

**BIOLOGICAL RESOURCES
TECHNICAL REPORT FOR THE
CALLE CATALINA RESIDENTIAL
MINOR SUBDIVISION PROJECT**

CITY OF ESCONDIDO, CALIFORNIA

APN 238-071-023

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GLOSSARY

BCLA	Biological Core and Linkage Area
CDFG	California Department of Fish and Game (CDFW effective Jan 1 st 2013)
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Ranking
ESHA	Environmental Sensitive Habitat Areas
FESA	federal Endangered Species Act
FPA	Focused Planning Area
GIS	Geographic Information System
GPS	Global Positioning System
HCP	Habitat Conservation Plan
MBTA	Migratory Bird Treaty Act
MHCP	Multiple Habitat Conservation Program
MSCP	Multiple Species Conservation Program
NCCP	Natural Communities Conservation Plan
NPDS	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resources Conservation Service
OHWM	Ordinary High Water Mark
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SANDAG	San Diego Association of Governments
SSC	California Species of Special Concern
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WDR	State Waste Discharge Requirements

EXECUTIVE SUMMARY

The proposed action includes the minor subdivision of APN 238-071-023 including grading (pad development) and right-of-way road construction (Calle Catalina) for three (3) residential lots. The 2.50-acre Project Site is located in the southwest region of the City of Escondido, extending south of Gamble Lane and bisected by Calle Catalina. The Project Site is located completely within the North County Multiple Habitat Conservation Program (MHCP) area and is located within the City of Escondido Unadopted Draft Subarea Plan Area.

The Project Site is not located within or adjacent to a hardline or softline Focused Planning Area (FPA), constrained land outside of an FPA (wetland, slopes > 35%), or Biological Core and Linkage Area (BCLA). The Project Site is dominated by non-native grassland/ruderal and California buckwheat scrub vegetation with scattered native and ornamental scrub, tree and palms.

No federal or state listed threatened/endangered plant species were detected or expected to occur within or adjacent to the Project Site. No suitable habitat for sensitive plant species proposed for coverage under the City of Escondido's Draft Subarea Plan or MHCP narrow endemic species was detected onsite. Based on the lack of suitable habitat, soils, historic onsite disturbance and/or historic occurrences onsite, MHCP narrow endemic plant species are not expected to be present and the proposed action would not result in a direct or indirect impact to sensitive plant species. A detailed description of the MHCP sensitive plant species assessment is presented in the following report and summarized in Table 2, *Sensitive Plant Species Listed as Occurring or Potentially Occurring in the City of Escondido*.

Direct impacts to non-native grassland/ruderal and California buckwheat scrub/native shrubs will be reduced to a level of less than significant through the purchase of credits at the Daley Ranch Conservation Bank for projects outside an FPA to ensure compliance with the City of Escondido's Unadopted Draft Subarea Plan and General Plan (Section 5.2.1 Mitigation Standards for Vegetation Communities) as outlined in the following table and section below (Vegetation Communities Mitigation).

Vegetation Community	Project Site Onsite (ac)	Habitat Group	Mitigation Ratio	Mitigation Acres (Credits)
Non-native Grassland/Ruderal	1.94	E	0.5:1	0.97
Disturbed	0.25	F	None	--
California Buckwheat Scrub	0.23	C	2:1	0.46
Ornamental Landscaping	0.05	F	None	--
Native Shrubs	0.03	C	2:1	0.06
TOTAL	2.50			1.49

C = Coastal Sage Scrub, E = Annual Grassland, F = Other

Vegetation Communities Mitigation

Final project related mitigation obligations were based on an assessment of permanent impacts associated within the proposed subdivision and grading activities for three (3) residential development lots as outlined in the Escondido Unadopted Draft Subarea HCP Section 5.2.1, Mitigation Standards for Vegetation Communities. Prior to final

project approval of a final map or grading permit, the applicant shall mitigate impacts to 1.94 acres of non-native grassland/ruderal and 0.26-acre of California buckwheat scrub/native shrubs by purchasing a total 1.49-acre of in-kind mitigation credits from the Daley Ranch Conservation Bank. Proof of credit purchase will be submitted to the City of Escondido Planning Department and for review and approval.

No federal or state listed threatened/endangered wildlife species were detected or expected to occur within or adjacent to the Project Site. The Southern California rufous-crowned sparrow, grasshopper sparrow and northern harrier (MHCP covered and proposed Escondido Unadopted Draft Subarea covered species) may occasionally utilize the Project Site for foraging and/or breeding. Impacts to 2.17-acre of suitable habitat (Non-native Grassland/Ruderal and California Buckwheat Scrub) for these species listed as State Species of Special Concern and California Watch List would represent a less than significant impact and no mitigation is required. However, potential impacts to nesting of these three (3) sensitive bird species will be reduced to a level of less than significant following compliance with the City of Escondido's standard condition of approval for potential impacts to nesting birds and raptors during the breeding season as described below (Nesting Bird Preconstruction Survey).

Nesting Bird Preconstruction Survey

Potential direct/indirect impacts to common/sensitive nesting bird or raptor species will require compliance with the CDFG Codes 3503 & 3513. Construction outside the nesting season (between September 1st and February 1st) does not require pre-removal nesting bird surveys. If construction is proposed between February 1st and August 31st, a qualified biologist must conduct a nesting bird survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of common/sensitive nesting birds or raptors within or directly adjacent (100 feet) to the Project Site. Any nest permanently vacated for the season would not warrant protection pursuant to the CDFG Codes 3503 & 3513.

No wetlands, riparian habitat or vernal pools regulated by the United States Army Corps of Engineers, California Department of Fish and Wildlife, or Regional Water Quality Control Board were documented within or adjacent to the Project Site.

1.0 INTRODUCTION

The following biological resources technical report describes a detailed assessment of potential sensitive natural resources located within and immediately adjacent to the Calle Catalina Residences project site (Project Site). Specifically, the report has been prepared to support the CEQA documentation and City of Escondido Unadopted Draft Subarea Plan compliance review process conducted by the City of Escondido, California for the proposed minor subdivision and site development. As discussed below, the assessment includes a thorough literature review, site reconnaissance characterizing baseline conditions (including floral and faunal and dominant vegetation communities), sensitive species assessments, impact analysis, and proposed mitigation and conservation measures.

1.1 PROJECT LOCATION/DESCRIPTION

The 2.50-acre Project Site is located in the southwest region of the City of Escondido, Assessor Parcel Number (APN) 238-071-023, extending south of Gamble Lane and bisected by Calle Catalina, as shown in Figure 1, *Regional Location Map*, and Figure 2, *Project Site Map*. The Project Site is located completely within the North County Multiple Habitat Conservation Program (MHCP) area and is located within the City of Escondido Unadopted Draft Subarea Plan Area which is managed based on the Habitat Management Plan for Natural Communities in the City of Escondido. As stated by SANDAG:

“The Multiple Habitat Conservation Program (MHCP) is a comprehensive, multiple jurisdictional planning program designed to develop an ecosystem preserve in northwestern San Diego County. Implementation of the regional preserve system is intended to protect viable populations of key sensitive plant and animal species and their habitats, while accommodating continued economic development and quality of life for residents of the north county region. The MHCP is one of several large multiple jurisdictional habitat planning efforts in San Diego County (Figure 1-1), each of which constitutes a subregional plan under the State of California’s Natural Community Conservation Planning (NCCP) Act of 1991. The combination of the subregional MHCP plan and city subarea plans will serve as a multiple species Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act (ESA), as well as an NCCP plan under the NCCP Act and the California Endangered Species Act (CESA).” (SANDAG 2003a).

The proposed action includes the minor subdivision of APN 238-071-023 including grading (pad development) and right-of-way road construction (Calle Catalina) for three separate (3) residential lots.



Project Site Boundary

Photo Point & Direction

Figure 2 - Project Site Map

Biological Resources Technical Report

APN 238-071-023 - Calle Catalina Residential Subdivision



As stated by Merkel & Associates, Inc and Althouse and Meade, Inc.:

“The City of Escondido has an unadopted draft MHCP Subarea Plan dated June 2001 and does not have an Implementing Agreement or incidental take permit. Therefore, this draft Subarea Plan is not specifically applicable to any potential projects under discretionary review, although it may be referred to as a guideline. Further, based on the 2007 USFWS letter regarding non- concurrence of NCCP 4(d) rule Habitat Loss Permits, the City of Escondido has not progressed on actively developing their draft Subarea Plan and therefore, the USFWS will not concur on interim incidental take of coastal California gnatcatcher through the Habitat Loss Permit process, thus rendering the Subarea Plan ineffective to address gnatcatcher and coastal sage scrub impacts. Notwithstanding, the regulatory function of the unadopted draft City of Escondido MHCP Subarea Plan has been used as one tool for assessment of conservation design in this document.” (Merkel & Associates, Inc and Althouse and Meade, Inc 2017)

The Project Site is not located within or adjacent to a hardline/softline Focused Planning Area (FPA), constrained land outside of an FPA (wetland, slopes > 35%), or Biological Core and Linkage Area (BCLA).

2.0 METHODOLOGY

2.1 LITERATURE REVIEW

Existing biological resource conditions within and adjacent to the Project Site were initially investigated through review of pertinent scientific literature. Federal register listings, protocols, and species data provided by the United States Fish and Wildlife Service (USFWS) were reviewed in conjunction with anticipated federally listed species potentially occurring within the Project Site. The California Natural Diversity Database (CNDDDB), a California Department of Fish and Wildlife (CDFW) Natural Heritage Division species account database, San Diego Association of Governments (SANDAG) and San Diego Natural History Museum resources, were also reviewed for all pertinent information regarding the locations of known occurrences of sensitive species in the vicinity of the property. In addition, numerous regional floral and faunal field guides were utilized in the identification of species and suitable habitats. Combined, the reviewed sources provided an excellent baseline from which to inventory the biological resources potentially occurring in the area. Other sources of information included the review of unpublished biological resource letter reports and assessments. Other CDFW reports and publications consulted include the following:

- Special Animals (CDFW 2021b);
- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2021c);
- Endangered, Threatened, and Rare Plants of California (CDFW 2021d); and
- Special Vascular Plants and Bryophytes List (CDFW 2021e).
-

2.2 FIELD SURVEYS

A reconnaissance survey of the Project Site was conducted in May 7th, 2021 by Ruben Ramirez of Cadre Environmental (USFWS permit 780566-14, CDFW permit 2243) in order to characterize and identify potential sensitive plant and wildlife habitats, and to establish the accuracy of the data identified in the literature search. Geologic and soil maps were examined to identify local soil types that may support sensitive taxa. Aerial photograph, topographic maps, vegetation and rare plant maps prepared for previous studies in the region were used to determine community types and other physical features that may support sensitive plants/wildlife, uncommon taxa, or rare communities that occur within or adjacent to the Project Site. Habitat assessments were conducted for, but not limited to the following target species/groups.

- narrow endemic species
- Coastal California gnatcatcher – FT/SSC
- Least Bell’s vireo – FE/SE
- Southwestern willow flycatcher – FE/SE
- Sensitive plants
- Riparian, wetland and vernal pool resources

Vegetation Communities/Habitat Classification Mapping

Vegetation community names and hierarchical structure follows the Preliminary Descriptions of the Terrestrial Natural Communities of California (Oberbauer et al. 2008).

Floristic Plant Inventory

A general plant survey was conducted throughout the Project Site during the initial reconnaissance in a collective effort to identify all species occurring onsite.

All plants observed during the survey efforts were either identified in the field or collected and later identified using taxonomic keys. Plant taxonomy follows Hickman (1993). Scientific nomenclature and common names used in this report generally follow Roberts et al. (2004) or Baldwin et al. (2012) for updated taxonomy. Scientific names are included only at the first mention of a species; thereafter, common names alone are used.

Wildlife Resources Inventory

All animals identified during the reconnaissance survey by sight, call, tracks, scat, or other characteristic sign were recorded onto a 1:200 scale orthorectified color aerial photograph or documented using a global positioning system (GPS). In addition to species actually detected, expected use of the site by other wildlife was derived from the analysis of habitats on the site, combined with known habitat preferences of regionally occurring wildlife species.

Vertebrate taxonomy followed in this report is according to the Center for North American Herpetology (2021 for amphibians and reptiles), the American Ornithologists’

Union (1988 and supplemental) for birds, and Baker et al. (2003) for mammals. Both common and scientific names are used during the first mention of a species; common names only are used in the remainder of the text.

Regional Connectivity/Wildlife Movement Corridors

The analysis of wildlife movement corridors associated with the Project Site and immediate vicinity is based on information compiled from literature, analysis of the aerial photograph data, and direct observations made in the field during the reconnaissance site visit.

A literature review was conducted that includes documents on island biogeography (studies of fragmented and isolated habitat “islands”), reports on wildlife home range sizes and migration patterns, and studies on wildlife dispersal. Wildlife movement studies conducted in southern California were also reviewed. Use of field-verified digital data, in conjunction with the Geographic Information System (GIS) database, allowed proper identification of regional vegetation communities and drainage features. This information was crucial to assessing the relationship of the Project Site to large open space areas in the immediate vicinity and was also evaluated in terms of connectivity and habitat linkages. Relative to corridor issues, the discussions in this report are intended to focus on wildlife movement associated within the Project Site and the immediate vicinity.

Jurisdictional Resources Assessment

The Project Site was assessed for jurisdiction resources regulated by the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) in May 2021 to determine if a formal delineation was warranted.

3.0 EXISTING ENVIRONMENTAL SETTING

3.1 SURROUNDING LAND USES/TOPOGRAPHY/SOILS

The 2.50-acre Project Site is dominated by non-native grassland/ruderal and California buckwheat scrub vegetation which is described in this report and illustrated in Figure 3, *Vegetation Communities Map*, and Figures 4-5, *Current Project Site Photographs*.

The Project Site slopes from the west (840 ft. elevation) to approximately 740 ft. elevation along the eastern property boundary. Soils mapped by the Soil Conservation Service (SCS)¹ within the Project Site consist sandy and loam substrates (NRCS 2021). The Soil Survey of the San Diego Area has the following soil mapped within the boundary of the property as illustrated in Figure 6, *Soils Association Map*:

- Fallbrook sandy loam 9 to 15 percent slopes eroded (FaD2)
- Fallbrook sandy loam 15 to 30 percent slopes eroded (FaE2)

¹ SCS is now known as the National Resource Conservation Service (NRCS).

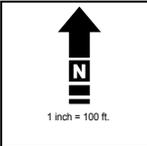


Vegetation Communities

NNG	Non-native Grassland/Ruderal
CBS	California Buckwheat Scrub
ORN	Ornamental Landscaping
BES	Blue Elderberry Shrub
LS	Laurel Sumac Shrub
DIS	Disturbed

Project Site Boundary

Figure 3 - Vegetation Communities Map
 Biological Resources Technical Report
 APN 238-071-023 - Calle Catalina Residential Subdivision





PHOTOGRAPH 1 - Southwest view of eastern region of Project Site from northeast corner adjacent to Gamble Lane.



PHOTOGRAPH 2 - Northwest view of eastern region of Project Site from southeast corner.

Figure 4 - Current Project Site Photographs

Biological Resources Technical Report

APN 238-071-023 - Calle Catalina Residential Subdivision



PHOTOGRAPH 3 - Westward view of southern alley between east and west regions of Project Site.



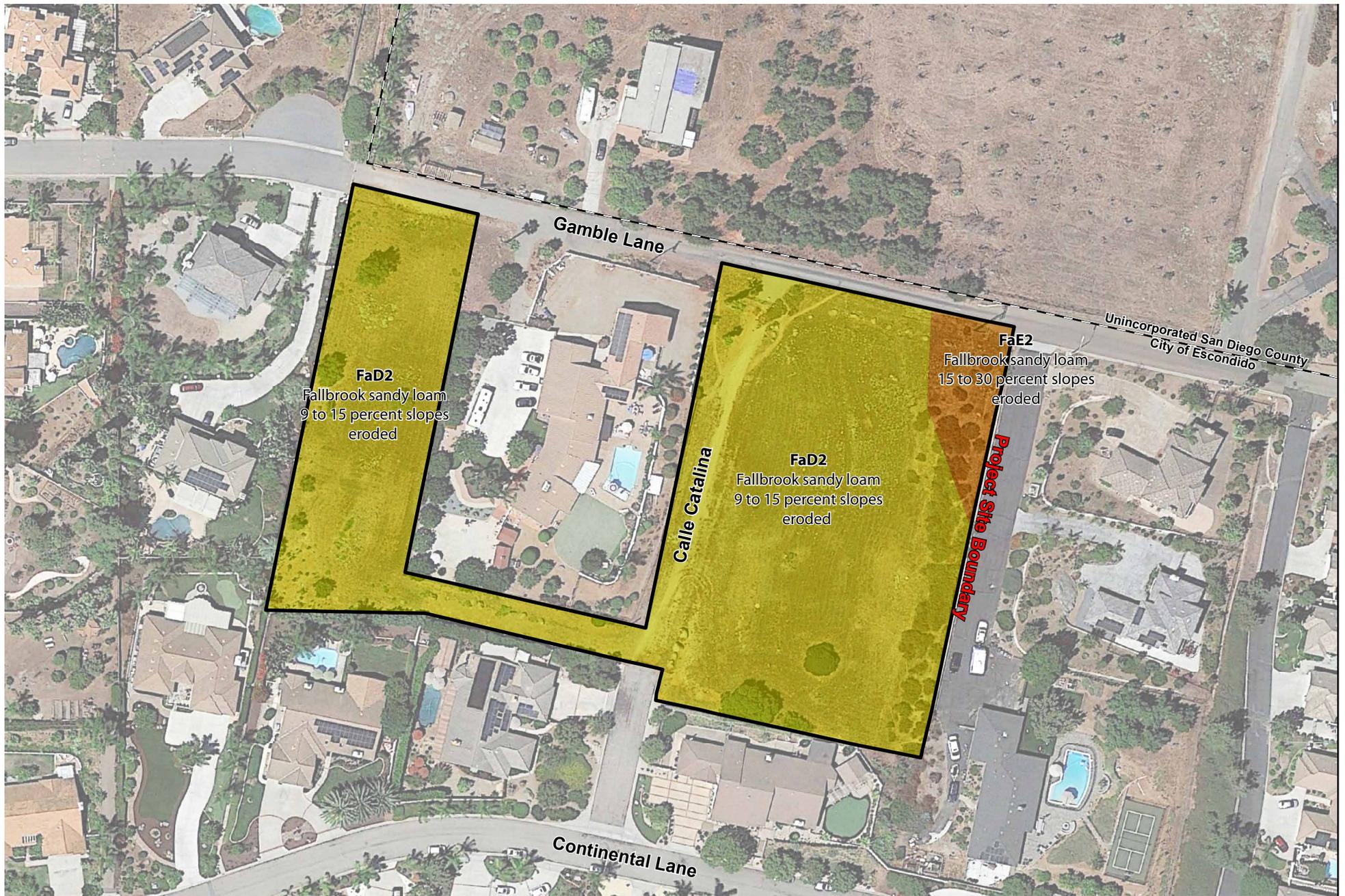
PHOTOGRAPH 4 - Southward view of western region of Project Site from Gamble Lane.

Figure 5 - Current Project Site Photographs

Biological Resources Technical Report

APN 238-071-023 - Calle Catalina Residential Subdivision





Project Site Boundary

Figure 6 - Soils Association Map

Biological Resources Technical Report

APN 238-071-023 - Calle Catalina Residential Subdivision



1 inch = 100 ft.

3.2 VEGETATION COMMUNITIES

Vegetation community names and hierarchical structure follows the Preliminary Descriptions of the Terrestrial Natural Communities of California (Oberbauer et al. 2008).

Non-native Grassland/Ruderal

The majority of the Project Site is characterized as non-native grassland/ruderal dominated by ripgut grass (*Bromus diandrus*), wild oat (*Avena fatua*), slender wild oat (*Avena barbata*), and foxtail chess (*Bromus madritensis* ssp. *rubens*). Ruderal species documented within this vegetation community include horehound (*Marrubium vulgare*), red stemmed filaree (*Erodium cicutarium*), wild radish (*Raphanus sativus*), and scarlet pimpernel (*Lysimachia arvensis*). Native species detected within this habitat type and commonly found in association within this vegetation community include American bird's foot trefoil (*Acmispon americanus*), telegraph weed (*Heterotheca grandiflora*), and turkey-mullein (*Croton setiger*).

California Buckwheat Scrub

A narrow patch of California buckwheat scrub extends along the eastern boundary and is dominated by California buckwheat (*Eriogonum fasciculatum*). Less common species detected within this vegetation community include deerweed (*Acmispon glaber*), and coast goldenbush (*Isocoma menziesii*).

Disturbed

Disturbed regions of the Project Site are either devoid of vegetation or possess a scattered distribution of non-native species including black mustard (*Brassica nigra*), tocalote (*Centaurea melitensis*), castor bean (*Ricinus communis*) and horseweed (*Erigeron canadensis*).

Ornamental Landscaping

A few ornamental shrub, tree and palms are located within the non-native grassland/ruderal vegetation including avocado (*Persea americana*), Mexican fan palm (*Washingtonia robusta*), ash (*Fraxinus* sp.), northern California walnut (*Juglans hindsii*), sea lavender (*Limonium perezii*), and citrus.

Native Shrub & Tree

Two native species including a laurel sumac (*Malosma laurina*), and blue elderberry (*Sambucus cerulea*) were documented within the non-native grassland/ruderal vegetation community.

**Table 1.
Project Site Vegetation Community Acreages**

Vegetation Community	Project Site Onsite (ac)
Non-native Grassland/Ruderal	1.94
Disturbed	0.25
California Buckwheat Scrub	0.23
Ornamental Landscaping	0.05
Native Shrubs	0.03
TOTAL	2.50

Source: Cadre Environmental 2021.

3.3 GENERAL PLANT & WILDLIFE SPECIES

General plant species documented within the Project Site are presented in the previous section.

General wildlife species documented onsite or within the vicinity during the site assessment include red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaida macroura*), Anna’s hummingbird (*Calypte anna*), say’s phoebe (*Sayornis saya*), black phoebe (*Sayornis nigricans*), cliff swallow (*Petrochelidon pyrrhonota*), house finch (*Carpodacus mexicanus*), white-crowned sparrow (*Zonotrichia leucophrys*), house sparrow (*Passer domesticus*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), and desert cottontail (*Sylvilagus audubonii*).

3.4 JURISDICTIONAL RESOURCES ASSESSMENT

No wetlands, riparian habitat or vernal pools regulated by the USACE, CDFW, or RWQCB were documented within or immediately adjacent to the Project Site.

4.0 SENSITIVE BIOLOGICAL RESOURCES

The following discussion describes the plant and wildlife species present, or potentially present within the property boundaries, that have been afforded special recognition by federal, state, or local resource conservation agencies and organizations, principally due to the species’ declining or limited population sizes, usually resulting from habitat loss. Also discussed are habitats that are unique, of relatively limited distribution, or of particular value to wildlife. Protected sensitive species are classified by state and/or federal resource management agencies, or both, as threatened or endangered, under provisions of the state and federal endangered species act. Vulnerable or “at-risk” species that are proposed for listing as threatened or endangered (and thereby for protected status) are categorized administratively as "candidates" by the USFWS. CDFW uses various terminology and classifications to describe vulnerable species. There are additional sensitive species classifications applicable in California. These are described below.

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, USFWS, and special groups like the CNPS maintain watch lists of such resources. For the purpose of this assessment sources used to determine the sensitive status of biological resources are:

Plants: USFWS (2020), CNDDDB (CDFW 2021a), CDFW (2021d, 2021e), CNPS (2021), City of Escondido Draft Subarea Plan (2001), and Skinner and Pavlik (1994),

Wildlife: California Wildlife Habitat Relationships (2008), USFWS (2020), CNDDDB (CDFW 2021a), City of Escondido Draft Subarea Plan (2001), and CDFW (2021b, 2021c).

Habitats: CNDDDB (CDFW 2021a, 2021f, 2021g), and City of Escondido Draft Subarea Plan (2001).

4.1 FEDERAL PROTECTION AND CLASSIFICATIONS

The Federal Endangered Species Act of 1973 (FESA) defines an endangered species as “any species that is in danger of extinction throughout all or a significant portion of its range...” Threatened species are defined as “any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.” Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to “take” any listed species. “Take” is defined as follows in Section 3(18) of the FESA: “...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Further, the USFWS, through regulation, has interpreted the terms “harm” and “harass” to include certain types of habitat modification as forms of a “take.” These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants. Recently, the USFWS instituted changes in the listing status of former candidate species. Former C1 (candidate) species are now referred to simply as candidate species and represent the only candidates for listing. Former C2 species (for which the USFWS had insufficient evidence to warrant listing at this time) and C3 species (either extinct, no longer a valid taxon or more abundant than was formerly believed) are no longer considered as candidate species. Therefore, these species are no longer maintained in list form by the USFWS, nor are they formally protected. However, some USFWS field offices have issued memoranda stating that former C2 species are henceforth to be considered Federal Species of Concern. This term is employed in this document, but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS.

For purposes of this assessment, the following acronyms are used for federal status species:

FE	Federal Endangered
FT	Federal Threatened
FPE	Federal Proposed Endangered
FPT	Federal Proposed Threatened
FC	Federal Candidate for Listing

The designation of critical habitat can also have a significant impact on the development of land designated as “*critical habitat*.” The FESA prohibits federal agencies from taking any action that will “*adversely modify or destroy*” critical habitat (16 U.S.C. § 1536(a)(2)). This provision of the FESA applies to the issuance of permits by federal agencies. Before approving an action affecting critical habitat, the federal agency is required to consult with the USFWS who then issues a biological opinion evaluating whether the action will “*adversely modify*” critical habitat. Thus, the designation of critical habitat effectively gives the USFWS extensive regulatory control over the development of land designated as critical habitat.

The Migratory Bird Treaty Act of 1918 (MBTA) makes it unlawful to “*take*” any migratory bird or part, nest, or egg of such bird listed in wildlife protection treaties between the United States and Great Britain, the Republic of Mexico, Japan, and the Union of Soviet States. For purposes of the MBTA, “*take*” is defined as to pursue, hunt, capture, kill, or possess or attempt to do the same.

The Bald Eagle and Golden Eagle Protection Act explicitly protects the bald eagle and golden eagle and imposes its own prohibition on any taking of these species. As defined in this act, take means to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb. Current USFWS policy is not to refer the incidental take of bald eagles for prosecution under the Bald Eagle and Golden Eagle Protection Act (16 U.S.C. 668-668d).

4.2 STATE PROTECTION AND CLASSIFICATIONS

California's Endangered Species Act (CESA) defines an endangered species as “...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.” The State defines a threatened species as “...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.” Candidate species are defined as “...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.” Candidate species may be

afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike FESA, CESA does not include listing provisions for invertebrate species.

Article 3, Sections 2080 through 2085, of CESA addresses the taking of threatened or endangered species by stating “No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided...” Under CESA, “take” is defined as “...hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Exceptions authorized by the state to allow “take” require “...permits or memorandums of understanding...” and can be authorized for “...endangered species, threatened species, or candidate species for scientific, educational, or management purposes.” Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

Additionally, some sensitive mammals and birds are protected by the State as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. CSC (“special” animals and plants) listings include special status species, including all state and federal protected and candidate taxa, Bureau of Land Management (BLM) and US Forest Service (USFS) sensitive species, species considered to be declining or rare by the CNPS or National Audubon Society, and a selection of species which are considered to be under population stress but are not formally proposed for listing. This list is primarily a working document for the CDFW's CNDDDB project. Informally listed taxa are not protected per se, but warrant consideration in the preparation of biotic assessments. For some species, the CNDDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites.

For the purposes of this assessment, the following acronyms are used for State status species:

SE	State Endangered
ST	State Threatened
SCE	State Candidate Endangered
SCT	State Candidate Threatened
SFP	State Fully Protected
SP	State Protected
SR	State Rare
SSC	California Species of Special Concern
SWL	California Watch List

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In addition, under California Fish and Game Code Section 3503.5, “it is unlawful to take, possess, or destroy any birds in the orders Falconiformes

or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto”. Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in the State. This organization has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of rare, threatened, or endangered vascular plant species of California (Tibor 2001). The list serves as the candidate list for listing as threatened and endangered by CDFW. The CNPS has developed five categories of rarity (CRPR):

CRPR 1A	Presumed extinct in California.
CRPR 1B	Rare, threatened, or endangered in California and elsewhere.
CRPR 2A	Plants presumed extirpated in California but common elsewhere
CRPR 2B	Plants rare, threatened, or endangered in California but more common elsewhere
CRPR 3	Plants about which we need more information – a review list.
CRPR 4	Species of limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear to be susceptible to threat.

As stated by the CNPS:

“Threat Rank is an extension added onto the California Rare Plant Rank and designates the level of endangerment by a 1 to 3 ranking with 1 being the most endangered and 3 being the least endangered. A Threat Rank is present for all California Rare Plant Rank 1B’s, 2’s, 4’s, and the majority of California Rare Plant Rank 3’s. California Rare Plant Rank 4 plants are seldom assigned a Threat Rank of 0.1, as they generally have large enough populations to not have significant threats to their continued existence in California; however, certain conditions exist to make the plant a species of concern and hence be assigned a California Rare Plant Rank. In addition, all California Rare Plant Rank 1A (presumed extinct in California), and some California Rare Plant Rank 3 (need more information) plants, which lack threat information, do not have a Threat Rank extension.” (CNPS 2021)

0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Fairly threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

0.3	Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)
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4.3 LOCAL PROTECTION AND CLASSIFICATIONS

The City of Escondido’s Unadopted Draft Subarea Plan (Table 1-1, Proposed Covered Species for the Escondido Subarea Plan) proposes coverage of a total of twenty-five (25) sensitive plant, five (5) invertebrate, and thirty (30) wildlife species. As stated by the City of Escondido:

“The Escondido Subarea Plan comprehensively addresses how the city of Escondido, California (city), will conserve natural biotic communities and sensitive plant and wildlife species pursuant to the California Natural Community Conservation Planning (NCCP) Act of 1991 and the California and U.S. Endangered Species Acts (CESA and ESA). This plan is an NCCP and a Habitat Conservation Plan (HCP) pursuant to Section 10(a) of the U.S. Endangered Species Act (as amended in 1982). Thus, approval and adoption of this plan will result in issuance of federal and state authorizations for the take of listed rare, threatened, or endangered species. These authorizations will be granted to the city by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), collectively referred to as the wildlife agencies. The city, in turn, may then authorize the taking of natural habitats or associated species by public or private projects within its jurisdiction, so long as those biological resources are adequately conserved by the plan and the projects resulting in their taking are consistent with and covered by the provisions of this plan.” (City of Escondido 2001)

4.4 SENSITIVE HABITATS

As stated by CDFW:

“One purpose of the vegetation classification is to assist in determining the level of rarity and imperilment of vegetation types. Ranking of alliances according to their degree of imperilment (as measured by rarity, trends, and threats) follows NatureServe’s Heritage Methodology, in which all alliances are listed with a G (global) and S (state) rank. For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled” (CDFW 2021)

No CDFW sensitive habitats were documented within or adjacent to the Project Site.

4.5 SENSITIVE PLANTS

A comprehensive assessment of sensitive plant species known to occur within the region and the potential for occurrence within the Project Site is presented in Table 2, *Sensitive Plant Species Listed as Occurring or Potentially Occurring in the City of*

Escondido (City of Escondido 2001, Table 3-2 MHCP Species Occurring or Potentially Occurring in Escondido).

**Table 2.
Sensitive Plant Species Listed as Occurring or Potentially Occurring in the
City of Escondido.**

Common Name <i>Scientific Name</i>	Listing Status	Comments
Blochman's Dudleya <i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	CRPR 1B.1	Occurs in rocky, clay substrates in coastal sage, chaparral and grassland habitats. Not expected to occur onsite based on a lack of suitable soils and observations.
California Orcutt Grass <i>Orcuttia californica</i>	FE/SE CRPR 1B.1	Occurs in vernal pools. Not expected to occur onsite based on a lack of suitable habitat, soils, and observations.
Cliff Spurge <i>Euphorbia misera</i>	CRPR 2B.2	Perennial scrub. Not expected to occur onsite based on a lack of suitable soils and observations.
Del Mar Manzanita <i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>	FE CRPR 1B.1	Occurs in maritime chaparral habitat. Not expected to occur onsite based on a lack of suitable habitat, soils, and observations.
Del Mar Mesa Sand Aster <i>Corethrogyne filaginifolia</i> var. <i>linifolia</i>	CRPR 1B.1	Occurs in sandy coastal bluff, chaparral and coastal sage scrub habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.
Encinitas Baccharis <i>Baccharis vanessae</i>	FT/SE CRPR 1B.1 NE	Occurs in sandstone maritime chaparral habitat. Not expected to occur onsite based on a lack of suitable habitat, soils, and observations.
Engelmann Oak <i>Quercus engelmannii</i>	CRPR 4.2	Not detected onsite.
Little Mouseltail <i>Myosurus minimus</i> ssp. <i>apus</i>	CRPR 3.1	Occurs in alkaline vernal pool habitat. Not expected to occur onsite based on a lack of suitable habitat and soils.
Nuttall's Lotus <i>Lotus nuttallianus</i>	CRPR 1B.1	Occurs in coastal dunes Not expected to occur onsite based on a lack of suitable habitat and soils.
Nuttall's Scrub Oak <i>Quercus dumosa</i>	CRPR 1B.1	Not detected onsite.
Orcutt's Brodiaea <i>Brodiaea orcuttii</i>	CRPR 1B.1	Occurs in clay soils within chaparral, meadow, grassland, and vernal pool habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.

Common Name <i>Scientific Name</i>	Listing Status	Comments
Orcutt's Hazardia <i>Hazardia orcuttii</i>	ST CRPR 1B.1	Occurs in clay substrates within maritime chaparral and coastal sage scrub habitats. Not expected to occur onsite based on a lack of suitable soils.
Orcutt's Spineflower <i>Chorizanthe orcuttiana</i>	FE/SE CRPR 1B.1	Occurs in sandy openings within maritime chaparral and coastal sage scrub habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.
Parry's Tetracoccus <i>Tetracoccus dioicus</i>	CRPR 1B.2	Perennial deciduous shrub. Not detected onsite.
San Diego Ambrosia <i>Ambrosia pumila</i>	FE CRPR 1B.1	Occurs in sandy loam or clay substrates within chaparral, coastal sage scrub, vernal pool and grassland habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.
San Diego Barrel Cactus <i>Ferocactus viridescens</i>	CRPR 2B.1	Not detected onsite.
San Diego Button-Celery <i>Eryngium aristulatum</i> var. <i>parishii</i>	FE/SE CRPR 1B.1	Occurs within mesic coastal scrub, grassland and vernal pool habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.
San Diego Goldenstar <i>Muilla clevelandii</i>	CRPR 1B.1	Occurs in clay substrates within chaparral, coastal scrub, grassland and vernal pool habitats. Not expected to occur onsite based on a lack of suitable soils.
San Diego Marsh Elder <i>Iva hayesiana</i>	CRPR 2B.2	Perennial herb occurs in marshes and playas. Not expected to occur onsite based on a lack of suitable habitat, soils, and observations.
San Diego Thorn-mint <i>Acanthomintha ilicifolia</i>	FT/SE CRPR 1B.1 NE	Occurs in clay substrates within chaparral, coastal scrub, grassland and vernal pool habitats. Not expected to occur onsite based on a lack of suitable soils.
Short-leaved dudleya <i>Dudleya blochmaniae</i> ssp. <i>brevifolia</i>	SE CRPR 1B.1	Occurs in Torrey sandstone substrate. Not expected to occur onsite based on a lack of suitable soils.
Prostrate Navarretia <i>Navarretia prostrata</i>	CRPR 1B.1	Occurs within mesic playa and vernal pool habitats. Not expected to occur onsite based on a lack of suitable habitat and soils.

Common Name <i>Scientific Name</i>	Listing Status	Comments
Sticky Dudleya <i>Dudleya viscida</i>	CRPR 1B.2	Occurs in rocky habitats. Not expected to occur onsite based on a lack of suitable soils.
Summer Holly <i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>	CRPR 1B.2	Not detected onsite.
Thread-leaved Brodiaea <i>Brodiaea filifolia</i>	FT/SE CRPR 1B.1 NE	Occurs is clay substrates within chaparral, coastal scrub, playas, grassland and vernal pool habitats. Not expected to occur onsite based on a lack of suitable soils.
Torrey Pine <i>Pinus torreyana</i> ssp. <i>torreyana</i>	CRPR 1B.2	Not detected onsite.
Variiegated dudleya <i>Dudleya variegata</i>	CRPR 1B.2	Perennial herb which generally blooms from April to June within chaparral, cismontane woodland, coastal scrub, grassland and vernal pool habitats in association with clay substrates. Not expected to occur onsite based on a lack of suitable habitat and soils.
Wart-stemmed Ceanothus <i>Ceanothus verrucosus</i>	CRPR 2B.2	Not detected onsite.
<p>California Native Plant Society (CNPS): California Rare Plant Rank (CRPR) CRPR 1A – plants presumed extinct in California CRPR 1B – plants rare, threatened, or endangered in California, but more common elsewhere CRPR 2A – plants presumed extirpated in California but common elsewhere CRPR 2B – plants rare, threatened, or endangered in California but more common elsewhere CRPR 3 – plants about which we need more information, a review list CRPR 4 – plants of limited distribution, a watch list .1 – Seriously endangered in California .2 – Fairly endangered in California .3 – Not very endangered in California</p> <p>Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FC – Federal Candidate for Listing</p> <p>State (CDFW) Protection and Classification SE – State Endangered ST – State Threatened</p> <p>NE = MHCP Narrow Endemic</p>		

No suitable habitat for sensitive plant species proposed for coverage under the City of Escondido's Unadopted Draft Subarea Plan or MHCP narrow endemic species was detected onsite based on the lack of suitable habitat, soils and historic onsite disturbance.

4.6 SENSITIVE WILDLIFE

A comprehensive assessment of sensitive wildlife species known to occur within the region and the potential for occurrence within the Project Site is presented in Table 3,

Sensitive Wildlife Species Listed as Occurring or Potentially Occurring in the City of Escondido.

**Table 3.
Sensitive Wildlife Species Listed as Occurring or Potentially Occurring in the
City of Escondido**

Common Name <i>Scientific Name</i>	Listing Status	Comments
INVERTEBRATES		
Harbison's Dun Skipper <i>Euphyes vestries harbisoni</i>		Not expected to occur onsite based on a lack of host plant, San Diego sedge (<i>Carex spissa</i>).
Hermes Copper Butterfly <i>Lycaena hermes</i>	FC	Not expected to occur onsite based on a lack of host plant, spiny red berry (<i>Rhamnus crocea</i>).
Quino Checkerspot Butterfly <i>Euphydryas editha quino</i>	FE	Not expected to occur onsite based on a lack of cryptobiotic soil crusts and host plant including <i>Plantago erecta</i> , <i>Plantago patagonica</i> , <i>Antirrhinum coulterianum</i> , <i>Cordylanthus rigidus</i> , <i>Castilleja exserta</i> , and <i>Castilleja rigidus</i> .
Riverside Fairy Shrimp <i>Streptocephalus woottoni</i>	FE NE	Occurs in vernal pools and seasonal depressions. Not expected to occur onsite based on a lack of suitable habitat (vernal pools and seasonal depressions).
Salt Marsh (Wandering) Skipper <i>Panoquina errans</i>		Not expected to occur onsite based on a lack of saltmarsh habitat within or immediately adjacent to the project site.
San Diego Fairy Shrimp <i>Branchinecta sandiegoensis</i>	FE NE	Occurs in vernal pools and seasonal depressions. Not expected to occur onsite based on a lack of suitable habitat (vernal pools and seasonal depressions).
AMPHIBIANS/REPTILES		
Arroyo Toad <i>Anaxyrus californicus</i>	FE/SSC	Breeds in intermittent drainages and aestivates within floodprone areas and adjacent scrub and woodland habitats. Not expected to occur onsite based on a lack of suitable breeding and upland habitat. USFWS Permit 780566-14
California red-legged frog <i>Rana draytonii</i>	FT/SSC	Breeding sites of the California red-legged frog are in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons. Not expected to occur onsite based on a lack of suitable habitat.
Orange-throated Whiptail <i>Aspidoscelis hyperythra</i>	SSC	Not expected to occur onsite based on a lack of suitable habitat.
San Diego Horned Lizard <i>Phrynosoma coronatum blainvillei</i>	SSC	Not expected to occur onsite based on a lack of suitable habitat.

Common Name <i>Scientific Name</i>	Listing Status	Comments
Southwestern Pond Turtle <i>Actinemys marmorata pallida</i>	SSC	Occurs within and adjacent to creeks and open water. Not expected to occur onsite based on a lack of suitable habitat.
Western Spadefoot <i>Spea hammondi</i>	SSC	Breeds within vernal pools and seasonal depressions – aestivates in adjacent grassland habitats. Not expected to occur onsite based on a lack of suitable breeding and upland habitat.
BIRDS		
American Peregrine Falcon <i>Falco peregrinus anatum</i>	SFP	Typically breeds on cliffs. Not expected to occur onsite based on a lack of suitable nesting habitat.
Belding's Savannah Sparrow <i>Passerculus sandwichensis beldingi</i>	SE	Occurs within pickleweed dominated coastal marshes. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Bell's sage sparrow <i>Amphispiza belli belli</i>	SSC	Bell's sage sparrow is an uncommon to fairly common but localized resident breeder in dry chaparral and coastal sage scrub along the coastal lowlands. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Burrowing Owl <i>Athene cunicularia hypuaea</i>	SSC	No potential burrows documented within or adjacent to project site. Not expected to occur onsite based on a lack of suitable nesting/refugia habitat.
California Brown Pelican <i>Pelecanus occidentalis californicus</i>	SFP	Primarily occur along sea coast and are rarely found inland. Not expected to occur onsite based on a lack of foraging and nesting habitat.
California Least Tern <i>Sterna antillarum browni</i>	FE/SE/SWL SFP	Feeds and breeds in shallow estuaries or lagoons. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Coastal Cactus Wren <i>Campylorhynchus brunneicapillus sandiegensis</i>	SSC	The coastal cactus wren is associated with three species of cacti almost exclusively in thickets of cholla (<i>Opuntia prolifera</i>) and prickly pear (<i>Opuntia littoralis</i> and <i>Opuntia oricola</i>) dominated stands of coastal sage scrub below 457 meters in elevation on mesas and lower slopes of the coast ranges.

Common Name <i>Scientific Name</i>	Listing Status	Comments
		Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Coastal California Gnatcatcher <i>Polioptila californica californica</i>	FT/SSC	The coastal California gnatcatcher is a non-migratory bird species that primarily occurs within sage scrub habitats in coastal southern California dominated by California sagebrush (<i>Artemisia californica</i>), and California buckwheat (<i>Eriogonum fasciculatum</i>). Not expected to occur onsite based on the low-quality sparse cover and small patch .23-acre of buckwheat scrub. The species was not detected onsite by the USFWS permitted biologist – Permit 780566-14 during the site assessment.
Cooper's Hawk <i>Accipiter cooperii</i>	SWL	Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Elegant Tern <i>Sterna elegans</i>	SWL	Occurs near coast. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Golden Eagle <i>Aquila chrysaetos</i>	CWL, SFP	Within southern California, the species prefers grasslands, brushlands (coastal sage scrub and chaparral), deserts, oak savannas, open coniferous forests, and montane valleys. Not expected to forage onsite based on size of property or breed onsite based on a lack of suitable nesting habitat.
Grasshopper Sparrow <i>Ammodramus savannarum</i>	SSC	The grasshopper sparrow generally prefers moderately open grasslands and prairies with patchy bare ground. May occasional forage and breed within the non-native grassland/ruderal habitat within the Project Site.
Large-billed Savannah Sparrow <i>Passerculus sandwichensis rostratus</i>	SSC	Occurs in coastal marshes and beaches and does not breed in California. Not expected to occur onsite based on a lack of suitable habitat.
Least Bell's Vireo <i>Vireo bellii pusillus</i>	FE/SE	Occurs within riparian habitat. Not expected to occur onsite based on a lack of suitable nesting/foraging habitat.
Light-footed Clapper Rail <i>Rallus longirostris levipes</i>	FE/SE/SFP	Occurs within coastal salt marsh/lagoons in cordgrass and pickleweed. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.

Common Name <i>Scientific Name</i>	Listing Status	Comments
Long-Billed Curlew <i>Numenius americanus</i>	SWL	Occurs within cultivated lands, salt marshes and breeds in native grasslands adjacent to inundated areas. Not expected to occur onsite based on a lack of suitable nesting habitat.
Northern Harrier <i>Circus cyaneus</i>	SSC	May occasionally forage onsite. Not expected to breed onsite based on a lack of suitable nesting habitat.
Osprey <i>Pandion haliaetus</i>	SWL	Occurs near lakes and ponds. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Southern California Rufous-crowned Sparrow <i>Aimophila ruficeps canescens</i>	CWL	Southern California rufous-crowned sparrow is a non-migratory bird species that primarily occurs within sage scrub and grassland habitats and to a lesser extent chaparral sub-associations. Moderate potential to occur within and adjacent to the Project Site based on the presence of suitable habitat.
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i>	FE/SE	Occurs in riparian habitat. Not expected to occur onsite based on a lack of suitable nesting habitat.
Tri-colored blackbird <i>Agelaius tricolor</i>	ST/SSC	Often associated with open water, marshes, grasslands, and wetlands. Not expected to occur onsite based on a lack of suitable nesting and foraging habitat.
Western bluebird <i>(Sialia mexicana)</i>		Often associated with woodland habitats. Not expected to occur onsite based on a lack of suitable nesting and foraging habitat.
Western Snowy Plover <i>Charadrius alexandrinus nivosus</i>	FT/SSC	Nests on beaches and banks of lagoons and estuaries. Not expected to occur onsite based on a lack of suitable nesting habitat.
White-faced Ibis <i>Plegadis chihi</i>	SWL	Occurs in marsh habitats. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.
Yellow-breasted Chat <i>Icteria virens</i>	SSC	Occurs within riparian and adjacent scrub habitats. Not expected to occur onsite based on a lack of suitable foraging and nesting habitat.

Common Name <i>Scientific Name</i>	Listing Status	Comments
MAMMALS		
California mastiff-bat <i>Eumops perotis californicus</i>	SSC	Associated with woodlands, rocky habitats, cliffs, buildings, and tree cavities. Not expected to forage or roost onsite based on a lack of suitable habitat.
Mountain lion <i>Felis concolor</i>		Mountain lions use rocky areas, cliffs, and ledges that provide cover within open woodlands and chaparral, as well as riparian areas that provide protective habitat connections for movement between fragmented core habitats. Not expected to occur onsite based on a lack of observations and isolation of Project Site from adjacent open space.
Southern Mule deer <i>Odocoileus hemionus</i>		Prefer open grasslands and perk-lands, or forest edge ecosystems. Not expected to occur onsite based on a lack of observations and isolation of Project Site from adjacent open space.
Northwestern San Diego pocket mouse <i>Chaetodipus fallax fallax</i>	SSC	The northwestern San Diego pocket mouse occurs in coastal sage scrub, grassland ecotones, chaparral, and desert scrubs at all elevations up to 6,000 feet. Not expected to breed onsite based on a lack of suitable habitat.
Pacific Pocket Mouse <i>Perognathus longimembris pacificus</i>	FE/SSC	Occurs in river and marine alluvium. Not expected to occur onsite based on the lack of suitable soils and distance from the coast.
Stephens' Kangaroo Rat <i>Dipodomys stephensi</i>	FE/ST	No kangaroo rat burrows were documented onsite. Not expected to occur onsite based on a lack of suitable habitat.
San Diego Black-Tailed Jackrabbit <i>Lepus californicus bennettii</i>	SSC	Occurs in open scrub and grassland habitats. Not expected to occur onsite based on a lack of observations and isolation of Project Site from adjacent open space.
Townsend's western big-eared bat <i>Corynorhinus townsendii</i>	SSC	Associated with caves, mines, buildings. Not expected to forage or roost onsite based on a lack of suitable habitat.
Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FC – Federal Candidate for Listing State (CDFW) Protection and Classification SE – State Endangered SSC – State Species of Special Concern		

Common Name <i>Scientific Name</i>	Listing Status	Comments
CWL – California Watch List SPF – State Fully Protected NE = MHCP Narrow Endemic		

The Southern California rufous-crowned sparrow, grasshopper sparrow and northern harrier may occasionally utilize the Project Site for foraging and/or breeding as presented in Table 3, *Sensitive Wildlife Species Listed as Occurring or Potentially Occurring in the City of Escondido*.

The Project Site is not located within a USFWS designated critical habitat for any federally listed species.

4.7 REGIONAL CONNECTIVITY/WILDLIFE MOVEMENT CORRIDORS

Overview

Wildlife corridors link areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990). Corridors effectively act as links between different populations of a species. A group of smaller populations (termed “demes”) linked together via a system of corridors is termed a “metapopulation.” The long-term health of each deme within the metapopulation is dependent upon its size and the frequency of interchange of individuals (immigration vs. emigration). The smaller the deme, the more important immigration becomes, because prolonged inbreeding with the same individuals can reduce genetic variability. Immigrant individuals that move into the deme from adjoining demes mate with individuals and supply that deme with new genes and gene combinations that increases overall genetic diversity. An increase in a population’s genetic variability is generally associated with an increase in a population’s health.

Corridors mitigate the effects of habitat fragmentation by:

- (1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity;
- (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and
- (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover). A number of terms have been used in various wildlife movement studies, such as “wildlife corridor”, “travel route”, “habitat linkage”, and “wildlife crossing” to refer to areas in which wildlife moves from one area to another. To clarify the meaning of these terms and facilitate the discussion on wildlife movement in this study, these terms are defined as follows:

Travel Route: A landscape feature (such as a ridge line, drainage, canyon, or riparian strip) within a larger natural habitat area that is used frequently by animals to facilitate movement and provide access to necessary resources (e.g., water, food, cover, den sites). The travel route is generally preferred because it provides the least amount of topographic resistance in moving from one area to another; it contains adequate food, water, and/or cover while moving between habitat areas; and provides a relatively direct link between target habitat areas.

Wildlife Corridor: A piece of habitat, usually linear in nature, that connects two or more habitat patches that would otherwise be fragmented or isolated from one another. Wildlife corridors are usually bounded by urban land areas or other areas unsuitable for wildlife. The corridor generally contains suitable cover, food, and/or water to support species and facilitate movement while in the corridor. Larger, landscape-level corridors (often referred to as “habitat or landscape linkages”) can provide both transitory and resident habitat for a variety of species.

Wildlife Crossing: A small, narrow area, relatively short in length and generally constricted in nature, that allows wildlife to pass under or through an obstacle or barrier that otherwise hinders or prevents movement. Crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. These are often “choke points” along a movement corridor.

Wildlife Movement within Project Site

The Project Site is bordered by existing rural and high-density residential development and does not represent a travel route, wildlife corridor or wildlife crossing route based on the definitions provided above.

The Project Site is not located within or adjacent to a Biological Core and Linkage Area (City of Escondido 2001).

5.0 REGIONAL AND REGULATORY SETTING

The following section describes the project compliance with local federal and state regulations.

5.1 LOCAL

Multiple Habitat Conservation Program

Under the California NCCP Act, the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista participated in the preparation of the MHCP, a comprehensive plan that addresses the needs of multiple plant and animal species in northwestern San Diego County. The MHCP Subregional Plan was adopted and certified by the San Diego Association of Governments (SANDAG) Board of Directors in March 2003. The intent is that each jurisdiction will implement their respective portions of the MHCP Plan through citywide “subarea” plans, which describe the specific policies each City will institute for the MHCP.

Habitat Management Plan for Natural Communities in the City of Escondido

As stated by the City of Escondido:

“Escondido is one of seven cities in northwestern San Diego County which together comprise an NCCP subregion. As such, the city of Escondido (city) has been involved in the subregional Multiple Habitat Conservation Program (MHCP) from its inception in 1991. This subarea plan represents the city’s contribution to the MHCP and to regional NCCP conservation goals. The city has prepared this subarea plan to direct the conservation of natural biotic communities and sensitive plant and animal species within the city pursuant to the California Natural Community Conservation Planning (NCCP) Act of 1991 and the California and U.S. Endangered Species Acts (CESA and ESA). This plan is an NCCP and a Habitat Conservation Plan (HCP) pursuant to Section 10(a) of the U.S. Endangered Species Act (as amended in 1982). Approval and adoption of this plan in conjunction with the drafting and approval of an implementing agreement and an adaptive management and monitoring plan will result in federal and state authorization for incidental take of sensitive species caused by implementation of public and private projects within the city. This plan provides regulatory certainty to landowners within the city and will aid considerably in conserving the region’s biodiversity and enhancing the overall quality of life for residents within this region of southern California. The plan was based on the best available scientific data and principles of conservation biology and addresses the potential impacts to natural habitats and potential species endangerment due to projects within the city. The plan also institutes a strategy to proactively mitigate these impacts to the city’s biological resources. This comprehensive and proactive approach provides local landowners and agencies greater certainty for economic development and conserves biological resources more effectively than the

former, piecemeal approach to species protection and mitigation. The plan provides direct economic benefits by eliminating current restrictions to development that result from the uncoordinated application of federal and state resource protection laws on a project-by-project basis.” (City of Escondido 2001)

Escondido Unadopted SubArea Plan Public Review Draft

The Project Site is not located within or adjacent to a hardline/softline FPA, constrained land outside of an FPA (wetland, slopes > 35%), or BCLA.

Special Status Species

No suitable habitat for sensitive plant species proposed for coverage under the City of Escondido’s Unadopted Draft Subarea Plan or MHCP narrow endemic species was detected onsite based on the lack of suitable habitat, soils and historic onsite disturbance.

The Southern California rufous-crowned sparrow, grasshopper sparrow and northern harrier (MHCP covered and proposed Escondido Unadopted Draft Subarea Plan covered species) may occasionally utilize the Project Site for foraging and/or breeding. The proposed minor subdivision may result in direct impacts to these special status species. The proposed action includes the minor subdivision of APN 238-071-023 including grading (pad development) and right-of-way road construction (Calle Catalina) for three (3) separate residential lots.

5.2 FEDERAL

Federal Endangered Species Act

The City of Escondido’s Draft SubArea Plan when adopted will serve as an HCP pursuant to Section 10(a)(1)(B) of the FESA of 1973, allowing participating jurisdictions to authorize "take" of plant and wildlife species. The MHCP has been issued under this Section and provides incidental take for all covered species.

Clean Water Act

The USACE Regulatory Program regulates activities pursuant to Section 404 of the federal CWA.

Although not expressly defined it is assumed that the USACE Manual (Environmental Laboratory 1987) for delineating wetlands should be used in determining the presence of wetland indicators in vernal pools. With the exception of wetlands created for the purpose of providing wetlands habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating characteristics as described above which are artificially created are not included in these definitions.

As stated by the USACE: "(a) The term *waters of the United States* means, (1) all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; (2) all interstate waters including interstate wetlands; and (3) all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters" (33 C.F.R. § 328.3).

The USACE generally takes jurisdiction within rivers and streams to the "ordinary high water mark," determined by erosion, the deposition of vegetation or debris, and changes in vegetation or soil characteristics (33 C.F.R. § 328.4). However, if there is no federal nexus to navigable waters, these waters are considered "isolated" and thus not subject to their jurisdiction.

Migratory Bird Treaty and Bald and Golden Eagle Protection Acts

Migratory birds including resident raptors and passerines are protected under the federal MBTA. The MBTA of 1918 implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico (1936), Japan (1972) and the Union of Soviet Socialist Republics (1976) further expanded the scope of international protection of migratory birds. Each new treaty has been incorporated into the MBTA as an amendment and the provisions of the new treaty are implemented domestically. These four treaties and their enabling legislation, the MBTA, established Federal responsibilities for the protection of nearly all species of birds, their eggs and nests.

The MBTA makes it illegal for people to "take" migratory birds, their eggs, feathers or nests. Take is defined in the MBTA to include by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing or transporting any migratory bird, nest, egg, or part thereof. The Bald and Golden Eagle Protection Act affords additional protection to all bald and golden eagles.

5.3 STATE

California Endangered Species Act

The CESA is similar to FESA in that it contains a process for listing of species regulating potential impacts to listed species. Section 2081 of the CESA authorizes the CDFW to enter into a memorandum of agreement for take of listed species for scientific, educational, or management purposes. The MHCP serves as an HCP pursuant the Natural Communities Conservation Plan (NCCP) under the NCCP Act of 2001, allowing participating jurisdictions to authorize "take" of plant and wildlife species.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) enacted a process by which plants are listed as rare or endangered. The NPPA regulates collection, transport, and commerce in plants

that are listed. The CESA follows the NPPA and covers both plants and wildlife determined to be threatened with extinction or endangered. Plants listed as rare under the NPPA are designated as threatened under the CESA.

Porter-Cologne Water Quality Control Act

The RWQCB regulates activities pursuant to Section 401(a)(1) of the federal CWA as well as the Porter Cologne Water Quality Control Act of 1969 (California Water Code section 13260). Section 401 of the CWA specifies that certification from the State is required for any applicant requesting a federal license or permit to conduct any activity including but not limited to the construction or operation of facilities that may result in any discharge into navigable waters. The certification shall originate from the State in which the discharge originates or will originate, or, if appropriate, from the interstate water pollution control agency having jurisdiction over the navigable water at the point where the discharge originates or will originate. Any such discharge will comply with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the CWA. The Porter Cologne Act requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the waters of the state to file a report of discharge (an application for waste discharge requirements (WDRs))" (Water Code § 13260(a)(1)). Discharge of fill material into "waters" of the State which does not fall under the jurisdiction of the USACE pursuant to Section 404 of the CWA may require authorization through application for WDRs or through waiver of WDRs.

Streambed Alteration Agreement

The CDFW regulates activities within streambeds, lakes, and wetlands pursuant to Division 2, Chapter 6, Section 1600 of the California Fish and Game Code (Streambed Alteration) and has jurisdiction of "waters" of the State. Regulated activities are those that "will substantially divert, obstruct, or substantially change the natural flow or bed, channel or bank of any river, stream, or lake or extends to the limit of the adjacent riparian vegetation designated by the department in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit." (California. Fish & Wildlife Code, § 1602).

California Fish and Game Code 3503 and 3513

As stated by CDFW:

"CHAPTER 1. General Provisions [3500 - 3516] (Chapter 1 enacted by Stats. 1957, Ch. 456.) It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. (Amended by Stats. 1971, Ch. 1470.)"

6.0 ENVIRONMENTAL IMPACTS

The following sections include an analysis of the direct impacts, indirect impacts, and cumulative effects of the proposed action (minor subdivision) on sensitive biological resources. This analysis characterizes the project related activities that are anticipated to adversely impact the species, and when feasible, quantifies such impacts. Direct effects are defined as actions that may cause an immediate effect on the species or its habitat, including the effects of interrelated actions and interdependent actions. Indirect effects are caused by or result from the proposed actions, are later in time, and are reasonably certain to occur. Indirect effects may occur outside of the area directly affected by the proposed action.

Cumulative impacts refer to incremental, individual environmental effects of two or more projects when considered together. These impacts taken individually may be minor but may be collectively significant. Cumulative effects include future tribal, local, or private actions that are reasonably certain to occur in the proposal vicinity considered in this report. A cumulative impact to biological resources may occur if a project has the potential to collectively degrade the quality of the environment, substantially reduce the habitat of wildlife species or cause a population to drop below self-sustaining levels, thereby threatening to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species.

6.1 THRESHOLD OF SIGNIFICANCE

The environmental impacts relative to biological resources are assessed using impact significance criteria which mirror the policy statement contained in the CEQA at Section 21001 (c) of the Public Resources Code. This section reflects that the legislature has established it to be the policy of the state to:

“Prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities...”

The following definitions apply to the significance criteria for biological resources:

- “*Endangered*” means that the species is listed as endangered under state or federal law.
- “*Threatened*” means that the species is listed as threatened under state or federal law.
- “*Rare*” means that the species exists in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens.
- “*Region*” refers to the area within southern California that is within the range of the individual species.

- “*Sensitive habitat*” refers to habitat for plants and animals (1) which plays a special role in perpetuating species utilizing the habitat on the property, and (2) without which there would be substantial danger that the population of that species would drop below self-perpetuating levels.
- “*Substantial effect*” means significance loss or harm of a magnitude which, based on current scientific data and knowledge, (1) would cause a species or a native plant or animal community to drop below self-perpetuating levels on a statewide or regional basis or (2) would cause a species to become threatened or endangered.

The proposed action includes the minor subdivision of APN 238-071-023 including grading (pad development) and right-of-way road construction (Calle Catalina) for three (3) separate residential lots.

Impacts to biological resources may result in a significant adverse impact if one or more of the following conditions would result from implementation of the proposed project.

- Have a substantial adverse effect, either directly or through habitat modification, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or Title 50, Code of Federal Regulations (Sections 17.11 or 17.12). No Impact.
- Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and meets the definition of Section 15380 (b), (c), or (d) of the CEQA Guidelines. Less than Significant with Mitigation.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS. No impact.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No impact.
- Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident migratory wildlife corridors, or impede the use of native nursery sites. No Impact.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact.
- Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state conservation plan. Less than Significant with Mitigation.

Also, the determination of impacts has been made according to the federal definition of “*take*”. FESA prohibits the “*taking*” of a member of an endangered or threatened wildlife species or removing, damaging, or destroying a listed plant species by any person (including private individuals and private or government entities). FESA defines “*take*”

as “to harass, harm, pursue, hunt, shoot, would, kill, trap, capture or collect” an endangered or threatened species, or to attempt to engage in these activities.

6.2 DIRECT IMPACTS

The proposed action includes the minor subdivision of APN 238-071-023 including grading (pad development) and right-of-way road construction (Calle Catalina) for three (3) separate residential lots.

Vegetation Communities

The proposed minor subdivision including pad development and construction of Calle Catalina right-of-way into three (3) residential lots would result in a total of 2.50-acres of direct impacts to native and disturbed habitats as shown in Figure 7, *Proposed Minor Subdivision and Impact Map*.

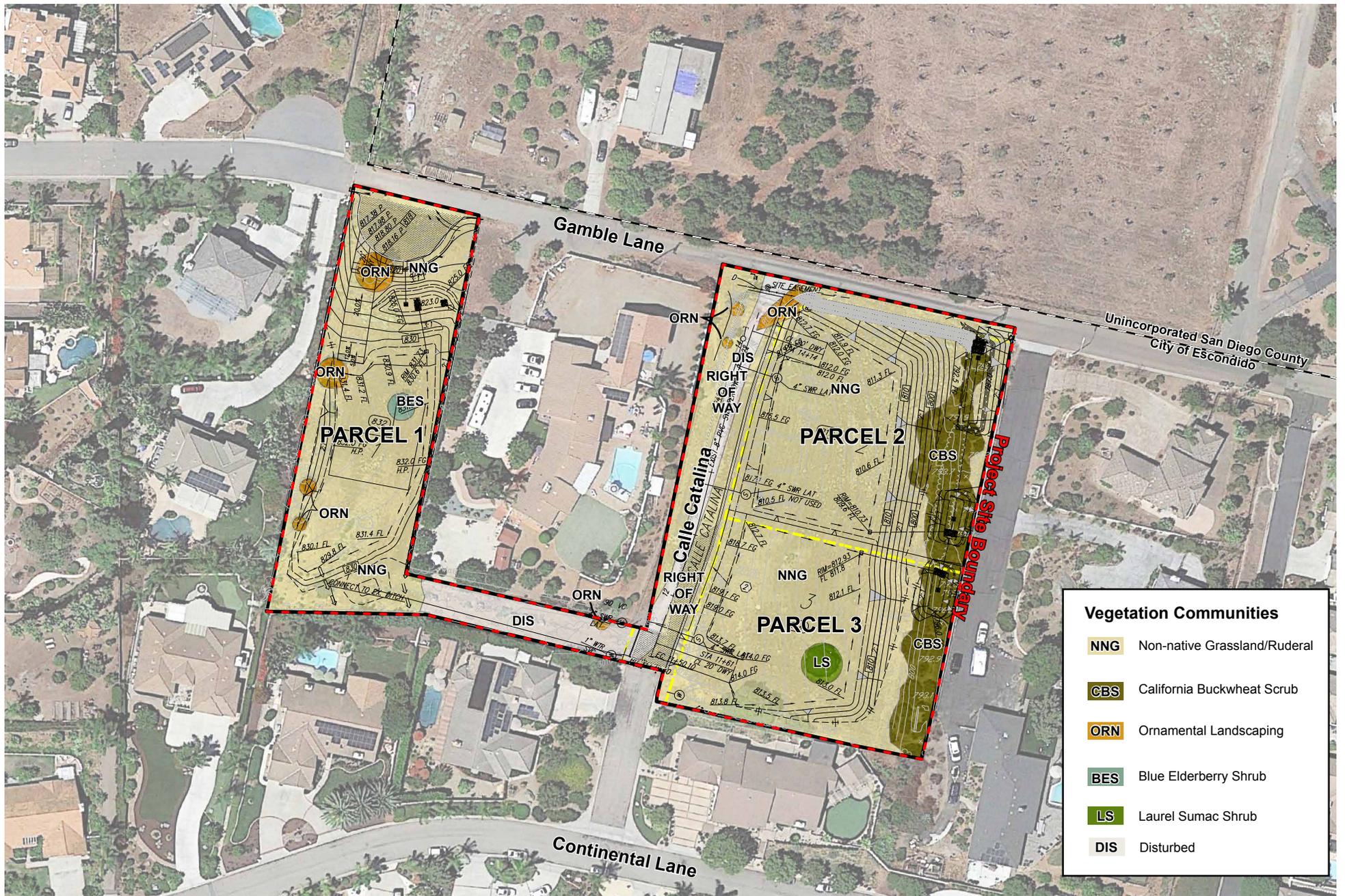
To ensure compliance with the City of Escondido’s Unadopted Draft Subarea Plan and General Plan (Section 5.2.1 Mitigation Standards for Vegetation Communities), direct impacts to non-native grassland/ruderal and California buckwheat scrub/native shrubs will be reduced to a level of less than significant through the purchase of credits at the Daley Ranch Conservation Bank for projects outside an FPA, as outlined in Table 4, *Potential Project Site Vegetation Community Impact Acreages and Mitigation* (Vegetation Communities Mitigation). Less than Significant with Mitigation.

Vegetation Communities Mitigation

Final project related mitigation obligations were based on an assessment of permanent impacts associated within the proposed subdivision and grading activities for three (3) residential development lots as outlined in the Escondido Unadopted Draft Subarea HCP Section 5.2.1, Mitigation Standards for Vegetation Communities. Prior to final project approval of a final map or grading permit, the applicant shall mitigate impacts to 1.94 acres of non-native grassland/ruderal and 0.26-acre of California buckwheat scrub/native shrubs by purchasing a total 1.49-acre of in-kind mitigation credits from the Daley Ranch Conservation Bank, as outlined in Table 4, *Project Site Vegetation Community Impact Acreages and Mitigation*. As stated by the City of Escondido:

“Table 5-2 contains mitigation standards for impacts to natural vegetation communities. Mitigation actions for unavoidable impacts should be selected from the following, arranged in order of preference: 1) If impact is located inside the FPA, onsite conservation and/or revegetation. 2) If offsite mitigation is required, then from Daley Ranch Conservation Bank, if applicable, then from within the city’s FPA.” (City of Escondido 2001)

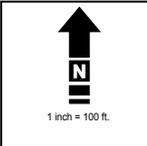
Proof of credit purchase will be submitted to the City of Escondido Planning Department and for review and approval.



Vegetation Communities	
NNG	Non-native Grassland/Ruderal
CBS	California Buckwheat Scrub
ORN	Ornamental Landscaping
BES	Blue Elderberry Shrub
LS	Laurel Sumac Shrub
DIS	Disturbed

Project Site Boundary
 Project Site Impact Boundary
 Project Site Proposed Subdivision Boundary

Figure 7 - Proposed Minor Subdivision and Impact Map
 Biological Resources Technical Report
 APN 238-071-023 - Calle Catalina Residential Subdivision



**Table 4.
Project Site Vegetation Community Impact Acreages and Mitigation**

Vegetation Community	Project Site Onsite (ac)	Habitat Group	Mitigation Ratio	Mitigation Acres (Credits)
Non-native Grassland/Ruderal	1.94	E	0.5:1	0.97
Disturbed	0.25	F	None	--
California Buckwheat Scrub	0.23	C	2:1	0.46
Ornamental Landscaping	0.05	F	None	--
Native Shrubs	0.03	C	2:1	0.06
TOTAL	2.50			1.49

*C = Coastal Sage Scrub, E = Annual Grassland, F = Other
Source: Cadre Environmental 2021.*

Sensitive Plants

No federal or state listed threatened/endangered plant species were detected or expected to occur within or adjacent to the Project Site.

No suitable habitat for sensitive plant species proposed for coverage under the City of Escondido’s Draft Subarea Plan or MHCP narrow endemic species was detected onsite. Based on the lack of suitable habitat, soils, historic onsite disturbance and/or historic occurrences onsite, MHCP narrow endemic plant species are not expected to be present and the proposed action would not result in a direct or indirect impact to sensitive plant species. A detailed description of the MHCP sensitive plant species assessment is presented in the following report and summarized in Table 2, *Sensitive Plant Species Listed as Occurring or Potentially Occurring in the City of Escondido*.

Sensitive Wildlife

No federal or state listed threatened/endangered wildlife species were detected or expected to occur within or adjacent to the Project Site.

The Southern California rufous-crowned sparrow, grasshopper sparrow and northern harrier (MHCP covered and proposed Escondido Unadopted Draft Subarea covered species) may occasionally utilize the Project Site for foraging and/or breeding. Impacts to 2.17-acre of suitable habitat (non-native grassland/ruderal and California buckwheat scrub) for these species listed as SSC and CWL would represent a less than significant impact and no mitigation is required. However, potential impacts to nesting of these three (3) sensitive bird species will be reduced to a level of less than significant following compliance with the City of Escondido’s standard condition of approval for potential impacts to nesting birds and raptors during the breeding season as described below (Nesting Bird Preconstruction Survey).

Nesting Bird Preconstruction Survey

Potential direct/indirect impacts to common/sensitive nesting bird or raptor species will require compliance with the CDFG Codes 3503 & 3513. Construction outside the

nesting season (between September 1st and February 1st) does not require pre-removal nesting bird surveys. If construction is proposed between February 1st and August 31st, a qualified biologist must conduct a nesting bird survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds or raptors within or directly adjacent (100 feet) to the Project Site.

The preconstruction survey(s) will focus on identifying any bird nests that may be directly or indirectly affected by construction activities. If active nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending on the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the City of Escondido prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a biological monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final report of the findings, prepared by a qualified biologist, shall be submitted to the City of Escondido prior to construction-related activities that have the potential to disturb any active nests during the nesting season. Any nest permanently vacated for the season would not warrant protection pursuant to the CDFG Codes 3503 & 3513.

Jurisdictional Resources

No wetlands, riparian habitat or vernal pools regulated by the USACE, CDFW, or RWQCB were documented within the Project Site. No Impact.

As warranted, any future project activities will be required to comply with all applicable water quality regulations including the National Pollutant Discharge Elimination System (NPDES) permit process. The implementation of applicable Best Management Practices (BMPs) during construction activities and the installation and proper maintenance of structural BMPs will ensure compliance with water quality regulations

6.3 INDIRECT IMPACTS

The proposed onsite impacts may result in indirect impacts to nesting bird and raptor species adjacent to the Project Site. Potential indirect impacts will be reduced to a level of less than significant following compliance with the City of Escondido's standard condition of approval for potential impacts to nesting birds and raptors during the breeding season as described in the previous section (Nesting Bird Preconstruction Survey).

6.4 CUMULATIVE IMPACTS

The proposed minor subdivision would not result in significant cumulative impacts (CEQA Section 15310) to environmental resources within the region of the Project Site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects.

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Certification *"I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge.*

Author: _____



Date: February 1st, 2022

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