms May–June; elevation less than 1,500 feet.	No	Not Expected	While potentially suitable habitat for this species does occur within the survey area, this species was not observed and would have been apparent during general surveys.
CRASSULACEAE STONECROP FAMILY							
Dudleya variegata variegated dudleya	–/–	1B.2	NE, MSCP List A	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms May–June; elevation less than 1,900 feet.	No	Not Expected	While potentially suitable habitat for this species does occur within the survey area, this species was not observed and would have been apparent during general surveys.

Attachment 3 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status State/ Federal Status	CNPS Rank	County of San Diego	Habitat Preference/ Requirements	Verified On-Site Yes/No	Potential to Occur On-Site	Factual Basis for Determination of Occurrence Potential
FAGACEAE **OAK FAMILY**							
Quercus dumosa Nuttall's scrub oak	–/–	1B.1	List A	Perennial evergreen shrub; closed-cone coniferous forest, coastal chaparral, coastal sage scrub; sandy and clay loam soils; blooms February–March; elevation less than 1,300 feet.	No	Not Expected	While potentially suitable habitat for this species does occur within the survey area, this species was not observed and would have been apparent during general surveys.
THEMIDACEAE **BRODIAEA FAMILY**							
Bloomeria clevelandii San Diego goldenstar	–/–	1B.1	MSCP List A	Perennial herb (bulbiferous); chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; clay soils; blooms May; elevation 170–1,500 feet.	No	Low	This species has a low potential to occur within the survey area due to a lack of suitable soils within potentially suitable habitat.

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

FEDERAL CANDIDATES AND LISTED PLANTS

FE = Federally listed endangered
FT = Federally listed threatened
FC = Federal candidate for listing as endangered or threatened

STATE LISTED PLANTS

CE = State listed endangered
CR = State listed rare
CT = State listed threatened

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

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

COUNTY OF SAN DIEGO

NE = Narrow endemic
MSCP = Multiple Species Conservation Program covered species
List A = Plants rare, threatened or endangered in California and elsewhere
List B = Plants rare, threatened or endangered in California but more common elsewhere
List C = Plants which may be rare, but need more information to determine their true rarity status
List D = Plants of limited distribution and are uncommon, but not presently rare or endangered

ATTACHMENT 4

Sensitive Wildlife Species Occurring or with the Potential to Occur

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
INVERTEBRATES					
BRANCHINECTIDAE **FAIRY SHRIMP**					
San Diego fairy shrimp *Branchinecta sandiegonensis*	FE, MSCP, Group 1	Vernal pools.	No	Low	One vernal pool occurs within the survey area. The pool appears to have been artificially created and to be shallow; however, it ponded following heavy rains in March 2020. The pool likely does not remain inundated for long enough to support this species, but focused surveys would be required to make a conclusive determination. This species has not been reported within 2 miles of the survey area (CDFW 2020a).
STREPTOCEPHALIDAE **FAIRY SHRIMP**					
Riverside fairy shrimp *Streptocephalus woottoni*	FE, MSCP, Group 1	Vernal pools.	No	Not Expected	Although focused surveys were not conducted, this species is not expected to occur on-site because it requires deep pools that remain cooler and inundated for longer periods of time. The vernal pool on-site is too shallow to provide suitable thermal conditions and unlikely to remain inundated for long enough to support this species' life cycle. This

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
					species has not been reported within 2 miles of the survey area (CDFW 2020a).
AMPHIBIANS AND REPTILES					
PELOBATIDAE **SPADEFOOT TOADS**					
Western spadefoot *Spea hammondii*	CSC, Group 2	Vernal pools, floodplains, and alkali flats within areas of open vegetation.	No	Low	Although a vernal pool and a phase of Diegan coastal sage scrub occur on-site, they are is highly disturbed and largely unsuitable. The vernal pool is also small and very shallow, limiting its potential to support toads. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
IGUANIDAE **IGUANID LIZARDS**					
Coast horned lizard *Phrynosoma blainvillii 4*	CSC, MSCP, Group 2	Chaparral, coastal sage scrub with fine, loose soil. Partially dependent on harvester ants for forage.	No	Low	While a phase of Diegan coastal sage scrub and harvester ants occur within the survey area, the habitat is highly disturbed and mostly unsuitable for this species. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
SCINCIDAE SKINKS					
Coronado skink *Plestiodon skiltonianus interparietalis*	CSC, Group 2	Grasslands, open woodlands and forest, broken chaparral. Rocky habitats near streams.	No	Low	Although there are records of this species in the vicinity of the project area (CDFW 2020a), the habitat on-site is highly disturbed and mostly unsuitable.
TEIIDAE WHIPTAIL LIZARDS					
Belding's orange-throated whiptail *Aspidoscelis hyperythra beldingi*	CSC, MSCP, Group 2	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.	No	Low	There is a low potential for this species to occur within the survey area due to the presence of potentially suitable habitat but lack of coarse sandy soils. This species is known to occur in the vicinity of the survey area (CDFW 2020a).
Coastal whiptail *Aspidoscelis tigris stejnegeri*	CSC, Group 2	Coastal sage scrub, chaparral, woodlands, and streamsides where plants are sparsely distributed.	No	Low	There is a low potential for this species to occur within the survey area due to the presence of potentially suitable habitat but lack of coarse sandy soils. This species is known to occur in the vicinity of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
ANNIELLIDAE LEGLESS LIZARDS					
San Diegan legless lizard *Anniella stebbensi*	CSC	Herbaceous layers with loose soil in coastal scrub, chaparral, and open riparian. Prefers dunes and sandy washes near moist soil.	No	Not Expected	This species is not expected to occur due to lack of suitable habitat and soils. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
BOIDAE BOAS					
Rosy boa *Lichanura orcutti* [=*trivirgata roseofusca*]	Group 2, *	Coastal sage scrub, chaparral in inland and desert locales with rocky soils.	No	Not Expected	This species is not expected to occur due to lack of suitable habitat and soils. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
COLUBRIDAE COLUBRID SNAKES					
California glossy snake *Arizona elegans occidentalis*	CSC	Scrub and grassland habitats, often with loose or sandy soils.	No	Not Expected	Although the site supports a phase of coastal sage scrub, it is highly disturbed, has been historically graded, and lacks a sandy substrate. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
San Diego ring-necked snake *Diadophis punctatus similis*	Group 2, *	Rocky areas in wet locales, such as swamps, damp forests, or riparian woodlands.	No	Not Expected	This species is not expected to occur due to the lack of suitable habitat and soils. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
Two-striped gartersnake *Thamnophis hammondii*	CSC, Group 1	Permanent freshwater streams with rocky bottoms. Mesic areas.	No	Not Expected	This species is not expected to occur due to the lack of suitable freshwater streams. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
CROTALIDAE RATTLESNAKES					
Red diamond rattlesnake *Crotalus ruber*	CSC, Group 2	Desert scrub and riparian, coastal sage scrub, open chaparral, grassland, and agricultural fields.	No	Low	The Diegan coastal sage scrub – Baccharis dominated is largely too disturbed to provide suitable habitat or cover for this species. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
BIRDS					
ARDEIDAE HERONS & BITTERNS					
Least bittern *Ixobrychus exilis*	CSC, Group 2	Brackish and freshwater marshes in the coastal lowland. Rare summer resident, rare in winter.	No	Not Expected	This species is not expected to occur due to the lack of suitable habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
ACCIPITRIDAE HAWKS, KITES, & EAGLES					
Cooper's hawk (nesting) *Accipiter cooperii*	WL, MSCP, Group 1	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.	No	Moderate	The project site has a patch of tall eucalyptus trees that are marginally suitable for nesting; however, the trees are situated at the edge of a busy roadway. Higher quality nesting opportunities are available at the San Diego River to the north. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
Swainson's hawk (nesting) *Buteo swainsoni*	CT, MSCP, Group 1	Plains, range, open hills, sparse trees. Uncommon spring migrant. Local breeding population now extirpated.	No	Not Expected	This species is not expected to occur due to the lack of suitable nesting habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
FALCONIDAE FALCONS & CARACARAS					
Prairie falcon (nesting) *Falco mexicanus*	WL, Group 1	Grassland, agricultural fields, desert scrub. Uncommon winter resident. Rare breeding resident.	No	Not Expected	This species is not expected to occur due to the lack of suitable nesting habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
VIREONIDAE VIREOS					
Least Bell's vireo (nesting) *Vireo bellii pusillus*	FE, CE, MSCP, Group 1	Willow riparian woodlands. Summer resident.	No	Not Expected	This species is not expected to occur due to the lack of suitable riparian habitat on-site. This species has been reported in the San Diego River, which lies approximately 500 feet to the north of the development footprint (CDFW 2020a). No areas suitable for this species occur between the San Diego River and the project area.
TROGLODYTIDAE WRENS					
Coastal cactus wren *Campylorhynchus brunneicapillus sandiegensis*	CSC, MSCP, Group 1	Maritime succulent scrub, coastal sage scrub with *Opuntia* thickets. Rare localized resident.	No	Not Expected	This species is not expected to occur due to the lack of suitable habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
POLIOPTILIDAE GNATCATCHERS					
Coastal California gnatcatcher *Polioptila californica californica*	FT, CSC, MSCP, Group 1	Coastal sage scrub, maritime succulent scrub. Resident.	No	Not Expected	The Diegan coastal sage scrub – Baccharis dominated within the survey area is too sparse and lacks suitable diversity or structure to support this species. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
PASSERELLIDAE NEW WORLD PASSERINES					
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	WL, MSCP, Group 1	Coastal sage scrub, chaparral, grassland. Resident.	No	Not Expected	The Diegan coastal sage scrub – Baccharis dominated within the survey area is too sparse and lacks suitable diversity or structure to support this species. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
Grasshopper sparrow (nesting) *Ammodramus savannarum*	CSC, Group 1	Tall grass areas. Localized summer resident, rare in winter.	No	Not Expected	This species is not expected to occur due to the lack of suitable grassland habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
ICTERIDAE BLACKBIRDS & NEW WORLD ORIOLES					
Tricolored blackbird *Agelaius tricolor*	CSC, MSCP, Group 1	Freshwater marshes, agricultural areas, lakeshores, parks. Localized resident.	No	Not Expected	This species is not expected to occur due to the lack of suitable habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
MAMMALS					
VESPERTILIONIDAE VESPER BATS					
Pallid bat *Antrozous pallidus*	CSC, Group 2	Arid deserts and grasslands. Shallow caves, crevices, rock outcrops, buildings, tree cavities. Especially near water. Colonial. Audible echolocation signal.	No	Not Expected	This species is not expected to occur due to the lack of suitable habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
MOLOSSIDAE FREE-TAILED BATS					
Pocketed free-tailed bat *Nyctinomops femorosaccus*	CSC, Group 2	Normally roost in crevice in rocks, slopes, cliffs. Lower elevations in San Diego and Imperial Counties. Colonial. Leave roosts well after dark.	No	Not Expected	This species is not expected to occur due to the lack of suitable roosting habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
Big free-tailed bat *Nyctinomops macrotis*	CSC, Group 2	Rugged, rocky terrain. Roost in crevices, buildings, caves, tree holes. Very rare in San Diego County. Colonial. Migratory.	No	Not Expected	This species is not expected to occur due to the lack of suitable roosting habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
LEPORIDAE RABBITS & HARES					
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	CSC, Group 2	Open areas of scrub, grasslands, agricultural fields.	No	Moderate	The Diegan coastal sage scrub – Baccharis dominated within the survey area is suitable to support this species. This species has been reported within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential
MURIDAE **OLD WORLD MICE & RATS (I)**					
San Diego desert woodrat *Neotoma lepida intermedia*	CSC, Group 2	Coastal sage scrub and chaparral.	No	Not Expected	Habitat on site is too disturbed and sparse to support this species. Additionally, no middens were detected. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).
MUSTELIDAE **WEASELS, OTTERS, & BADGERS**					
American badger *Taxidea taxus*	CSC, MSCP, Group 2	Grasslands, Sonoran desert scrub.	No	Low	This species is not expected to occur due to the lack of suitable habitat. This species has been known to occur within 2 miles of the survey area (CDFW 2020a).

Attachment 4 Sensitive Wildlife Species Occurring or with the Potential to Occur					
Species' Common Name/ Scientific Name	Listing Status	Habitat Preference/ Requirements	Detected On-Site?	Potential to Occur On-Site?	Basis for Determination of Occurrence Potential

(I) = Introduced species

STATUS CODES

Listed/Proposed

FE = Listed as endangered by the federal government
FT = Listed as threatened by the federal government
CE = Listed as endangered by the CDFW
CT = Listed as threatened by the CDFW

Other

CSC = California Department of Fish and Wildlife species of special concern
WL = California Department of Fish and Wildlife watch list species
MSCP = City and County of San Diego Multiple Species Conservation Program covered species
Group 1 = County of San Diego species that have a very high level of sensitivity
Group 2 = County of San Diego species that are less common, but are not in immediate threat of extirpation or extinction
* = Taxa listed with an asterisk fall into one or more of the following categories:

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