



March 18, 2025

Shelby Jordan Midway Rising, LLC
700 2nd Street
Encinitas, California 92024

Subject: Midway Rising Project Biological Resources Constraints Study

Dear Mr. Shannon,

The purpose of this Biological Resources Constraints Study is to assist in the early planning and identify potential biological constraints for the proposed Midway Rising Project (Project), including off-site improvements. On September 5, 2023, Harris & Associates (Harris) conducted a biological resources field reconnaissance survey on the 49.23-acre Project site and within its 100-foot buffer (68.57 acres in total). On February 27, 2024, a follow-up biological resources field reconnaissance survey was conducted for the Project's proposed off-site improvements, collectively totaling 20.69 acres plus a 100-foot buffer (61.19 acres in total) around the perimeter of each improvement area. The survey area, which includes the Project site, off-site improvements areas, and 100-foot buffers, encompasses the existing San Diego International Sports Arena (currently named Pechanga Arena) and vicinity north of Sports Arena Boulevard. The purpose of the surveys was to identify existing vegetation and other sensitive resources. In addition to the survey results, a review of biological databases is provided in this analysis to aid in the impact evaluation of the Project on its current immediate and surrounding environment.

Project Location and Description

Project Location

The 49.23-acre Project site is located within the Midway District in the City of San Diego (City), in San Diego County (County), California. It is approximately 0.40 mile southwest of where Interstate (I-) 8 and I-5 intersect, approximately 0.40 mile south of Mission Bay, and directly east of Sports Arena Community Village (Attachment 1, Figures; Figure 1, Regional Location, and Figure 2, Project Location). The Project site is within the City's Multiple Species Conservation Program (MSCP) but not the MSCP's Multi-Habitat Planning Area (MHPA). The San Diego River and Mission Valley Preserve, which are within the MHPA, are approximately 0.04 mile and 0.40 mile north of the Project site, respectively. The Project includes the central and eastern portions of City-owned Assessor's Parcel Number (APN) 441-590-04 to be included in the Midway Rising Specific Plan. Street addresses on the Project site include 3220, 3240, 3250, 3350, and 3500 Sports Arena Boulevard. The proposed off-site improvements are within the Midway District in the City in San Diego County, California. The off-site improvements include various roadway, pedestrian, bicycle, and transit improvements along Sports Arena Boulevard, Kurtz Street, and Rosecrans Street and intersections throughout the Midway District (Figure 2).

Project Description

The Project would redevelop the existing San Diego International Sports Arena owned by the City. The Project site is currently developed with San Diego International Sports Arena, asphalt surface parking lots, a gasoline service station, restaurants, lumber and home store, a thrift store, and various commercial/retail businesses. Buildout of the Project would redevelop the site to allow for up to 4,254 housing units, including affordable units, parks and public space, a multi-purpose entertainment center, and commercial uses.

The Project would also include various infrastructure improvements on and off site, including extensions and/or upgrades of existing water, sewer, stormwater, roadways, bicycle, transit, mobility, and pedestrian

facilities. Traffic improvements would include adding or extending turn lanes, separating shared through/turn lanes, signaling interactions, and optimizing signal timing within the public rights-of-way. Off-site improvements would occur along Sports Arena Boulevard, Kurtz Street, and Rosecrans Street and several intersections throughout the Midway District (Figure 3, Site Map).

Environmental Setting

Land Use

The survey area consists of developed urbanized land in the City. The Project site is currently developed with the San Diego International Sports Arena, asphalt parking lots, a gasoline service station, restaurants, and various commercial/retail businesses. The San Diego International Sports Arena and associated parking lots occur in the central and western portions of the survey area, and commercial buildings and the SOMA San Diego music venue are in the eastern portion of the survey area. Restaurants and other commercial buildings occur in the southern portion of the survey area. The areas surrounding the Project site consist of commercial buildings, parking lots, and retail shopping centers. An abandoned sewer line is also surrounded by commercial developments on all sides. The off-site improvements would be in developed areas along existing roadways and intersections surrounded by commercial development.

Topography and Soils

The survey area is composed primarily of flat land. The elevation ranges from approximately 10 feet to 15 feet above mean sea level. The topographic lines presented on Figure 4, USGS Topographic Map, represent the survey area elevation. The survey area is depicted on the U.S. Geological Survey (USGS) 7.60-minute La Jolla quadrangle (Figure 4). A search of the U.S. Department of Agriculture Natural Resources Conservation Service soil series website returned one result: urban soil (USDA 2019) (Figure 5, Soils). A description of this soil series is provided below:

- **Urban Soil** – Urban soil refers to soils that have been significantly changed by human-transported materials, are human-altered materials, or are minimally altered or intact native soils but are in areas of high population density. Urban soils exhibit a wide range of conditions and properties that may include impervious surfaces such as pavement or buildings (USDA 2019).

Hydrology

The survey area is in the San Diego River Watershed, and is adjacent to the Peñasquitos Watershed and San Diego Bay Watershed, specifically within the Lower San Diego Hydrologic Area (Hydrologic Unit 907.1) and the Pueblo San Diego Hydrologic Area (Hydrologic Unit 908) (Project Clean Water 2025). The Los Peñasquitos Watershed and Tijuana Watershed border the survey area immediately to the north and south, respectively.

The San Diego River Watershed is the second largest in San Diego County, encompassing approximately 434 square miles. The major tributaries to the San Diego River include Boulder Creek, which empties into the San Diego River in the headwaters above El Capitan Reservoir, and San Vicente Creek, which empties into the San Diego River in Lakeside. There are numerous smaller tributaries as well, including Cedar Creek in the headwaters of the San Diego River, Forester Creek and Sycamore Creek in Santee, Oak Creek in Mission Trails Regional Park, as well as Alvarado Creek, Murphy Creek, and Murray Creek in Mission Valley (Project Clean Water 2025).

The Pueblo San Diego Watershed encompasses approximately 59 square miles in the County and is the smallest of the three hydrologic areas within the San Diego Bay Watershed. The watershed consists of mostly developed areas and is the most densely populated watershed in the San Diego Bay Watershed. The watershed falls within the jurisdictions of the Port of San Diego, the County of San Diego, and the Cities of San Diego, La Mesa, Lemon Grove, and National City, and can be further broken down into three sub-watersheds, or hydrologic areas that include Point Loma (908.1), San Diego Mesa (908.2), and National City (908.3). The southern portions of the survey area are in the Point Loma Hydrologic Area (Hydrologic Unit

Code 908.1). Major water features include Chollas Creek, Paleta Creek, and San Diego Bay. The majority of the water from the Pueblo San Diego Watershed drains to San Diego Bay, although a portion of the Point Loma Hydrologic Area drains directly to the Pacific Ocean.

The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory and the U.S. Geological Survey National Hydrography Dataset mapping results do not indicate any jurisdictional aquatic resources occur within the survey area (USFWS 2025a; USGS 2025). National Wetlands Inventory and National Hydrology Database results identified several aquatic features surrounding the survey area, but not within them, as shown on Figure 6, Hydrology (USFWS 2025a; USGS 2025). The San Diego River, a riverine channel and tributary to the San Diego River Watershed, occurs north of the survey area. The river flows from northeast of the survey area, where it is surrounded by freshwater/forested shrub habitat and freshwater emergent wetland, and continues west, where it eventually discharges into the Pacific Ocean near the entrance to Mission Bay, forming an estuary. This area along with portions of Mission Bay are surrounded by estuarine and marine wetland habitat. A portion of San Diego Bay identified as estuarine and marine deepwater occurs southeast of the southernmost off-site improvements areas. The San Diego River, Mission Bay, and San Diego Bay are considered traditional navigable waters by the U.S. Army Corps of Engineers (USACE) (USACE 2025).

Further discussion on potentially jurisdictional aquatic resources is provided in the Jurisdictional Aquatic Resources section.

Climate

The survey area is in the County. On a regional level, the County has a Mediterranean climate, which is characterized by wet winters and dry summers. This is largely because of a Semi-Permanent High-Pressure Zone that sits over the Pacific Ocean during much of the year and forms a fog belt (marine layer). The Project site is generally within the Peninsular Ranges of Southern California. The generalized climate in the region is dry, subhumid mesothermal, which pushes the growing season to the wet months of the year (late winter to early spring). The rainy season in the County typically lasts from October through March. Vegetation often goes dormant during the later summer months until the first rain in the fall.

According to historical data from the San Diego International Airport weather station, located approximately 1.50 miles south of the survey area, the average maximum annual temperature for the surrounding area is 70.90 degrees Fahrenheit (°F), and the average minimum temperature is 58.5°F. Average annual precipitation in the area is 9.44 inches. The average annual precipitation between 2004 and 2024 was approximately 8.75 inches. In February 2024, when the final biological survey was conducted, the total rainfall was 4.58 inches, approximately 2.80 inches greater than February 2023 (NRCS 2025). As of February 2024, the total annual precipitation in the area was 8.23 inches, approximately 1.31 inches greater than the totals from January and February 2023 (NRCS 2025).

Regulatory Setting

This section provides guidance on the potential regulatory requirements and/or limitations subject to projects that may impact sensitive environmental resources.

Federal

Clean Water Act Section 404 (Code of Federal Regulations, Title 33, Section 328.3[a])

These provisions regulate the discharge of dredged or fill material in waters of the United States, including wetlands. Activities that discharge dredge or fill material into waters of the United States can be authorized by the USACE.

Endangered Species Act (U.S. Code, Title 16, Sections 1531 through 1543)

The federal Endangered Species Act and subsequent amendments prohibit the “take” (i.e., harm, harass, or kill individuals or destroy associated habitat) of species federally listed as threatened or endangered. Take, incidental to otherwise lawful activities, can be authorized by the USFWS through a permit under Sections 4(d), 7, or 10(a).

Migratory Bird Treaty Act (U.S. Code, Title 16, Sections 703 through 711)

The Migratory Bird Treaty Act (MBTA) is the domestic law that affirms or implements a commitment by the United States to four international conventions (Canada, Mexico, Japan, and Russia) for the protection of a shared migratory bird resource. The MBTA makes it unlawful at any time, by any means, or in any manner to pursue, hunt, take, capture, or kill migratory birds. The law also applies to the removal of nests occupied by migratory birds during the breeding season. The MBTA makes it unlawful to take, pursue, molest, or disturb these species, their nests, or their eggs anywhere in the United States.

State

Birds of Prey Protection Provision (California Fish and Game Code Section 3503.5)

This provision prohibits the taking of birds of prey (orders Falconiformes and Strigiformes), including their nests and eggs.

California Endangered Species Act (California Fish and Game Code Section 2050 et seq.)

The California Endangered Species Act prohibits any activities that would jeopardize or take a species designated as threatened or endangered by the state.

California Environmental Quality Act, as Amended (California Public Resources Code Section 21000 et seq.)

The goal of the California Environmental Quality Act (CEQA) is to assist California public agencies in identifying potentially significant negative environmental impacts caused by their actions and avoiding or mitigating those impacts when feasible.

California Fish and Game Code Section 1600 (Streambed Alteration Agreement)

The California Fish and Game Code (CFG) requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or their tributaries, or use materials from a streambed to submit a notification for a Streambed Alteration Agreement to the California Department of Fish and Wildlife (CDFW).

California Fish and Game Code Section 1602

Section 1602 regulates water resources in the State of California. Activities that divert or obstruct the natural flow of or change or use material from the bed, channel, or bank of any river, stream, or lake may be authorized by the CDFW. CDFW jurisdiction includes intermittent and perennial watercourses and extends to the top of the bank of a stream or lake if unvegetated or to the limit of the adjacent riparian vegetation, located contiguous to the watercourse, if the stream or lake is vegetated.

California Fish and Game Code Section 3503

CFG Section 3503 prohibits the take, possession, or needless destruction of the nests or eggs of any birds except as otherwise provided by the CFG or any regulation made pursuant thereto.

California Fully Protected Wildlife Species Provision (California Fish and Game Code Sections 3511, 4700, 5050, and 5515)

These provisions prohibit the take of fully protected birds, mammals, amphibians, and fish.



California Native Plant Protection Act of 1977 (California Fish and Game Code Sections 1900–1913)

These provisions preserve, protect, and enhance endangered or rare native plants of the state.

Clean Water Act Section 401 (Code of Federal Regulations, Title 40, Section 121)

The Regional Water Quality Control Board (RWQCB) regulates impacts to water quality under Section 401 of the Clean Water Act (CWA). A project must comply with Section 401 of the CWA before the USACE can issue a Section 404 Permit. The RWQCB will issue a Section 401 Water Quality Certification or Waiver of Certification depending on the extent of impacts to waters of the United States. The RWQCB also regulates impact to waters of the state (usually limited to “isolated” waters or swales that may not fall under USACE jurisdiction) under the Porter-Cologne Water Quality Control Act (Porter-Cologne).

Natural Community Conservation Planning Act, as Amended (California Fish and Game Code Sections 2800–2835)

The primary objective of the Natural Community Conservation Planning program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by the listing of species by focusing on the long-term suitability of wildlife and plant communities and including key interests in the process.

Porter-Cologne Water Quality Control Act

This act is regulated by the RWQCB for impacts to waters of the state. Although water quality issues related to impacts to waterways are normally addressed in a Section 401 Water Quality Certification, should a water of the State of California be determined by the USACE not to have CWA jurisdiction, Porter-Cologne would be addressed under a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending on the level of impact and the properties of the waterway.

Local

San Diego County Multiple Species Conservation Program

The City is a participant in the regional County of San Diego’s MSCP, a cooperative federal, state, and local environmental conservation program aimed at preserving San Diego’s unique native plants and wildlife (covered species) (County of San Diego 1998). The program’s boundaries extend over multiple jurisdictions and environments including regional watersheds and migratory wildlife corridors. The program also protects the region’s diverse native plant and wildlife species, including those that are threatened and endangered. The MSCP also provides provisions and regulations that accommodate future growth and streamline building regulations while protecting natural resources in the region.

1997 City of San Diego Multiple Species Conservation Program Subarea Plan

The MSCP Subarea Plan (SAP) was adopted in 1997 and encompasses 206,124 acres in the regional MSCP Study Area (City of San Diego 1997). The SAP delineates an MHPA where preserve planning is focused, and permanent conservation of habitat lands will be accomplished and includes a process for the issuance of permits under the California Natural Communities Conservation Planning Act of 1991, federal Endangered Species Act, and California Endangered Species Act. The MSCP SAP is characterized by predominantly urban land uses, including associated parks and open space. The MSCP SAP separates the City into several geographic subunits. The Project is in the urban area, which encompasses the central coastal and central eastern portions of San Diego, including Urban Habitat Areas. The Urban Habitat Areas include existing designated open space such as Mission Bay; Tecolote Canyon; Marian Bear Memorial Park; Rose Canyon; San Diego River; the southern slopes along Mission Valley, Carroll Canyon, and Rattlesnake Canyon; Florida Canyon; Chollas Creek; and a variety of smaller canyon systems. The majority of these lands consist of canyons with native habitats in relative proximity to other MHPA areas providing habitat. These areas contribute in some form to the MHPA, either by providing habitat for native

species to continue to reproduce and find new territories or by providing necessary shelter and forage for migrating species. The Project site is not within or directly adjacent to the MHPA; however, the San Diego River and Mission Valley Preserve, which are within the MHPA, are approximately 0.04 mile north of the Project site. The closest MHPA-designated segment of Mission Bay is approximately 0.86 mile north of the Project site. The Project is required to comply with the General Management Directives outlined in Section 1.5.2 of the MSCP SAP.

2008 City of San Diego General Plan

The Project is in the City and, therefore, is subject to the goals and policies in the 2008 City of San Diego General Plan, as amended (2008 General Plan) (City of San Diego 2008). The 2008 General Plan provides policy guidance to balance the needs of a growing city while enhancing the quality of life for current and future San Diegans. It includes the City of Villages strategy, which outlines how the City can enhance its many communities and neighborhoods as growth occurs over time. The 2008 General Plan contains 10 elements that provide a comprehensive “blueprint” for the City’s growth over the next 20 plus years.

The Midway-Pacific Community Plan was adopted in 2018 to provide a framework for how the City will grow and develop while addressing community needs for the urbanized community situated north of downtown between Old Town and Point Loma in the City (City of San Diego 2018a). The plan area encompasses approximately 800 acres of mostly flat and developed land with a commercial core containing shopping centers, institutional facilities, multi-family residences, visitor-oriented uses, older industrial areas, and U.S. military properties. The goals of the plan are to:

- Establish a vision with policies to guide the future growth and development within Midway-Pacific Highway, consistent with the General Plan;
- Provide strategies and implement actions to accomplish the vision;
- Provide guidance to design and evaluate development proposals and improvement projects; and
- Provide the basis for plan implementation including zoning, development regulations, and a public facilities financing plan.

The Project is required to comply with the Policies CE-3.1 through CE-4.4, which provide a framework for environmental conservation and best practices for the coastal areas, including the San Diego River within the Midway-Pacific Highway Community Planning Area.

City of San Diego Municipal Code

Environmentally Sensitive Lands Regulations

The purpose of Environmentally Sensitive Lands regulations is to protect, preserve, and where damaged, restore the Environmentally Sensitive Lands (e.g., wetlands, sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas) of San Diego and the viability of the species supported by those lands. These regulations are intended to ensure that development, including but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities (City of San Diego 2022).

City of San Diego Biology Guidelines

The City developed the Biology Guidelines in the San Diego Municipal Code (SDMC) to aid in the implementation and interpretation of the Environmentally Sensitive Lands Regulations, SDMC Chapter 14, Article 3, Division 1, Section 143.0101 et seq., and the Open Space Residential (OR-1-2) Zone, Chapter 13, Article 3, Division 2, Section 131.0201 et seq. The guidelines also provide standards for the determination of impact and mitigation under CEQA. Sensitive biological resources, as defined by the Environmentally

Sensitive Lands Regulations, include lands within the MHPA and other lands outside the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species (City of San Diego 2018c).

Methods

This Biological Resources Constraints Study includes the results of a database review and biological resources field reconnaissance surveys that serve to document the existing biological conditions of the survey area. The results of the database review provide information on potential constraints to Project construction due to the presence (or lack thereof) of sensitive biological resources.

Database Review

Review of online databases, including the CDFW California Natural Diversity Database (CDFW 2025a), CDFW Biogeographic Information and Observation System (CDFW 2025b), USFWS National Wetlands Inventory Wetlands Mapper (USFWS 2025a), USFWS Information for Planning and Consultation (USFWS 2025b), Consortium of California Herbaria database (CCH 2025), Calflora database (Calflora 2025), and California Native Plant Society Rare Plant Inventory (CNPS 2025) was conducted for the Project and within a 1-mile radius of the survey area.

Field Reconnaissance Surveys

General Biological Survey

A biological resources surveys were conducted by Harris biologists on September 5, 2023, and February 27, 2024. A 100-foot buffer around the Project site boundary and off-site improvements areas was used for the biological surveys. The surveys were conducted by walking meandering transects throughout the survey area and mapping vegetation communities, documenting plant and wildlife species, noting suitable habitat, and evaluating the potential for occurrence of sensitive, rare, threatened, and endangered plant and wildlife species, as well as suitable roosting habitat for bats (Attachment 2, Plant Species Observations, and Attachment 3, Wildlife Species Observations). Vegetation mapping was recorded in the field using the ArcGIS Collector application with an aerial image of the survey area. Binoculars were used to visually identify wildlife species; biologists also listened for vocalizations. The potential for sensitive plant and wildlife species to occur in the survey area is presented in Table 1, Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area, in the Results section. The results of this analysis provide information on the potential constraints to Project development due to the presence of special-status biological resources.

Focused Bat Roost Assessments

The Project site, with focus on the San Diego International Sports Arena, was initially assessed during daytime for bat roosts and potential for roosting bats by bat specialist Drew Stokes from the San Diego Natural History Museum (SDNHM) on September 5, 2023. The San Diego International Sports Arena structure was too tall to be thoroughly assessed for sign (e.g., guano, staining, insect parts) of bats during the day; therefore, a night exit survey was conducted. An evening exit count bat survey was conducted at the San Diego International Sports Arena on October 23, 2023, led by Drew Stokes, who was supported by SDNHM and Harris biologists. The survey was conducted to observe if any roosting bats would be exiting the structure. The five biologists conducting the survey were staged around the entire perimeter of the San Diego International Sports Arena at approximately 5 to 20 meters apart to be able to adequately observe any potential exiting bats. Results of the bat roost assessments are provided in the section of Roosting Bats under Results/Sensitive Plant and Wildlife Species, below.

No focused bat roosting surveys were conducted in the off-site improvements areas because it was determined that no suitable roosting habitat is present at those locations.

Survey Limitations

Plants and wildlife were identified by direct observation, vocalizations, or other observance, including tracks, scat, and other sign. Therefore, lists of observed species are not necessarily comprehensive, as species can be nocturnal, secretive, or within the region and survey area seasonally (migration) and, therefore, may not have been observed.

Results

Vegetation Communities and Land Cover Types

One land cover type, urban/developed land, was documented in the survey area (Oberbauer et al. 2008). Nearly all plant species identified within the survey area are ornamental plants for aesthetic (landscaping) purposes or non-native invasive weed species that typically occupy severely disturbed areas. No native vegetation communities or habitat types are located within the survey area.

Disturbed Habitat/Developed Lands

Urban/Developed Land (12000)

Urban/Developed land represents areas that have been constructed on or otherwise physically altered to an extent that native vegetation communities are not supported (Oberbauer et al. 2008). This land cover type generally consists of semi-permanent structures, homes, parking lots, pavement or hardscape, and landscaped areas that require maintenance and irrigation (e.g., ornamental greenbelts). Typically, this land cover type is unvegetated or supports a variety of ornamental plants and landscaping.

The Project site, including the 100-foot buffer, totaling 68.57 acres, is composed of urban/developed land, with 49.23 acres occurring on the Project site boundary and the remaining 19.34 acres within the survey buffer only. The off-site improvements areas, totaling 20.69 acres, is composed of urban/developed land. The survey buffer around the off-site improvements areas, totaling 40.50 acres, is entirely urban/developed land as well. These survey area acres include paved parking lots and roads, commercial buildings, restaurants, gas stations, a music venue, a lumber yard, the San Diego International Sports Arena, shopping centers, and landscaped areas (Figure 7, Land Cover Types).

Jurisdictional Aquatic Resources

No formal jurisdictional aquatic resources delineation was conducted during the September 2023 and February 2024 surveys. The survey area was assessed for potentially jurisdictional aquatic resources during the reconnaissance surveys and desktop database review, and no aboveground (surface) potentially jurisdictional aquatic resources were observed or previously documented in the survey area. The San Diego River and Mission Bay occur approximately 0.04 mile north of the survey area and approximately 0.4 mile north of the survey area, respectively, and are both under the jurisdiction of the USACE, RWQCB, and CDFW pursuant to Sections 404 and 401 of the CWA. However, the San Diego River and Mission Bay are separated from the survey area by Hancock Street and I-8 or the I-8 off-ramp, and no aquatic resources with direct surface connections to these features were observed on the Project site or in the off-site improvements areas.

The limits of development for the Project site and off-site improvements areas would be restricted to entirely developed areas that do not contain potentially jurisdictional aquatic resources but do include the re-alignment of an existing storm drain, construction of a new storm drain and several underground connections to existing and new storm drains, and replacement of inlets along Sports Arena Boulevard, all of which may convey urban stormwater underground through developed land into the San Diego River and Mission Bay through the municipal stormwater system.

Plant Species

Attachment 2 lists the vascular plant species observed in the survey area during the September 2023 and February 2024 biological resources reconnaissance surveys. A total of 33 plant species and taxa were identified in the survey area, and 29 plant species and taxa (88 percent of total) were non-native species. No sensitive plant species were identified in the survey area during the 2023 and 2024 biological reconnaissance surveys; therefore, a focused rare plant survey was not conducted. Sensitive plant species are not expected to occur in the survey area due to the current highly developed conditions, abundance of impervious surfaces, and lack of native vegetation communities to provide habitat.

Sensitive plant species with potential to occur in the survey area are discussed in the Sensitive Plant and Wildlife Species section.

Wildlife Species

Attachment 3, Wildlife Species Observations, lists the wildlife species observed in the survey area during the September 2023 and February 2024 biological resources reconnaissance surveys. A total of eight wildlife species were observed in the survey area. The only non-native wildlife species observed was rock pigeon (*Columba livia*). In total, two mammals, one reptile, and five birds were observed in the survey area. Common bird species observed in the survey area include western gull (*Larus occidentalis*), American crow (*Corvus brachyrhynchos*), and rock pigeon. No sensitive wildlife species were observed in the survey area during the 2023 and 2024 biological surveys.

The survey area contains no native (or non-native) vegetation communities that would provide habitat and necessary resources to support an abundance of wildlife. The survey area is made up of almost all impermeable surfaces, including pavement, concrete sidewalks, or buildings and other structures. Some landscaping is present; however, the plant species are ornamental and do not promote biodiversity or provide enough support for wildlife species beyond potentially suitable nesting locations for birds, or temporary refugia and limited, temporary foraging opportunities. Litter and debris from human activity in the area likely attract many species adapted to human presence like gull species (i.e., *Larus* spp.), American crow, common raven (*Corvus corax*), raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*). Mission Valley Preserve and the San Diego River are approximately 0.40 mile and 0.04 mile north, respectively, of the survey area. They are physically separated from the Project site by I-8. Species using these habitats could move outside these areas and into the survey area or establish territories within proximity to the survey area, but overall, this is unlikely because the survey area generally lacks resources and habitat to support most species except for nesting opportunities and refugia for birds, bats, reptiles, and small mammals.

The sensitive wildlife species with potential to occur in the survey area are discussed in the Sensitive Plant and Wildlife Species section.

Sensitive Plant and Wildlife Species

Sensitive species are those recognized by federal, state, or local agencies as being potentially vulnerable to impacts because of rarity, local or regional reductions in population numbers, isolation/restricted genetic flow, or other factors. Sensitive plants include those listed as threatened or endangered, proposed for listing, or candidates for listing under the federal Endangered Species Act by the USFWS (USFWS 2025c) and the California Endangered Species Act by the CDFW (CDFW 2025c); those considered species of special concern by the CDFW (CDFW 2025d); those species included in the California Rare Plant Rank inventory maintained by the California Native Plant Society; those listed as a MSCP SAP covered species; and/or defined by the City as narrow endemic. Sensitive wildlife species include those listed as threatened or endangered, proposed for listing, or candidates for listing under the federal Endangered Species Act by the USFWS (USFWS 2025c) and the California Endangered Species Act by the CDFW (CDFW 2025c); those considered as species of special concern by the CDFW (CDFW 2025d); or MSCP SAP covered species.

No sensitive plant species were observed during the September 2023 and February 2024 surveys; therefore, no focused sensitive plant survey was conducted. A daytime bat roost assessment of the survey area was conducted in September 2023, and a nighttime bat roost survey was conducted in October 2023. No roosting bat surveys were conducted for the off-site improvements due to absence of suitable roosting habitat. No other focused sensitive wildlife surveys occurred. No sensitive wildlife species were observed during the 2023 and 2024 surveys.

As described in the Database Review section, distributions of historical sensitive species observations within 1 mile of the survey area were reviewed in preparation of this report. For the purposes of this biological resources assessment, those species that are known to occur or have some potential to occur within 1 mile of the survey area are addressed in this section. The list of potentially occurring sensitive plant and wildlife species is provided in Table 1, Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area, and shown on Figure 8, Sensitive Species with Potential to Occur, along with listing status, habitat requirements, and an assessment of their potential for occurrence in the survey area.

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
Plants				
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	FT/SE/1B.1/ MSCP	Occurs in vernal pools, coastal sage scrub, chaparral, valley grassland, and riparian habitats between 12 and 3,260 feet amsl. Blooms April through July.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Acmispon prostratus</i>	Nuttal's acmispon	None/None/ 1B.1/None	Occurs in coastal dunes and sandy coastal scrub up to 35 feet amsl. Blooms March–June.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Recent historical locations occur north and east and are separated from the survey area by Hancock Street, I-8, and other developed areas (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Ambrosia pumila</i>	San Diego ambrosia	FE/None/1B.1/ MSCP	Occurs in open, often disturbed, habitats in coarse substrates in grasslands, coastal scrub, river terraces, pools, and alkali playas in Southern California and Baja California. Found below 600 feet amsl. Blooms April–October.	<i>Not expected.</i> Survey area is not within known population locations for this species. Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Ceanothus verrucosus</i>	Wart-stemmed ceanothus	None/None/ 2B.2/MSCP	Occurs in coastal scrub and chaparral from 5 to 1,245 feet amsl. Blooms December–May.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. One historical location from 1896 occurs approximately 0.75 mile southwest but is likely extirpated (Figure 8; USFWS 2025b).
<i>Chorizanthe orcuttiana</i>	Orcutt’s spineflower	FE/SE/1B.1/ MSCP	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub in sandy openings from 10 to 410 feet amsl. Blooms March–May.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Chloropyron maritimum</i> <i>ssp. maritimum</i>	Salt marsh bird’s-beak	FE/SE/1B.2/ MSCP	Occurs in coastal dunes, and coastal salt marshes and swamps up to 100 feet amsl. Blooms May–October (November).	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Corethrogyne filaginifolia</i> var. <i>incana</i>	San Diego sand aster	None/None/ 1B.1/None	Occurs in coastal bluff, chaparral, and coastal scrub habitat from 10 to 375 feet amsl. Blooms June–September.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. One historical location from 1935 occurs approximately 0.90 mile west but is likely extirpated (Figure 8; USFWS 2025b).
<i>Erysimum ammophilum</i>	Sand-loving wallflower	None/None/ 1B.2/MSCP	Occurs in sandy openings of maritime chaparral, coastal dune, and coastal scrub up to 195 feet amsl. Blooms February–June (August).	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. One historical location occurs approximately 0.90 mile west but is listed as likely extirpated (Figure 8; USFWS 2025b).
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button celery	FE/SE/1B.1/ MSCP	Occurs in vernal pools or marshes within wetlands, coastal sage scrub, valley grassland, and wetland-riparian communities that contain clay soils between approximately 37 and 2,907 feet in elevation. Blooms between April and June.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Isocoma menziesii</i> var. <i>decumbens</i>	Decumbent goldenbush	None/None/ 1B.2/None	Occurs in chaparral and (often sandy or disturbed) coastal scrub habitats from 35 to 445 feet amsl. Blooms April–November.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations are from 1934 in a non-specific location to the southwest (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Iva hayesiana</i>	San Diego marsh-elder	None/None/ 2B.2/None	Occurs in wetlands, marshes, floodplains/terraces, swamps, and playas up to 1,640 feet amsl. Sometimes found in non-wetland areas. Blooms April–October.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Recent historical locations occur approximately 0.80 mile west of the survey area (Figure 8; CDFW 2025a).
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None/None/ 1B.1/None	Occurs in wetlands within coastal salt marsh, freshwater wetlands, alkali sink, and wetland-riparian communities up to 4,389 feet amsl. Sometimes found in non-wetlands. Blooms February–July.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations from 1939 occur approximately 0.20 mile northeast and approximately 0.80 mile north of the survey area but are likely extirpated (Figure 8; CDFW 2025a).
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	None/None/4.3/ None	Occurs in chaparral and coastal scrub bluff habitats from 5 to 2,905 feet amsl. Blooms January–July.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations occur approximately 0.90 mile north of the survey area but not within (Figure 8; CDFW 2025a).
<i>Monardella viminea</i>	Willowy monardella	FE/SE/1B.1/ MSCP	Usually occurs along or near ephemeral streams in coarse rocky sand or sandy clay between 122 and 5,118 feet amsl. Blooms June–August.	<i>Not expected.</i> Survey area is not within known population locations for this species. Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Navarretia fossalis</i>	Spreading navarretia	FT/None/1B.1/ MSCP	Occurs in vernal pools and valley and foothill grassland at elevations between 100 and 4,270 feet amsl. Blooms April–June.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Nemacaulis denudata</i> var. <i>denudata</i>	Coast woolly-heads	None/None/ 1B.2/None	Occurs in coastal dune habitats up to 330 feet amsl. Blooms April–September.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. The most recent historical location occurs approximately 0.90 mile north of the survey area but not within. Other historical locations within 1 mile to the northeast and west are from 1920 and 1981 and are likely extirpated (Figure 8; CDFW 2025a).
<i>Orcuttia californica</i>	California Orcutt grass	FE/SE/1B.1/ MSCP	Occurs in vernal pools within freshwater wetlands, valley grassland, and wetland-riparian between communities 49 and 2161 feet amsl. Blooms April–August.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Phacelia stellaris</i>	Brand's star phacelia	None/None/ 1B.1/None	Occurs in coastal dunes and coastal scrub habitats between 0 and 4,182 feet amsl. Blooms May–June.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations occur near the San Diego River approximately 0.50 mile northeast of the survey area but are from 1882 and are likely extirpated (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Pogogyne abramsii</i>	San Diego mesa mint	FE/SE/1B.1/ MSCP	Occurs in vernal pools within freshwater wetlands, coastal sage scrub, chaparral, and wetland-riparian communities between 285 and 833 feet amsl. Blooms May–July.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Quercus dumosa</i>	Nuttall's scrub oak	None/None/ 1B.1/None	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub in sandy, clay, and loam soils from 50 to 1,310 feet amsl. Blooms February–April (May).	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations from 1903 occur approximately 0.50 mile east of the survey area, but are likely extirpated (Figure 8; CDFW 2025a).
<i>Stylocline citroleum</i>	Oil neststraw	None/None/ 1B.1/None	Occurs in clay soils in chenopod and coastal scrub, and valley and foothill grasslands from 165 to 1310 feet amsl. Blooms March–April.	Not expected. Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations from 1883 occur within 1 mile of the survey area but are likely extirpated (CDFW 2025a).
<i>Suaeda esteroa</i>	Estuary seablite	None/None/ 1B.2/None	Occurs in coastal salt marshes and swamps up to 15 feet amsl. Blooms (January–May) July–October.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area. Historical locations occur approximately 0.75 mile west and near the San Diego River and near Mission Bay, northeast of the survey area but not within (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
Wildlife				
Invertebrates				
<i>Bombus crotchii</i>	Crotch's bumble bee	FC/None/—/ None	Occurs in grasslands and shrublands, generally in hotter and drier habitats than other species of bumble bee. This species is short-tongued and therefore prefers plants like milkweeds, buckwheats, medicagos, poppies, and lupines, etc.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat or preferred foraging plant species exist within the survey area. Historical locations from as recent as 2019 occur within the Mission Valley Preserve surrounding the San Diego River to the northeast but not within the survey area (Figure 8; CDFW 2025a).
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	FE/SSC/—/MSCP	Generally restricted to shallow freshwater vernal pools and includes swales, tire ruts, and other depressions that are filled seasonally by rainfall.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Danaus plexippus</i>	Monarch butterfly (California overwintering population)	FC/None/—/ None	Occurs in a variety of habitats where patches of milkweed (<i>Asclepias</i> sp.), the monarch caterpillar host plant, are present. Overwinter in groves of eucalyptus, cypress, and pine along the California coast and high-elevation forests in Mexico.	<i>Moderate foraging, moderate overwintering.</i> Suitable nectar sources for foraging are limited to landscaped/ornamental plants along the edges of the survey area. No milkweed patches occur in the survey area suitable as host plants for caterpillars to occupy. Isolated, small stands of eucalyptus trees suitable for overwintering occur along the edges of the survey area and some off-site improvements areas. Historical locations present approximately 0.75 mile east of survey area but not within (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	FE/None/—/ MSCP	Occurs in deep vernal pools, depressions, and ponds within grassland, chaparral, and coastal scrub.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Panoquina errans</i>	Wandering (=saltmarsh) skipper	None/None/—/ MSCP	Occurs in herbaceous wetlands and sand dunes, most often in salt marshes or near beaches with larval host plant, saltgrass (<i>Distichlis spicata</i>). Known to frequent mouths of rivers. Adults feed on various flower nectar sources.	<i>Not expected.</i> No suitable habitat is available; this species is restricted to salt marsh habitat and estuaries. Historical locations occur approximately 0.75 mile west of the survey area within an estuary (Figure 8; CDFW 2025a).
Amphibians				
<i>Spea hammondi</i>	Western spadefoot toad	FC/SSC/—/None	Occurs primarily in grasslands or open areas in coastal sage scrub with vernal pools or similar shallow, temporary pools for breeding.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable breeding or foraging habitat exists within the survey area. Historical locations occur near the San Diego River, northeast of the survey area. Another location is approximately 0.50 mile east of the survey area; however, this location is likely extirpated (Figure 8; CDFW 2025a; SanGIS 2025).
Reptiles				
<i>Anniella stebbinsi</i>	Southern California legless lizard	None/SSC/—/ None	Occurs in open grassland and scrub habitats.	<i>Not expected.</i> No suitable habitat exists within the survey area. A historical location occurs approximately 0.90 mile east of the survey area but not within (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Arizona elegans occidentalis</i>	California glossy snake	None/SSC/—/ None	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Prefers microhabitats of open areas with friable (burrowing) soils.	<i>Not expected.</i> No suitable habitat exists within the survey area. A historical location occurs approximately 0.80 mile northeast of the survey area but not within (Figure 8; CDFW 2025a).
<i>Phrynosoma coronatum</i>	Blainville's horned lizard	None/SSC/—/ None	Occurs in coastal sage scrub, chaparral, and grasslands in primarily loose soils. Often found in areas with harvester ants.	<i>Not expected.</i> No suitable habitat exists within the survey area. Historical locations occur approximately 0.50 mile east of the survey area but not within (Figure 8; SanGIS 2025).
Birds				
<i>Athene cunicularia</i>	Western burrowing owl	BCC/SSC/—/ MSCP	Occurs in open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	<i>Low foraging, low nesting.</i> No suitable preferred foraging or nesting habitat exists within the survey area. While some rubble piles are available, no open areas or undisturbed areas (lack of human presence) occur. A historical location occurs on Fiesta Island approximately 0.80 mile north of the survey area but not within (Figure 8; CDFW 2025a).
<i>Charadrius nivosus nivosus</i>	Western snowy plover	FT/SSC/—/MSCP	Occurs along coastlines in San Diego County and nests along beaches, dunes, and salt flats.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat. The presence of the San Diego River and suitable habitat within 1 mile of the survey area could allow for incidental individuals passing through the area, but this species is more likely to be restricted to the coastline. A historical nest was documented south of the survey area near the San Diego International Airport in 1979 (Figure 8; CDFW 2025a).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Coccyzus americanus occidentalis</i>	Western yellow-billed cuckoo	FT/SE/—/MSCP	Occurs in in dense riparian thickets or forests, particularly where willow species (<i>Salix spp.</i>) are present. Nesting also occurs in riparian areas, generally near willows.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area. Survey area is completely developed with impervious surfaces and buildings. A historical location occurs approximately 0.75 mile west of the survey area but not within, and is likely extirpated (Figure 8; USFWS 2025b).
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	FE/SE/—/MSCP	Occurs in habitat often near riparian areas especially with willows species.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area. Survey area is completely developed with impervious surfaces and buildings. No historical locations occur within 1 mile (USFWS 2025b).
<i>Falco peregrinus anatum</i>	American Peregrine falcon	None/None/ None/MSCP	Occurs in open landscapes with cliffs (or skyscrapers) for nest sites and along rivers and coastlines or in cities.	<i>Moderate foraging, not expected nesting.</i> Open areas for foraging adjacent to the San Diego River corridor are limited to the northern edge of the survey area. No cliffs, skyscrapers, or other tall buildings suitable for nesting exist within the survey area. Historical locations occur within 1 mile of the survey area in an unspecified location (USFWS 2025b).
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	FT/SSC/—/MSCP	Found in dense coastal sage scrub, occasionally baccharis scrub, and chaparral in Southern California to Baja Mexico below 2,500 feet amsl.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area. Survey area is completely developed with impervious surfaces and buildings. No historical locations occur within 1 mile (USFWS 2025b).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR/Regional	Habitat	Potential to Occur
<i>Rallus obsoletus levipes</i>	Light-footed Ridgway's rail	FE, FP/SE—/MSCP	Restricted to coastal marshes but also are known to forage in freshwater inlets to coastal marshes (USFWS 1979).	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area, as this species is restricted to marsh habitat. Historical locations occur within the marshland surrounding the San Diego River approximately 0.40 mile north of the survey area but not within (Figure 8; CDFW 2025a; SanGIS 2025).
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	BCC/SE—/MSCP	Found year round in coastal salt marshes and have a strong association with dense areas of pickleweed (<i>Salicornia pacifica</i>) (CDFW 2010). Nesting and foraging occur within salt marsh habitat.	<i>Not expected foraging, not expected nesting.</i> Survey area is completely developed with impervious surfaces and buildings. No open tidal areas with low vegetation required to support foraging and available exist in the survey area. Historical locations occur within the marshland surrounding the San Diego River approximately 0.40 mile north of the survey area but not within (Figure 8; CDFW 2025a; SanGIS 2025).
<i>Sternula antillarum browni</i>	California least tern	FE, FP/SE—/MSCP	Nests on open sandy dunes and flats lacking vegetation in colonies along California coastlines, in lagoons, bays, and estuaries.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area. Survey area is completely developed with impervious surfaces and buildings. No established colonies are in the survey area. Historical locations occur within 1 mile north and south of the survey area but not within (Figure 8; CDFW 2025a; SanGIS 2025).

Table 1. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/ CRPR/Regional	Habitat	Potential to Occur
<i>Vireo bellii</i> ssp. <i>pusillus</i>	Least Bell's vireo	FE/SE/—/MSCP	Occurs in a variety of habitats, but most often associated with riparian habitat, often with willow species. Requires dense understory shrub cover for nest concealment, with an overstory dominated by willows.	<i>Not expected foraging, not expected nesting.</i> No suitable foraging or nesting habitat exists within the survey area. Survey area is completely developed with impervious surfaces and buildings. Historical locations are documented within the San Diego River and surrounding habitat between 0.60 and 0.90 mile northeast of the survey area but not within (Figure 8; CDFW 2025a; USFWS 2025b; SanGIS 2025).
Mammals				
<i>Chaetodipus fallax</i>	Northwestern San Diego pocket mouse	None/SSC/—/ None	Found in Southern California to central Baja California within sandy, herbaceous areas in coastal sage scrub habitats and grasslands.	<i>Not expected.</i> Survey area is completely developed with impervious surfaces and buildings. No suitable habitat exists within the survey area, and no historical locations occur within 1 mile (USFWS 2025b).
<i>Choeronycteris mexicana</i>	Mexican long-tongued bat	None/SSC/—/ None	Roosts in caves, mines, rock crevices, under exposed tree roots, and in buildings. In the County, exclusively roosts in human-made structures Mostly found during fall and winter in the County. Forages on nectar, particularly from agave and cactus species.	<i>Not expected roosting, moderate foraging.</i> Ornamental century plants are available in portions of the survey area for foraging. Roosts are available in the buildings in the survey area, particularly the San Diego International Sports Arena, which contains overhang features. No suitable foraging habitat or roosting habitat are present within the off-site improvements areas. A historical location from 1984 occurs approximately 0.20 mile east of the survey area but not within (Figure 8; CDFW 2025a).

Notes: amsl = above mean sea level; BCC = USFWS bird of conservation concern; FC = federal candidate; FE = federally endangered; FP = federally protected; FT = federally threatened; I- = Interstate; MSCP = City of San Diego MSCP SAP covered species; None = No status indicated for species; SE = state endangered; SSC = state species of special concern
CNPS CRPR Rare Plant Ranking: 1B = rare, threatened, or endangered in California and elsewhere; 2B = rare, threatened, or endangered in California but more common elsewhere; 3 = a watch list of species about which more information is needed; 4 = a watch list of species of limited distribution
Threat Ranks: .1 = seriously threatened; .2 = moderately threatened; .3 = not very threatened in California

Sensitive Plant Species

No sensitive plant species were observed during the September 2023 and February 2024 surveys; therefore, a focused rare plant survey was not conducted. No sensitive plant species were determined to have a high potential to occur in the survey area.

Sensitive Wildlife Species

No sensitive wildlife species were observed during the September 2023 and February 2024 surveys. No sensitive wildlife species were determined to have a high potential to occur in the survey area.

Nesting Birds

The survey area contains suitable nesting habitat for several bird and raptor species protected under the CFGC and MBTA. Existing trees, including eucalyptus and palm species, are present along the edges of the survey area, which provide suitable nesting habitat for many species, including hummingbirds and raptors. Structures that have eaves, crevices, cracks, and other “cavities,” including the San Diego International Sports Arena, may provide nesting opportunities for other nesting birds, such as black phoebes (*Sayornis nigricans*), which attach their nests to undersides of structures with mud, or gulls, which often use building roofs for nesting.

Roosting Bats

A daytime survey for potential roosting habitat within the survey area was performed by bat specialist Drew Stokes (SDNHM) during the general biological reconnaissance survey. While no bat species or obvious sign thereof (e.g., guano, staining) were observed, the San Diego International Sports Arena structure was too large and tall for one specialist alone to adequately assess the location during the daytime. The San Diego International Sports Arena has a number of overhang features with obvious crevices below the overhangs that could potentially support crevice roosting bat species such as the Mexican free-tailed bat (*Tadarida brasiliensis*) and Yuma myotis (*Myotis yumanensis*). These species are common in San Diego County and are often found roosting in crevices provided by large, thermally stable structures such as the San Diego International Sports Arena.

Unable to fully assess the San Diego International Sports Arena during the day, biologists conducted an evening exit count bat survey instead. Biologists were in place at observation stations around the San Diego International Sports Arena, focusing on the overhang features by 6:00 p.m. (official sunset 6:07 p.m.) and made observations for 1 hour past sunset (7:07 p.m.), well beyond the expected bat exodus time of approximately 15 minutes past sunset. The weather was relatively warm with little to no wind, which creates ideal conditions for a bat exodus. In addition, in an attempt to make visual observations, bat specialist Drew Stokes used a handheld Anabat Walkabout bat detector to monitor bat echolocation calls real time during the survey period.

No bats were observed exiting the San Diego International Sports Arena structure during the observation period between 6:00 p.m. and 7:07 pm. No bat echolocation calls were detected by the handheld Anabat Walkabout bat detector. It was concluded that no bats were roosting or present on site during the observation period. There were also no observations of nocturnal incidental wildlife, including owls, exiting the San Diego International Sports Arena.

The survey area contains ornamental plants, including agave species, primarily surrounding the residential and commercial developments, that could provide suitable foraging habitat for a variety of common and sensitive bat species, including the Mexican long-tongued bat (*Choeronycteris mexicana*). However, this species requires a cave-like structure for roosting, which is not available within the survey area.

As previously discussed in the Methods section, it was determined that no suitable roosting habitat is present in the off-site improvements areas. Therefore, no focused bat roosting surveys were conducted in those locations.

Critical Habitat

No critical habitat for sensitive plants or wildlife occurs in the survey area. The nearest critical habitat to the survey area is for San Diego fairy shrimp (*Branchinecta sandiegonensis*), which is located approximately 5.50 miles northeast and approximately 5.50 miles southeast of the survey area.

Wildlife Corridors and Linkages

Wildlife corridors provide routes for local movement and regional linkages and corridors, often following linear topographic, vegetation, or water features. These corridors can be continuous habitats features, or “stepping stone” areas, providing critical rest and foraging areas for, for example, birds traveling along migratory routes. Local routes of movement provide constant connections to resources that include sources of water, home/cover sites, and foraging areas. Regional linkages and movement corridors provide larger patches of open space to allow relatively free movement of wildlife species along multiple paths between important resources. These areas allow for not only long-term genetic flow between subpopulations but also critical pathways of seasonal/migratory movements. Larger predatory mammals often use regional corridors for hunting and reproduction needs. Potential wildlife corridors can include streams, riparian areas, and culverts under roadways. Habitat characteristics considered included topography, habitat quality, and adjacent land uses.

The MSCP SAP defines core and linkage areas as those maintaining ecosystem function and processes, including large wildlife movement. Each core area is connected to other core areas or to habitat areas outside the MSCP SAP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained.

Although the survey area is highly developed and generally surrounded by developed areas, it is approximately 0.04 mile south of the San Diego River and 0.40 mile south of the surrounding Mission Valley Preserve, which are both considered important habitat linkages between core resource areas within the MSCP and the MHPA, as well as Point Loma (County of San Diego 1998). The survey area is likely to be used as a wildlife movement corridor and provides some suitable nesting, foraging, and dispersal areas for some wildlife species because of the presence of ornamental vegetation and structures. However, the survey area is separated from the San Diego River and the Mission Valley Preserve habitats by I-8; therefore, the survey area likely only provides major movement opportunities for bird species. The survey area also provides some local movement opportunities for terrestrial species such as reptiles, mesocarnivores (i.e., raccoons), and potentially common, non-sensitive rodent species. However, the surrounding dense urban development restricts use of the survey area for large mammals.

The survey area holds value for MBTA-protected migrating birds flying through to wintering or breeding grounds. The survey area is within the Pacific Flyway, along which millions of birds, especially waterfowl, migrate annually between Alaska and Canada, through California, to Mexico and South America. Coastal San Diego provides an important stopover area for a large variety of birds during their annual migration. The ornamental vegetation and structures throughout the survey area and along the edges of the off-site improvements areas could potentially support migrants due to their proximity to the San Diego River, Mission Valley Preserve, and Mission Bay; however, the absence of native vegetation, water, and refugia within the dense residential and commercial development of the survey area potentially limits migratory bird use of the survey area.

Impacts Analysis

Significance Thresholds and Definition of Impacts

Based on the CEQA Environmental Checklist (Appendix G of the CEQA Guidelines), direct or primary effects are those that are caused by a project and occur at the same time and place; indirect or secondary effects are those that are reasonably foreseeable and caused by a project but occur at a different time or place; and cumulative effects refers to two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts.

The thresholds used to evaluate potential biological resources impacts are generally based on the City's CEQA Significance Determination Thresholds (City of San Diego 2016) to be consistent with the Midway-Pacific Highway Community Plan Update Program Environmental Impact Report.

A significant impact on biological resources could occur if implementation of the Project would result in the following:

1. **Issue 1:** A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP SAP or other local or regional plans, policies or regulations, or by CDFW or USFWS;
2. **Issue 2:** A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;
3. **Issue 3:** A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
4. **Issue 4:** Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites; or
5. **Issue 5:** A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP or in the surrounding region.

Direct Impacts

A direct impact is a physical change in the environment that is caused by and immediately related to a project. Construction activities associated with implementation of the Project could result in direct impacts to biological resources including but not limited to the following:

- Direct removal of vegetation and/or land cover during construction activities by means of excavation, demolition, grading, and vegetation clearing/grubbing/crushing
- Mortality of sensitive wildlife species from vehicular collision
- Destruction or abandonment of nests

Lands containing Tier I, II, IIIA, and IIIB (Table 3 from the City's Biology Guidelines) and all wetlands (Tables 2A and 2B from the City's Biology Guidelines) are considered sensitive and declining habitats (Table 2, Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources). As such, with the following two exceptions, impacts to these resources would be significant (City of San Diego 2018b):

- a. If the total proposed project upland impacts affect less than 0.10 acre, then they would not be considered significant and would not require mitigation.
- b. Any proposed project impacts to non-native grasslands totaling less than 1 acre that are completely surrounded by urban development would not be considered significant and would not require mitigation.

Lands designated as Tier IV (e.g., developed land) are not considered to have significant habitat value, and impacts to these communities would not be considered significant. The Project site is outside the Coastal Overlay Zone (COZ) and occurs entirely on Tier IV habitat.

Table 2. Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources

Resource Type	Impact Threshold	Significance of Impact
Native Uplands (Tier I, II, IIIA, or IIIB)	Less than 0.10 acre	Not significant
	0.10 acre or greater	Significant, requires mitigation
Non-Native Grassland (Tier IIIB)	Less than 1 acre in an urban setting	Not significant
	1 acre or greater in an urban setting	Significant, requires mitigation
Disturbed and Developed Land (Tier IV)	Any impacts	Not significant
Jurisdictional Waters	Any impacts within the COZ	Significant, requires mitigation
Wetlands	Any impact within the COZ	Significant, requires mitigation

Source: City of San Diego 2024.

Notes: COZ = Coastal Overlay Zone

Impacts to individual sensitive plants species, aside from impacts to sensitive habitat, may also be considered significant based on the rarity and extent of impacts. In general, conformance with the MSCP SAP provides incidental take coverage for covered species (both plants and wildlife) such that impacts to those species outside the City’s MHPA would not be considered significant (due to conservation of the species provided by MSCP SAP implementation). Exceptions to this would be impacts that occur to narrow endemic covered species, non-covered species that are state- or federally listed species and/or have a California Rare Plant Rank (CRPR) of 1B.1, 1B.2, or 2B.2, or covered species that are within the MHPA (City of San Diego 2018b). Impacts to plant species ranked CRPR 3 and 4 would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist (i.e., CRPR 4 species are not considered “rare” from a statewide perspective) (Table 3, Significance of Potential Impacts to Sensitive Plant Species).

Table 3. Significance of Potential Impacts to Sensitive Plant Species

Species Rarity	Location of Species	Significance of Impact
MSCP SAP Covered Species	Any	Significant, requires mitigation
MSCP SAP Narrow Endemic	Any	Significant, requires mitigation
Federally or State Listed	Any	Significant, requires mitigation
CRPR 1B.1, 1B.2, and 2B.2	Any	Significant, requires mitigation
CRPR 3 and 4	Any	Not significant

Notes: CRPR = California Rare Plant Rank; MSCP = Multiple Species Conservation Program; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan

The City’s permit to “take” covered species under the MSCP SAP is based on the concept that approximately 90 percent of lands within the MHPA will be preserved. No Project-related activities would occur within MHPA land; therefore, no MHPA boundary line adjustments are anticipated as a result of Project implementation.

Indirect Impacts

Indirect impacts are reasonably foreseeable changes in the environment that may be caused by Project implementation on remaining or adjacent biological resources outside a direct impact area, such as downstream and adverse edge effects. Indirect impacts include short-term effects immediately related to

construction activities and long-term or chronic effects occurring after construction. Indirect impacts that would result in loss of area or function of wetlands, Tier I-III upland vegetation habitats, or sensitive species may be considered significant. Potential indirect effects resulting from Project implementation may include elevated levels of noise or lighting; increased erosion, sedimentation, and fugitive dust; and the introduction or increased presence of non-native species. These types of indirect impacts can affect surrounding vegetation communities or their potential use by sensitive species. They can also cause the disruption of normal wildlife functions or activities, impacting individual species.

Threshold 1: Sensitive Plant and Wildlife Species

Guidelines for Determination of Significance

Significant impacts could result if the Project would have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP SAP or other local or regional plans, policies, or regulations or by the CDFW or USFWS.

Impact Analysis

Sensitive Plant Species

Direct Impacts

Project Site. No plant species listed as candidate, sensitive, or otherwise considered special status were observed during the biological reconnaissance surveys, and no sensitive plant species have a high potential to occur on the Project site. Furthermore, vegetation observed on the Project site consisted of landscaped/ornamental species and is not conducive to the success of sensitive plant growth. Therefore, Project implementation would not result in direct impacts to sensitive plant species. Direct impacts to sensitive plant species would not occur, and no mitigation is required.

Off-Site Improvements Areas. No plant species listed as candidate, sensitive, or otherwise considered special status were observed during the biological reconnaissance surveys, and no sensitive plant species have a high potential to occur in the off-site improvements areas. Furthermore, the limited vegetation observed in the off-site improvements areas consisted of landscaped/ornamental species and is not conducive to the success of sensitive plant growth. Therefore, implementation of the off-site improvements would not result in direct impacts to sensitive plant species. Direct impacts to sensitive plant species would not occur, and no mitigation is required.

Indirect Impacts

Project Site. As discussed in the Direct Impacts section, no sensitive plant species were observed during the biological reconnaissance surveys, and no sensitive plant species have the potential to occur on the Project site. The entire Project site and surrounding areas are developed with landscaped/ornamental vegetation and are unlikely to support sensitive plant species. Therefore, Project implementation would not result in indirect impacts to sensitive plant species. Indirect impacts to sensitive plant species would not occur, and no mitigation is required.

Off-Site Improvements Areas. As discussed in the Direct Impacts section, no sensitive plant species were observed during the biological reconnaissance surveys, and no sensitive plant species have the potential to occur in the off-site improvements areas. The off-site improvements areas are completely developed with limited landscaped/ornamental vegetation and are unlikely to support sensitive plant species. Therefore, implementation of the off-site improvements would not result in indirect impacts to sensitive plant species. Indirect impacts to sensitive plant species would not occur, and no mitigation is required.

Sensitive Wildlife Species

Direct Impacts

Project Site. The entire Project site is urban/developed land with small areas of landscaped/ornamental vegetation surrounded by hardscape. Project implementation would not result in a loss of any sensitive vegetation communities that could support sensitive wildlife species. No sensitive wildlife species were observed on the Project site, and no sensitive wildlife species have a high potential to occur on the Project site. Furthermore, vegetation observed on the Project site consisted of landscaped/ornamental species and is unlikely to support sensitive wildlife species. Therefore, Project implementation would not result in direct impacts to sensitive wildlife species. Direct impacts to sensitive wildlife species would not occur, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements areas consist entirely of urban/developed land with limited landscaped/ornamental vegetation surrounded by hardscape. Implementation of the off-site improvements would not result in a loss of any sensitive vegetation communities that could support sensitive wildlife species. No sensitive wildlife species were observed in the off-site improvements areas, and no sensitive wildlife species have a high potential to occur in the off-site improvements areas. Furthermore, the limited vegetation observed in the off-site improvements areas consisted of landscaped/ornamental species and is unlikely to support sensitive wildlife species. Therefore, implementation of the off-site improvements would not result in direct impacts to sensitive wildlife species. Direct impacts to sensitive wildlife species would not occur, and no mitigation is required.

Indirect Impacts

Project Site. As discussed in the Direct Impacts section, no sensitive wildlife species were observed during the biological reconnaissance surveys, and no sensitive wildlife species have the potential to occur on the Project site. The Project site is completely developed with small areas of landscaped/ornamental vegetation surrounded by hardscape and is unlikely to support sensitive wildlife species. Therefore, Project implementation would not result in indirect impacts to sensitive wildlife species. Indirect impacts to sensitive wildlife species would not occur, and no mitigation is required.

Off-Site Improvements Areas. As discussed in the Direct Impacts section, no sensitive wildlife species were observed during the biological reconnaissance surveys, and no sensitive wildlife species have the potential to occur in the off-site improvements areas. The off-site improvements areas are completely developed with limited landscaped/ornamental vegetation surrounded by hardscape and are unlikely to support sensitive wildlife species. Therefore, implementation of the off-site improvements would not result in indirect impacts to sensitive wildlife species. Indirect impacts to sensitive wildlife species would not occur, and no mitigation is required.

Nesting Birds

Project Site. Project implementation has the potential to directly and indirectly impact nesting birds. Direct impacts include removal of suitable nesting habitat in the form of some trees and building structures that occur throughout the survey area. Indirect impacts from Project-generated noise and vibration during digging, clearing, and grubbing activities if conducted during the bird breeding season could also result in significant temporary impacts to bird species protected under the MBTA. However, the Project would comply with the MBTA and CFGC Section 3503 by prohibiting take of birds, nests, or eggs; therefore, direct and indirect impacts to nesting birds would be less than significant, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements areas are limited to the developed roadways and intersections and do not include suitable nesting habitat for birds. Further, implementation of the off-site improvements would not include the removal of structures, trees, or ornamental vegetation that could provide potential nesting bird habitat. Implementation of the off-site improvements may result in indirect impacts from construction-generated noise and vibration during digging, clearing, and grubbing activities if conducted during the bird breeding season and could result in significant temporary impacts to bird species

protected under the MBTA. However, the off-site improvements would comply with the MBTA and CFGC Section 3503. Therefore, direct and indirect impacts to nesting birds would be less than significant, and no mitigation is required.

Roosting Bats

Project Site. The San Diego International Sports Arena may present suitable roosting habitat for several bat species. Additionally, trees throughout the Project site could support tree roosting bats, and ornamental vegetation provides suitable foraging habitat for many sensitive and common species. A daytime survey to determine potential roosting habitat and a nighttime emergence survey for bats were performed by bat specialist Drew Stokes (SDNHM), who confirmed absence of both common and sensitive bat species on the Project site. Therefore, no potential direct or indirect impacts to roosting bats would occur, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements areas are limited to the developed roadways and intersections and do not include suitable roosting habitat for bats. Further, implementation of the off-site improvements would not include the removal of structures, trees, or ornamental vegetation that could provide potential roosting bat habitat. Therefore, no potential direct or indirect impacts to roosting bats would occur, and no mitigation is required.

Threshold 2: Sensitive Vegetation Communities

Guidelines for Determination of Significance

Significant impacts could result if the Project would have a substantial adverse impact on any Tier I, II, IIIA, or IIIB habitats as identified in the City's Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

Impact Analysis

Direct Impacts

Project Site. The entire Project site, 49.23 acres, is composed of urban/developed land, which is a Tier IV habitat and is not considered a sensitive natural vegetation community. No jurisdictional waters or Environmentally Sensitive Lands are mapped on the Project site. Therefore, no direct impacts to sensitive natural vegetation communities are anticipated as a result of Project implementation, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements areas are composed entirely of urban/developed land, which is a Tier IV habitat and is not considered a sensitive natural vegetation community. Therefore, no direct impacts to sensitive natural vegetation communities are anticipated from implementation of the off-site improvements, and no mitigation is required.

Indirect Impacts

Project Site. As discussed in the Direct Impacts section, the entire Project site consists of urban/developed land. The immediate surrounding areas are also entirely developed and do not support native vegetation communities. The nearest sensitive natural vegetation communities occur approximately 0.04 mile north of the Project site and are separated from the Project site by a heavily trafficked highway, I-8. Additionally, the Project would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines, which includes the City's CEQA Significance Determination Thresholds with respect to biological resources. In addition, the Project would be required to implement construction best management practices (BMPs) to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological resources in compliance with the National Pollutant Discharge Elimination System (NPDES) regulations and City's Stormwater Standards Manual (City of San Diego 2012). Therefore, no indirect impacts would occur as a result of Project implementation, and no mitigation is required.

Off-Site Improvements Areas. As discussed in the Direct Impacts section, the off-site improvements areas consist entirely of urban/developed land. The immediately surrounding areas are also entirely developed and do not support native vegetation communities. The nearest sensitive natural vegetation communities occur approximately 0.40 mile north of the off-site improvements areas and are separated from the off-site improvements areas by a heavily trafficked highway, I-8. Additionally, the off-site improvements would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines. In addition, the off-site improvements would be required to implement construction BMPs to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological resources in compliance with the NPDES regulations and City's Stormwater Standards Manual (City of San Diego 2012). Therefore, no indirect impacts would occur from implementation of the off-site improvements, and no mitigation is required.

Threshold 3: Jurisdictional Aquatic Resources

Guidelines for Determination of Significance

A significant impact could result if the Project would have a substantial adverse impact on wetlands (including but not limited to marsh, vernal pool, and riparian) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

Direct Impacts

Project Site. A formal aquatic resources delineation was not conducted during the biological reconnaissance surveys; however, the site was assessed for potential jurisdictional resources. No aboveground aquatic resources were observed on the Project site. The storm drains, including the storm drain that would be relocated, and additional storm drain features identified on the Project site likely convey urban stormwater through developed land to jurisdictional resources, including the San Diego River and Mission Bay to the north. However, these features are entirely underground and, therefore, are not under the jurisdiction of the USACE, RWQCB, or CDFW pursuant to Sections 404 and 401 of the CWA and Section 1600 of the CFGC. The Project would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines, which includes the City's CEQA Significance Determination Thresholds with respect to biological resources. In addition, the Project would be required to implement construction BMPs to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological and aquatic resources in compliance with the NPDES regulations and City's Stormwater Standards Manual (City of San Diego 2012). Additionally, all proposed stormwater drainage improvements would be designed to collect and treat stormwater before it discharges off site through a combination of biofiltration planters and modular wetland units. Therefore, no direct impacts are anticipated as a result of Project implementation, and no mitigation is required.

Off-Site Improvements Areas. A formal aquatic resources delineation was not conducted during the biological reconnaissance surveys; however, the off-site improvements areas were assessed for potential jurisdictional resources. No aboveground aquatic resources were observed in the off-site improvements. The storm drains and additional storm drain features identified in the off-site improvements areas likely convey urban stormwater through developed land to jurisdictional resources, including the San Diego River and Mission Bay to the north. However, these features are entirely underground and, therefore, are not under the jurisdiction of the USACE, RWQCB, or CDFW pursuant to Sections 404 and 401 of the CWA and Section 1600 of the CFGC. The off-site improvements would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines. In addition, the off-site improvements would be required to implement construction BMPs to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological and aquatic resources in compliance with the NPDES regulations and City's

Stormwater Standards Manual (City of San Diego 2012). Therefore, no direct impacts are anticipated from implementation of the off-site improvements, and no mitigation is required.

Indirect Impacts

Project Site. As discussed in the Direct Impacts section, no aboveground aquatic resources under the jurisdiction of the USACE, RWQCB, or CDFW occur on the Project site. Proposed stormwater drainage improvements would convey flows entirely underground to jurisdictional aquatic resources, including the San Diego River and Mission Bay, and would not be under the jurisdiction of the resource agencies. The Project would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines. In addition, the Project would be required to implement construction BMPs to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological and aquatic resources in compliance with the NPDES regulations and City's Stormwater Standards Manual (City of San Diego 2012). Additionally, all proposed stormwater drainage improvements would be designed to collect and treat stormwater before it discharges off site through a combination of biofiltration planters and modular wetland units. Therefore, indirect impacts as a result of Project implementation would be less than significant, and no mitigation is required.

Off-Site Improvements Areas. As discussed in the Direct Impacts section, no aboveground aquatic resources under the jurisdiction of the USACE, RWQCB, or CDFW occur in the off-site improvements areas. The off-site improvements would comply with the MSCP SAP, 2008 General Plan, and City's Biology Guidelines. In addition, the off-site improvements would be required to implement construction BMPs to avoid and minimize potential direct, indirect, and cumulative water quality impacts to off-site downstream biological and aquatic resources in compliance with the NPDES regulations and City's Stormwater Standards Manual (City of San Diego 2012). Therefore, indirect impacts from implementation of the off-site improvements would be less than significant, and no mitigation is required.

Threshold 4: Wildlife Corridors and Habitat Linkages

Guidelines for Determination of Significance

A significant impact could result if the Project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites.

Impact Analysis

Direct Impacts

Project Site. The Project site is approximately 0.40 mile south of the San Diego River and Mission Valley Preserve, both of which are within the MHPA and considered important habitat linkages between core resource areas within the MSCP. However, these lands are separated from the Project site by a major highway, I-8. The Project site is not directly adjacent to or within the MHPA. Therefore, the Project site only provides major movement opportunities for bird species and may provide some local movement opportunities for terrestrial species. The Project site is within the Pacific Flyway and may hold value for MBTA-protected migrating birds as a stopover area due to the presence of trees, ornamental vegetation, and structures. Although removal of these resources could impact migratory birds, the Project would comply with the MBTA and CFGC Section 3503.

The Project would adhere to the SDMC requirements in Section 142.0740 related to lighting and glare and incorporate various design features to reduce the potential for bird strikes. According to the USFWS (USFWS 2025d), glass is an invisible barrier to birds. During the day, they mistakenly fly toward reflections in glass that may deceive them to be natural habitat, such as sky or plants. At night, they are attracted to artificial lights on landscapes and in residences, drawing them closer to windows and other lit structures. According to the California Green Building Standards Code (2022), bird strikes occur predominantly within the first 40

vertical feet of a building. The Project would comply with SDMC Section 142.0740 related to shielding outdoor lighting and directing lighting downward as recommended by the San Diego Audubon Society (SDASD 2024) to avoid bird strikes. Other ways to reduce light would also include minimizing light trespassing in accordance with green building regulations and turning off non-essential lighting during nighttime hours. In addition, during future building design, the Project would consider various design features to reduce the potential for bird strikes, including non-reflective glass, no 100 percent glazed buildings, and balancing of building facades with architectural features. Corridors between Project buildings would allow for safe pathways in which birds can travel throughout the site. Therefore, direct impacts to wildlife movement corridors and habitat connectivity, including migratory birds and bird strikes, would be less than significant, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements areas are a minimum of approximately 0.05 mile south of the San Diego River and Mission Valley Preserve, both of which are within the MHPA and considered important habitat linkages between core resource areas within the MSCP. However, these lands are separated from the off-site improvements areas by dense, urban development and a major highway, I-8, including the I-8 off-ramp. Therefore, the off-site improvements areas likely provide very limited local movement opportunities for bat, bird, and terrestrial species. While the off-site improvements areas are within the Pacific Flyway, they likely have limited value for MBTA-protected migrating birds as stopover areas because of the overall absence of suitable trees, ornamental vegetation, and structures. No structures that could result in bird strikes are proposed in the off-site improvements component of the Project. Further, implementation of the off-site improvements would not include the removal of structures, trees, or ornamental vegetation that could provide potential migratory bird habitat. In the event that removal of these resources is required during implementation and could impact migratory birds, the off-site improvements would comply with the MBTA and CFGC Section 3503, direct impacts would be less than significant, and no mitigation is required.

Indirect Impacts

Project Site. Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed in Threshold 1 for impacts to sensitive wildlife species. However, the Project would comply with the MSCP SAP, 2008 General Plan, City's Biology Guidelines, NPDES regulations, and City's Stormwater Standards Manual, in addition to the MBTA and CFGC Section 3503, and be required to obtain the San Diego RWQCB Municipal (MS4) Permit. As discussed previously, the Project would adhere to the SDMC requirements related to lighting and glare and incorporate various design features to reduce the potential for bird strikes. Therefore, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the Project would be less than significant, and no mitigation is required.

Off-Site Improvements Areas. The off-site improvements would include changes to roadway and intersection components, including modifications to turn signals, lane extensions, and other infrastructure improvements. Implementation of the off-site improvements would not alter the existing limited value these areas have for wildlife movement and habitat connectivity. Therefore, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the off-site improvements would be less than significant, and no mitigation is required.

Threshold 5: Habitat Conservation Plans

Guidelines for Determination of Significance

A significant impact could result if the Project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state Habitat Conservation Plan, either within the MSCP SAP or in the surrounding region.

Impact Analysis

Project Site. The Project site is not within or directly adjacent to the MHPA identified in the MSCP SAP. As previously discussed, the Project would comply with the applicable requirements of the MSCP SAP, specifically the General Management Directives outlined in Section 1.5.2. The General Management Directives applicable to the Project include managing litter, trash, and materials storage and avoiding the introduction of invasive species on the Project site and into the adjacent MHPA, as outlined in Section 1.5.2 of the MSCP SAP. Therefore, no impact associated with a conflict with local conservation plans would occur from the implementation of the Project, and no mitigation is required.

Off-Site Improvements Areas. As previously discussed, the off-site improvements would comply with the requirements of the MSCP SAP. Therefore, no impact associated with a conflict with local conservation plans would occur from implementation of the off-site improvements, and no mitigation is required.

Constraints Analysis Conclusion

Project Site

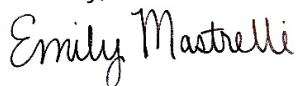
The survey area is developed; however, landscaped/ornamental vegetation throughout provide small areas of suitable habitat for nesting birds. No potentially jurisdictional aquatic resources or Environmentally Sensitive Lands are present on the Project site; however, urban stormwater flows from the site are conveyed underground to jurisdictional resources, including the San Diego River and Mission Bay to the north. The highly developed areas within and immediately surrounding the survey area likely restrict major movement of most wildlife between core habitat areas; however, the proximity of the survey area to the San Diego River and the surrounding Mission Valley Preserve allow for movement of bird species, including migratory birds, through the survey area. The Project would incorporate design features to reduce bird strikes and comply with the MSCP SAP, 2008 General Plan, City's Biology Guidelines, RWQCB Municipal Permit, City's Stormwater Standards Manual, and NPDES regulations in addition to the MBTA and CFGC Section 3503. Additionally, the Project would comply with the SDMC regulations related to lighting and glare and incorporate various design features to reduce the potential for bird strikes. Design specifications and compliance with these regulations would result in less than significant impacts to nesting birds, aquatic resources, and wildlife corridors and linkages, and no mitigation is required.

Off-Site Improvements Areas

The off-site improvements areas would occur entirely within the developed roadways and intersections and would not include the removal of habitat potentially suitable for sensitive or migratory species. Although no potentially jurisdictional aquatic resources or Environmentally Sensitive Lands are present in the off-site improvement areas, urban stormwater flows from the areas are conveyed underground to jurisdictional resources, including the San Diego River and Mission Bay to the north. The off-site improvements would comply with the MSCP SAP, 2008 General Plan, City's Biology Guidelines, RWQCB Municipal Permit, City's Stormwater Standards Manual, and NPDES regulations in addition to the MBTA and CFGC Section 3503. Compliance with these regulations would result in less than significant impacts to nesting birds and aquatic resources, and no mitigation is required.

If you have any questions regarding this letter report, please contact Emily at (619) 510-5372 or Emily.Mastrelli@WeAreHarris.com.

Sincerely,



Emily Mastrelli
Director, Natural Resources

Attachments

- 1, Figures
- 2, Plant Species Observations
- 3, Wildlife Species Observations

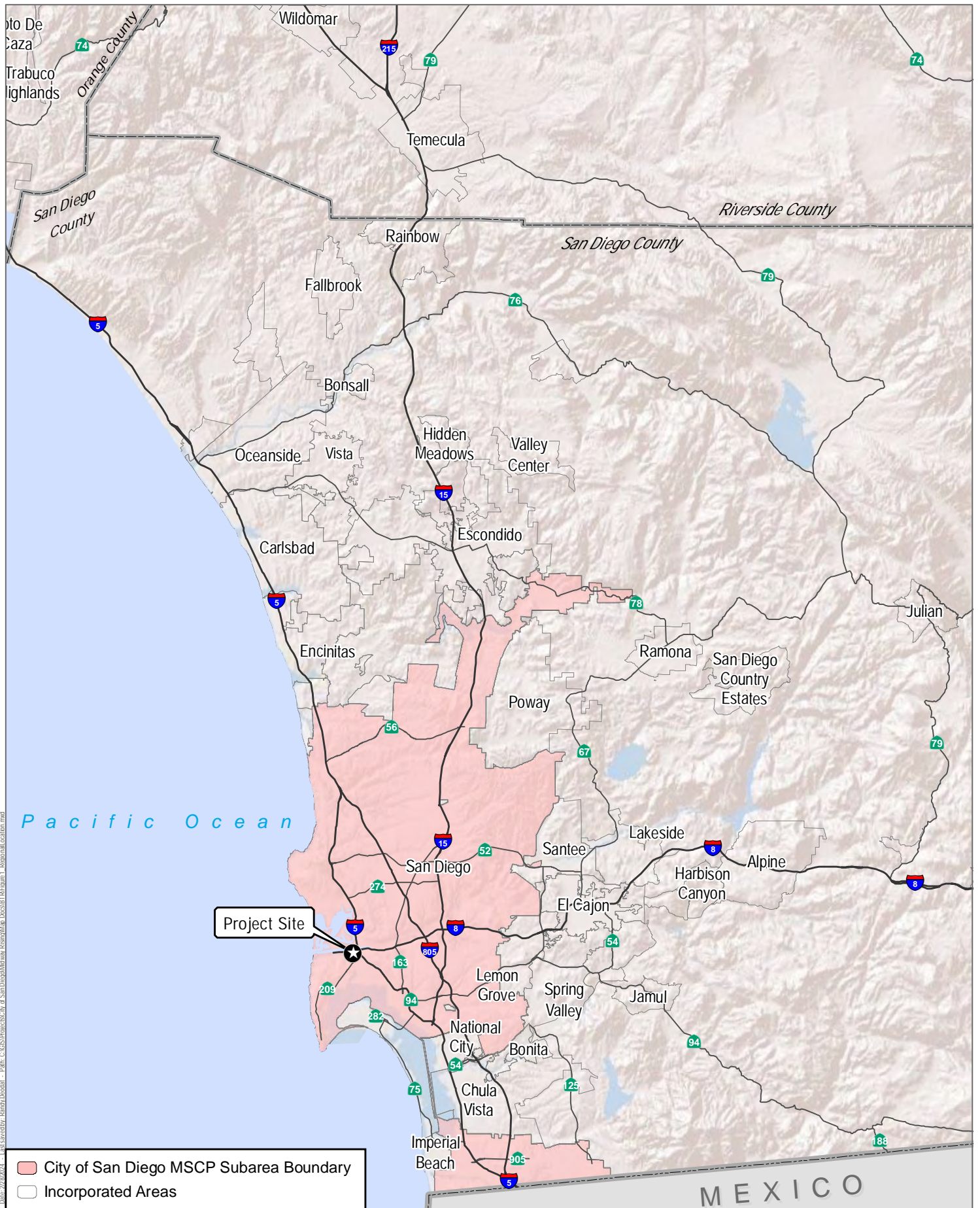
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Attachment 1. Figures

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Date: 2/28/2024 1:53:30 PM Path: C:\GIS\Projects\City of San Diego\MapView\RegionMap_Docs\RI_FullPage_1_RegionLocation.mxd

Source: ESRI 2021.

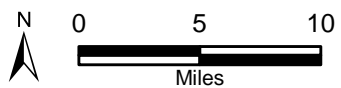
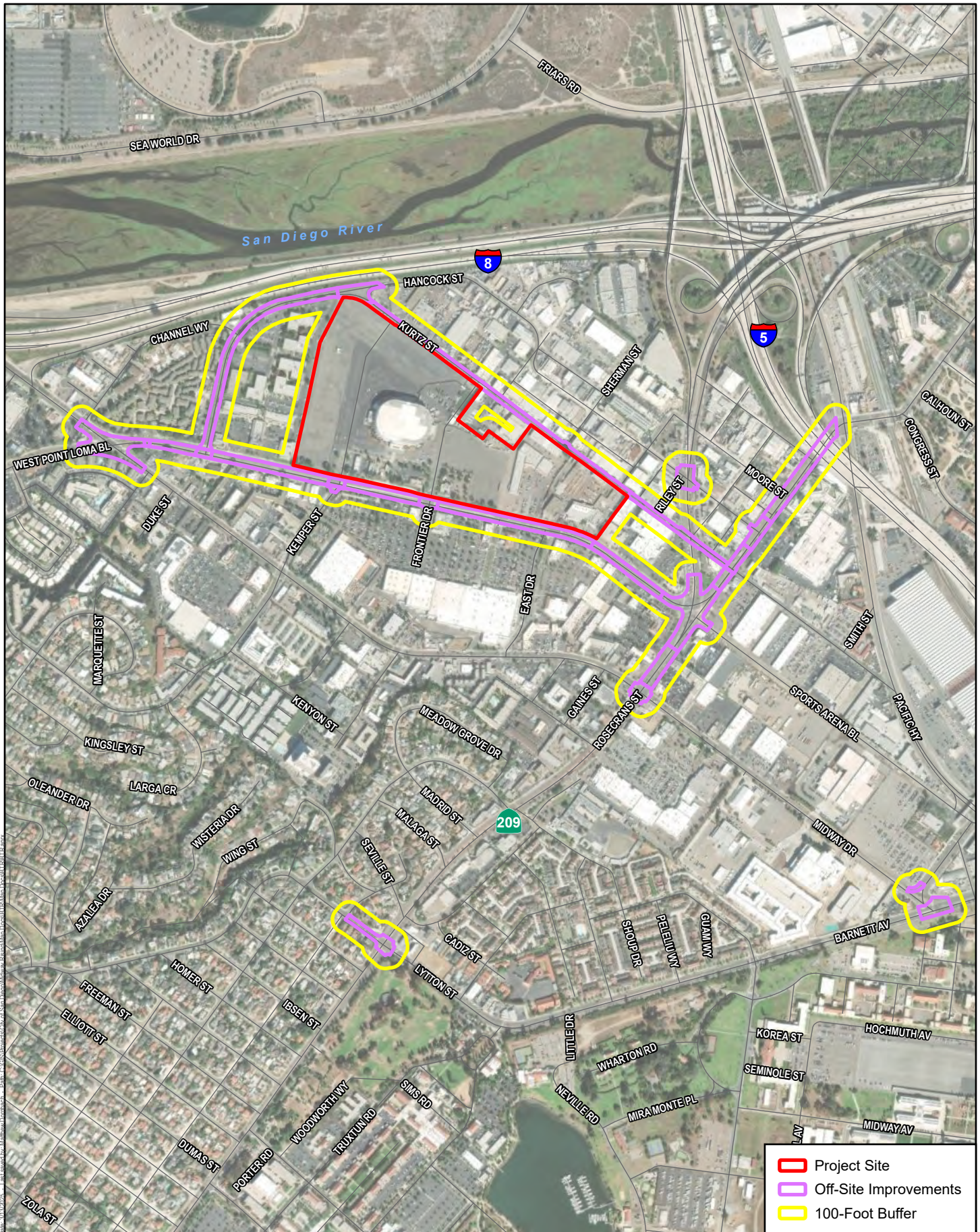


Figure 1
Regional Location
Midway Rising



- ▭ Project Site
- ▭ Off-Site Improvements
- ▭ 100-Foot Buffer

Source: Maxar Imagery 2022.



Figure 2
Project Location
Midway Rising



- A "THE GREEN"
- B "THE SQUARE"
- C "THE PLAZA"
- D PROMENADES
- E STREETSCAPES
- F PASEO GREENS
- G PASEO GREENWAYS
- H RESIDENTIAL BUFFER

Source: CityThinkers 2024.

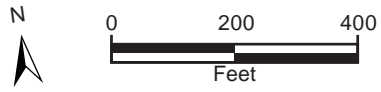
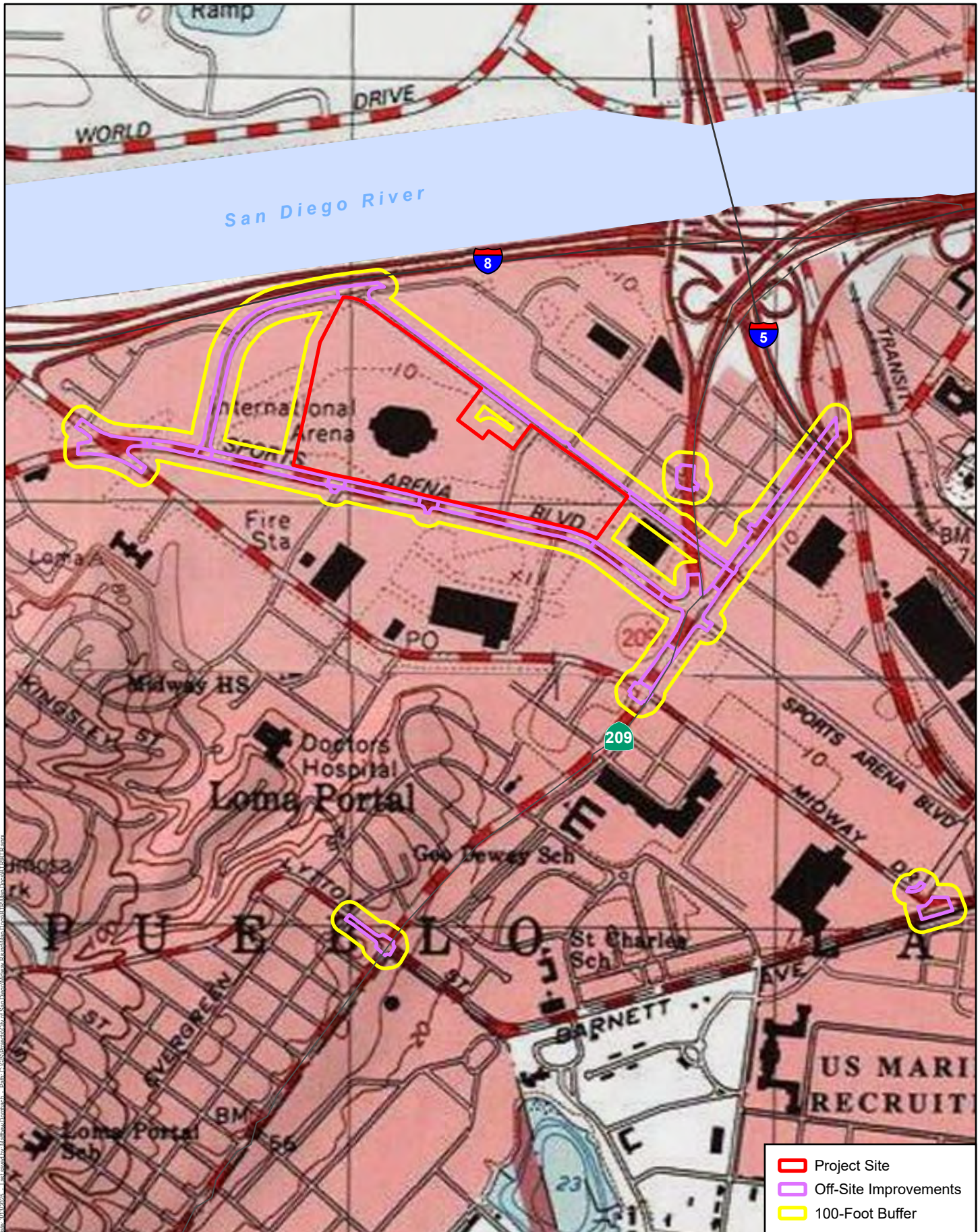


Figure 3
Site Concept Illustrative Map



Source: USGS 7.5 Minute La Jolla Quadrangle 1975 and Point Loma Quadrangle 1967.

Figure 4
 USGS Topographic Map
 Midway Rising

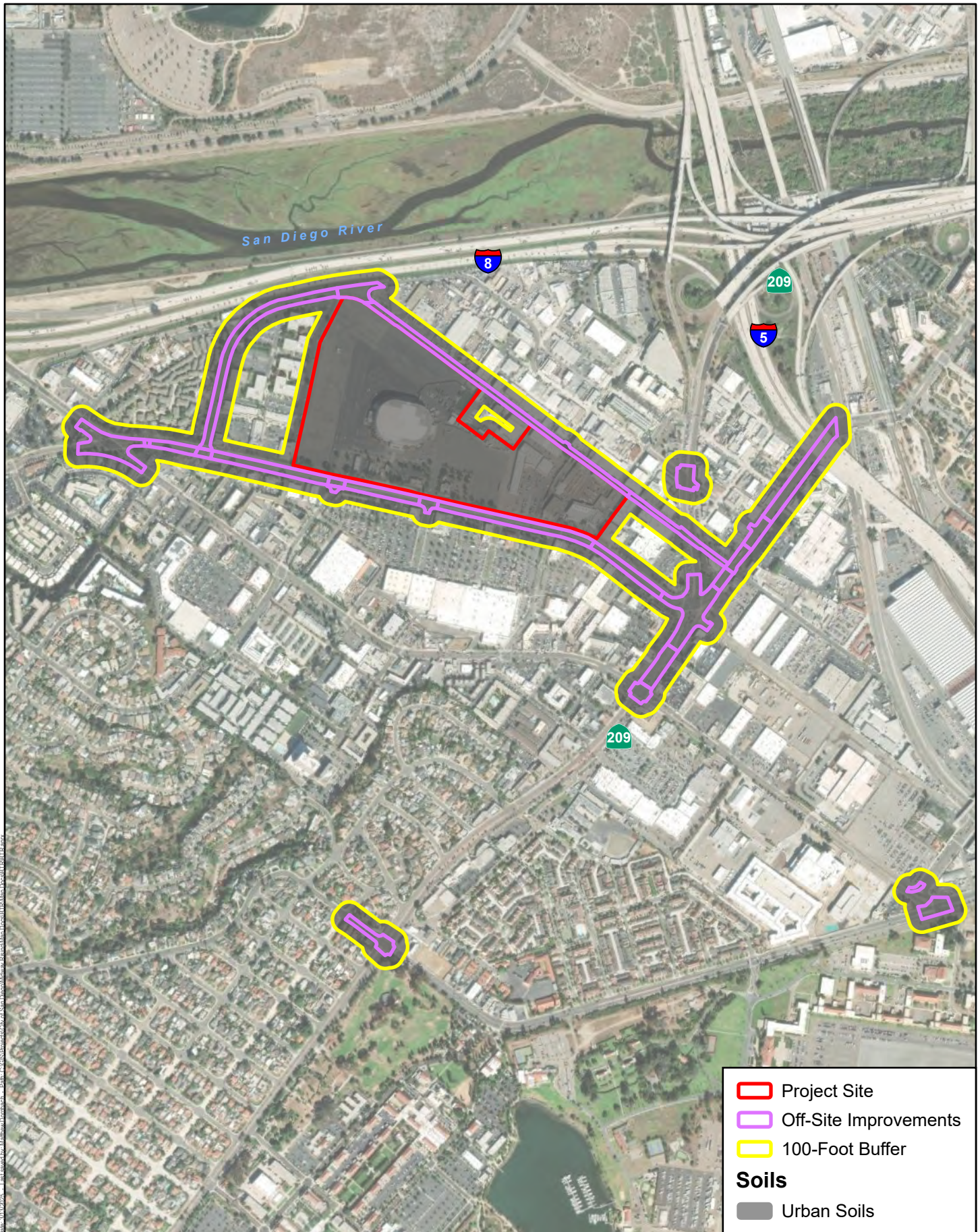
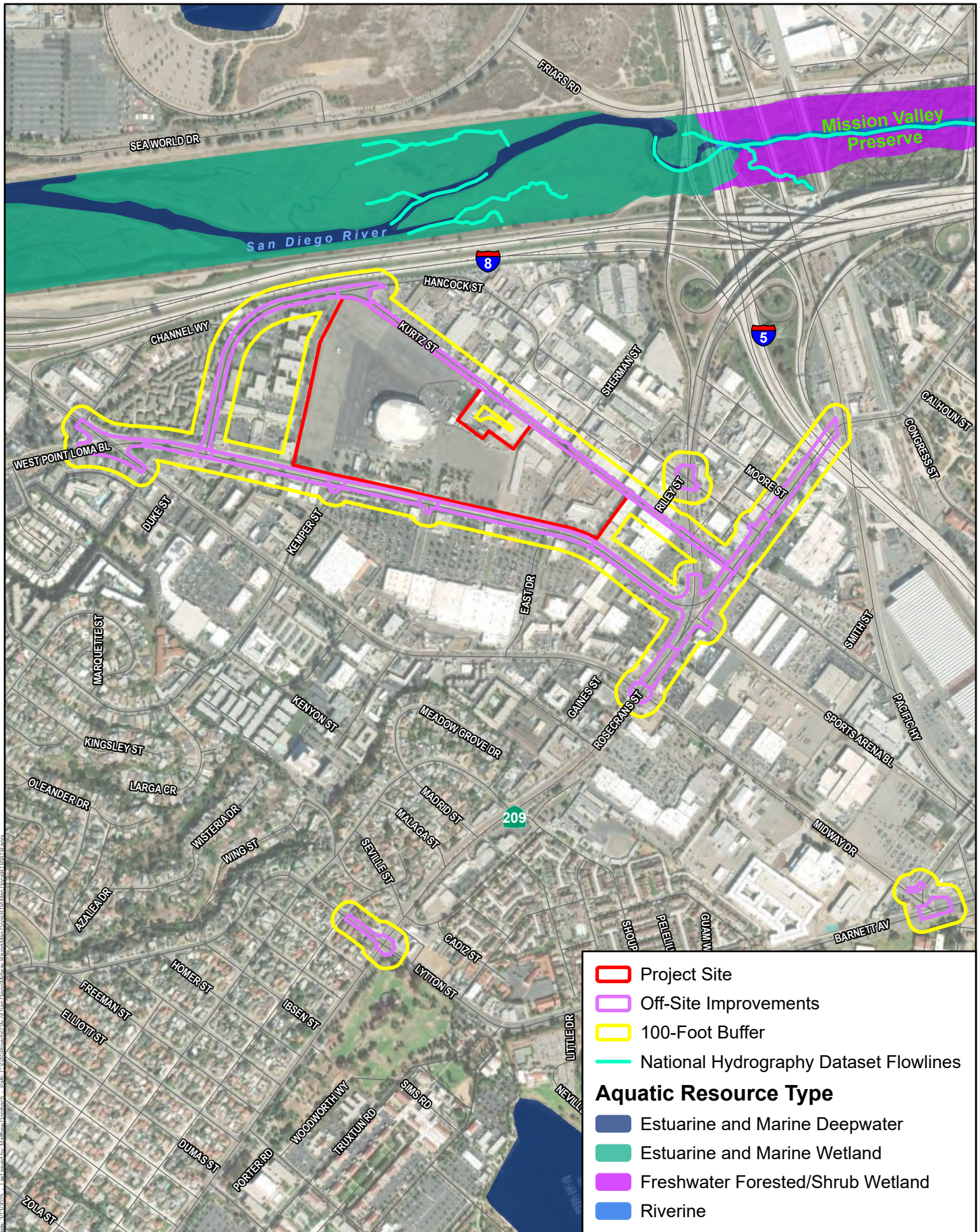


Figure 5

Soils

Midway Rising



Source: USGS Hydrology Database; USFWS 2023; Maxar Imagery 2022.

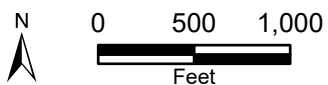
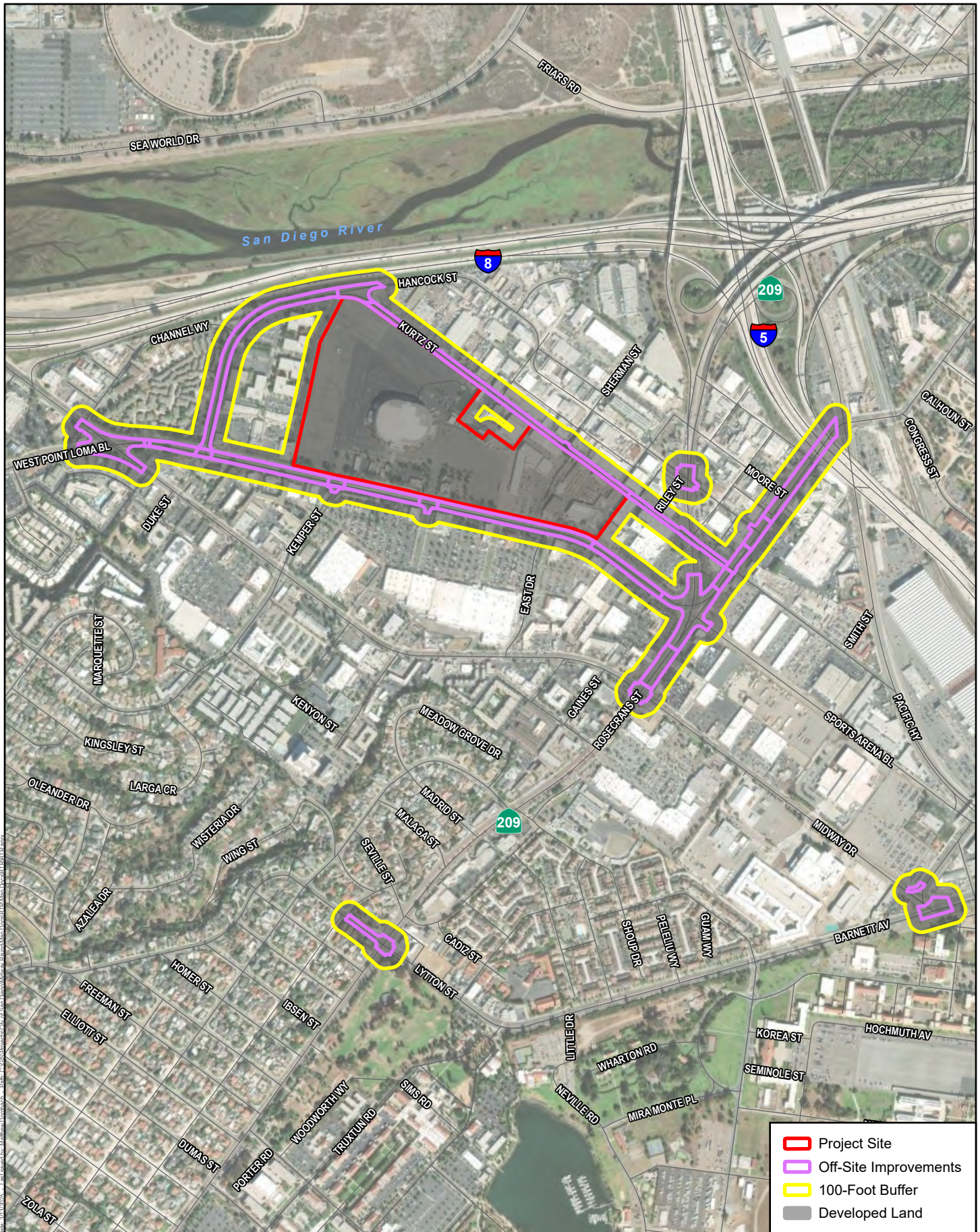


Figure 6
Hydrology
Midway Rising



Source: Maxar Imagery 2022.

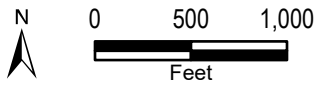
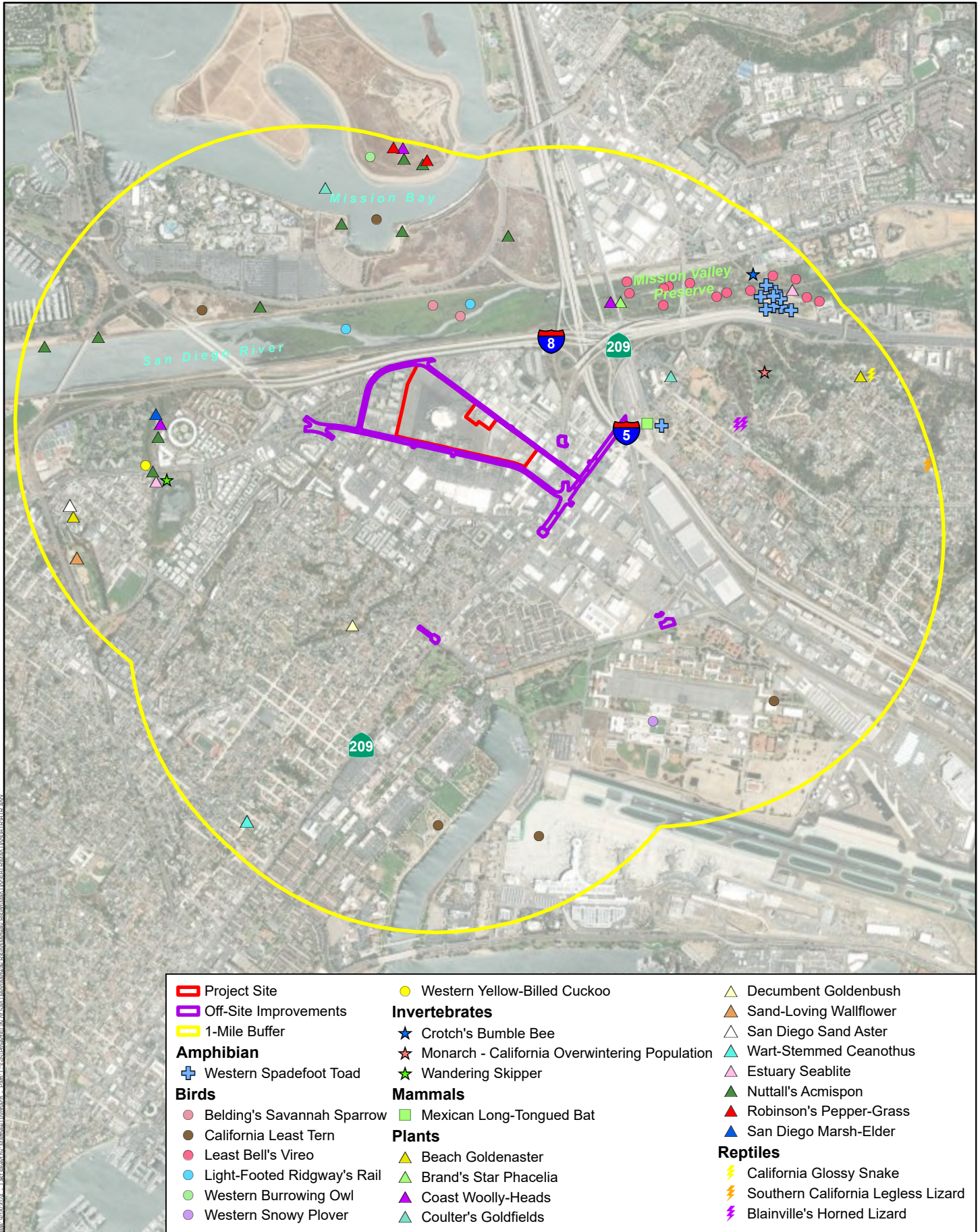


Figure 7
 Land Cover Types
 Midway Rising



Source: SanBIOS 2023; CNDDDB 2023; USFWS 2023; Maxar Imagery 2022.



Figure 8
Sensitive Species with Potential to Occur
Midway Rising

Attachment 2. Plant Species Observations

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Plant Species Observations

Scientific Name	Common Name
EUDICOTS	
Anacardiaceae – Sumac or Cashew Family	
* <i>Schinus terebinthifolius</i>	Brazilian pepper tree
Apocynaceae – Dogbane Family	
* <i>Carissa macrocarpa</i>	Natal plum
* <i>Nerium oleander</i>	Oleander
Araliaceae – Ginseng Family	
* <i>Hedera helix</i>	English ivy
Asteraceae – Sunflower Family	
* <i>Dittrichia graveolens</i>	Stinkwort
Apocynaceae – Dogbane Family	
Bignoniaceae – Bigonia Family	
* <i>Dolichandra unguis-cati</i>	Cat's claw creeper
Cupressaceae – Cypress Family	
* <i>Cupressus sempervirens</i>	Mediterranean cypress
Fabaceae – Legume Family	
* <i>Acacia</i> sp.	Acacia
Lamiaceae – Mint Family	
* <i>Salvia Rosmarinus</i>	Rosemary
Malvaceae – Mallow Family	
* <i>Hibiscus</i>	Hibiscus
Myrtaceae – Myrtle Family	
* <i>Melaleuca nesophila</i>	Showy honey-myrtle
GYMNOSPERMS	
Pinaceae – Pine Family	
<i>Pinus</i> sp.	Pine
Podocarpaceae – Yellow-wood Family	
* <i>Afrocarpus falcatus</i>	African pine tree

Scientific Name	Common Name
MONOCOTS	
Asparagaceae – Asparagus Family	
* <i>Agave attenuata</i>	Foxtail agave
Amaryllidaceae – Amaryllis Family	
* <i>Tulbaghia violacea</i>	Society garlic
Araceae – Arum Family	
* <i>Phoenix roebelenii</i>	Dwarf date palm
* <i>Thaumatococcus danianus</i>	Split-leaf philodendron
Ashpodelaceae – Asphodel Family	
* <i>Aloe</i> sp.	Aloe species
Iridaceae- Iris Family	
* <i>Iris grandiflora</i>	African iris
Poaceae – Grass Family	
<i>Poa annua</i>	Annual meadow grass
Strelitziaceae – Bird of Paradise Family	
* <i>Strelitzia reginae</i>	White bird of paradise
Cactaceae – Cactus Family	
* <i>Opuntia ficus-indica</i>	Mission prickly pear
Crassulaceae – Stonecrop Family	
* <i>Aeonium arboreum</i> var. <i>arboreum</i>	Canary Island Aeonium
Euphorbiaceae – Spurge Family	
* <i>Euphorbia maculata</i>	Spotted spurge
Myrtaceae – Myrtle Family	
* <i>Eucalyptus</i> sp.	Gum
* <i>Myrtus</i> sp.	Myrtle tree
Nyctaginaceae – Four O'clock Family	
<i>Bougainvillea</i> sp.	Bougainvillea
Portulacaceae – Purslane Family	
* <i>Portulaca oleracea</i>	Purslane
Solanaceae – Nightshade Family	
<i>Solanum</i> sp.	Nightshade
Verbenaceae – Vervain Family	
* <i>Lantana camara</i>	Lantana

Scientific Name	Common Name
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MONOCOTS

Agavaceae – Century Plant Family

* *Agave americana* American century plant

Areaceae – Palm Family

* *Syagrus romanzoffiana* Queen palm

* *Washingtonia robusta* Mexican fan palm

Legend

* = Non-native or invasive species

Attachment 3. Wildlife Species Observations

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Wildlife Species Observations

Scientific Name	Common Name
REPTILES	
<i>Sceloporus occidentalis longipes</i>	Great Basin Fence Lizard
BIRDS	
<i>Buteo jamaicensis</i>	Red-tailed Hawk
<i>Larus occidentalis</i>	Western Gull
<i>Corvus brachyrhynchos</i>	American Crow
<i>Corvus corax</i>	Common Raven
<i>Euphagus cyanocephalus</i>	Brewer's Blackbird
MAMMALS	
<i>Thomomys bottae</i>	Botta's Pocket Gopher
<i>Canis familiaris</i>	Domestic Dog

