

June 12, 2023

Mr. Ryan T. Clark
Southwest Signal Service
PO Box 1297
El Cajon, CA 92022

Re: Biological Resources Letter Report for the 10756 Rockvill Street Project, City of Santee, California

Mr. Clark:

Busby Biological Services, Inc. has prepared this biological letter report for the proposed 10756 Rockvill Street Project (proposed project), which is located within the City of Santee (City), California. This report was prepared in accordance with the City's draft Multiple Species Conservation Program (MSCP) Subarea Plan (City 2023) and is intended to provide the City with information necessary to assess potentially significant impacts to biological resources under the California Environmental Quality Act (CEQA).

1.0 INTRODUCTION

The proposed project is located on an approximately 2.07-acre parcel (Assessor's Parcel Number [APN] 384-470-09) at 10756 Rockvill Street in the southeastern portion of the City (Attachment 1: Figure 1). It is situated within the U.S. Geological Survey (USGS) 7.5-minute El Cajon quadrangle (USGS 1996; Attachment 1: Figure 2). It is located approximately 350 feet west of State Route (SR) 67, 600 feet south of Woodside Avenue, 700 feet east of Magnolia Avenue, and 1,600 feet north of SR-52 (Attachment 1: Figure 3). The proposed project area lies within the boundaries of the City's draft Subarea Plan but is not located within the Uplands Standards Area of the Santee Preserve or any other existing or proposed conservation area identified by the plan.

The proposed project involves the construction of an approximately 20,000-square-foot building with a 4,631-square-foot mezzanine floor for general commercial/light industrial uses. Proposed project construction will also include a parking lot, staging and loading area, drive lanes, and an approximately 15-foot-high crib wall along the east side of the lot that will require cutting into the slope (Attachment 1: Figure 5). In addition, the slope to the east of the proposed development would be revegetated with native vegetation. It is assumed additional associated appurtenances (e.g., flatwork, fences/walls) will be constructed as part of the development. Construction of the proposed project is anticipated to span approximately 12 months.

2.0 RELEVANT REGULATIONS

Applicable federal, state, and/or regional programs and regulations that apply to biological resources on the proposed project area are summarized below.

2.1 Federal Regulations

The federal Endangered Species Act (ESA), administered by the U.S. Fish and Wildlife Service (USFWS), provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction, and regulates the 'take' of these species and the habitats upon which they rely.

The federal Migratory Bird Treaty Act (MBTA) protects native migratory birds and their nests and eggs. Typical acceptable requirements include nesting bird surveys during the avian breeding season (February 15 to August 31) and avoidance measures if nesting birds are discovered within or adjacent to a project.

2.2 State Regulations

CEQA requires an environmental review for projects with potentially adverse impacts on the environment. Adverse environmental impacts are typically avoided, minimized, or mitigated in accordance with state laws and regulations.

The California ESA, administered by the California Department of Fish and Wildlife (CDFW), provides the legal framework for the listing and protection of species (and their habitats) within California that are identified as being endangered or threatened with extinction.

California Fish and Game Code (CFG) Sections 3503 and 3503.5 make it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or raptor (hawks, falcons, and other birds of prey). CFG Section 3511 makes it unlawful to take or possess any bird designated as Fully Protected unless specifically authorized for scientific purposes. Other provisions of the CFG provide protections for resident and non-resident game birds (sections 3504, 3508, 3514, and 3515), as well as egrets, osprey (Section 3505).

The California Natural Community Conservation Planning (NCCP) program, administered by CDFW, is a cooperative effort by the CDFW and numerous public and private partners that takes a broad-scale, ecosystem approach to planning for the protection and perpetuation of biological diversity throughout California by protecting both habitats and the species within these habitats while also accommodating compatible land use. The County of San Diego MSCP Plan (MSCP Plan; City of San Diego 1998) is part of this NCCP program and discussed in further detail Section 2.3, below.

2.3 Regional Programs and Regulations

Applicable regional programs and regulations are described below.

County of San Diego MSCP Plan

The proposed project area is located within the boundaries of the MSCP Plan (City of San Diego 1998), a multi-jurisdictional habitat conservation planning program that encompasses 582,243 acres of land within unincorporated portions of the County of San Diego (County) as well as the City and other local jurisdictions in the southwestern portion of the County. Local jurisdictions and special districts implement the MSCP Plan for their respective

portions through subarea plans. An objective of the MSCP Plan is to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. The MSCP Plan designates regional preserves, classified as the Multi-Habitat Planning Area (MHPA), that conserve sensitive vegetation communities and undeveloped land to sustain the MSCP-covered plant and wildlife species while allowing development of other areas subject to MSCP requirements. The MSCP Plan targets 171,917 acres within the MHPA for conservation and a total of 85 sensitive plant and animal species are “covered” by the MSCP Plan, 15 of which are also listed as “Narrow Endemic Species” that have restricted geographic distributions, soil affinities, and/or habitats within the region. The MSCP Plan allows incidental take of threatened and endangered species under specific conditions; however, impacts to Narrow Endemic Species are to be avoided to the maximum extent practicable.

Draft City of Santee Subarea Plan

The City is currently participating in the MSCP and has prepared a draft Subarea Plan (Subarea Plan; City 2023). The draft Subarea Plan seeks coverage for a total of 20 sensitive plant and wildlife species. Implementation of the draft Subarea Plan proposes to conserve approximately 3,060 acres (67.8 percent) of the remaining natural habitat within the jurisdictional boundaries of the City. The draft Subarea Plan has not been adopted by the City and implementing agreements with CDFW and USFWS have not been signed. Consequently, incidental take permits currently cannot be issued under the draft Subarea Plan; however, it is used by the City to guide impact analysis and identification of mitigation programs to reduce proposed project impacts to below a level of significance. Until the draft Subarea Plan is officially adopted, proposed projects must comply with other state and federal regulations, and project proponents must coordinate with CDFW and/or USFWS to obtain incidental take permits for their projects. The proposed project area is not located within any preserve area identified in the draft Subarea Plan nor is it in a Core Biological Resources Area or Linkage identified in the MSCP Plan.

Santee Municipal Code

The City’s municipal code requires that all new developments, subdivisions, or tracts that are planned in Fire Hazard Severity Zones (FHSZ) and/or Wildland Urban Interface (WUI) areas shall have a minimum of 100 horizontal FMDS between structures and wildland areas. The proposed project area is not located within either a FHSZ or WUI, so no FMDS is required or proposed.

3.0 METHODS AND SURVEY LIMITATIONS

Prior to conducting the field survey, BBS reviewed the existing literature and historical databases for available biological information and records of occurrence of sensitive biological resources within 1 mile of the proposed project area (Google Earth 2021; USGS 2021; U.S. Department of Agriculture [USDA] 2021; CDFW 2021a; California Native Plant Society [CNPS] 2021; Nationwide Environmental Title Research, LLC 2021).

A biological reconnaissance survey was conducted within the approximately 2.07-acre proposed project area plus an approximately 3.85-acre, 100-foot survey buffer. The

purpose of the biological reconnaissance survey was to document the existing biological resources on-site, assess the survey area for the potential to support sensitive biological resources, and assess the survey area for potential impacts that could occur to sensitive biological resources from implementation of the proposed project.

The biological reconnaissance survey was conducted on foot and with the aid of binoculars for areas within the survey area that were inaccessible on foot. During the biological reconnaissance survey, BBS mapped vegetation communities by hand onto aerial imagery; recorded plant and wildlife species observed directly and/or detected indirectly through sign (e.g., scat, tracks, burrows, vocalization); assessed the survey area for any potential sensitive wildlife habitats; and assessed the survey area for the presence of potentially jurisdictional resources. In addition, representative digital photographs were taken within the survey area. The photographs are included in Attachment 2, and the photo points are shown on Attachment 1: Figure 4.

Vegetation community names follow modified versions of those described in Holland (1986) and Oberbauer (2008). Plant names follow *The Jepson manual: vascular plants of California, Second Edition* (Baldwin et al. 2012), and wildlife species names follow those presented in the most recent CDFW Special Animals List (CDFW 2021b). The hand-drawn vegetation community and land cover type boundaries were digitized in the office using Geographic Information Systems (GIS) software. Computer Aided Design (CAD) files of the proposed project design were overlaid onto the vegetation map via GIS to analyze potential proposed project impacts.

The survey results presented in the following section reflect existing conditions at the time of the biological reconnaissance survey, which can naturally change seasonally and from year to year. Limitations to the compilation of comprehensive plant and animal species lists were imposed by seasonal factors. BBS was on-site for approximately 1.5 hours in the summer and did not conduct focused surveys or walk transects within the survey area; therefore, the lists of plant and wildlife species include species observed and detected during the biological reconnaissance survey but are not intended to be extensive or all-inclusive.

4.0 RESULTS

BBS principal biologist, Darin Busby, conducted the biological reconnaissance survey on August 31, 2021, between the hours of 1300 and 1430. Weather conditions during the survey included temperatures ranging from 79 to 81 degrees Fahrenheit, wind speeds ranging from 0 to 3 miles per hour, cloud cover ranging from 75 to 90 percent, and no precipitation.

The following sections describe the physical characteristics, the general botanical resources, the general zoological resources, and the sensitive biological resources observed and/or detected within the survey area and provide an assessment of the potential for sensitive Narrow Endemic plant species and sensitive species to occur within the proposed project area.

4.1 Physical Characteristics

The survey area occurs on disturbed, undeveloped land that is zoned for general commercial and light industrial use. Based on historical aerial photographs, the survey area and surrounding land appears to have been entirely or almost entirely graded and/or disturbed sometime around 1980. The proposed project area is bordered to the north, west, and south by commercial/light industrial and residential development and to the east by undeveloped land leading up a steep slope (50 to 80 percent slope) to a graded pad and SR-67 (Attachment 1: Figure 3). The survey area ranges in elevation from approximately 396 feet above mean sea level (amsl) in the west to approximately 448 amsl in the east (Attachment 1: Figure 2). According to USDA Natural Resources Conservation Service (NRCS) soil survey maps (USDA 2021), the proposed project area contains Visalia sandy loam, 9 to 15 percent slopes, and Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded.

4.2 Botanical Resources - Flora

Three vegetation communities/land cover types occur within the survey area: disturbed Diegan coastal sage scrub, disturbed habitat, and urban/developed land (Attachment 1: Figure 4). These vegetation communities/land cover types are summarized in Table 1 and are described below. Photographs of these vegetation communities are included in Attachment 2.

Table 1. Vegetation Communities and Land Cover Types

Vegetation Community/ Land Cover Type	Total in Proposed Project Area	Total in 100-foot Survey Buffer	Total
Disturbed Diegan Coastal Sage Scrub	0.57	0.70	1.27
Disturbed Habitat	0.34	0.66	0.99
Urban/Developed Land	1.17	2.49	3.66
Total	2.08	3.85	5.92

A total of 27 plant species were observed within these vegetation communities, including 20 species (74 percent) that are considered non-native and/or naturalized into the area, and 7 species (26 percent) that are considered native (Attachment 3). None of the plants observed are considered sensitive plant species.

Disturbed Diegan Coastal Sage Scrub (Oberbauer Code 32510, Updated Holland Code 32500)

Disturbed Diegan coastal sage scrub is a sensitive vegetation community consisting mainly of low sub-shrubs (approximately 3 feet high), many of which are drought-deciduous. A total of approximately 1.27 acres of Diegan coastal sage scrub occurs within the survey area, including 0.57 acre within the proposed project area and 0.70 acre in the 100-foot survey buffer (Attachment 1: Figure 4). This vegetation community occurs on a steep slope along the eastern boundary of the proposed project area and survey buffer and is characterized by a scattered covering of native species, such as California sagebrush (*Artemisia californica*), broom baccharis (*Baccharis sarothroides*), and coast California buckwheat (*Eriogonum fasciculatum* var. *fasciculatum*), and non-native species, such as brittlebush (*Encelia farinosa*), London rocket (*Sisymbrium irio*), Italian thistle (*Carduus*

pycnocephalus), and tocalote (*Centaurea melitensis*). Brittlebush is native to southern California, but does not naturally occur in the project vicinity, suggesting it was historically planted on-site. This vegetation community appears to have been disturbed by previous vegetation clearing and trash dumping, resulting in encroachment of a high percentage of non-native plant species.

Disturbed Habitat (Oberbauer Code 11300, No Holland Code)

Disturbed habitat is a common land cover type that includes areas that have been physically disturbed by previous human activity and are no longer recognizable as a native or naturalized vegetation association. A total of approximately 0.99 acre of disturbed habitat occurs within the survey area, including 0.34 acre within the proposed project area and 0.66 acre in the 100-foot survey buffer (Attachment 1: Figure 4). Within the survey area, the disturbed habitat includes areas with sparse, weedy vegetation associated with the previously cleared but undeveloped northern portion of the proposed project area and nearby unpaved dirt trails within the surrounding undeveloped areas. This land cover type is dominated by bare ground and sparse, weedy, non-native species, such as London rocket, Italian thistle, tocalote, Russian thistle (*Salsola tragus*), black mustard (*Brassica nigra*), and tree tobacco (*Nicotiana glauca*).

Urban/Developed Land (Oberbauer Code 12000; No Holland Code)

Urban/developed land is a common land cover type that includes areas of hardscape, areas where permanent or semi-permanent structures have been constructed, and areas where native vegetation is no longer supported. This land cover type also includes unvegetated areas and vegetated landscaped areas with ornamental plants that often require irrigation. A total of approximately 3.66 acres of urban/developed land occurs in the survey area, including 1.17 acres within the proposed project area and 2.49 acres in the 100-foot survey buffer (Attachment 1: Figure 4). This land cover type occurs in the central and western portions of the proposed project area and survey buffer and includes permanent structures, pavement, a dirt lot, and landscaped areas with and without irrigation. The urban/developed land on-site is either devoid of vegetation or is dominated by non-native species, such as hottentot fig (*Carpobrotus edulis*), Brazilian pepper tree (*Schinus terebinthifolius*), giant bird of paradise (*Strelitzia nicola*), blue gum (*Eucalyptus globulus*), red gum (*Eucalyptus camaldulensis*), and pines (*Pinus spp.*)

4.3 Zoological Resources - Fauna

A total of 12 wildlife species were observed and/or detected (Attachment 4) within the survey area, including fiery skipper (*Hylephila phyleus*), gray hairstreak (*Strymon melinus pudica*), house finch (*Carpodacus mexicanus*), lesser goldfinch (*Spinus psaltria*), bushtit (*Psaltriparus minimus*), house sparrow (*Passer domesticus*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), rock pigeon (*Columba livia*), California towhee (*Pipilo crissalis*), Bewick's wren (*Thyromanes bewickii*), and domestic dog (*Canis familiaris*). Most of these wildlife species are common in developed environments, and none is considered sensitive species.

4.4 Sensitive Biological Resources

The survey area was assessed for sensitive biological resources, including sensitive vegetation communities, sensitive plant and wildlife species, wildlife movement corridors and nursery sites, and jurisdictional resources. Assessments for the potential for occurrence of sensitive biological resources are based upon known ranges; habitat preferences for the species; and historical species occurrence records from the California Natural Diversity Database (CNDDDB; CDFW 2021a), the USFWS all-species occurrence database (USFWS 2021), and SanBIOS databases (County of San Diego 2021). The following sections provide definitions for each of these sensitive biological resources and describe the sensitive biological resources that are known to occur or have a potential to occur within and/or adjacent to the proposed project area.

Sensitive Vegetation Communities

Sensitive vegetation communities are vegetation assemblages, associations, subassociations, or land cover types that have cumulative losses throughout the region, have relatively limited distribution, support or potentially support sensitive species, have particular value to other wildlife, or are considered sensitive by the resource agencies. Sensitive vegetation communities are regulated by various local, state, and federal resource agencies. Under the MSCP, wetland vegetation communities and rare/uncommon upland vegetation communities are considered sensitive, while common upland vegetation communities are not considered sensitive.

The survey area contains one sensitive vegetation community, disturbed Diegan coastal sage scrub (Attachment 1: Figures 3 and 4).

Sensitive Plants

For purposes of this report, sensitive plant species include those that are (1) listed as threatened or endangered or proposed for listing by federal or state agencies; (2) California Rare Plant Ranks (CRPR) List 1 or List 2 (CNPS 2021); or (3) considered rare, endangered, or threatened by CDFW (CDFW 2021c) or other local conservation organizations or specialists (includes MSCP-covered species and Narrow Endemic Species). Noteworthy plant species are considered to be those that are CRPR List 3 or List 4 (CNPS 2021).

No sensitive plant species were observed or are expected to occur within the survey area. Attachment 5 provides an evaluation of the potential for occurrence for 19 sensitive plant species that have historically been reported from the vicinity of the proposed project area based on the literature review and database search conducted for the proposed project area (County of San Diego 2021, CDFW 2021a, CNPS 2021). No sensitive plant species have a moderate or high potential for occurrence based on a lack of suitable habitat, prevalence of developed/disturbed conditions, lack of historical or known occurrences within and adjacent to the proposed project area, and/or the small size of the anticipated impact area within already developed and disturbed areas.

Sensitive Wildlife

For purposes of this report, sensitive wildlife species include those that are (1) listed as threatened or endangered or proposed for listing by USFWS or CDFW; (2) designated as

“fully protected” by CDFW, (3) considered “species of special concern” by CDFW, and/or (4) considered “taxa to watch” by CDFW (CDFW 2021b). In addition, species included on the MSCP-covered species list are also included as sensitive species. Species that are covered by the federal MBTA were also considered. As the list of species covered under the MBTA is extensive, these species are not included in the sensitive wildlife species table. However, they are addressed further in the impact analysis, below.

No sensitive wildlife species were observed or detected, and none are anticipated to occur within or immediately adjacent to the proposed project area. Attachment 6 provides an evaluation of the potential for occurrence for the 13 sensitive wildlife species that have historically been reported from the vicinity of the proposed project area based on the literature review and database search conducted for the proposed project (County of San Diego 2021, CDFW 2021a, USFWS 2021). No sensitive wildlife species have a moderate or high potential occur based on a lack of suitable habitat, prevalence of developed/disturbed conditions, lack of connectivity to surrounding suitable habitat, lack of historical or known occurrences within and adjacent to the proposed project area, and/or the small size of the anticipated impact area within already developed land.

Particular attention was paid to habitat suitability for coastal California gnatcatcher (*Polioptila californica californica*) during the biological reconnaissance survey. Coastal California gnatcatcher is a federally threatened species and a state species of special concern that is known to occur in moderate- or high-quality Diegan coastal sage scrub. There are numerous records of coastal California gnatcatcher within 1 mile of the proposed project area, most of which occur in the vicinity of the Sky Ranch residential development, approximately 0.5 mile east of the proposed project. The nearest record is approximately 600 feet east of the proposed project area, along the east side of SR-67. The disturbed Diegan coastal sage scrub on and adjacent to the proposed project area is highly disturbed, has a high percentage of non-native, weedy vegetation, and contains areas that are disturbed from previous clearing activities. Therefore, coastal California gnatcatcher is not expected to occur, and focused, protocol surveys are not recommended.

Raptors are not expected to nest in the gum and pine trees within and adjacent to the survey area. All of these trees are too small and isolated from other more substantial patches of trees to provide high quality raptor nesting habitat. However, other avian species covered by the MBTA and CFGC Section 3503 have the potential to occur within and adjacent to the proposed project area.

Jurisdictional Resources

Jurisdictional resources are considered sensitive biological resources and are regulated by the U.S. Army Corps of Engineers (USACE), CDFW, Regional Water Quality Control Board (RWQCB), and/or the City pursuant to several federal, state, and local laws and regulations.

No potentially jurisdictional drainages, wetlands, or wetland indicators (i.e., wetland vegetation, ordinary high water mark, streambed, stream bank, channel) were observed within the survey area during the biological reconnaissance survey.

Wildlife Movement, Corridors, and Nursery Sites

Wildlife corridors are essential to maintain populations of healthy and genetically diverse plant and wildlife species. Wildlife corridors are considered sensitive by local, state, and federal resource and conservation agencies, because these corridors allow wildlife to move between adjoining open space areas that are becoming increasingly isolated as open space becomes fragmented from urbanization, rugged terrain, and/or changes in vegetation (Beier and Loe 1992). The proposed project has been historically graded and is dominated by disturbed habitat and urban/developed land. The native Diegan coastal sage scrub habitat on site is highly disturbed and provides only marginal quality habitat for native wildlife. In addition, the proposed project area is bounded to the north, west, and south by developed areas and to the east by SR-67. Consequently, wildlife species are not anticipated to use the proposed project area or adjacent areas for regional movement. In addition, the proposed project area and surrounding survey buffer do not occur in a Core Biological Resource Area or Linkage (City of San Diego 1998), and they do not serve as a regional or local wildlife movement corridor since the survey area is almost entirely surrounded by disturbed and development land.

Wildlife nursery sites are areas where wildlife species regularly breed or rear young. Nursery sites may include rookeries, where large numbers of aquatic birds congregate to nest, or areas where large mammals such as deer give birth and breed. There are no known rookeries located within or near the proposed project area. Additionally, the proposed project area is highly disturbed and does not provide sufficient vegetation cover for large wildlife species to use for birthing or rearing young.

Conservation or Preserve Areas

The proposed project area is not located within or adjacent to any conservation or preserve areas identified in the MSCP Plan (City of San Diego 1998) or draft Subarea Plan (City 2023).

5.0 PROJECT IMPACT ANALYSIS

This section addresses the potential impacts to biological resources that could result from implementation of the proposed project and assesses the potential significance of each impact.

The potential significance of proposed project impacts was assessed according to Appendix G of the 2021 CEQA Statutes & Guidelines (Association of Environmental Professionals [AEP] 2021). These thresholds of significance were established to determine whether a project would result in a “significant effect”, which is defined as a “substantial or potentially substantial adverse change in the environment.” Potential proposed project impacts to biological resources are evaluated by City staff during the environmental review process to assure compliance with CEQA and the City’s draft MSCP Subarea Plan (City of Santee 2023). Under CEQA, a project would be considered to have significant biological impacts if they would have a substantial adverse effect on sensitive plant or animal species, native or naturalized vegetation communities, riparian habitats or jurisdictional waters, or wildlife movement or corridors; or conflict with any local policy, habitat conservation plan, or NCCP (AEP 2021).

5.1 Sensitive Vegetation Communities

The proposed project would impact 1.63 acres of the 2.08-acre proposed project area (Table 2; Attachment 1: Figure 5). The remaining habitat on the eastern slope would be revegetated and is not considered impacted. Proposed project impacts to disturbed Diegan coastal sage scrub would be considered significant by the City unless offset through avoidance, minimization, and/or mitigation measures (see Section 6, below). Proposed impacts to disturbed habitat and urban/developed land would not be considered significant by the City and, therefore, would not require any avoidance, minimization, and/or mitigation measures. As such, these impacts are not discussed further in this document.

Table 2. Impacts to Vegetation Communities and Land Cover Types (Acres)

Vegetation Community/ Land Cover Type	Total in Proposed Project Area	Impacts
Disturbed Diegan Coastal Sage Scrub	0.57	0.27
Disturbed Habitat	0.34	0.23
Urban/Developed Land	1.17	1.13
Total	2.08	1.63

5.2 Sensitive Plants

No sensitive plant species are expected to occur on or adjacent to the proposed project area; therefore, implementation of the proposed project would not result in impacts to sensitive plant species. As such, no avoidance, minimization, and/or mitigation measures would be required, and sensitive plant species are not discussed further in this document.

5.3 Sensitive Wildlife

No sensitive wildlife species are expected to occur on or adjacent to the proposed project area; therefore, implementation of the proposed project would not result in impacts to sensitive wildlife species. As such, no avoidance, minimization, and/or mitigation measures would be required, and sensitive plant species are not discussed further in this document.

The proposed project area has potential to support nesting migratory birds protected by the MBTA and CFGC Section 3503. Therefore, avoidance measures (see Section 6, below) would be required to prevent potentially significant impacts to nesting migratory birds. Raptor species protected by the MBTA and CFGC Section 3503.5 are not expected to nest within or adjacent to the proposed project area; therefore, no impacts to nesting raptors are anticipated, and no additional avoidance, minimization, or mitigation measures would be required. As such, these are not discussed further in this document.

5.4 Jurisdictional Resources

No locally, state-, or federally protected jurisdictional resources occur on or adjacent to the proposed project area. Therefore, implementation of the proposed project would not result in impacts to jurisdictional resources. As such, no avoidance, minimization, and/or

mitigation measures would be required, and jurisdictional resources are not discussed further in this document.

5.5 Wildlife Movement, Corridors, and Nursery Sites

The proposed project area is not located within a Core Biological Resource Area or Linkage, and it does not support any wildlife nursery sites. Therefore, implementation of the proposed project would not result in impacts to these resources. As such, no avoidance, minimization, and/or mitigation measures would be required, and wildlife movement, corridors, and nursery sites are not discussed further in this document.

5.6 Conservation or Preserve Areas

The proposed project is not located within or adjacent to any conservation or preserve areas. Therefore, implementation of the proposed project would not result in impacts to established preserve areas, and the adjacency guidelines from Section 7.2.4.6 of the draft Subarea Plan would not apply. As such, no avoidance, minimization, and/or mitigation measures would be required, and conservation and preserve areas are not discussed further in this document.

6.0 AVOIDANCE AND MINIMIZATION MEASURES AND STANDARD PROJECT CONDITIONS

As an infill project, the proposed project has been determined by the City to qualify for a Class 32 Categorical Exemption under CEQA. Therefore, no mitigation is required, provided the project complies with the standard project conditions discussed below. These conditions are intended to reduce project impacts to a level of less than significant under CEQA and to ensure compliance with state and federal regulations, as well as the MSCP Plan (County 1998) and the City's draft Subarea Plan (City 2023).

6.1 Sensitive Vegetation Communities

The proposed project would impact 0.27 acre of disturbed Diegan coastal sage scrub. In accordance with the draft Subarea Plan, impacts to less than 1 acre of Diegan coastal sage scrub may be offset at a 1:1 ratio, or 0.27 acre. This may occur through one of the following options:

1. Purchase and preservation of land supporting a minimum of 0.27 acre of Diegan coastal sage scrub at a location to be approved by the City and Wildlife Agencies (i.e., CDFW, USFWS). This land would then be established as a preserve within the City's Subarea Plan Preserve System and managed in perpetuity, which would likely require preparation of a long-term management plan and establishment of a non-wasting endowment to fund the long-term management.
2. Because the site is not within the Uplands Standards Area of the Santee Preserve, is not within the reserve system, and the Subarea Plan has not yet been adopted, mitigation may be achieved through acquisition of 0.27 acre of Diegan coastal sage scrub credits at a conservation bank approved by the City and Wildlife Agencies (i.e., CDFW, USFWS). As there are no conservation banks with coastal sage scrub

credits within the City, it may be necessary to acquire credits outside the City limits. Coastal sage scrub credits are available at the San Miguel Conservation Bank, approximately 10 miles to the south and Willow Road Conservation Bank, approximately 5 miles to the northeast of the project site.

6.2 Sensitive Wildlife

To prevent potentially significant impacts to migratory birds protected by the MBTA and CFGC Section 3503 to the maximum extent feasible, the start of construction activities (e.g., fence installation, equipment staging, clearing or grubbing of vegetation, grading) should occur outside the migratory bird breeding season (February 15 to August 31).

If construction activities must start during the breeding season, a qualified biologist would conduct a pre-construction nesting bird survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted no more than 7 calendar days prior to the start of construction activities.

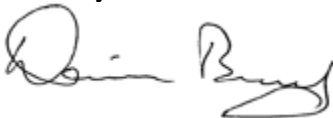
If no nesting birds are detected in the proposed area of disturbance, no further measures will be required. However, if nesting birds are detected within the proposed area of disturbance, a construction avoidance buffer around the nests would be required to prevent potential impacts to the nest. The buffer distance would be determined based on the species nesting. No removal of vegetation within the avoidance buffer may occur until the end of the breeding season or the nest is no longer active, whichever comes first.

7.0 CONCLUSION

With implementation of the Standard Project Conditions described above, all impacts to sensitive biological resources would be avoided or reduced to below a level of significance.

Please contact me at darin@busbybiological.com or 858.334.9508 if you have any questions or concerns regarding this letter report. Please see Attachment 7 for a summary of the preparers' qualifications.

Sincerely,



Darin Busby
Principal Biologist

ATTACHMENTS

Attachment 1: Figures

Attachment 2: Representative Project Site Photographs

Attachment 3: Plant Species Observed

Attachment 4: Wildlife Species Detected

Attachment 5: Sensitive Plant Species Analyzed for Potential for Occurrence

Attachment 6: Sensitive Wildlife Species Analyzed for Potential for Occurrence

Attachment 7: Summary of Preparer's Qualifications

REFERENCES

Association of Environmental Professionals

2021 2021 California Environmental Quality Act (CEQA) Statute & Guidelines.

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2021 *Inventory of Rare and Endangered Vascular Plants of California* from
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2023 Draft Santee Multiple Species Conservation Program Subarea Plan.

United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS)

2021 Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. *Official Soil Series Descriptions*. Available at: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed September.

United States Fish and Wildlife Service (USFWS)

2021 All Species Occurrences GIS Database. Carlsbad Fish and Wildlife Office. Accessed September.

United States Geological Survey (USGS)

1996 El Cajon 7.5-minute quadrangle.

ATTACHMENT 1
Figures

ATTACHMENT 2
Representative Project Site Photographs



Photograph 1. View of the project area from the southwest corner (Facing northeast; updated photograph provided by Southwest Signal Service on January 13, 2022).



Photograph 2. View of the project area from the southern boundary. Urban/developed land is present within the graded pad dominating the site (Facing north; updated photograph provided by Southwest Signal Service on January 13, 2022).



Photograph 3. View of disturbed Diegan coastal sage scrub on the eastern slope in the southern portion of the project area (Facing north; August 31, 2021).



Photograph 4. View of the graded pad in the central portion of the site (Facing west; updated photograph provided by Southwest Signal Service on January 13, 2022).



Photograph 5. View of the disturbed Diegan coastal sage scrub (on the right), disturbed habitat (in the background), and debris piles in urban/developed land (foreground) in the east-central portion of the site (Facing north; updated photograph provided by Southwest Signal Service on January 13, 2022).



Photograph 6. View of urban/develop land on the graded pad (foreground) and disturbed Diegan coastal sage scrub (on the left) in the northern portion of the site (Facing southeast; updated photograph provided by Southwest Signal Service on January 13, 2022).



Photograph 7. Overview of the project area from the western boundary. The graded pad is in the foreground and slopes with disturbed Diegan coastal sage scrub in the background (Facing east; August 31, 2021).



Photograph 8. View of western boundary of the project area, with the disturbed habitat on the small slope to the left and urban/developed land on the graded pad to the right (Facing north; August 31, 2021).

ATTACHMENT 3
Plant Species Observed

Attachment 3. Plant Species Observed

Family	Scientific Name*	Common Name	Vegetation Community
Aizoaceae	<i>Carpobrotus edulis</i> *	hottentot-fig	DEV
Anacardiaceae	<i>Schinus terebinthifolius</i> *	Brazilian pepper tree	DEV
Arecaceae	<i>Washingtonia robusta</i> *	Mexican fan palm	DEV
Asteraceae	<i>Baccharis sarothroides</i>	broom baccharis	DIST
Asteraceae	<i>Carduus pycnocephalus</i> *	Italian thistle	CSS-d, DIST
Asteraceae	<i>Centaurea melitensis</i> *	tocalote	CSS-d, DIST, DEV
Asteraceae	<i>Dittrichia graveolens</i> *	stinkwort	CSS-d, DIST, DEV
Asteraceae	<i>Encelia californica</i>	California encelia	CSS-d
Asteraceae	<i>Encelia farinosa</i>	brittlebush	CSS-d
Asteraceae	<i>Pseudognaphalium californicum</i>	California everlasting	DIST
Brassicaceae	<i>Brassica nigra</i> *	black mustard	DIST
Brassicaceae	<i>Sisymbrium irio</i> *	London rocket	CSS-d, DIST
Chenopodiaceae	<i>Salsola tragus</i> *	Russian thistle	DIST, DEV
Euphorbiaceae	<i>Chamaesyce maculata</i> *	spotted spurge	DIST, DEV
Euphorbiaceae	<i>Croton setigerus</i>	dove weed	DIST, DEV
Fabaceae	<i>Acacia</i> sp.*	acacia	DEV
Lamiaceae	<i>Marrubium vulgare</i> *	horehound	DIST, DEV
Myrsinaceae	<i>Lysimachia arvensis</i> *	scarlet pimpernel	DIST
Myrtaceae	<i>Eucalyptus globulus</i> *	blue gum	DEV
Pinaceae	<i>Pinus</i> spp.*	pinus	DEV
Polygonaceae	<i>Eriogonum fasciculatum</i> ssp. <i>fasciculatum</i>	California buckwheat	CSS-d, DIST
Solanaceae	<i>Nicotiana glauca</i> *	tree tobacco	DIST
Strelitziaceae	<i>Strelitzia nicolai</i> *	giant bird of paradise	DEV

*Non-native species

Vegetation Community

CSS-d: Diegan coastal sage scrub (disturbed)

DIST: disturbed habitat

DEV: urban/developed

ATTACHMENT 4
Wildlife Species Detected

Attachment 4. Wildlife Species Detected

Taxon		Scientific Name	Common Name	Vegetation Community	Evidence of Occurrence
Order	Family				
INVERTEBRATES					
Lepidopterans					
Lepidoptera	Hesperiidae	<i>Hylephila phyleus muertovalle</i>	fiery skipper	CSS-d	O
Lepidoptera	Lycaenidae	<i>Strymon melinus pudica</i>	gray hairstreak	DIST	O
VERTEBRATES					
Birds					
Columbiformes	Columbidae	<i>Columba livia</i>	rock pigeon	DEV	O
Columbiformes	Columbidae	<i>Zenaida macroura</i>	mourning dove	DIST, DEV	O
Passeriformes	Corvidae	<i>Corvus corax</i>	common raven	N/A	F
Passeriformes	Fringillidae	<i>Haemorhous mexicanus</i>	house finch	DIST, DEV	O, V
Passeriformes	Fringillidae	<i>Spinus psaltria</i>	lesser goldfinch	DEV	V
Passeriformes	Aegithalidae	<i>Psaltriparus minimus</i>	bushtit	CSS-d	V
Passeriformes	Passeridae	<i>Passer domesticus</i>	house sparrow	DEV	O
Passeriformes	Passerellidae	<i>Melospiza crissalis</i>	California towhee	CSS-d	O, V
Passeriformes	Troglodytidae	<i>Thryomanes bewickii</i>	Bewick's wren	CSS-d	O, V
Mammals					
Carnivora	Canidae	<i>Canis familiaris</i>	domestic dog	DEV	T

Vegetation Community

CSS-d: Diegan coastal sage scrub (disturbed)
 DIST: disturbed habitat
 DEV: urban/developed

Evidence of Occurrence

F: flying overhead
 O: observed
 T: tracks
 V: vocalization

ATTACHMENT 5
Sensitive Plant Species Analyzed for Potential for Occurrence

Attachment 5. Sensitive Plant Species Analyzed for Potential for Occurrence

SPECIES NAME	STATUS	HABITAT DESCRIPTION	POTENTIAL FOR OCCURRENCE
San Diego thorn-mint (<i>Acanthomintha ilicifolia</i>)	FT SE CRPR 1B.1 MSCP NE	Annual herb. Blooms Apr-Jun. Clay soils associated with vernal pools in chaparral, coastal sage scrub, and grassland. Elev 30-3,150 ft.	Not expected to occur. No suitable vernal pool habitat occurs on site. There are no database records of this species within 2 miles.
Shaw's agave (<i>Agave shawii</i> var. <i>shawii</i>)	CRPR 2B.1 MSCP NE	Leaf succulent. Blooms Sep-May. Coastal bluff scrub, coastal sage scrub. Elev 0-328 ft.	Not expected to occur. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE CRPR 1B.1 MSCP NE	Rhizomatous herb. Blooms Apr-Oct. Often in disturbed areas with sandy loam or clay soils, sometimes alkaline areas, in chaparral, coastal sage scrub, grassland, vernal pools. Elev 164-1,968 ft.	Not expected to occur. Habitat on site is likely too disturbed to support this species. The only record of this species within 2 miles of the project area dates to 1936 and may be a misidentification (CDFW 2021)
Encinitas baccharis (<i>Baccharis vanessae</i>)	FT SE CRPR 1B.1 MSCP NE	Deciduous shrub. Blooms Aug-Nov. Maritime chaparral. Elev 260-2,920ft.	Not expected to occur. Project area is too disturbed to provide suitable habitat for this species. This is a conspicuous shrub and would have been detected if present. There are no database records of this species within 2 miles of the project area.
Nevin's barberry (<i>Berberis nevinii</i>)	FE SE CRPR 1B.1 MSCP NE	Perennial shrub. Blooms Mar-Jun. Coastal sage scrub, chaparral, foothill woodlands. Elev 115-1,575ft.	Not expected to occur. Coastal sage scrub habitat is too disturbed for this species. This is a conspicuous shrub and would have been detected if present. There are no database records of this species within 2 miles of the project area.
Thread-leaf brodiaea (<i>Brodiaea filifolia</i>)	FT SE CRPR 1B.1 MSCP NE	Bulbiferous herb. Blooms May-Jul. Valley grasslands, foothill woodlands, coastal sage scrub, freshwater wetlands, vernal pools. Elev 130-2,820ft.	Not expected to occur. Habitat on site is highly disturbed and largely unsuitable for this species. There are no database records of this species within 2 miles of the project area.

Dunn's mairiposa lily (<i>Calochortus dunnii</i>)	SR CRPR 1B.2 MSCP NE	Bulbiferous herb. Blooms Apr-Jun. Chaparral and pine forests. Elev 855-4,755ft.	Not expected to occur. Coastal sage scrub on site is too disturbed to provide suitable habitat for this species. There are no known database records within 2 miles of the project area.
Lakeside lilac (<i>Ceanothus cyaneus</i>)	CRPR 1B.2 MSCP	Perennial shrub. Blooms Apr-Jun. Slopes and ridges with chaparral. Elev 490-2,725ft.	Not expected to occur. No suitable chaparral habitat is present. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.
Smooth tarplant (<i>Centromadia pungens</i> ssp. <i>laevis</i>)	CRPR 1B.1	Annual herb. Blooms Apr-Sep. Open, poorly drained flats and depressions, disturbed areas, and grasslands. Elev 330-2,000ft.	Not expected to occur. No suitable depressions or flats occur on site. The only record in the project vicinity is population last observed in 2006 within an area that was extirpated by construction of the Santee Trolley Square development approximately one mile to the northeast (CNDDDB 2021)
snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	CRPR 1B.1 MSCP NE	Stem succulent. Blooms Apr-Jul. Sandy soils or sandy loam soils in chaparral and coastal sage scrub. Elev 50-2,525ft.	Not expected to occur. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.
Otay tarplant (<i>Deinandra conjugens</i>)	FT SE CRPR 1B.1 MSCP NE	Annual herb. Blooms May-Jun. Clay soils in grassland and coastal sage scrub. Elev 195-1,015ft. (Calflora 2017, NatureServe 2017)	Not expected to occur. Project area is highly disturbed and no suitable clay soils are present. There are no database records of this species within 2 miles of the project area.
short-leaved dudleya (<i>Dudleya brevifolia</i>)	SE CRPR 1B.1 MSCP NE	Perennial herb. Blooms Apr-May. Sandstone, openings in maritime chaparral, coastal sage scrub. Elev 95-820ft.	Not expected to occur. No maritime chaparral is present and coastal sage scrub on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
Variiegated dudleya (<i>Dudleya variegata</i>)	CRPR 1B.2 MSCP NE	Perennial herb. Blooms Apr-Jun. Clay soils associated with vernal pools in chaparral, foothill woodland, coastal sage scrub, and grassland. Elev 195-3,970ft.	Not expected to occur. No vernal pools are present on site. There are no database records of this species within 2 miles of the project area.

Palmer's goldenbush (<i>Ericameria palmeri</i> var. <i>palmeri</i>)	CRPR 1B.1 MSCP	Evergreen Shrub. Blooms Sep-Nov. Coastal sage scrub. Elev 165-1,705ft.	Not expected to occur. Habitat on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
Gander's pitcher sage (<i>Lepechinia ganderi</i>)	CRPR 1B.3 MSCP NE	Perennial herb. Coniferous forest, chaparral, coastal sage scrub, valley and foothill grasslands Blooms Mar-Jun. Elev 330-3,380ft.	Not expected to occur. No coniferous forest is present and coastal sage scrub on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
felt-leaf monardella (<i>Monardella hypoleuca</i> ssp. <i>lanata</i>)	CRPR 1B.2 MSCP	Perennial herb. Blooms Jun-Aug. Chaparral, rocky and granitic slopes, or hilltops. Elev 985-3,545ft.	Not expected to occur. Site is highly disturbed and does not support suitable chaparral habitat. There are no database records of this species within 2 miles of the project area.
Dehesa nolina (<i>Nolina interrata</i>)	SE CRPR 1B.1 MSCP NE	Perennial herb. Blooms Jun-Jul. Chaparral. Mafic, gabbroic, serpentine soils. Elev 460-2,065ft.	Not expected to occur. Project area does not contain suitable soils. There are no database records of this species within 2 miles of the project area.
white-head cudwood (<i>Pseudognaphalium leucocephalum</i>)	CRPR 2B.2	Perennial herb. Blooms Aug-Nov. Found in sandy washes, dry stream bottoms, within coastal sage scrub and chaparral. Elev 100-4,035ft.	No suitable sandy washes or streams occur on site. Coastal sage scrub on site is highly disturbed. The only nearby record of this species is a 2011 observation within the San Diego River, approximately 0.75 mile to the northwest.
Nuttall's scrub oak (<i>Quercus dumosa</i>)	CRPR 1B.1	Evergreen shrub. Blooms Feb-Apr. Sandy or clay loam soils associated with chaparral and coastal sage scrub. Elev 45-6,855ft.	Not expected to occur. No suitable chaparral occurs on site, and coastal sage scrub is highly disturbed. This is a conspicuous shrub and would have been detected if present.
San Diego thorn-mint (<i>Acanthomintha ilicifolia</i>)	FT SE CRPR 1B.1 MSCP NE	Annual herb. Blooms Apr-Jun. Clay soils associated with vernal pools in chaparral, coastal sage scrub, and grassland. Elev 30-3,150 ft.	Not expected to occur. No suitable vernal pool habitat occurs on site. There are no database records of this species within 2 miles.
Shaw's agave (<i>Agave shawii</i> var. <i>shawii</i>)	CRPR 2B.1 MSCP NE	Leaf succulent. Blooms Sep-May. Coastal bluff scrub, coastal sage scrub. Elev 0-328 ft.	Not expected to occur. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.

San Diego ambrosia (<i>Ambrosia pumila</i>)	FE CRPR 1B.1 MSCP NE	Rhizomatous herb. Blooms Apr-Oct. Often in disturbed areas with sandy loam or clay soils, sometimes alkaline areas, in chaparral, coastal sage scrub, grassland, vernal pools. Elev 164-1,968 ft.	Not expected to occur. Habitat on site is likely too disturbed to support this species. The only record of this species within 2 miles of the project area dates to 1936 and may be a misidentification (CDFW 2021)
Encinitas baccharis (<i>Baccharis vanessae</i>)	FT SE CRPR 1B.1 MSCP NE	Deciduous shrub. Blooms Aug-Nov. Maritime chaparral. Elev 260-2,920ft.	Not expected to occur. Project area is too disturbed for to provide suitable habitat for this species. This is a conspicuous shrub and would have been detected if present. There are no database records of this species within 2 miles of the project area.
Nevin's barberry (<i>Berberis nevinii</i>)	FE SE CRPR 1B.1 MSCP NE	Perennial shrub. Blooms Mar-Jun. Coastal sage scrub, chaparral, foothill woodlands. Elev 115-1,575ft.	Not expected to occur. Coastal sage scrub habitat is too disturbed for this species. This is a conspicuous shrub and would have been detected if present. There are no database records of this species within 2 miles of the project area.
Thread-leaf brodiaea (<i>Brodiaea filifolia</i>)	FT SE CRPR 1B.1 MSCP NE	Bulbiferous herb. Blooms May-Jul. Valley grasslands, foothill woodlands, coastal sage scrub, freshwater wetlands, vernal pools. Elev 130-2,820ft.	Not expected to occur. Habitat on site is highly disturbed and largely unsuitable for this species. There are no database records of this species within 2 miles of the project area.

Dunn's mairiposa lily (<i>Calochortus dunnii</i>)	SR CRPR 1B.2 MSCP NE	Bulbiferous herb. Blooms Apr-Jun. Chaparral and pine forests. Elev 855-4,755ft.	Not expected to occur. Coastal sage scrub on site is too disturbed to provide suitable habitat for this species. There are no known database records within 2 miles of the project area.
Likeside lilac (<i>Ceanothus cyaneus</i>)	CRPR 1B.2 MSCP	Perennial shrub. Blooms Apr-Jun. Slopes and ridges with chaparral. Elev 490-2,725ft.	Not expected to occur. No suitable chaparral habitat is present. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.
Smooth tarplant (<i>Centromadia pungens</i> ssp. <i>laevis</i>)	CRPR 1B.1	Annual herb. Blooms Apr-Sep. Open, poorly drained flats and depressions, disturbed areas, and grasslands. Elev 330-2,000ft.	Not expected to occur. No suitable depressions or flats occur on site. The only record of this species in the project vicinity is a 2006 observation within an area that was extirpated by construction of the Santee Trolley Square development. approximately one mile to the northeast (CNDDDB 2021)
snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	CRPR 1B.1 MSCP NE	Stem succulent. Blooms Apr-Jul. Sandy soils or sandy loam soils in chaparral and coastal sage scrub. Elev 50-2,525ft.	Not expected to occur. This is a conspicuous species and would have been detected if present on site. There are no database records of this species within 2 miles of the project area.
Otay tarplant (<i>Deinandra conjugens</i>)	FT SE CRPR 1B.1 MSCP NE	Annual herb. Blooms May-Jun. Clay soils in grassland and coastal sage scrub. Elev 195-1,015ft. (Calflora 2017, NatureServe 2017)	Not expected to occur. Project area is highly disturbed and no suitable clay soils are present. There are no database records of this species within 2 miles of the project area.
short-leaved dudleya (<i>Dudleya brevifolia</i>)	SE CRPR 1B.1 MSCP NE	Perennial herb. Blooms Apr-May. Sandstone, openings in maritime chaparral, coastal sage scrub. Elev 95-820ft.	Not expected to occur. No maritime chaparral is present and coastal sage scrub on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
Variiegated dudleya (<i>Dudleya variegata</i>)	CRPR 1B.2 MSCP NE	Perennial herb. Blooms Apr-Jun. Clay soils associated with vernal pools in chaparral, foothill woodland, coastal sage scrub, and grassland. Elev 195-3,970ft.	Not expected to occur. No vernal pools are present on site. There are no database records of this species within 2 miles of the project area.

Palmer's goldenbush (<i>Ericameria palmeri</i> var. <i>palmeri</i>)	CRPR 1B.1 MSCP	Evergreen Shrub. Blooms Sep-Nov. Coastal sage scrub. Elev 165-1,705ft.	Not expected to occur. Habitat on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
Gander's pitcher sage (<i>Lepechinia ganderi</i>)	CRPR 1B.3 MSCP NE	Perennial herb. Coniferous forest, chaparral, coastal sage scrub, valley and foothill grasslands Blooms Mar-Jun. Elev 330-3,380ft.	Not expected to occur. No coniferous forest is present and coastal sage scrub on site is highly disturbed. There are no database records of this species within 2 miles of the project area.
Dehesa nolina (<i>Nolina interrata</i>)	SE CRPR 1B.1 MSCP NE	Perennial herb. Blooms Jun-Jul. Chaparral. Mafic, gabbroic, serpentine soils. Elev 460-2,065ft.	Not expected to occur. Project area does not contain suitable soils. There are no database records of this species within 2 miles of the project area.
white-head cudwood (<i>Pseudognaphalium leucocephalum</i>)	CRPR 2B.2	Perennial herb. Blooms Aug-Nov. Found in sandy washes, dry stream bottoms, within coastal sage scrub and chaparral. Elev 100-4,035ft.	Not expected to occur. No suitable sandy washes or streams occur on site. Coastal sage scrub on site is highly disturbed. The only nearby record of this species is a 2011 observation within the San Diego River, approximately 0.75 mile to the northwest.
Nuttall's scrub oak (<i>Quercus dumosa</i>)	CRPR 1B.1	Evergreen shrub. Blooms Feb-Apr. Sandy or clay loam soils associated with chaparral and coastal sage scrub. Elev 45-6,855ft.	No suitable chaparral occurs on site, and coastal sage scrub is highly disturbed. This is a conspicuous shrub and would have been detected if present.

STATUS CODES

Federal

- FE = Federal-listed endangered species
FT = Federal-listed threatened species

State

- SE = State-listed endangered species
ST = State-listed threatened species
SR = State-listed rare species

California Native Plant Society Rare Plant Ranking (CRPR)

- 1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
2B = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
3 = A review list for plants about which more information is needed. These species lack necessary data to assign them to another list or reject them.
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

- .2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
- .3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

Other

- MSCP = Final Multiple Species Conservation Program covered species
- NE = MSCP Narrow Endemic species

ATTACHMENT 6
Sensitive Wildlife Species Analyzed for Potential for Occurrence

Attachment 6. Sensitive Plant Species Analyzed for Potential for Occurrence

COMMON NAME	STATUS	HABITAT ASSOCIATION	POTENTIAL FOR OCCURRENCE
Amphibians			
western spadefoot (<i>Spea hammondi</i>)	SSC	Breeds in temporal pools and slow-moving sections of streams. Washes, river floodplains, alluvial fans, playas, alkali flats, temporary ponds, vernal pools, mixed woodlands, grasslands, coastal sage scrub, and chaparral.	Not expected to occur. No suitable temporary ponds or streams occur on site. The only nearby record of this species dates to 2003 and lacks specific location information, but likely was from the vicinity of the San Diego River (CDFW 2021).
Reptiles			
California glossy snake (<i>Arizona elegans occidentalis</i>)	CSC	Scrub and grassland habitats, often with loose or sandy soils.	Not expected to occur. Habitat on site is highly disturbed and lacks suitable loose sandy soils. The only nearby record of this species dates to 1937 (CDFW 2021)"
Coronado skink (<i>Plestiodon skiltonianus interparietalis</i>)	WL	Associated with mesic areas: grasslands, open woodlands and forest, broken chaparral, rocky habitats near streams.	Not expected to occur. Habitat on site is too disturbed and lacks suitable mesic areas to support this species. The nearest record of this species is a 1999 observation from a currently developed site on the lower slopes of Rattlesnake Mountain 0.8 mile to the east (CDFW 2021).
Birds			
Swainson's hawk (<i>Buteo swainsoni</i>)	ST MSCP (nesting colony)	Plains, range, open hills, sparse trees. Rare spring migrant. Local breeding population now extirpated.	Not expected to occur. Habitat on site is largely too disturbed to provide suitable habitat for this species. The only nearby record of this species dates to 1922 and lacks detailed location information (CDFW 2021).
yellow rail (<i>Coturnicops noveboracensis</i>)	SSC	Shallow marsh habitats dominated by sedges or low rushes. Occurs primarily in the Great Plains and the American southwest.	No suitable habitat occurs on site. The only known record of this species in the project vicinity is a from 1998 and likely represents an individual that flew off course during migration (CDFW 2021a).

least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE SE MSCP (nesting)	Willow-dominated successional woodland or scrub, Baccharis scrub, mixed oak/willow woodland, and elderberry scrub in riparian habitat. Nests and forages in vegetation along streams and rivers that measures approximately 3 to 6 feet in height and has a dense, stratified canopy.	Not expected to occur. No suitable riparian habitat occurs on site. All known records of this species in the vicinity of the project are located along the San Diego River a minimum of 0.64 miles to the north (CDFW 2021, County of San Diego 2021, USFWS 2021)
coastal California gnatcatcher (<i>Polioptila californica californica</i>)	FT SSC MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	Low potential to occur. The coastal sage scrub habitat on site is largely too disturbed to provide suitable habitat for this species. There are numerous records on the slopes adjacent to the Sky Ranch development, with the nearest occurring approximately 600 feet to the east, along the east side of SR 67 (CDFW 2021, County of San Diego 2021, USFWS 2021).
southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	WL MSCP	Coastal sage scrub, chaparral, grassland. Resident.	Low potential to occur. The coastal sage scrub on site is largely too disturbed to provide suitable habitat. There are several database records on Rattlesnake Mountain between approximately 2,000 and 3,500 feet to the east (CDFW 2021, County of San Diego 2021).
tricolored blackbird (<i>Agelaius tricolor</i>)	ST MSCP (nesting colony)	Freshwater marshes agricultural areas, lakeshores, parks. Localized resident. Breeding colonies well documented, inland San Diego County	Not expected to occur. No suitable marsh habitats occur on site. The only database records of this species within 2 miles are from along the San Diego River at least 0.7 mile to the northwest (CDFW 2021).
Mammals			
pallid bat (<i>Antrozous pallidus</i>)	SSC	Open scrub, grasslands, canyon shrub lands below 6,000 feet and coniferous forests above 6,000 feet. Roosts in rock crevices, caves, mines, tree hollows, and buildings. Occurs near water, colonial.	Not expected to occur. No suitable roosting habitat occurs on site. Foraging habitat is marginal. The only record of this species within 2 miles of the project area is from 1953 with uncertain location information (CDFW 2021).

pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	SSC	Colonial. Roosts primarily in rock crevices in cliffs and high rock outcrops, occasionally in buildings or caves. Forages over stock ponds and other water bodies in a variety of habitats, including desert scrub and pine-oak forests.	Not expected to occur. No suitable roosting habitat occurs on site and no bodies of water are present for foraging.
San Diego black-tailed jackrabbit (<i>Lepus californicus bennettii</i>)	SSC	Open areas of scrub, grasslands, agricultural fields.	Low potential to occur. Although Diegan coastal sage scrub is present, the project area is largely disturbed and provides only marginal quality habitat. The nearest record of this species is from the east side of Rattlesnake Mountain approximately 0.66 mile to the east.
southern mule deer (<i>Odocoileus hemionus</i>)	MSCP	Widespread throughout undeveloped portions of San Diego County.	Low potential. Although the project area is undeveloped, it is highly disturbed and located in a largely developed area. There are no records of this species within 2 miles of the project area.

STATUS CODES

Federal

FE = Federal-listed endangered species
 FT = Federal-listed threatened species

Other

MSCP = Final MSCP covered species

State

SE = State-listed endangered species
 ST = State-listed threatened species
 SSC = Species of special concern
 FP = Fully protected species
 WL = State-watch list species

ATTACHMENT 7
Summary of Preparer's Qualifications

Darin A. Busby, Principal Biologist

PROFESSIONAL SUMMARY

Mr. Busby has over 22 years of biological experience in the fields of wildlife research and education, and environmental consulting. His primary areas of expertise include conducting focused surveys and monitoring for a variety of state- and federally listed sensitive plant, invertebrate, amphibian, reptile, bird, and mammal species; evaluating impacts to sensitive biological resources; conducting both general and species-specific habitat assessments; designing, implementing, and managing field studies for general biological surveys and large-scale baseline ecological studies; performing wildlife movement studies; and conducting jurisdictional wetland delineations. In addition, Mr. Busby has experience preparing a variety of technical reports; managing project databases; and mapping with Global Positioning Systems.

Mr. Busby is knowledgeable of local, state, and federal regulatory requirements, including the City of San Diego Multiple Species Conservation Program and Multi-Habitat Planning Area, County of San Diego Multiple Species Conservation Program, North County Multiple Habitat Conservation Program and Subarea Plans, California Environmental Quality Act, California Endangered Species Act, National Environmental Policy Act, and the federal Endangered Species Act. He has worked on projects for a variety of clients, including government agencies, utility companies, military installations, and private landowners and developers, as well as local, state, and federal regulatory agencies.

PERMITS/CERTIFICATIONS/AUTHORIZATIONS

- USFWS Permit (#115373-3) – Approved to survey for and monitor nests of coastal California gnatcatcher, survey for Quino checkerspot butterfly, and survey for all California vernal pool branchiopods (fairy shrimp)
- USFWS Approval – Survey and monitor for desert tortoise, handle and monitor for arroyo toad
- CDFW Scientific Collecting Permit (#006243) – Approved to survey for insects, herpetofauna, birds, small mammals, and plants
- CDFW Memorandum of Understanding (#006243) – Approved to survey for California black rail
- BLM – Approved to survey for and handle flat-tailed horned lizard
- Willow Flycatcher Survey Training Workshop, Kern River Preserve, 2003
- Certification in Wetland Delineation Techniques, Management, and Advanced Hydric Soils.
- Federally, State, and Locally Certified Disadvantaged Business Enterprise (DBE)

EDUCATION

- B.S., Ecology & Evolution, University of California, Santa Barbara (1998)
- Wildlife Management Program, The School for Field Studies – Boston University, Kenya, East Africa (1997)

Brian Parker, Senior Biologist

PROFESSIONAL SUMMARY

Mr. Parker is a biological project manager with 18 years of experience conducting vegetation mapping, species surveys, habitat restoration, wetland delineations, and construction monitoring. He has successfully prepared numerous biological technical reports, resource management plans, habitat conservation plans, and restoration plans. He has performed focused surveys for western burrowing owl, coastal California gnatcatcher, least Bell's vireo, desert tortoise, flat-tailed horned lizard, arroyo toad, Quino checkerspot butterfly, Hermes copper butterfly, and small mammals. He also has formal field training in bat ecology, field capture, and acoustic monitoring.

PERMITS/CERTIFICATIONS/AUTHORIZATIONS

- USFWS Permit (#797665) – Approved to survey for California gnatcatcher and Quino checkerspot butterfly
- CDFW Scientific Collecting Permit for invertebrates, mammals, amphibians, and reptiles
- BLM – Approved to survey for and handle flat-tailed horned lizard
- OSHA 10-Hour Training Course in Construction Safety and Health
- County of San Diego Approved CEQA Consultants List for Biological Resources
- The Wildlife Society - Southern California Chapter, Treasurer and Professional Development Chair

EDUCATION

- M.B.A. Graduate School of Management, University of California, Davis
- M.A. Biology, University of California, Los Angeles
- B.S. Ecology, University of California, San Diego