

Appendix B
Biological Letter Report
(December 7, 2020)

December 7, 2020

11575

John R. Tschudin, Jr.
Director – Design & Construction
Encompass Health
9001 Liberty Parkway
Birmingham, Alabama 35242

Subject: *Biology Letter Report for Encompass Health Chula Vista, City of Chula Vista, California*

Dear Mr. Tschudin:

This letter report provides an analysis of potential biological resource impacts associated with Encompass Health Chula Vista (proposed project) located in the City of Chula Vista (City), California (Assessor's Parcel Number 644-040-01-00). This biology letter report also includes a discussion of any potential biological resources that may be subject to regulation under the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (Subarea Plan) (City of Chula Vista 2003).

Project Location

The property (i.e., on-site; Assessor's Parcel Number 644-040-01-00) occupies 9.79 acres and is located approximately 0.2 miles east of Interstate 805 between Main Street and Olympic Parkway (Figure 1, Project Location). The project also includes an off-site impact area of 0.22 acre located along the southeastern corner of the site where future utility connections may occur, making the total study area acreage for the project 10.01 acres. The site is located on Shinohara Lane accessed from Brandywine Avenue and is located on the U.S. Geological Service 7.5-minute series topographic Imperial Beach quadrangle map. The site exists within an urban portion of the City and is bound on the south and east by industrial buildings, to the west by single-family residences, and to the north by multi-family condominiums (Figure 2, Aerial Image).

Project Description

The project proposes a rehabilitation center on the 9.79-acre project site and additional 0.22 acre of off-site improvements along Shinohara Lane. The project would be constructed in two phases (phase 1 and phase 2). Phase 1 of the project would include a 50-bed facility with supporting amenities. Phase 2 would include an addition to the building and would provide 30 additional beds. Ultimate buildout of the project would consist of an 80-bed facility (Figure 3, Site Plan). Site access would be provided via Shinohara Lane. All grading would be limited to the site, with the exception of utility connections to be made via Shinohara Lane to Brandywine Avenue.

Survey Methods

The vegetation communities and land covers were mapped according to Holland (1986) and Oberbauer et al. (2008). An aerial photograph map (Google Earth 2018) with a digital overlay of the project boundary was utilized to record

vegetation and any sensitive biological resources directly in the field. All plant species and animal species encountered during the survey were identified and recorded directly into a field notebook. In addition to species actually detected during the surveys, expected wildlife use of the site was evaluated by known habitat preferences of local species and knowledge of their relative distributions in the area. Compiled lists of the plant and animal species detected on site during the surveys are attached to this letter report as Attachment A and Attachment B, respectively.

The burrowing owl (*Athene cunicularia*) habitat assessment was conducted on January 18, 2018, and followed the protocol in the Staff Report for Burrowing Owl Mitigation (CDFG 2012), with the exception of the survey buffer. A 150-meter buffer was not surveyed due to the existing residential and commercial development. A total of approximately 2.5 hours were spent on site from 8:00 a.m. to 10:30 a.m. and temperatures ranged from 57 °F to 61 °F; conditions were clear with little to no wind (0 to 3 mph). The entire site was surveyed on foot by conducting a series of east–west transects to provide 100% cover and look for burrowing owls, their sign, or presence of suitable burrows (>11 centimeters in diameter and >150 centimeters in depth). Transects were walked at a pace that allowed careful observations along the transect route and immediate vicinity. Photographs were taken to record conditions of the site. Potential burrow locations were recorded using GPS, photographed, and documented. A second habitat assessment survey was also conducted on June 27, 2020, in order to provide an update to existing site conditions, as necessary.

A focused burrowing owl survey was conducted on January 25, 2018, following the survey guidelines in the Staff Report for Burrowing Owl Mitigation (CDFG 2012). The site was surveyed from 7:00 a.m. 9:30 a.m. and the temperature ranged from 53 °F to 55 °F with very light wind (1 to 5 mph). Cloud cover varied between 60% to 70% throughout entire survey. Line transects were walked on foot to ensure 100% visual coverage of the site; lines were spaced between 7 meters to 20 meters apart and adjusted for vegetation height and density. At the start of each transect line, the surrounding area was scanned using binoculars. Special attention was given to areas identified as having potential active burrows determined from the initial burrowing owl habitat assessment.

Survey Results

Existing conditions observed on site suggest that the property has been graded and disturbed. The southern portion of the site is mostly flat, while much of the northern portion is sloped and heavily eroded. There is a small cement drainage ditch that begins near the center of the site, and extends approximately 160 meters southeast to the project boundary. In addition, there are two other cement drainage ditches: one runs parallel to the eastern border and the other runs parallel to the southern border of the site.

Burrowing owl is known to occur in the area (Unitt 2004); California Natural Diversity Database records are primarily located near Otay Mesa approximately 3 miles east of the project site (CDFW 2018); however, no burrowing owls were observed during the initial site visit, update survey, or the focused burrowing owl survey on January 25, 2018.

Flora

The site supports a very limited amount of native vegetation, most of which is indicative of highly disturbed areas. The site does not provide good quality habitat for native plant species, and is dominated (i.e., 85%) by non-native perennial and weedy annual species. A total of 15 plants were identified on site (Attachment A). The most common non-native plants identified include Russian thistle (*Salsola tragus*), brome grass (*Bromus madritensis*), and oat grass (*Avena barbata*). The most common native plants include California buckwheat (*Eriogonum fasciculatum*)

and California sagebrush (*Artemisia californica*). According to the recognized San Diego County vegetation mapping systems (Holland 1986; Oberbauer et al. 2008) the site is classified as Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, developed/urban, and disturbed habitat (Figure 2). The acreages of the vegetation communities and land covers are listed in Table 1 according to their location on the project site or in the off-site improvement area. On-site and off-site vegetation and land cover types are also defined and described below.

Table 1. Vegetation Communities and Land Cover Present in the Project Study Area

Habitat Type	Existing Acres		
	On Site	Off Site	Total
Diegan coastal sage scrub	0.14	0	0.14
Eucalyptus woodland	0	0.02	0.02
Urban/Developed	0.45	0.04	0.49
Disturbed habitat	9.20	0.16	9.38
Total	9.79	0.22	10.01

Diegan Coastal Sage Scrub: Coastal Form (CSS) is a habitat type that consists of low-growing, woody shrubs that are most active in winter and early spring; they are drought-hardy and adapted to low moisture. This vegetation community typically occurs below 1,000 feet. These areas are dominated by California sagebrush and California buckwheat, both of which were identified on site.

Eucalyptus Woodland: According to Oberbauer et al. (2008), this “naturalized” vegetation community is fairly widespread in Southern California and is considered a woodland habitat. It typically consists of monotypic stands of introduced Australian eucalyptus trees. The understory is either depauperate or absent due to high leaf litter, which restricts growth in understory as a result of high levels of allelochemicals. Although eucalyptus woodlands are of limited value to most native plants and animals, they frequently provide nesting and perching sites for several raptor species.

Urban/Developed (DEV) is land that is currently developed or on which construction is currently underway. Whether the structures are permanent, semi-permanent, pavement, hardscape, or irrigated landscape, the land no longer has the ability to support native vegetation due to the extent of its physical modifications (Holland 1986; Oberbauer et al. 2008). Some ornamental landscapes, such as the row of non-native pine trees along the eastern perimeter of the site and in the off-site improvement areas along Shinohara Lane and alleyway, are identified as urban/developed land.

Disturbed Habitat (DH) is a land cover type that is characterized by a predominance of non-native species, often introduced and established through human action. Disturbed habitat has been physically disturbed, and is no longer recognizable as native or naturalized vegetation, while retaining a soil substrate (Holland 1986; Oberbauer et al. 2008). The site consists of two types of substrate: Olivenhain cobbly loam and Salinas clay loam (USDA 2018). The City’s Subarea Plan identifies disturbed habitat as disturbed lands and is considered Tier IV “other uplands” (City of Chula Vista 2003). These areas are dominated by prickly Russian thistle and slender oat in both the on and off-site areas. Tier IV uplands are not considered sensitive under the City’s Subarea Plan (City of Chula Vista 2003).

Fauna

Due to the predominance of non-native vegetation and site disturbance characteristics, the site has limited potential to provide habitat that support wildlife species. The project site is mostly surrounded by existing development and has no connectivity to habitat areas that would be considered “open space preserve lands” in the City’s Subarea Plan. Furthermore, given the residential surroundings, the site is unlikely to serve as a wildlife corridor. Several non-native trees exist along the perimeter of the project site; however, they are small, and it is unlikely that special-status birds (including raptors) would use the site for nesting. There are no prominent rocks, boulders, or features on site that could be used by special-status reptiles. The few wildlife species detected during the survey are listed in Attachment B of this letter report.

A total of 13 wildlife species were observed and identified during the survey. Commonly observed species include white-crowned sparrow (*Zonotrichia leucophrys*), Anna’s hummingbird (*Calypte anna*), mourning dove (*Zenaida macroura*), lesser goldfinch (*Spinus psaltria*), killdeer (*Charadrius vociferus*), and common side-blotched lizard (*Uta stansburiana*); one red-tailed hawk (*Buteo jamaicensis*) was seen soaring above the project site.

Although there is potential for burrowing owl to occur, no burrowing owl, occupied sites or burrows, or evidence of recent burrowing owl sign (pellets, scat, feathers, tracks, etc.) were observed on the property during the site visit. Two potential burrowing owl burrows were detected in the northern portion of the site, but were not considered suitable upon further survey evaluation. Potential California ground squirrel (*Spermophilus (Otospermophilus) beecheyi*) and other rodent burrows were also observed on portions of the site. The site supports marginal habitat for burrowing owls based on the results of the habitat assessment.

Jurisdictional Wetland Resources

No jurisdictional wetland resources were found. There are several concrete drainage channels within the interior and along the perimeter of the site used for on-site drainage.

Regulatory Context

The municipalities of southwestern San Diego County collaborated in producing the MSCP Subregional Plan (County of San Diego 1998). The MSCP Subregional Plan is implemented through individual Subarea Plans adopted by each jurisdiction in order to receive “take authorization” for impacts to covered species and habitats. The MSCP serves as a Habitat Conservation Plan pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act of 1973, as well as a Natural Communities Conservation Plan under the Natural Community Conservation Planning Act of 2001. The MSCP, as implemented through the Subarea Plans, allows the participating jurisdictions to authorize take of plant and wildlife species identified within the plan area. The U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) have authority to regulate the take of threatened, endangered, and rare species. Under the MSCP, the USFWS and CDFW have granted take authorization to the local jurisdictions, including the City, for otherwise lawful actions, such as public and private development, that may incidentally take or harm individual species or their habitat outside of the designated Preserve areas, in exchange for the assembly and management of a coordinated MSCP Preserve. The City of Chula Vista is a participant in the San Diego MSCP through the Chula Vista Subarea Plan.

The MSCP is implemented in Chula Vista through the City's approved MSCP Subarea Plan (City of Chula Vista 2003). Within the City's Subarea Plan, the project site is designated as "Development Area Outside of Covered Projects" (i.e., not designated a preserve or conservation area) (Figure 5, Regional Context). As defined by the Subarea Plan, projects within the Development Area outside of Covered Projects planning area shall adhere to the City's Habitat Loss and Incidental Take (HLIT) Ordinance. Consistency with regional resource planning is discussed further below.

Habitat Loss Incidental Take Ordinance

For projects within Development Areas Outside of Covered Projects that contain sensitive biological resources and for which the project site is greater than 1 acre, the HLIT Ordinance requires a biological evaluation of the resources on site. In compliance with the MSCP Subregional Plan and the Subarea Plan, the City established development standards in the HLIT Ordinance, as a condition of issuance of take authorization by the USFWS and CDFW. The HLIT is consistent with the conservation and mitigation goals of the 1998 MSCP Subregional Plan and the City's Subarea Plan. Furthermore, the HLIT provides standards for development, identifies specific impact thresholds, and defines the mitigation requirements for impacts to native and some non-native communities (e.g., non-native grassland). Impacts to Tier I, II, and III habitats will be mitigated pursuant to HLIT mitigation standards provided in Table 5-3 of the Subarea Plan. Based on the current site conditions, there is 0.06 acre of coastal sage scrub that could be impacted by the project, which would require mitigation at a 1:1 or 1.5:1 mitigation ratio, depending on where the mitigation site is located.

The HLIT provides protection of Narrow Endemic Species and wetland impact avoidance/minimization; however, due to the continued disturbance to the site over the years, no Narrow Endemic Species are expected to occur on site, and there are no potential wetlands on site.

Project Impacts

This section addresses direct impacts and indirect impacts that will result from implementation of the proposed project.

Direct Impacts may include both the permanent loss of on-site habitat and the plant and wildlife species that it contains and the temporary loss of on-site habitat. Direct impacts were quantified by overlaying the proposed impact alignment onto the biological resources map and evaluating the impacts by vegetation community.

Indirect Impacts refer to off-site and on-site effects that are short-term impacts (i.e., temporary) due to the project construction or long-term (i.e., permanent) design of the project and the effects it may have to adjacent resources. For this project, it is assumed that the potential indirect impacts resulting from construction activities may include dust, noise, general human presence that may temporarily disrupt species and habitat vitality, and construction-related soil erosion and runoff. No long-term indirect impacts are assumed to occur as the project site is surrounded by urban development such that implementation of the project would not have a long-term effect on adjacent wildlife or suitable habitat. Therefore, long term indirect impacts would be considered less than significant.

Direct Impacts

Vegetation Communities and Land Cover Types

Implementation of both phases of the project (phase 1 and phase 2) will result in direct impacts to two vegetation communities and two land covers, which include coastal sage scrub, disturbed coastal sage scrub, disturbed habitat, and urban/developed land (Figure 2). Table 2 provides a summary of these impacts, by phase.

Table 2. Direct Impacts from the Proposed Project

Vegetation Community/Land Cover Type	Impact (acres)				Habitat Mitigation Ratios ¹
	Phase 1 On Site (acres)	Phase 1 Off Site (acres)	Phase 2 On Site (acres)	Total	
Vegetation Communities					
Coastal Sage Scrub	0.05	0	0.01	0.06	1:1 to 1.5:1
Eucalyptus Woodland	0	0.02	0	0.02	N/A
Non-native Vegetation and Land Covers					
Disturbed Habitat	7.49	0.16	0.39	8.04	N/A
Urban/Developed	0.06	0.04	0	0.11	N/A
Total	7.61	0.22	0.40	8.22	N/A

* Numbers may not total precisely due to rounding.

¹ The mitigation ratios range is based on the location of the mitigation (inside versus outside the preserve).

Urban/developed lands and disturbed habitat provide little native habitat value and foraging opportunities for wildlife and impacts to these vegetation communities/land covers would not be considered significant and no mitigation is required, in accordance with the requirements in the HLIT ordinance.

Direct impacts to coastal sage scrub would be 0.05 acre for phase 1 and an additional 0.01 acre for phase 2, would be considered significant and mitigation would be required, according to the requirements and ratios in the HLIT ordinance (**MM-BIO-1**) (Table 2).

Waters of the U.S., including Wetlands

No jurisdictional resources were identified within the project impact area, therefore no direct impacts to waters of the U.S., including wetlands, would occur.

Special-Status Plants

No special-status plants were detected in the project study area during the 2018 or 2020 site surveys. There are no special-status plant species with a moderate or high potential to occur within the project study area and, due to the extent of vegetative disturbance and lack of suitable substrate, special-status plant species are not expected to occur (Attachment C, Special-Status Plant Species Potentially Occurring within the Project Study Area). Therefore, no significant direct impacts to special-status plants are anticipated.

Special-Status Wildlife

No special-status wildlife species were detected during the 2018 or 2020 site surveys, including the focused survey for burrowing owl, and potentials are low for special-status species to occur in the study area due to the disturbed nature of the site (past grading, presence of invasive species, etc.) and the location being surrounded by urban development. Based on this information, significant direct impacts to these and other special-status wildlife species, with the exception of burrowing owl, are not expected to occur (Attachment D, Special-Status Wildlife Species Potentially Occurring within the Project Study Area). Due to the known presence of burrowing owl in the surrounding area and the open and disturbed nature of the site (Figure 4), there is a potential for the species to occur on the site, and pre-construction surveys will be conducted to ensure no impacts to burrowing owls occur (**MM-BIO-3**).

All raptors species are considered special-status and may use the site for foraging. Stands of small ornamental trees are present within the project study area and a red-tailed hawk (*Buteo jamaicensis*) was seen soaring over the site; however, no nests were observed. Although raptor species have the potential to occur in the study area, lands within the impact footprint are primarily disturbed and do not provide suitable nesting habitat that would substantially affect any species from continuing to exist within the area.

Indirect Impacts

Vegetation Communities and Land Covers

Two native vegetation communities were mapped within the project impact footprint—coastal sage scrub and disturbed coastal sage scrub. Short-term indirect impacts that may affect adjacent vegetation communities include dust, invasive plant species, and increased human presence. Typical construction BMPs will limit the spread of dust, and the project landscape plan would not include invasive species. Increased human presence is a potential short-term indirect impact. During construction, typical BMPs, such as having trash containers on site, a demarcated limit of work, and contractor education, will limit the potential for trash and other human disturbance. The project would incorporate methods to control runoff, including a Stormwater Pollution Prevention Plan (SWPPP) to meet National Pollution Discharge Elimination System (NPDES) regulations. Therefore, short-term indirect impacts to off site, adjacent vegetation communities are not considered significant.

The only potential long-term indirect impact is the change in stormwater discharge hydrology downstream of the project. It is assumed that the project will be designed in accordance with NPDES regulations and as such, the project is not expected to result in any long-term indirect adverse impacts.

Waters of the U.S., including Wetlands

No jurisdictional resources were identified within the project impact area, therefore no indirect impacts to waters of the U.S., including wetlands, would occur.

Special-Status Plant Species

Following completion of field surveys in 2018 and 2020, no special-status plant species with moderate to high potential to occur adjacent to the study area, and therefore, indirect impacts to off-site special-status plant species are not expected to occur.

Special-Status Wildlife Species

Most of the indirect impacts to vegetation communities previously described can also affect special-status wildlife. Wildlife may also be indirectly affected in the short-term by construction-related noise, which can disrupt normal activities and subject wildlife to higher predation risks. Adverse edge effects can cause degradation of habitat quality through the invasion of pest species. Breeding birds can be significantly affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities.

The project study area supports suitable vegetation for bird nesting, including trees associated with the street and property landscaping, and coastal sage scrub vegetation mapped on site. This is nesting habitat for raptors and songbirds protected by California Fish and Game Code Sections 3503 and 3503.5. Indirect impacts from construction-related noise may occur to breeding wildlife if construction occurs during the breeding season (i.e., February 1 through September 15). Wildlife that would be significantly affected by noise, based on suitable habitat in the project vicinity. Species whose breeding/nesting may be significantly impacted by noise include all raptor species. This impact would be considered a significant impact, absent mitigation (**MM-BIO-2**).

Mitigation

MM-BIO-1: Compensatory Uplands Mitigation: Prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits, the project applicant shall mitigate direct impacts to 0.06 acre of coastal sage scrub habitat pursuant to the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (Subarea Plan) and Habitat Loss Incidental Take (HLIT) Ordinance. Per the HLIT ordinance, impacts to coastal sage scrub shall be mitigated at the ratios identified in the MSCP Subarea Plan Table 5-3. Considering the project site is located outside of the preserve, coastal sage scrub mitigation provided in the Preserve shall be at a 1:1 ratio and coastal sage scrub mitigation provided outside of the Preserve shall be at a 1:1.5 ratio. Mitigation shall be provided through one or a combination of the following options:

Mitigation Bank. The applicant shall secure mitigation credits within a City-approved Conservation Bank or other City-approved location offering mitigation credits. Mitigation credits shall be for habitat of equivalent or higher habitat value than coastal sage scrub, with value determined consistent with the Subarea Plan tier system (see Subarea Plan Table 5-3). The San Diego County Water Authority's San Miguel Conservation Bank, located in Chula Vista, is a conservation bank with ample coastal sage scrub acre-credits that could be utilized upon City approval. The applicant is required to provide the City with verification of mitigation credit purchase prior to issuance of any grading permit, including clearing, grubbing, grading and construction permits.

On-site Habitat Restoration. The project applicant shall provide 0.09 acre of on-site restoration of coastal sage scrub habitat and preservation of the restored habitat in perpetuity. Restoration will occur in an area of disturbed habitat adjacent to the impacted coastal sage scrub on the site. Given the limited size of the impacts to coastal sage scrub from the project and the urban setting of the site, restoration of disturbed habitat will be sufficient to ensure no net loss of coastal sage scrub habitat on the site. The restoration shall achieve 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The on-site habitat restoration mitigation site shall be preserved through (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) the designation of a permanent responsible party, and (3) be managed in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan can be a memorandum or letter report, but at minimum shall include the following: an implementation plan (possessing a plant palette with appropriate coastal sage scrub plant species), established performance criteria outlining native/non-native cover goals, container plant survival rate goals, maintenance and monitoring (to be performed by a qualified restoration technician), and additional measures as needed to meet the performance criteria of maintaining 60 percent native plant cover. Prior to grading permit issuance, the project applicant shall provide proof that funds required to implement the restoration according to the Habitat Management Plan have been provided to the permanent responsible party.

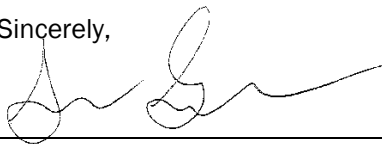
On-site Habitat Preservation and Restoration. The project applicant shall provide on-site preservation of the remaining coastal sage scrub habitat not impacted by the project in addition to an adjoining area of restored habitat as described in the previous mitigation option; the combination of these areas would need to be 0.09 acre or more. Currently, the coastal sage scrub on the site possesses less than 60% of native coastal sage scrub species. This measure would ensure the enhancement of the both the preserved and restored areas with the goal of achieving 60 percent cover by native plants characteristic of coastal sage scrub habitat within 2 years, as verified by a qualified biologist or restoration technician.

The combination of on-site habitat preservation and restoration shall be ensured through: (1) the provision of a conservation easement or other City-approved mechanism over the habitat that provides preservation in perpetuity, (2) a permanent responsible party clearly designated, and (3) management in accordance with a Habitat Management Plan in perpetuity. The Habitat Management Plan shall be the same as is described in the previous mitigation option and will be intended to maintain 60 percent cover by native plants characteristic of coastal sage scrub habitat within the restored and preserved area. Prior to grading permit issuance, the project applicant shall provide proof that such funds have been provided to the permanent responsible party.

MM-BIO-2: Avoidance of Nesting Bird Impacts: To avoid any direct and indirect impacts any species identified as a candidate, sensitive, or special status species in the HLIT, MSCP Subregional Plan, or other local or regional plans, policies or regulations, or by the CDFW or USFWS, removal of habitat that supports active nests in the proposed project study area should occur outside of the breeding season of these species (February 1 to September 15), where feasible. If removal of habitat must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted no more than 72 hours prior to the start of construction activities (including removal of vegetation). If nesting birds are detected, a letter report or mitigation plan in conformance with the HLIT and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, and construction barriers/buffers) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City.

MM-BIO-3 Prior to issuance of any land development permits (including clearing, grubbing, and grading permits), the project applicant shall retain a City-approved biologist to conduct focused pre-construction surveys for burrowing owls. The surveys shall be performed no earlier than 30 days prior to the commencement of any clearing, grubbing, or grading activities. If burrowing owls are observed, the City-approved biologist shall work with the City to determine if the owls are migratory or if the owls are occupying burrows. If occupied burrows are detected, the City-approved biologist shall prepare a passive relocation mitigation plan subject to the review and approval by the Wildlife Agencies and City, including any subsequent burrowing owl relocation plans to avoid impacts from construction-related activities. The plan shall be prepared according to the performance measures set forth in the Staff Report on Burrowing Owl Mitigation prepared by the State of California Natural Resource Agency Department of Fish and Game dated March 7, 2012.

Sincerely,



Scott Gressard, MS
Biologist

Att.: *Figures*

- A - List of Vascular Plant Species Observed within the Project Study Area*
- B - List of Wildlife Species Observed within the Project Study Area*
- C - Special-Status Plant Species Potentially Occurring within the Project Study Area*
- D - Special-Status Wildlife Species Potentially Occurring within the Project Study Area*
- E - HLIT Findings*

References

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Mr. John R. Tschudin, Jr.

Subject: *Biology Letter Report for Encompass Health Chula Vista, City of Chula Vista, California*

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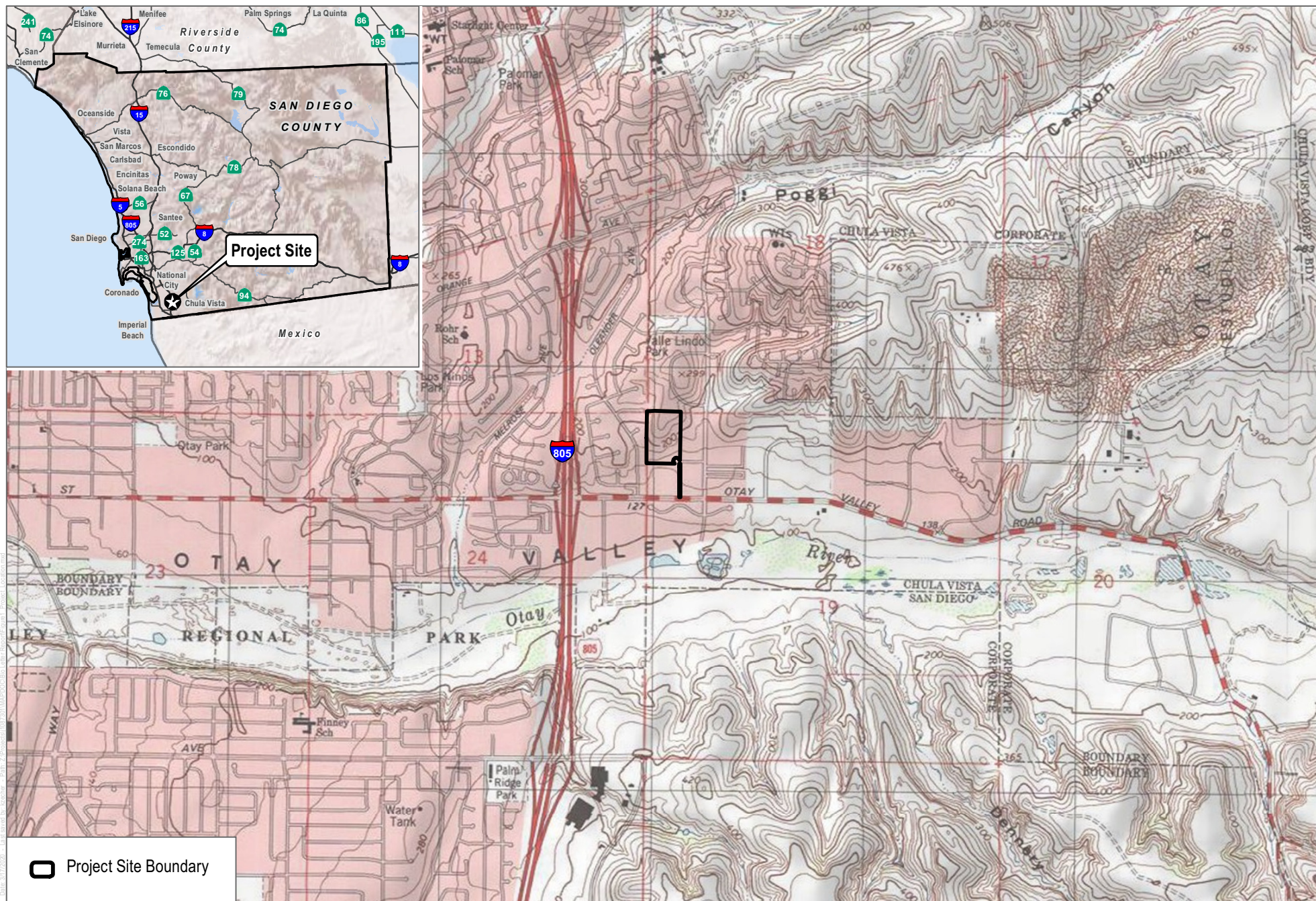


FIGURE 1

Project Location

Encompass Health Chula Vista

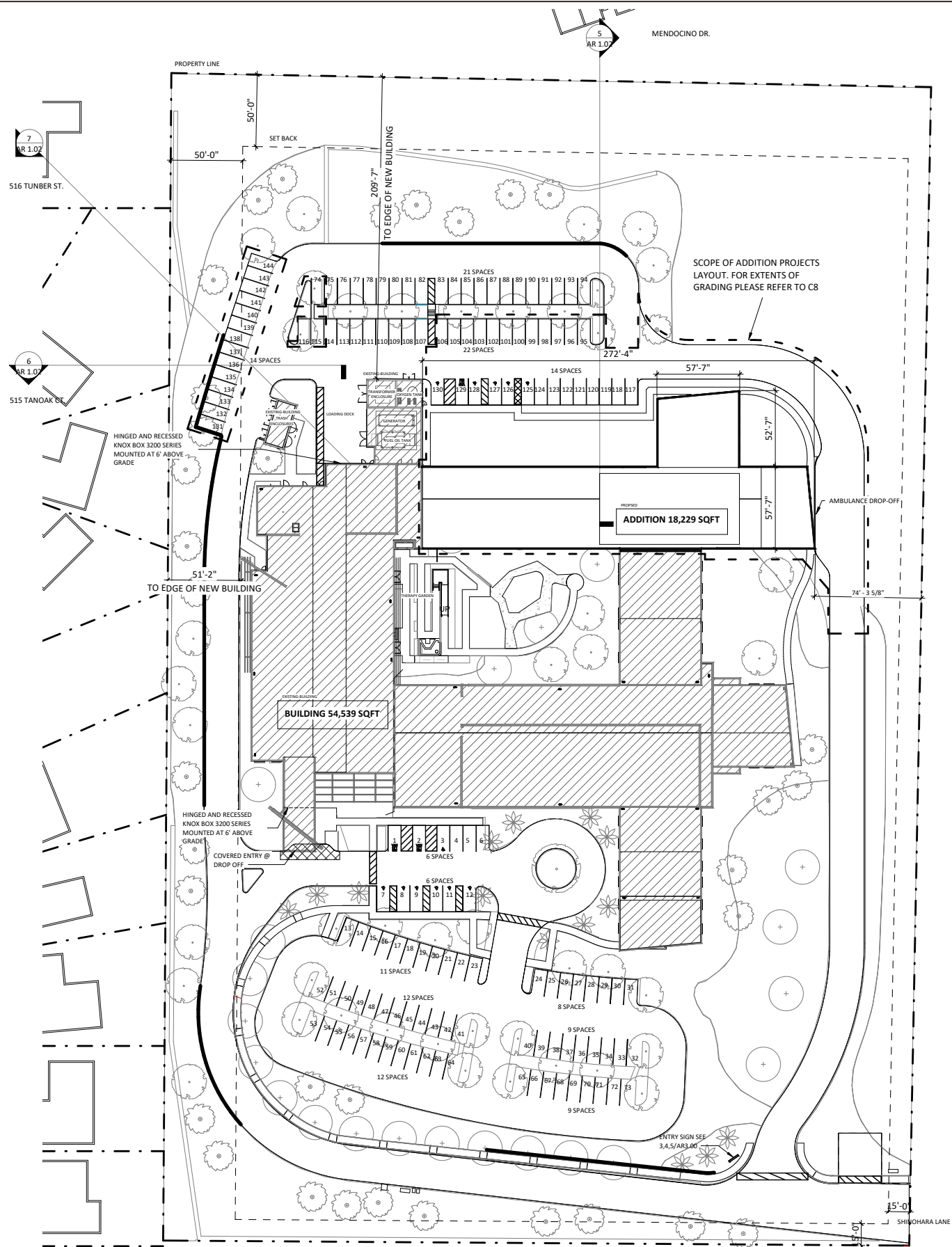


SOURCE: SANDAG Aerial Imagery Basemap, 2014

FIGURE 2

Aerial Image

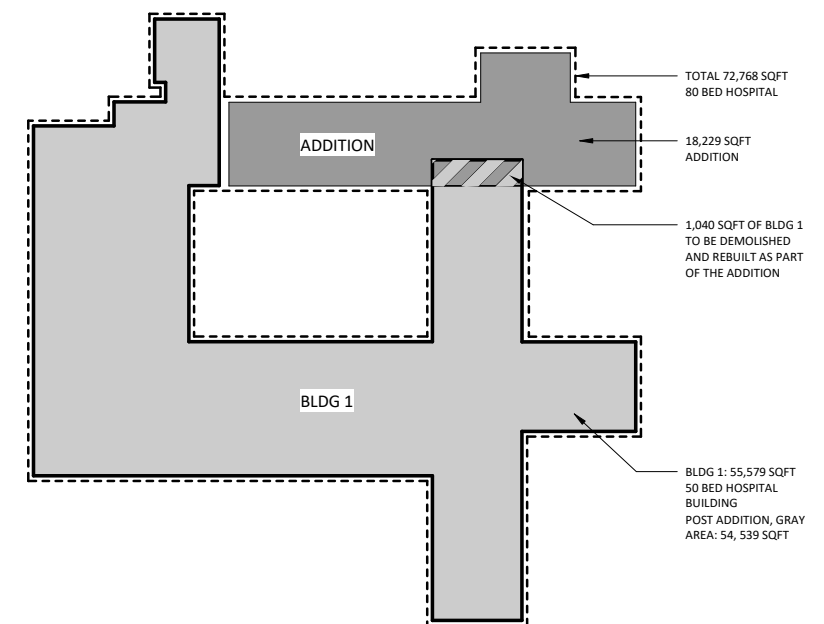
Encompass Health Chula Vista



ADDITION PARKING COUNTS

NORTH LOT		SOUTH LOT	
ACC. CAR	5	ACC. CAR	7
ACC. VAN	1	ACC. VAN	2
REGULAR	65	REGULAR	64
TOTAL	71	TOTAL	73
TOTAL SITE PARKING		144	

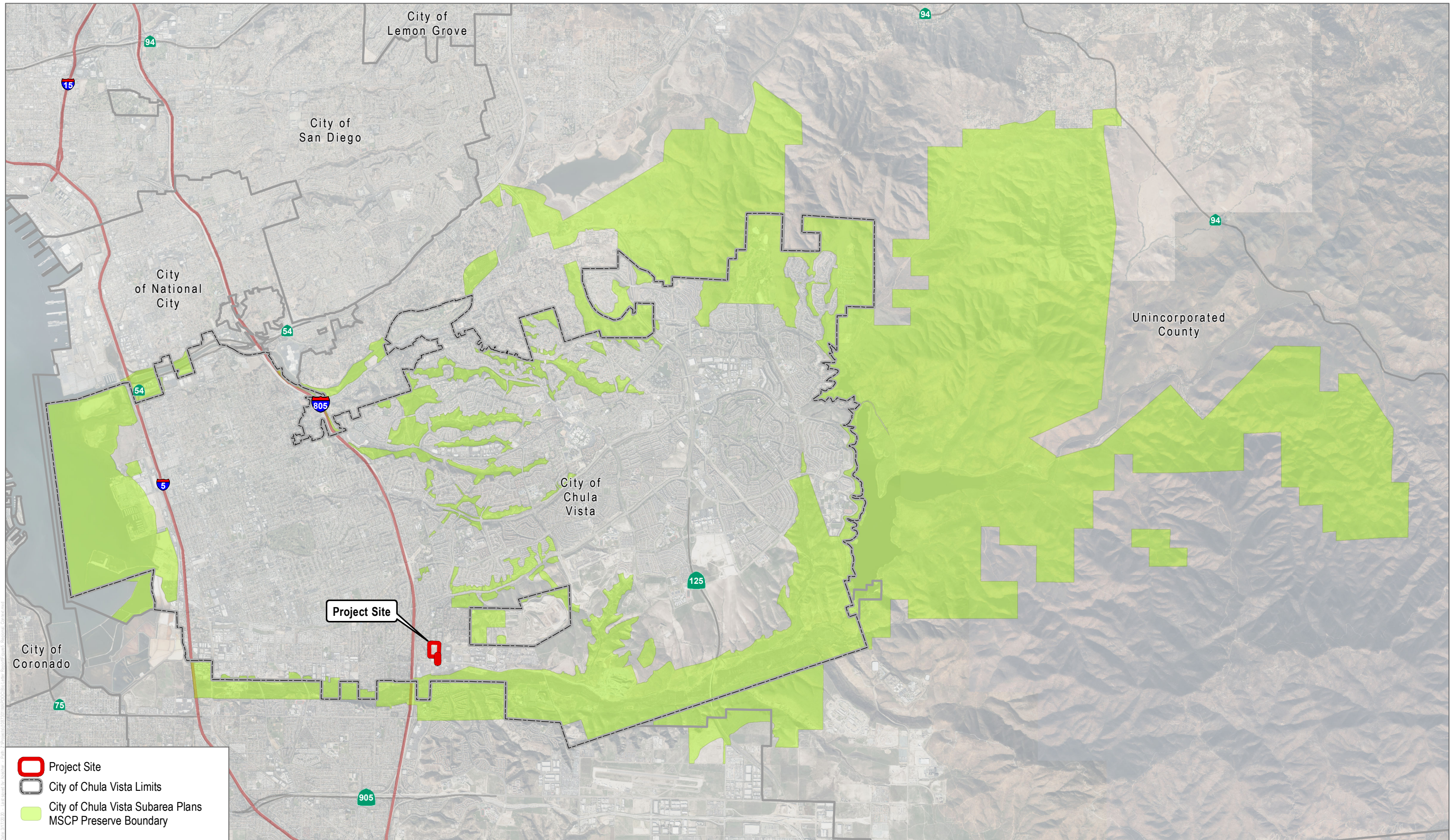
HOSPITAL AND ADDITION DIAGRAM



SOURCE: Boulder Associates 2020



SOURCE: SANDAG Aerial Imagery Basemap, 2014



SOURCE: City of Chula Vista 2017, SANDAG Aerial Imagery Basemap, 2014



Attachment A

List of Vascular Plant Species Observed within the
Project Study Area

VASCULAR SPECIES

MONOCOTS

POACEAE – GRASS FAMILY

- * *Avena barbataslender* – oat
- * *Bromus madritensis* – compact brome

EUDICOTS

AIZOACEAE – FIG-MARIGOLD FAMILY

- * *Carpobrotus edulis* – ice plant

ANACARDIACEAE – SUMAC OR CASHEW FAMILY

Rhus integrifolia – lemonade berry

ASTERACEAE – SUNFLOWER FAMILY

Baccharis sarothroides – desertbroom
Encelia californica – California brittle bush
Artemisia californica – California sagebrush
Baccharis pilularis – coyote brush

CACTACEAE – CACTUS FAMILY

Cylindropuntia prolifera – coastal cholla
Opuntia littoralis – coast prickly pear

CHENOPODIACEAE – GOOSEFOOT FAMILY

- * *Salsola tragus* – prickly Russian thistle

CRASSULACEAE – STONECROP FAMILY

- * *Crassula ovata* – jade plant

FABACEAE – LEGUME FAMILY

Acmispon glaber – deer weed

PLATANACEAE – PLANE TREE, SYCAMORE FAMILY

Platanus sp. – Sycamore sp.

POLYGONACEAE – BUCKWHEAT FAMILY

Eriogonum fasciculatum – California buckwheat

ROSACEAE – ROSE FAMILY

Heteromeles arbutifolia – toyon

SIMMONDSIACEAE – JOJOBA FAMILY

Simmondsia chinensis – jojoba

* signifies introduced (non-native) species



Attachment B

List of Wildlife Species Observed within the
Project Study Area

BIRD

FINCHES

FRINGILLIDAE – FRINGILLINE, CARDUELINE FINCHES AND ALLIES

Spinus psaltria – lesser goldfinch

FLYCATCHERS

TYRANNIDAE – TYRANT FLYCATCHERS

Sayornis nigricans – black phoebe

Sayornis saya – Say's phoebe

Tyrannus vociferans – Cassin's kingbird

HAWKS

ACCIPITRIDAE – HAWKS, KITES, EAGLES, AND ALLIES

Buteo jamaicensis – red-tailed hawk

HUMMINGBIRDS

TROCHILIDAE – HUMMINGBIRDS

Calypte anna – Anna's hummingbird

JAYS, MAGPIES and CROWS

CORVIDAE – CROWS AND JAYS

Corvus brachyrhynchos – American crow

MOCKINGBIRDS and THRASHERS

MIMIDAE – MOCKINGBIRDS AND THRASHERS

Mimus polyglottos – northern mockingbird

PIGEONS and DOVES

COLUMBIDAE – PIGEONS AND DOVES

Zenaida macroura – mourning dove

SHOREBIRDS

CHARADRIIDAE – LAPWINGS AND PLOVERS

Charadrius vociferus – killdeer

NEW WORLD SPARROWS

PASSERELLIDAE – NEW WORLD SPARROWS

Melospiza crissalis – California towhee

Zonotrichia leucophrys – white-crowned sparrow

REPTILE

LIZARDS

PHRYNOSOMATIDAE – IGUANID LIZARDS

Uta stansburiana – common side-blotched lizard



Attachment C

Special-Status Plant Species Potentially Occurring within the
Project Study Area

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Abronia maritima</i>	red sand-verbena	None/None/4.2/None	Coastal dunes/perennial herb/Feb–Nov/0–330	Not expected to occur. No suitable vegetation present.
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	FT/SE/1B.1/Narrow Endemic	Chaparral, Coastal scrub, Valley and foothill grassland, Vernal pools; Clay, openings/annual herb/Apr–June/30–3150	Not expected to occur. This species is associated with heavy clay soils (USFWS 2009a).
<i>Acmispon prostratus</i>	Nuttall's acmispon	None/None/1B.1/Covered	Coastal dunes, Coastal scrub (sandy)/annual herb/Mar–June(July)/0–35	Not expected to occur. The site is outside of the species' known elevation range.
<i>Adolphia californica</i>	California adolphia	None/None/2B.1/None	Chaparral, Coastal scrub, Valley and foothill grassland; Clay/perennial deciduous shrub/Dec–May/30–2430	Low potential to occur. There is coastal scrub present, however the site does not support clay soil suitable for this species.
<i>Agave shawii</i> var. <i>shawii</i>	Shaw's agave	None/None/2B.1/Covered, Narrow Endemic	Coastal bluff scrub, Coastal scrub; Maritime succulent scrub/perennial leaf succulent/Sep–May/5–395	Low potential to occur. There is no suitable coastal bluff scrub present. Also, as stated by Reiser (2001), this species is almost extirpated in the U.S., and occurs in few documented areas.
<i>Ambrosia chenopodiifolia</i>	San Diego bur-sage	None/None/2B.1/None	Coastal scrub/perennial shrub/Apr–June/180–510	Low potential to occur. There is suitable coastal scrub present, however this perennial shrub would have been observed if present.
<i>Ambrosia monogyra</i>	singlewhorl burrobrush	None/None/2B.2/None	Chaparral, Sonoran desert scrub; sandy/perennial shrub/Aug–Nov/30–1640	Not expected to occur. No suitable vegetation present.
<i>Ambrosia pumila</i>	San Diego ambrosia	FE/None/1B.1/Covered, Narrow Endemic	Chaparral, Coastal scrub, Valley and foothill grassland, Vernal pools; sandy loam or clay, often in disturbed areas, sometimes alkaline/perennial rhizomatous herb/Apr–Oct/65–1360	Low potential to occur. This species prefers creek beds, floodplains, and seasonally dry areas (Reiser 2001). In addition, there is no suitable clay soil present.
<i>Aphanisma blitoides</i>	aphanisma	None/None/1B.2/Covered	Coastal bluff scrub, Coastal dunes, Coastal scrub; sandy or gravelly/annual herb/Feb–June/0–1000	Low potential to occur. This species prefers coastal bluff and coastal dune habitat (Reiser 2001).
<i>Arctostaphylos otayensis</i>	Otay manzanita	None/None/1B.2/Covered	Chaparral, Cismontane woodland; metavolcanic/perennial evergreen shrub/Jan–Apr/900–5575	Not expected to occur. The site is outside of the species' known elevation range but can be found at lower elevations. There is no suitable vegetation present and this species is not known to occur within the vicinity (CDFW 2019).

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Artemisia palmeri</i>	San Diego sagewort	None/None/4.2/None	Chaparral, Coastal scrub, Riparian forest, Riparian scrub, Riparian woodland; sandy, mesic/perennial deciduous shrub/(Feb)May-Sep/45–3000	Low potential to occur. There is coastal scrub present, however there is no riparian habitat and this perennial shrub would have been observed if present.
<i>Asplenium vespertinum</i>	western spleenwort	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub; rocky/perennial rhizomatous herb/Feb–June/590–3280	Not expected to occur. The site is outside of the species' known elevation range. This species is not known to occur within the vicinity (CDFW 2019).
<i>Astragalus deanei</i>	Dean's milk-vetch	None/None/1B.1/Covered	Chaparral, Cismontane woodland, Coastal scrub, Riparian forest/perennial herb/Feb–May/245–2280	Low potential to occur. There is suitable coastal scrub present but the species is generally found in eastern San Diego County. This species is not known to occur within the vicinity (CDFW 2019).
<i>Astragalus tener</i> var. <i>titi</i>	coastal dunes milk-vetch	FE/SE/1B.1/Covered	Coastal bluff scrub (sandy), Coastal dunes, Coastal prairie (mesic); often vernal mesic areas/annual herb/Mar–May/0–165	Not expected to occur. No suitable vegetation present. This species is primarily associated with coastal dune habitat (Reiser 2001). There is only one known occurrence documented within San Diego County (SDNHM 2012), and the species is likely extirpated in San Diego County (Reiser 2001). This species is not known to occur within the vicinity (CDFW 2019).
<i>Atriplex coulteri</i>	Coulter's saltbush	None/None/1B.2/None	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland; alkaline or clay/perennial herb/Mar–Oct/5–1510	Low potential to occur. This species prefers sea bluff habitat (Reiser 2001) and inland habitat.
<i>Atriplex pacifica</i>	South Coast saltscale	None/None/1B.2/None	Coastal bluff scrub, Coastal dunes, Coastal scrub, Playas/annual herb/Mar–Oct/0–460	Low potential to occur. There is coastal scrub present, however there are no coastal dunes, coastal bluff scrub, or playas on site.
<i>Bergerocactus emoryi</i>	golden-spined cereus	None/None/2B.2/None	Closed-cone coniferous forest, Chaparral, Coastal scrub; sandy/perennial stem succulent/May–June/5–1295	Low potential to occur. While potential suitable habitat is present and this species occurs within the coastal region of south San Diego County, according to Reiser (2001), the primary habitat where this species occurs is maritime succulent scrub, which does not occur within the project site.

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Bloomeria clevelandii</i>	San Diego goldenstar	None/None/1B.1/Covered	Chaparral, Coastal scrub, Valley and foothill grassland, Vernal pools; clay/perennial bulbiferous herb/Apr–May/160–1525	Low potential to occur. There is coastal scrub present, however there are no vernal pools or suitable clay soils.
<i>Brodiaea orcuttii</i>	Orcutt's brodiaea	None/None/1B.1/Covered	Closed-cone coniferous forest, Chaparral, Cismontane woodland, Meadows and seeps, Valley and foothill grassland, Vernal pools; mesic, clay/perennial bulbiferous herb/May–July/95–5550	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Calandrinia breweri</i>	Brewer's calandrinia	None/None/4.2/None	Chaparral, Coastal scrub; sandy or loamy, disturbed sites and burns/annual herb/(Jan)Mar–June/30–4005	Low potential to occur. There is suitable coastal scrub and loamy soils, however this species is not known to occur within the vicinity (CDFW 2019).
<i>Calochortus dunnii</i>	Dunn's mariposa lily	None/SR/1B.2/Covered, Narrow Endemic	Closed-cone coniferous forest, Chaparral, Valley and foothill grassland; gabbroic or metavolcanic, rocky/perennial bulbiferous herb/(Feb)Apr–June/605–6005	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Camissoniopsis lewisii</i>	Lewis' evening-primrose	None/None/3/None	Coastal bluff scrub, Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland; sandy or clay/annual herb/Mar–May(June)/0–985	Low potential to occur. There is coastal scrub present, however there are no coastal dunes, coastal bluff scrub, or sandy soils present.
<i>Ceanothus cyaneus</i>	Lakeside ceanothus	None/None/1B.2/Covered, Narrow Endemic	Closed-cone coniferous forest, Chaparral/perennial evergreen shrub/Apr–June/770–2475	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Ceanothus otayensis</i>	Otay Mountain ceanothus	None/None/1B.2/None	Chaparral (metavolcanic or gabbroic)/perennial evergreen shrub/Jan–Apr/1965–3610	Not expected to occur. The site is outside of the species' known elevation range but can occur at lower elevation. However, there is no suitable vegetation present and this species is not known to occur within the vicinity (CDFW 2019).
<i>Ceanothus verrucosus</i>	wart-stemmed ceanothus	None/None/2B.2/Covered	Chaparral/perennial evergreen shrub/Dec–May/0–1245	Not expected to occur. No suitable vegetation present.

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>	Orcutt's pincushion	None/None/1B.1/None	Coastal bluff scrub (sandy), Coastal dunes/annual herb/Jan–Aug/0–330	Not expected to occur. No suitable vegetation present.
<i>Chamaebatia australis</i>	southern mountain misery	None/None/4.2/None	Chaparral (gabbroic or metavolcanic)/perennial evergreen shrub/Nov–May/980–3345	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	FE/SE/1B.2/Covered	Coastal dunes, Marshes and swamps (coastal salt)/annual herb (hemiparasitic)/May–Oct(Nov)/0–100	Not expected to occur. No suitable vegetation present. This species is known to occur on marshes.
<i>Chorizanthe orcuttiana</i>	Orcutt's spineflower	FE/SE/1B.1/None	Closed-cone coniferous forest, Chaparral (maritime), Coastal scrub; sandy openings/annual herb/Mar–May/5–410	Low potential to occur. This species is primarily associated with coastal chamise chaparral habitat (Reiser 2001). However, there are no undisturbed sandy soils on site (Reiser 2001) and this species is not known to occur within the vicinity (CDFW 2019).
<i>Chorizanthe polygonoides</i> var. <i>longispina</i>	long-spined spineflower	None/None/1B.2/None	Chaparral, Coastal scrub, Meadows and seeps, Valley and foothill grassland, Vernal pools; often clay/annual herb/Apr–July/95–5020	Not expected to occur. There is no suitable clay soil or vernal pools present.
<i>Cistanthe maritima</i>	seaside cistanthe	None/None/4.2/None	Coastal bluff scrub, Coastal scrub, Valley and foothill grassland; sandy/annual herb/(Feb)Mar–June(Aug)/15–985	Low potential to occur. There is coastal scrub present, however there is no coastal bluff scrub or sandy soil on site.
<i>Clarkia delicata</i>	delicate clarkia	None/None/1B.2/None	Chaparral, Cismontane woodland; often gabbroic/annual herb/Apr–June/770–3280	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Clinopodium chandleri</i>	San Miguel savory	None/None/1B.2/Covered	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland, Valley and foothill grassland; Rocky, gabbroic or metavolcanic/perennial shrub/Mar–July/390–3525	Not expected to occur. The site is outside of the species' known elevation range. This species is not known to occur within the vicinity (CDFW 2019).

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>	summer holly	None/None/1B. 2/None	Chaparral, Cismontane woodland/perennial evergreen shrub/Apr–June/95–2590	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Convolvulus simulans</i>	small-flowered morning-glory	None/None/4.2/None	Chaparral (openings), Coastal scrub, Valley and foothill grassland; clay, serpentinite seeps/annual herb/Mar–July/95–2430	Low potential to occur. There is coastal scrub present, however there is no chaparral and suitable clay soil present.
<i>Corethrogyne filaginifolia</i> var. <i>incana</i>	San Diego sand aster	None/None/1B. 1/None	Coastal bluff scrub, Chaparral, Coastal scrub/perennial herb/June–Sep/5–375	Low potential to occur. This species is primarily associated with coastal chamise chaparral habitat (Reiser 2001). However, there are no undisturbed sandy soils on site (Reiser 2001).
<i>Cylindropuntia californica</i> var. <i>californica</i>	snake cholla	None/None/1B. 1/Covered, Narrow Endemic	Chaparral, Coastal scrub/perennial stem succulent/Apr–May/95–490	Low potential to occur. Suitable coastal scrub is present; however, this species is primarily associated with xeric hillsides (Reiser 2001).
<i>Deinandra conjugens</i>	Otay tarplant	FT/SE/1B.1/Covered, Narrow Endemic	Coastal scrub, Valley and foothill grassland; clay/annual herb/(Apr)May–June/80–985	Low potential to occur. This species is associated with clay soils or clay subsoils (USFWS 2009b).
<i>Deinandra floribunda</i>	Tecate tarplant	None/None/1B. 2/None	Chaparral, Coastal scrub/annual herb/Aug–Oct/225–4005	Low potential to occur. There is coastal scrub present, however, there is no chaparral and this species is not known to occur within the vicinity (CDFW 2019).
<i>Deinandra paniculata</i>	paniculate tarplant	None/None/4.2/None	Coastal scrub, Valley and foothill grassland, Vernal pools; usually vernal mesic, sometimes sandy/annual herb/(Mar)Apr–Nov(Dec)/80–3085	Low potential to occur. Paniculate tarplant occurs in northern San Diego county near Camp Pendleton and is a grassland species.
<i>Dichondra occidentalis</i>	western dichondra	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland/perennial rhizomatous herb/(Jan)Mar–July/160–1640	Low potential to occur. There is coastal scrub present, however there is no chaparral, woodland, or grassland present.
<i>Dicranostegia orcuttiana</i>	Orcutt's bird's-beak	None/None/2B. 1/Covered	Coastal scrub/annual herb (hemiparasitic)/(Mar)Apr–July(Sep)/30–1150	Low potential to occur. This species is primarily associated with seasonally dry drainages adjacent to riparian habitat, and is considered nearly extirpated in San Diego County (Reiser 2001).

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Dudleya attenuata</i> ssp. <i>attenuata</i>	Orcutt's dudleya	None/None/2B. 1/None	Coastal bluff scrub, Chaparral, Coastal scrub; rocky or gravelly/perennial herb/May–July/5–165	Low potential to occur. There is coastal scrub, however this perennial herb would have been observed during surveys.
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	Blochman's dudleya	None/None/1B. 1/None	Coastal bluff scrub, Chaparral, Coastal scrub, Valley and foothill grassland; rocky, often clay or serpentinite/perennial herb/Apr–June/15–1475	Low potential to occur. There is coastal scrub, however this perennial herb would have been observed during surveys.
<i>Dudleya variegata</i>	variegated dudleya	None/None/1B. 2/Covered, Narrow Endemic	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland, Vernal pools; clay/perennial herb/Apr–June/5–1905	Low potential to occur. There is coastal scrub, however this perennial herb would have been observed during surveys.
<i>Dudleya viscida</i>	sticky dudleya	None/None/1B. 2/Covered	Coastal bluff scrub, Chaparral, Cismontane woodland, Coastal scrub; rocky/perennial herb/May–June/30–1805	Low potential to occur. There is no rocky habitat present on the site and the species is perennial and would have been observed during surveys if present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Ericameria palmeri</i> var. <i>palmeri</i>	Palmer's goldenbush	None/None/1B. 1/Covered, Narrow Endemic	Chaparral, Coastal scrub; mesic/perennial evergreen shrub/(July)Sep–Nov/95–1970	Low potential to occur. Coastal scrub is present; however, this species is primarily associated with mesic chaparral habitat (Reiser 2001).
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button-celery	FE/SE/1B.1/Covered	Coastal scrub, Valley and foothill grassland, Vernal pools; mesic/annual / perennial herb/Apr–June/65–2035	Not expected to occur. This species is primarily associated with vernal pools (Reiser 2001), which do not occur on the project site.
<i>Erysimum ammophilum</i>	sand-loving wallflower	None/None/1B. 2/Covered	Chaparral (maritime), Coastal dunes, Coastal scrub; sandy, openings/perennial herb/Feb–June/0–195	Low potential to occur. There is coastal scrub present, however there is no suitable sandy soil and this species is not known to occur within the vicinity (CDFW 2019).
<i>Euphorbia misera</i>	cliff spurge	None/None/2B. 2/None	Coastal bluff scrub, Coastal scrub, Mojavean desert scrub; rocky/perennial shrub/Dec–Aug(Oct)/30–1640	Low potential to occur. There is coastal scrub present, however there is no coastal bluff scrub or rocky soil present, and this perennial shrub would have been observed if present.

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Ferocactus viridescens</i>	San Diego barrel cactus	None/None/2B.1/Covered	Chaparral, Coastal scrub, Valley and foothill grassland, Vernal pools/perennial stem succulent/May-June/5-1475	Low potential to occur. There is coastal scrub present, however there is no chaparral on site and this perennial succulent would have been observed if present.
<i>Frankenia palmeri</i>	Palmer's frankenia	None/None/2B.1/None	Coastal dunes, Marshes and swamps (coastal salt), Playas/perennial herb/May-July/0-35	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Fremontodendron mexicanum</i>	Mexican flannelbush	FE/SR/1B.1/Covered	Closed-cone coniferous forest, Chaparral, Cismontane woodland; gabbroic, metavolcanic, or serpentinite/perennial evergreen shrub/Mar-June/30-2350	Not expected to occur. No suitable vegetation present. This species is associated with closed-cone coniferous forest and alluvial benches along ephemeral drainages, which does not occur on site (USFWS 2009c).
<i>Galium proliferum</i>	desert bedstraw	None/None/2B.2/None	Joshua tree woodland, Mojavean desert scrub, Pinyon and juniper woodland; rocky, carbonate (limestone)/annual herb/Mar-June/3900-5350	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Geothallus tuberosus</i>	Campbell's liverwort	None/None/1B.1/None	Coastal scrub (mesic), Vernal pools; soil/ephemeral liverwort/N.A./30-1970	Low potential to occur. There is coastal scrub present, however there are no vernal pools and this species is not known to occur within the vicinity (CDFW 2019).
<i>Grindelia hallii</i>	San Diego gumplant	None/None/1B.2/None	Chaparral, Lower montane coniferous forest, Meadows and seeps, Valley and foothill grassland/perennial herb/May-Oct/605-5725	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Harpagonella palmeri</i>	Palmer's grapplinghook	None/None/4.2/None	Chaparral, Coastal scrub, Valley and foothill grassland; Clay; open grassy areas within shrubland/annual herb/Mar-May/65-3135	Low potential to occur. There is coastal scrub present, however there is no grassland or suitable clay soil on site.
<i>Hesperocyparis forbesii</i>	Tecate cypress	None/None/1B.1/Covered	Closed-cone coniferous forest, Chaparral; clay, gabbroic or metavolcanic/perennial evergreen tree/N.A./260-4920	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).

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SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i>	beach goldenaster	None/None/1B. 1/None	Chaparral (coastal), Coastal dunes, Coastal scrub/perennial herb/Mar–Dec/0–4020	Low potential to occur. There is coastal scrub present, however there is no chaparral or coastal dunes on site.
<i>Holocarpha virgata</i> ssp. <i>elongata</i>	graceful tarplant	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland/annual herb/May–Nov/195–3610	Low potential to occur. There is coastal scrub present, however there is no chaparral, woodland, or grassland present.
<i>Hordeum intercedens</i>	vernal barley	None/None/3.2/None	Coastal dunes, Coastal scrub, Valley and foothill grassland (saline flats and depressions), Vernal pools/annual herb/Mar–June/15–3280	Low potential to occur. There is coastal scrub present, however there are no saline flats and depressions, and this species is not known to occur within the vicinity (CDFW 2019).
<i>Hosackia crassifolia</i> var. <i>otayensis</i>	Otay Mountain lotus	None/None/1B. 1/None	Chaparral (metavolcanic, often in disturbed areas)/perennial herb/May–Aug/1245–3295	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Isocoma menziesii</i> var. <i>decumbens</i>	decumbent goldenbush	None/None/1B. 2/None	Chaparral, Coastal scrub (sandy, often in disturbed areas)/perennial shrub/Apr–Nov/30–445	Low potential to occur. There is coastal scrub present, however there is no sandy soil and this perennial shrub would have been observed if present.
<i>Iva hayesiana</i>	San Diego marsh-elder	None/None/2B. 2/None	Marshes and swamps, Playas/perennial herb/Apr–Oct/30–1640	Not expected to occur. No suitable vegetation present.
<i>Juncus acutus</i> ssp. <i>leopoldii</i>	southwestern spiny rush	None/None/4.2/None	Coastal dunes (mesic), Meadows and seeps (alkaline seeps), Marshes and swamps (coastal salt)/perennial rhizomatous herb/(Mar)May–June/5–2955	Not expected to occur. No suitable vegetation present.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None/None/1B. 1/None	Marshes and swamps (coastal salt), Playas, Vernal pools/annual herb/Feb–June/0–4005	Not expected to occur. No suitable vegetation present.
<i>Lepechinia ganderi</i>	Gander's pitcher sage	None/None/1B. 3/Covered, Narrow Endemic	Closed-cone coniferous forest, Chaparral, Coastal scrub, Valley and foothill grassland; Gabbroic or metavolcanic/perennial shrub/June–July/1000–3295	Not expected to occur. The site is outside of the species' known elevation range. This species is not known to occur within the vicinity (CDFW 2019).

ATTACHMENT C

SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	None/None/4.3/None	Chaparral, Coastal scrub/annual herb/Jan–July/0–2905	Low potential to occur. There is coastal scrub present, however the site is disturbed and and not suitable for this species.
<i>Leptosyne maritima</i>	sea dahlia	None/None/2B.2/None	Coastal bluff scrub, Coastal scrub/perennial herb/Mar–May/15–490	Low potential to occur. There is coastal scrub, however there is no coastal bluff scrub and this perennial herb would have been observed if present.
<i>Lilium humboldtii</i> ssp. <i>ocellatum</i>	ocellated Humboldt lily	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Riparian woodland; openings/perennial bulbiferous herb/Mar–July(Aug)/95–5905	Low potential to occur. There is coastal scrub, however there is no forest or riparian woodland, and this species is not known to occur within the vicinity (CDFW 2019).
<i>Lycium californicum</i>	California box-thorn	None/None/4.2/None	Coastal bluff scrub, Coastal scrub/perennial shrub/(Dec)Mar,June,July,Aug/15–490	Low potential to occur. There is coastal scrub present, however there is no coastal bluff scrub and this perennial shrub would have been observed if present.
<i>Microseris douglasii</i> ssp. <i>platycarpha</i>	small-flowered microseris	None/None/4.2/None	Cismontane woodland, Coastal scrub, Valley and foothill grassland, Vernal pools; clay/annual herb/Mar–May/45–3510	Low potential to occur. There is coastal scrub present, however there is no woodland, grassland, or vernal pools on site.
<i>Mobergia calculiformis</i>	light gray lichen	//3/None	Coastal scrub (?); On rocks/crustose lichen (saxicolous)/N.A./30–35	Not expected to occur. The site is outside of the species' known elevation range. This species is not known to occur within the vicinity (CDFW 2019).
<i>Monardella hypoleuca</i> ssp. <i>lanata</i>	felt-leaved monardella	None/None/1B.2/Covered	Chaparral, Cismontane woodland/perennial rhizomatous herb/June–Aug/980–5165	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Monardella stoneana</i>	Jennifer's monardella	None/None/1B.2/None	Closed-cone coniferous forest, Chaparral, Coastal scrub, Riparian scrub; usually rocky intermittent streambeds/perennial herb/June–Sep/30–2590	Low potential to occur. There is coastal scrub present, however there is no riparian scrub or stream beds present on site. This species is not known to occur within the vicinity (CDFW 2019).
<i>Monardella viminea</i>	willowy monardella	FE/SE/1B.1/Covered, Narrow Endemic	Chaparral, Coastal scrub, Riparian forest, Riparian scrub, Riparian woodland; alluvial	Low potential to occur. This species is a geographically narrow endemic species restricted to three watersheds north of Kearny Mesa, and

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SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
			ephemeral washes/perennial herb/June–Aug/160–740	therefore the site is outside of the species known geographic range (USFWS 2012). This species is not known to occur within the vicinity (CDFW 2019).
<i>Mucronea californica</i>	California spineflower	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland; sandy/annual herb/Mar–July(Aug)/0–4595	Low potential to occur. There is coastal scrub present, however there are no coastal dunes and this species is not known to occur within the vicinity (CDFW 2019).
<i>Myosurus minimus</i> ssp. <i>apus</i>	little mousetail	None/None/3.1/Covered	Valley and foothill grassland, Vernal pools (alkaline)/annual herb/Mar–June/65–2100	Not expected to occur. No suitable vegetation present.
<i>Nama stenocarpa</i>	mud nama	None/None/2B.2/None	Marshes and swamps (lake margins, riverbanks)/annual / perennial herb/Jan–July/15–1640	Not expected to occur. No suitable vegetation present. This species is associated with the muddy banks of lakes and ponds (Reiser 2001).
<i>Navarretia fossalis</i>	spreading navarretia	FT/None/1B.1/Covered	Chenopod scrub, Marshes and swamps (assorted shallow freshwater), Playas, Vernal pools/annual herb/Apr–June/95–2150	Not expected to occur. No suitable vegetation present. This species is primarily associated with vernal pools (Reiser 2001) which do not occur on the project site.
<i>Navarretia prostrata</i>	prostrate vernal pool navarretia	None/None/1B.1/None	Coastal scrub, Meadows and seeps, Valley and foothill grassland (alkaline), Vernal pools; Mesic/annual herb/Apr–July/5–3970	Not expected to occur. This species is restricted to vernal pools (Reiser 2001), which do not occur on the project site. This species is not known to occur within the vicinity (CDFW 2019).
<i>Nemacaulis denudata</i> var. <i>denudata</i>	coast woolly-heads	None/None/1B.2/None	Coastal dunes/annual herb/Apr–Sep/0–330	Not expected to occur. No suitable vegetation present.
<i>Nemacaulis denudata</i> var. <i>gracilis</i>	slender cottonheads	None/None/2B.2/None	Coastal dunes, Desert dunes, Sonoran desert scrub/annual herb/(Mar)Apr–May/-160–1310	Not expected to occur. No suitable vegetation present.
<i>Ophioglossum californicum</i>	California adder's-tongue	None/None/4.2/None	Chaparral, Valley and foothill grassland, Vernal pools (margins); mesic/perennial rhizomatous herb/(Dec)Jan–June/195–1720	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).

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SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Orcuttia californica</i>	California Orcutt grass	FE/SE/1B.1/Covered	Vernal pools/annual herb/Apr–Aug/45–2165	Not expected to occur. No suitable vegetation present. This species is restricted to vernal pools (USFWS 2011); however, vernal pools do not occur on site.
<i>Ornithostaphylos oppositifolia</i>	Baja California birdbush	None/SE/2B.1/None	Chaparral/perennial evergreen shrub/Jan–Apr/180–2625	Not expected to occur. No suitable vegetation present.
<i>Orobanche parishii</i> ssp. <i>brachyloba</i>	short-lobed broomrape	None/None/4.2/None	Coastal bluff scrub, Coastal dunes, Coastal scrub; sandy/perennial herb (parasitic)/Apr–Oct/5–1000	Low potential to occur. This species is primarily associated with coastal bluff scrub and coastal dune habitat (Reiser 2001).
<i>Pentachaeta aurea</i> ssp. <i>aurea</i>	golden-rayed pentachaeta	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Riparian woodland, Valley and foothill grassland/annual herb/Mar–July/260–6070	Low potential to occur. There is coastal scrub present, however there is no riparian woodland or chaparral, and this species is not known to occur within the vicinity (CDFW 2019).
<i>Phacelia stellaris</i>	Brand's star phacelia	None/None/1B.1/None	Coastal dunes, Coastal scrub/annual herb/Mar–June/0–1310	Low potential to occur. There is coastal scrub present, however there are no coastal dunes on site.
<i>Pickeringia montana</i> var. <i>tomentosa</i>	woolly chaparral-pea	None/None/4.3/None	Chaparral; Gabbroic, granitic, clay/evergreen shrub/May–Aug/0–5575	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Piperia cooperi</i>	chaparral rein orchid	None/None/4.2/None	Chaparral, Cismontane woodland, Valley and foothill grassland/perennial herb/Mar–June/45–5200	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Pogogyne abramsii</i>	San Diego mesa mint	FE/SE/1B.1/Covered	Vernal pools/annual herb/Mar–July/295–655	Not expected to occur. No suitable vegetation present. This species is restricted to vernal pools (USFWS 2010); however, no vernal pools occur on site. This species is not known to occur within the vicinity (CDFW 2019).
<i>Pogogyne nudiuscula</i>	Otay Mesa mint	FE/SE/1B.1/Covered	Vernal pools/annual herb/May–July/295–820	Not expected to occur. No suitable vegetation present.

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SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Quercus dumosa</i>	Nuttall's scrub oak	None/None/1B.1/None	Closed-cone coniferous forest, Chaparral, Coastal scrub; sandy, clay loam/perennial evergreen shrub/Feb-Apr(May-Aug)/45-1310	Low potential to occur. Suitable coastal scrub habitat is present; however, this perennial species is associated primarily with chaparral habitats (Reiser 2001).
<i>Quercus engelmannii</i>	Engelmann oak	None/None/4.2/None	Chaparral, Cismontane woodland, Riparian woodland, Valley and foothill grassland/perennial deciduous tree/Mar-June/160-4265	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Ribes viburnifolium</i>	Santa Catalina Island currant	None/None/1B.2/None	Chaparral, Cismontane woodland/perennial evergreen shrub/Feb-Apr/95-1150	Not expected to occur. No suitable vegetation present.
<i>Romneya coulteri</i>	Coulter's matilija poppy	None/None/4.2/None	Chaparral, Coastal scrub; Often in burns/perennial rhizomatous herb/Mar-July(Aug)/65-3935	Low potential to occur. There is coastal scrub present, however there is no chaparral and this species is not known to occur within the vicinity (CDFW 2019).
<i>Rosa minutifolia</i>	small-leaved rose	None/SE/2B.1/C overed	Chaparral, Coastal scrub/perennial deciduous shrub/Jan-June/490-525	Not expected to occur. The site is outside of the species' known elevation range.
<i>Salvia munzii</i>	Munz's sage	None/None/2B.2/None	Chaparral, Coastal scrub/perennial evergreen shrub/Feb-Apr/375-3495	Not expected to occur. The site is outside of the species' known elevation range. This species is not known to occur within the vicinity (CDFW 2019).
<i>Selaginella cinerascens</i>	ashy spike-moss	None/None/4.1/None	Chaparral, Coastal scrub/perennial rhizomatous herb/N.A./65-2100	Low potential to occur. There is coastal scrub present, however there is no chaparral and this perennial herb would have been observed if present.
<i>Senecio aphanactis</i>	chaparral ragwort	None/None/2B.2/None	Chaparral, Cismontane woodland, Coastal scrub; sometimes alkaline/annual herb/Jan-Apr(May)/45-2625	Low potential to occur. There is limited suitable coastal scrub present, however suitable alkaline soils do not occur on site.
<i>Sphaerocarpos drewei</i>	bottle liverwort	None/None/1B.1/None	Chaparral, Coastal scrub; openings, soil/ephemeral liverwort/N.A./295-1970	Low potential to occur. There is coastal scrub present, however there is no chaparral or ephemeral channels, and this species is not known to occur within the vicinity (CDFW 2019).

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SPECIAL-STATUS PLANT SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP Subarea Plan)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Stemodia durantifolia</i>	purple stemodia	None/None/2B. 1/None	Sonoran desert scrub (often mesic, sandy)/perennial herb/(Jan)Apr,June,Aug,Sep,Oct,Dec/590–985	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Stipa diegoensis</i>	San Diego County needle grass	None/None/4.2/None	Chaparral, Coastal scrub; rocky, often mesic/perennial herb/Feb–June/30–2625	Low potential to occur. There is coastal scrub present, however there is no chaparral or rocky habitat onsite and this perennial herb would have been observed if present.
<i>Streptanthus bernardinus</i>	Laguna Mountains jewelflower	None/None/4.3/None	Chaparral, Lower montane coniferous forest/perennial herb/May–Aug/2195–8200	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Stylocline citroleum</i>	oil neststraw	None/None/1B. 1/None	Chenopod scrub, Coastal scrub, Valley and foothill grassland; clay/annual herb/Mar–Apr/160–1310	Low potential to occur. There is coastal scrub present, however there is no grassland or suitable clay soil on site, and this species is not known to occur within the vicinity (CDFW 2019).
<i>Suaeda esteroa</i>	estuary seablite	None/None/1B. 2/None	Marshes and swamps (coastal salt)/perennial herb/(May)July–Oct(Jan)/0–15	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Tetracoccus dioicus</i>	Parry's tetracoccus	None/None/1B. 2/Covered	Chaparral, Coastal scrub/perennial deciduous shrub/Apr–May/540–3280	Not expected to occur. The site is outside of the species' known elevation range.
<i>Tortula californica</i>	California screw-moss	None/None/1B. 2/None	Chenopod scrub, Valley and foothill grassland; sandy, soil/moss/N.A./30–4790	Not expected to occur. No suitable vegetation present.
<i>Viguiera laciniata</i>	San Diego County viguiera	None/None/4.3/None	Chaparral, Coastal scrub/perennial shrub/Feb–June(Aug)/195–2460	Low potential to occur. There is coastal scrub present, however there is no chaparral and this perennial shrub would have been observed if present.

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Attachment D

Special-Status Wildlife Species Potentially Occurring within
the Project Study Area

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SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
Amphibians				
<i>Anaxyrus californicus</i>	arroyo toad	FE/SSC/Covered	Semi-arid areas near washes, sandy riverbanks, riparian areas, palm oasis, Joshua tree, mixed chaparral and sagebrush; stream channels for breeding (typically third order); adjacent stream terraces and uplands for foraging and wintering	Not expected to occur. No suitable wash, stream channel, or riparian area present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Spea hammondi</i>	western spadefoot	None/SSC/None	Primarily grassland and vernal pools, but also in ephemeral wetlands that persist at least 3 weeks in chaparral, coastal scrub, valley-foothill woodlands, pastures, and other agriculture	Not expected to occur. No suitable ephemeral wetland or vernal pool present.
Reptiles				
<i>Anniella stebbinsi</i>	southern California legless lizard	None/SSC/None	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and moist sandy or loose, loamy soils	Low potential to occur. There is some suitable vegetation present onsite, however the habitat is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Arizona elegans occidentalis</i>	California glossy snake	None/SSC/None	Commonly occurs in desert regions throughout southern California. Prefers open sandy areas with scattered brush. Also found in rocky areas.	Low potential to occur. There is some brush present, however there are no sandy soils.
<i>Aspidoscelis hyperythra</i>	orange-throated whiptail	None/WL/Covered	Low-elevation coastal scrub, chaparral, and valley-foothill hardwood	Low potential to occur. There is some suitable vegetation present onsite, however the habitat is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Aspidoscelis tigris stejnegeri</i>	San Diegan tiger whiptail	None/SSC/None	Hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.	Low potential to occur. There is some suitable vegetation present onsite, however the habitat is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. In

ATTACHMENT D

SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
				addition, this species is not known to occur within the vicinity (CDFW 2019).
<i>Chelonia mydas</i>	green sea turtle	FT/None/None	Shallow waters of lagoons, bays, estuaries, mangroves, eelgrass, and seaweed beds	Not expected to occur. No suitable waters present.
<i>Crotalus ruber</i>	red diamondback rattlesnake	None/SSC/None	Coastal scrub, chaparral, oak and pine woodlands, rocky grasslands, cultivated areas, and desert flats	Low potential to occur. There is coastal scrub present, however there is no chaparral or rocky grassland on site.
<i>Diadophis punctatus similis</i>	San Diego ringneck snake	None/None/None	Moist habitats including wet meadows, rocky hillsides, gardens, farmland grassland, chaparral, mixed-conifer forest, and woodland habitats	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Masticophis fuliginosus</i>	Baja California coachwhip	None/SSC/None	In California restricted to southern San Diego County, where it is known from grassland and coastal sage scrub. Open areas in grassland and coastal sage scrub.	Low potential to occur. There is some suitable vegetation present onsite, however the habitat is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC/Covered	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats	Low potential to occur. There is limited coastal scrub present, however it is disturbed and the site is surrounded by urban development with no connectivity to other natural areas. In addition, there is no chaparral, grassland, or sandy soils.
<i>Plestiodon skiltonianus interparietalis</i>	Coronado skink	None/WL/None	Woodlands, grasslands, pine forests, and chaparral; rocky areas near water	Not expected to occur. No suitable vegetation present.
<i>Salvadora hexalepis virgultea</i>	coast patch-nosed snake	None/SSC/None	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	Low potential to occur. There is some suitable vegetation present onsite, however the habitat is primarily disturbed and the site is surrounded by urban development with no

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SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
				connectivity to other natural areas. In addition, this species is not known to occur within the vicinity (CDFW 2019).
<i>Thamnophis hammondi</i>	two-striped gartersnake	None/SSC/None	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	Not expected to occur. No suitable vegetation present.
Birds				
<i>Accipiter cooperii</i> (nesting)	Cooper's hawk	None/WL/Covered	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats often near water	Low potential to occur. No suitable nesting or foraging habitat present.
<i>Agelaius tricolor</i> (nesting colony)	tricolored blackbird	BCC/SSC, ST/Covered	Nests near freshwater, emergent wetland with cattails or tules, but also in Himalayan blackberry; forages in grasslands, woodland, and agriculture	Not expected to occur. No suitable vegetation present.
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	None/WL/Covered	Nests and forages in open coastal scrub and chaparral with low cover of scattered scrub interspersed with rocky and grassy patches	Low potential to occur. There is coastal scrub present, however there are no rocky and grassy patches on site.
<i>Artemisiospiza belli belli</i>	Bell's sage sparrow	BCC/WL/None	Nests and forages in coastal scrub and dry chaparral; typically in large, unfragmented patches dominated by chamise; nests in more dense patches but uses more open habitat in winter	Not expected to occur. There are no unfragmented patches of chamise present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Athene cunicularia</i> (burrow sites & some wintering sites)	burrowing owl	BCC/SSC/Covered	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	Moderate potential to occur. Suitable habitat is present, however protocol surveys for the species were conducted and no owls or suitable burrows were identified on the site.
<i>Buteo swainsoni</i> (nesting)	Swainson's hawk	BCC/ST/Covered	Nests in open woodland and savanna, riparian, and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields and pasture	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).

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SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
<i>Campylorhynchus brunneicapillus sandiegensis</i> (San Diego & Orange Counties only)	coastal cactus wren	BCC/SSC/Covered	Southern cactus scrub patches	Not expected to occur. No suitable vegetation present.
<i>Charadrius alexandrinus nivosus</i> (nesting)	western snowy plover	FT, BCC/SSC/Covered	On coasts nests on sandy marine and estuarine shores; in the interior nests on sandy, barren or sparsely vegetated flats near saline or alkaline lakes, reservoirs, and ponds	Not expected to occur. No suitable vegetation present and the site is not coastal and contains no saline or alkaline features.
<i>Circus hudsonius</i> (nesting)	northern harrier	None/SSC/Covered	Nests in open wetlands (marshy meadows, wet lightly-grazed pastures, old fields, freshwater and brackish marshes); also in drier habitats (grassland and grain fields); forages in grassland, scrubs, rangelands, emergent wetlands, and other open habitats	Low potential to occur. There is some suitable foraging habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Coccyzus americanus occidentalis</i> (nesting)	western yellow- billed cuckoo	FT, BCC/SE/None	Nests in dense, wide riparian woodlands and forest with well-developed understories	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Coturnicops noveboracensis</i>	yellow rail	BCC/SSC/None	Nesting requires wet marsh/sedge meadows or coastal marshes with wet soil and shallow, standing water	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Empidonax traillii extimus</i> (nesting)	southwestern willow flycatcher	FE/SE/Covered	Nests in dense riparian habitats along streams, reservoirs, or wetlands; uses variety of riparian and shrubland habitats during migration	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Eremophila alpestris actia</i>	California horned lark	None/WL/None	Nests and forages in grasslands, disturbed lands, agriculture, and beaches; nests in alpine fell fields of the Sierra Nevada	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Falco peregrinus anatum</i> (nesting)	American peregrine falcon	FDL, BCC/FP, SDL/Covered	Nests on cliffs, buildings, and bridges; forages in wetlands, riparian, meadows, croplands, especially where waterfowl are present	Low potential to occur. The site is primarily disturbed and surrounded

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SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
				by urban development with little to no hunting opportunities for this species.
<i>Icteria virens</i> (nesting)	yellow-breasted chat	None/SSC/None	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush	Not expected to occur. There is no suitable habitat present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Laterallus jamaicensis coturniculus</i>	California black rail	BCC/FP, ST/None	Tidal marshes, shallow freshwater margins, wet meadows, and flooded grassy vegetation; suitable habitats are often supplied by canal leakage in Sierra Nevada foothill populations	Not expected to occur. No suitable vegetation present.
<i>Pandion haliaetus</i> (nesting)	osprey	None/WL/None	Large waters (lakes, reservoirs, rivers) supporting fish; usually near forest habitats, but widely observed along the coast	Not expected to occur. No suitable water resources present for foraging. This species is not known to occur within the vicinity (CDFW 2019).
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	None/SE/Covered	Nests and forages in coastal saltmarsh dominated by pickleweed (<i>Salicornia</i> spp.)	Not expected to occur. No suitable vegetation present.
<i>Pelecanus occidentalis californicus</i> (nesting colonies & communal roosts)	California brown pelican	FDL/FP, SDL/Covered	Forages in warm coastal marine and estuarine environments; in California, nests on dry, rocky offshore islands	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Phalacrocorax auritus</i> (nesting colony)	double-crested cormorant	None/WL/None	Nests in riparian trees near ponds, lakes, artificial impoundments, slow-moving rivers, lagoons, estuaries, and open coastlines; winter habitat includes lakes, rivers, and coastal areas	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Polioptila californica californica</i>	coastal California gnatcatcher	FT/SSC/Covered	Nests and forages in various sage scrub communities, often dominated by California sagebrush and buckwheat; generally avoids nesting in areas with a slope of greater than 40%; majority of nesting at less than 1,000 feet above mean sea level	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Rallus obsoletus levipes</i>	Ridgway's rail	FE/SE, FP/Covered	Coastal wetlands, brackish areas, coastal saline emergent wetlands	Not expected to occur. No suitable vegetation present.

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
<i>Setophaga petechia</i> (nesting)	yellow warbler	BCC/SSC/None	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Sternula antillarum browni</i> (nesting colony)	California least tern	FE/FP, SE/Covered	Forages in shallow estuaries and lagoons; nests on sandy beaches or exposed tidal flats	Not expected to occur. No suitable vegetation present.
<i>Vireo bellii pusillus</i> (nesting)	least Bell's vireo	FE/SE/Covered	Nests and forages in low, dense riparian thickets along water or along dry parts of intermittent streams; forages in riparian and adjacent shrubland late in nesting season	Not expected to occur. No suitable vegetation present.
Fishes				
<i>Oncorhynchus mykiss irideus</i> pop. 10	southern steelhead - southern California DPS	FE/None/None	Clean, clear, cool, well-oxygenated streams; needs relatively deep pools in migration and gravelly substrate to spawn	Not expected to occur. The site is outside of the species' known geographic range and there are no suitable water resources present.
Mammals				
<i>Antrozous pallidus</i>	pallid bat	None/SSC/None	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in man-made structures and trees	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. There are no rocky outcrops present.
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	None/SSC/None	Coastal scrub, mixed chaparral, sagebrush, desert wash, desert scrub, desert succulent shrub, pinyon-juniper, and annual grassland	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Choeronycteris mexicana</i>	Mexican long-tongued bat	None/SSC/None	Desert and montane riparian, desert succulent scrub, desert scrub, and pinyon-juniper woodland; roosts in caves, mines, and buildings	Not expected to occur. No suitable vegetation present.

ATTACHMENT D

SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None/SSC/None	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, man-made structures, and tunnels	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC/None	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. There are no canyons or cliffs present on the site.
<i>Lasionycteris noctivagans</i>	silver-haired bat	None/None/None	Old-growth forest, maternity roosts in trees, large snags 50 feet aboveground; hibernates in hollow trees, rock crevices, buildings, mines, caves, and under sloughing bark; forages in or near coniferous or mixed deciduous forest, stream or river drainages	Not expected to occur. No suitable roosting or foraging habitat on the site. This species is not known to occur within the vicinity (CDFW 2019).
<i>Lasiurus blossevillii</i>	western red bat	None/SSC/None	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Lasiurus cinereus</i>	hoary bat	None/None/None	Forest, woodland riparian, and wetland habitats; also juniper scrub, riparian forest, and desert scrub in arid areas; roosts in tree foliage and sometimes cavities, such as woodpecker holes	Not expected to occur. No suitable vegetation present.
<i>Lasiurus xanthinus</i>	western yellow bat	None/SSC/None	Valley-foothill riparian, desert riparian, desert wash, and palm oasis habitats; below 2,000 feet above mean sea level; roosts in riparian and palms	Not expected to occur. No suitable vegetation present for roosting or foraging. This species is not known to occur within the vicinity (CDFW 2019).
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	None/SSC/None	Arid habitats with open ground; grasslands, coastal scrub, agriculture, disturbed areas, and rangelands	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
				development with no connectivity to other natural areas.
<i>Myotis ciliolabrum</i>	western small-footed myotis	None/None/None	Arid woodlands and shrublands, but near water; roosts in caves, crevices, mines, abandoned buildings	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. The site is not adjacent to any water resources.
<i>Myotis evotis</i>	long-eared myotis	None/None/None	Brush, woodland, and forest habitats from sea level to 9,000 feet above MSL; prefers coniferous habitats; forages along habitat edges, in open habitats, and over water; roosts in buildings, crevices, under bark, and snags; uses caves as night roosts	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. There are limited opportunities for roosting for this species.
<i>Myotis yumanensis</i>	Yuma myotis	None/None/None	Riparian, arid scrublands and deserts, and forests associated with water (streams, rivers, tinajas); roosts in bridges, buildings, cliff crevices, caves, mines, and trees	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	None/SSC/None	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	None/SSC/None	Pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oases; roosts in high cliffs or rock outcrops with drop-offs, caverns, and buildings	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
				other natural areas. There are no rock outcrops or suitable desert habitats on the site.
<i>Nyctinomops macrotis</i>	big free-tailed bat	None/SSC/None	Rocky areas; roosts in caves, holes in trees, buildings, and crevices on cliffs and rocky outcrops; forages over water	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. There are no rocky outcrops present on the site.
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	FE/SSC/None	fine-grained sandy substrates in open coastal strand, coastal dunes, and river alluvium	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. There are no suitable fine-grained sandy soils present onsite.
<i>Taxidea taxus</i>	American badger	None/SSC/Covered	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas.
Invertebrates				
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	FE/None/Covered	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. There are no vernal pools on the site.
<i>Callophrys thornei</i>	Thorne's hairstreak	None/None/Covered	Interior cypress woodland dominated by host plant <i>Hesperocyparis forbesii</i> (Tecate cypress)	Not expected to occur. There is no suitable vegetation on the site. This species is not known to occur within the vicinity (CDFW 2019).

ATTACHMENT D

SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
<i>Cicindela gabbii</i>	western tidal-flat tiger beetle	None/None/None	Inhabits estuaries and mudflats along the coast of Southern California	Not expected to occur. There is no suitable vegetation or land covers on the site.
<i>Cicindela hirticollis gravida</i>	sandy beach tiger beetle	None/None/None	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico	Not expected to occur. The site does not contain and is not adjacent to any water resources.
<i>Cicindela latesignata latesignata</i>	western beach tiger beetle	None/None/None	Mudflats and beaches in coastal Southern California	Not expected to occur. No suitable vegetation or habitat present. The site is not coastal.
<i>Cicindela senilis frosti</i>	senile tiger beetle	None/None/None	Inhabits marine shoreline, from Central California coast south to saltmarshes of San Diego; also found at Lake Elsinore	Not expected to occur. No suitable vegetation or habitat present. The site is not coastal and does not contain water resources.
<i>Cicindela latesignata obliviosa</i>	Oblivious tiger beetle	None/None/None	Inhabited the Southern California coastline, from La Jolla north to the Orange County line. Occupied saline mudflats and moist sandy spots in estuaries of small streams in the lower zone. Has not been observed in 20 years. The oblivious tiger beetle (<i>C. l. obliviosa</i>) is no longer the accepted name for this species (ITIS 2016).	Not expected to occur. No suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Coelus globosus</i>	globose dune beetle	None/None/None	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico	Not expected to occur. No suitable vegetation present.
<i>Danaus plexippus pop. 1</i>	monarch	None/None/None	Wind-protected tree groves with nectar sources and nearby water sources	Not expected to occur. The site is outside of the species' known geographic range and there is no suitable vegetation present.
<i>Euphydryas editha quino</i>	quino checkerspot butterfly	FE/None/None	Annual forblands, grassland, open coastal scrub and chaparral; often soils with cryptogamic crusts and fine-textured clay; host plants include <i>Plantago erecta</i> , <i>Antirrhinum coulterianum</i> , and <i>Plantago patagonica</i> (Silverado Occurrence Complex)	Not expected to occur. No suitable vegetation present.

ATTACHMENT D

SPECIAL-STATUS WILDLIFE SPECIES POTENTIALLY OCCURRING WITHIN THE PROJECT STUDY AREA

Scientific Name	Common Name	Status (Federal/State/MSCP Subarea Plan)	Habitat	Potential to Occur
<i>Lycaena hermes</i>	Hermes copper	FC/None/None	Mixed woodlands, chaparral, and coastal scrub	Low potential to occur. There is some suitable habitat present onsite, however it is primarily disturbed and the site is surrounded by urban development with no connectivity to other natural areas. This species is not known to occur within the vicinity (CDFW 2019).
<i>Melitta californica</i>	California mellitid bee	None/None/None	Desert regions of southwestern Arizona, southeastern California, and Baja California, Mexico; also collected from Torrey Pines, San Diego County	Not expected to occur. There is no suitable vegetation present. This species is not known to occur within the vicinity (CDFW 2019).
<i>Panoquina errans</i>	wandering skipper	None/None/Covered	Saltmarsh	Not expected to occur. No suitable vegetation or habitats present.
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	FE/None/Covered	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. No vernal pools present on the project site.
<i>Tryonia imitator</i>	mimic tryonia (=California brackishwater snail)	None/None/None	Inhabits coastal lagoons, estuaries, and saltmarshes, from Sonoma County south to San Diego County	Not expected to occur. The site is not coastal and there are no water resources present.



Attachment E

Habitat Loss and Incidental Take Ordinance Findings

APPENDIX E

HABITAT LOSS AND INCIDENTAL TAKE ORDINANCE FINDINGS

The purpose of the Habitat Loss and Incidental Take (HLIT) regulations is to protect and conserve native habitat within the City of Chula Vista and the viability of the species supported by those habitats. HLIT regulations are intended to implement the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan (City 2003) and ensure that development occurs in a manner that protects the overall quality of the habitat resources, encourages a sensitive form of development, and retains biodiversity and interconnected habitats. HLIT regulations also intend to protect public health, safety, and welfare (Chula Vista Municipal Code [CVMC] 17.35 et seq.).

Projects within the City of Chula Vista's jurisdiction are required to comply with the City of Chula Vista's MSCP Subarea Plan. This includes obtaining a HLIT permit pursuant to the HLIT Ordinance. The proposed Encompass Health Project is subject to this ordinance because, as stated in Section 5.2.2 Habitat Loss and Incidental Take Ordinance (City 2003), the Subarea Plan requires issuance of an HLIT permit for "all development within the City's jurisdiction which is not located within the Development Areas of Covered Projects prior to issuance of any land development permit". The HLIT regulations apply to the earliest decision on any entitlement related to a Project Area located within the following mapped areas identified in the Chula Vista MSCP Subarea Plan (unless exempt as noted): (1) 100% Conservation Areas, (2) 75-100% Conservation Areas, and (3) Development Areas outside of Covered Projects.

The following are exempt from the requirements of the HLIT Ordinance:

1. Development of a Project Area that is one acre or less in size and located entirely in a mapped Development Area outside of Covered Projects.
2. Development of a Project Area which is located entirely within the mapped Development Area outside Covered Projects, and where it has been demonstrated to the satisfaction of the Director of Planning and Building, or his/her designee, that no Sensitive Biological Resources exist on the Project Area.
3. Development that is limited to interior modifications or repairs and any exterior repairs, alterations or maintenance that does not increase the footprint of an existing building or accessory structure, which will not encroach into identified Sensitive Biological Resources during or after construction.
4. Any project within the Development Area of a Covered Project.
5. Any project that has an effective incidental take permit from the Wildlife Agencies.
6. Continuance of Agricultural Operations.

Proposed Project Areas

The proposed project is within the City's jurisdiction (outside the Preserve) and is not categorized as a "covered project". In addition, exemption status for the proposed project does not apply. The proposed project is not located within lands designated as the Minor or Major Amendment Areas. As such, a Subarea Plan Amendment is not required.

The HLIT Ordinance requires biological evaluation of all resources on site for project's within development areas outside of covered projects that contain sensitive biological resources.

Section 5.2.2 HLIT Ordinance of the Subarea Plan (City of Chula Vista 2003) requires issuance of an HLIT permit for "all development within the City's jurisdiction which is not located within the Development Areas of Covered Projects prior to issuance of any land development permit." As such, the entire project area would require issuance

APPENDIX E

HABITAT LOSS AND INCIDENTAL TAKE ORDINANCE FINDINGS

of an HLIT permit. Pursuant to the City's HLIT Ordinance, Section 17.35.080 – Required Findings for Issuance of an HLIT Permit, written findings need to be prepared and submitted to the City of Chula Vista for review and approval prior to issuance of any land development permits, including clearing and grubbing or grading permits. Tables A-1 and A-2 summarize the project's conformity to the Required Findings and General MSCP Development Regulations for the HLIT Ordinance.

The mitigation measures included in Tables A-1 and A-2 are from the Biological Resources Letter Report for the Encompass Health Project (BLR) and address the proposed project's significant effects on special-status species and vegetation. With implementation of the proposed mitigation, the identified impacts will be reduced to less than significant and maintain the project's conformity to the Required Findings and General MSCP Development Regulations for the HLIT Ordinance.

APPENDIX E

HABITAT LOSS AND INCIDENTAL TAKE ORDINANCE FINDINGS

Table A-1. Required Findings for Issuance of an HLIT Permit (Chula Vista Municipal Code 17.35.080)

Required Findings for Issuance of an HLIT Permit (Section 17.35.080):	Analysis	Consistency
The proposed development in the project area and associated mitigation are consistent with the Chula Vista MSCP Subarea Plan as adopted on May 13, 2003, and as may be amended from time to time, the MSCP Implementation Guidelines, and the development standards set forth in Section 17.35.100 of the Municipal Code.	The project would impact 0.06 acres of coastal sage scrub as shown on BLR Figure 4. Mitigation for these impacts has been established in accordance with the ratios in the Subarea Plan per MM-BIO-1 of the BLR. Impacts to coastal sage scrub will be mitigated at appropriate ratios through purchasing of credits at a City-approved mitigation bank (0.06 acre for banks within the MSCP Preserve or 0.9 acre for banks outside of the MSCP Preserve), 0.06 acre of coastal sage scrub compensatory habitat preservation in portions of coastal sage scrub habitat not proposed for development, or a minimum of 0.09 acre of coastal sage habitat restoration on portions of the site not proposed for development.	Consistent
The project area is physically suitable for the design and siting of the proposed development and the development results in minimum disturbance to sensitive biological resources, except impacts to natural vegetation in mapped development areas.	The project area is within a mapped development area and surrounded by existing development. A large majority of the project site consists of disturbed habitat and the limits of grading will only impact 0.06 acres of coastal sage scrub. Mitigation measures MM-BIO-1 through MM-BIO-3 will ensure sufficient compensatory mitigation for all impacted coastal sage scrub and avoidance of impacts to special-status species and nesting birds.	Consistent
The nature and extent of mitigation required as a condition of the permit is reasonably related to and calculated to alleviate negative impacts created in the project area.	Appropriate mitigation measures, consistent with the MSCP, have been proposed and will be implemented for this project and are provided in detail within the BLR.	Consistent
Narrow Endemic Findings	No narrow endemic species have been documented within the project site or are expected to occur.	Consistent
Wetland Findings	No impacts to wetlands will occur since none have been documented within the project site.	Consistent
Prior to the issuance of a Land Development Permit or Clearing and Grubbing Permit, the project proponent will be required to obtain any applicable state and federal permits, with copies provided to the Director of Planning and Building or his/her designee.	The proposed project will incorporate the removal of vegetation identified as Tier II on Table 5-3 of the Chula Vista MSCP Subarea Plan (City of Chula Vista 2003). Impacts to these areas require a permit issued pursuant to Section 17.35 of the Municipal Code (the HLIT Ordinance). The HLIT Ordinance includes a provision for issuance of a Land Development Permit or Clearing and Grubbing Permit that allows removal of vegetation, including removal of root systems. No jurisdictional aquatic resources have been identified within the impact area. Accordingly, no state or federal permits regarding jurisdictional aquatic resources will be required for the project.	Consistent
Impacts to wetlands have been avoided and/or minimized to the maximum extent practicable,	No impacts to wetlands will occur since none have been documented within the project site.	Consistent

APPENDIX E

HABITAT LOSS AND INCIDENTAL TAKE ORDINANCE FINDINGS

Table A-1. Required Findings for Issuance of an HLIT Permit (Chula Vista Municipal Code 17.35.080)

Required Findings for Issuance of an HLIT Permit (Section 17.35.080):	Analysis	Consistency
consistent with the City of Chula Vista MSCP Subarea Plan Section 5.2.4.		
Unavoidable impacts to wetlands have been mitigated pursuant to Section 17.35.110.	No impacts to wetlands will occur since none have been documented within the project site. No mitigation will be required.	Consistent

Notes: HLIT = Habitat Loss and Incidental Take; MSCP = Multiple Species Conservation Program; BTR = Biological Resources Technical Report; MM = Mitigation Measure; CDFW = California Department of Fish and Wildlife; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board.

Table A-2. General MSCP Development Regulations (Chula Vista Municipal Code 17.35.090).

General MSCP Development Requirements (Section 17.35.090)	Analysis	Consistency
Overall development within the Project Area including public facilities and circulation shall be located to minimize impacts to Sensitive Biological Resources in accordance with this chapter of the Chula Vista MSCP Subarea Plan and the MSCP Implementation Guidelines.	<p>The large majority of the project site consists of disturbed habitat and the limits of grading will only impact a small portion of coastal sage scrub in an effort to minimize impacts to Sensitive Biological Resources.</p> <p>As described in Section 5.1.9.3 of the HLIT Ordinance, compliance with several standard measures will be required to address habitat loss. Impacts to coastal sage scrub (Tier II) are considered significant under the City of Chula Vista's HLIT Ordinance and require mitigation (Subarea Plan Tables 5-3 and 5-6; City of Chula Vista 2003). Impacts to vegetation communities within the project area are provided in MM-BIO-1. Mitigation will be in accordance with the HLIT Ordinance, as described in Table 5-1.</p> <p>No narrow endemics for Chula Vista Subarea have been documented to occur within the project site.</p> <p>Prior to issuance of any land development permits, the applicant shall mitigate for direct impacts pursuant to Section 5.2.2 of the City of Chula Vista's MSCP Subarea Plan.</p>	Consistent
Pursuant to Chapter 15.04 of the Chula Vista Municipal Code, no Land Development or Clearing and Grubbing Permit that allows clearing, grubbing, or grading of Natural Vegetation shall be issued on any portion of a Project Area where impacts are proposed to	No impacts to wetlands will occur since none have been documented within the project site. Additionally, no Listed or Covered Species have been documented within the project site. Burrowing owl, a Covered Species, has moderate potential to occur within the project area but all potential impacts to the species will be avoided through implementation of MM-BIO-3.	Consistent

APPENDIX E

HABITAT LOSS AND INCIDENTAL TAKE ORDINANCE FINDINGS

Table A-2. General MSCP Development Regulations (Chula Vista Municipal Code 17.35.090).

General MSCP Development Requirements (Section 17.35.090)	Analysis	Consistency
Wetlands or Listed Non-covered Species until all applicable federal and state permits have been issued.		
Impacts to Wetlands shall be avoided to the maximum extent practicable. Where impacts to Wetlands are not avoided, impacts shall be minimized and mitigated pursuant to Section 17.35.110 of the Municipal Code.	No impacts to wetlands will occur since none have been documented within the project site.	Consistent
No temporary disturbance or storage of material or equipment is permitted in Sensitive Biological Resources unless the disturbance or storage occurs within an area approved by the City for development or unless it can be demonstrated that the disturbance or storage will not cause permanent habitat loss and the land will be revegetated and restored in accordance with the MSCP Implementation Guidelines.	The project would not temporarily disturb Sensitive Biological Resource Areas (i.e., coastal sage scrub). Although the project footprint will permanently impact (and mitigate for) a portion of the coastal sage scrub on the site, the remaining coastal sage scrub is not within the project footprint/limits of grading and will not be disturbed or used for storage of materials or equipment.	Consistent
Grading during wildlife breeding seasons shall be avoided or modified consistent with the requirements of the Chula Vista MSCP Subarea Plan and in accordance with the MSCP Implementation Guidelines.	To avoid any direct impacts associated with construction activities, MM-BIO-2 is proposed in the BLR to require construction to occur outside of the breeding season (February 1 through September 15), if possible. If construction must occur during the breeding season, MM-BIO-2 requires specific actions to be taken to avoid impacts consistent with the requirements of the Chula Vista MSCP Subarea Plan and in accordance with the MSCP Implementation Guidelines (e.g., nesting bird survey).	Consistent
All fuel modification brush management zones required as a result of new development and as required by the City Fire Marshal shall be located outside the Preserve.	All fuel modification zones will not include any areas within the Preserve since the project site is outside of the Preserve.	Consistent

Notes: MSCP = Multiple Species Conservation Program; HLIT = Habitat Loss and Incidental Take; MM = Mitigation Measure; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board; CDFW = California Department of Fish and Wildlife; BTR = Biological Resources Technical Report.

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City of Chula Vista. 2003. *City of Chula Vista MSCP Subarea Plan*. February 2003.
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