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Biology Letter Report

Biological Resources, Project Impacts, and Mitigation: Avocado 5-lot Subdivision Tentative Subdivision Map No. 2022-0008 Project El Cajon, California

November 2023

Summary

The Avocado Tentative Subdivision Map No. 2022-0008 Project consists of a 5-lot Tentative Subdivision Map (TSM) allowing the construction of a residential development project with associated infrastructure. Approval and implementation of the project as proposed would result in the majority of the site being impacted by the proposed development. This includes grading, the construction of residential home sites, parking areas, fencing, drainage and water quality improvements, landscaping, fire clearing and related activities. The project site totals approximately 2.11 acres and consists of APN 493-391-13 and APN 493-441-35 under the same ownership. Habitats presently found onsite include Disturbed Diegan Coastal Sage Scrub, Disturbed Buckwheat Scrub, Ruderal Vegetation, and Disturbed/Developed Habitat. Impacts to Disturbed Diegan Coastal Sage Scrub and Disturbed Buckwheat Scrub must be mitigated for at ratios specified in this report, and it is recommended that this mitigation take place offsite in a City-approved location. In addition, an avian nesting survey and/or seasonal restrictions on site development are recommended to provide project consistency with the Migratory Bird Treaty Act and the California Fish and Game Code.

Introduction, Project Description, Location, and Setting

The Avocado Tentative Subdivision Map No. 2022-0008 Project (hereafter: TSM-2022-0008) proposes the subdivision of a vacant property in the City of El Cajon, California. Project approval would create five new residential parcels. The project site totals approximately 2.11 acres and includes APNs 493-391-13 and 493-441-35. Pads and related improvements along with a private road (Street "A") would be constructed with access onto Cajon View Drive to be improved to Avocado Avenue. New homes would eventually be built on each of the new pads.

The TSM-2022-0008 project site is situated along Avocado Avenue immediately north of Cajon View Drive in the southern part of the City (Figure 1). Avocado Avenue runs along the eastern boundary of the site. Residential areas are present in all directions surrounding the property and a new residential development project under construction is present to the west.

The City of El Cajon enrolled in the Natural Community Conservation Planning/Coastal Sage Scrub Program (NCCP/CSS) in June of 1993. This voluntary program obligated the City to follow certain habitat conservation planning guidelines directed towards the preservation of large-blocks of Coastal Sage Scrub vegetation and associated Special Status Species. The City further began to prepare a Subarea Plan under the guidelines of the Multiple Species Conservation Program, an offshoot of the NCCP/CSS Program. This Subarea Plan was never finished or certified, and the City currently relies on the Wildlife Agencies (California Department of Fish and Wildlife and U.S. Fish and Wildlife Service) for guidance with respect to impacts to native habitats and species. "Take" authorization for project impacts to sensitive habitats and listed species may need to be secured from the unincorporated County of San Diego through its I-122 Policy. Very little native vegetation remains in El Cajon, as the city is effectively built-out.

An incomplete biological study of the TSM-2022-0008 project site was initiated by Cadre Environmental in January of 2023. The Cadre document provided some background for this report, although a complete species inventory was assembled along with a complete, new baseline biology survey of entire project site. The purpose of the current survey has been to identify the site's flora and fauna (Table 2), correctly map the onsite habitat-types (Figures 3 and 4), identify potential project impacts (Table 1), and propose mitigation, if appropriate and required. Any useful data from the older study has been incorporated into this report.

Habitats/Vegetation Communities

The TSM-2022-0008 project site supports areas of open to dense native scrub, weedy and forb-dominated ruderal vegetation, and developed/disturbance-responsive habitat. In 2006, the site was completely cleared of vegetation (Figure 2), presumably in preparation for agriculture. However, planting was abandoned, and the vegetation regrew albeit in a patchy manner. Currently, the onsite habitats (Figures 3 and 4) include the following:

Disturbed Diegan Coastal Sage Scrub – 0.42 acre

Disturbed Diegan Coastal Sage Scrub (DCSS) vegetation is found on the northern portion of the property on a mostly northwest-facing slope. The dominant indicators of this vegetation-type include Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and California Sagebrush (*Artemisia californica*) along with occasional other scrub species including Redberry *(Rhamnus crocea)* and White Sage *(Salvia apiana)*. This area represents the least disturbed portion of the property although there are ample signs of encampments and associated debris in places. The DCSS vegetation onsite is considered to be of low to moderate biological resource value based on patch size, isolation, and disturbances.

Disturbed Buckwheat Scrub – 1.02 acre

A patch of vegetation that best qualifies as Disturbed Buckwheat Scrub (DBS) occurs in a band through the property center. Indicators include a very heavy infusion of non-native weeds, mostly Shortpod Mustard *(Hirschfeldia incana),* along with occasional specimens of Flat-top Buckwheat and Laurel Sumac shrubs. This area also supports clear evidence of foot traffic and abandoned encampments. The vegetation appears to be successional and transitional between more heavily disturbed areas to the southeast and higher value areas to the northwest. The DBS vegetation onsite is of low to moderate biological resource value.

Ruderal Vegetation– 0.53 acres

The southern end of the property supports habitat that is best classified as Ruderal Vegetation (RV). This vegetation is found on dry areas that were originally sparsely vegetated, cleared continuously in the past, influenced by a very heavy infusion of non-native weeds, and impacted by other edge effect elements, including dumping, foot traffic, and encampments. Indicators of the habitat include thick stands of mowed and un-mowed Shortpod Mustard and widely spaced native Laurel Sumac shrubs and a diversity of other weedy forbs and occasional Eurasian grasses. The RV on this site is of low biological resource value.

Disturbed/Developed Habitat – 0.14 acre

Disturbed/Developed Habitat (DDH) is found on the southern portion of the site and on adjoining offsite areas. These areas support low weeds and bare dirt along the shoulder of Avocado Avenue and the paved footprint of Cajon View Drive. A second, adjoining area that qualifies as DDH is found adjacent to the neighboring property to the west, directly adjacent to the property line. This area appears to be being maintained as bare by the adjacent property owner, presumably to reduce fire hazards. The DDH onsite is of low biological resource value.

Flora and Fauna

Fifty-seven species of vascular plants and twenty species of animals were detected during the field surveys of the property. These are listed in Table 1. This list represents a characteristic flora and fauna associated with this part of the City of El Cajon. Most of the species detected are common to this area, although one is considered a special status, or "sensitive" species.

Special Status Species

One sensitive plant species was detected during the recent site surveys. This is San Diego County Viguiera, a distinctive, yellow-flowering shrub with small, triangular, sandpapery leaves:

San Diego County Viguiera (*Bahiopsis laciniata)*

Listing: CRPR List 4.2

County status: San Diego County Sensitive Plant List, Group D (PDS, 2011)

Federal/State status: none

Distribution: This distinctive species occurs from about Mission Valley in central San Diego County south to adjacent areas in northern Baja California along the coast and in foothill areas. Reported localities in Saan Diego County include Mission Valley, La Mesa, El Cajon, Portrero, Dehesa, Otay, and Tecate. Many populations are threatened by development, although it remains common where it occurs. Also found in Orange County and elsewhere where it has been introduced by horticulture and hydroseeding.

Habitat: Occurs in coastal sage scrub, maritime scrub, and xeric chaparral, occasionally as a co-dominant.

Status on Site: Three or four individual San Diego County Viguiera shrubs were detected onsite during the survey.

No sensitive animal species were detected during the survey. Various wide-ranging or cryptic species might be anticipated to occur onsite, including soaring raptors and native bats. Also anticipated would be various sensitive native reptiles which were not detectable at the time of the field survey, However, no critical populations or highly sensitive species would be anticipated, given the small size and disturbed nature of much of the property. The edge effects from surrounding development would limit the viability of any onsite populations of sensitive species.

Sensitive plant and animal species known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 3.

Jurisdictional Wetlands and Waterways

The TSM-2022-0008 project site supports no jurisdictional Wetlands or Waterways. The property shows no signs of significant drainage or runoff other than sheet flow down the slopes and limited rill erosion in some areas.

Other Unique Features/Resources/Biological Concerns

Because of the TSM-2022-0008 property's location (generally surrounded by development), small size, and mostly disturbed nature, it lacks unique features or resources that would enhance its biological significance. For to these reasons, wildlife corridors or linkages are not present onsite and there is little potential for large mammals to use the property, other than urban-tolerant species (skunks, opossums, coyotes, etc). The open, undeveloped areas of the site support limited raptor foraging habitat. Several sensitive raptor species are known from the vicinity (Table 3), and some of these could forage onsite on occasion. However, the site lacks any significant areas of potential raptor nesting habitat.

Significance of Project Impacts and Proposed Mitigation

The TSM-2022-0008 project is subject to review under the California Environmental Quality Act (CEQA) and the City's NCCP/CSS guidelines. This means that the City requires that project-related impacts to native habitats and species be "less than significant", as defined by CEQA, and consistent with the requirements of the NCCP/CSS guidelines. This requires the adoption of specific mitigation measures intended to reduce "significant" impacts to a level that is "less than significant". Project-related impacts, as we have identified them, are presented in Table 1. The impact assessment and mitigation recommendations found in this report are based on the most current field work and CEQA standards.

Direct and Indirect Impacts

Approval and the subsequent implementation of TSM-2022-0008 could result in the following direct and indirect impacts as defined by CEQA. Although not all of the vegetation on this site will be directly removed by grading, indirect impacts resulting from edge effects, fire clearing, etc. are anticipated to result in 100 percent of the site being impacted, directly or indirectly, as follows:

1. A loss of up to 0.42 acres of DCSS as a result of grading and clearing for fire protection. Impacts to DCSS are considered **significant** and require mitigation.

2. A loss of up to 1.02 acres of DBS as a result of site grading. Impacts to DBS are considered **significant** and require mitigation.

3. A loss of up to 0.53 acres of RV as a result of site grading. Impacts to RV are considered **less than significant** and do not require mitigation.

4. A loss of up to 0.14 acre of DDH as a result of site grading. Impacts to DDH are considered **less than significant** and do not require mitigation.

5. Potential displacement impacts to nesting raptors or migratory songbirds are considered **significant**. The federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code (CFGC) protect the nests of essentially all native birds. Avian nesting in some of the nearby trees or larger shrubs on or adjacent to the site is possible as is ground nesting by certain species. Any disturbance, either direct or indirect, that would cause abandonment of active nests containing eggs or young would be a violation of the MBTA and/or the CFGC, and thus inconsistent with the requirements of CEQA.

Cumulative Impacts

Section 15064 of the State CEQA Guidelines governs the determination of significant environmental impacts caused by a project. The evaluation of a project's cumulative impacts is discussed in Section 15064(h) of the CEQA Guidelines. Cumulative impacts must be discussed when project impacts, although individually limited, are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource (CEQA Guidelines §15064(h)(1)).

A lead agency may determine in an initial study that "a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable" (CEQA Guidelines §15064(h)(2)). The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (CEQA Guidelines §15064 (h)(4)).

The following statements are addressed in order to assess potential cumulatively considerable impacts associated with the TSM-2022-0008 Project:

1. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species?*

Response: The TSM-2022-0008 Project could impact up to 0.42 acre of DCSS and 1.02 acres of DBS. Although regulated and considered sensitive, these habitat-types remain relatively well-distributed in San Diego County. Furthermore, the habitats present on the TSM-2022-0008 project site are disturbed and isolated in nature. Therefore, this project's relatively minor impacts to DCSS and DBS (from a regional perspective) are not considered "cumulatively considerable" when viewed in the context of the substantial acreages of these habitat-types persisting in San Diego County. Furthermore, all impacts to these habitat-types will be fully mitigated for, reducing them to below a level of significance.

San Diego County Viguiera was the only sensitive species observed on the project site. San Diego County Viguiera is relatively well distributed in San Diego County, and only a handful of specimens appear to occur on the subject project site. Therefore, the minor impacts to this species associated with the TSM-2022-0008 project are not cumulatively considerable. Furthermore, impacts to this species will be fully mitigated for via the adoption of "habitat-based" mitigation, as promoted by the NCCP, theoretically reducing them to a level below significance. A number of additional sensitive species are known to occur in the general vicinity of this property and some of these could utilize the site, such as various species of rare bats, various species of raptors, uncommon reptiles, etc. However, it is unlikely that any locally or regionally-significant populations of special status species would be found onsite. In any case, all potential cumulative project impacts to sensitive species will be mitigated to a level that is below significance through the preservation of equivalent or better-quality habitat presumably supporting the same special status species that could occur onsite.

2. *Does the project have impacts that are individually limited, but cumulatively considerable?*

Response: Because all project impacts will be mitigated to a level that is below significance, the TSM-2022-0008 project will not have cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resources.

Proposed Mitigation

In order to reduce project impacts (see Table 1) to "less than significant", the following mitigation measures are recommended:

1. Impacts to CSS generally require mitigation at a ratio between 1:1 and 3:1, based primarily on the quality of the vegetation/habitat. That is, for every acre-unit of CSS being impacted, between one and three acre-units of equal or higher value CSS (or other higher-value habitat) must be conserved. This can take place either onsite or offsite in an approved location. The subject project will impact slightly less than one-half acre (0.42 acre) of DCSS. Based on the quality of the DCSS and patch size of the

vegetation, it is recommended that a 2:1 mitigation ratio be applied. Therefore, at least 0.84 acre of CSS mitigation should apply. Furthermore, "take" authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 0.84 acre of CSS or higher-value Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

2. Impacts to DBS are generally evaluated as being equivalent to impacts to CSS. That is, they require a similar mitigation approach. The subject project will impact approximately 1.02 acre of DBS. Due to the very heavily disturbed nature of the DBS on the subject site, it is recommended that the impacts to this habitat be mitigated at a 1:1 ratio. In other words, for every acre-unit of DBS impacted, one acre-unit of equal or higher value scrub habitat (or other higher-value habitat) must be conserved. Therefore, at least 1.02 acre of DBS mitigation should apply. Furthermore, "take" authorization to permit this impact may need to be secured from the unincorporated County of San Diego through its I-122 Policy. It is recommended that this mitigation be provided offsite via the purchase of 1.02 DBS (or CSS or higher-value) Conservation Credits from an approved Conservation Bank to the satisfaction of the City of El Cajon and the Wildlife Agencies.

3. Impacts to RV and DDH do not require mitigation. Impacts to these habitat-types are less than significant.

4. Site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird or raptor nesting location (including ground-nesting location) should not take place during the spring/summer songbird breeding season, defined as from 1 January (for nesting raptors) to 31 August of each year. This is required in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prevents the "take" of eggs, nests, feathers, or other parts of most native bird species, and the Endangered Species Act. Limiting development activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 500 feet of the proposed activity will be required. The results of the survey will be provided in a report to the City's Planning Division for concurrence with the conclusions and recommendations.

No other biological mitigation associated with the TSM-2022-0008 project is recommended at this time.

Table 1. Impact/Mitigation Analysis

Vegetation	Project Habitat Acreage	Project Impact Acreage[1]	Mitigation Ratio	Mitigation Requirement[2]
DCSS	0.42 ac	0.42 ac	2:1	0.84 ac
DBS	1.02 ac	1.02 ac	1:1	1.02 ac
RV	0.53 ac	0.53 ac	n/a	none
DDH	0.14 ac	0.14 ac	n/a	none
Total	**2.11ac**	**2.11 ac**	**---**	**1.86 ac**

[1] *Assumes full site development with fire clearing, etc,*
[2] *Assumes offsite mitigation in a City and Agency-approved location*

Preparers and Persons/Organizations Contacted

Preparers:

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Attachments

Figure 1. Regional Location on USGS Quadrangle Map
Figure 2. 2006 Aerial Photo showing Clearing
Figure 3. Current Aerial Photo
Figure 4. Biological Resources on Recent Aerial Photo
Figure 5. Biological Resources on Tentative Subdivision Exhibit

Table 1. Impacts and Mitigation
Table 2. Flora and Fauna Detected
Table 3. Sensitive Species Known from the Vicinity

Attachment A. Site Photographs

Figure 1. Regional Location – TSM-2022-0008 Property
Portion of U.S.G.S. "El Cajon, California" 7.5' Quadrangle Map

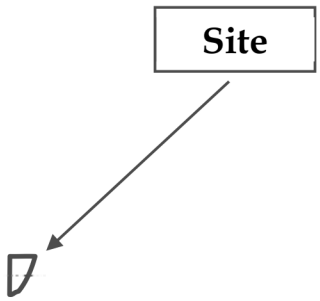

Figure 2. Aerial Photo showing Complete Clearing in 2006 – TSM-2022-0008

Figure 3. Recent Aerial Photo– TSM-2022-0008

Figure 4. Biological Resources on Recent Aerial Photo – TSM-2022-0008

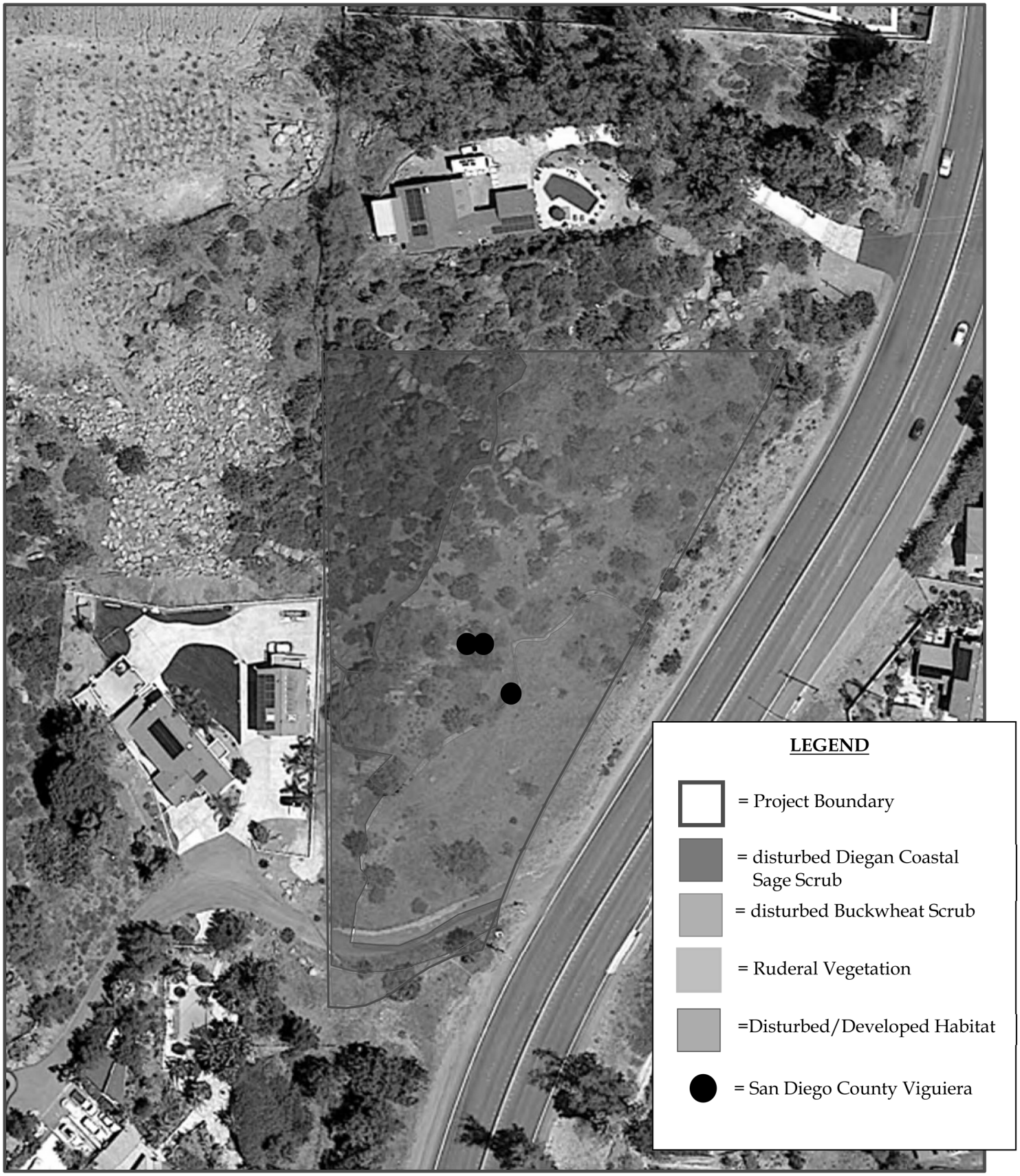

Figure 5. Biological Resources on Tentative Subdivision Exhibit – TSM-2022-0008

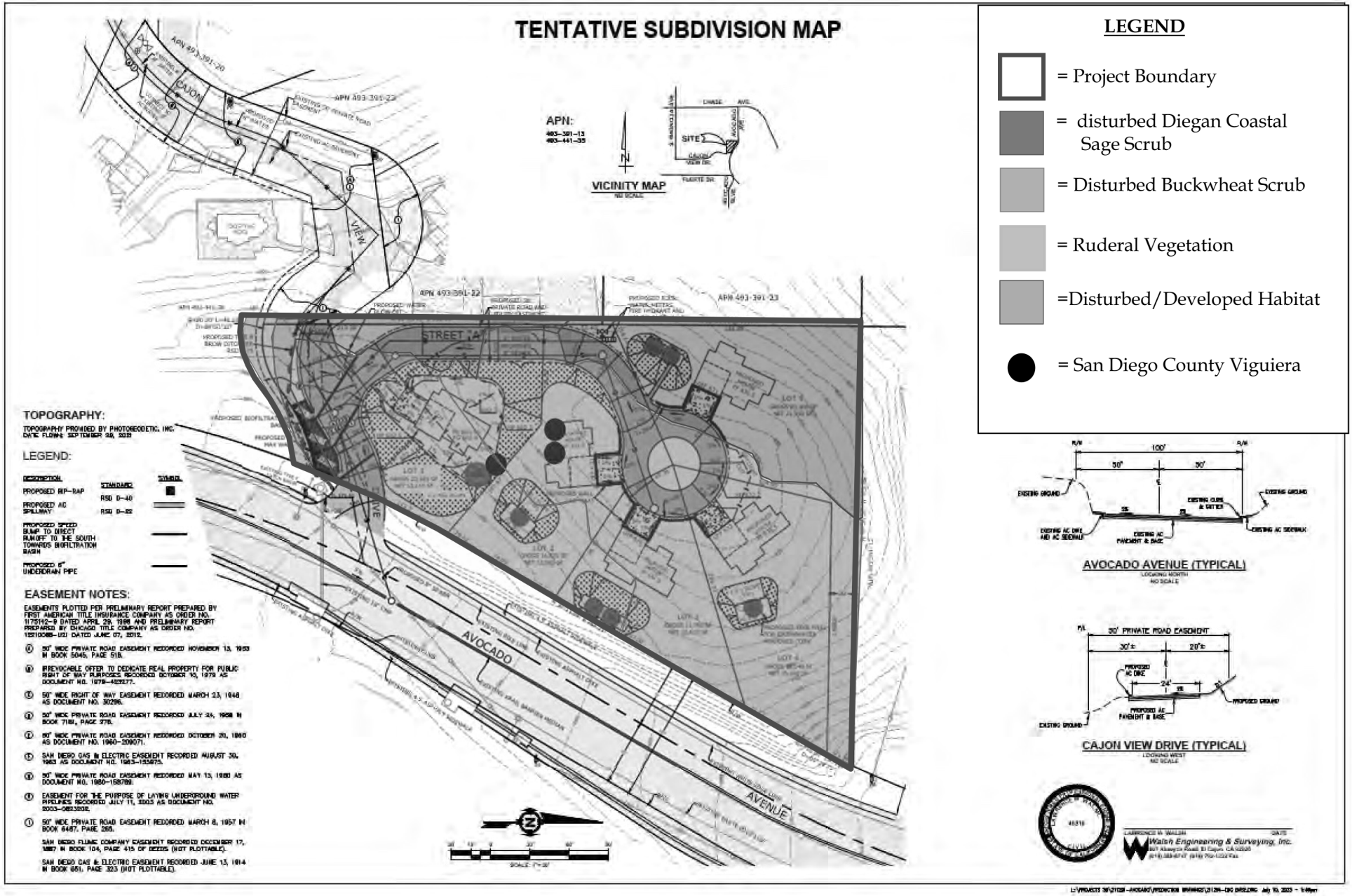

Table 2. Flora and Fauna Detected – the TSM-2022-0008 Property

Scientific Name	Common Name
Plants	
Acmispon glaber	Deerweed
Acourtia microcephala	Sacapellote
Ailanthus altissima *	Tree-Of-Heaven
Amaranthus albus	Prostrate Pigweed
Artemisia californica	California Sagebrush
Avena fatua *	Wild Oat
Baccharis pilularis	Coyote Bush
Baccharis sarothroides	Desert Broom
Bahiopsis laciniata	**San Diego County Viguiera**
Brassica nigra *	Black Mustard
Bromus diandrus *	Ripgut Brome
Bromus rubens *	Red Brome
Carduus pycnocephalus *	Italian Thistle
Cenchrus setaceus *	Fountain Grass
Clematis pauciflora	Southern California Clematis
Cuscuta subinclusa	Canyon Dodder
Dittrichia graveolens *	Stinkwort
Dudleya pulverulenta	Chalk Dudleya
Epilobium sp.	Willowherb
Erigeron bonariensis *	Flax-Leaved Horseweed
Erigeron canadensis *	Horseweed
Eriogonum fasciculatum	Flat-top Buckwheat
Erodium brachycarpum *	Hairy-Pitted Stork's-Bill
Erodium cicutarium *	Red-Stem Stork's-Bill
Erodium sp. *	Stork's-Bills
Eucalyptus sideroxylon *	Red Ironbark
Eulobus californicus	California Primrose
Euphorbia maculate *	Spotted Spurge
Funastrum heterophyllum	Hartweg's Climbing Milkweed
Heterotheca grandiflora	Telegraphweed
Hirschfeldia incana *	Shortpod Mustard
Lactuca serriola *	Wild Lettuce
Malosma laurina	Laurel Sumac
Marah macrocarpa	Chilicothe
Marrubium vulgare *	White Horehound
Nicotiana glauca *	Tree Tobacco
Opuntia ficus-indica *	Indian Fig Opuntia
Opuntia oricola	Chaparral Pricklypear
Pentagramma sp.	Pentagramma Fern
Phacelia cicutaria hispida	Caterpillar Phacelia
Phacelia ramosissima	Branching Phacelia
Physalis crassifolia	Thickleaf Groundcherry
Pseudognaphalium biolettii	Two-Color Rabbit Tobacco
Pseudognaphalium californicum	California Cudweed
Quercus agrifolia agrifolia	California Live Oak
Raphanus sativus *	Wild Radish
Rhamnus crocea	Redberry Buckthorn
Sairocarpus sp.	Snapdragon
Salsola sp. *	Russian Thistles
Sambucus cerulea	Blue Elder
Scrophularia californica	California Beeplant
Sisymbrium altissimum *	Tall Tumblemustard

Table 2. Flora and Fauna Detected – the TSM-2022-0008 Property

Scientific Name	Common Name
Plants (cont)	
Solanum nigrum	Black Nightshade Complex
Sonchus asper *	Prickly Sowthistle
Stephanomeria diegensis	San Diego Wirelettuce
Urtica urens *	Dwarf Nettle
Yucca schidigera	Mojave Yucca
Mammals	
Canis latrans	Coyote
Sylvilagus audubonii	Desert Cottontail Rabbit
Thomomys bottae	Valley Pocket Gopher
Birds	
Archilochus anna	Anna's Hummingbird
Buteo jamaicensis	Red-tailed Hawk
Carpodacus mexicanus	Housefinch
Columba livia *	Rock Dove
Corvus brachyrhynchos	Common Crow
Dendroica coronata	Audubon's Warbler
Mimus polyglottos	Mockingbird
Pipilo crissalis	California Towhee
Psaltriparus minimus	Bushtit
Sayornis nigricans	Black Phoebe
Sayornis saya	Say's Phoebe
Selasporus sasin	Allen’s Hummingbird
Spinus psaltria	Lesser Goldfinch
Sturnus vulgaris *	Starling
Zenaida macroura	Mourning Dove
Zonotrichia leucophrys	White-crowned Sparrow
Reptiles	
Sceloporus occidentalis longipes	Great Basin Fence Lizard

Total - 57 plants and 20 animals

* - non-native taxon **bold** - sensitive taxon

Table 3. Sensitive Species Known from the Vicinity – TSM-2022-0008 Property Project

Scientific Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	State Rare	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	**Probability of Occurrence**
Artemisia palmeri	San Diego Sagewort					X	X	X	X	X	X	X	X							X			**L**
Bahiopsis laciniata	San Diego County Viguiera					X	X				X												**O**
Caulanthus stenocarpus	Slender Pod Jewelflower				X	X	X		X	X	X	X	X										**L**
Centromadia parryi australis	Southern Tarplant							X															**L**
Eryngium aristulatum parishii	San Diego Button Celery	X		X		X		X	X												X		**L**
Githopsis diffusa filicaulis	Mission Canyon Bluecup							X							X								**L**
Holocarpha virgata elongata	Graceful Tarplant					X		X									X				X		**L**
Hordeum intercedens	Vernal Barley							X											X				**L**
Juncus acutus leopoldii	Southwestern Spiny Rush							X															**L**
Muilla clevelandii	San Diego Goldenstar								X	X													**M**
Ophioglossum californicum	California Adder's Tongue Fern							X								X							**L**
Pentachaeta aurea	Golden-rayed Pentachaeta					X	X	X			X					X	X						**M**
Quercus engelmannii	Engelmann Oak					X		X							X			X					**L**
Accipiter striatus	Sharp-shinned Hawk						X	X		X										X			**L**
Ammodramus savannarum	Grasshopper Sparrow								X														**L**
Anniella pulchra pulchra	Silvery Legless Lizard					X		X															**M**
Ardea herodias	Great Blue Heron							X	X													X	**L**
Athene cunicularia hypugea	Burrowing Owl								X														**L**
Branchinecta sandiegoensis	San Diego Fairy Shrimp	X						X												X			**L**
Branta canadensis	Canada Goose (winter)								X			X	X	X			X			X		X	**M**
Buteo lineatus	Red-shouldered Hawk					X	X	X			X					X			X				**M**
Buteo regalis	Ferruginous Hawk (winter)						X		X	X					X								**L**
Chaetodipus fallax fallax	NW San Diego Pocket Mouse					X	X	X	X	X	X	X	X							X			**L**
Circus cyaneus hudsonius	Northern Harrier					X	X		X	X	X	X	X										**M**
Clemmys marmorata pallida	Southwestern Pond Turtle							X														X	**L**
Danaus plexippus	Monarch Butterfly					X		X	X												X		**M**
Dendroica petechia brewsteri	Yellow Warbler							X							X								**L**
Dipodomys stephensi	Stephen's Kangaroo Rat	X				X		X									X				X		**L**
Elanus caeruleus	Black-Shouldered Kite							X											X				**M**
Empidonax trailii extimus	Southwestern Willow Flycatcher	X						X															**L**
Eremophila alpestris actis	Horned Lark								X	X													**M**
Euderma maculatum	Spotted Bat							X								X							**M**
Euphydryas editha quino	Quino Checkerspot Butterfly	X				X	X	X			X					X	X						**L**
Euphys vestris harbisoni	Dun Skipper					X		X							X			X					**L**

Table 3. Sensitive Species Known from the Vicinity – TSM-2022-0008 Property Project

Scientific Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	State Rare	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	**Probability of Occurrence**
Falco mexicanus	Prairie Falcon							X								X	X						**L**
Ictera virens	Yellow-breasted Chat								X														**L**
Lanius ludovicianus	Loggerhead Shrike					X		X	X	X						X	X						**M**
Larus californicus	California Gull (non-breeding)							X							X			X		X	X	X	**L**
Lasiurus blossevillii	Western Red Bat								X	X		X	X							X			**M**
Macrotus californicus	California Leaf-nosed Bat					X	X		X							X	X						**M**
Polioptila californica californica	California Gnatcatcher		X			X																	**M**
Rana aurora draytoni	California Red -legged Frog		X						X						X					X		X	**L**
Sialia mexicana	Western Bluebird								X	X		X											**M**
Thamnophis hammondii	Two Stripe Garter Snake								X						X								**L**
Thamnophis sirtalis novum	South Coast Garter Snake								X						X								**L**
Tyto alba	Common Barn-owl								X	X													**L**
Vireo bellii pusillus	Least Bell's Vireo	X		X					X														**L**

Probability of Occurrence Codes with Rational for Ranking:

L – Low Probability; rare species in area, and no significant habitat (animals), *or* distinctive perennial that would not have been missed if present onsite (perennial plants), *or* soil types, hydrology, etc. not appropriate (ephemeral plants).
M – Moderate Probability; could be expected to occur onsite on at least an occasional basis, based on habitat quality (animals), *or* could occur onsite, but very rare, and/or poorly known (plants)
H – High Probability; certain to occur onsite on a regular basis (animals), but cryptic, *or* ephemeral species known from the immediate vicinity, but seasonal in occurrence (plants)
O – Observed; see text for detailed discussion.

Attachment A

Site Photographs

Photo 1. View of the DCSS habitat on the TSM-2022-0008 property near the northern property edge looking northwest.

Photo 2. View facing northeast from the western edge of the property providing an overview of the RV habitat.

Photo 3. View facing west from the southeast corner of the property showing site access from Cajon View Drive.

Photo 4. View facing east from the northern portion of the property providing an overview of the DBS habitat onsite.