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Mr. Charles Pace
4030 Goldfinch Investments, LLC
3750 Sports Arena Blvd., #6
San Diego, CA 92110

Subject: Biological Resources Letter Report for the ResQue Ranch Project (Record ID: PDS2016-LDGRMJ-30067; APN 276-030-61-00)

Dear Mr. Pace:

At the request of 4030 Goldfinch Investments, LLC (Applicant) and the County of San Diego Planning & Development Services (County), HELIX Environmental Planning, Inc. (HELIX) has completed this biological resources letter report for the ResQue Project (project), which is proposed in the San Pasqual Valley area of San Diego County, California. The project would generally consist of the establishment of a five-acre horse ranch and equine therapy center and associated driveway grading.

The project site has already been graded without a grading permit, and the County issued a Stop Work Order on December 7, 2015. Staff from the California Regional Water Quality Control Board (RWQCB) and the County conducted an inspection of the property on January 19, 2016, and a Notice of Violation was issued by the RWQCB on March 11, 2016. In order to resolve the issue, the County required the Applicant to apply for a Grading Permit and California Environmental Quality Act (CEQA) review, and a biological letter report was requested in order to support the CEQA review. The purpose of this report is to document the biological conditions that existed within the study area prior to the grading and provide an analysis of potential impacts to sensitive biological resources with respect to local, state, and federal policy. The impacts analyzed in this report include additional grading proposed within the access easement to provide road access to the site. This report provides the biological resources technical documentation necessary for review under the CEQA by the County and other responsible agencies for the project.

Figures and other supporting information are provided as enclosures attached to this letter report.

SUMMARY

The proposed project is a horse rescue center, including a stable and corrals. The five-acre project site is located north of Highland Valley Road in the San Pasqual Valley area. Prior to grading, and based on a review of historic aerial photos and a field survey to view the site and adjacent areas, the project site and off-site impact area supported 0.1 acre of coast live oak woodland and oak root protection zone, 0.1 acre of Diegan coastal sage scrub, 4.6 acres of non-native grassland, and 0.5 acre of disturbed habitat, as well as less than 0.1 acre of orchards, and urban/developed land. No federally or state-listed plant or animal species were observed or were expected to occur on site in its pre-graded state. Prior to grading. the site had high potential to support the Belding's orange-throated whiptail (*Aspidoscelis hyperythra*) and red diamond rattlesnake (*Crotalus ruber ruber*), both of which are State Species of Special Concern and County Group 2 sensitive species. The turkey vulture (*Cathartes aura*), a County Group 1 species, was observed flying nearby, but it was not expected to nest on site in its pre-graded state. No other sensitive plant or animal species were observed or had a high potential to occur on site. The project impacts the entire project site and the off-site impact area. A small portion of an ephemeral stream channel that is non-wetland waters of the U.S. and California Department of Fish and Wildlife (CDFW) jurisdictional streambed was impacted by grading for the project's access driveway. The stream channel is not a County Resource Protection Ordinance (RPO) wetland. The project site is located partially within the adopted Multiple Species Conservation Program (MSCP) and partially in the Draft MSCP North County Plan area.

The project has significant impacts to 0.1 acre of coast live oak woodland (including impacts to oak root protection zone), 0.1 acre of Diegan coastal sage scrub (CSS), 4.6 acres of non-native grassland, and 0.001 acre of non-wetland waters of the U.S., and potential for impacts to nesting migratory birds or raptors if the project were to grade or clear during the breeding season. The project will mitigate for coastal sage scrub impacts within the MSCP subarea at a 2:1 ratio with Tier II habitat. Non-native grassland mitigation will be provided at a 0.5:1 ratio for impacts within both MSCP and non-MSCP, and coast live oak woodland mitigation will be provided at a 4:1 ratio. The project proposes breeding season avoidance measures in order to prevent any impact to raptors and nesting birds for any future grading or construction work. Finally, impacts to jurisdictional waters would be addressed by obtaining any required permits from the agencies with jurisdiction.

INTRODUCTION, PROJECT DESCRIPTION, LOCATION, SETTING

Project Description

The Applicant proposes to establish a non-profit horse rescue and equine therapy center on the five-acre property. The intended use would construct an approximately 10,237-square-foot non-habitable horse stable, including a tack room, veterinary area, office, laundry room, and restroom on the first floor, as well as an office and viewing deck on the second floor comprising 300 square feet. Construction of the horse stable includes a concrete slab, electrical service (200 amperes), water service, and septic system. Other uses include three horse corrals, a tread pool,

open stables, and vineyard. The project also includes a driveway providing access to Highland Valley Road through a 28-foot-wide easement that runs south from the southwest corner of the site. The site has been graded without a grading permit and currently consists of a large graded pad with graded slopes. A stable and three corrals have been constructed within the site. An access driveway has been graded and a large concrete pad, referred to as an Arizona creek crossing, has been placed over the lowest part of the road. A new headwall and 18-foot culvert extension were added to the east end of previous pre-existing culvert that occurred within the ephemeral channel. The access road is proposed to be widened to the full length of the 28-foot easement with a retaining wall to keep all road grading within the easement and minimize jurisdictional impacts. The culvert will be extended an additional six feet to the edge of the easement.

Location

The project site is located in the San Pasqual Valley area, east of Interstate 15 and south of State Route 78, in the Ramona Community Plan Area of unincorporated San Diego County (Figure 1). The project site is located in Section 4 of Township 13 South, Range 1 West of the San Pasqual U.S. Geological Survey 7.5-minute topographic quadrangle map (Figure 2). The site is located north of Highland Valley Road and east of Paseo Penasco (Figure 3). The property is bordered by rural residential homes and cultivated land.

Literature Review

Prior to conducting the biological field survey in 2016, HELIX conducted a search of the California Natural Diversity Database (CNDDB; CDFW 2017a through 2017c) for information regarding sensitive species known to occur within two miles of the project site, as well as a review of U.S. Fish and Wildlife (USFWS) and SanBIOS sensitive species databases (USFWS 2017, County 2017, respectively). Species known to occur within the same ecoregion and habitat types as the site were also considered for their potential to occur on site.

General Biological Survey

A general biological survey of the project site, off-site impact area, and a 100-foot buffer (collectively, “study area”) was conducted by HELIX biologist Stacy Nigro on October 14, 2016. Vegetation within the study area was mapped on a 1"=40' scale aerial photo. A minimum mapping unit size of 0.10 acre was used when mapping upland habitat; 0.01 acre is used when mapping wetland and riparian habitat. The study area was surveyed on foot and with the aid of binoculars. Because the site had been graded before the survey occurred, the vegetation mapping within the impact footprint relies primarily on aerial photographs taken prior to the grading, combined with direct observations of the remaining habitat existing in adjacent areas. Plant and animal species observed or otherwise detected were recorded (Attachments A and B). Special status plant and animal species with potential to occur were considered (Attachments C and D). Representative photographs of the site were taken, with select photographs included in this report as Attachment E. Animal identifications were made in the field by direct, visual observation or

indirectly by detection of calls, burrows, tracks, or scat. Plant identifications were made in the field or in the lab through comparison with photographs and reference documents. Locations of special status plant and animal species incidentally observed or otherwise detected were mapped.

Survey Limitations

Noted animal species were identified by direct observation, vocalizations, or the observance of scat, tracks, or other signs. However, the lists of species identified are not necessarily comprehensive accounts of all species that utilize the project site as species that are nocturnal, secretive, or seasonally restricted may not have been observed. The fact that the site was graded prior to the survey also limited the ability to observe plant and animal species that could have been on site prior to grading. Those species that are of special status and have potential to occur in the project site, however, are still addressed in this report (Attachments C and D).

Wetland Delineation Methods

Prior to beginning fieldwork, aerial photographs (1"=40' scale), topographic maps (1"=300' scale), and National Wetlands Inventory maps were reviewed to assist in determining the presence or absence of potential jurisdictional areas in the survey area. The wetland delineation was performed on October 14, 2016, concurrent with the general biological survey. The delineation was conducted to identify and map any water and wetland resources potentially subject to U.S. Army Corps of Engineers (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA; 33 USC 1344), RWQCB jurisdiction pursuant to Section 401 of the Clean Water Act, and streambed habitats potentially subject to CDFW jurisdiction pursuant to Sections 1600 *et seq.* of the California Fish and Game Code (CFG Code). The delineation was also conducted to determine the presence or absence of County RPO wetlands. Areas generally characterized by depressions, drainage features, and riparian and wetland vegetation were evaluated.

Waters of the U.S./State

Potential USACE-jurisdictional waters of the U.S. were delineated in accordance with the Wetlands Delineation Manual (Environmental Laboratory 1987) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008a). Mapping of drainage features was performed in the field based on the ordinary high water mark (OHWM) and surface indications of hydrology (USACE 2008b). Areas would be determined to be potential wetland waters of the U.S. if there were a dominance of hydrophytic vegetation, hydric soils, and wetland hydrology indicators. Because no areas were dominated by hydrophytic vegetation, no sampling points were taken. Areas were determined to be non-wetland waters of the U.S. if there was evidence of regular surface flow within an OHWM, but the vegetation and/or soils criterion were not met. Areas determined to be non-wetland waters of the U.S. were also determined to be RWQCB-jurisdictional waters of the State.

California Department of Fish and Wildlife Jurisdictional Streambeds

Potential CDFW-jurisdictional areas were determined based on the presence of riparian vegetation or regular surface flow. Streambeds within CDFW jurisdiction were delineated based on the definition of streambed as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports riparian vegetation" (Title 14, Section 1.72). Potential CDFW jurisdictional unvegetated-streambed encompasses the top-of-slope to top-of-slope width for the ephemeral streams within the study area. Vegetated-streambed would include all riparian shrub or tree canopy extending beyond the banks of streams within the project site.

County Resource Protection Ordinance Wetlands

Areas would be considered County wetlands if they met one of the three following attributes pursuant to the County RPO (County 2011): (1) at least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) the substratum is predominantly undrained hydric soil; or (3) an ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

Nomenclature

Nomenclature used in this report generally comes from Holland (1986) and Oberbauer (2008) for vegetation; Baldwin et al. (2012) for plants; Collins and Taggart (2006) for reptiles and amphibians; American Ornithological Society (2017) for birds; and Baker et al. (2003) for mammals. Plant species status is from the California Native Plant Society (CNPS 2017), CDFW (2017a), and County (2010a). Animal species status is from CDFW (2017b and 2017c) and County (2010a).

REGIONAL CONTEXT

The project site is generally located within the Central Valley ecoregion of central San Diego County. It occurs within the Ramona Community Planning Area. Generalized climate in the region is regarded as Mediterranean, with warm dry summers and cold moist winters. Mean annual precipitation is approximately 15 to 18 inches, and the mean annual temperature is approximately 57 degrees Fahrenheit. The frost-free season is 220 to 340 days.

Important biological resources in the region include the slopes of the San Pasqual Valley to the north of the site, in addition to perennial waters and riparian habitat associated with the San Dieguito River and Santa Ysabel Creek. The San Dieguito River connects to Lake Hodges to the southwest and to Rancho Guejito to the northeast. The northern half of the site is located within the adopted MSCP South County Subarea Plan (County 1997), while the southern half of the site is located within the Draft MSCP North County Plan (County 2009) area (Figure 4). The project

site is not designated as Pre-approved Mitigation Area (PAMA) under either the MSCP Subarea Plan or the Draft North County Plan. The nearest PAMA is located approximately 1,000 feet north of the project site, on the southern side slope of San Pasqual Valley.

Disturbance

The whole site has been disturbed in the past by human activities, which resulted in the site supporting disturbed habitat and non-native grassland. Historical aerial photographs show the site being used as an orchard from approximately 1989 to 1996, although use may have exceeded this range. After the orchard was removed, the site was apparently left fallow and may have been mowed periodically. As described above, the project site was graded in early 2015 before a stop-work order was issued by the County and the majority of the property now consists of a large graded pad and manufactured slopes; however, this report describes the site's condition prior to grading.

Topography and Soils

Elevation in the project site increases steadily from approximately 956 feet above mean sea level (amsl) in the northwest corner to 1,057 feet amsl in the southeast corner. Three soil types have been mapped in the project site (Natural Resource Conservation Service [NRCS] 2017): Arlington coarse sand, 2 to 9 percent slopes; Vista coarse sandy loam, 15 to 30 percent slopes, eroded; and Cieneba-Fallbrook rocky sandy loam, 30 to 65 percent slopes, eroded. None of the named soils mapped in the project site are listed as hydric (NRCS 2017).

HABITATS/VEGETATION COMMUNITIES

Five vegetation communities/habitat types occurred on the project site and off-site impact area prior to grading, as presented in Table 1 and shown on Figure 5. The numeric codes in parentheses following each community/habitat type name are from the Holland classification system (Holland 1986), and as added to by Oberbauer (2008), as presented in the County's Biology Guidelines (County 2010a).

Table 1 VEGETATION COMMUNITIES/HABITAT TYPES (acres)			
VEGETATION COMMUNITY/ HABITAT TYPE (Holland Code)	**EXISTING ON SITE**	**OFF-SITE IMPACT AREA**	**TOTAL**
South County MSCP			
Diegan Coastal Sage Scrub (32500)	0.1	--	0.1
Non-native Grassland (42200)	2.9	--	2.9
Disturbed Habitat (11300)	0.3	--	0.3
Subtotal	3.3	--	3.3
Draft North County MSCP			
Coast Live Oak Woodland (71160)	--	0.1	0.1
Diegan Coastal Sage Scrub (32500)	<0.1	--	<0.1
Non-native Grassland (42200)	1.6	0.1	1.7
Disturbed Habitat (11300)	0.2	<0.1	0.3
Urban/Developed (12000)		<0.1	<0.1
Orchard (18100)	--	<0.1	<0.1
Subtotal	1.8	0.3	2.1
TOTAL	**5.1**	**0.3**	**5.4**

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present human or animal usage that removes any capability of providing viable habitat. Disturbed habitat occurs along the western and southern boundary and is characterized by Mexican fan palm (*Washingtonia robusta*), castor bean (*Ricinus communis*), and eucalyptus (*Eucalyptus* sp.). Disturbed habitat covered approximately 0.5 acre of the site and off-site impact area.

Orchards and Vineyards

The surrounding land is characterized by active agriculture of avocado groves (*Persea americana*) and grape vineyards (*Vitus* sp.). Orchards and vineyards occur within the 100-foot buffer on the northern, eastern, and southern boundary of the study area. Less than 0.1 acre is included in the off-site impact area.

Diegan Coastal Sage Scrub

Diegan coastal sage scrub may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within Diegan coastal sage scrub include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum* ssp.

fasciculatum), laurel sumac (*Malosma laurina)*, and black sage (*Salvia mellifera*). Diegan coastal sage scrub occurs along the eastern boundary and is characterized by California sage brush, California buckwheat, and laurel sumac. Diegan coastal sage scrub covered approximately 0.1 acre of the site.

Non-native Grassland

Non-native grassland is a mixture of annual grasses and broad-leaved, herbaceous species. Annual species comprise from 50 percent to more than 90 percent of the vegetative cover, and most annuals are non-native species. Non-native grasses typically comprise at least 30 percent of the vegetative cover, although this percentage can be much higher in some years and lower in others, depending on land use and climatic conditions. Usually, the grasses are less than three feet in height and form a continuous or open cover. Emergent shrubs and trees may be present but do not make up more than 15 percent of the total cover (County 2010b). Most of the non-native grasses originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. Non-native grassland was the dominant habitat on site prior to grading, covering approximately 4.5 acres on site and 0.1 acre in the off-site impact area. It is characterized by Russian thistle (*Salsola tragus*), oats (*Avena* sp.), and ripgut grass (*Bromus diandrus*).

Coast Live Oak Woodland

Coast live oak woodland is an open to dense evergreen woodland or forest community, dominated by coast live oak (*Quercus agrifolia*) that may reach a height of 35 to 80 feet. The shrub layer consists of toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), spreading snowberry (*Symphoricarpos mollis*), fuchsia-flowered gooseberry (*Ribes speciosum*), and poison oak (*Toxicodendron diversilobum*). A dense herbaceous understory is dominated by miner's lettuce (*Claytonia perfoliata* var. *perfoliata*) and chickweed (*Stellaria media*). This community occurs along the coastal foothills of the Peninsular Ranges, typically, on north-facing slopes and shaded ravines (Holland 1986). This vegetation community is located at the south western edge of the study site and is characterized by coast live oak, holly-leaved cherry (*Prunus ilicifolia* ssp. *ilicifolia*), and horseweed (*Erigeron canadensis*). A 50-foot oak root protection zone is mapped surrounding the drip line of the coast live oak woodland on Figure 5. Coast live oak woodland and oak root protection zone covered 0.1 acre within the off-site impact area.

Flora

HELIX identified a total of 26 plant species in the project site, of which 12 (46 percent) are non-native species (Attachment A).

Fauna

A total of 15 animal species were observed or otherwise detected in the project site during the biological survey, including one invertebrate, three reptile, nine bird, and two mammal species (Attachment B).

Sensitive Vegetation Communities/Habitat Types

Sensitive vegetation communities/habitat types are defined as land that supports unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants as defined by Section 15380 of the State CEQA Guidelines. Coast live oak woodland, Diegan coastal sage scrub, and non-native grassland are the sensitive vegetation communities/habitat types present in significant quantities on the project site and impact area.

SPECIAL STATUS SPECIES

Special Status Plant Species

Special status plant species have been afforded special status and/or recognition by the USFWS, CDFW, and/or the County and may also be included in the CNPS' Inventory of Rare and Endangered Plants. Their status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread but exist naturally in small populations.

No special status plant species were observed on the project site, nor are any considered to have a high potential to occur within the project site (Attachment C).

Special Status Animal Species

Special status animal species include those that have been afforded special status and/or recognition by the USFWS, CDFW, and/or the County. In general, the principal reason an individual taxon (species or subspecies) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Two County sensitive animal species were observed near the site: Belding's orange-throated whiptail and turkey vulture.

Belding's orange-throated whiptail (*Aspidoscelis hyperythrus beldingi*)
Status: --/SSC, MSCP Covered, County Group 2
Distribution: Southern Orange County and southern San Bernardino County, south through Baja California
Habitat(s): Coastal sage scrub, chaparral, edges of riparian woodlands, and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open,

sunny areas, shaded areas, and abundant insect prey base, particularly termites (*Reticulitermes* sp.).
Status on site: Observed in the Diegan coastal sage scrub adjacent to the project site on the east side. Presumed (high potential) to have used the project site too.

Turkey vulture (*Cathartes aura*)
Status: --/--; County Group 1
Distribution: Observed throughout San Diego County with the exception of extreme coastal San Diego where development is heaviest
Habitat(s): Foraging habitat includes most open habitats with breeding occurring in crevices among boulders
Status on site: Observed soaring to the west of the site, outside of the 100-foot buffer. Has potential to fly over the site, but no suitable nesting habitat occurs on site for this species.

Besides the species listed above, red diamond rattlesnake (State Species of Special Concern, County Group 2) is the only other sensitive species with a high potential to occur on site (Attachment D).

The federally threatened coastal California gnatcatcher (*Polioptila californica californica*) has a moderate potential to occur on site because it has been observed within half a mile of the site and the adjacent area supports a small portion of Diegan coastal sage scrub. The coastal California gnatcatcher might use the adjacent site for dispersal but would be unlikely to nest on site or in the adjacent sage scrub because of its small size of about two acres, surrounded by agricultural and residential development.

The potential for Stephens' kangaroo rat (*Dipodomys stephensi*) was also assessed, although it was not included in Attachment D because there are no recorded observations of Stephens' kangaroo rat within 2 miles of the project site. Stephens' kangaroo rat is not known to occur within the Central Valley ecoregion, where the project site is located. The nearest observation of Stephens' kangaroo rat is about 3.5 miles southeast of the site in the Ramona Grasslands, separated from the project site by significant topographic relief and multiple roads, homes, and agricultural operations that are not suitable for Stephens' kangaroo rat usage or movement. The Stephens' kangaroo rat occurs in large, wide open grasslands like the Ramona Grasslands and Rancho Guejito, but would not be expected to occur on the project site, a relatively small area of ruderal grasses and weeds that grew up from a fallowed orchard that was periodically mowed or disked for fire suppression purposes, surrounded by active agricultural and residential uses. Therefore, the habitat on site is not suitable for Stephens' kangaroo rat and it is not expected to occur on site.

Nesting Birds

The Diegan coastal sage scrub found in the eastern boundary could have provided suitable nesting habitat for migratory birds or raptors.

Raptor Foraging

The County (2010a) defines raptor foraging habitat as, "Land that is a minimum of five acres (not limited to project boundaries) of fallow or open areas with any evidence of foraging potential (i.e., burrows, raptor nests, etc.)." Although the site itself does not support five acres of non-native grassland, when adjacent off-site areas are taken into account the site could have provided foraging habitat for raptors. One turkey vulture was observed soaring off site, and other raptors could fly over the site, and the site may have provided limited foraging potential in its pre-graded condition.

JURISDICTIONAL WETLANDS AND WATERWAYS

Jurisdictional Waters

A short section of an ephemeral stream channel traverses through the road easement to the south of the site (Figure 5). The channel is approximately two feet wide on average. The channel is part of a feature that begins just upstream as runoff directed from Highland Valley Road and potentially from neighboring properties. This area appears to have originated because of construction of the roadway and associated runoff. The channel appears to connect to potentially jurisdictional waters further downstream. This channel flowed into a previously existing culvert inlet that was extended to the east to allow for grading of the driveway. The culvert location shown on Figures 5 and 6 is the location prior to the grading of the driveway. Because no hydrophytic vegetation is present, the channel does not support wetland conditions and, therefore, would not be considered a wetland under USACE jurisdiction. However, the jurisdictional delineation indicates the channel is a non-wetland waters of the U.S. under USACE jurisdiction. Because the channel qualifies as waters of the U.S., the channel also qualifies as waters of the State subject to the regulatory jurisdiction of the RWQCB pursuant to CWA Section 401.

The channel falls under CDFW jurisdiction based on the definition of streambed as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports riparian vegetation" (Title 14, Section 1.72). Potential CDFW-jurisdictional, unvegetated streambed encompasses the top-of-slope to top-of-slope width for the ditch, which is the same two-foot width as it is for USACE.

Non-Jurisdictional Waters

The plastic-lined drainage that runs along the northwestern edge of the project site appears to originate just up the hill as erosion resulting from a dirt road and the surrounding orchards and vineyards, and then was cut parallel to the dirt road to keep it going west. It does appear to connect to likely jurisdictional waters further downstream, but is not considered jurisdictional because it is man-made, and falls into the category of "ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow

of water" that are not considered waters of the U.S. according to the Revised Guidance on CWA Jurisdiction Following the Supreme Court Decision in Rapanos v. U.S. and Carabell v. U.S. (USACE 2008c). Finally, the other features on site appear to be from erosion and not connected to any potential waters downstream, and thus were not considered jurisdictional.

Resource Protection Ordinance Wetlands

There are no areas within the project site in its pre-graded condition that meet the criteria to be considered County RPO wetlands (County 2011). The RPO defines wetlands as lands having one or more of the following attributes: (1) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) The substratum is predominantly undrained hydric soil; or (3) An ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system. As stated above, the jurisdictional channel does not support a predominance of hydrophytes, nor is it a stream with a predominately non-soil substrate. It is a narrow, ephemeral channel which only conveys runoff during or shortly after significant rain events. This ephemeral hydrologic regime is insufficient to result in the formation of hydric soils. Furthermore, the soil at the bottom of the channel appeared consistent with the surrounding topsoil; therefore, for the reasons previously stated, it was concluded that the substrate is not predominately hydric soil. None of the three criteria are met and the ephemeral drainage channel is not an RPO wetland.

OTHER UNIQUE FEATURES/RESOURCES

Habitat Connectivity and Wildlife Corridors

Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A corridor is a specific route that is used for the movement and migration of species, and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stone linkages that are made up of a fragmented archipelago arrangement of habitat over a linear distance.

The project site is surrounded by rural residential development and cultivated land and does not occur within any known corridors or linkages. The closest potential east-west corridor would be the San Pasqual Valley, to the north of the site. The closest potential north-south movement area would likely be to the east where Highland Valley Road turns to the south.

Topography, setting, soils, and raptor foraging are discussed elsewhere in this report. The project site does not include any hill-topping habitat or known roost sites. There are some rock outcroppings in the southern part of the site, most of which were left in place during project grading.

SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

Applicable Regulations

Biological resources in the project site are subject to regulatory review by federal, state, and local agencies. Under CEQA, impacts associated with a proposed project or program are assessed with regard to significance criteria determined by the CEQA Lead Agency (in this case, the County) pursuant to CEQA Guidelines. Biological resources-related laws and regulations that apply to the proposed project include Migratory Bird Treaty Act (MBTA), CEQA, State Porter-Cologne Water Quality Control Act, and CFG Code.

The County is the lead agency for the CEQA environmental review process in accordance with state law and local ordinances. During CEQA review, the County will be responsible for reviewing project issues per the Guidelines for Determining Significance for Biological Resources (County 2010a) and RPO. The USACE is responsible for reviewing issues related to waters of the U.S. The RWQCB is responsible for reviewing issues related to waters of the State pursuant to the CWA. The State Porter-Cologne Water Quality Control Act would not apply as there are no isolated waters of the State in the study area. The CDFW is responsible for reviewing issues related to riparian habitat and streambeds, nesting birds, and raptors pursuant to CFG Code.

Federal Government

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season (generally February 1 to August 31). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

Federal wetland regulation in non-tidal (non-marine) settings is guided by the CWA. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. Permitting for projects filling waters of the U.S. is overseen by the USACE

under Section 404 of the CWA. Most development projects are permitted using Individual Permit or Nationwide Permit instruments.

State of California

California Environmental Quality Act

Primary environmental legislation in California is found in CEQA and its implementing guidelines (State CEQA Guidelines), which require that projects with potential adverse effects (or impacts) on the environment undergo environmental review. Adverse environmental impacts are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Section 1600 of CFG Code requires a Streambed Alteration Agreement (SAA) for any activity that would alter the flow, change, or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake. Typical activities that require an SAA include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. Notification is required prior to any such activities.

Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

County of San Diego

Resource Protection Ordinance

The County regulates sensitive biological habitats (among other resources) via the RPO (County 2011), the regulations of which cover wetlands, wetland buffers, and sensitive habitat lands. No wetlands or wetland buffers were present in the project site, as discussed above.

Sensitive Habitat Lands are defined by the RPO as:

- Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State CEQA Guidelines (14 Cal. Admin. Code Section 15000 *et seq*.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.

    - "Unique vegetation community" refers to associations of plant species which are rare or substantially depleted. These may contain rare or endangered species, but other species may be included because they are unusual or limited due to a number of factors, for example: (a) they are only found in the San Diego region; (b) they are a local representative of a species or association of species not generally found in San Diego County; or (c) they are outstanding examples of the community type as identified by the CDFW listing of community associations.

No portions of the project site would qualify as Sensitive Habitat Lands.

Analysis of Project Effects

The following analysis of project effects is based on a review of habitat types and sensitive species likely to have occurred on site prior to grading of the site. This section also addresses any future construction or grading that may be required to implement the final approved grading plan.

Issue 1 – Special Status Species

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

Effects Found Not to be Significant

The project would not result in significant impacts under the following guidelines:

A. The project would not impact one or more individuals of a species listed as federally or state endangered or threatened.

No federally or state endangered or threatened species are known to occur or had a high potential to occur within the project site in its pre-graded condition (Attachments C and D). The federally threatened coastal California gnatcatcher has a moderate potential to forage within appropriate nearby habitat or disperse across the site, but is not expected to breed on site because the coastal sage scrub on site was only 0.1 acre on the edge with non-native grassland. In addition, the coastal sage scrub on the adjacent property is approximately two

acres in size, which is very small for a breeding territory. Therefore, although the project impacted a small amount of potential habitat for the coastal California gnatcatcher, the project was not likely to have had a direct adverse effect on the species.

C. The project would not impact the local long-term survival of a County List C or D plant species or a County Group 2 animal species.

No County List C or D plant species are known or expected to occur within the project site in its pre-graded condition, but two County Group 2 animal species, Belding's orange-throated whiptail and red diamond rattlesnake, had high potential to use the site prior to grading. Both species are known to occur in the local area, and have habitat located within PAMA, such that the project's impacts to potential habitat will not impact their local long-term survival. Impacts are less than significant.

D. The project would not impact arroyo toad aestivation, foraging, or breeding habitat.

No arroyo toad aestivation, foraging, or breeding habitat occurs on the site or would have been expected to occur on site in its pre-graded condition. Although arroyo toads have been observed within two miles of the site, they occurred in a different drainage and the development and agriculture around the project site make dispersal unlikely.

E. The project would not impact golden eagle habitat.

There are several golden eagle observations reported within approximately two miles of the site; however, HELIX is not aware of any golden eagle nests within 4,000 feet of the site. Looking at preliminary biotelemetry data (Tracey et al. 2016), the site does not appear to be a primary foraging area for any of the tracked eagles. The project site does not contain any cliffs for nesting habitat. The small size of the non-native grassland on site and the developed surroundings would indicate that the site has low value for golden eagle. New nesting in the vicinity is not expected. Therefore, no impacts would occur to golden eagle or its habitat.

G. The project would not impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or supports multiple wildlife species.

The project site is not located within a large block of habitat and does not support multiple or sensitive wildlife species. As such, the project would not impact the viability of a future core wildlife area.

H. The project would not cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term.

The site is not located adjacent to existing open space. The site is surrounded by rural residential development and cultivated land. Edge effects from human access, domestic animals, exotic pest species, operational noise, and lighting already affect the project site and adjacent habitat, and would not noticeably increase with the proposed project. The project will follow County regulations for noise and lighting. Therefore, no significant indirect impacts to sensitive species would occur over the long term.

I. The project would not impact occupied burrowing owl habitat.

The project is not located within predicted burrowing owl habitat according to the Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County (County 2010b Appendix A). No owls or burrows were observed or would be expected to occur within the project site in its pre-graded condition. The site is not considered occupied burrowing owl habitat, and no impact to occupied burrowing owl habitat would occur.

J. The project would not impact occupied cactus wren habitat, or formerly occupied coastal cactus wren habitat that has been burned by wildfire.

The project does not support occupied cactus wren habitat. Based on the species remaining on site after grading, species composition in the adjacent habitat, and review of aerial photographs, the site in its pre-graded condition lacked cholla or prickly pear cacti for nesting. Therefore, no impact to cactus wren habitat would occur.

K. The project would not impact occupied Hermes copper butterfly habitat.

The project did not support occupied Hermes copper butterfly habitat in its pre-graded condition. There are no recorded Hermes copper butterfly observations within five miles and based on the species remaining on site after grading, species composition in the adjacent habitat, and review of aerial photographs, no spiny redberry, its host plant, occurred on site in the pre-graded condition. No impact to Hermes copper butterfly habitat would occur.

Effects Found to be Potentially Significant

The project could result in significant impacts under the following guidelines:

B. The project would impact an on-site population of a County List A or B plant species, or a County Group 1 animal species, or a species listed as a state Species of Special Concern.

No County List A or B plant species are known or expected to occur on site in its pre-graded condition. A turkey vulture (Group 1 animal species) was observed flying west of the site and has high potential for fly-over, but on-site impacts to turkey vulture are not considered significant since the turkey vulture does not nest or roost on site. No other Group 1 animal species are known or expected to occur on site. There are two state Species of Special Concern with a high potential to occur on site: Belding's orange-throated whiptail was observed in adjacent habitat to the site and has high potential to occur on site, and red diamond rattlesnake also has high potential to use the site. Both of these species are listed by the County as Group 2 species. The project could impact habitat for Belding's orange-throated whiptail and red diamond rattlesnake.

F. The project would result in a significant loss of functional foraging habitat for raptors.

The project would impact 4.6 acres of non-native grassland, which could have served as raptor foraging habitat. Impacts to raptor foraging habitat would be significant.

L. The project could impact nesting success of tree-nesting raptors through grading, clearing, fire fuel modification, and/or other noise generating activities such as construction.

Project construction could impact the nesting success of tree-nesting raptors, which have the potential to nest in the immediate vicinity of construction impact areas. Noise from such sources as clearing, grading, and blasting could result in an impact to wildlife. Noise-related impacts would be considered significant if sensitive species (such as raptors) were displaced from their nests and failed to breed. Raptors or other sensitive bird species nesting within any area impacted by noise exceeding 60 decibels (dB) or ambient could be significantly impacted. If tree-nesting raptors were nesting within 500 feet of the impact area, effects resulting from construction noise would be potentially significant.

Proposed Mitigation Measures

BIO-1 Impacts to 0.1 acre of coast live oak woodland within the Draft North County MSCP would be mitigated at a 4:1 ratio, with 0.4 acre of mitigation. Mitigation for impacts to coast live oak woodland can be accomplished through purchase of 0.4 acre of oak woodland, oak forest, or oak riparian forest within an approved off-site mitigation area in San Diego County, in the Central Valley ecological subregion. If off-site mitigation in the Central Valley is not available then mitigation will be obtained in an adjacent ecoregion. The County has approved

use of the Red Mountain Mitigation Bank for coast live oak woodland mitigation under this condition.

BIO-2 Impacts to 0.1 acre of Diegan coastal sage scrub within the South County MSCP would be mitigated at a 2:1 ratio for a total of 0.2 acre of mitigation. Mitigation for impacts to Diegan coastal sage scrub can be accomplished through purchase of 0.2 acre of Tier II or better habitat within an approved off-site mitigation bank, PAMA, or Biological Resource Core Area (BRCA) within the South County MSCP.

BIO-3 Impacts to 2.9 acres of non-native grassland within the South County MSCP would be mitigated at a 0.5:1 ratio, with 1.5 acres of mitigation. Mitigation for impacts to non-native grassland can be accomplished through purchase of 1.5 acres of Tier III or better habitat within an approved off-site mitigation bank, PAMA, or BRCA within the South County MSCP.

BIO-4 Impacts to 1.7 acres of non-native grassland within the Draft North County MSCP would be mitigated at a 0.5:1 ratio, with 0.9 acre of mitigation. Mitigation for impacts to non-native grassland can be accomplished through purchase of 0.9 acre of non-native grassland within an approved off-site mitigation area in San Diego County, in the Central Valley ecological subregion. If off-site mitigation in the Central Valley is not available then mitigation will be obtained in an adjacent ecoregion. The County has approved use of the Brook Forest Mitigation Bank for non-native grassland mitigation under this condition.

BIO-5 No future grading or clearing shall occur during the raptor and migratory bird breeding season (January 15 – August 31). All grading permits, improvement plans, and the Site Plan shall state the same. If future clearing or grading would occur during the breeding season, a pre-construction survey shall be conducted within seven days prior to starting work to determine whether breeding birds occur in or within 500 feet of the impact area(s). If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, clearing, grubbing, and grading shall be allowed to proceed. If active nests or nesting birds are observed within the area, the biologist shall flag the active nests and construction activities shall avoid active nests until nesting behavior has ceased, nests have failed, or young have fledged. Construction near an active nest (within 300 feet for passerines, 500 feet for raptors, or as otherwise determined by a qualified biologist) shall either: (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA or ambient, as confirmed by a County-approved noise specialist. Intermittent monitoring by a qualified biologist would be required for construction near an active nest.

Conclusions

Project implementation could result in significant impacts to coast live oak woodland, Diegan coastal sage scrub, and non-native grassland that could potentially support sensitive species. Implementation of mitigation measures **BIO-1** through **BIO-4** would reduce impacts to potential state Species of Special Concern habitat under guideline B to less than significant. Implementation of mitigation measures **BIO-3** and **BIO-4** would reduce impacts to raptor foraging habitat under guideline F to less than significant. Future construction activities could also result in significant impacts to raptors and birds with the potential to nest and/or forage over the site and immediate vicinity. Potential significant impacts could result from direct disturbance and noise. Implementation of mitigation measure **BIO-5** would reduce impacts under guideline L to less than significant.

Issue 2 – Riparian Habitat and Sensitive Natural Communities

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the USFWS or CDFW?

Effects Found Not to be Significant

The project would not result in significant impacts under the following guidelines:

C. The project would not draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of three feet or more from historical low groundwater levels.

There is no groundwater-dependent habitat on site. In addition, no groundwater withdrawals or activities that could result in lowering of the groundwater table are proposed. No significant impact would occur.

D. The project would not cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive habitats over the long term.

The site is not located adjacent to existing or planned open space easements, and is surrounded by rural residential and agricultural use. Edge effects from human access and invasive plant species already affect the project site and adjacent habitat, and would not noticeably increase with the proposed project. The project will follow County regulations for landscaping, irrigation, and storm water management. Therefore, no significant indirect impacts to sensitive habitats would occur over the long term.

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

No RPO wetlands exist on site; therefore, no buffer is required and there would be no significant impact related to wetland buffers.

Effects Found to be Potentially Significant

A. Project-related grading, clearing, construction, or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5 in the County Guidelines for Determining Significance [County 2010b], excluding those without a mitigation ratio) on or off the project site.

Diegan coastal sage scrub, non-native grassland, and coast live oak woodland are sensitive habitat types that occurred on site prior to grading. The project would impact 0.1 acre of coast live oak woodland, 0.1 acre of Diegan coastal sage scrub and 4.6 acres of non-native grassland (Figure 6). Because the impacts occurred before a permit was obtained, the USFWS and CDFW requested additional mitigation for temporal loss of habitat. The applicant has agreed to provide an extra 1:1 mitigation for impacts to Diegan coastal sage scrub and coast live oak woodland, resulting in mitigation ratios of 2:1 for coastal sage scrub and 4:1 for coast live oak woodland. Additional mitigation is being provided for these habitat types because they are the most sensitive habitat types impacted by the project, and they are slow-growing habitat types that take longer to establish when planted as mitigation. No additional mitigation is proposed for non-native grassland beyond the required 0.5:1 ratio, given that it is a less sensitive, quick-growing habitat and given the history of agricultural use and disturbance on site for many years. These mitigation ratios require a combined total of 3.0 acres of mitigation (Table 2). The remaining habitats–orchard, disturbed habitat, and urban/developed land–are not sensitive and do not require mitigation.

Table 2
VEGETATION COMMUNITIES/HABITAT TYPES (acres)

VEGETATION COMMUNITY/ HABITAT TYPE (Holland Code)	EXISTING ON SITE	ON-SITE IMPACTS	OFF-SITE IMPACTS	TOTAL IMPACTS	MITIGATION RATIO	MITIGATION
South County MSCP						
Diegan Coastal Sage Scrub (32500)	0.1	0.1	--	0.1	2:1*	0.2
Non-native Grassland (42200)	2.9	2.9	--	2.9	0.5:1	1.5
Disturbed Habitat (11300)	0.3	0.3	--	0.3	--	--
Subtotal	3.3	3.3	--	3.3		1.7
Draft North County MSCP						
Coast Live Oak Woodland (71160)	--	--	0.1†	0.1†	4:1*	0.4
Diegan Coastal Sage Scrub (32500)	<0.1	<0.1	--	<0.1	N/A	--
Non-native Grassland (42200)	1.6	1.6	0.1	1.7	0.5:1	0.9
Disturbed Habitat (11300)	0.2	0.2	<0.1	0.3	--	--
Urban/Developed (12000)			<0.1	<0.1	--	--
Orchard (18100)	--	--	<0.1	<0.1	--	--
Subtotal	1.8	1.8	0.3	2.1		1.3
TOTAL	**5.1**	**5.1**	**0.3**	**5.4**		**3.0**

*Mitigation ratio includes an additional 1:1 to mitigate for temporal loss.
†Includes impacts to the 50-foot oak root protection zone.

B. The following would occur to or within jurisdictional wetlands and/or riparian habitats as defined by the USACE, CDFW, and County: vegetation removal; grading; diversion of water flow; placement of fill; placement of structures; road crossing construction; placement of culverts; disturbance of the substratum; and activities that may cause an adverse change in native species composition, diversity, and abundance.

No riparian habitat or wetlands are present or were present in the pre-graded conditions within the project site; however, the ephemeral stream channel that crosses the access easement south of the project site is a non-wetland waters of the U.S., waters of the State under RWQCB jurisdiction, and unvegetated streambed under the jurisdiction of the CDFW. The grading for the access road will impact 24 linear feet of two-foot-wide streambed, for a total impact of 48 square feet (0.001 acre).

Proposed Mitigation Measures

Impacts to sensitive habitats would be reduced to less than significant through implementation of mitigation measures **BIO-1** through **BIO-4**.

BIO-6 In order to comply with applicable laws, the project shall notify and obtain all necessary permits from the appropriate state and federal agencies prior to issuance of a grading permit. USACE regulatory staff confirmed that the project qualifies for a non-notifying Section 404 Nationwide Permit 14, Linear Transportation Projects, and does not require notification to the USACE. The project requires CWA Section 401 Water Quality Certification from the RWQCB. The project would also require CFG Code Section 1602 SAA notification to the CDFW. The CDFW declined to act on the notification, meaning that the impacts are approved by default. Mitigation requirements will be set by the RWQCB.

Conclusion

Project implementation would result in significant impacts on sensitive natural communities. Impacts would be mitigated through mitigation measures **BIO-1** through **BIO-4**. Impacts to jurisdictional waters will be mitigated by mitigation measure **BIO-6**.

Issue 3 – Jurisdictional Wetlands and Waterways

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Effects Found Not to be Significant

No wetland waters of the U.S. are present on site, and the project would not result in impacts to wetland waters of the U.S. subject to the regulatory jurisdiction of the USACE pursuant to

Section 404 of the CWA. The project will impact a small amount of non-wetland waters of the U.S., as discussed above.

Proposed Mitigation Measures

No mitigation is required under this guideline. Impacts to non-wetland waters will be mitigated by **BIO-6**.

Conclusion

Project implementation would not result in significant impacts to federally protected wetlands. Impacts to non-wetland waters will be mitigated by **BIO-6**.

Issue 4 – Wildlife Movement and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Effects Found Not to be Significant

A. The project would not impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

The project would not impede wildlife access to on- or off-site areas that may be used for foraging, breeding, and/or obtaining water or access to areas necessary for reproduction. The site is not located within a wildlife corridor or movement area and does not support significant foraging or breeding habitat. The area does not support critical populations of animal species or known nursery sites. Impacts would be less than significant.

B. The project would not substantially interfere with connectivity between blocks of habitat and would not potentially block or substantially interfere with a local or regional wildlife corridor or linkage.

The project is not located between blocks of habitat and would not substantially interfere with connectivity between blocks of habitat. The site is not located within a local or regional wildlife corridor or linkage and would not potentially block or substantially interfere with a local or regional wildlife corridor or linkage. Impacts would be less than significant.

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

The project does not create any wildlife corridors. Impacts would be less than significant.

D. The project would not increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.

The project is not located in a known wildlife corridor or linkage; however, all lighting would comply with the County Light Pollution Code to minimize light spill outside of the project site. Noise must also meet County standards at the property lines. No significant impact to wildlife corridors or linkages resulting from lighting or noise would occur.

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

The project site is not located in an existing wildlife corridor or linkage and would not further constrain an already narrow corridor. No significant impact to wildlife corridors or linkages would occur.

F. The project maintains adequate visual continuity (i.e., long lines-of-site) within wildlife corridors and linkage.

The project site is not located in a wildlife corridor or linkage. Impacts would be less than significant.

Effects Found to be Potentially Significant

The project would not result in significant impacts on wildlife movement and nursery sites.

Proposed Mitigation Measures

No mitigation is required.

Conclusion

Project implementation would not result in significant impacts on wildlife movement and nursery sites. No mitigation is required.

Issue 5 – Local Policies, Ordinances, and Adopted Plans

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Would the project conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?

Effects Found Not to be Significant

A. The project would not impact Diegan coastal sage scrub vegetation outside of the MSCP in excess of the County's 5 percent habitat loss threshold, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.

The 0.1 acre of Diegan coastal sage scrub impacted by the project is located inside of the MSCP. There is a less than 0.01 acre area of Diegan coastal sage scrub within the southeastern corner of the project site that falls outside of the adopted MSCP; however, the acreage of that area within the project site rounds down to 0.0 acre and does not meet the minimum 0.1-acre mapping standard for upland habitats, so it is not a measurable impact according to the County's Report Format and Content Requirements (County 2010b). In addition, the Diegan coastal sage scrub in that location occurred in a narrow strip between non-native grassland and vineyards, right along a dirt road, so it would be considered a remnant pocket of habitat that was already impacted by edge effects and had limited biological value. Therefore, there is not a significant impact to Diegan coastal sage scrub outside of the MSCP. No impact would occur and no Habitat Loss Permit (HLP) or HLP Exemption would be required.

B. The project would not preclude or prevent the preparation of the subregional NCCP. For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.

The project would not occur within areas identified as PAMA under the Draft MSCP North County Plan, and project implementation would not preclude or prevent finalization and adoption of this Plan. No significant impact would occur.

C. The project would not impact wetlands outlined in the RPO.

No RPO wetlands were present on site prior to grading. No impact to RPO wetlands would occur.

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

The project does not impact a significant acreage of coastal sage scrub outside of the adopted MSCP, and, therefore, the NCCP Guidelines do not apply. No impact would occur.

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

No adopted HCP, RMP, Special Area Management Plan, Watershed Plan, or other regional planning efforts besides the MSCP and Draft North County Plan are applicable to the project. As such, the project would not conflict with any adopted plans. No impact would occur.

F. For lands within the MSCP, the project would not minimize impacts to Biological Resource Core Area, as defined in the Biological Mitigation Ordinance (BMO).

The site is not located within a BRCA, as defined by the BMO. No impact would occur.

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

The project would not preclude connectivity between high habitat value areas. The project site and most of the surrounding area is ranked as Intensive Agriculture by the County's Habitat Evaluation Model. No dense patches of coastal sage scrub occur near the project site. No impact would occur.

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

The project site does not support existing movement corridors and is not located within a habitat linkage as defined by the BMO. No impact would occur.

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

The project site and impact area in pre-graded conditions did not support MSCP narrow endemic species. No impact would occur.

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

No state or federally listed species had a high potential to occur within the project site prior to grading. The site is surrounded by rural residential and agricultural development. No impact would occur.

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

There are several golden eagle observations reported within approximately two miles of the site. However, the project site does not contain any cliffs for nesting habitat and the small size of the non-native grassland on site and the developed surroundings would indicate that the site had low value for golden eagle. New nesting in the vicinity is not expected. Therefore, the project would not result in the take of eagles, eagle eggs, or any part of an eagle. No impact would occur.

Effects Found to be Potentially Significant

The project could result in significant impacts under the following guidelines:

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

Future project construction during the avian breeding season could potentially result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs protected under the MBTA. These impacts would be significant.

Proposed Mitigation Measures

The project would implement breeding season avoidance for migratory birds and raptors per mitigation measure **BIO-5**.

Conclusion

Future project construction during the breeding season could result in significant impacts to migratory birds and the destruction of active migratory bird nests and/or eggs. Implementation of mitigation measure **BIO-5** would reduce impacts to less than significant.

CUMULATIVE IMPACTS

A list of projects within a two-mile radius of the site was provided by the County. All Major Use Permits, Tentative Maps, and Tentative Parcel Maps on the list were researched using the County's online documents library. Projects that were determined to have an impact to biological resources are listed in Table 3 below and shown on Figure 7. A two-mile radius was selected as the cumulative study area for biology because it provides good representation of adjacent habitat types and major landforms that surround the site, including the San Pasqual Valley to the north, north-south movement corridors to the east and west of the site, and rocky hills south of the site. Based on this project's limited impacts and location within rural residential/agricultural development, projects more than two miles from the site would not have impacts relevant to the project.

Table 3
CUMULATIVE PROJECTS AND IMPACTS (acres)

PROJECT NAME AND NUMBER	IMPACTS				
	Oak Woodland	Non-Native Grassland	Coastal Sage Scrub	Nesting Birds	Wetlands/ Waters
Geographical Ventures PRD, TM 4808	--	--	--	--	0.55*
Sgobassi TPM, TPM 20466	--	--	11.68	Yes (coastal California gnatcatcher)	--
Fenton Ranch, TM 4979 and TPM 20299	--	--	0.85	--	--
Smith TPM, TPM 20276	--	--	2.0	--	--
Mesecher TPM, TPM 20574	--	--	--	Yes (coastal sage scrub off site)	--
Subtotal	*0*	*0*	*14.53*	*Yes*	
ResQue Ranch, LDGRMJ-30067	0.1	4.6	0.1	Yes	0.001
TOTAL	**0.1**	**4.6**	**14.63**	**Yes**	**0.551**

*Riparian woodland - County documents do not state how much if any of this area was Waters of the U.S./State or CDFW jurisdictional.

As shown in Table 3, the ResQue Ranch project is the only project in the cumulative study area with identified impacts to oak woodland or non-native grassland, thus, there is no cumulative impact beyond the project's direct impact acreage of 0.1 acre of coast live oak woodland and 4.6 acres of non-native grassland. The project's coastal sage scrub impact is less than one percent of the cumulative coastal sage scrub impact of 14.63 acres, and, thus, the project's contribution is less than cumulatively considerable. Two of the other projects had identified potential impacts to nesting birds, but those projects were conditioned with breeding season avoidance and all projects must comply with the MBTA; therefore, there will not be a cumulative impact to nesting birds. Finally, the projects within the cumulative study area combined impacted less than one acre of wetlands or waters, and the project's impact to 0.001 acre of non-wetland ephemeral drainage is not cumulatively considerable.

The project is located partially within the adopted MSCP and partly within the North County Plan area, and is consistent with both plans, thus, it has no cumulative impacts related to habitat plan consistency. The project will mitigate for habitat impacts at the ratios specified by the BMO

(for MSCP impacts) and the County Guidelines of Significance (for North County Plan area impacts), both of which were planned to provide adequate mitigation on a direct and cumulative basis, ensuring that significant cumulative impacts to non-native grassland and coastal sage scrub will not occur.

I certify that the information in this report and enclosures are correct and accurately represent my work. Please do not hesitate to contact Beth Ehsan at (619) 462-1515 or me at (760) 517-9054 if you have any questions or require further assistance.

Sincerely,

Stacy Nigro
County-Approved Biological Consultant

Beth Ehsan[1]
Biology Project Manager

Enclosures:

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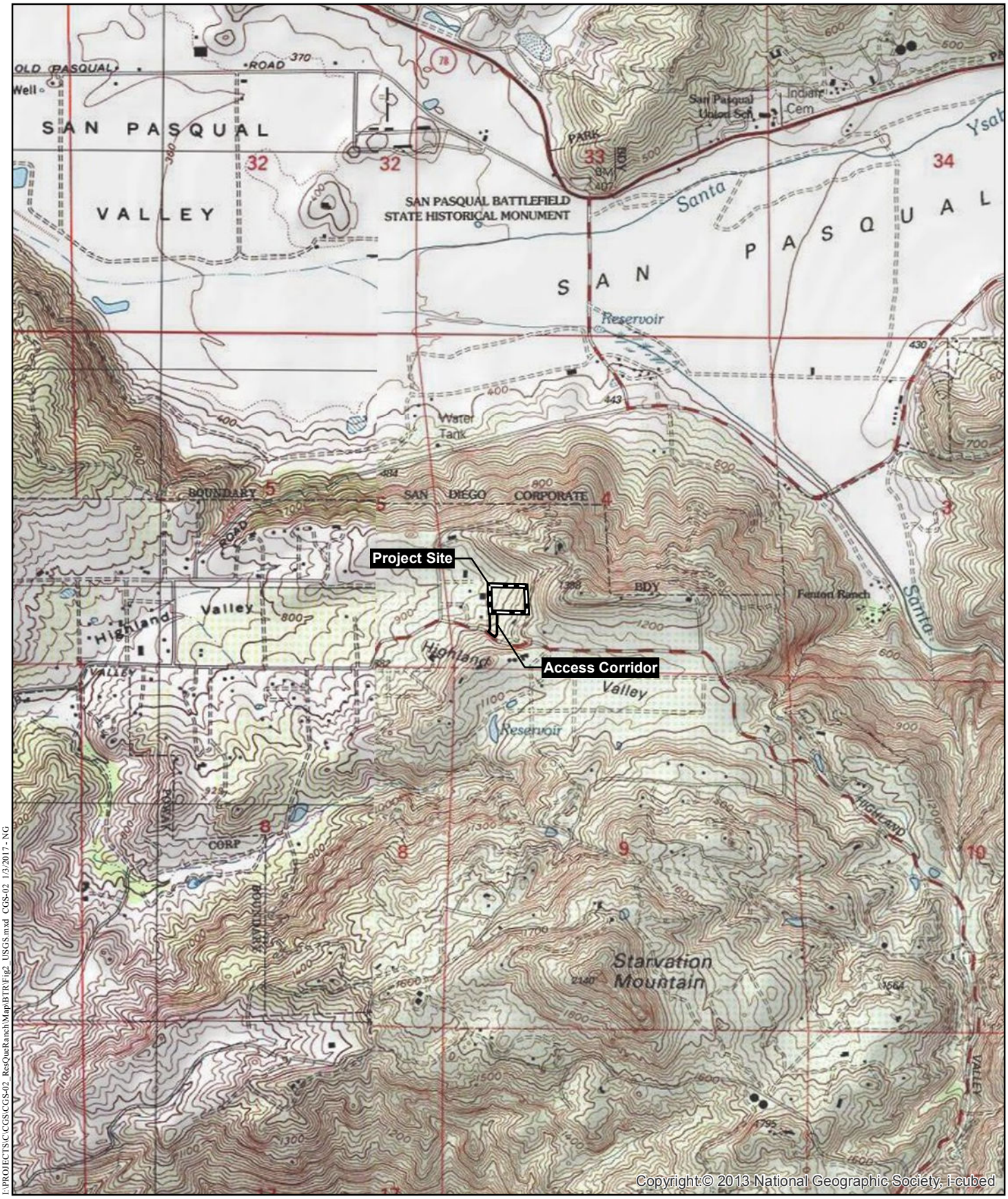
Regional Location

RESQUE RANCH

HELIX Environmental Planning

0 8 Miles

Figure 1



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Project Location - USGS Topography

RESQUE RANCH

HELIX Environmental Planning

N 0 2,000 Feet

Figure 2

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Aerial Photo Date: 2014

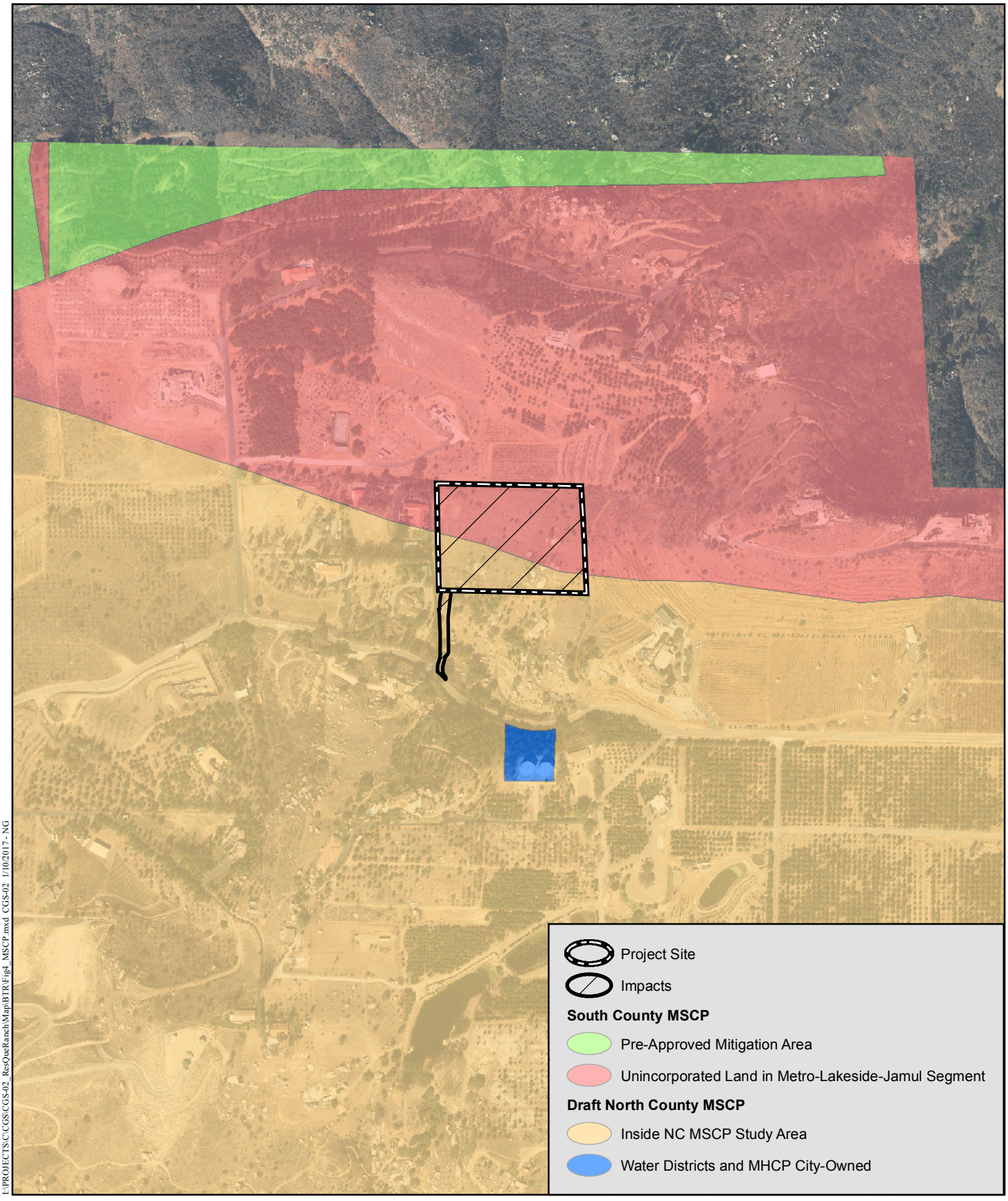
Aerial Photograph

RESQUE RANCH

HELIX Environmental Planning

N 0 500 Feet

Figure 3



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MSCP

RESQUE RANCH

HELIX Environmental Planning

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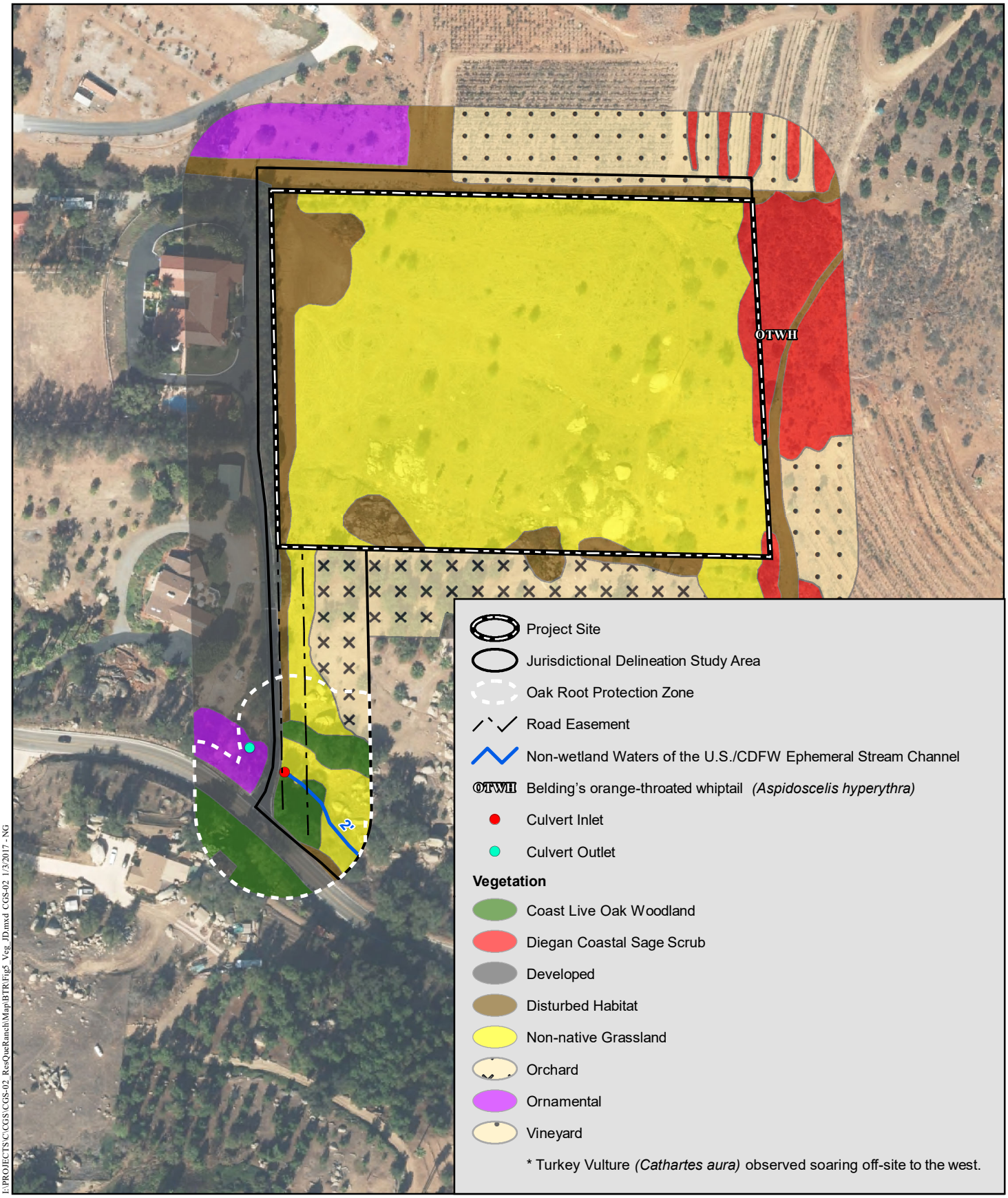
0 500 Feet

Figure 4



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Vegetation and Jurisdictional Resources

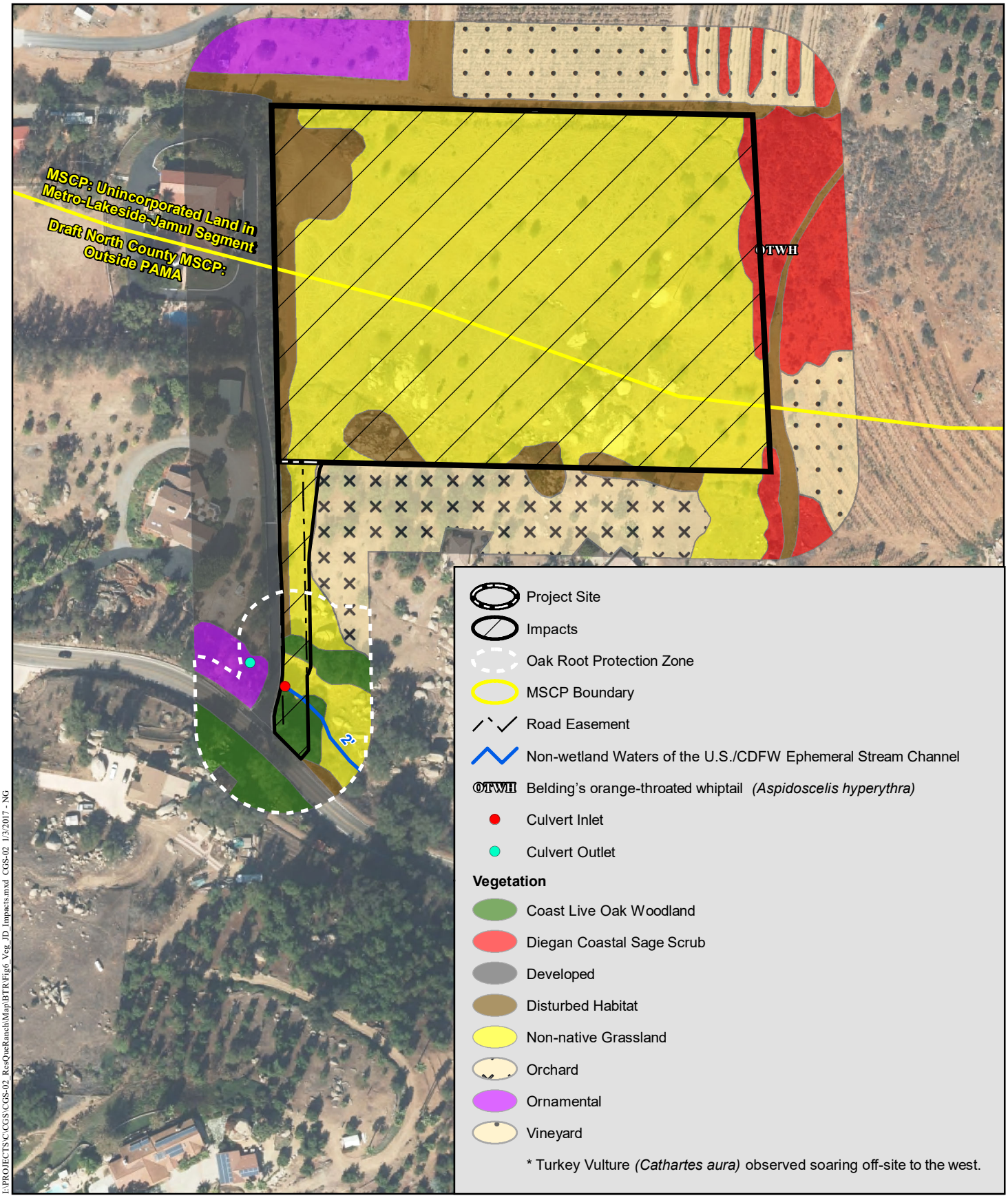
RESQUE RANCH

HELIX Environmental Planning

N

0 150 Feet

Figure 5



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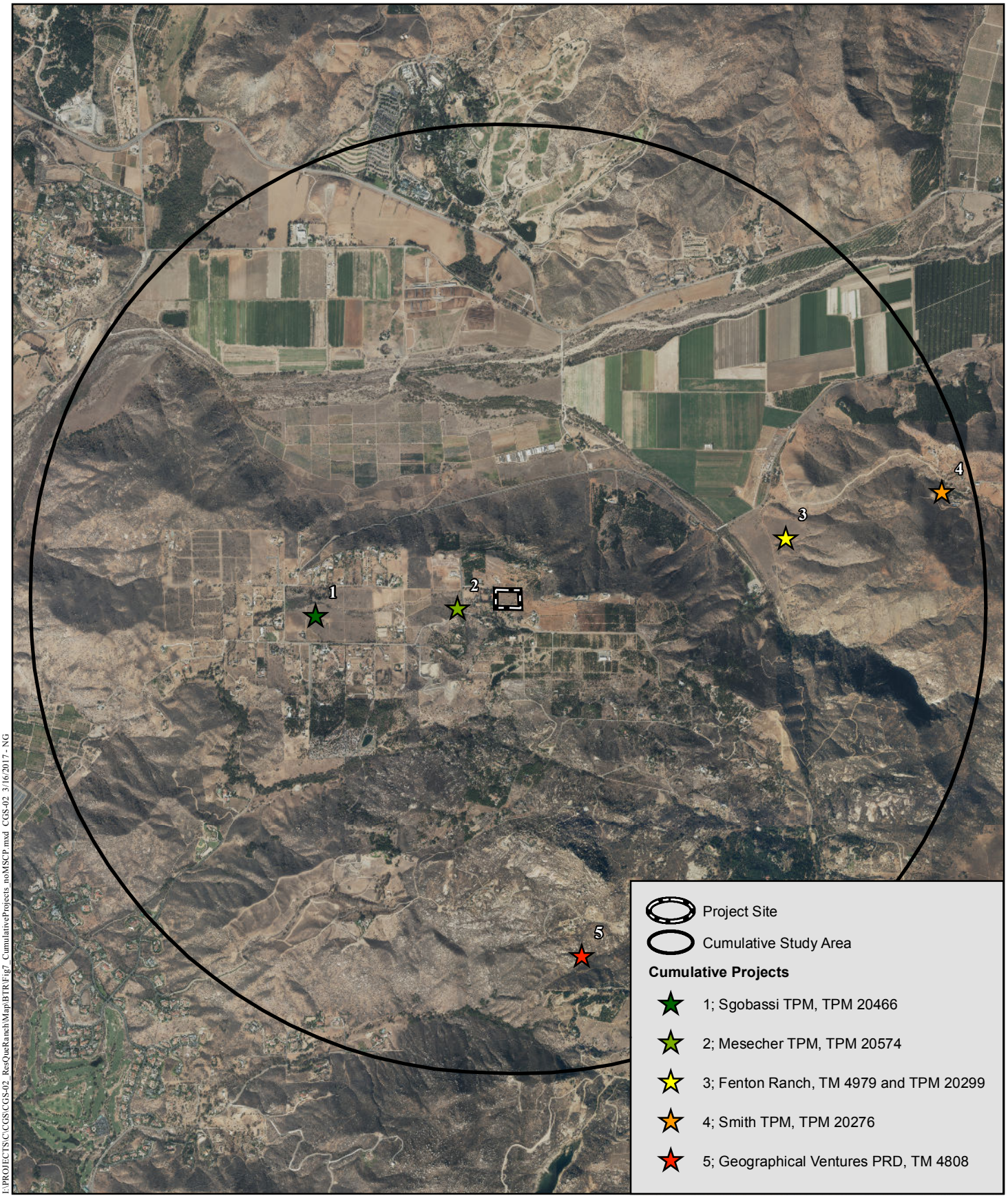
Vegetation and Jurisdictional Resources / Impacts

RESQUE RANCH

HELIX Environmental Planning

N 0 150 Feet

Figure 6



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Cumulative Projects

RESQUE RANCH

HELIX Environmental Planning

N 0 3,000 Feet

Figure 7

Attachment A
PLANT SPECIES OBSERVED

FAMILY	SCIENTIFIC NAME	COMMON NAME	HABITAT
Anacardiaceae	*Malosma laurina*	laurel sumac	CSS
Apocynaceae	*Nerium oleander**	oleander	DH
Arecaceae	*Washingtonia robusta**	Mexican fan palm	DH
Asteraceae	*Artemisia californica*	California sagebrush	CSS
	Brickellia californica	brickellbrush	CSS
	*Centaurea melitensis**	tocalote	CSS
	Erigeron canadensis	horseweed	DH, CLOW, NNG
	Heterotheca grandiflora	telegraph weed	NNG
	Pseudognaphalium californicum	California everlasting	CSS
Boraginaceae	*Phacelia* sp.	phacelia	CLOW
Brassicaceae	*Hirschfeldia incana**	short-pod mustard	CLOW
Chenopodiaceae	*Salsola tragus**	Russian thistle	CSS, DH, NNG
Convulvulaceae	*Calystegia macrostegia*	morning-glory	CSS
Euphorbiaceae	*Croton setigerus*	dove weed	CSS
	*Ricinus communis**	castor bean	DH, NNG
Fabaceae	*Acmispon glaber*	deerweed	CSS
Fagaceae	*Quercus agrifolia* var. *agrifolia*	coast live oak	CLOW, NNG
Lauraceae	*Persea americana**	avocado	ORCH
Myrtaceae	*Eucalyptus* sp.*	eucalyptus	DH
Poaceae	*Avena* sp.*	oats	CLOW, CSS, NNG
	*Bromus diandrus**	common ripgut grass	NNG
	*Bromus madritensis**	foxtail chess	CLOW, CSS, NNG
Polygonaceae	*Eriogonum fasciculatum*	buckwheat	CSS
Rosaceae	*Prunus ilicifolia* ssp. *ilicifolia*	holly-leafed cherry	CLOW
Solanaceae	*Datura wrightii*	jimson weed	CLOW, NNG
	*Nicotiana glauca**	tree tobacco	DH, NNG

*Non-native species
†Listed or sensitive species

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Attachment B
ANIMAL SPECIES OBSERVED OR DETECTED

FAMILY	SCIENTIFIC NAME	COMMON NAME
INVERTEBRATES		
Apidae	*Apis mellifera*	European honeybee
VERTEBRATES		
Reptiles		
Phrynosomatidae	*Sceloporus occidentalis*	western fence lizard
Phrynosomatidae	*Uta stansburiana*	common side-blotched lizard
Teiidae	*Aspidoscelis hyperythra*†	Belding's orange-throated whiptail*
Birds		
Cathartidae	*Cathartes aura*†	turkey vulture**
Corvidae	*Corvus corax*	common raven
Emberizidae	*Zonotrichia leucophrys*	white-crowned sparrow
	Melozone crissalis	California towhee
	Pipilo maculatus	spotted towhee
Fringillidae	*Spinus psaltria*	lesser goldfinch
Parulidae	*Setophaga coronata*	yellow-rumped warbler
Picidae	*Picoides nuttallii*	Nuttall's woodpecker
Tyrannidae	*Tyrannus vociferans*	Cassin's kingbird
Mammals		
Canidae	*Canis latrans*	coyote
Sciuridae	*Spermophilus beecheyi*	California ground squirrel

†Listed or sensitive species
* observed off site within the 100-foot buffer
** observed soaring off-site outside of the 100-foot buffer

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Attachment C
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR

Common Name	Species Name	Status	Habit, Ecology, and Life History	Potential to Occur
San Diego sagewort	*Artemisia palmeri*	--/-- CRPR 4.2 County List D	Shrub. Occurs in wetlands. Flowering period May-September.	**Not Likely to Occur** The survey area does not support suitable wetland habitat for this species.
San Diego milkvetch	*Astragalus oocarpus*	--/-- CRPR 1B.2 County List A	Perennial herb that occurs within open chaparral and cismontane woodland habitats. Known elevation limits: 305-1524 m. Flowering period May-August.	**Not Likely to Occur** The survey area is primarily characterized by disturbed habitats and does not support suitable habitat for this species. There is a record of this species occurring within the general vicinity of the site. However, no portions of the survey area are located or characterized by open chaparral and cismontane woodland.
San Diego County viguiera	*Bahiopsis laciniata*	--/-- CRPR 4.3 County List D	Shrub. Found in Diegan coastal sage scrub. Generally, shrub cover is more open than at mesic, coastal locales supporting sage scrub. Occurs on a variety of soil types. Flowering period February-August.	**Low Potential to Occur** The survey area is primarily characterized by disturbed habitats but suitable Diegan coastal sage scrub does occur on site. Site is surrounded by developed land and active agriculture.

Attachment C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR

Common Name	Species Name	Status	Habit, Ecology, and Life History	Potential to Occur
Thread-leaved brodiaea	*Brodiaea filifolia*	FT/SE CRPR 1B.1 County List A	Perennial herb. Found in clay soils in vernally moist grasslands and vernal pool periphery. Flowering period March-June.	**Not Likely to Occur** The survey area is primarily characterized by disturbed habitats and does not support suitable habitat for this species. There is a record of this species occurring within the general vicinity of the site. However, no portions of the survey area are characterized by vernal pools or vernally moist grasslands.
Smooth tarplant	*Centromadia pungens* ssp. *laevis*	--/-- CRPR 1B.1 County List A	Annual herb. Found in valley and foothill grasslands, particularly along creeks, in moist or seasonally flooded areas, and near alkaline locales. Known elevation limits: 5-1170 meters. Flowering period April-September.	**Low Potential to Occur** The survey area is primarily characterized by disturbed habitats and does not support suitable habitat for this species. There is a record of this species occurring within the general vicinity of the site. However, no portions of the survey area are characterized by natural valley or foothill grassland with wet or alkaline soils.

Attachment C (cont.)
SENSITIVE PLANT SPECIES POTENTIAL TO OCCUR

Common Name	Species Name	Status	Habit, Ecology, and Life History	Potential to Occur
Delicate clarkia	*Clarkia delicata*	--/-- CRPR 1B.2 County List A	Annual herb. Occurs in chaparral and cismontane woodlands often in gabbroic soils. Known elevation limits: 235-1000 m. Flowering period April-June.	**Not Likely to Occur** The survey area is primarily characterized by habitats and does not support suitable habitat for this species. No portions of the survey area are characterized by cismontane woodland, chaparral woodland or gabbroic soils.
Sticky dudleya	*Dudleya viscida*	--/-- CRPR 1B.2 County List A	Perennial herb. This conspicuous succulent perennial grows primarily on very steep north-facing slopes in coastal sage scrub and chaparral habitats. Flowering period May-June.	**Low Potential to Occur** The survey area is primarily characterized by disturbed habitats.Suitable Diegan coastal sage scrub does occur on site, but is not located on a steep north-facing slope. Site is surrounded by developed land and active agriculture.
Mission canyon bluecup	*Githopsis diffusa* ssp. *filicaulis*	--/-- CRPR 3.1 County List C	Annual herb. Found in montane meadows and lower montane coniferous forests, typically with sunny openings. Prefers very wet locales in early spring, although such places usually dry quickly as spring turns to summer. Flowering period - June.	**Not Likely to Occur** The survey area is primarily characterized by disturbed habitats and does not support suitable habitat for this species. Suitable montane meadows and lower montane coniferous forests are not present on site.

[1]Listing is as follows: F = Federal; S = State of California; E = Endangered; T = Threatened; R = Rare

[2]CRPR = California Native Plant Society Rare Plant Rank: 1A – presumed extirpated in California and either rare or extinct elsewhere; 1B – rare, threatened, or endangered in California and elsewhere; 2A – presumed extirpated in California, but more common elsewhere; 2B – rare, threatened, or endangered in California, but more common elsewhere; 3 – more information needed; 4 – watch list for species of limited distribution. Extension codes: .1 – seriously endangered; .2 – moderately endangered; .3 – not very endangered.

[3] County of San Diego Sensitive Plant Lists: A – rare, threatened, or endangered in California and elsewhere; B – rare, threatened, or endangered in California but more common elsewhere; C – may be quite rare but need more information; D – limited distribution and may be uncommon, but not presently endangered.

Attachment D
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Invertebrates							
Euphyes vestris harbisoni	Harbison's Dun Skipper	—	—	Group 1	MSCP Narrow Endemic	Riparian habitats and chaparral with narrow canyons or drainages, where perennial sources of water provide adequate habitat for the larval foodplant, San Diego sedge (*Carex spissa*).	**Not Likely to Occur** Riparian habitat and San Diego sedge, the larval host plant, does not occur in the survey area. Surrounding development and agriculture limits dispersal.
Lycaena hermes	Hermes Copper	—	—	Group 1	—	Southern mixed chaparral and coastal sage scrub with mature specimens of its larval host plant, spiny redberry (*Rhamnus crocea*).	**Not Likely to Occur** Although coastal sage scrub occurs in the survey area, it lacks the larval host plant, spiny redberry.
Reptiles and Amphibians							
Anaxyrus californicus	Arroyo toad	FE	SSC	Group 1	G2G3 S2S3	Found in semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Requires rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	**Not Likely to Occur** No suitable wetland or aquatic habitat occurs within the survey area. The survey area does not support washes or intermittent streams with loose gravelly soil. This species was observed in the vicinity (within 2 miles) but not along the same drainage.
Aspidoscelis hyperythra	Orange-throated whiptail	—	SSC	Group 2	G5 S2	Coastal scrub, chaparral, and valley and foothill hardwood habitats. Prefers washes and sandy areas with patches of brush and rocks. Perennial plants required to support its primary prey termites.	**Present Off Site, High Potential to Occur** A single individual was observed to the east of the site in the Diegan coastal sage scrub.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Reptiles and Amphibians (cont.)							
Aspidoscelis tigris stejnegeri	Coastal western whiptail	—	SSC	Group 2	G5T3T4 S2S3	Found in deserts and semiarid areas with sparse vegetation and open areas and in woodland and riparian areas. Substrate may be firm soil, sandy, or rocky at surface.	**Low Potential to Occur** No suitable habitat occurs within the survey area. The survey area is dominated by non-native grassland and surrounded by development and agriculture.
Coleonyx variegatus abbotti	San Diego banded gecko	—	SSC	Group 1	G5 S1	Rocky coastal sage and chaparral habitat, usually in areas between 150 and 900 meters in elevation.	**Low Potential to Occur** Although marginal coastal sage scrub occurs on site, the survey area occurs south of all CNDDB records for this species.
Crotalus ruber ruber	Northern red diamond rattlesnake	—	SSC	Group 2	G4 S3	Occurs from coastal San Diego County to the eastern slopes of the mountains and in desert habitats. Occurs from sea level to 900 meters in chaparral, woodland, and arid desert habitats in rocky areas and dense vegetation.	**High Potential to Occur** There are observations of this species in the vicinity (within 2 miles). The survey area is characterized by disturbed land and non-native grassland that lacks an abundance of suitable vegetative cover, but does include rocky outcrops.
Eumeces skiltonianus interparietalis	Coronado skink	—	SSC	Group 2	—	Found in grassland, chaparral, pinyon-juniper and juniper sage woodland, and pine-oak and pine forests.	**Not Likely to Occur** There are no observations within 2 miles and the site does not support the species' preferred habitat. The survey area does not support chaparral, juniper woodlands, or pine forests.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Reptiles and Amphibians (cont.)							
Lichanura (Charina) trivirgata roseofusca	Coastal rosy boa	—	—	Group 2	G4G5 S3S4	In coastal areas, this species occurs in rocky chaparral-covered hillsides and canyons, and scrub flats with good cover in deserts. Absent from grasslands but may occur in oak woodlands if it interdigitates with scrub or chaparral. Known to occur in San Diego County within CSS, chaparral, riparian, and mixed habitats. Prefers moderate to dense vegetative cover with rocks/rocky outcrops.	**Low Potential to Occur** The survey area is characterized by disturbed land and non-native grassland that lacks an abundance of suitable vegetative cover or rocky outcrops. Although Diegan coastal sage scrub and coastal live oak woodland occur on site, the habitat is fragmented and surrounded by development and agriculture.
Phrynosoma coronatum blainvillei	San Diego horned lizard	—	SSC	Group 2	G3G4 S3S4	Inhabits coastal sage scrub and chaparral in arid and semi-arid climate conditions and prefers friable, rocky, or shallow sandy soils.	**Low Potential to Occur** Diegan coastal sage scrub occurs on site, but the habitat is fragmented and surrounded by development and agriculture.
Salvadora hexalepis virgultea	Coast patch nosed snake	—	SSC	Group 2	—	Primarily found in chaparral but also inhabits coastal sage scrub and areas of grassland mixed with scrub.	**Not Expected to Occur** Diegan coastal sage scrub and non-native grassland occurs on site, but the habitat is fragmented and surrounded by development and agriculture.
Spea hammondii	Western spadefoot toad	—	SSC	Group 2	G3 S3	Found in coastal sage scrub, chaparral, and grassland habitats, but most common in grasslands with vernal pools or mixed grassland/CSS habitats. Requires long-lasting pools to complete metamorphosis.	**Not Likely to Occur** Although the survey area is characterized by Diegan coastal sage scrub and non-native grasslands, the site lacks vernal pools suitable for breeding.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Reptiles and Amphibians (cont.)							
Thamnophis hammondii	Two-striped garter snake	—	SSC	Group 1	G4 S3S4	Coastal California from vicinity of Salinas to northwest Baja California from sea level to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	**Not Likely to Occur** No suitable habitat occurs on or in the immediate vicinity of the survey area for this species. The site does not support a permanent stream or riparian growth.
Birds							
Accipiter cooperi	Cooper's hawk	—	—	Group 1	—	Open, uninterrupted, or marginal type woodlands. Nest sites in riparian growths of deciduous trees, live oaks. Also other various forest habitats that are near water. Dense woodlands and forests are primary foraging habitat for this accipiter.	**Low Potential to Occur** The survey area does not contain open, uninterrupted, or marginal type woodland; the coast live oak woodland that is present on site is fragmented and surrounded by development and agriculture.
Accipiter striatus	Sharp-shinned hawk	—	WL	Group 1	—	Usually observed in areas with tall trees or other vegetative cover but can be observed in a variety of habitats	**Low Potentail to Occur** The survey area does contain sparse oak and eucalyptus trees but the habitat is fragmented and surrounded by development and agriculture.
Agelaius tricolor	Tricolored blackbird	—	SSC	Group 1	G2G3 S1S2	Requires open water, protected nesting substrate, and foraging area with available insect prey.	**Not Likely to Occur** No portions of the survey area are currently characterized by open water with a protected nesting substrate.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Birds (cont.)							
Aimophila ruficeps canescens	Southern California rufous-crowned sparrow	—	SSC	Group 1	G5T3 S2S3	Resident in southern California coastal sage scrub and sparse mixed chaparral.	**Low Potential to Occur** The site contains Diegan coastal sage scrub but the habitat is fragmented and surrounded by development and agriculture.
Ammodramus savannarum parpallidus	Grasshopper sparrow	—	SSC	Group 1	—	Typical habitat is dense grasslands that have little or no shrub cover.	**Low Potential to Occur** The survey area is dominated by sparse non-native grasslands. Existing anthropogenic disturbances (human activity and domestic animals) would likely deter this species from nesting in the area.
Aquila chrysaetos	Golden eagle	—	SFP	Group 1	G5 S3	(Nesting and Wintering) Rolling foothills and mountain areas, juniper-sage flats, and deserts. Primarily associated with cliff-walled canyons and large trees in open habitats for nesting. Shrub-steppe and native grassland communities provide important foraging habitat. Also carrion.	**Low Potential to Occur** No suitable nesting habitat for this species occurs within the survey area due to lack of suitable cliff habitat and large trees in open areas. Existing anthropogenic disturbances would likely deter this species from utilizing the area.
Ardea herodias	Great blue heron	—	—	Group 2	—	Wetland habitats, but can be observed foraging away from water	**Not Likely to Occur** No suitable wetland habitat is found on site. The site is surrounded by development and agriculture which would deter this species from foraging in the study area.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Birds (cont.)							
Buteo swainsoni	Swainson's hawk	—	ST	Group 1	G5 S3	Nest in grasslands, but also use sage flats and swaths of agriculture and native habitat. Nests are often built in only tree visible for miles. Occurrences in San Diego County are typically during migration.	**Low Potential to Occur** Marginal foraging habitat occur within the survey area for this species. Existing anthropogenic disturbances would likely deter this species from using the area.
Campylorhynchus brunneicapillus sandiegensis	Coastal cactus wren	—	SSC	Group 1	G5T3Q S3	Coastal sage scrub with tall *Opuntia* cactus for nesting and roosting.	**Low Potential to Occur** No *Opuntia* cacti were observed on site. Diegan coastal sage scrub present on site is fragmented and existing anthropogenic disturbances would likely deter this species from nesting in the area.
Cathartes aura	Turkey vulture	—	—	Group 1	—	Found in open country, woodlands, and near farms.	**Present Off Site, Moderate Potential to Occur** A single individual was observed soaring to the west of the site. This species might fly over, but no suitable nesting habitat occurs on site for this species.
Haliaeetus leucocephalus	Bald eagle	—	SE	Group 1	County MSCP covered	In San Diego County, rare but observed annually in winter near lakes in foothills and mountains	**Low Potential to Occur** This species might fly over, but the site lacks lakes in foothills and mountains that are suitable habitat for this species.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Birds (cont.)							
Polioptila californica californica	Coastal California gnatcatcher	FT	SSC	Group 1	G3T2 S2	Obligate, permanent resident of coastal sage scrub below 2500 ft in southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	**Moderate Potential to Occur** The site supports a very small area of Diegan coastal sage scrub. The coastal California gnatcatcher might use the site for dispersal but would be unlikely to nest on site or in the adjacent sage scrub because of its small size of about 2 acres, surrounded by agricultural and residential development.
Vireo bellii pusillus	Least Bell's vireo	FE	SE	Group 1	G5T2 S2	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, mesquite.	**Not Likely to Occur** No suitable habitat occurs within the survey area. Willow-dominated riparian habitat does not occur within the survey area.
Mammals							
Antrozous pallidus	Pallid bat	—	SSC	Group 2	G5 S3	Roosts in crevices, caves, mine shafts, bridges, buildings and tree hollows. Forages on insects in wide variety of habitats.	**Not Likely to Occur** No suitable roosting habitat occurs within the survey area. No observations within 2 miles.
Bassariscus astutus	Ringtail	—	—	Group 2	—	Chaparral, rocky ridges and cliffs near water.	**Not Likely to Occur** There are no rocky ridges or cliffs near water on or in the vicinity of the survey area. Existing anthropogenic disturbances would likely deter this species from utilizing the site.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Mammals (cont.)							
Chaetodipus californicus femoralis	Dulzura pocket mouse	—	SSC	Group 2	G5T3 S3	Variety of habitats including coastal scrub, chaparral, and grasslands in San Diego County. Associated with grass-chaparral edges.	**Moderate Potential to Occur** There are no reported observations within 2 miles, but the site supports Diegan coastal sage scrub and non-native grassland.
Choeronycteris mexicana	Mexican long-tongued bat	—	SSC	Group 2	—	Arid scrub, mixed forest, and canyons in mountain ranges rising from the desert. By day, usually in caves and mines, but sometimes in buildings near the entrance.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the survey area. No arid scrub, mixed forest, or canyons in mountain ranges occur on site.
Eumops perotis californicus	Greater western mastiff bat	—	SSC	Group 2	G5T4 S3S4	Rocky areas and cliff faces. Roosts in cliff crevices and buildings.	**Not Likely to Occur** No suitable roosting or foraging habitat occurs within the survey area. The survey area does not contain rocky areas and cliff faces.
Felis concolor	Mountain lion	—	—	Group 2	—	Uses rocky areas, cliffs, and ledges that provide cover within open woodlands and chaparral, as well as riparian areas that provide protective habitat connections for movement between fragmented core habitats. Also, need both vertical and horizontal cover components, such as rocks and downed logs, to feel secure enough to bed.	**Low Potential to Occur** This species has been observed in the general vicinity of the survey area, along the San Dieguito River and north of SR-78, and could possibly pass through the site; however the survey area itself does not provide primary denning or foraging opportunities. Existing anthropogenic disturbances would likely deter this species from utilizing the site.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	**Common Name**	**Federal**	**State**	**San Diego County**	**Other**		
Mammals (cont.)							
Myotis ciliolabrum	Small-footed myotis	—	—	Group 2	G5 S3	Wide range of habitat types however primarily within arid wooded and brushy uplands, including open stands in forests and woodlands, adjacent to water. Caves, buildings, mines, and crevices used for refuge.	**Not Likely to Occur** The survey area is dominated by non-native grassland. Required habitat of arid wooded and brushy uplands is not found on site.
Nyctinomops femorosaccus	Pocketed free-tailed bat	—	SSC	Group 2	G4 S3	Occurs in arid areas associated with Pine-Juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian. Specifically in rocky areas with high cliffs.	**Not Likely to Occur.** No suitable roosting or foraging habitat occurs within the survey area. The survey area is not characterized by Pine-Juniper woodlands, desert scrub, palm oasis, desert wash, or desert riparian habitat.
Odocoileus hemionus	Southern mule deer	—	—	Group 2	—	Mule deer occupy a wide range of habitat types within their home range. In San Diego County, this species prefers more arid, open situations.	**Low Potential to Occur** This species has been observed in the general vicinity of the survey area and may pass through on occasion; however the survey area itself does not provide primary foraging opportunities. Existing anthropogenic disturbances would likely deter this species from utilizing the site.
Onychomys torridus ramona	Southern grasshopper mouse	—	SSC	Group 2	—	Arid habitats including various types of scrublands, low desert with creosote bush, mesquite, and yucca.	**Not Likely to Occur** The survey area does not contain scrublands or low desert with creosote bush, mesquite, and yucca that is suitable habitat for this species.

Attachment D (cont.)
SPECIAL STATUS ANIMAL SPECIES WITH POTENTIAL TO OCCUR

SPECIES		STATUS				REQUIRED HABITAT	POTENTIAL TO OCCUR/ KNOWN OCCURRENCE/ SUITABLE HABITAT
Scientific Name	Common Name	Federal	State	San Diego County	Other		

Federal
FE Federal Endangered
FT Federal Threatened
PFT Proposed Federal Threatened
C Candidate for Federal Listing

State
SE State Endangered
ST State Threatened
SSC California Species of Concern
FP Fully Protected Species
WL Watch List Species

Other
San Diego County Group 1
San Diego County Group 2

BLM: Sensitive

G Global Ranking Rarity
S State Ranking Rarity

Not Likely to Occur - There are no present or historical records of the species occurring on or in the vicinity, (within 2 miles) of the survey area and the diagnostic habitats strongly associated with the species do not occur on or in the vicinity of the survey area.

Low Potential to Occur - There is a historical record of the species in the vicinity of the survey area and potentially suitable habitat on the survey area, but existing conditions, such as density of cover, prevalence of non-native species, evidence of disturbance, limited habitat area, isolation, substantially reduce the possibility that the species may occur. The survey area is above or below the recognized elevation limits for this species.

Moderate Potential to Occur - The diagnostic habitats associated with the species occur on or in the vicinity of the survey area, but there is not a recorded occurrence of the species within the vicinity (within 2 miles). Some species that contain extremely limited distributions may be considered moderate, even if there is a recorded occurrence in the vicinity.

High Potential to Occur - There is both suitable habitat associated with the species and a historical record of the species on or in the vicinity of the survey area (within 2 miles).

Species Present - The species was observed on the survey area at the time of the survey or during a previous biological survey.

View of the project site and surrounding residential and agricultural land, facing northwest.

View of the project site and surrounding residential and agricultural land, facing northeast.

View of the eastern edge of the project site, adjacent coastal sage scrub and vineyard, facing east.

View of adjacent coastal sage scrub and vineyard east of the site.

View of the northern edge of the site, adjacent vineyard and residential land, facing west from the northeast corner of the site.