



Attachment 3

Rincon Consultants, Inc.

209 East Victoria Street
Santa Barbara, California 93101

805 319 4092 OFFICE AND FAX

info@rinconconsultants.com
www.rinconconsultants.com

March 30, 2020

Project No: 19-08526

Goleta Energy Storage, LLC

c/o: Peter Ledig

8614 Westwood Center Drive, Suite 1800

Vienna, Virginia 22182

Subject: Biological Resources Assessment for the Goleta Energy Storage Project, Goleta, California

Dear Mr. Ledig,

Rincon Consultants, Inc. (Rincon) is pleased to submit this Biological Resources Assessment (BRA) for the Goleta Energy Storage Project (project) located at 6864 and 6868 Cortona Drive in Goleta, California. The purpose of the BRA is to address the potential for sensitive biological resources to occur at the project site or be affected by construction of the project. Project impacts, relevant regulations, and proposed mitigation measures are discussed in the context of the Environmental Checklist Form in Appendix G of the State CEQA Guidelines.

Project Description and Location

The project would be located in the northern portion of Assessor's Parcel Number (APN) 073-140-027 along the northwest side of Cortona Drive in the city of Goleta (Figure 1). The project site is located in Township 5 north, Range 30 west (San Bernardino meridian), and is depicted on the *Goleta* Geological Survey 7.5-minute quadrangle map (USGS 2020). The project site is approximately 2.0 acres and is southeast of the intersection of Glen Annie Road/Storke Road/U.S. Highway 101 (US-101) southbound on-ramp (Figure 2). In addition, off-site improvements would include a generation tie-in line from the proposed BESS to the Southern California Edison (SCE) Isla Vista Substation within an underground utility conduit beneath Storke Road, and installation of frontage improvements along an approximately 350-foot-long segment of Cortona Drive near the project site (Figure 2).

The project site and off-site improvement areas are located outside the coastal zone in an area zoned as Business Park (BP) per the City's New Zoning Ordinance, adopted by City Council on March 3, 2020. The project site is currently developed with a storage shed, a small plant nursery, and a surface parking lot. An approved multi-family residential development is currently under construction immediately east of the project site. In addition, existing multi-family residential, commercial, and industrial uses occur on the west side of Storke Road in the project area; commercial and industrial uses occur to the south and southeast of the project site; and disturbed, undeveloped land, railway tracks, and US-101 to the north and northeast.

The project would include construction and operation of a battery energy storage system (BESS) consisting of a 60-megawatt battery storage facility with 84 Tesla Megapacks (self-contained energy storage and management cabinets), medium-voltage transformers, inverters, and a high-voltage generator step-up transformer. The project would also include an ancillary substation, parking, and

Figure 1 Regional Location



★ Project Location

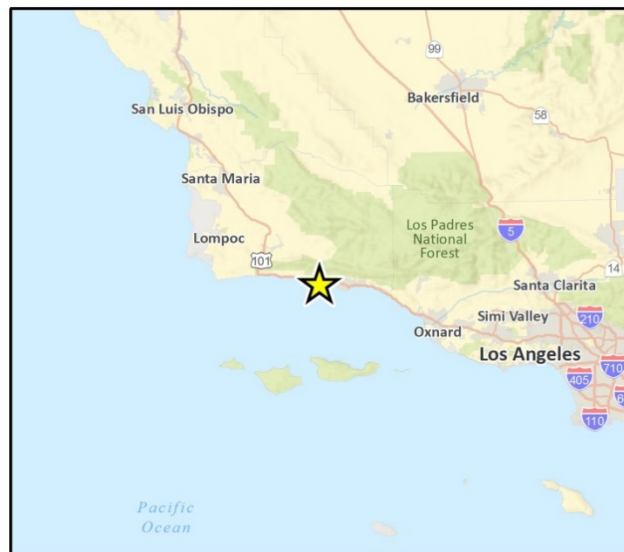


Fig 1 Regional Location

Figure 2 Project Location



Imagery provided by Microsoft Bing and its licensors © 2019.

Fig 2 Project Location - 2



other site improvements. The off-site work includes a generation tie-in line that would traverse beneath Storke Road by one of two potential utility conduits and connect to the SCE Isla Vista Substation, and improvements to the sidewalks, drainage features, and other infrastructure associated with Cortona Drive.

Methodology

Regulatory Overview

Regulated or sensitive biological resources studied and analyzed herein include special-status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement corridors, and locally protected resources such as protected trees. For the purpose of this report, the evaluation of potential impacts to biological resources was guided by the following statutes:

Federal

- Federal Endangered Species Act (FESA)
- Federal Clean Water Act (CWA)
- Migratory Bird Treaty Act (MBTA)
- The Bald and Golden Eagle Protection Act

State

- California Environmental Quality Act (CEQA)
- California Endangered Species Act (CESA)
- California Fish and Game Code (CFGC)
- Porter-Cologne Water Quality Control Act

Local

- City of Goleta General Plan
- Goleta Municipal Code
- City of Goleta Environmental Thresholds and Guidance Manual

Literature Review

Rincon biologists reviewed the project plans (provided by the project proponent), aerial photographs, and previous historical land use of the survey area. Queries of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2020) and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2020) were conducted to obtain comprehensive information regarding state and federally listed species, as well as other special-status species considered to have potential to occur within a 5-mile radius of the project site. For CNPS query purposes, a 9-quadrangle search area centered on the project site was used.

In addition, regionally occurring sensitive biological resources and geological information related to the site were researched from the following sources:



- United States Fish and Wildlife Service (USFWS) Critical Habitat Portal (USFWS 2020a)
- USFWS Information, Planning, and Conservation System (USFWS 2020b)
- USFWS National Wetland Inventory (NWI) Mapper (USFWS 2020c)
- Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2020a)

Field Survey

A field reconnaissance survey was conducted by Rincon biologist Yuling Huo on March 11, 2020 to document the existing site conditions and to evaluate the potential presence of sensitive biological resources, including special-status plant and animal species, sensitive plant communities, potentially jurisdictional wetlands and waters of the U.S. and State, and habitat for federally and state protected species. Weather conditions during the survey included an average temperature of approximately 60 degrees Fahrenheit, calm winds up to three miles per hour, and partly cloudy skies with good visibility. The biological study area included the project site and off-site work areas plus a 100-foot survey buffer (Figure 2). Accessible portions of the biological study area were surveyed on foot and inaccessible areas were observed remotely with 10x30 binoculars.

All biological resources observed within the biological study area were recorded, including plant and wildlife species. Plant species nomenclature and taxonomy follows *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et al. 2012). All species were identified to the lowest feasible taxonomic level based on field observations. Definitive surveys to confirm the presence or absence of special-status species were not performed and are not included within this analysis. The findings and opinions conveyed in this report are based exclusively on the methodology described above.

Existing Conditions

Soils

The biological study area contains four mapped soil types: Goleta fine sandy loam, Xerorthents (cut and fill areas), Milpitas-Positas fine sandy loams, and Milpitas-Positas fine sandy loams (eroded) (NRCS 2020a). These soil types are not listed as hydric soils (NRCS 2020b). Only Goleta fine sandy loam and Xerorthents (cut and fill areas) are present in the project site. The portion of the biological study area mapped as Goleta fine sandy loam is entirely developed or paved with asphalt.

Vegetation

Six vegetation communities occur within the biological study area: developed, disturbed, non-native ornamental, native ornamental, *Atriplex lentiformis* (quailbush scrub) Shrubland Alliance, and *Baccharis pilularis* (coyote brush) Shrubland Alliance (Figure 3). The vegetation classification used for this analysis is based on Sawyer et al. (2009) but was modified as needed to most accurately describe the existing vegetation communities on the project site. A total of 16 plant species were identified in the biological study area during the survey (Table 1), of which most were ornamental or weedy, non-native species.

Developed

Developed land includes areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. It is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation.

Figure 3 Vegetation Communities



Imagery provided by Microsoft Bing and its licensors © 2020.

Fig. 2 Vegetation Communities



The majority of the project site is occupied by developed land, including a paved parking lot, an existing building, dirt roads, and storage yards. The portion of the biological study area south of the project site is similarly developed, as is the off-site improvement area along Cortona Drive.

Disturbed

Disturbed habitats have been physically disturbed by previous legal human activity. Disturbed habitats are not recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Vegetation of disturbed areas, if present, is typically composed of ruderal exotics that take advantage of disturbance and inhibit the growth of native plants.

Disturbed vegetation is present in the northern half of the project site and much of the surrounding biological study area, including the proposed generation tie-in locations that would traverse Storke Road. Historical aerial imagery indicates that the vegetation and substrates in these areas have been regularly disturbed by mowing, disking, or grading. The plants observed in this area were primarily weedy, non-native species, including black mustard (*Brassica nigra*), castor bean (*Ricinus communis*), and cheeseweed mallow (*Malva parviflora*).

Non-Native Ornamental

Ornamental areas have been planted for the purpose of landscaping, typically with non-native species that require regular irrigation or other maintenance. Ornamental vegetation is present within and at the margins of the paved parking lot that occupies the southern and eastern portions of the project site and biological study area. These areas include maintained lawns, olive trees (*Olea europaea*), and other predominantly non-native trees and shrubs.

Native Ornamental

Several native California sycamore (*Platanus racemosa*) trees and toyon (*Heteromeles arbutifolia*) shrubs are present near the center of the project site in two areas totaling approximately 0.2 acre. These areas are surrounded by paved parking lot and disturbed land. It appears that the native trees and shrubs were intentionally planted, and the understory vegetation surrounding them has evidently been maintained. Because these areas are so small, isolated from other natural vegetation, subject to a high level of ongoing disturbance, and function as a landscaping feature, they cannot be characterized as a natural vegetation community. Although California sycamore is designated as a wetland indicator species, it has only a facultative association with wetlands and also occurs in non-wetland habitats (NRCS 2020c).

Atriplex lentiformis (quailbush scrub) Shrubland Alliance

This is a native shrub community in which quailbush (*Atriplex lentiformis*; also known as big saltbush) makes up more than 50 percent of the canopy cover. A small area (less than 0.1 acre) dominated by quailbush is present in the biological study area on the bank between the western boundary of the project site and Storke Road. It is surrounded by disturbed vegetation and likely also has a history of disturbance. Although quailbush is designated as a wetland indicator species, it has only a facultative association with wetlands and commonly occurs in non-wetland habitats (NRCS 2020c).



***Baccharis pilularis* (coyote brush) Shrubland Alliance**

This is a native shrub community in which coyote brush (*Baccharis pilularis*) makes up more than 50 percent of the canopy cover. A small area (approximately 0.1 acre) dominated by coyote brush is present in the biological study area immediately outside the eastern boundary of the project site. It is surrounded by developed and disturbed areas.

Table 1 Plant Species Observed During March 11, 2020 Field Reconnaissance Survey

Scientific Name	Common Name	Native or Non-Native?
<i>Baccharis pilularis</i>	coyote brush	Native
<i>Brassica nigra</i>	black mustard	Non-native
<i>Bromus</i> sp.	annual grasses	Non-native
<i>Calocedrus decurrens</i>	incense cedar	Non-native
<i>Eucalyptus</i> sp.	eucalyptus	Non-native
<i>Heteromeles arbutifolia</i>	toyon	Native
<i>Lupinus</i> sp.	lupine	Native
<i>Malva parviflora</i>	cheeseweed mallow	Non-native
<i>Metrosideros excelsa</i>	New Zealand Christmas tree	Non-native
<i>Olea europaea</i>	olive	Non-native
<i>Phoenix canariensis</i>	Canary Island date palm	Non-native
<i>Platanus racemose</i>	California sycamore	Native
<i>Ricinus communis</i>	castor bean	Non-native
<i>Taraxacum</i> sp.	dandelion	Non-native
<i>Vicia villosa</i>	hairy vetch	Non-native
<i>Washingtonia robusta</i>	Mexican fan palm	Non-native

Wildlife

The biological study area provides relatively little suitable habitat for wildlife species due to its developed nature and the lack of native vegetation. Avian species observed in the biological study area during the survey are included in Table 2. No other wildlife species were observed.

Table 2 Avian Species Observed During March 11, 2020 Field Reconnaissance Survey

Scientific Name	Common Name	Native or Non-Native?
<i>Bombycilla cedrorum</i>	cedar waxwing	Native
<i>Buteo jamaicensis</i>	red-tailed hawk	Native
<i>Calypte anna</i>	Anna’s hummingbird	Native
<i>Corvus brachyrhynchos</i>	American crow	Native
<i>Haemorhous mexicanus</i>	house finch	Native
<i>Melospiza crissalis</i>	California towhee	Native
<i>Sayornis nigricans</i>	black phoebe	Native



Significance Thresholds

Pursuant to Appendix G of the CEQA Guidelines, the proposed project result in a significant effect on biological resources if the project would:

- a) 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 CDFW or USFWS.
- b) Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors or impede the use of wildlife nursery sites.
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

In addition to the CEQA Guidelines, the City of Goleta Environmental Thresholds and Guidance Manual defines a significant impact to biological resources as one that:

- a) Substantially reduce or eliminate species diversity or abundance
- b) Substantially reduce or eliminate quantity or quality of nesting areas
- c) Substantially limit reproductive capacity through losses of individuals or habitat
- d) Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources
- e) Substantially limit or fragment range and movement (geographic distribution of animals and or seed dispersal routes)
- f) Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends

Sensitive Biological Resources and Impact Analysis

This section includes an analysis of potential impacts from the proposed project related to biological resources.

Special-Status Species and Nesting Birds

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:



- a) *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 CDFW or USFWS?*

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS under the FESA; those listed or candidates for listing as rare, threatened, or endangered by the CDFW under the CESA or Native Plant Protection Act; animals designated as “Fully Protected” by the CFGC; animals listed as “Species of Special Concern” (SSC) by the CDFW; CDFW Special Plants, specifically those with California Rare Plant Ranks (CRPR) of 1B, 2, 3, and 4 in the CNPS’s Inventory of Rare and Endangered Vascular Plants of California (CNPS 2018).

Local, State, and federal agencies regulate special-status species and may require an assessment of their presence or potential presence to be conducted on site prior to the approval of proposed development on a property. This section discusses sensitive biological resources observed on the project site and evaluates the potential for the project site to support other sensitive biological resources. A list of special-status plant and animal species with potential to occur in the biological study area was developed based on a review of a 5-mile search of the CNDDDB (CDFW 2020) and a 9-quad search of the CNPS’s online Inventory of Rare and Endangered Vascular Plants of California (CNPS 2020) and can be found in Attachment A.

The CNDDDB and CNPS queries identified 42 special-status plant species in the vicinity of the biological study area, of which 14 were documented within five miles of the biological study area. Special-status plant species typically have specialized habitat requirements, including plant community types, soils, and elevational ranges. The biological study area is predominantly developed or disturbed, and contains no habitats identified as suitable for the species documented in the vicinity of the biological study area. Therefore, it was determined that no special-status plant species have potential to occur in the biological study area. No special-status plant species were observed during the survey.

The CNDDDB query results identified 21 special-status wildlife species within five miles of the biological study area. The potential for special-status wildlife species to occur at the project site was assessed based on their known distribution and habitat requirements and the existing conditions of the site. No special-status wildlife species were detected during the survey, and none were determined to have potential to occur due to the developed and disturbed condition of the biological study area, high levels of human disturbance, absence of native vegetation or aquatic habitat, and isolation from suitable habitat in the surrounding landscape. No critical habitat designated by USFWS is present in the biological study area. The closest critical habitat, for tidewater goby (*Eucyclogobius newberryi*), is located approximately 0.7 mile southeast of the biological study area (USFWS 2020a).

Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC and MBTA. Native and ornamental trees and shrubs and man-made structures in the biological study area could provide habitat for nesting birds. No nests or birds exhibiting nesting behaviors were observed during the survey. However, if project activities occur during the nesting season (typically February 1 through August 31), nesting birds may be impacted. The potential impact would be reduced below a significant level through implementation of Mitigation Measure BIO-1, described below.

Sensitive Natural Communities

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:



- b) *Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.*

No sensitive natural communities are present in the biological study area. Although California sycamore trees (*Platanus racemosa*) are present in the biological study area and California sycamore woodland is designated as sensitive by CDFW (CDFW 2019), the sycamore trees in the biological study area are functionally ornamental and do not constitute a natural California sycamore woodland. Therefore, no impact to sensitive natural communities would occur.

Jurisdictional Wetlands and Waterways

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

- c) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*

A formal jurisdictional delineation was not conducted. However, no waters or wetlands that might meet the standards for federal protection under jurisdiction of the United States Army Corps of Engineers (USACE) were observed during the field survey. No waters or wetlands identified by the NWI are mapped within the biological study area. The nearest is located approximately 500 feet north of the biological study area on the opposite side of the railroad and US-101 (USFWS 2020c). No riparian vegetation that might be protected under jurisdiction of CDFW was observed in the biological study area. Two plant species designated as wetland indicator species (quailbush and California sycamore) were observed in the biological study area. However, both of these species have only a facultative association with wetlands and also occur in non-wetland habitats. Based on the vegetation and substrates observed during the survey, the areas where these species occur do not constitute wetlands as defined by the City of Goleta (City of Goleta 2006).

One, small, engineered bioswale is present in the biological study area immediately outside the southeastern boundary of the project site in a landscaped area surrounded by paved parking lot (Attachment B; Photograph 2). A small culvert appears to transmit flows from the bioswale outside the biological study area. No water was present in the basin during the survey, and no wetland or riparian vegetation is associated with it. This feature most likely does not meet the standards for jurisdiction under the Regional Water Quality Control Board (RWQCB).

The project would have no direct effects on jurisdictional waters or wetlands. Potential indirect effects on off-site waters or wetlands via the bioswale culvert would be made less than significant with implementation of Mitigation Measure Bio-2, described below.

Wildlife Movement

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

- d) *Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.*

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local



purpose, such as between foraging and breeding areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

The biological study area is not in an area identified as a wildlife corridor. The potential movement of wildlife through the biological study area is minimal given the densely developed nature of the site and adjacent properties to the south, east, and west. Although open space is present north of the biological study area, the intervening railroad and Highway 101 represent substantial barriers to wildlife movement. The proposed project would not impede wildlife movement, and no impacts would occur.

Local Policies and Ordinances

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

Environmentally Sensitive Habitat Areas

Under Policy CE 1 of the City of Goleta General Plan/Coastal Land Use Plan (GP/CLUP), all Environmentally Sensitive Habitat Areas (ESHA) identified in Figure 4-1 of the GP/CLUP shall be protected against significant degradation of habitat value (City of Goleta 2006). New development shall be sited and designed to avoid impacts to ESHA. If no feasible alternative can eliminate all impacts, the alternative that would result in the fewest or least significant impacts shall be selected. Any impacts that cannot be avoided shall be fully mitigated, with priority given to on-site mitigation.

No ESHA identified in Figure 4-1 of the Goleta GP/CLUP are present in the biological study area, and the project would have no effect on these resources. Therefore, no impacts to ESHA would occur.

Protected Trees

There is currently no Tree Protection Ordinance in place in the City of Goleta. Protection of trees in the City is regulated by the Conservation Element 9 (CE 9) of the Goleta GP/CLUP, which states that all native tree species are protected. However, the Grading Ordinance Guidelines for Native Oak Tree Removal in the Goleta Municipal Code (City of Goleta 2019) clarifies that coast live oak trees are protected only when they have a diameter at breast height (DBH) of eight inches or greater, and that no oak trees voluntarily planted during landscaping are protected.

A formal arborist survey was not conducted. However, several California sycamore trees, a species cited as protected under CE 9, were observed in the project site. Several individuals of toyon that may also qualify for protection on under CE 9 are also present. The project would require the removal of three sycamore trees, as well as the planting of four new sycamores and nine new oak trees. The proposed replacement of three removed native trees with 13 native trees would ensure that impacts with be less than significant.



Habitat Conservation Plans

Pursuant to Appendix G of the CEQA Guidelines, the proposed project would have a significant effect on biological resources if it would:

- f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.*

The biological study area is not subject to any Habitat Conservation Plan, Natural Conservation Community Plan, or other local, regional, or state habitat conservation plan. Therefore, no impacts would occur.

Mitigation Measures

BIO-1: Pre-Construction Nesting Bird Surveys

- To avoid disturbance of nesting and special-status birds, including raptor species protected by the MBTA and CFGC, project activities including vegetation removal, ground disturbance, construction, and demolition shall occur outside of the bird breeding season (February 1 through August 31), if feasible.
- If work must begin during the breeding season, a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of project activities. The nesting bird survey shall be conducted inside the project footprint plus a 500-foot for raptors and special-status species and a 300-foot buffer for all other birds. Inaccessible parts of the survey area shall be scanned using binoculars to ensure 100 percent visual coverage. The survey shall be conducted by a biologist familiar with the identification of bird species known to occur in southern California communities.
- If active nests (those containing eggs, nestlings, or associated with dependent fledglings) are found on-site, an avoidance buffer shall be implemented around each nest and demarcated with fencing or flagging. The size of the buffers shall be determined by the biologist based upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. No project activity shall occur inside a nest buffer until the biologist determines that the nest is no longer active.
- If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

BIO-2: Construction Best Management Practices

The following construction Best Management Practices (BMPs) shall be implemented to minimize stormwater runoff via the bioswale culvert:

- No work shall occur in the bioswale when water is present
- No soil or other materials shall be stockpiled in the bioswale
- Fiber rolls or other sediment control systems shall be installed in and around the bioswale
- Vehicles and equipment shall be maintained to avoid leaks
- Pallets or secondary containment areas shall be utilized for storage of chemicals, drums, or bagged material



Limitations

This document was prepared for use solely and exclusively by Goleta Energy Storage, LLC, care of Peter Ledig, who may use it to provide information to satisfy CEQA requirements. No other use or disclosure is intended or authorized by Rincon, nor shall this report be relied upon or transferred to any other party without the express written consent of Rincon. This work has been performed in accordance with good commercial, customary, and generally accepted biological investigation practices conducted at this time and in this geographic area. The findings and opinions conveyed in this report are based on a suitability analysis level only and did not include definitive surveys for the presence or absence of the special-status species that may be present. Definitive surveys for special-status wildlife and plant species generally require specific survey protocols requiring extensive field survey time to be conducted only at certain times of the year. The findings and opinions conveyed in this report are based on this methodology. It is understood that Rincon is to be held harmless for any inverse condemnation or devaluation of said property that may result if Rincon's report or information generated during our performance of services is used for other purposes.

Thank you for the opportunity to continue to support you on this project. Please contact us if you have any questions.

Sincerely,
Rincon Consultants, Inc.

A handwritten signature in black ink, appearing to read "Nathan Marcy".

Nathan Marcy
Associate Biologist

A handwritten signature in black ink, appearing to read "Christopher Julian".

Christopher Julian
Principal/Senior Regulatory Specialist

Attachments

- Attachment A CNDDDB/CNPS Query Results and Occurrence Potentials
- Attachment B Site Survey Photographs



References

- Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, editors. 2012. *The Jepson Manual: Vascular Plants of California, second edition*. University of California Press, Berkeley, CA.
- California Department of Fish and Wildlife. 2019. California Sensitive Natural Communities. Available at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>. Accessed: March 2020.
- _____. 2020. California Natural Diversity Database (CNDDDB), Rarefind 5 (online). Commercial Version. Accessed: March 2020.
- California Native Plant Society. 2020. Inventory of Rare and Endangered Plants. Online Edition, v8-02. Available at: www.rareplants.cnps.org. Accessed: March 2020.
- Goleta, City of. 2006. General Plan. Available at <https://www.cityofgoleta.org/city-hall/planning-and-environmental-review/general-plan>. Accessed: March 2020.
- _____. 2019. Goleta Municipal Code, Appx. A Grading Ordinance Guidelines for Native Oak Tree Removal. Available at http://qcode.us/codes/goleta/view.php?topic=15-15_09-appx_a_grading_ordinance_guidelines_for_&frames=on. Accessed: March 2020.
- Natural Resources Conservation Service. 2020a. Web Soil Survey. Available at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed: March 2020.
- _____. 2020b. State Soil Data Access (SDA) Hydric Soils List. https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1316619.html. Accessed: March 2020.
- _____. 2020c. Wetland Indicator Status Search. <https://plants.usda.gov/core/wetlandSearch>. Accessed: March 2020.
- Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2020. *A Manual of California Vegetation, Second Edition*. California Native Plant Society, Sacramento, California.
- United States Fish and Wildlife Service. 2020. Critical Habitat Portal. Available at: <http://criticalhabitat.fws.gov>. Accessed: March 2020.
- _____. 2020b. Information, Planning, and Conservation System. Available at: <http://ecos.fws.gov/ipac>. Accessed: March 2020.
- _____. 2020c. National Wetland Inventory. Available at: <http://www.fws.gov/wetlands/Data/Mapper.html>. Accessed: March 2020.
- USGS. 2020. US Topo: Maps for America. Available at: <https://ngmdb.usgs.gov/topoview>. Accessed: March 2020.

Attachment A

CNDDDB/CNPS Query Results and Occurrence Potentials



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Plants				
<i>Abronia maritima</i> red sand-verbena	None/None 4.2	Coastal dunes. Elevations between sea level and 350 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Amsinckia douglasiana</i> Douglas' fiddleneck	None/None 4.2	Cismontane woodland, valley and foothill grassland. Monterey shale. Elevations between sea level and 6,400 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Anomobryum julaceum</i> slender silver moss	None/None 4.2	Broadleafed upland forest, lower montane coniferous forest, and north coast coniferous forest. Grows on damp rocks and soil, acidic substrates. Usually seen on roadcuts. Elevations between 300 and 3,300 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Arctostaphylos refugioensis</i> Refugio manzanita	None/None 1B.2	Chaparral, on sandstone. Elevations between 200 and 2,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Atriplex coulteri</i> Coulter's saltbush	None/None 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub, and valley and foothill grassland. Ocean bluffs, ridgetops, as well as alkaline low places. Alkaline or clay soils. Elevations between sea level and 1,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Atriplex serenana</i> var. <i> davidsonii</i> Davidson's saltscale	None/None 1B.2	Coastal bluffs and coastal scrub. Alkaline soil. Elevations between sea level and 1,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Calandrinia breweri</i> Brewer's calandrinia	None/None 4.2	Chaparral and coastal scrub. Disturbed sites and burns in sandy or loamy soil. Elevations between 30 and 4,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Calochortus catalinae</i> Catalina mariposa lily	None/None 4.2	Chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland. Elevations between 50 and 2,300 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Calochortus fimbriatus</i> late-flowered mariposa-lily	None/None 1B.3	Dry, open coastal woodland, riparian woodland, and chaparral. Serpentine soils. Elevations between 900 and 4,700 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Calystegia sepium</i> ssp. <i>binghamiae</i> Santa Barbara morning-glory	None/None 1A	Coastal marshes and swamps. Elevations between sea level and 20 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Centromadia parryi</i> ssp. <i>australis</i> southern tarplant	None/None 1B.1	Marshes and swamp margins, valley and foothill grassland, and vernal pools. Often in disturbed sites near the coast. Also in alkaline soils, sometimes with saltgrass. Elevations between sea level and 3,200 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Cercocarpus betuloides</i> var. <i>blancheae</i> island mountain-mahogany	None/None 4.3	Closed-cone coniferous forest and chaparral. Elevations between 100 and 2,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Chorizanthe palmeri</i> Palmer's spineflower	None/None 4.2	Chaparral, cismontane woodland, and valley and foothill grassland. Rocky and serpentinite soils. Elevations between 150 and 3,100 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Convolvulus simulans</i> small-flowered morning-glory	None/None 4.2	Openings in chaparral, coastal scrub, and valley and foothill grassland. Clay soils and serpentinite seeps. Elevations between 100 and 2,400 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Deinandra paniculata</i> paniculate tarplant	None/None 4.2	Coastal scrub, valley and foothill grassland, and vernal pools. Usually vernal mesic or sandy sites. Elevations between 80 and 3,100 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Delphinium umbracolorum</i> umbrella larkspur	None/None 1B.3	Chaparral and cismontane woodland. Elevations between 1,300 and 5,250 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Eriodictyon capitatum</i> Lompoc yerba santa	FE/CR 1B.2	Coastal bluff scrub, closed-cone coniferous forest, and maritime chaparral. Sandy soils. Elevations between 100 and 3,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Eriogonum elegans</i> elegant wild buckwheat	None/None 4.3	Cismontane woodland, valley and foothill grassland. Usually sandy or gravelly sites, often washes, sometimes roadsides. Elevations between 650 and 5,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Cercocarpus betuloides</i> var. <i>blancheae</i> island mountain-mahogany	None/None 4.3	Closed-cone coniferous forest and chaparral. Elevations between 100 and 2,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Fritillaria ojaiensis</i> Ojai fritillary	None/None 1B.2	Broadleafed upland mesic forest, lower montane coniferous forest, and chaparral. Usually on loamy soil, sometimes serpentine. Sometimes found along roadsides. Elevations between 300 and 3,700 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	None/None 1B.1	Chaparral, cismontane woodland, and coastal scrub. Sandy or gravelly sites. Elevations between 50 and 5,400 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Juncus luciensis</i> Santa Lucia dwarf rush	None/None 1B.2	Vernal pools, wet meadows, seeps, and ephemeral drainages in lower montane coniferous forest, chaparral, and Great Basin scrub. Elevations between 1,000 and 6,700 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Lasthenia conjugens</i> Contra Costa goldfields	FE/ None 1B.1	Vernal pools, swales, and low depressions in valley and foothill grassland, cismontane woodland, and alkaline playas. Elevations between sea level and 1,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	None/None 1B.1	Coastal salt marshes, playas, and vernal pools, usually on alkaline soils. Elevations between sea level and 4,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Layia heterotricha</i> pale-yellow layia	None/None 1B.1	Cismontane woodland, pinyon and juniper woodland, coastal scrub, and valley and foothill grassland. Alkaline or clay soils in open areas. Elevations between 300 and 5,900 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Lilium humboldtii</i> ssp. <i>ocellatum</i> ocellated Humboldt lily	None/None 4.2	Openings in chaparral, coastal scrub, lower montane coniferous forest, cismontane woodland, and riparian woodland. Elevations between 100 and 5,900 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Lonicera subspicata</i> var. <i>subspicata</i> Santa Barbara honeysuckle	None/None 1B.2	Chaparral, cismontane woodland, and coastal scrub. Elevations between 20 and 2,700 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Malacothrix saxatilis</i> var. <i>arachnoidea</i> Carmel Valley malacothrix	None/None 1B.2	Rocky sites in chaparral and coastal scrub. Elevations between 80 and 3,400 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella	None/None 1B.3	Chaparral and cismontane woodland. Elevations between 160 and 5,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Monardella sinuata</i> ssp. <i>sinuata</i> southern curly-leaved monardella	None/None 1B.2	Coastal dunes and openings in Coastal scrub, chaparral, and cismontane woodland. Sandy soils. Elevations between sea level and 1,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Monolopia congdonii</i> San Joaquin woollythreads	FE/None 1B.2	Chenopod scrub and valley and foothill grassland. Sandy soils. Elevations between 200 and 2,600 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Nasturtium gambelii</i> Gambel's water cress	FE/CT 1B.1	Freshwater or brackish marshes and swamps. Elevations between sea level and 1,100 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Navarretia ojaiensis</i> Ojai navarretia	None/None 1B.1	Openings in chaparral, coastal scrub, and valley and foothill grassland. Elevations between 900 and 2,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Phacelia hubbyi</i> Hubby's phacelia	None/None 4.2	Chaparral, coastal scrub, and valley and foothill grassland. Gravelly and rocky sites. Elevations between sea level and 3,300 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Pleuridium mexicanum</i> Mexican earthmoss	None/None 2B.1	Chaparral on sandstone substrate.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Quercus dumosa</i> Nuttall's scrub oak	None/None 1B.1	Closed-cone coniferous forest, chaparral, and coastal scrub. Sandy and clay loam soils. Elevations between 50 and 1,300 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Sanicula hoffmannii</i> Hoffmann's sanicle	None/None 4.3	Broadleafed upland forest, cismontane woodland, lower montane coniferous forest, coastal bluff scrub, chaparral, and coastal scrub. Often serpentinite or clay soils. Elevations between 100 and 1,000 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Scrophularia atrata</i> black-flowered figwort	None/None 1B.2	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, and riparian scrub. Around swales and dunes in sand, diatomaceous shales, and soils derived from other parent material. Elevations between 30 and 1,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Senecio astephanus</i> San Gabriel ragwort	None/None 4.3	Coastal bluff scrub and Chaparral. Rocky slopes. Elevations between 1,300 and 4,900 feet.	Not Expected	CNPS record; not documented within five miles. Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Suaeda esteroa</i> estuary seablite	None/None 1B.2	Coastal marshes and swamps in clay, silt, and sand substrates. Elevations between sea level and 150 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	None/None 2B.2	Meadows, seeps, and along streams. Elevations between 200 and 3,000 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Thermopsis macrophylla</i> Santa Ynez false lupine	None/Rare 1B.3	Chaparral. Open areas, such as fuel breaks and burned areas, on sandstone. Elevations between 1,200 and 3,500 feet.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
Invertebrates				
<i>Bombus crotchii</i> crotch bumble bee	None/CSE	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Danaus plexippus</i> pop. 1 monarch - California overwintering population	None/None	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Not Expected	Although roosting sites are documented nearby, no suitable overwintering habitat exists at the project site.
Fishes				
<i>Eucyclogobius newberryi</i> tidewater goby	FE/None SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches. Needs fairly still but not stagnant water and high oxygen levels.	Not Expected	No aquatic habitat is present at the project site.
Amphibians				
<i>Rana draytonii</i> California red-legged frog	FT/None SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Not Expected	Project site is predominantly developed/disturbed. No aquatic habitat is present in the vicinity.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Taricha torosa</i> Coast Range newt	None/None SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats and will migrate over 0.5 mile to breed in ponds, reservoirs, and slow moving streams.	Not Expected	Project site is predominantly developed/disturbed. Nearest aquatic habitat is on the opposite side of highway and railroad.
Reptiles				
<i>Anniella pulchra</i> northern California legless lizard	None/None SSC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.	Not Expected	Project site is predominantly developed/disturbed. Suitable loose, moist soils are not present.
<i>Emys marmorata</i> western pond turtle	None/None SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.25 mile from water for egg-laying.	Not Expected	Project site is predominantly developed/disturbed. Nearest aquatic habitat is on the opposite side of highway and railroad.
Birds				
<i>Agelaius tricolor</i> tricolored blackbird	None/ST SSC	Highly colonial species, most numerous in Central Valley and vicinity. Requires open water, protected nesting substrate, and foraging area with insect prey within a few miles of the colony.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Ammodramus savannarum</i> grasshopper sparrow	None/None SSC	Dense grasslands on lower mountain slopes, rolling hills, lowland plains, and valleys. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Athene cucularia</i> burrowing owl	None/None SSC	Open, dry, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent on burrowing mammals, most notably the California ground squirrel.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present. No mammal burrows observed at the site.
<i>Charadrius alexandrinus nivosus</i> western snowy plover	FT/None SSC	Sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Elanus leucurus</i> white-tailed kite	None/None FP	River bottomlands or rolling hills next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Not Expected	Although trees are present in the project site, due to the high level of ongoing disturbance and lack of suitable foraging habitat in the project site and surrounding area, the project site is not suitable nesting habitat.
<i>Passerculus sandwichensis beldingi</i> Belding's savannah sparrow	None/SE	Coastal salt marshes from Santa Barbara south through San Diego County. Nests in Salicornia on and about margins of tidal flats.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Pelecanus occidentalis californicus</i> California brown pelican	DL/DL FP	Colonial nester on coastal islands just outside the surf line. Nests on coastal islands of small to moderate size which afford immunity from attack by ground-dwelling predators.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Rallus obsoletus levipes</i> light-footed Ridgway's rail	FE/SE FP	Salt marshes traversed by tidal sloughs where cordgrass and pickleweed are the dominant vegetation. Requires dense growth for nesting or escape cover; feeds on molluscs and crustaceans.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Sternula antillarum browni</i> California least tern	FE/SE FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated flat substrates including sand beaches, alkali flats, land fills, or paved areas.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
Mammals				
<i>Antrozous pallidus</i> pallid bat	None/None SSC	Deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.



Scientific Name Common Name	Status*	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None/None SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Eumops perotis californicus</i> western mastiff bat	None/None SSC	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces, high buildings, trees, and tunnels.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Lasiurus blossevillii</i> western red bat	None/None SSC	Roosts primarily in trees, up to 40 feet above ground. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None/None SSC	Coastal scrub of Southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs, and slopes.	Not Expected	Project site is predominantly developed/disturbed. No suitable habitat is present.

***Federal and State Status**

- FE Federal Endangered
- FT Federal Threatened
- SE California Endangered
- ST California Threatened
- DL Delisted
- CSE Candidate for California Endangered
- SSC California Species of Special Concern
- FP Fully Protected, CDFW

California Rare Plant Rank (RPR)

- RPR 1A California Native Plant Society/CDFG listed as presumed to be extinct
- RPR 1B California Native Plant Society/CDFG listed as rare or endangered in California and elsewhere
- RPR 2 California Native Plant Society/CDFG listed as rare or endangered in California but more common elsewhere
- RPR 4 California Native Plant Society/CDFG listed as of limited distribution or infrequent throughout a broader area in California.

Attachment B

Site Survey Photographs



Photograph 1. View of a developed area (parking lot) and ornamental vegetation in the project site. Photograph taken from near the southern corner of the project site facing northeast.



Photograph 2. View of a bioswale in a developed area of the biological study area. Photograph taken near the southeastern boundary of the project site facing northeast.



Photograph 3. View of California sycamore woodland in the project site. Photograph taken near the northern boundary of the project site facing west.



Photograph 4. View of an existing structure in a developed area of the project site. Photograph taken near the southwestern corner of the project site facing northwest.



Photograph 5. View of a developed area (storage yard) in the project site. Photograph taken from near the northern corner of the project site facing west.



Photograph 6. View from near the northern corner of the project site facing southeast.



Photograph 7. View of disturbed vegetation, the Amtrak railway, and the Storke Road overpass in the biological study area north of the project site. Photograph taken near the northern corner of the project site facing northwest.



Photograph 8. View of disturbed vegetation in the biological study area north of the project site. Photograph taken near the northern corner of the project site facing east.