



Campus Point Project

Biological Letter Report

prepared for

LPA Design Studios

Eric Jones, Managing Director
1600 National Avenue
San Diego, California 92113

prepared by

Rincon Consultants, Inc.

2215 Faraday Ave, Suite A
Carlsbad, California 92008

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2019 *Biological Letter Report Campus Point Project, San Diego, California.* Rincon
Consultants Project No. 19-08066.

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Executive Summary

This general biological letter report documents the findings of a biological survey conducted by Rincon Consultants, Inc. (Rincon) for the Campus Point Project located in the City of San Diego (City), California. The 84.84-acre project site is located within the University Community Plan (UCP) area in the northwestern portion of the City. The UCP area encompasses approximately 8,500 acres and is generally bounded by Los Peñasquitos Lagoon and Torrey Pines on the north, Interstate 805 (I-805) and Mira Mesa on the east, State Route 52 (SR-52) on the south, and La Jolla and the Pacific Ocean on the west (Figure 1). The proposed project consists of expanding an existing 731,725-square-foot scientific research and development facility by 328,383 square feet; thereby creating a 1,060,108-square-foot science and business park, characterized by a campus-like environment with comprehensive site design and substantial landscaping. The project would add two new buildings and involves the redevelopment of the existing scientific research and development property with additional buildings and accessory uses. The project would also add a parking structure within an area that is currently surface parking.

The project site is currently used for industrial/scientific research and development space for University of California, San Diego. The northern portion of the project site occupies approximately 42 acres and includes the existing 463,791-square-foot Campus Point (formerly IVAC) building. The southern portion of the project site occupies approximately 17 acres and includes an approximately 267,934-square-foot building that houses primarily scientific research and development uses. The remainder of the developed portion of the project site is primarily surface parking and landscaping. Land on the north, west, and east sides of the project site slopes downward and consists of sensitive biological resources and steep slopes. The project site is located on a mesa. Although the perimeter of the project site has slopes up to 130 feet tall, the core of the site is relatively flat. The site has a maximum elevation of approximately 302 feet above mean sea level (AMSL).

The project site is located within the boundaries of the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan, partly within a Multi-Habitat Planning Area (MHPA), but not within the Coastal Overlay Zone. One MSCP sensitive species, Cooper's hawk, was observed flying over the project site during the field survey. Due to the moderate to high potential of Cooper's hawk occurrences, if construction occurs in or near the MHPA within the breeding season (February 1 to August 31), an avoidance area of 300 feet from any Cooper's hawk nest that occurs within the MHPA would be required. If site preparation and construction activities are initiated during the breeding season, a pre-construction nesting bird survey will be conducted by a qualified biologist no more than 3 days prior to initial ground disturbance or vegetation removal to determine the presence/absence, location, and status of any active nests.

No City defined wetlands occur within the project impact area or have the potential to be impacted by project activities, therefore no mitigation is required. The grading limits area (Figure 4) does not provide suitable habitat to support special-status plant or wildlife species and has minimal function or value as sensitive habitat. Two Tier II sensitive vegetation communities (disturbed and intact Diegan coastal sage scrub) occur on site, however, these habitats are outside of the grading limits. The project is not expected to result in any significant impacts to special-status plant or wildlife species, including MSCP covered species and narrow endemic species.

1 Introduction

This report provides information pertaining to the existing biological resources observed by Rincon Consultants Inc. (Rincon) for the Campus Point Project located within the City of San Diego (City). The purpose of this report is to document the existing conditions of the project site and to evaluate the potential for impacts to biological resources, facilitating the City's environmental review of the project during the California Environmental Quality Act (CEQA) process.

1.1 Project Location

The project site is located on the University of California, San Diego campus, within the City of San Diego, San Diego County. The 84.84-acre project site is located within the University Community Plan (UCP) area in the northwestern portion of the City. The UCP area encompasses approximately 8,500 acres and is generally bounded by Los Peñasquitos Lagoon and Torrey Pines on the north, Interstate 805 (I-805) and Mira Mesa on the east, State Route 52 (SR-52) on the south, and La Jolla and the Pacific Ocean on the west (Figure 1).

The project site is situated between Interstate 5 (I-5) and I-805, approximately 0.5 mile south of where the two freeways converge (see Figure 2-1), on a private driveway at 10290 and 10300 Campus Point Drive (Assessor's Parcel Numbers 343-230-13 and 343-230-14). The project site is in the unsectioned Pueblo Lands of San Diego land grant of the U.S. Geological Survey (USGS) 7.5-minute topographic map, Del Mar quadrangle. The project site is bound on the north by undeveloped land, on the west by a steep hillside adjacent to I-5, on the east by vacant land, and on the south by industrial development (Figure 2).

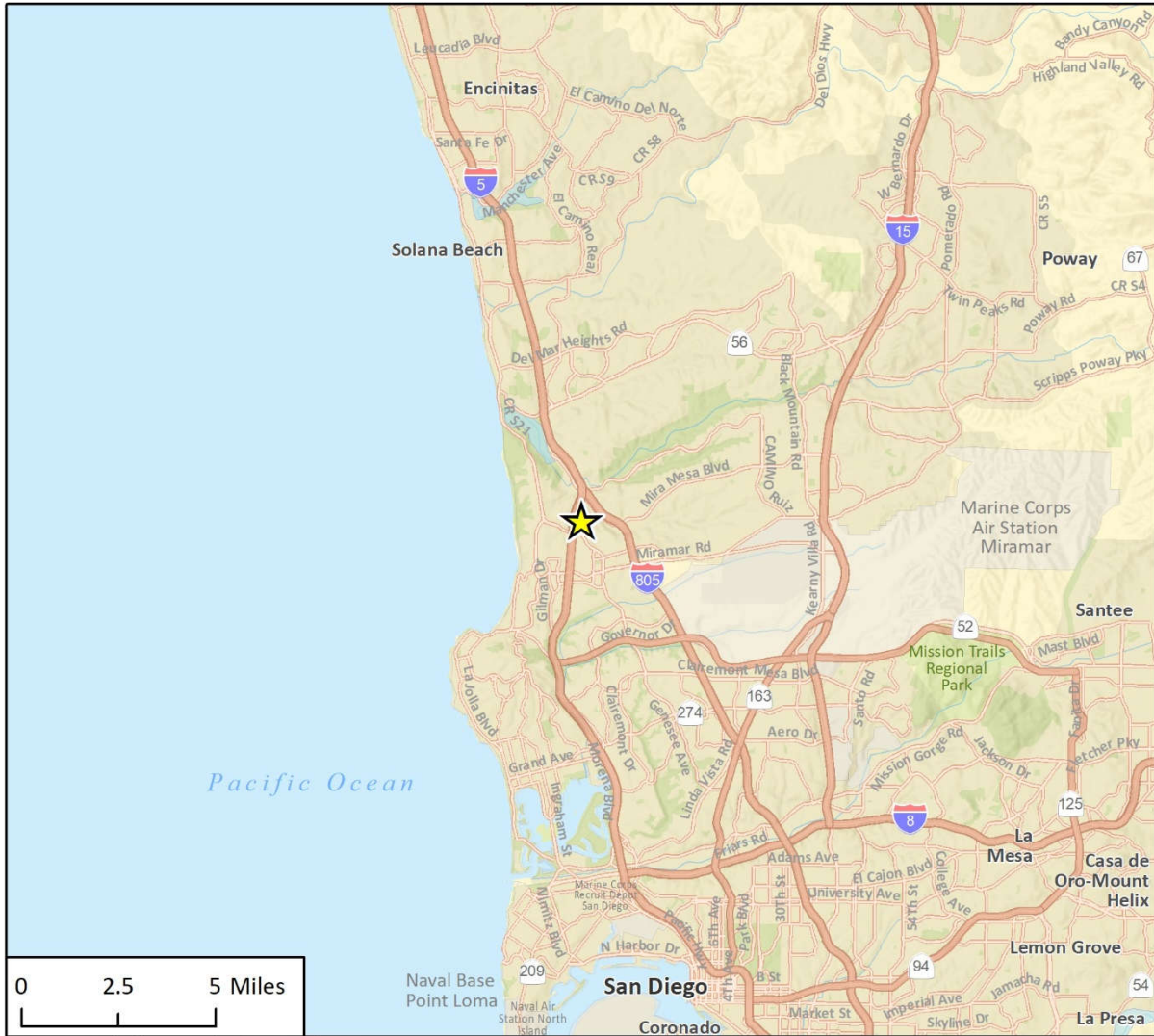
The project is within the University Community Plan area and is located within the boundaries of the City's Multiple Species Conservation Program (MSCP) Subarea Plan and is partly within a Multi-Habitat Planning Area (MHPA, Figure 3) (SANDAG, 2019). However, for this project the construction work is being done to the south and west, away from the MHPA. The site is not within the Coastal Overlay Zone.

1.2 Project Description

The proposed project consists of:

- 1) Providing the region with additional job opportunities in the life science and biotech industries.
- 2) Intensifying existing industrial/research uses in a manner that provides a campus-like environment with comprehensive site design and substantial landscaping.
- 3) Enhancing the access, orientation, and walkability of the existing site.
- 4) Using the site in a way that would contribute to regional goals to reduce vehicle use and promote alternative transportation use by providing a facility within a convenient distance of present and future alternative transportation facilities.
- 5) Creating a coherent and cohesive building and site design that is compatible in scale and character and enhances the existing community character in the University Community Plan (UCP).

Figure 1 Regional Location



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★ Project Location

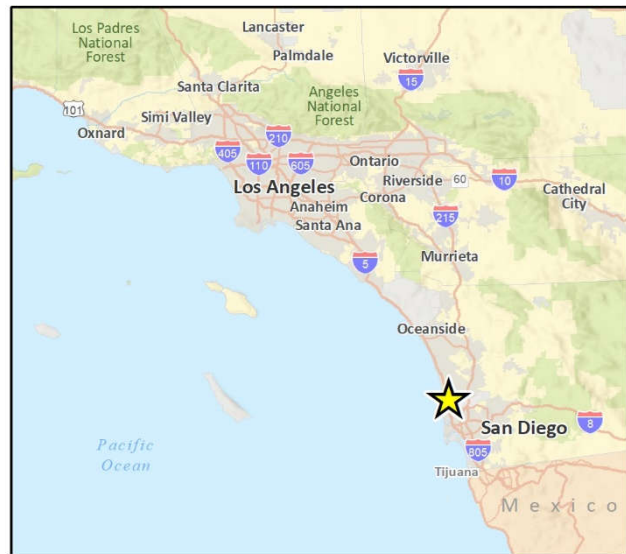
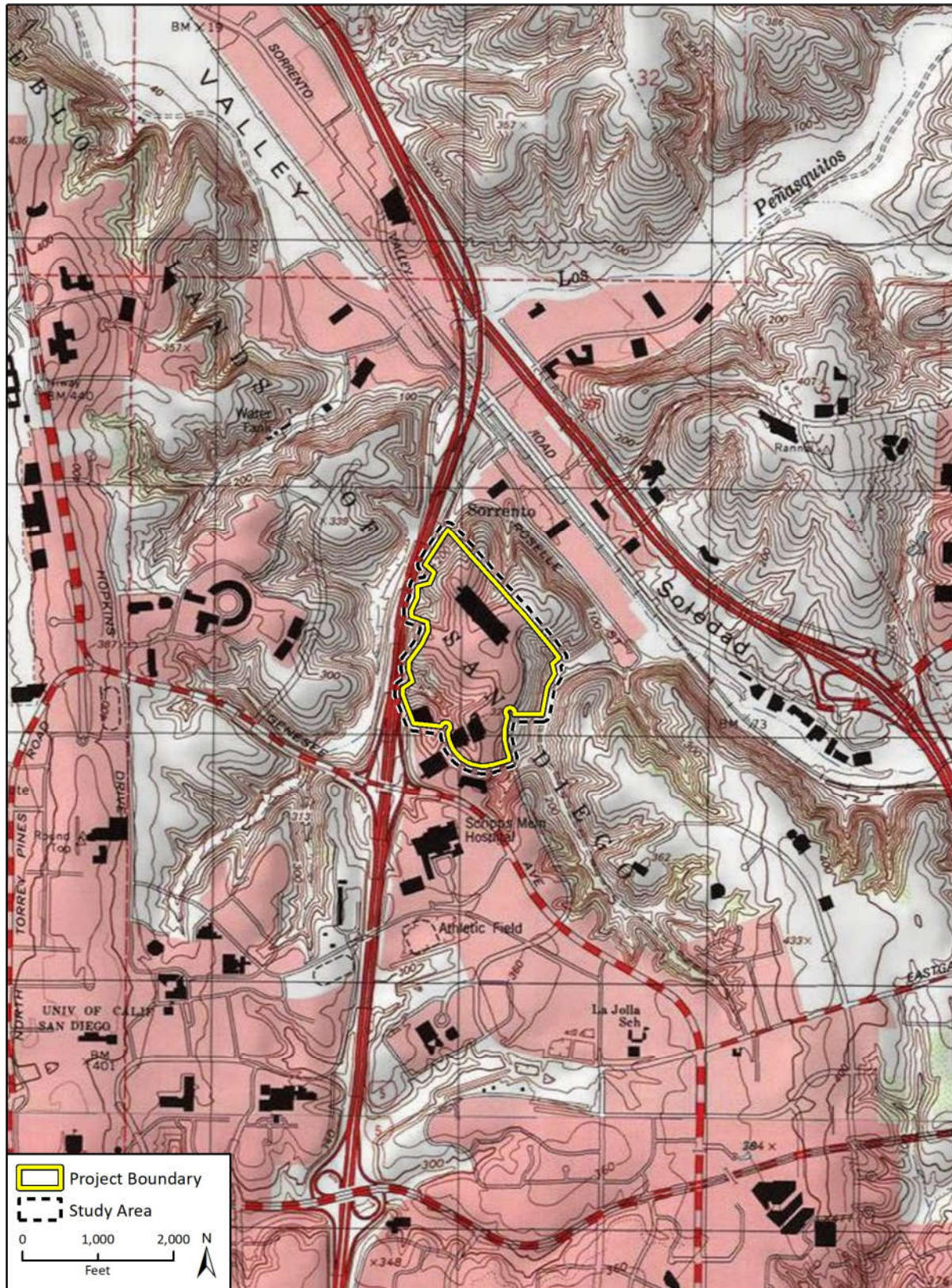


Fig. 1 Regional Location

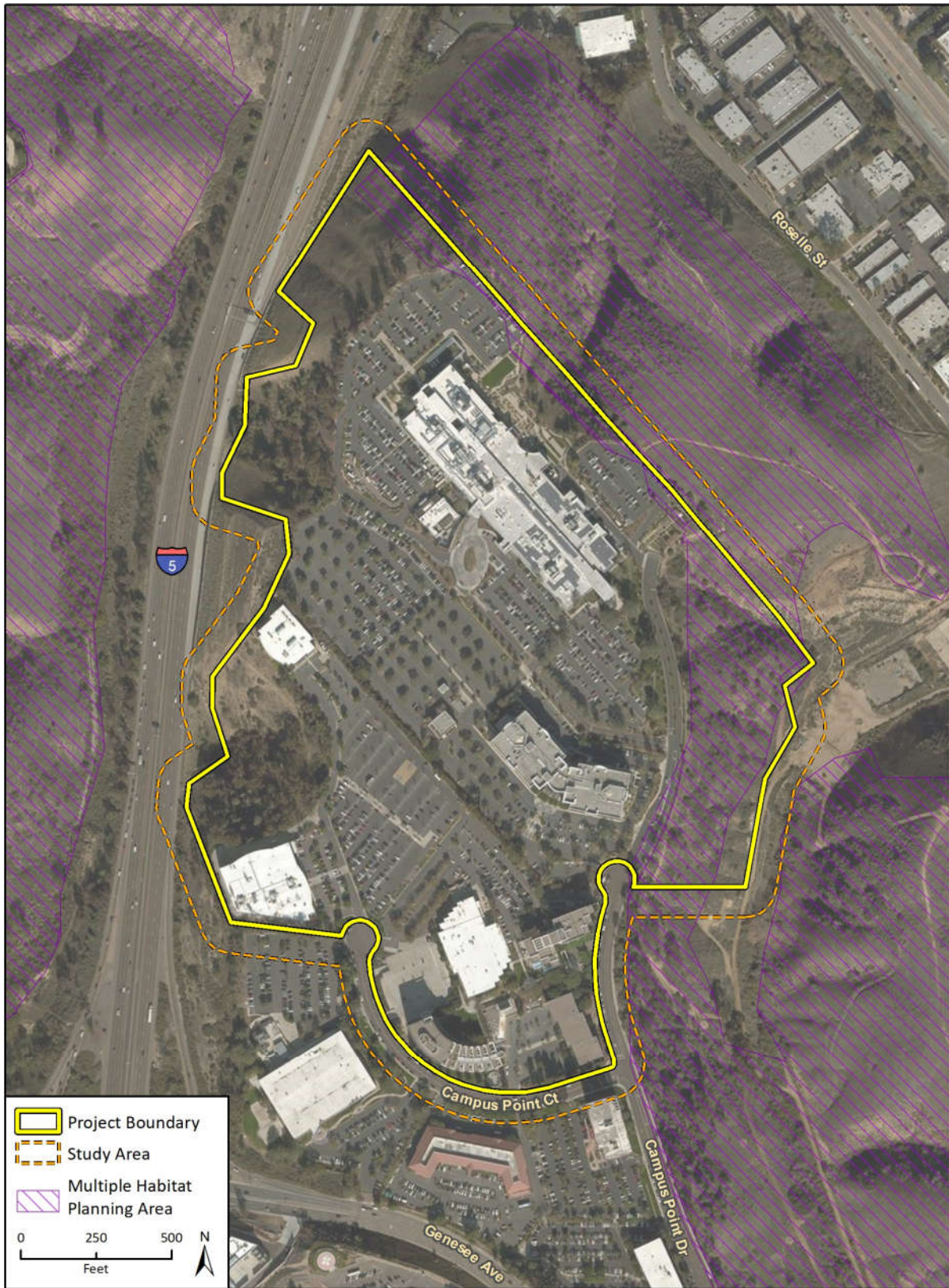
Figure 2 Project Site



Imagery provided by National Geographic Society and its licensors © 2019.

Fig. 2 Project Location

Figure 3 City of San Diego Multiple Habitat Planning Areas



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Fig 3 Multiple Habitat Planning Areas

The proposed project entails intensifying an existing 731,725-square-foot scientific research and development facility by 328,383 square feet; thereby creating a 1,060,108-square-foot science and business park, characterized by a campus-like environment with comprehensive site design and substantial landscaping. The project would add two new buildings and involves the redevelopment of the existing scientific research and development property with additional buildings and accessory uses. The project would entail the construction of a 12- and 6-story split-level multi-tenant building (CP3) and a 2-story building housing a micro-brewery with accessory dining space and shared tenant amenity spaces (CP4) within the 84.84-acre project site. The total floor area of the site would not exceed 1,060,108 square feet (including the existing 731,725 square footage for buildings CP1 and CP2). A majority of the proposed structures and improvements would be constructed in the southwest quadrant of the project site in the location of existing surface parking. The proposed CP3 research and development building would be located at the southwestern end of the property. The 2-story CP4 amenity structure would be located just east of the proposed building CP3 in the southwestern portion of the site.

The buildings have been designed to achieve Leadership in Energy and Environmental Design (LEED) Silver, which requires several energy- and insulation-efficiency measures to be included in the design of the structures. The main 12- and 6-story split-level building (CP3) would contain 318,383 square feet of scientific research and development space, including a 44,000-square-foot below-grade basement level and a top floor penthouse. Building CP3 would be 195 feet tall (including the mechanical screening). Exterior treatments include a combination of aluminum and glass precast concrete and terracotta.

No development is proposed for the northern portion of the site, with the exception of improvements to the trash/recycle area north of building CP1. All improvements would be located within existing developed areas (south and west areas), within the existing parking lot boundary. No development is proposed on any of the steep slopes surrounding the developed portion of the site.

1.2.1 Parking Lot Improvements

The project would add a parking structure within previously disturbed land that is currently occupied by surface parking. There are currently 2,574 surface parking spaces on site. A total of 2,909 parking spaces are proposed based upon a parking ratio of 2.74 spaces per 1,000 square feet. This includes 1,448 existing stalls that would remain, 7 new surface stalls, and 1,440 stalls that would be provided in a 9-level parking structure (6 levels above ground, 3 below ground) within the 84.84-acre project site. The height of the parking structure would be 51 feet, 11 inches above grade. The parking garage would be located at the southern end of the project site, just south and east of proposed building CP4.

Surface parking areas located in the southeastern portion of the site and north of building CP3 would be reconfigured to accommodate proposed internal circulation improvements.

The project also includes a loading dock/utility area, landscaping, and site improvements. A new loading dock/utility area and trash/recycle area would be located south of building CP3. Minor improvements to the trash enclosure area would also be completed in the northern portion of the site, north of the existing building CP1.

2 Methodology

Biological conditions within the project site were evaluated by confirming applicable biological regulations, policies, and standards; reviewing biological literature pertinent to the site and vicinity; and conducting a reconnaissance-level biological survey of the site. The methods employed are described in detail below. The findings and opinions conveyed in this report are based on this methodology, therefore all quantitative impact assumption are estimates.

2.1 Literature Review

Prior to the field survey, Rincon conducted a literature review to better characterize the nature and extent of biological resources on and adjacent to the site. The literature review included an evaluation of current and historical aerial photographs of the site (Google Earth 2019), regional and site-specific topographic maps (*Del Mar, California* USGS 7.5-minute topographic quadrangle), geologic maps, climatic data, and other available background information.

The SanBIOS database 2019 was reviewed to determine areas designated as MHPA for the MSCP Subarea Plan. The National Wetlands Inventory (NWI) wetlands mapper (<https://www.fws.gov/wetlands/Data/Mapper.html>), historic aerial imagery and topographic maps (<https://www.historicaerials.com>), and the National Hydrography Dataset (USGS 2016) were reviewed to determine if any wetland and/or non- wetland waters had been previously documented and mapped on or in the vicinity of the project site.

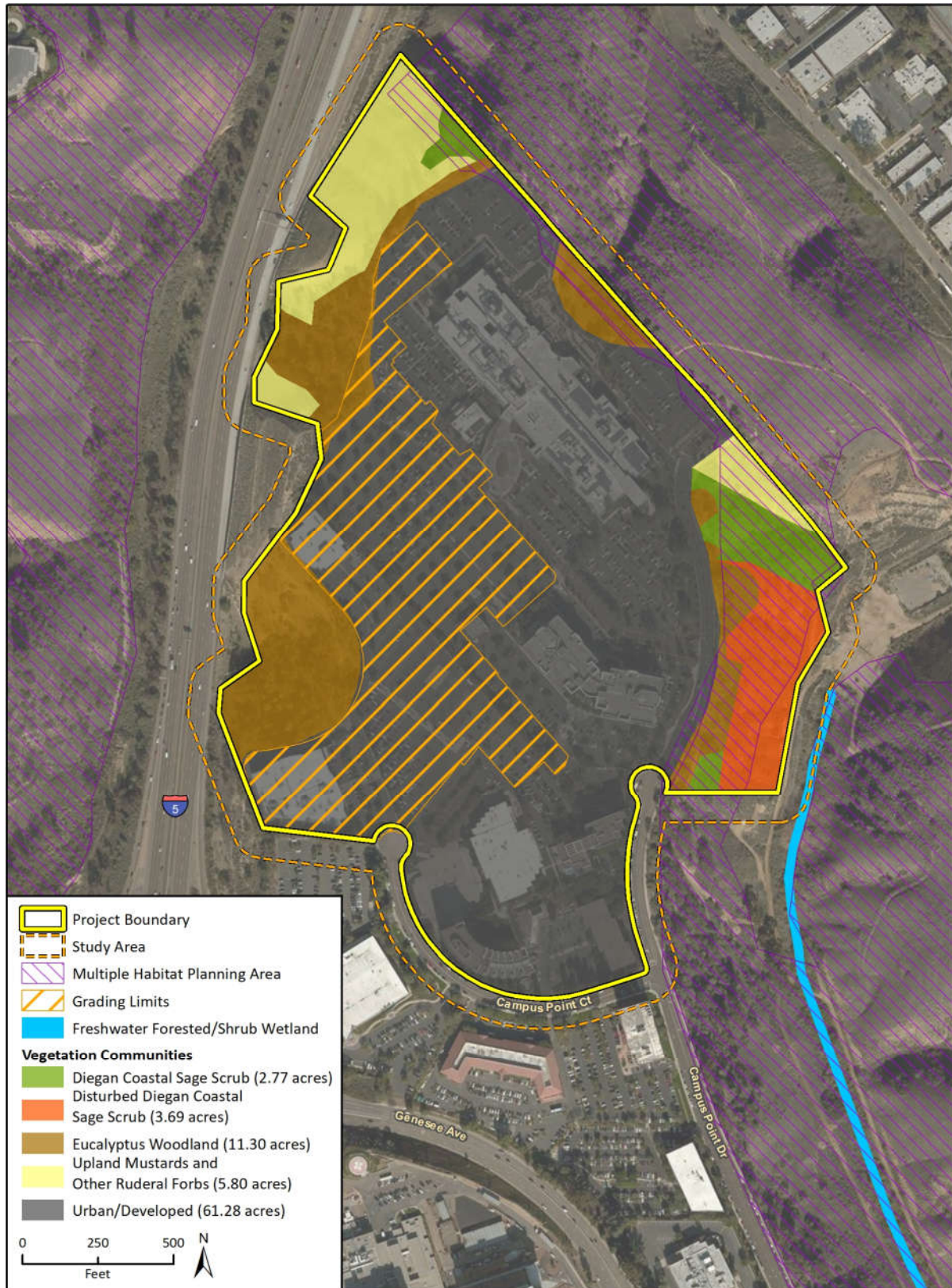
The California Natural Diversity Data Base (CNDDDB), Biogeographic Information and Observation System (BIOS – <http://www.bios.dfg.ca.gov>), the USFWS Critical Habitat Portal (<http://criticalhabitat.fws.gov>), and SanGIS/ SanBIOS (<http://www.sangis.org/>) were also reviewed to determine if any special-status wildlife, plant or vegetation communities were previously recorded on site.

Other resources included the California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (September 2019), CDFW Special Animals List (September 2019), CDFW Special Vascular Plants, Bryophytes, and Lichens List (September 2019), The Jepson Manual: Vascular Plants of California (Baldwin et al. 2012), Calflora (2019), CDFW Habitat Classification Rules California Wildlife Habitat Relationships System (CWHR) (2005), and the City of San Diego Land Development Code, Land Development Manual and Biology Guidelines (Guidelines), and Environmentally Sensitive Land regulations, and amendments (City of San Diego 2012).

2.2 Field Reconnaissance Survey

The field reconnaissance survey was limited to providing an overview of site biological constraints and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, protected trees, wildlife movement, and habitat for nesting birds. The study area consisted of the approximate 84.84-acre project site and a 100-foot buffer.

Figure 4 Biological Resources Map



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Fig. 5 Biological Resources Map

On August 22, 2019, between the hours of 0800-1100, Rincon Biologist Brooke Pickett and Senior Biologist Jared Reed conducted a general biological survey. The survey area included the parcels mentioned above in Section 2.1 and a 100-foot buffer. The surveys were performed by walking the proposed work site to characterize the existing biological resources present (e.g., vegetation communities, potential presence of sensitive species and/or habitats, and presence of potentially jurisdictional waters). Where portions of the study area were inaccessible on foot (e.g., steep slopes), the biologists visually inspected these areas with binoculars (10 x 42). Weather conditions during the survey included an average temperature of 70 degrees Fahrenheit, with winds between 2 and 4 miles per hour and partially cloudy skies.

During the survey, an inventory of all plant and animal species observed was compiled (Attachment A). Plant species nomenclature and taxonomy follows The Jepson Manual: Vascular Plants of California, Second Edition (Baldwin et al., 2012), and the Jepson Online Interchange for California Floristics (Jepson Flora Project, 2019). All species encountered were noted and identified to the lowest possible taxonomic level.

The habitat requirements for each regionally occurring special-status species were assessed and compared to the type and quality of the habitats observed within the study area during the site visit. The survey was conducted to make an initial determination regarding the presence or absence of terrestrial biological resources including plants, birds and wildlife.

Based on the results of the site visit, literature review, and species known to occur regionally, Rincon biologists assessed the potential for the proposed project to impact special-status species within the study area. The potential presence of special-status species is based on the site visit and literature review and is intended to assess habitat suitability within the study area only. Definitive surveys to confirm the presence or absence of special-status species were not performed and are not included within this analysis. The findings and opinions conveyed in this report are based on the methodology described above.

2.2.1 Biological Resource Mapping

Biological resources observed on site were mapped on a site-specific aerial photograph at a scale of one-inch-equals-2000-feet. All accessible portions of the study area were covered on foot. Inaccessible areas were mapped using binoculars and aerial photography interpretation. Vegetation classification was based on the classification systems provided in the *Draft Vegetation Communities of San Diego County* (Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge [March 2008] [Draft]); and modified as appropriate to reflect the existing site conditions. Upland vegetation communities are divided into four tiers of biological sensitivity based on rarity and ecological importance. Tier I represents the most sensitive vegetation communities while Tier IV represents the least sensitive vegetation community. The Tier system is applied as an indication of habitat sensitivity pursuant to the Guidelines.

2.2.2 Flora

All plant species observed on the property were noted, and plants that could not be identified in the field were identified later using taxonomic keys. Vegetation classification was based on the classification systems provided in the *Draft Vegetation Communities of San Diego County* (Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge [March 2008] [Draft]).

2.2.3 Fauna

Animal species observed directly or detected from calls, tracks, scat, nests, or other sign were documented. Zoological nomenclature for birds is in accordance with the American Ornithologists' Union Checklist (2016); for mammals, Wilson & DeeAnn M. Reeder (2005). The detection of wildlife species was limited by seasonal and temporal factors. The biological survey was conducted during summer; therefore, potentially occurring spring or fall migrants may not have been observed. As the survey was performed during the day, identification of nocturnal animals was limited to sign if present on site.

2.2.4 Survey Limitations

The original reconnaissance-level survey was conducted during the summer season. Many residual annual plants were withered and dead and some perennial species were dormant.

The potential presence of special-status species is also informed by a literature review and a general biological field survey to assess habitat suitability.

3 Regulatory Overview

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

3.1 Federal and State Environmental Statutes

For the purpose of this report, the following statutes are applicable:

- **California Environmental Quality Act (CEQA).** Requires environmental review prior to approval of discretionary projects, and requires significant impacts to be mitigated if feasible.
- **Endangered Species Act (ESA) and California Endangered Species Act (CESA).** These laws prohibit the unauthorized take of federally and state-listed threatened and endangered species.
- **Clean Water Act (CWA) and Porter-Cologne Water Quality Control Act.** These laws prohibit unauthorized discharges of pollutants, including fill material for construction, into jurisdictional waters of the United States and waters of the State.
- **California Fish and Game Code (CFG) Sections 1600 and 3503 et seq.** These sections of the CFG set forth the Lake/ Streambed Alteration Agreement program, through which the California Department of Fish and Wildlife (CDFW) regulates activities that would divert, obstruct, or alter streambeds.
- **Migratory Bird Treaty Act (MBTA).** Under the provisions of the Migratory Bird Treaty Act of 1918 (MBTA), it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by the USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest, or egg of any migratory bird covered by the

conventions, or to attempt those activities. It is anticipated that the project will comply with the provisions of the MBTA.

- **CFGC Section 3503.** The California Fish and Game Code (CFGC) provides similar protection (Section 3513) and extends additional protection to any birds in the orders Falconiformes and Strigiformes (raptors or birds-of-prey) (CFGC Section 3503.5). It is anticipated that the project will comply with CDFC Section 3503.

3.2 Guidelines for Determining CEQA Significance

The following threshold criteria, as defined by the CEQA Guidelines Initial Study Checklist, were used to evaluate potential environmental effects. Based on these criteria, the proposed project would have a significant effect on biological resources if it would:

- a) Would the project result in 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 or other local or regional plans, policies or regulations, or by the CDFW or USFWS?
- b) Have a substantial adverse impact on any riparian habitat, Tier I habitat, Tier II habitat, Tier IIIA habitat or Tier IIIB habitat or other sensitive natural community as identified in the Biology Guidelines of the Land Development Manual or in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc....) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites
- e) 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 plan area or the surrounding region
- f) Introduce land use in an area adjacent to the MHPA that would result in adverse edge effects
- g) Conflict with any local policies or ordinances protecting biological resources.
- h) Result in an introduction of invasive species of plants in a natural open space area.

3.3 Local Regulations

3.3.1 The Multiple Species Conservation Program/Multiple Habitat Planning Area

The site is located within the boundaries of the City of San Diego's MSCP Subarea Plan and is partly within a MHPA. The site is not inside the Coastal Zone. The MSCP is a comprehensive habitat conservation planning program for San Diego County. Goals of the MSCP include preserving a network of habitat and open space to protect biodiversity, and conserving viable populations of sensitive species and regional biodiversity while allowing for reasonable economic growth. The City implements portions of the MSCP through subarea plans, which describe specific implementing mechanisms such as the MHPA pursuant to Section 10(a) of the Federal ESA and the Natural

Community Conservation Program (NCCP) plan pursuant to the California NCCP Act of 1991 and the California ESA.

3.3.2 City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the Environmentally Sensitive Lands (ESL) Regulations is to “protect, preserve, and, where damaged restore, the *environmentally sensitive lands* of San Diego and the viability of the species supported by those lands.” A few purposes of these regulations is to ensure that development occurs in such a way that protects the overall quality of the resources and the natural and topographic character of the area and retains biodiversity and interconnected habitats. Specific development regulations pertaining to sensitive biological resources exist in the City’s Municipal Code in both the Environmentally Sensitive Lands Regulations (Chapter 14, Division 1, Section 143.0141) and the OR-1-2 Zone (Chapter 13, Division 2, Section 131.0230).

The ESL defines sensitive biological resources as lands included within the MHPA as identified in the City’s MSCP Subarea Plan and other lands outside the MHPA that contain wetlands; Tier I, II, IIIA, or IIIB vegetation communities; habitat for rare, endangered, or threatened species; or narrow endemic species. Impacts to sensitive biological resources are addressed in this report and any mitigation required must follow Section III of the Guidelines.

4 Environmental Setting

4.1 Topography and Soils

The project site is currently used for industrial/scientific research and development space. The northern portion of the project site occupies approximately 42 acres and includes the existing 463,791-square-foot Campus Point (formerly IVAC) building. The southern portion of the project site occupies approximately 17 acres and includes an approximately 267,934-square-foot building that houses primarily scientific research and development uses. The remainder of the developed portion of the project site is primarily surface parking and landscaping. Land on the north, west, and east sides of the project site slopes downward and consist of sensitive biological resources and steep slopes.

The project site is located on a mesa. Although the perimeter of the project site has slopes up to 130 feet tall, the core of the site is relatively flat. The site has a maximum elevation of approximately 302 feet above mean sea level (AMSL). The lowest part of the graded area is at the southwest boundary of the site at around 295 feet AMSL. The mesa falls off steeply on the northwest, northeast, east, and south. The developed portion of the project site contains slopes of 0 to 15 percent grade.

The study area historically contained three soil types: Altamont clay, 30 to 50 percent slopes; Chesterton fine sandy loam, 5 to 9 percent slopes; and Corralitos loamy sand, 0 to 5 percent slopes (USDA, 2019). These consist of very deep, moderately well to well drained soils formed from sandstone (California Soil Resource Lab 2019).

4.2 Vegetation Communities

Five vegetation communities occur within the study area: Diegan Coastal Sage Scrub, Disturbed Diegan Coastal Sage Scrub, Upland Mustards and Other Ruderal Forbs, Eucalyptus Woodland, and Urban/Developed (Figure 4; Table 1). Refer to Appendix A for the complete list of plant species observed. Refer to Appendix C for photographs of the project site.

Table 1 Vegetation Community/Land Cover Type

Tier	Vegetation Community/Land Cover Type by Holland (Holland Code)	Acreage Within Project Site
II	Diegan Coastal Sage Scrub (32500)	2.77
II	Disturbed Diegan Coastal Sage Scrub (32520)	3.69
IV	Upland Mustards and Other Ruderal Forbs (42011)	5.80
IV	Eucalyptus Woodland (79100)	11.30
IV	Urban/Developed (12000)	61.28
Total		84.84

Diegan Coastal Sage Scrub within the study area was comprised of a variety of native species, such as sugar bush (*Rhus ovata*), black sage (*Salvia mellifera*), California buckwheat (*Eriogonum fasciculatum*), toyon (*Heteromeles arbutifolia*), and California sage brush (*Artemisia californica*). Urban/developed areas on site are primarily comprised of paved parking lots with planters of ornamental vegetation. A total of 77 plant species were observed within the study area during the site reconnaissance surveys (Attachment A). The five vegetation communities present on site are discussed in more detail below.

4.2.1 Diegan Coastal Sage Scrub (32500)

Diegan Coastal Sage Scrub is considered a Tier II “uncommon” vegetation according to the Guidelines. Mitigation for direct impacts to Tier II communities is required by the Development Services Department Environmental Review Manager (ERM) through preservation of upland habitats in conformance with the City’s Biology Guidelines, MSCP, and ESL Regulations.

This community is dominated by low, soft-woody subshrubs that are most active in winter and early spring. Many taxa are facultatively drought-deciduous and typically grow in low moisture-availability sites, such as steep, xeric slopes or clay-rich soils that are slow to release stored water. Dominant plant species in Diegan Coastal Sage Scrub usually include California sage brush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*), chaparral mallow (*Malacothamnus fasciculatus*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), and black sage (Oberbauer et al. 2008). Diegan Coastal Sage Scrub is considered a sensitive community by the City, falling under the Habitat Group C.

Diegan Coastal Sage Scrub is found in a small northern patch and in small patches along the eastern side of the study area. The community is not dominated by one specific species, but consists of a variety of native species, such as sugar bush, black sage, California buckwheat, toyon, and sage brush.

4.2.2 Disturbed Diegan Coastal Sage Scrub (32520)

Disturbed DCSS is considered a Tier II “uncommon” vegetation according to the Guidelines. Mitigation for direct impacts to Tier II communities is required by the Development Services Department Environmental Review Manager (ERM) through preservation of upland habitats in conformance with the City’s Biology Guidelines, MSCP, and ESL Regulations.

Disturbed DCSS is found along the eastern side of the study area. The most abundant native species scattered in the Disturbed DCSS include black sage, laurel sumac, coyote brush (*Baccharis pilularis*), and California sage brush. Non-native plant species that are adapted to disturbances have become established, including pampas grass (*Cortaderia selloana*), red brome (*Bromus rubens*), tree tobacco (*Nicotiana glauca*), and Russian thistle (*Salsola tragus*).

4.2.3 Upland Mustards and Other Ruderal Forbs (42011)

This vegetation community is considered a Tier IV “other” vegetation type by the City Guidelines. No mitigation is required for direct impacts to this community type.

This community is typically dominated by black mustard (*Brassica nigra*), common mustard (*Brassica rapa*), cardoon (*Cynara cardunculus*), Geraldton carnation weed (*Euphorbia terracina*), mustard (*Hirschfeldia incana*), Dyers woad (*Isatis tinctoria*), or jointed charlock (*Raphanus sativus*) in the herbaceous layer, with emergent trees and shrubs present at low cover. This alliance usually occurs in fallow fields, grasslands, roadsides, levee slopes, disturbed coastal scrub, riparian areas, cleared roadsides, and waste places.

In the study area, this community is present in the northwest and northeast. The herbaceous layer is open to continuous. Black mustard is dominant and co-occurs with other non-native plants, such as asthma weed (*Euphorbia hirta*) and spotted spurge (*Euphorbia maculata*), at over 80% relative cover in the herbaceous layer.

4.2.4 Eucalyptus Woodland (79100)

This vegetation community is considered a Tier IV “other” vegetation type by the City Guidelines. No mitigation is required for direct impacts to this community type.

Eucalyptus woodlands can range from single-species thickets with little or no shrubby understory to scattered trees over a well-developed herbaceous and shrubby understory. These habitats are often dense strands with a closed canopy and produce a large amount of leaf and bark litter which limits the ability of other species to grow within the understory resulting in a decrease of floristic diversity. Characteristic species are the gum tree (*Eucalyptus* sp.), with the most common species consisting of blue gum (*Eucalyptus globulus*) and red gum (*Eucalyptus camaldulensis*).

Approximately 11.3 acres of eucalyptus woodland occurs throughout the study area. These areas consist almost entirely of red gum, with co-occurring Mexican fan palm (*Washingtonia robusta*), blackwood acacia (*Acacia melanoxylon*), silver wattle (*Acacia dealbata*), small Philippine acacia (*Acacia confusa*), and Monterey pine (*Pinus radiata*).

4.2.5 Urban/Developed (12000)

This vegetation community is considered a Tier IV “other” vegetation type by the City Guidelines. No mitigation is required for direct impacts to this community type.

Developed land includes areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. It is characterized by paved roads, hardscape, and landscaped areas. Characteristic species are usually ornamental or non-native species.

Most of the study area consists of urban/developed landscape (~61.28 acres). These areas include species such as century plant (*Agave Americana*), honeylocust (*Gleditsia triacanthos*), and song of India (*Dracaena reflexa*), among various other planted native and ornamental species (Appendix A).

4.3 Common Wildlife

The study area supports common wildlife adapted to urban and suburban areas (e.g., coyote [*Canis latrans*], western fence lizard [*Sceloporus occidentalis*], and a variety of common avian species. Wildlife species observed directly or detected from calls, tracks, scat, nests, or other signs were documented. The detection of wildlife species was limited by seasonal and temporal factors. Given the project site's history of disturbance and lack of connectivity with larger expanses of natural habitat, it is unlikely that the site would support most special-status species. Some of the wildlife species detected within the study area include California towhee (*Melospiza crissalis*), Bewick's wren (*Thryomanes bewickii*), Cooper's hawk (*Accipiter cooperii*), and Anna's hummingbird (*Calypte anna*). Wildlife species observed during the survey are included in Appendix A.

5 Special-Status Biological Resources

The study area contains special-status biological resources, including sensitive vegetation communities and suitable habitat for nesting birds. This section discusses special-status biological resources observed within the project site, and evaluates the potential for the project site to support other sensitive resources.

Local, state, and federal agencies regulate special-status resources and require an assessment of their presence or potential presence to be conducted on site prior to the approval of any proposed development on a property. Assessments for the potential occurrence of special-status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDDB, species occurrence records from other sites in the vicinity of the study area, and previous reports for the study area. The potential for each special status species to occur in the study area was evaluated according to the following criteria:

- **Not Expected.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Low Potential.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.

- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species is observed on the site or has been recorded (e.g., CNDDDB, other reports) on the site recently (within the last 5 years).

For the purpose of this report, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and National Marine Fisheries Service (NMFS) under the ESA; those listed as Threatened, or Endangered by the CDFW under the California Endangered Species Act (CESA) or Native Plant Protection Act; those recognized as Species of Special Concern (SSC) by the CDFW; are covered species under the City of San Diego MSCP subarea plan; and/or narrow endemic (plant) species identified in the City of San Diego MSCP Subarea Plan and regulations and plants occurring on lists 1 and 2 of the CNPS California Rare Plant Rank (CRPR) system per the following definitions:

- List 1A = Plants presumed extinct in California;
- List 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat);
- List 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20-80% occurrences threatened);
- List 1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (<20% of occurrences threatened or no current threats known); and
- List 2 = Rare, threatened or endangered in California, but more common elsewhere.

In addition, special-status species are ranked globally (G) and subnationally (S) 1 through 5 based on NatureServe's (2010) methodologies:

- G1 or S1 - Critically Imperiled Globally or Subnationally (state)
- G2 or S2 - Imperiled Globally or Subnationally (state)
- G3 or S3 - Vulnerable to extirpation or extinction Globally or Subnationally (state)
- G4 or S4 - Apparently secure Globally or Subnationally (state)
- G5 or S5 - Secure Globally or Subnationally (state)
 - ? - Inexact Numeric Rank
 - T - Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
 - Q – Questionable taxonomy that may reduce conservation priority

Sensitive biological resources are defined by the City Municipal Code as:

- Lands that have been included in the MHPA as identified in the City of San Diego MSCP SubareaPlan (City of San Diego 1997)
- Wetlands (as defined by the Municipal Code, Section 113.0103) (City of San Diego 2017a)
- Lands outside the MHPA that contain Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the City Guidelines (City of San Diego 2012)
- Lands supporting species or subspecies listed as rare, endangered, or threatened

- Lands containing habitats with narrow endemic species as listed in the City (City of San Diego 2012)
- Lands containing habitats of covered species as listed in the City Guidelines (City of San Diego 2012)

Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Appendix B provides the complete list of all special-status resources tracked within the CNDDDB and SanBIOS within a one-mile radius of the project site.

5.1 Special-Status Plant Species

The CNDDDB and SanBIOS document seventy-six (76) special-status plant species as potentially occurring within a one-mile radius of the project site. No special-status plant species were observed within the project site during the field surveys.

The project site is located within the University of California, San Diego campus. Because of historic and existing disturbance from high levels of anthropogenic activities and structures (I-5, University of San Diego buildings, and residential developments), the study area is not suitable for most special-status plant species. However, several species (14) have a moderate or high potential to occur within 1 mile of the study area including: California adolphia (*Adolphia californica*), Lewis' evening-primrose (*Camissoniopsis lewisii*), Orcutt's spineflower (*Chorizanthe orcuttiana*), San Diego sand aster (*Corethrogyne filaginifolia* var. *incana*), snake cholla (*Cylindropuntia californica* var. *californica*), western dichondra (*Dichondra occidentalis*), variegated dudleya (*Dudleya variegata*), graceful tarplant (*Holocarpha virgata*), and decumbent goldenbush (*Isocoma menziesii*). These species all require coastal sage scrub habitat, however, most of the coastal sage scrub on site is disturbed and all construction work will be taking place in the south and west of the site, outside of the DCSS habitat (Figure 4). The prevalence of non-native species and the absence of these sensitive species during the survey, indicates these species may have a low potential to occur within the study area.

Certain elements of marginally suitable habitat for other plant species are present adjacent to the project impact area, although each species is limited to specific biotypes or soil types (e.g., volcanic, rocky, and/or heavy soils; upland scrub; etc.) which do not occur on site. Due to the historic and existing disturbed condition of the project site and that construction activities are confined to previously developed areas, the project impact area is not suitable for sensitive plant species.

5.2 Special-Status Wildlife Species

The CNDDDB and SanBIOS documents fourteen (14) special-status wildlife species as potentially occurring within a one-mile radius of the project site.

The project site is located within a highly developed/disturbed urban and suburban area. Because of historic and existing disturbance from high levels of anthropogenic activities, and the lack of specific coastal habitats or suitable substrates, the site is not suitable for most special-status wildlife species. One sensitive raptor species, Cooper's hawk (*Accipiter cooperii*; COHA) (a CDFW Watch List species and MSCP covered species) was observed flying over the site.

While common birds are not designated as special-status species, destruction of their eggs, nests, and nestlings is prohibited by federal and state law. Section 3503.5 of the CFGC specifically protects

birds of prey, and their nests and eggs against take, possession, or destruction. Section 3503 of the CFGC also incorporates restrictions imposed by the federal Migratory Bird Treaty Act (MBTA) with respect to migratory birds (which consists of most native bird species).

Trees and other vegetation on or adjacent to the project site could provide suitable nesting habitat for several common avian species.

5.3 Special-Status Vegetation Communities

Plant communities are also considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance.

The ESL defines sensitive biological resources as lands included within the MHPA as identified in the City's MSCP Subarea Plan and other lands outside the MHPA that contain wetlands; Tier I, II, IIIA, or IIIB vegetation communities; habitat for rare, endangered, or threatened species; or narrow endemic species. Impacts to sensitive biological resources are addressed in this report and any mitigation required must follow Section III of the Guidelines. Two Tier II vegetation communities (DCSS and disturbed DCSS) were observed within the study area.

5.4 Jurisdictional Waters and Wetlands

Any proposed development in areas identified as jurisdictional waters will be subject to the permit requirements of the United States Army Corps of Engineers (USACE), under Section 404 of the Clean Water Act (CWA), Regional Water Quality Control Board (RWQCB), under Section 401 of the CWA and Porter-Cologne Water Quality Act, and a Streambed Alteration Agreement (SAA) from CDFW pursuant to Section 1600 *et. seq.* of the CFGC. Wetlands are defined in the City's Environmentally Sensitive Lands Municipal Code as:

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
3. Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands; or
4. Areas mapped as wetlands on Map No. C713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

According to the National Wetlands Inventory (NWI) the northern portion of an unnamed wetland occurs within the study area to the east of the project site (Figure 4). The wetland contains riparian vegetation and is approximately 1030 m long and 27 m wide. Although NWI identified the feature as a freshwater emergent wetland, Rincon found that the feature lacks hydric soils (USDA 2019).

5.5 Wildlife Corridors

Wildlife movement corridors are linear features that connect larger patches of natural open space and provide habitat conditions for the movement of small and large animals (CBI 2003). They can serve as routes for dispersal and migration of animals, as well as the distribution of plants via wildlife vectors. In San Diego County, important corridors and linkages have been identified to provide connections between undeveloped lands, especially to significant public lands.

According to USFWS Critical Habitat portal CDFW BIOS, and the San Diego County General Plan (2011), the project site is located within a conservation planning linkage. A core linkage occurs to the north of the project site in undeveloped land. However, the study area is bordered on the west by I-5, to the south by Genesee Avenue, and to the east by Campus Point Drive. Additionally, the construction area in the north and south of the project site does not support habitat that would contribute substantially to allow for the function of any local or regional wildlife or corridor linkages.

The wetland (NWI 2019) could possibly be used as a local wildlife travel route for common species. However, the wetland would not be impacted as it is a significant distance from the grading limits (Figure 4). The project site is highly developed and the grading limits is almost entirely paved, therefore, it does not contain areas important for wildlife movement.

6 Impact Analysis and Recommended Actions

The City of San Diego's Significance Determination Guidelines under CEQA (Significance Determination Guidelines) require that direct impacts, indirect impacts, and cumulative impacts of a proposed project be analyzed for significance. Mitigation, monitoring, and reporting recommendations are provided in Section 7.0.

The proposed project would directly impact special-status vegetation communities.

6.1 Issue 1: Special-Status Species

The proposed project would have a significant effect on biological resources if it would:

- a) *Result in 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 or other local or regional plans, policies or regulations, or by the CDFW or USFWS?*

6.1.1 Special-Status Plant Species

The majority of special-status plant species do not have potential to occur on site. Additionally, no special-status plant species were observed in the survey area during the field survey. The project would result in direct impacts to existing non-native habitat to the south and west that is highly disturbed and generally unsuitable for special-status plant species. Given the project site's existing disturbances and habitat characteristics, including prior site development, limited habitat area, prevalence of non-native species, no special-status plant species are expected to occur in the

proposed impact areas. Therefore, the project is not anticipated to result in any significant impacts to special-status plant species, and no mitigation is recommended.

6.1.2 Special-Status Wildlife Species

The project site's existing level of disturbance in the south and west, including prior site development, limited habitat area, and prevalence of non-native species, substantially reduces the potential for special-status wildlife to occur. In addition, while the project site occurs within the conservation planning linkage, it is not within the MHPA and project impacts would be confined to previously disturbed areas within the existing campus footprint. Therefore, it would not be expected to support any permanent populations of special-status wildlife species.

One sensitive species, Cooper's hawk, was observed flying over the project site during the initial field survey. As previously mentioned, the Coopers hawk is an MSCP-covered species, and protected by the CFGC Sections 3503, 3503.3, (see Section 3 Regulatory Overview). Construction of the project has the potential to indirectly impact Cooper's hawk or other nesting birds protected under the CFGC and MBTA if completed during the avian nesting season. All construction work is being done to the south and west (Figure 4), away from the MHPA and is not anticipated to result in any significant impacts to special-status wildlife species. MHPA Adjacency guidelines would be followed if construction is to occur within close proximity to the DCSS. Mitigation as presented in the Biological Guidelines and Section 7 of this report will reduce any potential impacts to Cooper's Hawk or the MHPA to less than significant.

6.2 Issue 2: Sensitive Natural Communities

The proposed project would have a significant effect on biological resources if it would:

- b) *Have a substantial adverse impact on any riparian habitat, Tier I habitat, Tier II habitat, Tier IIIA habitat or Tier IIIB habitat or other sensitive natural community as identified in the Biology Guidelines of the Land Development Manual or in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.*

6.2.1 Special-Status Vegetation Communities

Two special-status (Tier II) vegetation communities occur within the study area (DCSS and disturbed DCSS). However, both of these communities are not inside or near the grading limits. Therefore, the proposed project is not anticipated to impact special-status vegetation communities, and no mitigation is recommended.

6.3 Issue 3: Wetlands

The proposed project would have a significant effect on biological resources if it would:

- c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc....) through direct removal, filling, hydrological interruption, or other means.*

6.3.1 Jurisdictional Waters

No areas identified as jurisdictional waters and no City defined wetlands occur within the project impact area, or have the potential to be impacted by project activities, therefore no mitigation is recommended.

6.4 Issue 4: Wildlife Corridors

The proposed project would have a significant effect on biological resources if it would:

- d) *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 Plan, or impede the use of native wildlife nursery sites.*

6.4.1 Wildlife Corridors

The project site is located within a conservation planning linkage (SanBIOS 2019). A core linkage occurs to the north of the project site in undeveloped land. However, the study area is bordered on the west by I-5, to the south by Genesee Avenue, and to the east by Campus Point Drive. Additionally, the grading limits in the north and south of the project site does not support habitat that would contribute substantially to allow for the function of any local or regional wildlife or corridor linkages (Figure 4). The immediate surrounding area consists primarily of developed urban landscapes. Given the developed nature of the surroundings, the site would not function as a wildlife corridor or linkage, or as a wildlife nursery site. Therefore, impacts would be less than significant, and no mitigation is recommended.

6.5 Issue 5: Habitat Conservation Plans

The proposed project would have a significant effect on biological resources if it would:

- e) *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 plan area or the surrounding region.*

6.5.1 Habitat Conservation Plans

The project site is within the Subarea Plan and has been evaluated for conformance with the Subarea Plan, and the City of San Diego Environmentally Sensitive Lands Regulations. Potential impacts to regulated resources under these plans are mitigated in accordance with these plans. Prior to issuance of any construction permit or notice to proceed MSCP staff should verify the Applicant is in conformance with the City's MSCP MHPA Land Use Adjacency Guidelines (this is detailed in section 7.0 below).

6.6 Issue 6: Local Policies and Ordinances

The proposed project would have a significant effect on biological resources if it would:

- g) *Conflict with any local policies or ordinances protecting biological resources.*

6.6.1 Local Policies and Ordinances

The project is consistent with the City's MSCP and does not significantly impact any MSCP-covered species.

6.7 Issue 7: Invasive Species

The proposed project would have a significant effect on biological resources if it would:

h) Result in an introduction of invasive species of plants in a natural open space area.

6.7.1 Invasive Species

No natural open space areas will be directly or indirectly impacted by the proposed project. Therefore, the project would not result in the introduction or spread of invasive species into a natural open space and no mitigation is required. The project would remove invasive species from the study area and ensure that invasive species are not planted as part of landscaping.

6.8 Indirect Impacts

Indirect impacts are physical changes to the environment which are not immediately related to a project but are caused indirectly. As listed in the Guidelines, indirect impacts include the introduction of meso-predators (e.g. dogs and cats), urban runoff, invasive plant species, noise and lighting effects, alteration of the dynamic portion of a system (e.g. stream flow characteristics), and loss of a wetland buffer. The proposed project has the potential to result in increased noise within the project site. The site is previously developed, is zoned for development, is surrounded by development and a freeway, and would most likely require a Stormwater Pollution Prevention Plan (SWPPP)/MS4 permit. Therefore, indirect impacts associated with urban runoff, meso-predator and invasive plant species introduction, lighting, and alteration of stream flow characteristics are not expected to be significant.

6.8.1 Urban Runoff

The project does not have the potential to result in increased urban runoff from the project site since the construction area is already almost entirely paved. There will be no net increase in hardscape areas.

6.8.2 Lighting

The proposed project may result in an increase in lighting in the project area due to the construction of new buildings. However, the study area is surrounded on all sides by development, and no sensitive habitat areas are located adjacent to planned construction in the south and west areas of the project site (DCSS only occurs in the north and east areas). Therefore, the project is not expected to substantially increase lighting in the area beyond what is currently present, and indirect impacts are not significant.

6.8.3 Meso-Predator Introduction

The project site currently contains significant vegetative coverage by non-native, invasive plant species due to prior development on and adjacent to the site. The proposed project is not expected

to substantially increase meso-predators in the project area given the surrounding level of development that currently exists and the fact that the grading limits is not in close in proximity to any natural areas. Therefore, indirect impacts associated with introduction of meso-predators are not expected.

7 Mitigation, Monitoring, and Reporting

The following mitigation measures are proposed to reduce potential project impacts to below a level of significance.

7.1 Mitigation for Sensitive Species

7.1.1 Special Status Species

BIO-1

Due to the moderate to high potential of Cooper 's hawk occurrences, if construction occurs in or near the MHPA within the breeding season (February 1 to August 31), an avoidance area of 300 feet from any Cooper's hawk nest that occurs within the MHPA would be required.

BIO-2

If site preparation and construction activities are initiated during the breeding season (generally February 1 through August 31, but variable based on seasonal and annual climatic conditions), a pre-construction nesting bird survey will be conducted by a qualified biologist no more than 3 days prior to initial ground disturbance or vegetation removal to determine the presence/absence, location, and status of any active nests on site or within 100 feet of the site for common nesting birds, or within 300 feet of the site for nesting raptors. In areas where site access is limited or prohibited (e.g., private property), the area will be surveyed using binoculars. Should land clearing activities pause for more than one week during the breeding season, another nesting bird survey will be conducted prior to re-initiation of those activities.

If active nests are found, the qualified biologist will establish and demarcate with fencing or flagging an appropriate buffer (dependent upon the species, proposed work activity, and existing disturbances associated with land uses outside of the site) around the active nest(s). No ground disturbing activities will occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. The qualified biologist will monitor the active nest(s) to determine the adequacy of the buffer. Encroachment into the buffer would occur only at the discretion of the qualified biologist.

The methods and results of the nesting bird survey(s), any nesting bird avoidance efforts, and the success of the avoidance buffers will be documented in a letter report to the City no later than 3 weeks following the completion of the survey(s) and/or active nest monitoring activities.

7.1.2 Habitat Conservation Plans

LU-1

Prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff should verify the Applicant has accurately represented the project's design in or on the Construction Documents (CDs/CDs consist of Construction Plan Sets for Private Projects and Contract

Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit “A”, and also the City’s MultiSpecies Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant should provide an implementing plan and include references on/in CDs of the following:

1. **Grading/Land Development/MHPA Boundaries.** MHPA boundaries on site and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.
2. **Drainage.** All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.
3. **Toxics/Project Staging Areas/Equipment Storage.** Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactful to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved grading limits. Where applicable, this requirement shall be incorporated into leases on publicly-owned property when applications for renewal occur. Provide a note in/on the CDs that states: “All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA.”
4. **Lighting.** Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.
5. **Barriers.** New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.
6. **Invasives.** No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.
7. **Brush Management.** New development adjacent to the MHPA shall be set back from the MHPA to provide required Brush Management Zone 1 area on the building pad outside of the MHPA. Zone 2 may be located within the MHPA provided the Zone 2 management will be the responsibility of an HOA or other private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than currently required by the City’s regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done and vegetation clearing shall be prohibited within native coastal sage scrub and chaparral habitats from March 1-August 15 except where the City ADD/MMC has

documented the thinning would be consist with the City's MSCP Subarea Plan. Existing and approved projects are subject to current requirements of Municipal Code Section 142.0412.

8. **Noise.** Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: California Gnatcatcher (3/1-8/15). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring. When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated as follows. It is important to note that while suitable CAGN habitat (DCSS) occurs on site, most of the DCSS is disturbed, the habitat size is very small, and it is far from the grading limits (Figure 4). However, construction noise may have an impact on any potential nesting CAGN.

8 Limitations, Assumptions, and Use Reliance

This General Biological Letter Report has been performed in accordance with professionally accepted biological investigation practices conducted at this time and in this geographic area. The biological investigation is limited by the scope of work performed. Biological surveys for the presence or absence of certain taxa have been conducted as part of this assessment but were not performed during a particular blooming period, nesting period, or particular portion of the season when positive identification would be expected if present, and therefore, cannot be considered definitive. The biological surveys are limited also by the environmental conditions present at the time of the surveys. In addition, general biological (or protocol) surveys do not guarantee that the organisms are not present and will not be discovered in the future within the site. In particular, mobile wildlife species could occupy the site on a transient basis or re-establish populations in the future. Our field studies were based on current industry practices, which change over time and may not be applicable in the future. No other guarantees or warranties, expressed or implied, are provided. The findings and opinions conveyed in this report are based on findings derived from site reconnaissance, jurisdictional areas, review of CNDDDB RareFind5, and specified historical and literature sources. Standard data sources relied upon during the completion of this report, such as the CNDDDB, may vary with regard to accuracy and completeness. In particular, the CNDDDB is compiled from research and observations reported to CDFW that may or may not have been the result of comprehensive or site-specific field surveys. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research and analysis.

Thank you for the opportunity to provide this Biological Resources Assessment. Please contact the undersigned with any questions.

Rincon Consultants, Inc.



Brooke Pickett
Associate Biologist



Steven J. Hongola
Principal/Senior Ecologist

9 References

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9.2 List of Preparers

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Appendix A

Plant and Wildlife Species Observed

Scientific Name	Common Name	Status	Native or Introduced	Location
Plants				
<i>Opuntia engelmannii</i>	Engelmann prickly pear	None	Native	DCSS
<i>Plumbago auriculata</i>	cape leadwort	None	Introduced	DCSS
<i>Cortaderia selloana</i>	pampas grass	None	Introduced	DCSS
<i>Rhus ovata</i>	sugar bush	None	Native	DCSS
<i>Malacothrix</i> spp.	cliff aster	None	Native	DCSS
<i>Bromus rubens</i>	red brome	None	Introduced	DCSS
<i>Nicotiana glauca</i>	tree tobacco	None	Introduced	DCSS
<i>Salvia mellifera</i>	black sage	None	Native	DCSS
<i>Toxicodendron diversilobum</i>	poison oak	None	Native	DCSS
<i>Cirsium vulgare</i>	bullthistle	None	Introduced	DCSS
<i>Salsola tragus</i>	Russian thistle	None	Introduced	DCSS
<i>Eriogonum fasciculatum</i>	California buckwheat	None	Native	DCSS
<i>Muhlenbergia rigens</i>	deergrass	None	Native	DCSS
<i>Sambucus nigra</i>	black elderberry	None	Native	DCSS
<i>Erigeron canadensis</i>	horseweed	None	Native	DCSS
<i>Populus fremontii</i>	Fremont cottonwood	None	Native	DCSS
<i>Callistemon citrinus</i>	crimson bottlebrush	None	Introduced	DCSS
<i>Stipa miliacea</i>	smilo grass	None	Introduced	DCSS
<i>Malacothamnus fasciculatus</i>	chaparral bush mallow	None	Native	DCSS
<i>Marrubium vulgare</i>	white horehound	None	Introduced	DCSS
<i>Rhus integrifolia</i>	lemonade berry	None	Native	DCSS
<i>Hesperoyucca whipplei</i>	chaparral yucca	None	Native	DCSS
<i>Erioghyllum confertifolium</i>	yellow yarrow	None	Native	DCSS
<i>Elymus condensatus</i>	giant wild rye	None	Native	DCSS
<i>Heteromeles arbutifolia</i>	toyon	None	Native	DCSS
<i>Quercus agrifolia</i>	coast live oak	None	Native	DCSS
<i>Atriplex semibaccata</i>	Australian saltbush	None	Introduced	DCSS
<i>Avena fatua</i>	wildoats	None	Introduced	DCSS
<i>Bromus hordeaus</i>	soft chess	None	Introduced	DCSS
<i>Foeniculum vulgare</i>	fennel	None	Introduced	DCSS
<i>Artemisia californica</i>	California sage brush	None	Native	DCSS, Eucalyptus grove
<i>Cercis occidentalis</i>	western redbud	None	Native	Eucalyptus grove
<i>Brassica nigra</i>	black mustard	None	Introduced	Eucalyptus grove
<i>Encelia californica</i>	bush sunflower	None	Native	Eucalyptus grove
<i>Malosma laurina</i>	laurel sumac	None	Native	DCSS, Eucalyptus grove
<i>Eucalyptus calophylla</i>	redgum	None	Introduced	Eucalyptus grove
<i>Pinus radiata</i>	Monterey pine	None	Introduced	Eucalyptus grove
<i>Bromus diandrus</i>	ripgut brome	None	Introduced	DCSS, Eucalyptus grove
<i>Acacia confusa</i>	small philippine acacia	None	Introduced	Eucalyptus grove
<i>Caragana arborescens</i>	Siberian peashrub	None	Introduced	Eucalyptus grove
<i>Aloe barbadensis miller</i>	aloe vera	None	Introduced	Eucalyptus grove

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Scientific Name	Common Name	Status	Native or Introduced	Location
<i>Rosmarinus officinalis</i>	rosemary	None	Introduced	Eucalyptus grove
<i>Salvia dorrii</i>	Dorr's sage	None	Native	Eucalyptus grove
<i>Equisetum fluviatile</i>	water horsetail	None	Introduced	Eucalyptus grove
<i>Euphorbia hirta</i>	asthma weed	None	Introduced	DCSS, Eucalyptus grove
<i>Apium graveolens</i>	wild celery	None	Introduced	Eucalyptus grove
<i>Euphorbia maculata</i>	spotted spurge	None	Introduced	Eucalyptus grove
<i>Mentha suaveolens</i>	apple mint	None	Introduced	Eucalyptus grove
<i>Acacia melanoxylon</i>	blackwood acacia	None	Introduced	Eucalyptus grove
<i>Baccharis pilularis</i>	coyote brush	None	Native	DCSS, Eucalyptus grove
<i>Washingtonia robusta</i>	Mexican fan palm	None	Introduced	Eucalyptus grove
<i>Carduus pycnocephalus</i>	italian thistle	None	Introduced	Eucalyptus grove
<i>Acacia dealbata</i>	silver wattle	None	Introduced	Eucalyptus grove
<i>Aloe arborescens</i>	candelabra aloe	None	Introduced	parking lot
<i>Dracaena reflexa</i>	song of India	None	Introduced	parking lot
<i>Agave attenuata</i>	lion's tail agave	None	Introduced	parking lot
<i>Perovskia atriplicifolia</i>	Russian sage	None	Introduced	parking lot
<i>Salvia microphylla</i>	baby sage	None	Introduced	parking lot
<i>Juncus inflexus</i>	hard rush	None	Introduced	parking lot
<i>Bahiopsis parishii</i>	shrubby goldeneye	None	Native	parking lot
<i>Brickellia californica</i>	California brickellia	None	Native	parking lot
<i>Dietes iridioides</i>	iris	None	Native	parking lot
<i>Koelneuteria paniculata</i>	goldenrain	None	Native	parking lot
<i>Festuca glauca</i>	blue fescue	None	Introduced	parking lot
<i>Agave americana</i>	century plant	None	Introduced	parking lot
<i>Achillea millefolium</i>	yarrow	None	Native	parking lot
<i>Gleditsia triacanthos</i>	honeylocust	None	Introduced	parking lot
<i>Aeonium arboreum</i>	tree aenium	None	Introduced	parking lot
<i>Echinocactus grusonii</i>	golden barrel cactus	None	Introduced	parking lot
<i>Echeveria elegans</i>	Mexican snow ball	None	Introduced	parking lot
<i>Miscanthus sinensis</i>	Chinese silver grass	None	Introduced	parking lot
<i>Anigozanthos flavidus</i>	kangaroo paws	None	Introduced	parking lot
<i>Pyrus commenis</i>	common pear	None	Introduced	parking lot
<i>Chloris virgata</i>	feather finger grass	None	Introduced	parking lot
<i>Malephora crocea</i>	coppery mesembryanthemum	None	Introduced	parking lot
<i>Eschscholzia californica</i>	California poppy	None	Native	parking lot
<i>Olea europaea</i>	olive tree	None	Introduced	parking lot

Scientific Name	Common Name	Status	Native or Introduced	Location
Animals				
Mammals				
<i>Canis latrans</i>	coyote	None	Native	N/A
Reptiles				
<i>Sceloporus occidentalis</i>	western fence lizard	None	Native	N/A
Birds				
<i>Melospiza crissalis</i>	California towhee	None	Native	N/A
<i>Thryomanes bewickii</i>	Bewick's Wren	None	Native	N/A
<i>Peucaea cassinii</i>	Cassin's Sparrow	None	Native	N/A
<i>Melospiza melodia</i>	song Sparrow	None	Native	N/A
<i>Accipiter cooperii</i>	Cooper's Hawk	MSCP	Native	N/A
<i>Troglodytes aedon</i>	house Wren	None	Native	N/A
<i>Haemorhous mexicanus</i>	house Finch	None	Native	N/A
<i>Zenaidura macroura</i>	mourning Dove	None	Native	N/A
<i>Calypte anna</i>	Anna's Hummingbird	None	Native	N/A
<i>Corvus corax</i>	common Raven	None	Native	N/A

Appendix B

Potential Species List

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
Plants and Lichens				
<i>Abronia maritima</i> red sand-verbena	None/None G4/S3? 4.2	Coastal dunes. Dune plant. 0-100 m. perennial herb. Blooms Feb-Nov	None	Habitat requirements for this species such as coastal dunes not present on site.
<i>Acanthomintha ilicifolia</i> San Diego thorn-mint	FT/CE G1/S1 1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Endemic to active vertisol clay soils of mesas & valleys. Usually on clay lenses within grassland or chaparral communities. 25-945 m. annual herb. Blooms Apr-Jun	Low	Coastal sage scrub present on site. However, active vertisol clay soils not present on site. Existing disturbances, surrounding development, and the prevalence of non-native species reduce the potential for occurrence. Species was not observed during the field survey.
<i>Acmispon prostratus</i> Nuttall's acmispon	None/None G1G2/S1 1B.1	Coastal dunes, coastal scrub. On sand dunes. 0-18 m. annual herb. Blooms Mar-Jun(Jul)	Low	Coastal sage scrub present on site, however, sand dunes are not present on site. Existing disturbances, surrounding development, and the prevalence of non-native species reduce the potential for occurrence. Elevation of the site is much higher than required. Species was not observed during the field survey.
<i>Adolphia californica</i> California adolphia	None/None G3/S2 2B.1	Chaparral, coastal sage scrub, valley and foothill grassland. From sandy/gravelly to clay soils within grassland, coastal sage scrub, or chaparral; various exposures. 5-335 m. perennial deciduous shrub. Blooms Dec-May	Low	Coastal sage scrub and sandy/gravelly to clay soils occur on site. Species was not observed during the field survey. Such a large species would have been apparent.
<i>Agave shawii</i> var. <i>shawii</i> Shaw's agave	None/None G2G3T2/S1 2B.1	Coastal bluff scrub, coastal scrub. Coastal bluffs and slopes within coastal sage scrub. 10-120 m. perennial leaf succulent. Blooms Sep-May	None	Coastal sage scrub occurs on site, however, coastal bluffs do not occur on site within coastal sage scrub. Species was not observed during the field survey.
<i>Ambrosia pumila</i> San Diego ambrosia	FE/None G1/S1 1B.1	Chaparral, coastal scrub, valley and foothill grassland. Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 3-580 m. perennial rhizomatous herb. Blooms Apr-Oct	Low	Coastal sage scrub present on site. However, existing disturbances, surrounding development, and the prevalence of non-native species reduce the potential for occurrence. Species was not observed during the field survey.
<i>Aphanisma blitoides</i> aphanisma	None/None G3G4/S2 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. On bluffs and slopes near the ocean in sandy or clay soils. 3-305 m. annual herb. Blooms Feb-Jun	Low	Coastal sage scrub present on site. However, bluffs and slopes near the ocean are not present on site. Species was not observed during the field survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i> Del Mar manzanita	FE/None G5T2/S2 1B.1	Chaparral. Sandy coastal mesas and ocean bluffs; in chaparral or Torrey pine forest. 30-365 m. perennial evergreen shrub. Blooms Dec-Jun	None	Habitat requirements for this species such as chaparral not present on site.
<i>Artemisia palmeri</i> San Diego sagewort	None/None G3?/S3? 4.2	Coastal scrub, chaparral, riparian forest, riparian woodland, riparian scrub. In drainages and riparian areas in sandy soil within chaparral and other habitats. 15-915 m. perennial deciduous shrub. Blooms (Feb)May-Sep	Low	Coastal sage scrub present on site, however, drainages and riparian areas are not present on site. Species was not observed during the field survey.
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch	FE/CE G2T1/S1 1B.1	Coastal bluff scrub, coastal dunes, coastal prairie. Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean; one site on a clay terrace. 1-45 m. annual herb. Blooms Mar-May	None	Habitat requirements for this species such as coastal dunes not present on site. Elevation of the site is much higher than required.
<i>Atriplex pacifica</i> South Coast saltscale	None/None G4/S2 1B.2	Coastal scrub, coastal bluff scrub, playas, coastal dunes. Alkali soils. 1-400 m. annual herb. Blooms Mar-Oct	Low	Coastal sage scrub present on site, however, alkali soils are not present on site. Species was not observed during the field survey.
<i>Baccharis vanessae</i> Encinitas baccharis	FT/CE G1/S1 1B.1	Chaparral, cismontane woodland. On sandstone soils in steep, open, rocky areas with chaparral associates. 60-900 m. perennial deciduous shrub. Blooms Aug,Oct,Nov	None	Habitat requirements for this species such as chaparral and cismontane woodland not present on site.
<i>Bergerocactus emoryi</i> golden-spined cereus	None/None G2G3/S2 2B.2	Coastal scrub, chaparral, closed-cone coniferous forest. Limited to the coastal belt. 3-395 m. perennial stem succulent. Blooms May-Jun	Low	Coastal sage scrub present on site, however, the project site does not occur along the coastal belt. Species was not observed during the field survey.
<i>Bloomeria clevelandii</i> San Diego goldenstar	None/None G2/S2 1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Mesa grasslands, scrub edges; clay soils. Often on mounds between vernal pools in fine, sandy loam. 60-465 m. perennial bulbiferous herb. Blooms Apr-May	Low	Coastal sage scrub present on site, however, the project site does not contain vernal pools. Species was not observed during the field survey.
<i>Brodiaea orcuttii</i> Orcutt's brodiaea	None/None G2/S2 1B.1	Vernal pools, valley and foothill grassland, closed-cone coniferous forest, cismontane woodland, chaparral, meadows and seeps. Mesic, clay habitats; usually in vernal pools and small drainages. 30-1615 m. perennial bulbiferous herb. Blooms May-Jul	None	Habitat requirements for this species such as vernal pools and closed-cone coniferous forest not present on site.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Camissoniopsis lewisii</i> Lewis' evening-primrose	None/None G4/S4 3	Valley and foothill grassland, coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub. Sandy or clay soil. 0-300 m. annual herb. Blooms Mar-May (Jun)	High	Coastal sage scrub and sandy/clay soil is present on site. Species was not observed during survey.
<i>Ceanothus cyaneus</i> Lakeside ceanothus	None/None G2/S2 1B.2	Closed-cone coniferous forest, chaparral. 200-1040 m. perennial evergreen shrub. Blooms Apr-Jun	None	Habitat requirements for this species such as closed-cone coniferous forest and chaparral not present on site. Elevation of the site is much lower than required.
<i>Ceanothus verrucosus</i> wart-stemmed ceanothus	None/None G2/S2? 2B.2	Chaparral. 25-470 m. perennial evergreen shrub. Blooms Dec-May	None	Habitat requirements for this species such as chaparral not present on site.
<i>Centromadia parryi</i> ssp. <i>australis</i> southern tarplant	None/None G3T2/S2 1B.1	Marshes and swamps (margins), valley and foothill grassland, vernal pools. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. 0-975 m. annual herb. Blooms May-Nov	None	Habitat requirements for this species such as marshes and vernal pools not present on site.
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i> Orcutt's pincushion	None/None G5T1T2/S1 1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 3-80 m. annual herb. Blooms Jan-Aug	None	Habitat requirements for this species such as coastal dunes not present on site. Elevation of the site is much higher than required.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> salt marsh bird's-beak	FE/CE G4?T1/S1 1B.2	Marshes and swamps, coastal dunes. Limited to the higher zones of salt marsh habitat. 0-10 m. annual herb (hemiparasitic). Blooms May-Oct(Nov)	None	Habitat requirements for this species such as coastal dunes and marshes not present on site. Elevation of the site is much higher than required.
<i>Chorizanthe orcuttiana</i> Orcutt's spineflower	FE/CE G1/S1 1B.1	Coastal scrub, chaparral, closed-cone coniferous forest. Sandy sites and openings; sometimes in transition zones. 3-125 m. annual herb. Blooms Mar-May	Low	Coastal sage scrub occurs on site, however, open areas do not. Species was not observed during survey.
<i>Chorizanthe polygonoides</i> var. <i>longispina</i> long-spined spineflower	None/None G5T3/S3 1B.2	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Gabbroic clay. 30-1540 m. annual herb. Blooms Apr-Jul	Low	Coastal sage scrub present on site, however, the project site does not contain gabbroic clay soils. Species was not observed during the field survey.
<i>Cistanthe maritima</i> seaside cistanthe	None/None G3G4/S3 4.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Sea bluffs; sandy sites. 5-300 m. annual herb. Blooms (Feb)Mar-Jun(Aug)	Low	Coastal sage scrub present on site, however, the project site does not contain sea bluffs. Species was not observed during the field survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i> summer holly	None/None G3T2/S2 1B.2	Chaparral, cismontane woodland. Often in mixed chaparral in California, sometimes post-burn. 30-945 m. perennial evergreen shrub. Blooms Apr-Jun	None	Habitat requirements for this species such as chaparral and cismontane woodland not present on site.
<i>Convolvulus simulans</i> small-flowered morning-glory	None/None G4/S4 4.2	Chaparral, coastal scrub, valley and foothill grassland. Wet clay, serpentine ridges. 30-700 m. annual herb. Blooms Mar-Jul	Low	Coastal sage scrub present on site, however, wet clay and serpentine ridges are not present on site. Species was not observed during the field survey.
<i>Corethrogyne filaginifolia</i> var. <i>incana</i> San Diego sand aster	None/None G4T1Q/S1 1B.1	Coastal scrub, coastal bluff scrub, chaparral. Most sites are disturbed, so hard to tell. Possibly in disturbed sites and ecotones. 35-115 m. perennial herb. Blooms Jun-Sep	High	Coastal sage scrub and disturbed habitat occurs on site. Species was not observed during survey.
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i> Del Mar Mesa sand aster	None/None G4T1Q/S1 1B.1	Chaparral, coastal scrub, coastal bluff scrub. In coastal, shrubby communities on maritime sediments and conglomerates; in openings. 15-150 m. perennial herb. Blooms May,Jul,Aug,Sep	Low	Coastal sage scrub present on site, however, maritime sediments and conglomerates are not present on site. Species was not observed during the field survey.
<i>Cylindropuntia californica</i> var. <i>californica</i> snake cholla	None/None G3T2/S1 1B.1	Chaparral, coastal scrub. 15-290 m. perennial stem succulent. Blooms Apr-May	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Dichondra occidentalis</i> western dichondra	None/None G3G4/S3S4 4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. On sandy loam, clay, and rocky soils. 50-500 m. perennial rhizomatous herb. Blooms (Jan)Mar-Jul	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Dudleya brevifolia</i> short-leaved dudleya	None/CE G1/S1 1B.1	Chaparral, coastal scrub. On Torrey sandstone soils; in pebbly openings. 30-125 m. perennial herb. Blooms Apr-May	Low	Coastal sage scrub present on site, however, Torrey sandstone soils are not present on site. Species was not observed during the field survey.
<i>Dudleya variegata</i> variegated dudleya	None/None G2/S2 1B.2	Chaparral, coastal scrub, cismontane woodland, valley and foothill grassland. In rocky or clay soils; sometimes associated with vernal pool margins. 3-550 m. perennial herb. Blooms Apr-Jun	Moderate	Coastal sage scrub occurs on site, however, vernal pools are not present. Species was not observed during the field survey.
<i>Dudleya viscida</i> sticky dudleya	None/None G2/S2 1B.2	Coastal scrub, coastal bluff scrub, chaparral, cismontane woodland. On north and south-facing cliffs and banks. 20-870 m. perennial herb. Blooms May-Jun	Low	Coastal sage scrub present on site, however, north and south-facing cliffs and banks are not present. Species was not observed during the field survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Ericameria palmeri</i> var. <i>palmeri</i> Palmer's goldenbush	None/None G4T2?/S2 1B.1	Coastal scrub, chaparral. On granitic soils, on steep hillsides. Mesic sites. 5-625 m. perennial evergreen shrub. Blooms (Jul)Sep-Nov	Low	Coastal sage scrub present on site, however, granitic soils and steep hillsides are not present. Species was not observed during the field survey.
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	FE/CE G5T1/S1 1B.1	Vernal pools, coastal scrub, valley and foothill grassland. San Diego mesa hardpan & claypan vernal pools & southern interior basalt flow vernal pools; usually surrounded by scrub. 15-880 m. annual/perennial herb. Blooms Apr-Jun	Low	Coastal sage scrub present on site, however, mesa hardpan and vernal pools are not present. Species was not observed during the field survey.
<i>Erysimum ammophilum</i> sand-loving wallflower	None/None G2/S2 1B.2	Chaparral (maritime), coastal dunes, coastal scrub. Sandy openings. 5-130 m. perennial herb. Blooms Feb-Jun	Low	Coastal sage scrub present on site, however, sandy openings are not present. Species was not observed during the field survey.
<i>Euphorbia misera</i> cliff spurge	None/None G5/S2 2B.2	Coastal bluff scrub, coastal scrub, Mojavean desert scrub. Rocky sites. 3-430 m. perennial shrub. Blooms Dec-Aug(Oct)	Low	Coastal sage scrub present on site, however, rocky sites are not present on site. Species was not observed during the field survey.
<i>Ferocactus viridescens</i> San Diego barrel cactus	None/None G3?/S2S3 2B.1	Chaparral, coastal scrub, valley and foothill grassland. Often on exposed, level or south-sloping areas; often in coastal scrub near crest of slopes. 3-490 m. perennial stem succulent. Blooms May-Jun	Low	Coastal sage scrub present on site, however, this habitat is relatively flat (no slopes). Species was not observed during the field survey.
<i>Frankenia palmeri</i> Palmer's frankenia	None/None G3?/S1 2B.1	Coastal dunes, marshes (coastal salt), playas. 3-10 m. perennial herb. Blooms May-Jul	None	Habitat requirements for this species such as coastal dunes and marshes not present on site. Elevation of the site is much higher than required.
<i>Geothallus tuberosus</i> Campbell's liverwort	None/None G1/S1 1B.1	Coastal scrub, vernal pools. Liverwort known from mesic soil. 10-600 m. ephemeral liverwort.	Low	Coastal sage scrub present on site, however, mesic soils are not. Species was not observed during the field survey.
<i>Grindelia hallii</i> San Diego gumplant	None/None G2/S2 1B.2	Meadows and seeps, valley and foothill grassland, chaparral, lower montane coniferous forest. Frequently occurs in low moist areas in meadows. Associated species commonly include <i>Wyethia</i> , <i>Ranunculus</i> , <i>Sidalcea</i> . 180-1810 m. perennial herb. Blooms May-Oct	None	Habitat requirements for this species such as meadows and coniferous forest not present on site.
<i>Harpagonella palmeri</i> Palmer's grapplinghook	None/None G4/S3 4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within shrubland. 20-955 m. annual herb. Blooms Mar-May	Low	Coastal sage scrub occurs on site, however, grassy areas do not occur within the shrubland. Species was not observed during survey.

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Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i> beach goldenaster	None/None G4T2T3/S1 1B.1	Coastal dunes, coastal scrub, chaparral (coastal). Sandy sites. 0-5 m. perennial herb. Blooms Mar-Dec	None	Elevation of the site is much higher than required.
<i>Holocarpha virgata</i> ssp. <i>elongata</i> graceful tarplant	None/None G5T3/S3 4.2	Chaparral, coastal scrub, valley and foothill grassland, cismontane woodland. 60-1100 m. annual herb. Blooms May-Nov	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Hordeum intercedens</i> vernal barley	None/None G3G4/S3S4 3.2	Valley and foothill grassland, vernal pools, coastal dunes, coastal scrub. Vernal pools, dry, saline streambeds, alkaline flats. 5-1000 m. annual herb. Blooms Mar-Jun	Low	Coastal sage scrub occurs on site, however, vernal pools, saline streambeds, and alkaline flats do not occur on site. Species was not observed during survey.
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	None/None G3G5T2T3/ S2 1B.2	Coastal scrub, chaparral. Sandy soils; often in disturbed sites. 1-915 m. perennial shrub. Blooms Apr-Nov	High	Coastal sage scrub and disturbed habitat occurs on site. Species was not observed during survey.
<i>Iva hayesiana</i> San Diego marsh-elder	None/None G3/S2 2B.2	Marshes and swamps, playas. Riverwashes. 1-430 m. perennial herb. Blooms Apr-Oct	None	Habitat requirements for this species such as marshes and playas not present on site.
<i>Juncus acutus</i> ssp. <i>leopoldii</i> southwestern spiny rush	None/None G5T5/S4 4.2	Salt marshes, alkaline seeps, coastal dunes (mesic sites). Moist saline places. 3-900 m. perennial rhizomatous herb. Blooms (Mar)May-Jun	None	Habitat requirements for this species such as salt marshes and coastal dunes not present on site.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	None/None G4T2/S2 1B.1	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1375 m. annual herb. Blooms Feb-Jun	None	Habitat requirements for this species such as coastal salt marshes and vernal pools not present on site.
<i>Lepidium virginicum</i> var. <i>robinsonii</i> Robinson's pepper-grass	None/None G5T3/S3 4.3	Chaparral, coastal scrub. Dry soils, shrubland. 4-1435 m. annual herb. Blooms Jan-Jul	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Leptosyne maritima</i> sea dahlia	None/None G2/S1S2 2B.2	Coastal scrub, coastal bluff scrub. Occurs on a variety of soil types, including sandstone. 5-185 m. perennial herb. Blooms Mar-May	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Lycium californicum</i> California box-thorn	None/None G4/S4 4.2	Coastal bluff scrub, coastal scrub. 5-150 m. perennial shrub. Blooms (Dec)Mar,Jun,Jul,Aug	High	Coastal sage scrub occurs on site. Species was not observed during survey.
<i>Microseris douglasii</i> ssp. <i>platycarpha</i> small-flowered microseris	None/None G4T4/S4 4.2	Cismontane woodland, valley and foothill grassland, coastal scrub, vernal pools. Alkaline clay in river bottoms. 15-1070 m. annual herb. Blooms Mar-May	Low	Coastal sage scrub occurs on site, however, alkaline clay in river bottoms does not occur on site. Species was not observed during survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Monardella viminea</i> willow monardella	FE/CE G1/S1 1B.1	Coastal scrub, chaparral, riparian forest, riparian scrub, riparian woodland. In canyons, in rocky and sandy places, sometimes in washes or floodplains; with <i>Baccharis</i> , <i>Iva</i> , etc. Alluvial, ephemeral washes with adjacent coastal scrub. 45-230 m. perennial herb. Blooms Jun-Aug	Low	Coastal sage scrub occurs on site. However, rocky canyons and alluvial ephemeral washes do not occur on site. Species was not observed during survey.
<i>Myosurus minimus</i> ssp. <i>apus</i> little mousetail	None/None G5T2Q/S2 3.1	Vernal pools, valley and foothill grassland. Alkaline soils. 20-640 m. annual herb. Blooms Mar-Jun	None	Habitat requirements for this species such as vernal pools and foothill grassland not present on site.
<i>Navarretia fossalis</i> spreading navarretia	FT/None G2/S2 1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan & San Diego claypan vernal pools; in swales & vernal pools, often surrounded by other habitat types. 15-850 m. annual herb. Blooms Apr-Jun	None	Habitat requirements for this species such as vernal pools and swamps not present on site.
<i>Nemacaulis denudata</i> var. <i>denudata</i> coast woolly-heads	None/None G3G4T2/S2 1B.2	Coastal dunes. 0-100 m. annual herb. Blooms Apr-Sep	None	Habitat requirements for this species such as coastal dunes not present on site.
<i>Ophioglossum californicum</i> California adder's-tongue	None/None G4/S4 4.2	Chaparral, vernal pool areas, valley and foothill grassland. Grassy pastures, vernal pool margins, chaparral. Mesic sites. 60-525 m. perennial rhizomatous herb. Blooms (Dec)Jan-Jun	None	Habitat requirements for this species such as chaparral and vernal pools not present on site.
<i>Orcuttia californica</i> California Orcutt grass	FE/CE G1/S1 1B.1	Vernal pools. 10-660 m. annual herb. Blooms Apr-Aug	None	Habitat requirements for this species such as vernal pools not present on site.
<i>Orobanche parishii</i> ssp. <i>brachyloba</i> short-lobed broomrape	None/None G4?T4/S3 4.2	Coastal bluff scrub, coastal dunes, coastal scrub. Sandy soil near beaches; reported to grow on <i>Isocoma menziesii</i> and other shrubs. 3-305 m. perennial herb (parasitic). Blooms Apr-Oct	Low	Coastal sage scrub occurs on site, however, sandy beach soils do not. Species not observed on site.
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i> south coast branching phacelia	None/None G5?T3Q/S3 3.2	Chaparral, coastal scrub, coastal dunes, coastal salt marsh. Sandy, sometimes rocky sites. 5-300 m. perennial herb. Blooms Mar-Aug	High	Coastal sage scrub and sandy sites occur on site. Species not observed on site.
<i>Phacelia stellaris</i> Brand's star phacelia	None/None G1/S1 1B.1	Coastal scrub, coastal dunes. Open areas. 3-370 m. annual herb. Blooms Mar-Jun	Low	Coastal sage scrub occurs on site, however, open areas do not. Species not observed on site.
<i>Pinus torreyana</i> ssp. <i>torreyana</i> Torrey pine	None/None G1T1/S1 1B.2	Closed-cone coniferous forest, chaparral. On dry, sandstone slopes. 70-160 m. perennial evergreen tree.	None	Habitat requirements for this species such as closed-cone coniferous forest and chaparral not present on site.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Piperia cooperi</i> chaparral rein orchid	None/None G3G4/S3S4 4.2	Chaparral, cismontane woodland, valley and foothill grassland. 15-1585 m. perennial herb. Blooms Mar-Jun	None	Habitat requirements for this species such as chaparral and cismontane woodland not present on site.
<i>Pogogyne abramsii</i> San Diego mesa mint	FE/CE G1/S1 1B.1	Vernal pools. Vernal pools within grasslands, chamise chaparral, or coastal sage scrub communities. 70-195 m. annual herb. Blooms Mar-Jul	None	Habitat requirements for this species such as vernal pools not present on site.
<i>Pogogyne nudiuscula</i> Otay Mesa mint	FE/CE G1/S1 1B.1	Vernal pools. Dry beds of vernal pools and moist swales with <i>Eryngium aristulatum</i> var. <i>parishii</i> and <i>Orcuttia californica</i> . 135-165 m. annual herb. Blooms May-Jul	None	Habitat requirements for this species such as vernal pools not present on site.
<i>Quercus dumosa</i> Nuttall's scrub oak	None/None G3/S3 1B.1	Closed-cone coniferous forest, chaparral, coastal scrub. Generally on sandy soils near the coast; sometimes on clay loam. 15-640 m. perennial evergreen shrub. Blooms Feb-Apr(May-Aug)	Low	Coastal sage scrub occurs on site. This noticeable species was not observed on site.
<i>Selaginella cinerascens</i> ashy spike-moss	None/None G3G4/S3 4.1	Chaparral, coastal scrub. 20-640 m. perennial rhizomatous herb.	Moderate	Coastal sage scrub occurs on site. However, most coastal sage scrub on site is disturbed and may not be suitable for this species.
<i>Senecio aphanactis</i> chaparral ragwort	None/None G3/S2 2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. 20-855 m. annual herb. Blooms Jan-Apr(May)	Low	Coastal sage scrub present on site, however, dry alkaline flats are not present on site. Species was not observed during the field survey.
<i>Sidalcea neomexicana</i> salt spring checkerbloom	None/None G4/S2 2B.2	Playas, chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub. Alkali springs and marshes. 3-2380 m. perennial herb. Blooms Mar-Jun	Low	Coastal sage scrub occurs on site, however, alkali springs and marshes do not. Species was not observed during the field survey.
<i>Sphaerocarpos drewei</i> bottle liverwort	None/None G1/S1 1B.1	Chaparral, coastal scrub. Liverwort in openings; on soil. 90-600 m. ephemeral liverwort.	Moderate	Coastal sage scrub occurs on site. However, most coastal sage scrub on site is disturbed and may not be suitable for this species.
<i>Stipa diegoensis</i> San Diego County needle grass	None/None G4/S4 4.2	Chaparral, coastal scrub. Rocky slopes, sea cliffs and stream banks; often in mesic sites. 10-800 m. perennial herb. Blooms Feb-Jun	Low	Coastal sage scrub occurs on site. However, rocky slopes, sea cliffs, and stream banks do not. Species was not observed during the field survey.
<i>Suaeda esteroa</i> estuary seablite	None/None G3/S2 1B.2	Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. 0-80 m. perennial herb. Blooms (May)Jul-Oct(Jan)	None	Habitat requirements for this species such as marshes and swamps not present on site. Elevation of the site is higher than required.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Suaeda taxifolia</i> woolly seablite	None/None G4/S4 4.2	Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. 0-50 m. perennial evergreen shrub. Blooms Jan-Dec	None	Habitat requirements for this species such as coastal dunes and marshes not present on site. Elevation of the site is higher than required.
<i>Texosporium sancti-jacobi</i> woven-spored lichen	None/None G3/S1 3	Chaparral. Open sites; in California with <i>Adenostoma fasciculatum</i> , <i>Eriogonum</i> , <i>Selaginella</i> . At Pinnacles, on small mammal pellets. 290-660 m. crustose lichen (terricolous).	None	Habitat requirements for this species such as chaparral not present on site. Elevation of the site is higher than required.
<i>Viguiera laciniata</i> San Diego County viguiera	None/None G4/S4 4.3	Chaparral, coastal scrub. Slopes and ridges. 60-750 m. perennial shrub. Blooms Feb-Jun(Aug)	Low	Coastal sage scrub occurs on site, however, slopes and ridges do not occur within this sage scrub habitat. Species not observed on site.
Invertebrates				
<i>Melitta californica</i> California mellitid bee	None/None G4?/S2?	Desert regions of SW Arizona, SE California, and Baja California, Mexico. Also collected from Torrey Pines, San Diego Co Earlier records of <i>M. wilmattae</i> pertain to this species; species was synonymized with <i>M. californica</i> in 1981.	None	Habitat requirements for this species such as desert region is not present on site. Species not observed at time of survey.
<i>Tryonia imitator</i> mimic tryonia (=California brackishwater snail)	None/None G2/S2	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.	None	Habitat requirements for this species such as coastal lagoons, estuaries, and salt marshes not present on site. Species not observed at time of survey.
Reptiles				
<i>Anniella stebbinsi</i> southern California legless lizard	None/None G3/S3 SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	None	Habitat requirements for this species such as moist, loose soil not present on site. Species not observed at time of survey.
<i>Aspidoscelis tigris</i> <i>stejnegeri</i> coastal whiptail	None/None G5T5/S3 SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.	Low	Elements of the habitat requirements for this species such as semi-arid areas, however, sparse vegetation and open areas are not present on site. The species was not observed during field survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
Birds				
<i>Aimophila ruficeps</i> <i>canescens</i> southern California rufous-crowned sparrow	None/None G5T3/S3 WL	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Low	Elements of the habitat requirements for this species such as sage scrub are present on site. However, the coastal sage scrub on the project site is highly disturbed, does not support the primary constituent elements and is generally unsuitable to support this species. In addition, there are no steep, rocky hillsides on site. The species was not observed during field survey.
<i>Charadrius alexandrinus</i> <i>nivosus</i> western snowy plover	Threatened/ None G3T3/S2S3 SSC	Sandy beaches, salt pond levees & shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	None	Habitat requirements for this species such as sandy beaches and salt pond levees not present on site. Species not observed at time of survey.
<i>Laterallus jamaicensis</i> <i>coturniculus</i> California black rail	None/ Threatened G3G4T1/S1 FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	None	Habitat requirements for this species such as marshes and wet meadows not present on site. Species not observed at time of survey.
<i>Passerculus</i> <i>sandwichensis beldingi</i> Belding's savannah sparrow	None/ Endangered G5T3/S3	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in Salicornia on and about margins of tidal flats.	None	Habitat requirements for this species such as salt marshes not present on site. Species not observed at time of survey.
<i>Polioptila californica</i> <i>californica</i> coastal California gnatcatcher	Threatened/ None G4G5T2Q/S2 SSC	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	Low	Elements of the habitat requirements for this species such as sage scrub in arid washes and slopes are present on site. However, most of the coastal sage scrub on the project site is highly disturbed, lacks acreage, and has an abundance of non-native species. The site is generally unsuitable to support this species. In addition, the species was not observed during field survey.
<i>Rallus obsoletus levipes</i> light-footed Ridgway's rail	Endangered/ Endangered G5T1T2/S1 FP	Found in salt marshes traversed by tidal sloughs, where cordgrass and pickleweed are the dominant vegetation. Requires dense growth of either pickleweed or cordgrass for nesting or escape cover; feeds on molluscs and crustaceans.	None	Habitat requirements for this species such as salt marshes not present on site. Species not observed at time of survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Study Area	Habitat Suitability/ Observations
<i>Sternula antillarum browni</i> California least tern	Endangered/ Endangered G4T2T3Q/S2 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, land fills, or paved areas.	None	Habitat requirements for this species such as sand beaches, alkali flats, and paved areas along the coast are not present on site. Species not observed at time of survey.
<i>Vireo bellii pusillus</i> least Bell's vireo	Endangered/ Endangered G5T2/S2	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	None	Habitat requirements for this species such as riparian areas and dry river bottoms not present on site. Species not observed at time of survey.
Mammals				
<i>Euderma maculatum</i> spotted bat	None/None G4/S3 SSC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.	None	Habitat requirements for this species such as washes and rock crevices in caves or cliffs not present on site. Species not observed at time of survey.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None/None G5T3T4/S3S4 SSC	Coastal scrub of Southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs, and slopes.	None	Elements of the habitat requirements for this species such as sage scrub are present on site. However, the coastal sage scrub on the project site is highly disturbed, does not support the primary constituent elements and is generally unsuitable to support this species. In addition, there are no rock outcrops or rocky cliffs on site. The species was not observed during field survey.
Sensitive Natural Communities				
<i>Southern Maritime Chaparral</i> Southern Maritime Chaparral	None/None G1/S1.1			
<i>Southern Riparian Forest</i> Southern Riparian Forest	None/None G4/S4			

Appendix C

Site Photographs



Photograph 1: View of upland mustards and other forbs, facing northwest.



Photograph 2: View of Eucalyptus grove, facing southwest.



Photograph 3: View of Eucalyptus grove, facing southeast.



Photograph 4: View of disturbed Diegan coastal sage scrub, facing southeast.



Photograph 5: View of Diegan coastal sage scrub, facing northeast.