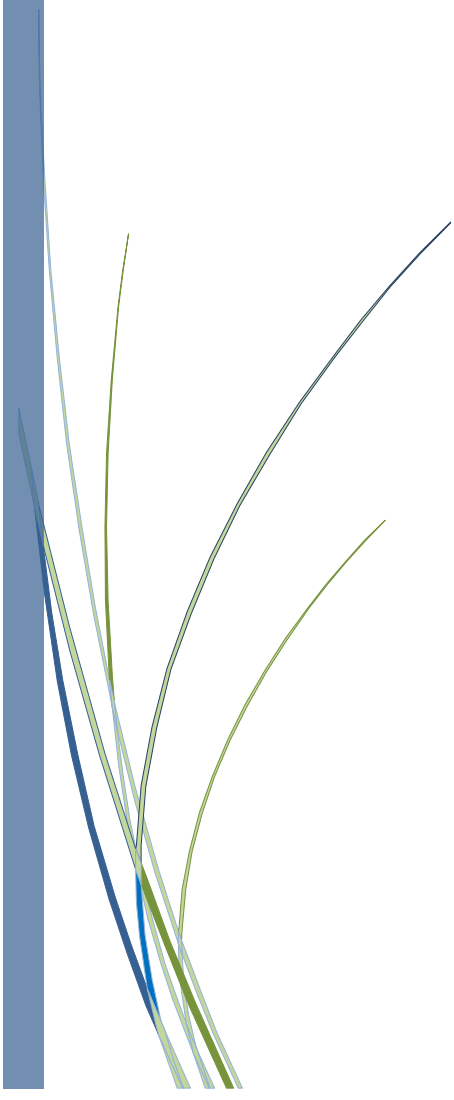
March 2023

City of San Diego Romero Subdivision APN: 352-300-11 San Diego, California

Biological Resources Report



Prepared for:

Manchester Financial Group
2550 Fifth Avenue, 9th Floor
San Diego, California 92103

Prepared by:

Leopold Biological Services
11160 Portobelo Drive
San Diego, California 92124

Romero Subdivision

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1.0 EXECUTIVE SUMMARY

The purpose of this biological resources study is to document the existing biological conditions for the proposed Romero Subdivision project APN: 356-300-11 (herein referred to as Romero Subdivision or project); identify potential impacts to biological resources that could result from implementation of the project, and recommend measures to avoid, minimize, and mitigate significant impacts consistent with the California Environmental Quality Act (CEQA) and applicable federal, state and local rules and regulations.

Romero Subdivision is located at 6850 Country Club Drive, La Jolla, California 92037, at the south terminus of Romero Drive. The proposed project is located at APN: 352-300-11, southwest of Romero Drive in the La Jolla Community Plan Area. Environmentally Sensitive Lands (ESL) surrounds the 4.20-acres developed parcel. The isolated ESL is bound by residential development and consists primarily of southern maritime chaparral.

The proposed project will subdivide the 4.20-acres developed parcel into 6-parcels: 5-developed and one driveway parcel. Plans to construct 5 new single-family residences is in process. The project scope includes: new driveways to each residence, new biofiltration basins for each residence, landscaping and new swimming pools for each residence, and a new 6-foot concrete masonry unit (CMU) fence in the east portion of Lot 1.

The proposed project has been designed to minimize all permanent impacts to the maximum extent practicable. The least environmentally impactive locations have been selected for development based on the location of sensitive biological resources, defensible space and access considerations. No water will be discharged directly into the ESL. Design features to mitigate potential impacts from increased impervious surfaces includes: retaining walls and an independent conveyance system for each residence. The conveyance system will convey runoff into individual subgrade conveyance systems into each biofiltration basin, then will release runoff to the existing rip-rap energy dissipater located at the north parcel boundary.

Romero Subdivision is within the City's Multiple Species Conservation Program (MSCP) and the coastal overlay zone, and entirely outside of the Multi-Habitat Planning Area (MHPA).

No critical habitat occurs within the Biological Survey Area (BSA). The closest critical habitat is approximately 3.87-miles northeast, adjacent to MCAS Miramar. Consequently, implementation of the proposed project will not result in impacts to critical habitat.

A jurisdictional ephemeral drainage is present approximately 50 feet east of the driveway, draining southwest to a storm drain inlet at the south ESL boundary. The Corps determined the ephemeral drainage is non-wetland Waters of The US (WoUS) based on the lack of hydrophytic vegetation and hydric soils. The ephemeral drainage does not meet the City's definition of City-jurisdictional "wetlands" as defined in the City's ESL Regulations and Biological Guidelines. Although there is disturbed wetland within the parcel boundaries, the disturbed wetland is a storm water conveyance system, a man-made biofiltration basin. In c. May 2018, the parcel was completely developed with lush turf, cart paths, access gates, French drains and a private driveway. The storm water conveyance system was installed to drain the developed land. Therefore, no impacts to jurisdictional wetlands will occur due to project implementation.

The parcel is developed land, void of sensitive vegetation communities. The parcel is landscaped with well-maintained turf, cart paths, and a man-made biofiltration basin constructed c. May 2018.

Thus, no impacts to sensitive vegetation communities will occur due to project implementation.

Although steep hillsides occur in the adjacent BSA, east and north of the driveway, no steep hillsides or slopes occur within the parcel boundaries. The parcel is not part of a steep hillside system. Therefore, no impacts to steep hillsides or slopes will occur due to project implementation.

Five sensitive flora species, Nuttall's scrub oak (CRPR 1B.1), Torrey pine (CRPR 1B.2), coast barrel cactus (CRPR 2B.1), wart-stemmed ceanothus (CRPR 2B.2), and coast desert-thorn (CRPR 4.2), were located and mapped within the BSA during the reconnaissance-level survey in the adjacent ESL. Three additional sensitive plant species occur in the ESL, outside the mapped BSA, decumbent goldenbush (CRPR 1B.2), western dichondra (CRPR 4.2), and ashy spike-moss (CRPR 4.1). Although sensitive flora species occur adjacent to the parcel, the parcel is developed land, void of sensitive flora species. Consequently, no direct impacts to sensitive flora species will occur due to project implementation.

Five sensitive wildlife species were observed in the BSA during the survey: Belding's orange-throated whiptail, San Diego desert woodrat (midden), Cooper's hawk, California gnatcatcher, and western bluebird. Although sensitive wildlife species were observed in the BSA, no suitable habitat occurs within the parcel boundaries. The parcel is developed land, primarily turf and cart paths. Therefore, no direct impacts to sensitive wildlife species will occur due to project implementation.

Suitable Cooper's hawk nesting sites lie adjacent to the development area, on the parcel to the west and north. Noise from construction activities have the potential to disrupt nesting activities, resulting in indirect impacts to Cooper's hawk during the breeding season (February 1 through September 15). Therefore, mitigation measures are provided in Section 8.0 Mitigation and Monitoring Requirements.

The parcel is developed land, void of naturally occurring vegetation communities. The parcel is primarily landscaped with well-maintained turf, cart paths, and a man-made biofiltration basin constructed c. May 2018. Although natural lands consisting primarily of southern maritime chaparral exists within the adjacent ESL, the ESL is isolated, surrounded by dense residential development. The closest wildlife corridor is Rose Canyon Open Space, approximately 1.43-miles east of the BSA. Consequently, use by terrestrial animals with a north-south or east-west home-range movement will be unlikely.

A brush management plan will be implemented pursuant to San Diego Municipal Code Section 142.0412. The proposed project is entirely developed lands and disturbed wetlands, a man-made biofiltration basin designed to drain developed land. However, the proposed project borders ESL which contains highly flammable, rare vegetation communities. Considering the parcel's size, configuration and constraints, it is infeasible to maintain the required 35-foot Brush Management Zone-1 (BMZ-1) in Lot 1 east section. BMZ-1 will be reduced from 35-feet to 20-feet in Lot 1 east section. The brush management plan will be modified to include design features to compensate for the reduction of BMZ-1. Design features include: install of a 6-foot CMU fence, one-hour fire rating for exterior walls, one-hour minimum fire rating Class-B roof, Type IV heavy timber for exposed exterior walls, permeable, non-combustible exterior walking surface, etc. Design features are coordinated and approved by the Fire Chief.

In addition, Lot 1 single-family residence will be located as far west as feasible to accommodate for the reduction of BMZ-1. A Final Brush Management Plan is provided with the site plans.

2.0 INTRODUCTION

2.1 Purpose of Study

This report presents the result of a biological survey and analysis for Romero Subdivision. The purpose of this biological resources study is to document the existing biological conditions within the BSA; identify potential impacts to biological resources that could result from implementation of the project, and recommend measures to avoid, minimize, and mitigate impacts consistent with CEQA and applicable federal, state and local rules and regulations.

2.2 Project Location

Romero Subdivision project is located at 6850 Country Club Drive, La Jolla, California 92037, at the south terminus of Romero Drive. The proposed project is located at APN: 352-300-11, southwest of Romero Drive in the La Jolla Community Plan Area (Figure 1). ESL surrounds the 4.20-acres parcel. The isolated ESL is bound by residential development and consists primarily of southern maritime chaparral.

Romero Subdivision is developed land within the City's MSCP and the coastal overlay zone, and entirely outside of the MHPA (City of San Diego 2022).

2.3 Project Description

The proposed project will subdivide the 4.20-acres developed parcel into 6-parcels: 5-developed and one driveway parcel. Plans to construct 5 new single-family residences is in process. The project scope includes:

- New driveways to each residence
- New biofiltration basins for each residence
- Landscaping and new swimming pools for each residence
- New 6-foot CMU fence in the east portion of Lot 1

The proposed project has been designed to minimize all permanent impacts to the maximum extent practicable. The least environmentally impactive locations have been selected for development based on the location of sensitive biological resources, defensible space and access considerations.

No water will be discharged directly into the ESL. Design features to mitigate potential impacts from an increased impervious surface area includes:

- Retaining walls installed
- Convey runoff from an increase impervious surface area into individual subgrade conveyance systems to each biofiltration basin, then released runoff to the existing rip-rap energy dissipater, located at the north parcel boundary

Figure 1 –Project Vicinity

3.0 METHODOLOGY

Literature and data pertaining to the BSA were reviewed prior to the on-site biological resource assessment. Literature, maps, databases, agency web sites, and aerial imagery were obtained from public domain sources. Review included examination of the following: historical U.S. Geological Survey (USGS) La Jolla quadrangle topographic maps (USGS 1996) and aerial imagery (Google Earth 2022), Draft VPHCP Interactive Map (City of San Diego 2022), California Natural Diversity Database State and Federally Listed Endangered, Threatened, and Rare Plants of California (CNDDB 2022), California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (CNPS 2022), Information Planning and Conservation (IPaC) (USFWS 2022), San Diego County Plant Atlas (SDNHM 2022), USDA Web Soil Survey (USDA 2022), National Wetlands Inventory (USFWS 2022), Critical Habitat for Threatened & Endangered Species (USFWS 2022), California Department of Fish and Wildlife (CDFW) BIOS Viewer for Multiple Species Conservation Program Cores and Linkages (CDFW 2022), the City of San Diego Land Development Code, Biology Guidelines (City of San Diego 2012) and the Biotechnical Report for the Copley Press The Reserve Project (Dudek 2015).

On November 30, 2022, Leopold's Senior Biologist conducted a reconnaissance-level survey within the BSA. Schedule of surveys are provided in Table 1.

Table 1
Schedule of Surveys

Date	Hour	Personnel	Focus	Conditions
Nov 30, 2022	0930-1200	Christine Harvey	Habitat assessment, plant and animal inventory, vegetation mapping	Cloud cover fog, wind 2-3 mph, 55-56 ^{O}F

During the reconnaissance-level survey, the Senior Biologist used topographic and aerial maps to help direct in survey efforts. Sensitive species, vegetation communities and physical features were identified and recorded. In addition, the Senior Biologist used a Global Positioning System (GPS) unit and other GIS and survey-related techniques, hardware and software to collect locational data to record relevant attributes of features or species encountered. Digital color photographs were taken during the field survey to record site conditions and the biological resources present. Survey site photographs are provided in Appendix F.

Existing vegetation types were classified according to the Holland (1986) code classification system as modified by Oberbauer (2008) and were mapped in accordance with the City's current biological resource mapping requirements (City 2012). Plant identifications were either resolved in the field or later determined through verification of voucher specimens (Baldwin 2012). In addition, directed searches for the queried list of sensitive species with a potential to occur on-site were conducted within the BSA, and any other potential occurrences were assessed in the field based on the existing biological conditions.

After the biological survey and mapping of the vegetation communities was completed, an additional evaluation was conducted in the office for each sensitive plant species in the plant inventory. The evaluation considered whether the BSA contained suitable habitats and soils to support those sensitive plant species listed in the plant inventory. A species was determined to have "no potential

to occur" within the BSA if the existing habitats and/or soils in the BSA were clearly absent or unsuitable to support the species. Sensitive plant species with the potential to occur in the BSA is provided in Appendix C.

Biological inventories are generally subject to various survey limitations. Depending on the season and time of day during which biological surveys are conducted, some species may not be detected due to temporal species variability. The reconnaissance-level survey conducted for the proposed project was performed during daylight hours in early winter, thus, some dispersing species or nocturnal species may not have been detected. However, based on the literature review performed, as well as knowledge of species-specific habitat requirements, it is anticipated that any additional species potentially present within the parcel's boundaries can be fairly accurately predicted, and that the survey conducted was sufficient in obtaining a thorough review of the biological resources present on within the parcel's boundaries.

4.0 RESULTS

4.1 Physical Characteristics

The parcel is developed land, landscaped with turf, cart paths, and a man-made biofiltration basin designed to drain developed land, constructed c. May 2018. The proposed project is located in the City's MSCP and coastal overlay zone, and entirely outside the MHPA (City of San Diego 2022).

The parcel is surrounded by isolated ESL which is bound by La Jolla environs near Mount Soledad. The ESL consists primarily of southern maritime chaparral.

Site topography consists of a moderate slope with no jurisdictional drainages present. Elevation ranges from approximately 585-feet above mean sea level (amsl) adjacent to the northeast parcel boundary to approximately 525-feet amsl at the northwest parcel boundary.

Review of the USDA web soil survey indicated two soil mapping units on-site: Gaviota fine sandy loam (GaF, 30 to 50 percent slopes) and Olivenhain cobbly loam (OhF 30 to 50 percent slopes). Gaviota soil series consists of shallow, well-drained fine sandy loams which formed in material weathered from hard sandstone or meta-sandstone.

Olivenhain series consists of well-drained, deep cobbly loam with a cobbly clay subsoil. These soils form in cobbly alluvium (Bowman 1973).

Vegetation communities/land covers that were identified and mapped, and plant and animal species that were observed in the BSA are discussed below.

4.2 Vegetation Communities/Land Covers

Seven vegetation communities/land covers were identified and mapped within the BSA: southern maritime chaparral, scrub oak chaparral, eucalyptus woodland, disturbed wetland, non-native vegetation, disturbed land and developed land (Sawyer, Keeler-Wolf 1995) (Figure 2). Vegetation communities/land covers acreages are summarized in Table 2.

Table 2
Vegetation Communities/Land Covers in the Biological Survey Area

Vegetation Communities/Land Covers	Tier	Total Acres
Southern Maritime Chaparral	Tier I	7.35
Scrub Oak Chaparral	Tier 1	0.50
Eucalyptus Woodland	Tier IV	0.55
Non-Native Vegetation	Tier IV	0.14
Disturbed Land	Tier IV	0.04
Developed Land	Tier IV	6.20
Disturbed Wetland (Man-Made Biofiltration Basin)	N/A	0.10
Total		**14.88**

4.2.1 Southern Maritime Chaparral

Southern maritime chaparral occurs on-sites with weathered sandy soils in the coastal overlay zone. Fire is necessary for the reproductive health of many indicator species. Southern maritime chaparral is characterized by low, fairly open chaparral with the presence of the following indicator species: wart-stemmed ceanothus (*Ceanothus verrucosus*) Del Mar manzanita (*Arctostaphylos glandulosa* spp. *crassifolia*), chamise, (*Adenostona fasciculatum*), Encinitas baccharis (*Baccharis vanessae*), San Diego mountain-mahogany (*Cercocarpus minutiflorus*), sea-dahlia (*Coreopsis maritima*), Torrey pine (*Pinus torreyana*), Nuttall's scrub oak (*Quercus dumosa*), laurel sumac (*Malosma laurina*) and mission manzanita (*Xylococcus bicolor*) (Holland 1986) (Oberbauer 2008). The adjacent ESL is primarily southern maritime chaparral comprised of lemonade berry (*Rhus intregrifolia*), California sagebrush (*Artemisia californica*), buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), bush sunflower (*Encelia californica*), chamise, laurel sumac, and toyon (*Heteromeles arbutifolia*), interspersed with Nuttall's scrub oak (CRPR 1B.1), Torrey pine (CRPR 1B.2), Coast barrel cactus (*ferocactus viridenscens*) (CRPR 2B.1), mountain mahogany, spiny redberry (*Rhamnus crocea*), coast prickly pear (*Opuntia littoralis*), coast cholla (*Cylindropuntia prolifera*), wart-stemmed ceanothus (CRPR 2B.2), and coast desert-thorn (*Lycium californicum*) (CRPR 4.2). Additional sensitive plant species occur in the isolated ESL, outside the mapped BSA, which includes: decumbent goldenbush (*Isocoma menzesii* var. *decumbens*) (CRPR 1B.2), western dichondra (*Dichondra occidentalis*) (CRPR 4.2), and ashy spike-moss (*Selaginella cinerascens*) (CRPR 4.1). Approximately 7.35-acres southern maritime chaparral occurs within the BSA, adjacent to the parcel.

4.2.2 Scrub Oak Chaparral

Scrub oak chaparral is a dense, evergreen chaparral to 20-feet tall, dominated by Nuttall's scrub oak with considerable mountain mahogany (*Cercocarpus betuloides*). In San Diego County, California scrub oak (*Quercus berberidifolia*) is often the dominant (over 50 percent cover) and usually occurs in small patches within a variety of other vegetation communities. In San Diego County, scrub oak chaparral usually occurs on north-facing or otherwise mesic slopes and can occur at various elevations. Indicator species include: Eastwood manzanita (*Arctostaphylos glandulosa*), *Ceanothus* spp., mountain mahogany, toyon, holly-leaf cherry (*Prunus ilicifolia*), *Quercus* spp., holly-leaf redberry (*Rhamnus ilicifolia*), and poison oak (*Toxicodendron diversilobum*). Mountain mahogany, toyon, holly-leaf cherry, and spiny redberry are present in the ESL surrounding Nuttall's scrub oak. Approximately 0.50-acres scrub oak chaparral occurs within the BSA, adjacent to the north, northwest, and southeast parcel boundaries and approximately 200-feet south of the parcel.

4.2.3 Eucalyptus Woodland

Eucalyptus woodland consists primarily of *Eucalyptus* spp. with a limited understory due to the closed canopy and allelopathic nature of the leaf litter. A small portion of the BSA contains eucalyptus woodland with a sparse understory of California sagebrush, California buckwheat and lemonade berry. There is approximately 0.55-acres eucalyptus woodland present within the BSA.

4.2.4 Non-Native Vegetation

Non-native vegetation consists of cultivated plants that have naturalized into otherwise native habitat areas or were put in place by humans, usually for the purpose of beautification, windbreaks or other related purposes and are no longer maintained. Non-native vegetation primarily consists of *Pinus* spp. and *Acacia* spp. A total of approximately 0.14 -acres non-native vegetation occurs in the BSA.

4.2.5 Disturbed Wetland

Disturbed wetlands are areas permanently or periodically inundated by water, which have been significantly modified by human activities. Site factors includes portions of wetlands with obvious artificial structures such as concrete lined channels, barricades, rip-rap, piers, gates, detention basins, culverts or ditches. Disturbed wetlands often are unvegetated, but may contain scattered native or non-native vegetation (Oberbauer 2008). According to the NWI, no wetlands or jurisdictional drainages are located within the parcel boundaries. The 0.10-acres disturbed wetland is a man-made biofiltration basin designed to drain developed land, located in the north portion of the parcel, constructed c. May 2018.

Non-native species have been introduced from the surrounding developed land including several California Invasive Plant Council (Cal-IPC) species. Cal-IPC tracks invasive plants and protects California's environment and ecology from invasive plants. Invasive weeds are rated by their ability to aggressively spread into natural habitat, displacing native plant species.

The disturbed wetland is characterized by cattail (*Typha domingensis*), black willow (*Salix exigua*), umbrella sedge (*Cyperus eragrostis*), California rose (*Rosa californica*), and broom baccharis (*Baccharis sarothroides*). In addition to the aforementioned container plant species installed, non-natives introduced from the surrounding residential development includes: Mexican fan palm (*Washingtonia robusta*) (Cal-IPC Rating: Moderate), pampas grass (*Cortaderia selloana*) (Cal-IPC Rating: High), and tree tobacco (*Nicotiana glauca*) (Cal-IPC Rating: Moderate).

4.2.6 Disturbed Land

Disturbed lands are high traffic areas with compact soil, disturb access roads and trails. Pedestrian and vehicle traffic prohibit the growth of most vegetation in these areas (Holland 1986) (Oberbauer 2008). An approximate five-foot-wide decomposed granite (DG) pedestrian path is located between the project, APN: 352-300-11, and the parcel to the west, APN: 352-300-04. The disturbed land is characterized by a sparse forb layer of non-native vegetation consisting of horseweed (*Erigeron canadensis*), prickly lettuce (*Latuca serriola*), and Bermuda grass (*Cynodon dactylon*). There is approximately 0.04-acres disturbed land present within BSA.

4.2.7 Developed Land

Developed land is land that has been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent structures, hardscape and non-native vegetation landscaped areas requiring artificial irrigation (Oberbauer 2008). The ESL is surrounded by the City of San Diego environs. The project site and the single-family residential estate to the west are developed lands with manicured trees, hedges, turf, ground-cover and hardscape features. There is approximately 6.20- acres developed land within the BSA.

4.3 Jurisdictional Wetlands and Non-Wetland Waters

According to the USFWS National Wetland Inventory, no wetlands or jurisdictional drainages are located on the project site. However, a wetland delineation was conducted for a single ephemeral drainage in the adjacent ESL. The ephemeral drainage is approximately 50 feet east of the driveway, draining southwest to a storm drain inlet at the south dedicated covenant of easement (COE) boundary. Due to the lack of hydrophytic vegetation and hydric soils, the Corps determined the ephemeral drainage is non-wetland WoUS (Dudek 2015). The ephemeral drainage does not meet the City's definition of City-jurisdictional "wetlands" as defined in the City's ESL Regulations and Biological Guidelines (City of San Diego 2012).

The approximate 0.10-acres disturbed wetland is a man-made biofiltration basin, designed to drain developed land, constructed c. May 2018.

4.4 Botanical Resources – Flora

A total of 120 flora species were observed within the BSA. A complete list of floral species observed within the BSA during the reconnaissance-level survey is included in Appendix A.

4.5 Zoological Resources – Fauna

A total of 48 faunal resources observed within the BSA are described below. Biological inventories are generally subject to various survey limitations. Depending on the season and time of day during which field surveys are conducted, some species may not be detected due to temporal species variability. The field survey conducted for the proposed project was performed during daylight hours in early winter, thus, some migratory and nocturnal species may not have been detected. However, based on the literature review performed, as well as knowledge of species-specific habitat requirements, it is anticipated that any additional species potentially present in the BSA can be fairly and accurately predicted, and that the survey conducted was sufficient in obtaining a thorough review of the biological resources present within the BSA. A complete list of faunal species observed or detected within the BSA during the reconnaissance-level survey is included with this report in the wildlife compendium Appendix B.

4.5.1 Invertebrates

No invertebrate species were observed within the BSA during the recent reconnaissance-level survey (Garth J.S. 1986).

4.5.2 Amphibians and Reptiles

Four reptile species observed on-site included western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), Belding's orange-throated whiptail (*Aspidoscelis hyperythrus beldingi*), a CDFW Watch List species (WL), and San Diego ring-necked snake (*Diadophis punctatus similis*) (Lemm JM 2006).

4.5.3 Birds

A total of 40 common wintering, urban and chaparral avian species observed during the reconnaissance-level survey included: yellow-rumped warbler (*Setophaga coronate*), Townsend's warbler (*Setophaga townsendi*), hermit thrush (*Catharus guttatus*), ruby-crowned kinglet (*Regulus calendula*) and white-crowned sparrow (*Zonotrichia leucophrys*) (SDNHM 2022).

Three sensitive avian species included: Cooper's hawk (*Accipiter cooperii*), an MSCP covered species and a CDFW Watch List species (WL), California gnatcatcher (*Polioptila californica californica*), a Federal Threatened species (FT), a CDFW Species of Special Concern (SSC) and an MSCP covered species, protected within the MHPA, and Western bluebird, an MSCP covered species (CDFW 2022) (City of San Diego 1997).

4.5.4 Mammals

Four mammal species were detected in the BSA, San Diego desert woodrat (*Neotoma lepida intermedia*) (midden), a CDFW SSC, coyote (*Canis latrans*), California ground squirrel (*Spermophilius beecheyi*), and desert cottontail (*Sylvilagus audubonii*). Common mammal species with the potential to occur on-site includes: Virginia opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), black rat (*Rattus rattus*), and northern raccoon (*Procyon lotor*). The aforementioned mammals have been observed or detected in the adjacent ESL (Stall 1990) (Jameson 2004).

5.0 FEDERAL, STATE AND LOCAL REGULATIONS

5.1 Federal Endangered Species Act

The U.S. Congress passed the federal Endangered Species Act (ESA) to protect and recover threatened and endangered species and the ecosystems on which they depend. The federal ESA has four components: 1) Section 4 provides listing species and designating critical habitat 2) Section 7 requires agencies, in consultation with the USFWS, to ensure their activities are not likely to jeopardize the existence of species protected under the federal ESA or result in the modification or destruction of critical habitat 3) Section 9 prohibits the "take" of listed species and 4) Section 10 provides permitted incidental "take" of listed species. "Take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect or to attempt to engage in any such conduct (FESA Section 3 [(3)(19)]).

Projects that support or potentially support species protected under the federal ESA are subject to federal ESA regulations.

5.2 Migratory Bird Treaty Act

In 1918, the U.S. Congress passed the Migratory Bird Treaty Act (MBTA) making it illegal to "take," possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any

migratory bird or the parts, nests or eggs of such native migratory birds except under the terms of a valid Federal permit (16 U.S. Code [USC] 703).

Non-native bird species such as house sparrow, European starling, and rock pigeon are not protected under the MBTA. Many groups of game birds such as ducks, geese, doves and many shorebirds are subject to limited protection and can be hunted in season. No permit is required to scare or herd depredating migratory birds excluding endangered or threatened species or bald or golden eagle.

Non-native mature trees in the BSA are suitable for nesting raptors and common bird species protected under the federal MBTA and the CDFG Code, which prohibit the "take" or destruction of migratory birds and raptors, their nests, and/or eggs. Furthermore, noise from construction activities may have the potential to disrupt nesting activities if work is conducted during the breeding season (February 1 through September 15). Thus, the proposed project will comply with the MBTA.

5.3 Clean Water Act

The U.S. Army Corps of Engineers (Corps) regulates discharges of dredged or fill material into WoUS. These waters include wetland and non-wetland bodies of water that meet specific criteria. Corps regulatory jurisdiction pursuant to Section 404 of the CWA is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct, through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce, or may be indirect, through a nexus identified in the Corps regulations.

The Corps typically regulates as WoUS any body of water displaying an ordinary high-water mark (OHWM). Corps jurisdiction over non-tidal WoUS extends laterally to the OHWM or beyond the OHWM to the limit of any adjacent wetlands, if present (33 CFR 328.4). WoUS must exhibit an OHWM or other evidence of surface flow created by hydrologic physical changes. Jurisdiction typically extends upstream to the point where the OHWM is no longer perceptible.

5.4 California Fish and Game Code

The CDFW, through provisions of the California Fish and Game Code (Section 1600 et seq.), is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. Streams (and rivers) are defined by the presence of a channel bed and banks and at least an ephemeral flow of water. The CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by the CDFW.

In obtaining CDFW agreements, the limits of wetlands are not typically determined. The reason for this is that CDFW generally includes, within the jurisdictional limits of streams and lakes, any riparian habitat present. Riparian habitat includes willows, mule fat, and other vegetation typically associated with the banks of a stream or lake shorelines and may not be consistent with Corps definitions. In most situations, wetlands associated with a stream or lake would fall within the limits of riparian habitat. Thus, defining the limits of CDFW jurisdiction based on riparian habitat will automatically include any wetland areas and may include additional areas that do not meet Corps criteria for soils and/or hydrology (e.g., where riparian woodland canopy extends beyond the banks of a stream away from frequently saturated soils).

5.5 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act protects wetlands and waters as Waters of the State (WoS) and designated the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board (RWQCB) as the principal State agency with primary responsibility for the coordination and control of water quality which includes any surface water, groundwater, or saline water within the boundaries of the state. State Resolution 2008-0026 extends jurisdiction of the SWQCB to wetlands as defined in accordance with the federal definition for the CWA.

5.6 California Environmental Quality Act

In 1970, the California Environmental Quality Act was enacted and required State and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts when feasible. Development projects requiring a discretionary governmental approval require at least some environmental review pursuant to CEQA, unless an exemption applies. CEQA does not specifically define what constitutes an "adverse effect" on a biological resource. Instead, lead agencies determine what should be considered a significant impact in accordance with CEQA guidelines (Public Resources Code Sections 21000 - 21189).

5.7 California Endangered Species Act

The California Endangered Species Act (CESA) generally parallels the main provisions of the federal ESA. CESA is administered by the CDFW. It prohibits take of any species that CDFW has classified as threatened or endangered or that is experiencing a significant decline that could lead to such as designation, and permits incidental "take" to otherwise lawful development projects with approval from CDFW (Chapter 1.5 Section [2050 - 2089.26]).

5.8 California Native Plant Protection Act

The California Native Plant Protection Act directs CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The California native Plant Protection Act gives CDFW the power to designate native plants as "endangered" or "rare" and protects such designated plants from "take" (CFGC Section 1900 et seq.)

5.9 California Coastal Act

The California Coastal Commission defines the Coastal Overlay Zone as, "Generally extends 1000 yards inland from the mean high tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to the first major ridgeline or five miles from the mean high tide line, whichever is less." (California Coastal Commission 2019). Development restrictions apply to these areas in order to preserve coastal bluffs, beaches, wetlands, public access (City of San Diego 2012).

5.10 Multiple Species Conservation Program

The City's MSCP Subarea Plan was developed pursuant to the general outline developed by USFWS and CDFW to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The MSCP is a coordinated program between the City, USFWS and CDFW which allows the City to issue "take" authorization for covered species for projects that comply with the MSCP.

The MHPA are lands included in the MSCP for habitat conservation. The MHPA provides the habitat quantity, quality and connectivity to support San Diego's biodiversity and are regarded as sensitive biological resources (City of San Diego 1997).

5.11 City of San Diego Land Development Code Biology Guidelines

The Land Development Code Biology Guidelines were drafted by the City of San Diego Development Services Department to assist in implementing the City's Environmentally Sensitive Lands Regulation, Land Development Code, Open Space Residential Zone Code, and to guide in the determination process for impacts and mitigation under CEQA and the Coastal Act (City of San Diego 2012). The Biology Guidelines guide in the protection of sensitive biological resources including: narrow endemic species, habitat for endangered and threatened species, Tier I, II, IIIA, IIIB, MHPA lands, and those areas inside and outside of the MHPA that qualify as wetlands according to the City of San Diego wetland definition.

5.12 Wetlands – City of San Diego Jurisdiction

The City's ESL regulations defines wetlands regulated under the Land Development Code as areas that meet the following criteria:

1. Areas that contain wetland vegetation, soils or hydrology created by human activities in historically non-wetland areas do not qualify as wetlands under this definition unless they have been delineated as wetland by the Corps or CDFW.

2. Naturally occurring wetland vegetation communities are typically characteristic of wetland areas.

3. Areas lacking naturally occurring wetland vegetation communities are still considered wetlands if hydric soil or wetland hydrology is present and past human activities have occurred to remove the historic vegetation, or catastrophic or recurring natural events preclude the establishment of wetland vegetation.

4. Seasonal drainage patterns that are sufficient enough to etch the landscape may not be sufficient enough to support wetland dependent vegetation. These types of drainages would not satisfy the City's wetland definition unless wetland dependent vegetation is either present in the drainage or lacking due to past human activities.

5. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands will be considered a wetland under the ESL and regulated accordingly. The removal of the fill and restoration of the wetland may be required as a condition of project approval.

Some coastal wetlands, vernal pools and riparian areas have been previously mapped. The maps, labeled C-713 and C-740 are available to aid in the identification of wetlands (City of San Diego 2012).

5.13 City of San Diego Environmentally Sensitive Lands Regulations

The Land Development Code contains development restrictions which occurs within ESL. ESL regulations are intended to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of species supported by those lands." According to these regulations, the potential presence of sensitive biological resources such as southern maritime chaparral and scrub oak

chaparral, within the Coastal Overlay Zone warrant review of the proposed project (City of San Diego 1997).

6.0 SENSITIVE RESOURCES

6.1 City of San Diego Environmentally Sensitive Lands

Sensitive biological resources are uniquely defined by local jurisdictions. Since the lands of the BSA lie within the jurisdiction of the City of San Diego, this report relies upon the City of Diego's definition of "sensitive biological resources", as documented in the San Diego Municipal Code, Land Development Procedures (Chapter 11, Article 3, and Division 1). Based on this definition, sensitive biological resources mean upland and/or wetland areas that meet any one of the following criteria:

(a) Lands that have been included in the City of San Diego MSCP Preserve
(b) Wetlands
(c) Lands outside the MHPA that contain Tier I habitats, Tier II habitats, Tier IIIA habitats, or Tier IIIBhabitats
(d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the Federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code ofRegulations
(e) Lands containing habitats with narrow endemic species as listed in the Biology Guidelines in the Land Development manual
(f) Lands containing habitats of covered species as listed in the Biology Guidelines in the Land Development Manual
(g) Steep hillsides and slopes within the Coastal Overlay Zone

The BSA lies within the City's Coastal Overlay Zone and MSCP, entirely outside of the MHPA, approximately 0.27-miles north of the BSA at La Jolla Natural Park (City of San Diego 2022). The BSA supports approximately 7.35-acres southern maritime chaparral (Tier I), 0.50-acres scrub oak chaparral (Tier I), 0.14-acres non-native vegetation (Tier IV), 0.55-acres eucalyptus woodland (Tier IV), 0.10-acres disturbed wetlands (Tier N/A), 0.04-acres disturbed land (Tier IV) and 6.20-acres developed land (Tier IV) (Figure 3).

The parcel is developed land, landscaped with turf, cart paths, and a man-made biofiltration basin, designed to drain developed land, constructed c. May 2018. The 7.35-acres southern maritime chaparral (Tier I) and 0.50 -acres scrub oak chaparral (Tier I) is located entirely outside of the development area (the work limits and BMZ-1). Consequently, implementation of the project will not result in permanent impacts to sensitive vegetation communities.

According to the NWI, no wetlands or jurisdictional drainages are located within the parcel boundaries. However, there is a jurisdictional ephemeral drainage present, approximately 50 feet east of the driveway, draining southwest to a storm drain inlet at the COE south boundary. The Corps determined the ephemeral drainage is non-wetland WoUS based on the lack of hydrophytic vegetation and hydric soils. The ephemeral drainage does not meet the City's definition of City-jurisdictional "wetlands" as defined in the City's ESL Regulations and Biological Guidelines (Dudek 2015, City of San Diego 2012).

Although there is approximately 0.10-acres disturbed wetland within the parcel boundaries, the disturbed wetland is a storm water conveyance system, a man-made biofiltration basin.

In c. May 2018, the parcel was completely developed with lush turf, cart paths, access gates, French drains and a private driveway. A storm water conveyance system was installed to drain developed land. Thus, implementation of the project will not result in permanent impacts to jurisdictional drainages.

Based on the recent reconnaissance-level survey, known occurrence records (i.e., CDFW, USFWS), and development of the entire parcel, the parcel does not contain sufficient habitat to support or may potentially support sensitive species including City MSCP covered species (Appendix C; Appendix D). No City narrow endemic species were identified within the development area during the reconnaissance-level biological survey and none are expected to occur due to either the introduction of non-native vegetation through extensive development or the lack of sufficient suitable habitat (City of San Diego 1997).

The BSA lies within the City's Coastal Overlay Zone where the City of San Diego ESL regulations and steep hillside guidelines applies. Although steep hillsides occur in the adjacent BSA, east and north of the driveway, no steep hillsides or slopes occur within the parcel boundaries. The parcel is not part of a steep hillside system. Steep hillside systems to the east and north run parallel to the parcel. Parcel topography is moderately sloped. Elevation ranges from approximately 585 feet amsl adjacent to the northeast parcel boundary to approximately 525 feet amsl at the northwest parcel boundary, over a horizontal distance of approximately 435 feet. The slope has a natural gradient of approximately 14 percent and an elevation differential of approximately 60 feet. Thus, the slope has less than 25 percent natural gradient and is not considered steep hillsides as defined in the City's Environmentally Sensitive Lands (ESL) Regulations and Biological Guidelines, and City Land Development Code Steep Hillside Guidelines. Therefore, no impacts to steep hillsides or slopes will occur due to project implementation.

6.2 Critical Habitat

Critical habitat is occupied designated areas which contain features crucial to the conservation of an endangered or threatened species and that may require specific management and protection. Areas that are currently unoccupied that will assist in the recovery of the species may also be designated as critical habitat.

No critical habitat occurs within the BSA. The closest critical habitat is approximately 3.87-miles northeast, adjacent to MCAS Miramar (USFWS 2022). Consequently, implementation of the proposed project will not result in impacts to critical habitat.

Figure 2 – Vegetation Communities and Sensitive Species

6.3 Rare, Threatened, Endemic, Sensitive Species or MSCP Covered Species

Sensitive species are those considered sensitive by the City or any state or federal agency (CDFW 2022) (City of San Diego 1997). For the purposes of this report, species listed as endangered or threatened under the federal Endangered Species Act (ESA) and California Endangered Species Act (CESA); species designated as California Special Concern species or Fully Protected species by the CDFW; and species listed as MSCP narrow endemics by the City (1997) are considered "sensitive." Species considered rare by the California Native Plant Society (CNPS) (2022) or as Special Plants or Animals in the CNDDB (2022), may be considered "sensitive" if they meet the CEQA Guidelines §15380 (Title 14, Chapter 3, Article 20) definition for "endangered, rare or threatened species."

Sensitive flora and fauna species observed within the BSA are discussed below.

6.3.1 Sensitive Flora

This section describes the sensitive flora species detected within the BSA during the reconnaissance-level survey.

Five sensitive flora species, Nuttall's scrub oak (CRPR 1B.1), Torrey pine (CRPR 1B.2), coast barrel cactus (CRPR 2B.1), wart-stemmed ceanothus (CRPR 2B.2), and coast desert-thorn (CRPR 4.2), were located and mapped during the reconnaissance-level survey in the adjacent ESL.

Three additional sensitive plant species occur in the ESL, outside the mapped BSA, decumbent goldenbush (CRPR 1B.2), western dichondra (CRPR 4.2), and ashy spike-moss (CRPR 4.1).

The development area is void of sensitive flora species. Consequently, no direct impacts to sensitive flora species will occur due to project implementation.

An evaluation of the potential for sensitive flora species to occur within the BSA was conducted, based on suitable habitat, and site conditions. Appendix C includes a complete list of the sensitive flora species detected or evaluated for the potential to occur on-site, with their respective status, suitable habitat, and an assessment of their potential for occurrence (CDFW 2022) (CNPS 2022).

6.3.2 Sensitive Fauna

Five sensitive wildlife species were observed in the BSA during the reconnaissance-level survey: Belding's orange-throated whiptail (WL, MSCP covered), San Diego desert woodrat (midden) (SSC), Cooper's hawk, (WL, MSCP covered), California gnatcatcher (FT, SSC, MSCP covered, protected within the MHPA), and western bluebird (MSCP covered).

Cooper's hawk was observed in the BSA during the reconnaissance-level survey. A Cooper's hawk was observed actively ambushing passerines on the adjacent Foxhill Estate parcel.

Two pair California gnatcatcher were observed in the isolated ESL, one pair in the west portion of the BSA and a second pair south of the BSA, during the reconnaissance-level survey (CDFW 2022) (City of San Diego 1997).

A pair of western bluebird were observed flying over the BSA during the reconnaissance-level survey.

San Diego woodrat (midden) was observed in the south portion of the BSA during the reconnaissance-level survey.

Two Belding's orange-throated whiptails were observed south of the BSA during the reconnaissance-level survey.

An evaluation of the potential for sensitive fauna species to occur within the BSA was conducted, based on suitable habitat, and/or site conditions. Appendix D includes a complete listing of the sensitive wildlife species detected or evaluated for the potential to occur on-site, with their respective status, suitable habitat, and an assessment of their potential for occurrence (CDFW 2022) (USFWS 2022).

6.4 Wildlife Corridors

Wildlife corridors are important in preserving species diversity. In the absence of corridors, habitats become isolated islands surrounded by development. Fragmented habitats support lower numbers of species and increase the likelihood of extinction for species restricted to small areas. Connections between areas of open space are integral to maintaining biological diversity and population viability. For the purposes of this report, we have defined wildlife corridor as follows: a linear landscape feature utilized by resident or transient wildlife for movement between two blocks of habitat (City of San Diego 2012).

Based on the topography, habitat connectivity and cover, identified and/or potential species within the BSA, and land uses, the BSA possess low value as a wildlife corridor. The parcel is developed land, void of naturally occurring vegetation communities. The parcel is primarily landscaped with well-maintained turf, cart paths, and a man-made biofiltration basin designed to drain developed land, constructed c. May 2018. Although natural lands consisting primarily of southern maritime chaparral exists within the adjacent ESL, the ESL is isolated, surrounded by dense residential development. The closest wildlife corridor is Rose Canyon Open Space, approximately 1.43-miles east of the BSA (CDFW 2022). Consequently, use by terrestrial animals with a north-south or east-west home-range movement would be unlikely.

7.0 PROJECT IMPACT ANALYSIS

7.1 CEQA Thresholds of Significance

State CEQA Guidelines §15065 (a) (Title 14, Chapter 3, Article 5) states, "A project may have significant effects on the environment" if:

- "The project has the potential to substantially 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; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory."

- "The project has possible environmental effects which are individually limited but cumulatively considerable."

In addition, the City has developed Significance Determination Thresholds and Biology Guidelines under CEQA (City of San Diego 2012).

The following analysis identifies potential impacts to biological resources that could result from implementing the proposed project. This report was prepared to satisfy the regulations of several different agencies that recognize temporary and permanent impact classification, in addition to the City that generally recognizes only permanent impacts. Both classifications of impacts are discussed and quantified in the following section.

7.2 Direct Impacts

7.2.1 Vegetation Communities

The proposed project has been designed to avoid potential impacts the maximum extent practicable. The development area is developed land and disturbed wetlands, void of sensitive vegetation communities. The parcel is primarily landscaped with well-maintained turf, cart paths, and a man-made biofiltration basin designed to drain developed land, constructed c. May 2018. According to the City of San Diego's Significance Determination Guidelines under the California Environmental Quality Act, direct impacts to developed lands are considered less-than-significant. Thus, no impacts to sensitive vegetation communities will occur due to project implementation (City of San Diego 2016).

7.2.2 Jurisdictional Wetlands and Non-Wetland Waters

According to the NWI, no wetlands or jurisdictional drainages are located within the parcel boundaries. However, there is a jurisdictional ephemeral drainage present approximately 50 feet east of the driveway, draining southwest to a storm drain inlet at the ESL south boundary. The Corps determined the ephemeral drainage is non-wetland WoUS based on the lack of hydrophytic vegetation and hydric soils. The ephemeral drainage does not meet the City's definition of City-jurisdictional "wetlands" as defined in the City's ESL Regulations and Biological Guidelines (Dudek 2015, City of San Diego 2012).

Although there is approximately 0.10-acres disturbed wetland within the parcel boundaries, the disturbed wetland is a storm water conveyance system, a man-made biofiltration basin.

In c. May 2018, the parcel was completely developed with lush turf, cart paths, access gates, French drains and a private driveway. The storm water conveyance system was installed to drain developed land. Therefore, no impacts to jurisdictional wetlands will occur as a result of project implementation.

7.2.3 Sensitive Flora

Five sensitive flora species, Nuttall's scrub oak (CRPR 1B.1), Torrey pine (CRPR 1B.2), coast barrel cactus (CRPR 2B.1), wart-stemmed ceanothus (CRPR 2B.2), and coast desert-thorn (CRPR 4.2), were located and mapped within the BSA during the reconnaissance-level survey in the adjacent ESL. Three additional sensitive plant species occur in the ESL, outside the mapped BSA, decumbent goldenbush (CRPR 1B.2), western dichondra (CRPR 4.2), and ashy spike-moss (CRPR 4.1).

Although sensitive flora species occur adjacent to the parcel, no sensitive flora occur within the parcel boundaries. The parcel is developed land and disturbed wetland, a man-made biofiltration basin, void of sensitive flora species. Consequently, no direct impacts to sensitive flora species will occur due to project implementation.

7.2.4 Sensitive Fauna

Five sensitive wildlife species were observed in the BSA during the reconnaissance-level survey: Belding's orange-throated whiptail (WL, MSCP covered), San Diego desert woodrat (midden) (SSC), Cooper's hawk, (WL, MSCP covered), California gnatcatcher (FT, SSC, MSCP covered, protected within the MHPA), and western bluebird (MSCP covered). Although sensitive wildlife species were observed in the BSA, no suitable habitat occurs within the parcel boundaries. The parcel is developed land, primarily turf and cart paths. Therefore, no direct impacts to sensitive wildlife species will occur due to project implementation (SDNHM 2022).

7.2.5 Sensitive Flora and Fauna Species with Potential to Occur

Potential occurrences of sensitive flora and fauna species were assessed in the field based on the existing biological conditions. After the reconnaissance-level survey was completed, an additional evaluation was conducted in the office for each sensitive flora and fauna species in the inventory. The evaluation considered whether the BSA contained suitable habitats and soils to support those sensitive flora and fauna species listed in the inventory. Based on the survey and review, it is unlikely for sensitive flora and fauna species to occur on-site due to the lack of sufficient suitable habitat. No direct impacts to sensitive flora and fauna species with the potential to occur is anticipated due to project implementation.

7.2.6 Wildlife Corridors

Based on the topography, habitat connectivity and cover, identified and/or potential species within the BSA, and land uses, the BSA possess low value as a wildlife corridor. The parcel is developed land, void of native vegetation communities. The parcel is primarily landscaped with well-maintained turf, cart paths, and a man-made biofiltration basin designed to drain developed land, constructed c. May 2018. Although native vegetation communities consisting primarily of southern maritime chaparral exists within the adjacent ESL, the ESL is isolated, surrounded by dense residential development. The closest wildlife corridor is Rose Canyon Open Space, approximately 1.43-miles east of the BSA (CDFW

2022). Therefore, use by terrestrial animals with a north-south or east-west home-range movement would be unlikely.

7.2.7 Upland Habitat Direct Impacts

No sensitive upland vegetation communities occur within the development area: Project activities are confined to developed lands. Consequently, no impacts to sensitive vegetation communities will occur due to project implementation (City of San Diego 2022).

Summary of impacts to vegetation communities and land covers are provided in Table 3.

Table 3
Summary of Impacts to Vegetation Communities (acres)

Vegetation Community/Land Covers	Tier	Temporary Impact	Permanent Impact	Total Impacts
Developed Land	IV	4.10	0.00	4.10
Disturbed Wetlands (Man-Made Biofiltration Basin)	N/A	0.10	0.00	0.10
Total	--	4.20	0.00	4.20

7.3 Indirect Impacts

CEQA guidelines §15358 define an "indirect impact or secondary effect" as "effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable" that can produce a temporary or permanent biologically significant, "physical change" in the environment.

Suitable Cooper's hawk nesting sites lie adjacent to the development area, on the parcel to the west and north. Noise from construction activities have the potential to disrupt nesting activities, resulting in indirect impacts to Cooper's hawk during the breeding season (February 1 through September 15). Therefore, mitigation measures are provided in Section 8.0 Mitigation and Monitoring Requirements.

The proposed project will not result in potential significant indirect impacts such as noise, dust, interruption of wildlife movement, or sedimentation of downstream wetland environments.

7.4 Cumulative Impacts

CEQA guidelines §15355 define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The MSCP was designed to compensate for the loss of biological resources throughout the program's region; therefore, projects that conform to the MSCP would not result in a cumulatively considerable impact for those biological resources adequately covered by the program. There are no direct or indirect impacts anticipated as a result of implementation of the proposed project.

8.0 MITIGATION AND MONITORING REQUIREMENTS

No impacts to sensitive vegetation communities will occur due to project implementation. According to the City of San Diego's Significance Determination Guidelines under the California Environmental Quality Act, direct impacts to developed lands do not require mitigation. Therefore, impacts to developed lands within the development area are considered less-than-significant (City of San Diego 2016).

Suitable Cooper's hawk habitat is present adjacent to the development area. Noise from construction activities have the potential to result in impacts to Cooper's hawk during the breeding season (February 1 through September 15). Therefore, the following mitigation measures are provided to reduce impacts to a less-than-significant level.

Due to the project's adjacency to suitable Cooper's hawk habitat, construction activities will occur outside of the breeding season (February 1 through September 15). If construction activities occur during the breeding season, a Qualified Biologist will conduct a pre-construction survey to determine the presence/absence of Cooper's hawk. The pre-construction survey will be conducted within 10 days prior to the commencement of construction activities. The applicant will submit the results of the preconstruction survey to the City Development Services Department for review and approval prior to initiating any construction activities.

If Cooper's hawk is detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal regulations will be prepared and include proposed measures to implemented to ensure that take" of birds or eggs or disturbance of breeding activities is avoided. If Cooper's hawk is present, a 300-foot avoidance buffer will be established around an active nest consistent with the City MSCP Subarea Plan and the Biology Guidelines (2012). The report or mitigation plan will be submitted to the City Development Services Department for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Qualified Biologist will verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If this evidence concludes that no impacts on this species are anticipated, no mitigation measures will be necessary.

9.0 BRUSH MANAGEMENT PLAN

A brush management plan will be implemented pursuant to San Diego Municipal Code Section 142.0412. The proposed project is entirely developed lands and disturbed wetland, a man-made biofiltration basin. However, the proposed project borders ESL which contains highly flammable, rare vegetation communities. Brush management is needed to reduce fire hazards around structures and to help firefighters protect life and property if fire does occur. A Final Brush Management Plan is provided with the site plans.

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APPENDIX A
FLORA COMPENDIUM

FLORA SPECIES OBSERVED ON-SITE			
FAMILY	**SCIENTIFIC NAME**	**COMMON NAME**	**HABITAT**
Fabaceae	*Acacia* spp. ‡	Acacia	DEV
Fabaceae	*Acmispon glaber*	Deerweed	SMC
Rosaceae	*Adenostoma fasciculatum*	Chamise	SMC
Amaryllidaceae	*Agapanthus africanus* ‡	Agapanthus	DEV
Asparagaceae	*Agave tequilana* ‡	Blue agave	DEV
Betulaceae	*Alnus glutinosa* ‡	Common alder	DEV
Araucariaceae	*Araucaria heterophylla* ‡	Norfolk Island pine	DEV
Asteraceae	*Artemisia californica*	California sagebrush	SMC
Liliaceae	*Asphodelus fistulosus* ‡	Onionweed	DL
Fabaceae	*Astragalus trichopodusa*	Coast locoweed	SMC
Asteraceae	*Baccharis pilularis*	Coyote brush	SMC
Asteraceae	*Baccaris sarothroides*	Broom baccharis	SMC, DW
Nyctaginaceae	*Bougainvillea* spp. ‡	Bougainvillia	DEV
Brassicaceae	*Brassica nigra* ‡	Black mustard	DL
Poaceae	*Bromus madritensis sspp. rubens* ‡	Red brome	DL
Convolvulaceae	*Calystegia macrostegia*	Mourning glory	SMC
Theaceae	*Camellia* spp. ‡	Camellia	DEV
Apocynaceae	*Carissa macrocarpa* ‡	Natal plum	DEV
Aizoaceae	*Carpobrotus edulis* ‡	Hottentot fig	DEV
Rhamnaceae	*Ceanothus verrucosus* (CRPR 2B.2)	Wart-stemmed ceanothus	SMC
Rosaceae	*Cercocarpus minutiflorus*	Mountain mahogany	SMC
Euphorbiaceae	*Chamaesyce maculate* ‡	Spotted spurge	DL
Chenopodiaceae	*Chenopodium murale* ‡	Nettle-leaf goosefoot	DL
Amaryllidaceae	*Clivia miniate* ‡	Natal lily	DEV
Convolvulaceae	*Convolvulus arvensis* ‡	Bindweed	DL
Poaceae	*Cortaderia selloana* ‡	Pampas grass	DW
Crassulaceae	*Crassula ovata* ‡	Jade plant	DEV
Crocoideae	*Crocus* spp. ‡	Crocus	DEV
Iridaceae	*Crocosmia* spp. ‡	Crocosmia	DEV
Boraginaceae	*Cryptantha* spp.	Forget-me-not	SMC
Sapindaceae	*Cupaniopsis anacardioides* ‡	Carrotwood tree	DEV
Cactaceae	*Cylindropuntia prolifera*	Coastal cholla	SMC
Asteraceae	*Cynara cardunculus* ‡	Artichoke thistle	DL

FLORA SPECIES OBSERVED ON-SITE			
FAMILY	**SCIENTIFIC NAME**	**COMMON NAME**	**HABITAT**
Poaceae	*Cynodon dactylon* ǂ	Bermuda grass	DL
Cyperaceae	*Cyperus eragrostis*	Umbrella sedge	DW
Convolvulaceae	*Dichondra occidentalis* (CRPR 4.2)	Western dichondra	SMC
Poaceae	*Digitaria sanguinalis* ǂ	Crab grass	DL
Phrymaceae	*Diplacus aurantiacus*	Bush monkeyflower	SMC
Crassulaceae	*Dudleya edulis*	Lady-fingers	SMC
Crassulaceae	*Dudleya pulverulenta*	Chalk dudleya	SMC
Boraginaceae	*Echium candicans* ǂ	Pride of Madeira	DEV
Poaceae	*Elymus condensatus*	Giant wild-rye	SMC
Asteraceae	*Encelia californica*	Bush sunflower	SMC
Asteraceae	*Erigeron canadensis*	Horseweed	DL
Polygonaceae	*Eriogonum fasciculatum*	California buckwheat	SMC
Asteraceae	*Eriophyllum confertiflorum*	Golden yarrow	SMC
Fabaceae	*Erythrina* spp. ǂ	Coral tree	DEV
Myrtaceae	*Eucalyptus* spp. ǂ	Eucalyptus	EUC
Euphorbiaceae	*Euphorbia maculate* ǂ	Spotted spurge	DL
Cactaceae	*Ferocactus viridescens* (CRPR 2B.1)	Coast barrel cactus	SMC
Moraceae	*Ficus* spp. ǂ	Ficus tree	DEV
Apiaceae	*Foeniculum vulgare* ǂ	Sweet fennel	DL
Asteraceae	*Gazania linearis* ǂ	Gazania	DEV
Araliaceae	*Hedera helix* ǂ	English ivy	DEV
Rosaceae	*Heteromeles arbutifolia*	Toyon	SMC
Asteraceae	*Heterotheca grandiflora*	Telegraph weed	DL
Iridaceae	*Iris* spp. ǂ	Iris	DEV
Asteraceae	*Isocoma menziesii*	San Diego goldenbush	SMC
Asteraceae	*Isocoma menziesii var. decumbens* (CRPR 1B.2)	Decumbent goldenbush	SMC
Bignoniaceae	*Jacaranda mimosifolia* ǂ	Jacaranda tree	DEV
Cupressaceae	*Juniperus* spp. ǂ	Juniper	DEV
Asteraceae	*Lactuca serriola*	Prickly lettuce	DL
Verbenaceae	*Lantana* spp. ǂ	Lantana	DEV
Plumbaginaceae	*Limonium perezii* ǂ	Canary Island sea lavender	DEV
Brassicaceae	*Lobularia maritima* ǂ	Sweet alyssum	DEV
Solanaceae	*Lycium californicum* (CRPR 4.2)	Coast desert-thorn	SMC

FLORA SPECIES OBSERVED ON-SITE			
FAMILY	**SCIENTIFIC NAME**	**COMMON NAME**	**HABITAT**
Magnoliaceae	*Magnolia virginiana* ǂ	Magnolia	DEV
Malvaceae	*Malacothamnus fasciculatus*	Chaparral bush mallow	SMC
Anacardiaceae	*Malosma laurina*	Laurel sumac	SMC
Fabaceae	*Medicago polymorpha* ǂ	Bur clover	DL
Nyctaginaceae	*Mirabilis laevis*	Wishbone bush	SMC
Scrophulariaceae	*Myoporum laetum* ǂ	Myoporum tree	DEV
Solanaceae	*Nicotiana glauca* ǂ	Tree tobacco	DL
Onagraceae	*Oenothera elata* sspp. *hirsutissima*	Marsh evening primrose	DW
Cactaceae	*Opuntia littoralis*	Coast prickly pear	SMC
Oxalidaceae	*Oxalis pes-caprae* ǂ	Bermuda buttercup	DL
Cleomaceae	*Peritoma arborea*	Bladderpod	SMC
Rosaceae	*Photinia* spp. ǂ	Photinia	DEV
Pinaceae	*Pinus halepensis* ǂ	Aleppo pine	DEV
Pinaceae	*Pinus* spp. ǂ	Pine	NNV
Pinaceae	*Pinus torreyana* (CRPR 1B.2)	Torrey pine	SMC
Anacardiaceae	*Pistacia chinensis* ǂ	Chinese pistache	DEV
Pittosporaceae	*Pittosporum spp.* ǂ	Pittosporum	DEV
Platanaceae	*Platanus acerifolia* ǂ	London plane	DEV
Plumbaginaceae	*Plumbego auriculata* ǂ	Blue plumbego	DEV
Poaceae	*Poa* spp. ǂ	Kentucky bluegrass/rye grass/fescue blend, Bermuda/turf hybrids (Pompano)	DEV
Salicaceae	*Populus* spp. ǂ	Poplar	DEV
Rosaceae	*Prunus ilicifolia*	Holly-leaf cherry	SMC
Asteraceae	*Pseudognaphalium bioletti*	Bicolor everlasting	SMC
Rosaceae	*Pyracantha* spp. ǂ	Pyracantha	DEV
Rosaceae	*Pyrus calleryana* ǂ	Ornamental pear tree	DEV
Fagaceae	*Quercus dumosa* (CRPR 1B.1)	Nuttall's scrub oak	SOC
Rhamnaceae	*Rhamnus crocea*	Spiny redberry	SMC
Anacardiaceae	*Rhus integrifolia*	Lemonade berry	SMC
Grossulariaceae	*Ribes speciosum*	Fuchsia-flowered gooseberry	SMC
Rosaceae	*Rosa* spp.	Rose	DEV
Rosaceae	*Rosa californica*	California rose	DW
Lamiaceae	*Rosmarinus officinalis* ǂ	Rosemary	DEV

FLORA SPECIES OBSERVED ON-SITE			
FAMILY	**SCIENTIFIC NAME**	**COMMON NAME**	**HABITAT**
Salicaceae	*Salix gooddingii*	Black willow (one sapling)	DW
Chenopodiaceae	*Salsola tragus* ǂ	Tumbleweed	DL
Lamiaceae	*Salvia apiana*	White sage	SMC
Lamiaceae	*Salvia mellifera*	Black sage	SMC
Anacardiaceae	*Schinus mole* ǂ	Peruvian pepper	DEV
Selaginellaceae	*Selaginella cinerascens* (CRPR 4.1)	Ashy spike-moss	SMC
Iridaceae	*Sisyinchium bellum*	Blue-eyed grass	SMC
Solanaceae	*Solanum parishii*	Parish's nightshade	SMC
Asteraceae	*Sonchus asper*ǂ	Prickly sow thistle	DL
Strelitziaceae	*Strelitzia* spp. ǂ	Bird-of-paradise	DEV
Asteraceae	*Stephanomeria* spp.	Wreath-plant	SMC
Poaceae	*Stipa pulchra*	Purple needlegrass	SMC
Asteraceae	*Taraxacum officinale* ǂ	Common dandelion	DL
Bignoniaceae	*Tecoma capensis* ǂ	Cape honeysuckle	DEV
Commelinaceae	*Tradescantia fluminensis* ǂ	Wandering jew	DEV
Tropaeolaceae	*Tropaeolum* spp. ǂ	Nasturtium	DEV
Typhaceae	*Typha domingensis*	Cattail	DW
Pinaceae	*Tsuga* spp. ǂ	Hemlock	DEV
Urticaceae	*Urtica urens* ǂ	Dwarf nettle	DL
Adoxaceae	*Viburnum* spp. ǂ	Viburnum	DEV
Arecaceae	*Washingtonia robusta* ǂ	Mexican fan palm	DW
Agavaceae	*Yucca schidigera*	Spanish bayonet	SMC
SMC = southern maritime chaparral, DL = disturbed land, DEV = developed land, DW = disturbed wetland NNV = non-native vegetation, SOC = scrub oak chaparral, EUC = eucalyptus woodland, ǂ = non-native vegetation			

APPENDIX B
WILDLIFE COMPENDIUM

WILDLIFE COMPENDIUM	
COMMON NAME	**SCIENTIFIC NAME**
Mammals	**Cricetidae**
***San Diego desert woodrat (midden)**	***Neotoma lepida intermedia***
Mammals	**Canidae**
Coyote	*Canis latrans*
Mammals	**Scuridae**
California ground squirrel	*Spermophilius beecheyi*
Mammals	**Leporidae**
Desert cottontail	*Sylvilagus audubonii*
Reptile	**Phrynosomatidae**
Western fence lizard	*Sceloporus Occidentalis*
Side-blotched lizard	*Uta stansburiana*
Reptile	**Teiidae**
***Belding's orange-throated whiptail**	***Aspidoscelis hyperythrus beldingi***
Reptile	**Colubridae**
San Diego ring-necked snake	*Diadophis punctatus similis*
Hawks, Kites, Eagles and Allies	**Accipitridae**
***Cooper's hawk**	***Accipiter cooperii***
Red-shouldered hawk	*Buteo lineatus*
Red-tailed hawk	*Buteo jamaicensis*
Pigeons and Doves	**Columbidae**
Mourning dove	*Zenaida macroura*
Hummingbirds	**Trochilidae**
Anna's hummingbird	*Calypte anna*
Allen's hummingbird	*Selasphorus sasin*
Woodpeckers and Allies	**Picidae**
Nuttall's woodpecker	*Picoides nuttallii*
Northern flicker	*Colaptes auratus*
Tyrant Flycatchers	**Tyrannidae**
Black phoebe	*Sayornis nigricans*
Say's phoebe	*Sayornis saya*
Cassin's kingbird	*Tyrannus vociferans*
Vireos	**Vireonidae**
Hutton's vireo	*Vireo huttoni*
Jays and Crows	**Corvidae**
California scrub-jay	*Aphelocoma californica*
American crow	*Corvus brachyrhynchos*
Common raven	*Corvus corax*
Bushtits	**Remizidae**
Bushtit	*Psaltriparus minimus*

WILDLIFE COMPENDIUM	
COMMON NAME	**SCIENTIFIC NAME**
Nuthatches	**Sittidae**
Red-breasted nuthatch	*Sitta canadensis*
Wrens	**Troglodytidae**
Bewick's wren	*Thryomanes bewickii*
House wren	*Troglodytes aedon*
Gnatcatchers and Gnatwrens	**Poliptilidae**
Blue-gray gnatcatcher	*Polioptila caerulea*
***California gnatcatcher**	***Polioptila californica californica***
Kinglets	**Regulidae**
Ruby-crowned kinglet	*Regulus calendula*
Sylviid Warblers	**Syviidae**
Wrentit	*Chamaea fasciata*
Thrushes	**Turdidae**
***Western bluebird**	***Sialia mexicana***
Hermit thrush	*Catharus guttatus*
American robin	*Turdus migratorius*
Mockingbirds and Thrashers	**Mimidae**
California thrasher	*Toxostoma redivivum*
Northern mockingbird	*Mimus polyglottos*
Waxwings	**Bombycillidae**
Cedar waxwing	Bombycilla cedrorum
Wood-Warblers	**Parulidae**
Orange-crowned warbler	*Oreothlypis celata*
Yellow-rumped warbler	*Setophaga coronata*
Townsend's warbler	*Setophaga townsendi*
Emberizids	**Emberizidae**
Spotted towhee	*Pipilo maculatus*
California towhee	*Melozone crissalis*
Song sparrow	*Melospiza melodia*
White-crowned sparrow	*Zonotrichia leucophrys*
Dark-eyed junco	*Junco hyemalis*
Waxbills	**Estriididae**
Scaly-breasted munia	*Lonchura punctulata*
Finches and Allies	**Fringillidae**
House finch	*Haemorhous mexicanus*
Lesser goldfinch	*Spinus psaltria*

Indicates special-status species

APPENDIX C
REGIONAL SENSITIVE PLANT SPECIES

Appendix C Regional Sensitive Species					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS ***	**GENERAL HABITAT DESCRIPTION**	**HABITAT OR SPECIES PRESENT /**	**RATIONALE**
PLANTS					
Pinus torreyana	Torrey pine	SE/FE CRPR 1B.2 MSCP Narrow Endemic	**Distribution:** Chaparral, closed-cone coniferous forest. **Habitat:** Limited to fog belt.	SP	No suitable habitat occurs on-site. Species present adjacent to parcel in BSA.
Adolphia californica	California adolphia	--/-- CRPR List 2B.1	**Distribution**: Chaparral, coastal sage scrub, valley and foothill grassland. **Habitat**: Found in sandy/gravelly to clay soils within grassland, coastal sage scrub or chaparral.	HP	No suitable habitat occurs on-site. However, suitable habitat occurs adjacent to parcel in BSA.
Acanthomintha ilicifolia	San Diego thorn-mint	SE/FT CRPR List 1B.1 MSCP Narrow Endemic	**Distribution**: Chaparral, coastal scrub, valley and foothill grassland, vernal pools **Habitat**: Endemic to active vertisol clay soils of mesas and valleys. Usually on clay lenses within grassland or chaparral communities.	A	No suitable soils or habitat occurs on-site.
Aphanisma blitoides	Aphanisma	--/-- CRPR List 1B.2 MSCP NE MSCP Narrow Endemic	**Distribution**: Coastal bluff scrub, coastal dunes and coastal scrub. **Habitat**: On bluffs and slopes near the ocean in sandy or clay soils.	A	No suitable soils or habitat occurs on-site or in BSA. Parcel completely developed.
Artemisia palmeri	San Diego sagewort	--/-- CRPR List 4.2 MSCP Covered	**Distribution**: Coastal scrub, chaparral, riparian forest, riparian woodland, riparian scrub **Habitat**: In drainages and riparian areas in sandy soil within chaparral and other habitats	HP	No suitable soils or habitat occur on-site due to extensive development. Suitable habitat in adjacent BSA.

Appendix C **Regional Sensitive Species** (cont.)					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS ***	**GENERAL HABITAT DESCRIPTION**	**HABITAT OR SPECIES PRESENT**	**RATIONALE**
PLANTS (cont.)					
Atriplex pacifica	South coast saltscale	--/-- CRPR List 1B.2 MSCP Covered	**Distribution**: Coastal scrub, coastal bluff scrub, playas, coastal dunes. **Habitat**: Alkali soils.	HP	No suitable habitat occurs on-site. Parcel completely developed. However, suitable habitat occurs in adjacent BSA.
Atriplex coulteri	Coulter's saltbush	--/-- CRPR List 1B.2	**Distribution**: Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. **Habitat**: Ocean bluffs, ridgetops, alkaline low places. Alkaline or clay soils.	HP	No suitable habitat occurs on-site. Parcel completely developed. However, habitat present in adjacent BSA.
Chaenactis glabriuscula var. orcuttiana	Orcutt's pincushion	--/-- CRPR List 1B.1 MSCP Covered MSCP	**Distribution**: Coastal bluff scrub and dunes. **Habitat**: Sandy sites.	A	No suitable habitat occurs on-site or the BSA.
Chorizanthe orcuttiana	Orcutt's spineflower	FE/SE CRPR List 1B.1 MSCP Covered	**Distribution**: Coastal scrub, chaparral, closed-cone coniferous forest. **Habitat**: Sandy sites and openings, sometimes in transition zones.	HP	No suitable habitat occurs on-site; however, suitable habitat present in BSA
Dudleya viscida	Sticky dudleya	--/-- CRPR 1B.1 MSCP Covered	**Distribution:** Coastal scrub, coastal bluff scrub, chaparral, cismontane woodland. On north and south-facing cliffs and banks.	A	No suitable habitat on-site or in BSA.
Ferocactus viridenscens	San Diego barrel cactus	--/-- CRPR List 2B.1 MSCP Covered	**Distribution**: Chaparral, coastal scrub, valley and foothill grassland. **Habitat**: Often on exposed, level or south facing slopes; often coastal scrub near crest of slopes.	SP	No suitable habitat occurs on-site. Parcel completely developed. However, species occurs in BSA.
Isocoma menziesii var. decumbens	Decumbent goldenbush	--/-- CRPR List - 1B.2	**Distribution**: Coastal scrub, chaparral. **Habitat**: Occurs in sandy soils; often in disturbed sites.	SP	No suitable habitat within parcel. However, species observed outside of BSA, near Country Club Dr.

Appendix C **Regional Sensitive Species** (cont.)					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS ***	**GENERAL HABITAT DESCRIPTION**	**HABITAT OR SPECIES PRESENT**	**RATIONALE**
PLANTS (cont.)					
Ceanothus verrucocus	Wart-stemmed ceanothus	--/-- CRPR 2B.2 MSCP Covered	**Distribution:** Chaparral **Habitat:** Occurs along coast	SP	No suitable habitat occurs on-site. Parcel completely developed. However, species occurs in BSA.
Leptosyne maritima	Sea dahlia	--/-- CRPR List 2B.2	**Distribution**: Coastal bluff scrub, coastal scrub **Habitat**: Occurs on a variety of soil types, including sandstone.	HP	No suitable habitat occurs on-site. Parcel completely developed. However, habitat present in BSA.
Dudleya brevifolia	Short-leaved dudleya	SE/-- CRPR 1B.1 MSCP Narrow Endemic	**Distribution:** Chaparral, coastal scrub **Habitat**: On Torrey sandstone soils; in pebbly openings.	A	No suitable habitat present on-site or within BSA.
Quercus dumosa	Nuttall's scrub oak	--/-- CRPR 1B.1	**Distribution**: Closed-cone coniferous forest, chaparral, coastal scrub **Habitat:** Sandy soils near the coast; sometimes on clay loam.	SP	No suitable habitat on-site. Parcel completely developed. However, species occurs in BSA.
Dudleya variegata	Variegated dudleya	--/-- CRPR 1B.2 MSCP Narrow Endemic	**Distribution:** Chaparral, coastal scrub, cismontane woodland valley and foothill grassland. **Habitat:** In rocky or clay soils, sometimes associated with vernal pool margins.	A	No suitable habitat on-site or BSA.
Eryngium arisulatum var. parishii	San Diego button-celery	FE/SE CRPR 1B.1 MSCP Narrow Endemic	**Distribution:** Vernal pools, coastal sage scrub, valley and foothill grassland. **Habitat:** San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools. Usually surrounded by scrub.	A	No suitable habitat or claypan present on-site or in the BSA.
Euphorbia misera	Cliff spurge	--/-- CRPR 2B.2	**Distribution:** Coastal bluff scrub, coastal scrub. **Habitat:** Rocky sites.	A	No suitable habitat on-site or BSA.
Selaginella cinerascens	Ashy spike-moss	--/-- CRPR List 4.1	**Distribution**: Clay soils, open areas and shade of larger plants. **Habitat**: Chaparral coastal scrub	SP	No suitable habitat on-site. Species occurs in adjacent to BSA near Country Club Drive.

Appendix C **Regional Sensitive Species** (cont.)					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS***	**GENERAL HABITAT DESCRIPTION**	**HABITAT PRESENT/ ABSENT†**	**RATIONALE**
WILDLIFE (cont.)					
Invertebrates					
Insects					
Vertebrates					
Amphibians and Reptiles					
Anniella stebbinsi	Southern California legless lizard	--/SSC	**Distribution:** Occurs in sandy or loose loamy soils under sparse vegetation. **Habitat:** Variety of habitats; generally in moist, lose soil. Prefers soils with high moisture contents.	HP	No suitable habitat or soils occurs on-site. Parcel completely developed. However, habitat occurs in BSA.
Aspidoscelis hyperythrus ssp. *beldingi*	Belding's orange-throated whiptail	--/WL MSCP Covered	**Distribution**: Ranges from southern Orange County and southern San Bernardino County (Colton) south to the cape of Baja **Habitat**: Generally inhabits sandy substrates in coastal sage scrub, chaparral, edges of riparian woodlands, and washes. Can also be found in weedy, disturbed areas adjacent to these habitats. Important requirements for orange-throated whiptail populations include a mosaic of open, sunny areas and shade for thermoregulation.	SP	No suitable habitat occurs on-site. Parcel completely developed. However, species occurs in BSA.
Vertebrates					
Birds					
Falco peregrinus anatum	American peregrine falcon	--/-- MSCP Covered	**Distribution:** Near wetlands, and other water; on cliffs, banks, dunes mounds and human-made structures **Habitat:** Nest consists of a scrape on ledge in open space.	A	No suitable habitat occurs on-site or within the BSA.
Accipiter cooperi	Cooper's hawk	--/WL MSCP Covered	**Distribution**: Occurs year-round throughout San Diego County's coastal slope where stands of trees are present **Habitat**: Found in oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests.	SP	No suitable habitat on-site. Parcel completely developed. Species observed in BSA. Avoidance measures will be implemented in accordance with the permit.

Appendix C **Regional Sensitive Species** (cont.)					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS***	**GENERAL HABITAT DESCRIPTION**	**HABITAT PRESENT/ ABSENT†**	**RATIONALE**
WILDLIFE (cont.)					
Vertebrates (cont.)					
Birds					
Polioptila californica californica	Coastal California gnatcatcher	FT/SSC MSCP Covered, protected within MHPA	**Distribution**: Obligate, permanent resident of coastal sage scrub below 2500 ft. in Southern California. **Habitat**: Coastal sage scrub of varying subtypes, sometimes riparian (foraging and dispersal only), other habitats as well	SP	No suitable habitat occurs on-site. Parcel completely developed. Two pair observed in BSA. No MHPA.
Campylorhynchus brunneicapillus sandiegensis	Coastal cactus wren	BCC/SSC MSCP Covered	**Distribution:** Southern California coastal sage scrub. **Habitat:** Coastal cactus wrens require tall cactus for nesting and roosting.	A	No suitable habitat on-site or within the BSA.
Rallus obsoletus levipes	Light-footed Ridgway's rail	FE/FP MSCP Covered	**Distribution:** Found in salt marshes traversed by tidal soughs, where cordgrass and pickleweed are the dominant vegetation. **Habitat:** Requires dense growth of either pickleweed or cordgrass for nesting or escape cover; feeds on mollusks and crustaceans.	A	No suitable habitat occurs on-site or within the BSA.
Sternula antillarum browni	California least tern	FE/FP MSCP Covered	**Distribution:** Nests along the coast from San Francisco Bay south to Northern Baja California. **Habitat:** Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, land fills, or paved areas.	A	No suitable habitat occurs on-site or within the BSA.
Vireo bellii pusillus	Least Bell's vireo	FE/SE MSCP Covered	**Distribution:** Summer residence of Southern California in low riparian or in vicinity of water or dry river bottoms; below 2000 feet. **Habitat:** Nest placed low along margins of bushes, usually willow, baccharis, etc.	A	No suitable habitat occurs within the BSA.

Appendix C **Regional Sensitive Species** (cont.)					
SCIENTIFIC NAME	**COMMON NAME**	**STATUS***	**GENERAL HABITAT DESCRIPTION**	**HABITAT PRESENT/ ABSENT†**	**RATIONALE**
WILDLIFE (cont.)					
Birds					
Sialia mexicana	Western bluebird	--/-- MSCP Covered	**Distribution**: Areas with nesting cavities. **Habitat**: Parks, golf courses with mature trees and wide lawns, montane coniferous and oak woodlands.	SP	Parcel completely developed. A pair observed flying over BSA.
Mammals					
Neotoma lepida intermedia	San Diego desert woodrat	--/SSC	**Distribution**: Coastal slope of southern California from San Luis Obispo County south into coastal northwestern Baja **Habitat**: Open chaparral and coastal sage scrub, often with large stick nests (midden) in rock outcrops or around clumps of cactus or yucca	SP	No suitable habitat occurs on-site. Parcel completely developed. However, midden observed in adjacent BSA.
Eumops perotis coalifornicus	Western mastiff bat	--/SSC	**Distribution**: Many open, semi-arid habitats, including coastal scrub, chaparral. **Habitat**: Roosts in crevices in cliff faces, high buildings, trees, tunnels.	A	No suitable habitat occurs on-site or in the BSA.
Perognathus longimembris pacificus	Pacific pocket mouse	FE/SSC MSCP Covered	**Distribution:** Endemic to coastal Southern California. Three to four known populations from Marina del Rey and El Segundo to south San Diego County, no more than 2.5 miles from the ocean. **Habitat:** Sandy soil of coastal strand, coastal dunes and coastal sage scrub growing on marine terraces.	A	No suitable habitat present on-site or BSA.

*FE = Federally listed endangered. FT = Federally listed threatened. SE = State listed endangered. ST = State listed threatened. SSC = State species of special concern. WL = Watch list. FP = Fully Protected = State fully protected.

CRPR List 1B = Rare, threatened, or endangered in California and elsewhere, eligible for state listing. List 2 = Rare, threatened, or endangered in California but more common elsewhere, eligible for state listing. List 3 = Distribution, endangerment, ecology, and/or taxonomic information needed, some eligible for state listing. List 4 = A watch list for species of limited distribution, needs monitoring for changes in population status, few (if any) eligible for state listing.

MSCP Covered = Species for which the City has "take" authorization within the MSCP area. MSCP NE = Narrow endemic species are native species that have "restricted geographic distributions, soil affinities, and/or habitats." The MSCP participants' subarea plans have specific conservation measures to ensure impacts to narrow endemics are avoided to the maximum extent practicable.

†ABSENT (A) = suitable habitat absent. HABITAT PRESENT (HP) = suitable habitat is present. SPECIES PRESENT (SP) = species present based on survey results.

SOURCE: CDFW 2022. *The list of species included in this table is based on database queries for areas within approximately 5 miles of the BSA, including selected*

Appendix C Regional Habitats of Concern			
NATURAL COMMUNITY	**GLOBAL RANKING**	**STATE RANKING**	**HABITAT PRESENT OR ABSENT**
San Diego Mesa Hardpan Vernal Pool	G2	S2.1	Absent
Southern Coastal Salt Marsh	G2	S2.1	Absent
Southern Cottonwood Willow Riparian Forest	G3	S3.2	Absent
Southern Maritime Chaparral	G1	S1.1	Present
Southern Riparian Forest	G4	S4	Absent
Southern Riparian Scrub	G3	S3.2	Absent

SOURCE: *CDFW 2022. The list of natural communities included in this table is based on database queries for areas within approximately 5 miles of the BSA, including selected results from the La Jolla, California USGS 7.5 Minute Quadrangles.*

Global Ranking
G1 = Less than 2,000 acres exist worldwide.
G2 = Approximately 2,000 to 10,000 acres exist worldwide.
G3 = Approximately 10,000 to 50,000 acres exist worldwide.
G4 = Community is secure worldwide, but factors exist to cause some concern.

State Ranking
S1.1 = Considered very threatened in California; less than 2,000 acres exist statewide.
S2.1 = Considered very threatened in California; approximately 2,000 to 10,000 acres exist statewide.
S3.2 = Considered very threatened in California; approximately 10,000 to 50,000 acres statewide.
S4 = Community is secure statewide, but factors exist to cause some concern.

*Refer to Appendix D for an explanation of listing and sensitivity codes.

APPENDIX E
STATUS CODES FOR PLANT AND WILDLIFE SPECIES

Attachment E
EXPLANATION OF STATUS CODES FOR PLANT AND WILDLIFE SPECIES

FEDERAL, STATE, AND LOCAL CODES

U.S. Fish and Wildlife Service (USFWS)

FE	Federally listed endangered
FT	Federally listed threatened

California Department of Fish and Wildlife (CDFW)

SE	State listed endangered
SR	State listed rare
ST	State listed threatened
SSC	State species of special concern
WL	Watch List
Fully Protected	Fully Protected species refers to all vertebrate and invertebrate taxa of concern to the Natural Diversity Data Base regardless of legal or protection status. These species may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW.

OTHER CODES AND ABBREVIATIONS

Multiple Species Conservation Program (MSCP) Covered

Multiple Species Conservation Program covered species for which the City has taken authorization within the MSCP area.

City Narrow Endemic (NE) Species

Some native species (primarily plants with restricted geographic distributions, soil affinities, and/or habitats) are referred to as a narrow endemic species. For vernal pools and identified narrow endemic species, the jurisdictions will specify measures in their respective subarea plans to ensure that impacts to these resources are avoided to the maximum extent practicable.

Attachment E
EXPLANATION OF STATUS CODES FOR PLANT AND WILDLIFE SPECIES

OTHER CODES AND ABBREVIATIONS

California Native Plant Society (CNPS) Codes

Lists

1A = Presumed extinct.

1B = Rare, threatened, or endangered in California and elsewhere. Eligible for state listing.

2 = Rare, threatened, or endangered in California but more common elsewhere. Eligible for state listing.

3 = Distribution, endangerment, ecology, and/or taxonomic information needed. Some eligible for state listing.

4 = A watch list for species of limited distribution. Needs monitoring for changes in population status. Few (if any) eligible for state listing.

List/Threat Code Extensions

.1 = Seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

.2 = Fairly endangered in California (20 to 80 percent occurrences threatened)

.3 = Not very endangered in California (less than 20 percent of occurrences threatened, or no current threats known)

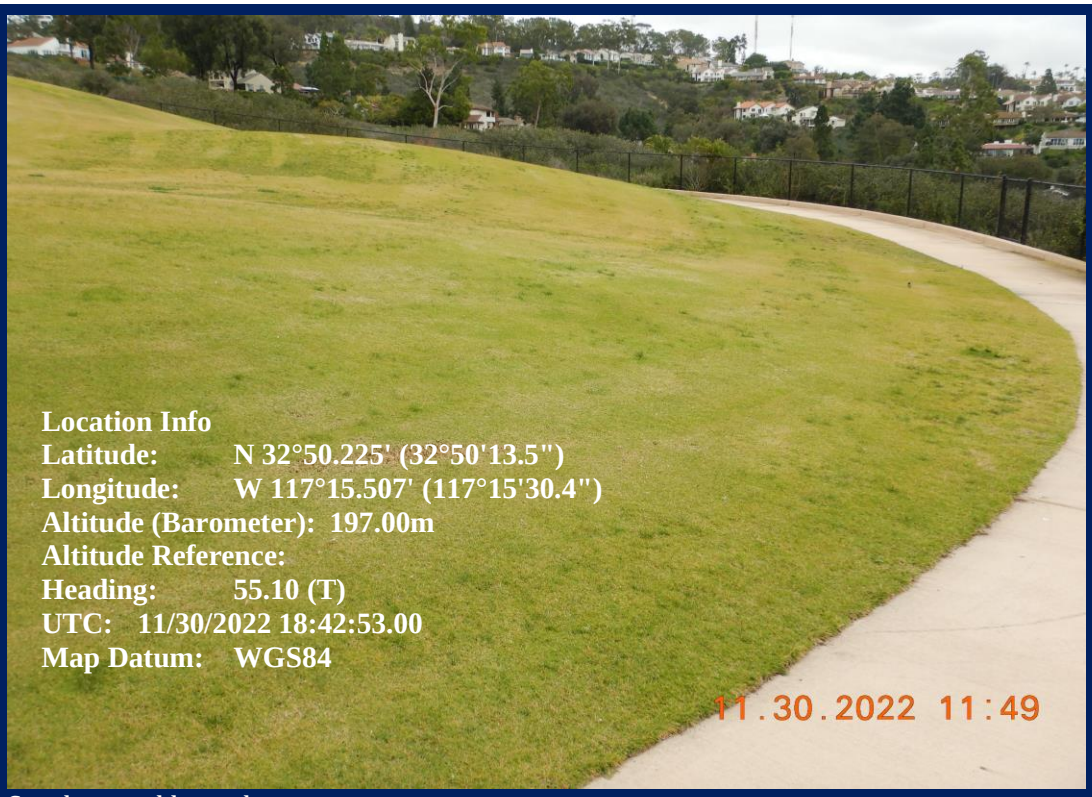
A "CA Endemic" entry corresponds to those taxa that only occur in California.

All List 1A (presumed extinct in California) and some List 3 (need more information; a review list) plants lacking threat information receive no extension. Threat Code guidelines represent only a starting point in threat level assessment. Other factors, such as habitat vulnerability and specificity, distribution, and condition of occurrences, are considered in

APPENDIX F
PHOTOGRAPHS

North parcel boundary

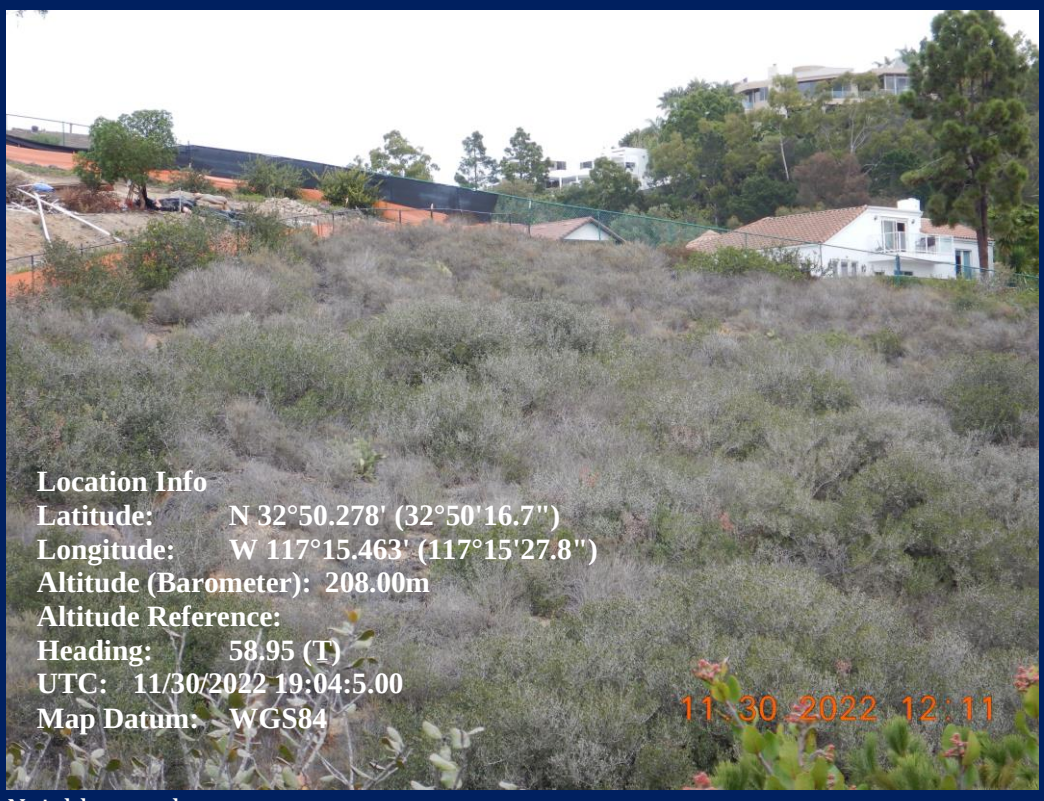
East parcel boundary



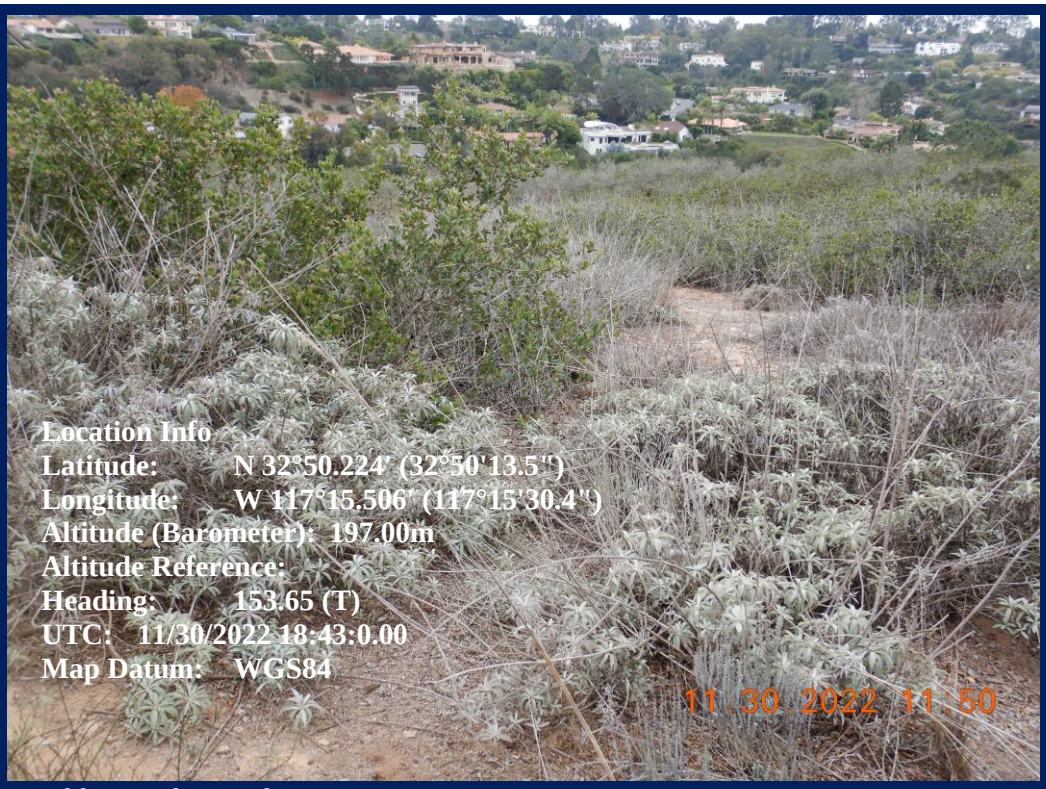
South parcel boundary

West parcel boundary

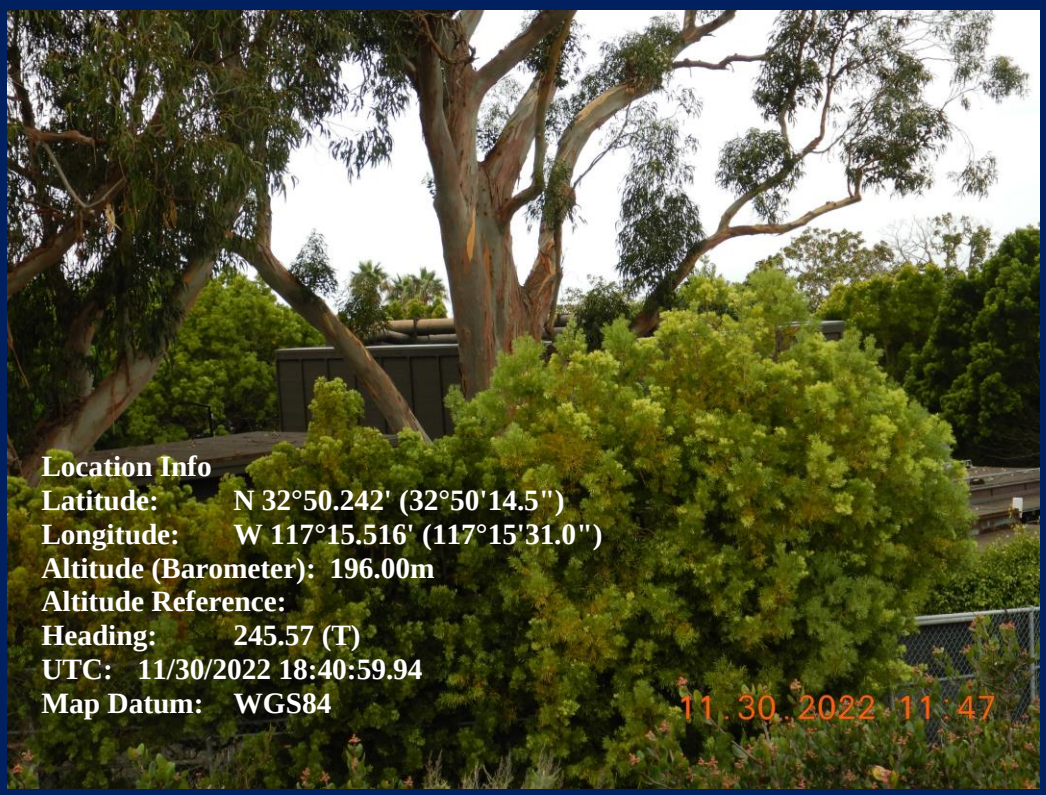
Neighbor to the north



Neighbor to the east



Neighbor to the south



Neighbor to the west