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Project No: 22-13460

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Via email: sophia@mitchellplanning.net

Subject: Focused Rare Plant Survey Report for the Woodward Specific Plan Development Project, San Marcos, San Diego County, California

Dear Ms. Mitchell:

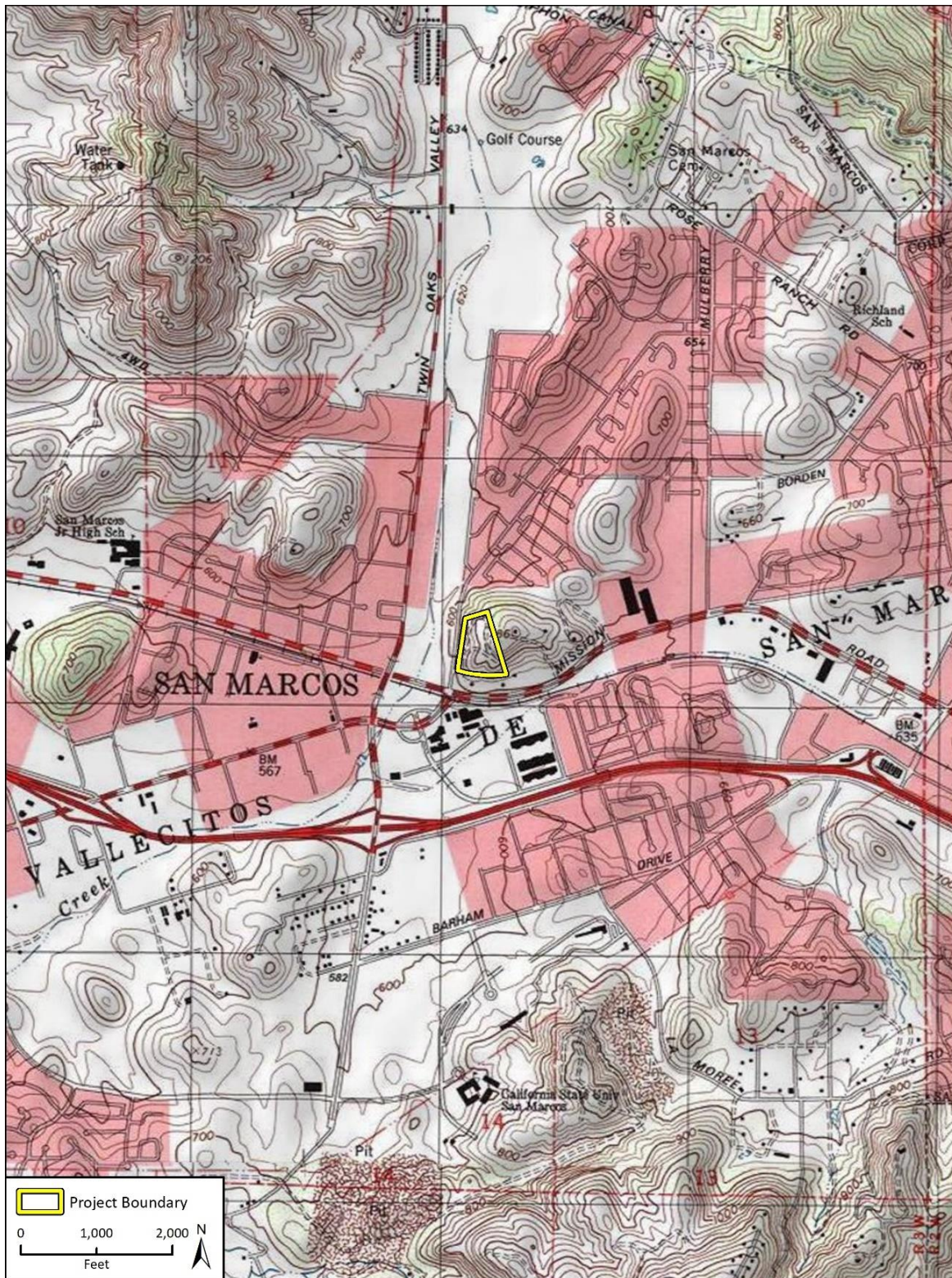
Rincon Consultants, Inc. (Rincon) prepared this Focused Rare Plant Survey Report to document the results of focused rare plant surveys (surveys), which were conducted within the proposed Woodward Specific Plan Development Project's (Project) potential impact areas (Project Area), plus a 100-foot buffer (Study Area; Figure 1). The Project Area is in the City of San Marcos, California and contains undeveloped Diegan coastal sage scrub and disturbed vegetation communities. The surveys were conducted during the appropriate phenological period to evaluate for the presence or absence of the following special status plant species: San Diego sand aster (*Corethrogyne filaginifolia* var. *incana*), which is a California Rare Plant Rank [CRPR] 1B.1 species and has a moderate potential to occur within the Study Area, and San Diego ambrosia (*Ambrosia pumila*), which is a Federal Endangered Species Act (FESA) Endangered species and a CRPR 1B.1 species and has a low potential to occur within the Study Area. The surveys were conducted as a recommended mitigation measure (MM)-7 of the Project's Full Biological Resources Report (FBRR; Rincon 2023). MM-7 states that surveys for special status plant species should be conducted within the approximately 8-acre Project Area plus a 100-foot buffer (Study Area) prior to Project initiation to avoid impacts to these species. As described in this report, no special status plant species were observed during the surveys.

Regulatory Background

Local, state, and federal agencies regulate protected plant species, and may require an assessment of their presence or potential presence to be conducted on site prior to the approval of a proposed development. Assessments for the potential occurrence of rare plant species are based upon known ranges, habitat preferences for the species, species occurrence records from the California Natural Diversity Database (CNDDDB), species occurrence records from other sites in the vicinity of the survey area, and previous reports for the Study Area.

For the purpose of this report, rare plant species are those plants listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) under the FESA; those listed or candidates for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA) or Native Plant Protection Act; those recognized by the CDFW under the California Native Plant Society (CNPS) CRPR system (Ranks 1 through 4, Table 1; Rank Threat Code Extensions, Table 2).

Figure 1 Project Location



Basemap provided by National Geographic Society, Esri, and their licensors © 2023. San Marcos Quadrangle. T12S R03W S11.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Table 1 California Rare Plant Rank Definitions

Rank	Definition
1A	Presumed Extinct in California
1B	Rare, Threatened, or Endangered in California and elsewhere
2	Rare, Threatened, or Endangered in California, but more common elsewhere
3	Need more information (a Review List)
4	Plants of Limited Distribution (a Watch List)

Table 2 California Rare Plant Rank Threat Code Extensions

Threat Rank	Definitions
.1	Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
.2	Fairly endangered in California (20-80% occurrences threatened)
.3	Not very endangered in California (<20% of occurrences threatened)

Methodology

The database search and literature review was conducted as a part of the Project's FBRR to identify special status plant species that have been recorded in the vicinity of the Study Area. Field surveys were conducted to determine whether the two special status species identified during the literature and database review (i.e., San Diego sand aster and San Diego ambrosia) as having a low potential and moderate potential, respectively, occur within the Study Area. The methods used for the database search/literature review are described within the FBRR and methodology used for the field surveys are described below.

Nomenclature follows *The Jepson Manual, Second Edition* (Baldwin et al. 2012) with updates available in the online Jepson eFlora (University of California, Berkely 2023), and listing or special status updates available in the *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2023a), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2023b), and the online Inventory of Rare and Endangered Plants of California (CNPS 2023).

Field Survey

The rare plant surveys were floristic in nature (i.e., all plants encountered were identified to the lowest taxonomic level necessary to determine rarity) and generally followed the *CNPS Botanical Survey Guidelines* (CNPS 2001), the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018), and *USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* (2000). The surveys were performed by Rincon Botanist Casey Clark on June 16, 2023 and September 20, 2023. All plant species observed on site were recorded.

To optimize detection, the field survey was conducted during the appropriate phenological period to detect and identify the San Diego sand aster and San Diego Ambrosia (i.e., May through September). The survey was conducted using systematic field techniques by walking parallel transects through the entire survey area. Special attention was given to areas with a high potential to support rare plant species (e.g., north-facing slopes, vegetation community interfaces, areas with unique soils, and other attributes required of species that have been previously documented). The results of the rare plant survey are discussed below.



Results

Neither San Diego sand aster nor San Diego ambrosia were observed during the surveys and the surveys were conducted during an adequate rain year when the conditions were conducive for germination. No other special status plant species were detected, and none are expected based on the results of this survey. A list of all plant species observed within the Study Area is provided in Attachment 1. Representative photographs of the Project Area are provided in Attachment 2.

Conclusion and Recommendations

No special status plant species were detected within the Study Area; therefore, impacts to these species are not anticipated as a result of the Project.

Thank you for the opportunity to provide support for this important project. Please do not hesitate to contact us with any questions.

Sincerely,
Rincon Consultants, Inc.

A handwritten signature in blue ink that reads "W. Casey Clark".

Casey Clark
Botanist

A handwritten signature in blue ink that reads "Jared Reed".

Jared Reed
Senior Biologist/Project Manager

Attachments

Attachment 1 Floral Compendium

Attachment 2 Representative Photographs



References

- California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Sacramento, California. Accessed September 2023.
- _____. 2023a. State and Federally listed Endangered, Threatened, and Rare Plants of California. Available online at: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>. Accessed September 2023.
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- _____. 2023. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Available online at: <http://www.rareplants.cnps.org>. Accessed September 2023.
- University of California, Berkeley. 2023. The Jepson Herbarium. Available online at: <http://ucjeps.berkeley.edu/eflora/>. Accessed September 2023.
- United States Fish and Wildlife Service (USFWS). 2000. Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants. Available online at: <https://www.fws.gov/sites/default/files/documents/botanical-plant-inventory-guidelines.pdf>. Accessed September 2023.

Attachment 1

Floral Compendium



Floral Compendium

Scientific Name	Common Name	Status ¹	Native or Introduced
<i>Acmispon glaber</i>	Deerweed	None	Native
<i>Agave americana</i>	American century plant	None	Introduced
<i>Artemisia californica</i>	California sagebrush	None	Native
<i>Arundo donax</i>	Giant reed	Cal-IPC High	Introduced
<i>Avena barbata</i>	Slender oat	Cal-IPC Moderate	Introduced
<i>Avena fatua</i>	Wild oat	Cal-IPC Moderate	Introduced
<i>Baccharis pilularis</i>	Coyote brush	None	Native
<i>Baccharis sarothroides</i>	Broom baccharis	None	Native
<i>Brassica nigra</i>	Black mustard	Cal-IPC Moderate	Introduced
<i>Brickellia californica</i>	Brickell bush	None	Native
<i>Bromus diandrus</i>	Ripgut brome	Cal-IPC Moderate	Introduced
<i>Bromus madritensis</i> ssp. <i>rubens</i>	Red brome	Cal-IPC High	Introduced
<i>Carduus pycnocephalus</i>	Italian thistle	Cal-IPC Moderate	Introduced
<i>Centaurea melitensis</i>	Tocalote	Cal-IPC Moderate	Introduced
<i>Deinandra fasciculata</i>	Clustered tarweed	None	Native
<i>Diplacus aurantiacus</i>	Sticky monkeyflower	None	Native
<i>Diplacus puniceus</i>	Red bush monkeyflower	None	Native
<i>Echium candicans</i>	Pride of madeira	Cal-IPC Limited	Introduced
<i>Encelia californica</i>	California encelia	None	Native
<i>Eriogonum fasciculatum</i>	California buckwheat	None	Native
<i>Eriophyllum confertiflorum</i>	Golden-yarrow	None	Native
<i>Eucrypta chrysanthemifolia</i>	Common eucrypta	None	Native
<i>Euphorbia polycarpa</i>	Small seed sandmat	None	Native
<i>Festuca myuros</i>	Rattail fescue	Cal-IPC Moderate	Introduced
<i>Hazardia squarrosa</i>	Sawtooth goldenbush	None	Native
<i>Heterotheca grandiflora</i>	Telegraph weed	None	Native
<i>Hirschfeldia incana</i>	Shortpod mustard	Cal-IPC Moderate	Introduced
<i>Isocoma menziesii</i> var. <i>menziesii</i>	Menzies' goldenbush	None	Native
<i>Lysimachia arvensis</i>	Scarlet pimpernel	None	Introduced
<i>Malosma laurina</i>	Laurel sumac	None	Native
<i>Marah macrocarpa</i>	Wild cucumber	None	Native
<i>Marrubium vulgare</i>	Horehound	Cal-IPC Limited	Introduced
<i>Mirabilis laevis</i>	Wishbone bush	None	Native
<i>Navarretia hamata</i>	Hooked navarretia	None	Native
<i>Nicotiana glauca</i>	Tree tobacco	Cal-IPC Moderate	Introduced
<i>Nuttallanthus texanus</i>	Blue toadflax	None	Native
<i>Opuntia littoralis</i>	Coast prickly pear	None	Native
<i>Opuntia robusta</i>	Nopal tapon	None	Introduced
<i>Paeonia californica</i>	California peony	None	Native



Scientific Name	Common Name	Status ¹	Native or Introduced
<i>Phacelia ramosissima</i>	Branching phacelia	None	Native
<i>Physalis crassifolia</i>	Thick leaved ground cherry	None	Native
<i>Pseudognaphalium californicum</i>	California everlasting	None	Native
<i>Quercus berberidifolia</i>	Scrub oak	None	Native
<i>Rhamnus crocea</i>	Red berry buckthorn	None	Native
<i>Rhus integrifolia</i>	Lemonade berry	None	Native
<i>Salix laevigata</i>	Red willow	None	Native
<i>Salvia apiana</i>	White sage	None	Native
<i>Salvia mellifera</i>	Black sage	None	Native
<i>Sambucus mexicana</i>	Blue elderberry	None	Native
<i>Scrophularia californica</i>	California bee plant	None	Native
<i>Stephanomeria diegensis</i>	San Diego milk aster	None	Native
<i>Syagrus romanzoffiana</i>	Queen palm	None	Introduced
<i>Washingtonia robusta</i>	Mexican fan palm	None	Introduced
<i>Zeltnera venusta</i>	California centaury	None	Native

¹ Cal-IPC 2023.

Attachment 2

Representative Photographs



Photograph 1. South-facing representative photograph of the middle, disturbed, portion of the Project Area. Photograph taken on June 16, 2023.



Photograph 2. South-facing representative photograph of the Diegan coastal sage scrub within the northern portion of the Project Area. Photograph taken on June 16, 2023.



Photograph 3. Southeast-facing representative photograph of the Project Area. Photograph taken within the southwestern portion of the Project Area on September 20, 2023.



Photograph 4. North-facing representative photograph of the Project Area. Photograph taken within the southern portion of the Project Area on September 20, 2023