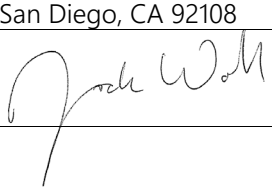
ATTACHMENT D.4

BIOLOGICAL RESOURCES LETTER REPORT

RECON

An Employee-Owned Company

Project Name and Number:	Santa Fe Flores Townhomes (modified project; GPA25-0001; R25-0001; MFSDP25-0001; TSM25-0001)
Report:	Biological Resources Letter Report
Date:	March 24, 2026
Project Proponent:	Santa Fe Flores LP P.O. Box 903 Rancho Santa Fe, CA 92067
Prepared for:	City of San Marcos
City-approved CEQA Consultant:	Jade Woll RECON Environmental, Inc. 3111 Camino del Rio North, Suite 600 San Diego, CA 92108
Signature of City-approved CEQA Consultant:	

1.0 INTRODUCTION, PROJECT DESCRIPTION, AND LOCATION

On February 28, 2023, the City of San Marcos City Council adopted a Mitigated Negative Declaration (MND; ND22-008; SCH No. 2022090486), approved a General Plan Amendment (GPA) (GPA21-0008), and approved a Multi-Family Site Development Plan (MFSDP21-0002) for the Santa Fe Flores, LP Project (approved project). The requested Rezone (R21-0004) required a second reading prior to approval on March 14, 2023. A biological resources survey report was prepared in 2022 for the approved project which evaluated the impacts associated with a GPA to change the land use from Commercial (C) and Light Industrial (L-I) to Medium Density Residential 2 (MDR2) and a zone change from Commercial (C) and Light Industrial (L-I) to Multi-Family Residential (R-3-10) to allow for the construction of 50 dwelling units, in conjunction with a Density Bonus, on a 2.53-acre site (2.23 net acres) consisting of two parcels, assessor parcel numbers (APNs) 217-161-18 and 217-161-19.

Subsequent to MND approval, the applicant modified the site plan (modified project) and added 0.37 acres of APN 217-161-17. The modified project would develop 46 multi-family residential townhome units in seven buildings that would be three stories and 35 feet 4 inches in height. Vehicle parking would include 92 spaces within attached garages and 15 guest spaces.

The modified project site totals 2.6 net acres [2.23 acres plus 0.37 acres (added with modified project; see above)]. The modified project also proposes approximately 0.12 acres of off-site improvements, including the construction of a new shared driveway extending into the southern portion of APN 217-161-17, upgrades to the existing liquor store parking lot, and landscaping within the eight-foot-wide irrevocable offer of dedication area along the project frontage. The liquor store would not be part of the modified project and would remain. Project grading would include 23,300 cubic yards of cut and 3,200 cubic yards of fill, resulting in the export of 20,100 cubic yards of soil.

An addendum (Addendum No. 1) has been prepared to assess impacts associated with the modified project. This report describes the results of the biological resources survey conducted for the approved project in 2022, as well as the updated biological resources survey conducted for the modified project in 2024.

The modified project is located in San Marcos, California (Figure 1), in the Los Vallecitos de San Marcos Land Grant, of the U.S. Geological Survey (USGS) 7.5-minute topographic map, San Marcos (Figure 2; USGS 1996). It is located west of North Las Flores Drive, north of South Santa Fe Avenue and north of State Route 78. The project occurs within APNs 217-161-18, 217-161-19, and a portion of 217-161-17 (Figure 3). The modified project is located within a developed area and is bounded by an existing multi-family residential development located east of North Las Flores Drive, by South Santa Fe Avenue to the south, existing industrial to the north and west, and an existing liquor store and parking lot to the southwest. The Sprinter railroad tracks and single-family residential homes off North Las Flores Drive are north and northeast of the modified project, and the Vista Meadows mobile home community is south of South Santa Fe Avenue across from the modified project (Figure 3).

2.0 ENVIRONMENTAL SETTING

The modified project is located within a developed area surrounded by light-industrial, residential, and commercial properties on all sides of the project. The City of San Marcos (City) adheres to the draft Subarea Plan under the Multiple Habitat Conservation Program (MHCP), though it has not been formally approved (City of San Marcos 2001). The MHCP is a habitat conservation plan for the seven jurisdictional areas within the northern subregion of San Diego County, including San Marcos (San Diego Association of Governments [SANDAG] 2003). This draft City of San Marcos Subarea Plan identifies a series of focused planning areas (FPA) within which some lands will be dedicated for preservation of native habitats. These areas contain both "hardline" preserve areas, which will ultimately be preserved as open space, and "softline" planning areas, which will include some areas that ultimately will become preserves and other areas that will ultimately be developed, as determined through the planning process. The modified project is located outside of any hardline preserve areas or softline planning areas identified by the draft City of San Marcos Subarea Plan. The nearest hardline reserve is approximately 2,000 feet east and northeast of the modified project.

Areas just outside the City of San Marcos within unincorporated San Diego County are within the planning boundaries of the San Diego Multiple Species Conservation Program draft North County Plan. The modified project is outside of and situated approximately 1,500 feet south of these areas, which are identified in the draft North County Plan as "Outside Open Space Network" indicating they are not intended for conservation lands (Figure 4).

3.0 SURVEY METHODS

RECON Environmental, Inc. (RECON) biologist Jade Woll conducted an initial biological survey of the approved project on March 3, 2022 (Figure 5). The modified project was surveyed by RECON biologist Danelle Gadia on October 31, 2024 (Figure 5) within an approximately 2.7-acre survey area, including on-site and off-site areas to be potentially impacted. The 2024 survey determined the current condition of the biological resources present within the modified project. Prior to conducting field surveys in both 2022 and 2024, a review of publicly available data was conducted to determine the potential for special-status species to occur within the project site. The review included data provided by U.S. Fish and Wildlife Service (USFWS) (USFWS 2024), California Natural Diversity Database (CNDDB; CDFW 2024a), and California Native Plant Society (CNPS 2024).

During the field survey, habitats were assessed for their potential to support special-status species, and all incidentally observed species were recorded. No focused special-status species surveys were conducted. All plant and wildlife species observed during the general survey are presented in Attachments 2 and 3, respectively. Plant or wildlife species are considered special status if they are: (1) covered or listed as a narrow endemic under the MHCP (SANDAG 2003); (2) listed by state or federal agencies as threatened or endangered or are proposed for listing; (3) included on CNPS California Rare Plant Ranks 1, 2, 3, or 4 (CNPS 2024); or (4) considered rare, endangered, or threatened by local conservation organizations or specialists (Reiser 2001).

4.0 VEGETATION COMMUNITIES/LAND COVER TYPES

Two vegetation communities/land cover types were identified within the survey area: disturbed land and urban/developed. The acreages of each vegetation community/land cover type within the survey area are presented in Table 1 and depicted in Figure 6. Under the MHCP, environmentally sensitive lands are categorized into different habitat groups of sensitivity. Group A consists of wetland/riparian habitats, which are considered the most sensitive of habitats. Upland vegetation communities that are classified as Group B (rare uplands), Group C (coastal sage scrub), Group D (chaparral), and Group E (annual [non-native] grasslands) are considered sensitive by the MHCP. Group F (other lands), which includes disturbed lands, is not considered sensitive (SANDAG 2003).

Table 1
Land Cover Types within the Modified Project Survey Area

Land Cover Types (Holland Code as modified by Oberbauer)	MHCP Group	Total (acres)[1,3]
Disturbed Land (11300)	F	2.3
Urban/Developed (12000)	--[2]	0.4
TOTAL[1,3]		**2.7**

MHCP = Multiple Habitat Conservation Program
[1]Includes off-site improvement area. Rounded to the nearest tenth of an acre. Any discrepancies in totals are due to rounding.
[2]No MHCP assigned group.
[3]Total acres includes approved project acreage (2.3 acres) plus modified project acreage (0.4 acres).

Disturbed Land. Disturbed land consists of areas that may have been disturbed by human activity and no longer function as a native vegetation community. Vegetation in such areas is typically dominated by opportunistic non-native species but may also contain a substantial portion of bare ground. Disturbed land can also include areas that have been previously graded, repeatedly cleared for fuel management, and/or experience repeated use (e.g., off-road-vehicle trails and construction staging sites) (Oberbauer et al. 2008).

Disturbed land occurs within the majority of the survey area and includes areas that have been disturbed through frequent off-roading activity (Attachment 1, Photographs 1 and 2). This land cover type includes non-native forbs and ornamental species with dominant species including telegraph weed (*Heterotheca grandiflora*), Russian thistle (*Salsola tragus*), bristly ox-tongue (*Helminthotheca echioides*), vanilla-scented wattle (*Acacia redolens*), and Peruvian pepper tree (*Schinus molle*). Several scattered native shrubs were identified throughout the disturbed land but these individual species were too few to form a distinct native habitat (see Figure 6). Disturbed land is classified as Group F by the MHCP. Impacts to Group F habitat types would not be considered significant and would not require mitigation.

Urban/Developed Land. Urban/developed land consists of any land that has been constructed upon, containing permanent or semi-permanent structures, pavement or hardscape, or landscaped areas that are regularly maintained and/or irrigated (Oberbauer et al. 2008). Urban/developed land includes a paved parking lot in the southwestern corner of the survey area and ornamental landscaping along the eastern edge of the survey area (see Figure 6 and Photograph 1). As noted in Section 1.0 above, the existing liquor store would not be part of the modified project and would remain.

5.0 WILDLIFE SPECIES

Wildlife species observed during the time of the survey include those typically found within disturbed and urban/developed land such as American crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), California ground squirrel (*Otopermophilus beecheyi*), and black phoebe (*Sayornis nigricans*).

6.0 AQUATIC RESOURCES

A formal wetland delineation was not conducted; however, no potential jurisdictional wetlands or waters were observed within the modified project. Additionally, no vernal pools or depressions containing wetland or vernal pool plant species characteristic of vernal habitat were observed during the survey.

7.0 SPECIAL-STATUS SPECIES

7.1 Special Status Plant Species

One special status plant species, decumbent goldenbush (*Isocoma menziesii* var. *decumbens)*, was observed within the approved project during the 2022 biological survey (see Figure 6; RECON 2022). A total of 30 individuals were observed (Figure 6). No other sensitive plants were observed within the modified project area or are anticipated to occur due to high levels of disturbance within the BSA (e.g., off-roading activity, prevalence of non-native species). Additionally, thread-leaved brodiaea (*Brodiaea filifolia*) was not observed during the 2022 biological survey, which was conducted during the species blooming period (March–June) when vegetative stems/stalks or blooming individuals would have been visible. Furthermore, the modified project lacks suitable vernal pool and grassland habitat to support this species and consists of predominantly non-native species and heavily disturbed areas from frequent off-roading activity. A comprehensive list of sensitive plant species with a potential to occur within the BSA based on the records search is presented in Attachment 4 and includes species with potential to occur based on species range and habitat conditions (CDFW 2024b and 2024c).

7.2 Special Status Wildlife Species

No special status wildlife species were observed within the survey area; however, one special status wildlife species, Cooper's hawk (*Accipiter cooperii*), has a moderate potential to occur on-site. A comprehensive list of sensitive wildlife species with potential to occur in the survey area based on the record search is presented in Attachment 5 and includes species with potential to occur based on species range and habitat conditions (CDFW 2024a and 2024d; USFWS 2024).

Cooper's Hawk (Nesting). The Cooper's hawk is a CDFW watch list species (nesting) and a MHCP-covered species (CDFW 2024a; SANDAG 2003). This species has a moderate potential to occur due to the presence of suitable trees for nesting within the disturbed land and urban/developed within the survey area. No individuals or active nests were observed at the time of the survey.

Nesting/Migratory Birds. The survey area has the potential to support migratory and nesting birds. Under Section 3503 of the California Fish and Game Code (CFGC), 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. Section 3503.5 of the CFGC prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs.

8.0 WILDLIFE CORRIDORS AND LINKAGES

Though it is reasonable to assume that urban-adapted species may occur locally within the modified project, the project as a whole does not function as a wildlife movement corridor and there is no indication that it supports any wildlife nursery sites. The modified project is outside any City FPAs and biological core and linkage areas (BCLA).

9.0 SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

This section describes project impacts and recommended avoidance and mitigation measures based on the County's MHCP (SANDAG 2003) and Report Format and Content Recommendations for biological resources reports (City of San Marcos 2022).

9.1 Vegetation Community Impacts and Proposed Mitigation

The modified project would cause direct permanent impacts to 2.3 acres of disturbed land and 0.4 acres of urban/developed (Table 2; Figure 7). Impacts to disturbed land and urban/developed are not considered significant and, therefore, no mitigation would be required.

Table 2
Habitat/Vegetation Communities, Impacts, and Mitigation

Habitat/ Vegetation Community	Total Impacts (acres)[3]	Mitigation Ratio	Mitigation Required (acres)
Disturbed Land (Group F)	2.3	0:1	0.0
Urban/Developed (--[1])	0.4	N/A	N/A
TOTAL[2]	**2.7**	**-**	**0.0**

[1]No Multiple Habitat Conservation Program assigned group.
[2]Total acres include approved project acreage (2.3 acres) plus modified project acreage (0.4 acres).
[3]Rounded to nearest tenth of an acre. Any discrepancies in totals are due to rounding.
N/A = not applicable

9.2 Sensitive Plant Species

The modified project would result in direct permanent impacts to decumbent goldenbush, an impact that was disclosed in the MND for the approved project. No additional sensitive plant species were observed within the additional 0.4 acres of the modified project area in 2024. Project impacts to sensitive plant species would be limited to decumbent goldenbush within the previously approved project footprint. The 2023 MND concluded that these impacts are less than significant because the habitat for decumbent goldenbush is of marginal quality due to heavy disturbance and comprises a small fraction of the habitat available to this species both at a local level (within the City) and on a regional scale. Because the modified project does not result in any additional impacts to this species beyond that which was disclosed for the approved project, the impacts that would occur to sensitive plants would remain less than significant and no mitigation would be required.

9.3 Sensitive Wildlife Species

Migratory and Nesting Birds. Direct impacts to migratory and nesting birds, including Cooper's hawk, could result from the accidental destruction of nests during project construction activities. These impacts could occur if removal of suitable habitat for these species, such as the ornamental trees that ring the survey area were to occur during the general bird breeding season (between February 1 and September 15). Therefore, mitigation measure BIO-1 from the

MND will be implemented during construction to prevent direct impacts to migratory and nesting birds, including Cooper's hawk. Mitigation measure BIO-1 language from the MND is provided below for reference. Please note that the measure BIO-1 from the approved project used "March" and "September" as the dates within which surveys would be required. To provide greater specificity and ensure all migratory birds, including early nesting passerines and raptors are protected, minor edits to BIO-1 are provided below. In addition, impacts to nesting birds may occur up to 300 feet from the modified project footprint and as such, BIO-1 has been modified to clarify that surveys should be conducted within that survey distance prior to construction. New language is included in underline; removed language is shown in strike-through font:

BIO-1: If construction initiation occurs between ~~March~~ February 1 and September 15, a pre-construction nesting bird and raptor survey within 300 feet of the project impact area shall be completed by a qualified biologist prior to vegetation removal. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). If any active nests are detected, the area will be flagged and mapped along with a buffer as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist will be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior as a result of human interaction. Buffers will be based on species-appropriate buffers and/or local topography and line of sight, species behavior and tolerance to disturbance, and existing disturbance levels, as determined appropriate by the qualified biologist.

9.4 Jurisdictional Wetlands and Waterways

No potential jurisdictional wetlands or waters were observed on-site. Therefore, there are no anticipated impacts to any jurisdictional wetlands or waterways and no mitigation would be required.

9.5 Wildlife Movement and Nursery Sites

Though it is reasonable to assume that urban-adapted species may occur locally within the impact footprint, the site as a whole does not function as a wildlife movement corridor and there is no indication that the site supports any wildlife nursery sites. Therefore, the project will not result in any impact to wildlife movement or nursery sites and no mitigation would be required.

The modified project also is outside any City FPAs and BCLA. Therefore, there are no impacts anticipated to wildlife movement corridors, wildlife nursery sites, FPAs, or a BCLA.

10.0 REFERENCES CITED

American Society of Mammalogists
2020 Mammalian Species (online). http://www.mammalsociety.org/publications/mammalian-species. July.

Bradley, R. D., L.K. Ammerman, R. J. Baker, L. C. Bradley, J. A. Cook, R. C. Dowler, C. Jones, D. J. Schimdly, F. B. Stangl Jr., R. A. Van Den Bussche, and B. Wursig
2014 Revised Checklist of North American Mammals North of Mexico. Occasional Papers, Museum of Texas Tech University No. 327. October.

Brenzel, K. N.
2001 *Sunset Western Garden Book*. Sunset Publishing. Menlo Park, California.

California Department of Fish and Wildlife (CDFW)
2024a Special Animals. Natural Diversity Database. Department of Fish and Wildlife. October.

2024b Special Vascular Plants, Bryophytes, and Lichens List. Natural Diversity Database. Department of Fish and Wildlife. October.

2024c State and Federally Listed Endangered, Threatened, and Rare Plants of California. October.

2024d State & Federally Listed Endangered & Threatened Animals of California. October.

California Native Plant Society (CNPS)
2024 Rare Plant Program. Inventory of Rare and Endangered Plants of California (online edition, v8-03). Sacramento, CA. Accessed in July. Available at http://www.rareplants.cnps.org.

Chesser, R. T., S. M. Billerman, K. J. Burns, C. Cicero, J. L. Dunn, B. E. Hernández-Baños, A. W. Kratter, I. J. Lovette, N. A. Mason, P. C. Rasmussen, J. V. Remsen, Jr., D. F. Stotz, and K. Winker
2021 Check-list of North American Birds (online). American Ornithological Society. http://checklist.aou.org/taxa.

Crother, B. I., Ronald M. Bonett, Jeff Boundy, Frank T. Burbrink, Kevin de Queiroz, Darrel R. Frost, Richard Highton, John B. Iverson, Elizabeth L. Jockusch, Fred Kraus, Kenneth L. Krysko, , Adam D. Leaché, Emilly Moriarty Lemmon, Roy W. McDiarmid, Joseph R. Mendelson III, Peter A. Meylan, Tod W. Reeder, Sara Ruane, and Michael E. Seidel
2017 *Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in our Understanding,* Eighth Edition. Society for the Study of Amphibians and Reptiles Herpetological Circular No. 43.

Eriksen, Clyde, and Denton Belk
1999 *Fairy Shrimp of California's Puddles, Pools, and Playas.* Mad River Press, Eureka.

Evans, Arthur V.
2008 *Field Guide to Insects and Spiders of North America.* Sterling Publishing Company, New York.

Harvey, M. J., J. S. Altenbach, and T. L. Best
2011 *Bats of the United States and Canada*. The Johns Hopkins University Press, Baltimore.

Jennings, M. R., and M. P. Hayes
1994 Amphibian and Reptile Species of Special Concern in California. Final report submitted to the California Department of Fish and Game, Inland Fisheries Division, Rancho Cordova, CA. Contract number 8023.

Jepson Flora Project (eds.)
2020 Jepson eFlora, http://ucjeps.berkeley.edu/IJM.html.

Nature Festivals of San Diego County
2002 Checklist of Butterflies of San Diego County. Professional review by David Faulkner of the San Diego Natural History Museum and Dr. John Brown of the Smithsonian Institute. Revised September. http://www.sdnhm.org/science/entomology/projects/checklist-of-butterflies-of-san-diego-county/.

NatureServe
2021 NatureServe Explorer. www.natureserve.org.

Oberbauer, T., M. Kelly, and J. Buegge
2008 *Draft Vegetation Communities of San Diego County*. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," Robert F. Holland, Ph.D., October 1986. March.

Page, L. M., H. Espinosa-Pérez, L. T. Findley, C. R. Gilbert, R. N. Lea, N. E. Mandrak, R. L. Mayden, and J. S. Nelson
2013 Common and scientific names of fishes from the United States, Canada, and Mexico, 7th edition. American Fisheries Society, Special Publication 34, Bethesda, Maryland.

Rebman, J. P., and M. G. Simpson
2014 Checklist of the Vascular Plants of San Diego County, 5th edition. San Diego Natural History Museum.

RECON Environmental, Inc.
2022 Biological Resources Report for the Santa Fe Flores Project (RECON Number 9865). November 29.

Reiser, C. H.
2001 Rare Plants of San Diego County. Aquafir Press. July.

San Diego, County of
2010 Guidelines for Determining Significance. Biological Resources, Land Use and Environment Group. Department of Planning and Land Use. Department of Public Works. Fourth Revision. September 15.

San Diego Association of Governments (SANDAG)
2003 Final MHCP Plan. Prepared for the Multiple Habitat Conservation Program for the Cities of Carlsbad, Encinitas, Escondido, San Marcos, Solana Beach, and Vista. Volumes I, II, and III. March.

San Marcos, City of
2001 Natural Community Conservation Plan for the City of San Marcos. Agency review draft, May.

2022 Report Format and Content Recommendations, Biological Resources Report. May. Available: https://www.san-marcos.net/home/showpublisheddocument/26428/637883135667770000

Tremor, Scott, D. Stokes, W. Spencer, J. Diffendorfer, H. Thomas, S. Chivers, and P. Unitt, eds.
2017 San Diego County Mammal Atlas. San Diego Natural History Museum.

Unitt, P. A.
2004 *San Diego County Bird Atlas*. San Diego Natural History Museum, Ibis, San Diego

United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS)
2024 The PLANTS Database. National Plant Data Team, Greensboro, North Carolina, USA. Accessed from http://plants.usda.gov.

U.S. Fish and Wildlife Service (USFWS)
2024 Species Observation Database.

U.S. Geological Survey (USGS)
1996 7.5 minute topographic map series, San Marcos quadrangle, Los Vallecitos de San Marcos Land Grant.

Western Bat Working Group (WBWG)
2017 Western Bat Species (species accounts). http://wbwg.org/western-bat-species/.

11.0 LIST OF PREPARERS

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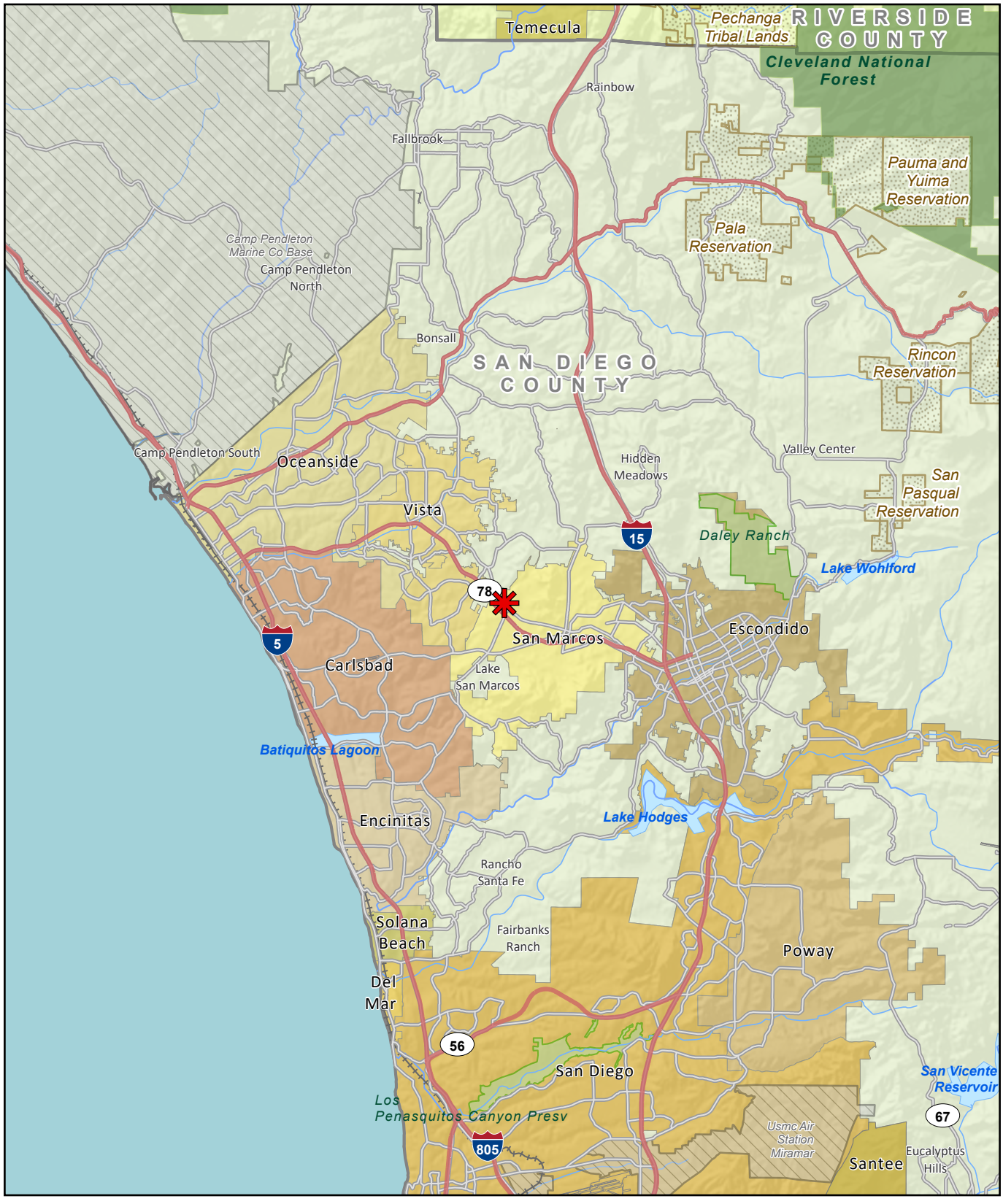

Project Location

RECON

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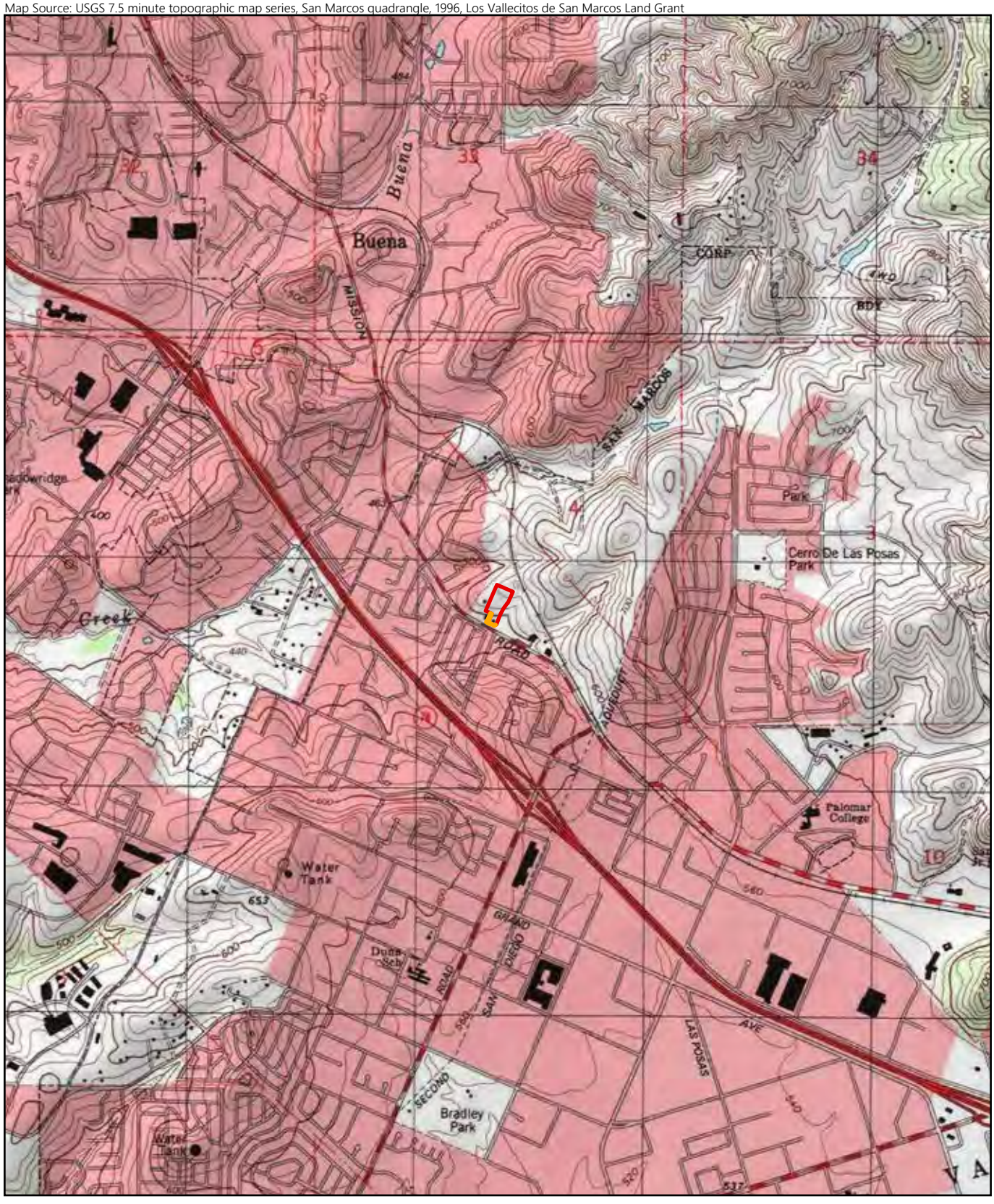
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, San Marcos quadrangle, 1996, Los Vallecitos de San Marcos Land Grant



0 Feet 2,000

Project Boundary

Off-site Improvements

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FIGURE 2
Project Location on USGS Map

Image Source: Nearmap (flown September 2025)

Project Boundary
Off-site Improvements
Approved Project
Modified Project
Parcels

0 Feet 150

RECON

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FIGURE 3
Project Location on Aerial Photograph

Image Source: Nearmap (flown September 2025)

Project Boundary

Off-site Improvements

North County Draft MSCP

Outside Open Space Network

Draft San Marcos MHCP Subarea Plan

Focused Planning Areas

Hardline Preserve Area

Softline Planning Area

0 Feet 600

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FIGURE 4

Project in Relation to MSCP Preserve Area

Image Source: Nearmap (flown September 2025)

Project Boundary
Off-site Improvements
Survey Area 2022 (Approved Project)
Survey Area 2024 (Modified Project)

0 Feet 100

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FIGURE 5
Project Survey Areas

Image Source: Nearmap (flown September 2025)

Project Boundary
Off-site Improvements
Modified Project
Decumbent Goldenbush
(*Isocoma menziezii decumbens*)

Vegetation Community
Disturbed Land
Urban/Developed

0 Feet 100

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FIGURE 6
Existing Biological Resources

Image Source: Nearmap (flown September 2025)

Project Boundary
Off-site Improvements
Modified Project
Impact Areas

Decumbent Goldenbush
(*Isocoma menziezii decumbens*)

Vegetation Community
Disturbed Land
Urban/Developed

0 Feet 100

RECON

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FIGURE 7
Impacts to Biological Resources

ATTACHMENTS

ATTACHMENT 1

Site Photographs

PHOTOGRAPH 1
View of Disturbed Land in Project Site, Facing Southeast

PHOTOGRAPH 2
View of Disturbed Land and Urban/Developed in Project Site, Facing Northwest

ATTACHMENT 2

Plant Species Observed

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
ANGIOSPERMS: MONOCOTS			
ARECACEAE	PALM FAMILY		
Washingtonia robusta	Mexican fan palm	DL	I
POACEAE (GRAMINEAE)	GRASS FAMILY		
Avena sp.	oats	DL	I
Bromus diandrus	ripgut grass	DL	I
Bromus rubens [=*Bromus madritensis* ssp. *rubens*]	red brome	DL	I
Festuca perennis [=*Lolium multiflorum* and *Lolium perenne*]	rye grass	DL	I
Hordeum murinum	wall barley	DL	I
Pennisetum setaceum	crimson fountain grass	DL	I
ANGIOSPERMS: EUDICOTS			
AIZOACEAE	FIG-MARIGOLD FAMILY		
Carpobrotus edulis	freeway iceplant	DL	I
ANACARDIACEAE	SUMAC OR CASHEW FAMILY		
Schinus molle L.	Peruvian pepper tree	DL	I
Searsia [=Rhus] lancea	African sumac	UD	I
APIACEAE (UMBELLIFERAE)	CARROT FAMILY		
Foeniculum vulgare	fennel	DL	I
ASTERACEAE	SUNFLOWER FAMILY		
Baccharis pilularis	chaparral broom, coyote brush	DL	N
Baccharis salicifolia ssp. *salicifolia*	mule fat, seep-willow	DL	N
Cynara cardunculus ssp. *flavescens*	cardoon, artichoke thistle	DL	I
Dittrichia graveolens	stinkwort	DL	I
Hedypnois cretica	Crete weed	DL	I

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
Helminthotheca [=*Picris*] *echioides*	bristly ox-tongue	DL	I
Heterotheca grandiflora	telegraph weed	DL	N
Isocoma menziesii	coastal goldenbush	DL	N
Isocoma menziesii var. *decumbens*	decumbent goldenbush	DL	N
BRASSICACEAE (CRUCIFERAE)	**MUSTARD FAMILY**		
Brassica sp.	mustard	DL	I
Brassica rapa	turnip, field mustard	DL	I
CAPRIFOLIACEAE	**HONEYSUCKLE FAMILY**		
Lonicera japonica	Japanese honeysuckle	UD	I
CHENOPODIACEAE	**GOOSEFOOT FAMILY**		
Salsola tragus	Russian thistle, tumbleweed	DL	I
CONVOLVULACEAE	**MORNING-GLORY FAMILY**		
Calystegia macrostegia	morning-glory	DL	N
EUPHORBIACEAE	**SPURGE FAMILY**		
Euphorbia peplus	petty spurge	DL	I

Attachment 2 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
FABACEAE (LEGUMINOSAE)	**LEGUME FAMILY**		
Acacia redolens Maslin	desert carpet	DL	I
Acmispon glaber [=*Lotus scoparius*]	deerweed, California broom	DL	N
Astragalus trichopodus var. *lonchus*	ocean locoweed	DL	N
Medicago polymorpha	California burclover	DL	I
Melilotus albus	white sweetclover	DL	I
GERANIACEAE	**GERANIUM FAMILY**		
Erodium botrys	long-beak filaree	DL	I
Erodium moschatum	greenstem filaree	DL	I
MALVACEAE	**MALLOW FAMILY**		
Malva neglecta	common mallow, cheeses	DL	I
OXALIDACEAE	**OXALIS FAMILY**		
Oxalis pes-caprae	Bermuda buttercup	DL	I
POLYGONACEAE	**BUCKWHEAT FAMILY**		
Polygonum aviculare	Prostrate knotweed	DL	I
SCROPHULARIACEAE	**FIGWORT FAMILY**		
Myoporum parvifolium	slender myoporum	UD	I
VERBENACEAE	**VERVAIN FAMILY**		
Lantana montevidensis	trailing lantana	UD	I

NOTE: Scientific and common names were primarily derived from Jepson eFlora (Jepson Flora Project 2020). In instances where common names were not provided in this resource, common names were obtained from Rebman and Simpson (2014). Additional common names were obtained from the USDA maintained database (USDA 2021) or the *Sunset Western Garden Book* (Brenzel 2001) for ornamental/horticultural plants. Common names denoted with * are from County of San Diego 2010.

HABITAT

DL = Disturbed Land
UD = Urban/Developed

ORIGIN

N = Native to locality
I = Introduced species from outside locality

ATTACHMENT 3

Wildlife Species Observed

Attachment 3 Wildlife Species Observed				
Scientific Name	Common Name	Occupied Habitat	On-Site Abundance/ Seasonality (Birds Only)	Evidence of Occurrence
INVERTEBRATES				
PIERIDAE	**WHITES & SULPHURS**			
Pieris rapae	cabbage white (I)	DL		O
BIRDS				
ACCIPITRIDAE	**HAWKS, KITES, & EAGLES**			
Buteo lineatus	red-shouldered hawk	FO	F/ Y	O
COLUMBIDAE	**PIGEONS & DOVES**			
Zenaida macroura	mourning dove	FO	C/ Y	O
TROCHILIDAE	**HUMMINGBIRDS**			
Calypte anna	Anna's hummingbird	DL	C/ Y	O
CORVIDAE	**CROWS, JAYS, & MAGPIES**			
Corvus brachyrhynchos	American crow	FO	C/ Y	O
AEGITHALIDAE	**BUSHTIT**			
Psaltriparus minimus	bushtit	UD	C/ Y	V
Melozone [=*Pipilo*] *crissalis*	California towhee	DL	C/ Y	O
MAMMALS				
SCIURIDAE	**SQUIRRELS & CHIPMUNKS**			
Otopermophilus [=*Spermophilus*] *beecheyi*	California ground squirrel	DL		B
CANIDAE	**CANIDS**			
Canis latrans	coyote	DL		S

(I) = Introduced species

NOTE: Zoological nomenclature for invertebrates is in accordance with the NatureServe 2021 and Evans 2008; for fish with NatureServe 2021; for reptiles and amphibians with Crother et. al (2017); for birds with Chesser et al. 2021; for mammals with Bradley et al. (2014), American Society of Mammalogists 2021.

Attachment 3 Wildlife Species Observed				
Scientific Name	Common Name	Occupied Habitat	On-Site Abundance/ Seasonality (Birds Only)	Evidence of Occurrence

HABITATS

DL = Disturbed land
FO = Flying overhead
UD = Urban/developed

EVIDENCE OF OCCURRENCE

B = Burrow
O = Observed
S = Scat
V = Vocalization

ABUNDANCE

C = Common to abundant; almost always encountered in proper habitat, usually in moderate to large numbers
F = Fairly common; usually encountered in proper habitat, generally not in large numbers

SEASONALITY (birds only)

Y = Year-round resident; probable breeder on-site or in vicinity

ATTACHMENT 4

Sensitive Plant Species with the Potential to Occur

Attachment 4 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status			Habitat Preference/ Requirements	Detected On-Site Yes/No	Potential to Occur On-Site (Observed or L/M/H/U)	Basis for Determination of Occurrence Potential
	State/ Federal Status	CNPS Rank	County of San Diego				
ANGIOSPERMS: DICOTS							
APIACEAE **CARROT FAMILY**							
Eryngium aristulatum var. *parishii* San Diego button-celery	SE/FE	1B.1	--	Biennial/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April–June; elevation less than 2,000 feet. Known from San Diego and Riverside counties. Additional populations occur in Baja California, Mexico.	No	U	Unlikely to occur due to lack of vernal pools, mesic areas of coastal sage scrub, and grasslands. This species has been documented within a one-mile radius of the project site (CDFW 2024b).
ASTERACEAE **SUNFLOWER FAMILY**							
Isocoma menziesii var. *decumbens* decumbent goldenbush	–/–	1B.2	--	Perennial shrub; chaparral, coastal sage scrub; sandy soils, often in disturbed areas; blooms April–November; elevation less than 500 feet.	Yes	H	This species was **observed** within the project site.

Attachment 4 Sensitive Plant Species Observed or with the Potential to Occur							
Scientific Name Common Name	Sensitivity Code & Status State/ Federal Status	 CNPS Rank	 County of San Diego	Habitat Preference/ Requirements	Detected On-Site Yes/No	Potential to Occur On-Site (Observed or L/M/H/U)	Basis for Determination of Occurrence Potential
ANGIOSPERMS: MONOCOTS							
THEMIDACEAE BRODIAEA FAMILY							
Brodiaea filifolia thread-leaved brodiaea [=thread-leaf brodiaea]	SE/FT	1B.1	--	Perennial herb (bulbiferous); cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools; often clay soils; blooms March–June; elevation 80-3,675 feet. California endemic. Known from San Diego, Riverside, Orange, Los Angeles, and San Bernardino counties.	No	U	Unlikely to occur due to lack of cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, and vernal pools. This species has been documented within a one-mile radius of the project site (CDFW 2024b).
Brodiaea orcuttii Orcutt's brodiaea	–/–	1B.1	--	Perennial herb (bulbiferous); closed cone coniferous forest, chaparral, meadows and seeps, valley and foothill grassland, vernal pools; mesic, clay soil; blooms May–July; elevation less than 5,600 feet.	No	U	Unlikely to occur due to lack of closed cone coniferous forest, chaparral, meadows and seeps, valley and foothill grassland, and vernal pools. This species has been documented within a one-mile radius of the project site (CDFW 2024b).

Attachment 4 Sensitive Plant Species Observed or with the Potential to Occur							
	Sensitivity Code & Status						
Scientific Name Common Name	State/ Federal Status	CNPS Rank	County of San Diego	Habitat Preference/ Requirements	Detected On-Site Yes/No	Potential to Occur On-Site (Observed or L/M/H/U)	Basis for Determination of Occurrence Potential

NOTE: Scientific and common names were primarily derived from Jepson eFlora (Jepson Flora Project 2020). In instances where common names were not provided in this resource, common names were obtained from Rebman and Simpson (2014). Additional common names were obtained from the USDA maintained database (USDA 2021) or the *Sunset Western Garden Book* (Brenzel 2001) for ornamental/horticultural plants. Common names denoted with * are from County of San Diego 2010.

FEDERAL CANDIDATES AND LISTED PLANTS

FE = Federally listed endangered

FT = Federally listed threatened

STATE LISTED PLANTS

SE = State listed endangered

CALIFORNIA NATIVE PLANT SOCIETY (CNPS): CALIFORNIA RARE PLANT RANKS (CRPR)

1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.

.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).

.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).

POTENTIAL TO OCCUR ON-SITE

U = Unexpected

ATTACHMENT 5

Sensitive Wildlife Species with the Potential to Occur

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur						
Common Name/ Scientific Name	Sensitivity Code & Status		Habitat Preference/ Requirements	Detected On-Site? Yes/No	Potential to Occur On-Site (Observed or L/M/H/U)	Basis for Determination of Occurrence Potential
	State/Federal Status	County of San Diego				
INVERTEBRATES						
BRANCHINECTIDAE FAIRY SHRIMP						
San Diego fairy shrimp *Branchinecta sandiegonensis*	FT	MHCP	Vernal pools.	No	U	Not expected to occur. No vernal pools or other depressions containing wetland or vernal pool plant species characteristic of vernal habitat were observed.
BIRDS						
ACCIPITRIDAE HAWKS, KITES, & EAGLES						
Cooper's hawk (nesting) *Accipiter cooperii*	WL/-	MHCP	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.	No	M	Moderate potential to nest within the project site due to the presence of suitable trees for nesting.
POLIOPTILIDAE GNATCATCHERS						
Coastal California gnatcatcher *Polioptila californica californica*	SSC/FT	MHCP	Coastal sage scrub, maritime succulent scrub. Resident.	No	U	Not expected to occur due to the lack of coastal sage scrub, and maritime succulent scrub. This species has been documented within a one-mile radius of the project site (CDFW 2024b).

Attachment 5 Sensitive Wildlife Species Occurring or with the Potential to Occur						
Common Name/ Scientific Name	Sensitivity Code & Status State/Federal Status	 County of San Diego	Habitat Preference/ Requirements	Detected On-Site? Yes/No	Potential to Occur On-Site (Observed or L/M/H/U)	Basis for Determination of Occurrence Potential
PASSERELLIDAE NEW WORLD PASSERINES						
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	WL/-	MHCP	Coastal sage scrub, chaparral, grassland. Resident.	No	U	Not expected to occur due to the lack of coastal sage scrub, chaparral, and grassland. This species has been documented within a one -mile radius of the project site (CDFW 2024b).
MAMMALS						
MUSTELIDAE WEASELS, OTTERS, & BADGERS						
American badger *Taxidea taxus*	SSC/-	--	Grasslands, Sonoran desert scrub.	No	U	Not expected to occur in the project site due to the high level of disturbance and lack of suitable habitat. This species has been documented within a one-mile radius of the project site (CDFW 2024a).

(I) = Introduced species

NOTE: Zoological nomenclature for invertebrates is in accordance with the NatureServe 2021 and Evans 2008; for fish with NatureServe 2021; for reptiles and amphibians with Crother et. al (2017); for birds with Chesser et al. 2021; for mammals with Bradley et al. (2014), American Society of Mammalogists 2021. Determination of the potential occurrence for listed, sensitive, or noteworthy species is based upon known ranges and habitat preferences for species follows Eriksen and Belk 1999, Nature Festivals of San Diego County 2002, Evans 2008, Page et al. 2013, Jennings and Hayes 1994, Unitt 2004, Tremor et. al. 2017, Western Bat Working Group 2017, and Harvey et al. 2011. Listing status is based on California Department of Fish and Wildlife, Natural Diversity Database (CDFW) 2024d and the County of San Diego MHCP (SANDAG 2003).

Attachment 5
Sensitive Wildlife Species Occurring or with the Potential to Occur

STATUS CODES

Listed/Proposed

FT = Listed as threatened by the federal government

Other

SSC = California Department of Fish and Wildlife species of special concern

WL = California Department of Fish and Wildlife watch list species

MHCP = Multiple Habitat Conservation Program covered species

Potential to Occur On-Site

M = Medium

U = Unexpected