ROCKS
BIOLOGICAL CONSULTING



JESMOND DENE BIKE PARK PROJECT

BIOLOGICAL TECHNICAL REPORT

City of Escondido, San Diego County, California

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1 EXECUTIVE SUMMARY

This report is a summary of the results of a biological resource assessment conducted by Rocks Biological Consulting (RBC) for the Jesmond Dene Bike Park Project (project) in the City of Escondido (City), San Diego County, California. The project site occurs within a residential area and is currently used as a recreational space for the surrounding community, specifically as an unofficial bike park. The project would enhance and formalize the existing unofficial bike paths.

The approximately 4.38-acre project site is composed of coast live oak woodland and forest, disturbed coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, disturbed coyote brush scrub, and disturbed land.

The proposed project has potential to impact the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) and the federally and state-endangered least Bell's vireo (*Vireo bellii pusillus*); however, implementation of avoidance and minimization measures would reduce potential project impacts to less than significant. Three special-status wildlife species, coastal whiptail (*Aspidoscelis tigris stejnegeri*), oak titmouse (*Baeolophus inornatus*), and wrentit (*Chamaea fasciata*), were observed during the general biological survey and an additional seven non-listed special-status wildlife species have potential to occur on site; however, potential impacts on these species would be avoided and/or minimized with implementation of project-specific measures. Additionally, the project site has potential to support nesting bird species that are protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3513; however, measures would be implemented to avoid and minimize impacts on nesting birds. The proposed project would not impact special-status plant species as none occur or have high potential to occur within the project site.

The project site is adjacent to one aquatic resource potentially jurisdictional per the U.S. Army Corps of Engineers (Corps) pursuant to Section 404 of the Clean Water Act (CWA), the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and/or the California Department of Fish and Wildlife (CDFW) pursuant to Section 1600 – 1602 of the CFGC. However, the project has been designed to avoid this feature and impacts on potentially aquatic resources would not occur with project implementation.

2 INTRODUCTION

2.1 PROJECT LOCATION

The project site is in the City of Escondido in San Diego County, California (Figure 1). The approximately 4.38-acre project site is south of Jesmond Dene Road, west of N Broadway Road, north of Flume Road, and southeast of Edwards Access Road. The project site is surrounded by a golf course and residential development to the north, sparse residential development and open space to the west, and denser residential development on the south and east. The project site has experienced periodic grading since at least 1938 (the earliest available historical aerial; NetrOnline 2024). A drainage along the northern extent and a dirt path or roadway along the southern extent have been present in roughly their current locations since at least 1938 (NetrOnline 2024). Currently, the project site is used as bike/walking paths and residential open space. The project site is located on Assessor Parcel Numbers (APNs) 18731009 and 18731011.

2.2 PROJECT DESCRIPTION

The project proposes to create a progression-based bike park on an undeveloped portion of parkland that is informally used by the community for off-road recreational bike activities. The resulting bike park would include a pump and jump track, a skill track, and a kids track. The bike park would also include viewing areas benches, and a multi-use trail around a portion of the bike park perimeter. The proposed bike park would provide a safe, designated place for users to practice and develop their bike skills. As the project site is currently used informally for off-road recreational bike activities, it is anticipated that informal users already using the park for these activities would utilize the bike park, along with a minor increase in users once the developed bike park is completed. These users may already be utilizing the park for other recreational purposes. Unique, new users would not constitute a large increase in park usage. The design for the proposed bike park is based on input from various community stakeholders, including City staff, park users, and local community. The bike park would be constructed with high-quality materials to minimize maintenance and ensure durability and longevity. The facility would be for daytime use only; no overhead or wayfinding lighting is proposed.

Project construction is anticipated to begin in Winter 2026 with site preparation. Construction of the project is expected to occur over a period of four months and is anticipated to be completed around Fall 2026. Construction activities include demolition, grading, paving and landscaping. Grading quantities consist of the import of 2,255 cubic yards of fill to construct jumps and berms. Construction equipment expected to be utilized during demolition and construction would be typical of similar construction activities and may include equipment such as a backhoe, front-loader, excavator, dump trucks, equipment trucks, air compressors, hydraulic pumps, asphalt boom pump trucks, and asphalt/concrete delivery trucks.

2.3 SCOPE OF WORK

This Biological Technical Report (BTR) includes a description of existing biological resources within and adjacent to the proposed project footprint; provides a description of methods used to assess existing conditions and results of the project-specific biological impacts analysis; and includes

potential avoidance, minimization, and mitigation measures to eliminate and/or reduce potential project impacts. This report also includes an impact assessment on biological resources associated with the project in the context of the California Environmental Quality Act (CEQA), and state and federal regulations, including but not limited to the Endangered Species Act (ESA), CWA, and CFGC.

2.4 REGULATORY FRAMEWORK

Federal, state, and local agencies have established several regulations to protect and conserve biological resources. The descriptions below provide a brief overview of agency regulations that may be applicable to the project. The regulating agencies make the final determination as to what types of permits are required.

2.4.1 FEDERAL REGULATIONS

Federal Endangered Species Act

The federal ESA of 1973 (16 U.S.C. § 1531 et seq.), as amended, provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed species. The ESA regulates the "take" of any endangered fish or wildlife species, per Section 9. As development is proposed, the responsible agency or individual landowner is required to consult with the U.S. Fish and Wildlife Service (USFWS) to assess potential significant impacts on listed species (including plants) or their critical habitat, pursuant to Sections 7 and 10 of the ESA. USFWS is required to make a determination as to the extent of impact a project would have on a particular species. If it is determined that potential significant impacts on a species would likely occur, measures to avoid or reduce such impacts must be identified. USFWS may issue an incidental take statement, following consultation and the issuance of a Biological Opinion. This allows for take of the species that is incidental to another authorized activity, provided that the action will not adversely affect the existence of the species. Section 10 of the ESA provides for issuance of incidental take permits (ITPs) to non-federal parties with the development of a habitat conservation plan (HCP); Section 7 provides for permitting of federal projects.

Migratory Bird Treaty Act

The MBTA (16 U.S.C. § 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and listed at 50 Code of Federal Regulations (CFR) 10.13. The USFWS enforces the MBTA, which prohibits "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird, or attempt such actions, except as permitted by regulation.

Clean Water Act

Pursuant to Section 404 of the CWA (33 U.S. Code § 1344), the Corps is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the U.S. (including wetlands), which include those waters listed in 33 CFR 328.3 (88 Federal Register 61964, September 8, 2023; Revised Definition of "Waters of the United States"; Conforming). The

Corps, with oversight from the U.S. Environmental Protection Agency, has the principal authority to issue CWA Section 404 permits. Substantial impacts on waters of the U.S. may require an Individual Permit. Projects that only minimally affect waters of the U.S. may meet the conditions of one of the existing Nationwide Permits (NWP).

A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for all Section 404 permitted actions. The nine separate RWQCBs, divisions of the State Water Resources Control Board, provide oversight of the Section 401 certification process in California. The RWQCBs are required to provide Water Quality Certification for licenses or permits that authorize an activity that may result in a discharge from a point source into a water of the U.S. Water Quality Certification authorization "is limited to assuring that a discharge from a Federally licensed or permitted activity will comply with water quality requirements" (40 CFR 121.3).

The National Pollutant Discharge Elimination System is the permitting program for discharge of pollutants into surface waters of the U.S. under Section 402 of the CWA (33 U.S.C. § 1342).

2.4.2 STATE REGULATIONS

California Environmental Quality Act

The CEQA (California Public Resources Code § 21000 et seq.) was established in 1970 as California's counterpart to the National Environmental Policy Act (NEPA). CEQA requires state and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, where feasible.

CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity, which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency that may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

California Endangered Species Act

The California Endangered Species Act of 1984 (CESA; CFGC § 2050 et seq.), in combination with the California Native Plant Protection Act of 1977 (CFGC § 1900 et seq.), regulates the listing and take of plant and animal species designated as endangered, threatened, or rare within the state. California also lists species of special concern (SSC) based on limited distribution; declining populations; diminishing habitat; or unusual scientific, recreational, or educational value. The CDFW is responsible for assessing development projects for their potential to impact listed species and their habitats. State-listed special-status species are addressed through the issuance of a 2081 permit (Memorandum of Understanding).

California Fish and Game Code Sections 1600-1602

Pursuant to Division 2, Chapter 6, Section 1602 of the CFGC, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream or lake that supports fish or wildlife. A Notification of Lake or Streambed Alteration must be submitted to

CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake" (CFGC § 1602). CDFW has jurisdiction over riparian habitats associated with watercourses and wetland habitats supported by a river, lake, or stream. Jurisdictional waters are delineated by the outer edge of riparian vegetation (i.e., drip line) or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources (e.g., riparian or wetland areas not supported by a river, lake, or stream). CDFW reviews the proposed actions and, if necessary, submits (to the applicant) a proposal that includes measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

California Fish and Game Code Sections 3503, 3511, 3513, 3801, 4700, 5050, and 5515

CDFW protects and manages fish, wildlife, and native plant resources within California. The California Fish and Game Commission and/or CDFW are responsible for issuing permits for the take or possession of protected species. The following sections of the CFGC address protected species: Section 3511 (birds), Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish). In addition, the protection of birds of prey is provided for in Sections 3503, 3513, and 3800 of the CFGC.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.) provides for statewide coordination of water quality regulations. The State Water Resources Control Board (SWRCB) was established as the statewide authority and nine separate RWQCBs were developed to oversee water quality on a day-to-day basis. The RWQCBs have primary responsibility for protecting water quality in California. As discussed above, the RWQCBs regulate discharges to surface waters under the CWA. In addition, the RWQCBs are responsible for administering the Porter-Cologne Water Quality Control Act.

Pursuant to the Porter-Cologne Water Quality Control Act, the state is given authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. As such, any person proposing to discharge waste into a water body that could affect its water quality must first file a Report of Waste Discharge if a Section 404 permit is not required for the activity. "Waste" is partially defined as any waste substance associated with human habitation, including fill material discharged into water bodies.

2.4.3 REGIONAL AND LOCAL PLANS

The City of Escondido does not have any agency-specific biological regulations but follows CEQA guidelines for project processing. The City occurs within the Multiple Habitat Conservation Plan (MHCP) planning area but is not a signatory on the plan. The City prepared its *Draft Escondido Subarea Plan* in 2001, but the plan has not yet been adopted and the City does not yet have an MHCP implementing agreement with the USFWS or the CDFW. Therefore, compliance with regional or local plans is not addressed further herein, and compliance with state and federal regulations is considered to generally satisfy local requirements.

3 METHODS

RBC senior biologist Shannon Mindeman and associate biologist Kelsey Woldt conducted vegetation mapping, a general biological survey, and habitat assessments for special-status plant and wildlife species on September 6, 2023. HELIX Environmental Planning, Inc. (HELIX) biologist Amanda Mathews performed six protocol presence/absence surveys for coastal California gnatcatcher between May 17 and June 25, 2024. Rare plant surveys were conducted by RBC principal biologist Jim Rocks on April 30 and June 26, 2025, and by senior biologist Ian Hirschler on May 30, 2025. Focused Crotch's bumble bee (*Bombus crotchii*) surveys were conducted by Mr. Hirschler on April 30 and May 30, 2025, and by Mr. Rocks on June 26, 2025. Concurrent with the general biological survey, RBC assessed the project site for aquatic resources that may be considered jurisdictional under the Corps pursuant to Section 404 of the CWA, under the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and under the CDFW pursuant to Section 1602 of the CFGC.

The general biological survey, vegetation mapping, habitat assessments, and reconnaissance-level aquatic resource assessment were conducted within the approximately 4.38-acre project site, a surrounding 200-foot buffer, and a 6.6-acre plot east of the project site for a total of approximately 21.45 acres. The focused rare plant survey and Crotch's bumble bee survey were conducted within the project site and a 50-foot buffer, and the coastal California gnatcatcher survey was conducted within the project site and a 300-foot buffer. Note that where applicable, buffer areas are included in this analysis to assess the potential for special-status species or resources in areas immediately adjacent to the project site that could be impacted by the project analyzed herein. Such information should not be considered comprehensive for all biological resources or aquatic resources that may occur in buffer areas, and buffer mapping is intended only for the project analysis outlined herein. Biological information provided within this report is not intended for impact analysis of any potential future projects, including projects within or adjacent to project buffer areas.

Table 1. Summary of Survey Dates and Conditions

Date	Activity	Surveyor(s)	Time (Start-End)	Temp. (F) (Start-End)	Cloud Cover (%) (Start-End)	Wind Range (mph) (Start; End)
9/6/2023	General biological survey, vegetation mapping, habitat assessments, and constraints-level aquatic resources assessment	KW, SM	1000-1500	70-79	20-0	1-3; 5-8
5/17/2024	CAGN Survey #1	AM	0830-1030	61-64	100-100	1-4; 1-4
5/24/2024	CAGN Survey #2	AM	0900-1015	61-62	100-100	0-2; 0-2
5/31/2024	CAGN Survey #3	AM	0800-0900	58-62	100-100	0-4; 0-3
6/7/2024	CAGN Survey #4	AM	0700-0815	61-63	100-100	0-3; 0-3

Date	Activity	Surveyor(s)	Time (Start-End)	Temp. (F) (Start-End)	Cloud Cover (%) (Start-End)	Wind Range (mph) (Start; End)
6/14/2024	CAGN Survey #5	AM	0930-1100	69-73	0-0	1-4; 1-4
6/25/2024	CAGN Survey #6	AM	1030-1130	80-82	0-0	1-2; 1-2
4/30/2025	Rare Plant Survey #1	JR	1220-1350	70-72	20-10	2-5; 2-5
4/30/2025	CBB Survey #1	IH	1220-1350	70-72	20-10	2-5; 2-5
5/30/2025	Rare Plant Survey #2, CBB Survey #2	IH	1100-1200	84-85	0-0	2-5; 2-5
6/26/2025	Rare Plant Survey #3, CBB Survey #3	JR	1230-1440	76-79	0-0	3-8; 3-8

AG = Alec Goodman, AM = Amanda Mathews, IH = Ian Hirschler, JR = Jim Rocks, KW = Kelsey Woldt, SM = Shannon Mindeman
CAGN = coastal California gnatcatcher, CBB = Crotch's bumble bee

3.1 DATABASE SEARCH

Prior to conducting field surveys, existing information regarding biological and aquatic resources present or potentially present within the project area was obtained through a review of pertinent literature and databases, including, but not limited to:

- CDFW California Natural Diversity Database (CNDDB; CDFW 2024a)
- CDFW Biogeographic Information and Observation System (BIOS; CDFW 2025)
- California Native Plant Society (CNPS) Electronic Inventory (CNPS 2024)
- Bumble Bee Watch (The Xerces Society et al. 2025)
- iNaturalist (iNaturalist 2025)
- eBird: An Online Database of Bird Distribution and Abundance (eBird 2025)
- USFWS Special-Status Species Database (USFWS 2025)
- USFWS Information for Planning and Consulting (IPaC) Database (USFWS 2024b)
- USFWS National Wetlands Inventory (NWI) Database (USFWS 2024c)
- Natural Resources Conservation Service (NRCS) Soils Survey Database (NRCS 2024)
- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) (USGS 2024)
- Google Earth Pro (2024)

Database results, along with local biological knowledge, were used for assessment of special-status species' potential for occurrence on or adjacent to the project site. The potential for occurrence tables created for the project include federally and state-listed species, candidate species, and other state-designated special-status species that have been reported within three miles of the project site (CNDDB and USFWS Special-Status Species Database) and determined to be potentially present in the IPaC Database, as well as California Rare Plant Rank (CRPR) 1 and 2

species that occur within the 'Nine Quads' search for the elevational range of the project site: 758-773 feet above mean sea level (amsl; CNPS 2024). The CNPS 'Nine Quads' search queries the USGS quadrangle in which the project site is located and the surrounding eight quadrangles. The potential for special-status species to occur within the project site was refined by considering the habitat affinities of each species, field habitat assessments, vegetation mapping, and knowledge of local biological resources.

3.2 VEGETATION MAPPING AND GENERAL BIOLOGICAL SURVEYS

RBC biologists conducted vegetation mapping in the field to provide a baseline of the biological resources that occur or have the potential to occur within the project site. RBC conducted vegetation mapping by walking throughout the project site and mapping vegetation communities on aerial photographs at a 1:1200 scale (1 inch = 100 feet).

The extent of each habitat type (delineated as a habitat polygon on the vegetation maps) was calculated using the Geographic Information System (GIS) application ArcGIS Collector. Habitats were classified based on the dominant and characteristic plant species in accordance with vegetation community classifications outlined in the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) and *The Manual of California Vegetation, 2nd Edition* (Sawyer et al. 2009).

RBC biologists conducted a general biological survey for plants and wildlife concurrently with vegetation mapping. Photos taken during the general biological survey are provided in Appendix A. Plant species encountered during the field survey were identified and recorded in field notebooks. Plant species that could not be identified were brought to the laboratory for identification using the dichotomous keys and taxonomic treatment outlined in the *Jepson Manual* (Baldwin et al. 2012). A complete list of the vascular plant species observed during all site visits to the project site is presented in Appendix B.

RBC conducted habitat assessments for special-status plants during the general biological field survey. Special-status plant species include those that are: 1) listed or proposed for listing by federal or state agencies as threatened or endangered; 2) CRPR 1 or 2 species (CNPS 2023); or 3) considered rare, endangered, or threatened by the CDFW (CDFW 2024c) or other local conservation organizations or specialists.

In the state of California, CNPS is a statewide resource conservation organization that has developed an inventory of California's sensitive plant species. The CRPR system is recognized by the CDFW and essentially serves as an early warning list of potential candidate species for threatened or endangered status. The CRPR system is categorized as outlined in Table 1.

Table 2. CRPR Definitions

CRPR	1A	presumed extirpated in California and rare or extinct elsewhere
	1B	rare, threatened, or endangered in California and elsewhere
	2A	presumed extirpated in California but more common elsewhere

	2B	rare, threatened, or endangered in California but more common elsewhere
	3	plants for which more information needed
	4	plants of limited distribution
CRPR Threat Ranks	0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
	0.2	Moderately 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)

Wildlife species were documented during the field survey by sight, calls, tracks, scat, or other signs, and were recorded in field notebooks. Binoculars (10X42 magnification) were used to aid in the identification of wildlife. In addition to species observed during the surveys, expected wildlife use of the project site was assessed based on known habitat preferences of local species and knowledge of their biogeographic distribution in the region. RBC conducted habitat assessments for special-status wildlife during the general biological field survey. Special-status wildlife species include those that are: 1) listed or proposed for listing by federal or state agencies as threatened or endangered; or 2) considered endangered, threatened, or rare by the CDFW (CDFW 2024c).

A list of wildlife species observed in the project site is presented in Appendix C; scientific and common names of wildlife follow CDFW's *Complete List of Amphibian, Reptile, Bird and Mammal Species in California* (CDFW 2016). Twilight/nighttime surveys were not conducted, therefore crepuscular and nocturnal animals are likely under-represented in the project species list; however, habitat assessments were performed for all special-status species to ensure that any potentially present rare species are adequately addressed herein.

If observed, the location of biological resources designated as special-status by the USFWS, CDFW, and/or CNPS, were recorded in field notebooks, on aerial maps, and/or through the use of Global Positioning System (GPS) units.

3.3 SPECIAL-STATUS SPECIES SURVEYS

3.3.1 FOCUSED RARE PLANT SURVEYS

RBC conducted focused rare plant surveys on April 30, May 30, and June 26, 2025. Three surveys were conducted to allow for detection of plants with disparate bloom periods. All suitable habitat within the project site and 50-foot buffer was surveyed on foot for special-status floral species with a potential to occur on site. The locations of any identified special-status plant species were recorded with estimated population sizes. All vascular plant species observed on site were identified to species, subspecies, or varietal level and a full list of plant species observed is available in Appendix B. Additional survey methods, details, and species lists can be found in Appendix D.

3.3.2 COASTAL CALIFORNIA GNATGATCHER BREEDING SEASON SURVEYS

HELIX conducted six site visits between May 17 and June 25, 2024 in accordance with the USFWS *Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Protocol* (USFWS 1997).The project site is not within a Natural Communities Conservation Plan (NCCP) program area. As such, the USFWS requires that a minimum of six surveys be conducted, at least one week apart, during the breeding season (March 15 and June 30) or a minimum of nine surveys be conducted, at least two weeks apart, during the non-breeding season (July 1 and March 14). On-site breeding season surveys were conducted at least seven days apart between 6 a.m. and 12 p.m.

Surveys were conducted by walking within and along the perimeter of suitable coastal California gnatcatcher habitat in the survey area. The survey area encompassed approximately 7.0 acres of potential coastal California gnatcatcher habitat within the proposed project site and within a 300-foot buffer from the project site. The survey route was arranged to ensure complete coverage of habitat with potential for occupancy by coastal California gnatcatcher. Surveys were conducted with binoculars to aid in bird detection. Recorded coastal California gnatcatcher vocalizations were played sparingly and only if other means of detection had failed. The approximate survey route and full survey methodology and results can be found in Appendix E.

3.3.3 FOCUSED CROTCH'S BUMBLE BEE SURVEYS

Two focused Crotch's bumble bee surveys were conducted by RBC senior biologist, Ian Hirschler, two to four weeks apart in April and May of 2025 within the time period when detection of Crotch's bumble bee is greatest (i.e., April through August). Mr. Hirschler holds a CDFW 2081(a) Memorandum of Understanding (MOU) to conduct presence/absence surveys for Crotch's bumble bee via capture and handle. One additional focused Crotch's bumble bee survey was conducted by RBC principal biologist Jim Rocks on June 26, 2025. The three focused surveys were performed in accordance with the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2024d).

Surveys were conducted by walking transects through the project site and 50-foot buffer, focusing on areas where ample nectar sources were present. Surveyors were prepared to record the location of any observed Crotch's bumble bee, along with population size and nesting status, and to collect non-lethal photo vouchers captured at various angles to confirm accurate identification. All arthropods and potential nectar sources were identified and recorded. Full survey methods, details, and species lists can be found in Appendix F.

3.4 RECONNAISSANCE LEVEL AQUATIC RESOURCES ASSESSMENT

RBC assessed the project site to identify areas that may be considered potentially jurisdictional under the Corps pursuant to Section 404 of the CWA; the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Act; or CDFW pursuant to CFGC §1602. Areas with depressions, drainage patterns, wetland vegetation, or riparian vegetation within the project site were assessed for potential jurisdictional status, with focus on the presence of defined channels, soils, and hydrology. No formal jurisdictional delineation was conducted as part of this effort.

4 RESULTS

This section provides results of the literature review, vegetation mapping, general biological survey, special-status species habitat assessments, focused surveys, and the aquatic resources assessment conducted for the project. For the purposes of this report, special-status biological resources are those defined as follows: 1) species that have been given special recognition by federal, state, or local conservation agencies and organizations due to limited, declining, or threatened/endangered population sizes; 2) species and habitat types recognized by local and regional resource agencies as sensitive; 3) habitat areas or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; 4) wildlife corridors and habitat linkages; and/or 5) biological resources that may or may not be considered sensitive, but are regulated under local, state, and/or federal laws.

4.1 PHYSICAL SETTING

The project site is located south of the intersection of Jesmond Dene Road and Quail Road in Escondido, San Diego County, California. The project site is immediately bordered by native habitat to the south and west and a recreational field and associated parking lot to the east. The greater area surrounding the project site is comprised of residential development in varying densities, as described in Section 2.1.

The project site itself is a relatively flat parcel that is bisected by multiple dirt walking/biking paths. Portions of the project site are being used as a bike park with dirt ramps and jumps. A large drainage is present north of the project boundary. The project site is largely comprised of disturbed land but also contains patches of disturbed coast live oak woodland and forest, disturbed coyote brush scrub, and disturbed California sycamore-coast live oak riparian woodland. On-site elevations range from approximately 758 to 773 feet amsl. Soils mapped on site include Visalia sandy loam, 0 to 2 percent slopes; Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded; and Ramona sandy loam, 2 to 5 percent slopes (NRCS 2024).

4.2 VEGETATION COMMUNITIES AND LAND USES

The project site supports a moderate diversity of vegetation communities and other land covers. Table 2 provides a summary of vegetation/land cover on the site and within the survey area, which are depicted on Figure 2.

Table 2. Summary of Vegetation Within the Project Site and Survey Area

Vegetation[1]	Vegetation (Holland)[2]	Global/ State Rank[3]	Project Site (acres)	Survey Area (site + buffer; acres)
California Sagebrush (Purple Sage) Scrub (*Artemisia californica* – [*Salvia leucophylla*] Shrubland Alliance)	Diegan Coastal Sage Scrub	G5/S5	0.00	5.20
Coast Live Oak Woodland and Forest (*Quercus agrifolia* Forest & Woodland Alliance)	Coast Live Oak Woodland	G5/S4	0.10	4.31

Vegetation[1]	Vegetation (Holland)[2]	Global/ State Rank[3]	Project Site (acres)	Survey Area (site + buffer; acres)
Developed Land (Developed/Disturbed)	Developed Land	No Rank	0.00	2.85
Disturbed California Sycamore-Coast Live Oak Riparian Woodland (*Platanus racemosa - Quercus agrifolia* Woodland Alliance)	Disturbed Southern Sycamore-Alder Riparian Woodland	S3/G3	0.51	2.08
Disturbed Coast Live Oak Woodland and Forest (*Quercus agrifolia* Forest & Woodland Alliance)	Disturbed Coast Live Oak Woodland	G5/S4	0.86	1.00
Disturbed Coyote Brush Scrub (*Baccharis pilularis* Shrubland Alliance)	Disturbed Northern Coyote Brush Scrub	S5/G5	0.28	0.32
Disturbed Land (Developed/Disturbed)	Disturbed Land	No Rank	2.63	5.58
Goodding's Willow-Red Willow Riparian Woodland and Forest (*Salix gooddingii – Salix laevigata* Forest & Woodland Alliance)	Southern Cottonwood-Willow Riparian Forest	G4/S3	0.00	0.13
		Total[4]	4.38	21.45

[1] Vegetation communities from The Manual of California Vegetation (Sawyer et al. 2009)
[2] Vegetation communities recognized by Holland (1986)
[3] Alliances with ranks of S1-S3 are considered Sensitive Natural Communities jurisdictional under CEQA (CDFW 2024b)
[4] Acreages summed using raw numbers provided during GIS analysis (available upon request) and thus the sum of the total rounded numbers may not directly add up in this table.

California Sagebrush (Purple Sage) Scrub (Artemisia californica – [Salvia leucophylla] Shrubland Alliance)

California sagebrush scrub does not occur on the project site. California sagebrush scrub within the survey area is dominated by California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and southern honeysuckle (*Lonicera subspicata*) but also contains sparse coast live oak (*Quercus agrifolia*) and stands of poison oak (*Toxicodendron pubescens*), amongst other species. California sagebrush scrub is abundant south of the project site within the survey area (Figure 2).

California sagebrush scrub is ranked as G5/S5, meaning it is "demonstrably secure because of its worldwide and statewide abundance" (CNPS 2023a); therefore, it is not considered a sensitive natural community under CEQA.

Coast Live Oak Woodland and Forest (Quercus agrifolia Forest & Woodland Alliance)

Coast live oak woodland and forest on the project site (0.10 acre) is dominated by the nominate species, coast live oak, as well as desert needle grass (*Stipa speciosa*). Red willow (*Salix laevigata*),

poison oak, and western sycamore (*Platanus racemosa*) are also present in lower densities. Coast live oak woodland and forest occurs within the project site in the large drainage along the northern border and at the southern extent of the project site (Figure 2).

Coast live oak woodland and forest is ranked as G5/S4, meaning it is "demonstrably secure because of its worldwide abundance" and "apparently secure statewide" (CNPS 2023a); therefore, it is not considered a sensitive natural community under CEQA.

Developed

Developed land supports little to no native vegetation and is composed of human-made structures and paved surfaces (buildings, pavement, etc.). Developed land does not occur on the project site. Developed land within the survey area occurs in the parking lot associated with the recreational field east of the project site and as paved roads north of the project site, specifically Jesmond Dene Road and Quail Road. (Figure 2).

Developed land is not recognized by CDFW (CDFW 2024b); therefore, it does not require further evaluation under CEQA.

Disturbed California Sycamore-Coast Live Oak Riparian Woodland (Platanus racemosa - Quercus agrifolia Woodland Alliance)

Disturbed California sycamore-coast live oak riparian woodland on the project site (0.51 acre) is similar to California sycamore-coast live oak riparian woodland; however, it has been substantially altered by human activities. Disturbed California sycamore-coast live oak riparian woodland occurs in the southeast of the project site (Figure 2). It is dominated by coast live oak and western sycamore with an understory of non-native grasses (e.g., *Bromus* sp.).

Disturbed California sycamore-coast live oak riparian woodland is ranked as G3/S3, meaning it is "vulnerable worldwide and statewide" (CNPS 2023a); therefore, it is considered a sensitive natural community under CEQA.

Disturbed Coast Live Oak Woodland and Forest (Quercus agrifolia Forest & Woodland Alliance)

Disturbed coast live oak woodland and forest on the project site (0.86 acre) is similar to coast live oak woodland and forest; however, it has been substantially altered by human activities. Disturbed coast live oak woodland and forest occurs throughout the center of the project site in disjunct patches (Figure 2). It is dominated by coast live oak; however, the herbaceous layer is made up of non-natives, such as short-pod mustard (*Hirschfeldia incana*), which colonized the area after grading activity.

Disturbed coast live oak woodland and forest is ranked as G5/S4, meaning it is "demonstrably secure because of its worldwide abundance" and "apparently secure statewide" (CNPS 2023a); therefore, it is not considered a sensitive natural community under CEQA.

Disturbed Coyote Bush Scrub (Baccharis pilularis Shrubland Alliance)

Disturbed coyote bush scrub on the project site (0.28 acre) is similar to coyote bush scrub; however, it has been substantially altered by human activities. Disturbed coyote bush scrub occurs in disjunct patches throughout the center of the project site (Figure 2). It is dominated by the

nominate species, coyote brush (*Baccharis pilularis*). This area was previously graded; therefore, the herbaceous layer is now comprised of non-native grasses and annuals.

Disturbed coyote bush scrub is ranked as G5/S5, meaning it is "demonstrably secure because of its worldwide and statewide abundance (CNPS 2023a);" therefore, it is not considered a sensitive natural community under CEQA.

Disturbed

Disturbed land is typically classified as land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and site conditions are not characteristic of the disturbed phase of a plant association (e.g., disturbed coastal sage scrub). Disturbed habitat is typically found in vacant lots, along roadsides, within construction staging areas, and in abandoned fields. The habitat is typically dominated by non-native annual species and perennial broadleaf species.

Disturbed land occurs throughout the majority of the project site, surrounding smaller areas of disturbed native habitat (Figure 2). Disturbed land on the project site (2.63 acres) is primarily vegetated by non-native species such as slender wild oat (*Avena barbata*) and short-pod mustard. Few scattered native species occur throughout the disturbed habitat, including doveweed (*Croton setiger*) and western ragweed (*Ambrosia psilostachya*); however, they are isolated occurrences and do not function as separate vegetation communities or land cover types.

Disturbed habitat is not recognized by CDFW (CDFW 2024b); therefore, it is not considered a sensitive natural community under CEQA.

Goodding's Willow-Red Willow Riparian Woodland and Forest (Salix gooddingii – Salix laevigata Forest & Woodland Alliance)

Goodding's willow-red willow riparian woodland and forest does not occur on the project site. Goodding's willow-red willow riparian woodland and forest within the survey area is dominated by red willow, Mexican fan palm (*Washingtonia robusta*), tamarisk (*Tamarix ramosissima*), and mulefat (*Baccharis salicifolia*). The herbaceous layer is comprised of red brome (*Bromus rubens*) and desert needle grass, amongst other species. Goodding's willow-red willow riparian woodland and forest within the survey area occurs at the western end of the drainage along the northern border of the project site. Human disturbances within this vegetation community include trash dumping and invasive plant colonization.

Goodding's willow-red willow riparian woodland and forest is ranked as G4/S3, meaning it is "apparently secure worldwide" and is "vulnerable statewide" (CNPS 2023a); therefore, it is considered a sensitive natural community under CEQA.

4.3 PLANTS AND WILDLIFE

The project site supports a moderate diversity of wildlife and plant species. A total of 78 plant species (34 percent non-native, 66 percent native) were observed during biological surveys (Appendix B). Three reptile species, 31 bird species, one mammal species, and 14 invertebrates were observed during the surveys (Appendix C). Twilight or nighttime surveys were not conducted;

therefore, crepuscular and nocturnal animals are likely under-represented in the project species list. However, habitat assessments were performed for all special-status species to ensure that any potentially present rare species are adequately addressed herein.

4.3.1 SPECIAL−STATUS PLANT SPECIES

No federally or state threatened or endangered plant species were observed on the project site during the general biological survey or focused rare plant surveys. Four special-status plant species have a moderate potential to occur on the project site but were not observed within the survey area: California adolphia (*Adolphia californica*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), delicate clarkia (*Clarkia delicata*), and summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*). No additional special-status plant species were observed during focused rare plant surveys or have a moderate or high potential to occur within the project site based on the absence of suitable habitat (Table 3).

Please note that CRPR 3 and 4 species were omitted from the potential to occur analysis below in accordance with CEQA standards due to their relatively low threat status. Special-status plant species with low or no potential to occur on the project site are not addressed further in this report. Because these species have low or no potential for occurrence, no impacts are anticipated on these species. A full list of special-status plant's statuses, habitat descriptions, and potential to occur on site is presented in Table 3 below.

Table 3. Assessment of Special-Status Plant Species Potential to Occur

Species	Status	Habitat Description	Potential to Occur
California adolphia (*Adolphia californica*)	CRPR 2B.1	Perennial deciduous shrub. Blooms December-May. Habitat includes coastal sage scrub, coastal chaparral, valley and foothill grassland. Elevation 0-1315 ft.	**Not observed.** Determined to have moderate potential to occur during the general biological survey; however, targeted rare plant surveys in 2025 were negative.
Chaparral nolina (*Nolina cismontane*)	CRPR 1B.2	Perennial evergreen shrub. Blooms May-July. Habitat includes chaparral and coastal sage scrub. Elevation 656-4265 ft.	**Low.** While California sagebrush scrub is present adjacent to the project site, the species is identifiable year-round and was not observed during biological surveys conducted in 2023.
Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)	CRPR 1B.2	Annual herb. Blooms February-June. Habitat includes salt-marsh, vernal pools, and playas. Elevation 5-4005 ft.	**None.** The site does not contain suitable habitats that could support the species.

Species	Status	Habitat Description	Potential to Occur
Coulter's saltbush (*Atriplex coulteri*)	CRPR 1B.2	Perennial herb. Blooms April-November. Habitat includes coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grasslands. Elevation 10-1510 ft.	**None.** This species is typically found coastally and is closely associated with alkaline soils that are not present on site.
Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*)	CRPR 1B.2	Perennial shrub. Blooms April-November. Habitat includes chaparral and coastal scrub with sandy soils, often in disturbed areas. Elevation 35-820 ft.	**Not observed.** Determined to have moderate potential to occur during the general biological survey because the survey area is within the species' elevational range and suitable disturbed scrub habitat with sandy soils is present on site; however, targeted rare plant surveys in 2025 were negative.
Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*)	CRPR 1B.1	Perennial evergreen shrub. Blooms December-July. Found in chaparral (maritime, sandy). Elevation 0-1200 ft.	**None.** The site does not contain suitable habitats that could support the species; would likely have been observed if present.
Delicate clarkia (*Clarkia delicata*)	CRPR 1B.2	Annual herb. Blooms April-June. Habitat includes chaparral and Cismontane woodland often on gabboric soils. Elevation 770-3280 ft.	**Not observed.** Determined to have moderate potential to occur during the general biological survey because the survey area is within the species' elevational range and suitable disturbed woodland habitat is present on site; however, targeted rare plant surveys in 2025 were negative.
Encinitas baccharis (*Baccharis vanessae*)	FT, SE, CRPR 1B.1	Perennial deciduous shrub. Blooms (August) October-November. Habitat includes chaparral (maritime) and cismontane woodland on sandstone soils. Elevation 196-2,363 ft.	**None.** While the site is within the elevational range and disturbed cismontane woodland habitat is present, this species is closely associated with sandstone soils that are not present on site.
Lakeside ceanothus (*Ceanothus cyaneus*)	CRPR 1B.2	Perennial evergreen shrub. Blooms April -June. Habitat includes chaparral and closed-cone coniferous forest. Elevation 770-2475 ft.	**None.** The site does not contain suitable habitats that could support the species.

Species	Status	Habitat Description	Potential to Occur
Mesa horkelia (*Horkelia cuneata* var. *puberula*)	CRPR 1B.1	Perennial herb. Blooms February-July (September). Habitat includes chaparral (maritime), cismontane woodland on gravelly and sandy soils (sometimes). Elevation 230-2660 ft.	Low. The site is within the elevational range and disturbed cismontane woodland is present; however, the species is not known from the project vicinity (Calflora 2024).
Munz's sage (*Salvia munzii*)	CRPR 2B.2	Perennial evergreen shrub. Blooms February-April. Habitat includes chaparral and costal scrub. Elevation 375-3495 ft.	Low. Site is within the elevational range and disturbed scrub habitat is present; however, the species is uncommon in the vicinity of the project.
Nevin's barberry (*Berberis nevinii*)	FE, SE, CRPR 1B.1	Perennial evergreen shrub. Blooms (February) March-June. Habitat includes chaparral, cismontane woodland, coastal scrub, and riparian scrub. Elevation 230-2705 ft.	Low. Site is within the elevation range and disturbed scrub and riparian scrub habitats are present; however, the species is extremely limited in San Diego County and not known from the project vicinity (Calflora 2024).
Nuttall's scrub oak (*Quercus dumosa*)	CRPR 1B.1	Evergreen shrub. Blooms February-April (May). Habitat includes chaparral, closed-cone coniferous forest, and coastal sage. Elevation 0-656 ft.	Low. Site is within the elevation range and coastal scrub habitats are present; however, the species is not known from the project vicinity (Calflora 2025) and was not observed during the focused rare plant surveys.
Orcutt's brodiaea (*Brodiaea orcuttii*)	CRPR 1B.1	Perennial bulbiferous herb. Blooms May-July. Habitat includes closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, and vernal pools on mesic and clay soils. Elevation 100-5,550 ft.	None. The site does not contain suitable vernal pool habitat that could support the species.

Species	Status	Habitat Description	Potential to Occur
Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*)	CRPR 1B.1	Perennial evergreen shrub. Blooms (July) September-November. Habitat includes chaparral and coastal scrub on mesic soils. Elevation 100-1970 ft.	Low. Although the site supports disturbed scrub habitat, the species is not known from the project vicinity and is typically found in the southern portion of the County (Calflora 2024).
Parish's brittlescale (*Atriplex parishii*)	CRPR 1B.1	Annual herb. Blooms June-October. Found in alkaline habitats including chenopod scrub, playas, and vernal pools. Elevation 80-6235 ft.	None. The site does not contain suitable habitats that could support the species.
Parry's tetracoccus (*Tetracoccus dioicus*)	CRPR 1B.2	Perennial deciduous shrub. Blooms April-May. Habitat includes chaparral and coastal scrub. Elevation 540-3280 ft.	Low. Although the site is within elevation range and disturbed coastal scrub is present (disturbed coyote bush scrub) on site, the species is usually found on dry slopes in chaparral which are not present on site.
Purple stemodia (*Stemodia durantifolia*)	CRPR 2B.1	Perennial herb. Blooms (January) April, June, August, September, October, December. Typically found in mesic and sandy wetland and riparian habitats. Elevation 590-985 ft.	Low. The site is within the elevational range and supports and disturbed riparian woodlands with mesic soils are present adjacent to the project site but are not located within the project boundaries.
Rainbow manzanita (*Arctostaphylos rainbowensis*)	CRPR 1B.1	Perennial evergreen shrub. Blooms December-March. Found in Chaparral. Elevation 670-2200 ft.	None. The site does not contain suitable habitats that could support the species.
Ramona horkelia (*Horkelia truncata*)	CRPR 1B.3	Perennial herb. Blooms May-June. Found in chaparral and cismontane woodland. Elevation 1310-4265 ft.	None. Although the species is known within 3 miles of the site, and suitable disturbed cismontane woodland is present, the site is outside the known elevational range of this species.

Species	Status	Habitat Description	Potential to Occur
San Bernardino aster (*Symphyotrichum defoliatum*)	CRPR 1B.2	Perennial rhizomatous herb. Blooms July-November. Habitat includes freshwater-marshes and streambanks occurring in coastal sage scrub, cismontane woodland, lower montane coniferous woodland, swamps, meadows, and valley and foothill grassland (vernally mesic). Elevation 5-6695 ft.	**Low.** Site is within the elevational range and supports streambank habitats within cismontane woodland (disturbed coast live oak woodland and forest), the species is not known from the project vicinity and typically found in the eastern portion of the County (Calflora 2024).
San Diego ambrosia (*Ambrosia pumila*)	FE, CRPR 1B.1	Perennial rhizomatous herb. Blooms April-October. Habitat includes chaparral, coastal scrub, valley and foothill grassland, and vernal pools in sandy loam or clay soils. Elevation 65-1360 ft.	**Low.** Site is within the species' elevational range and supports suitable disturbed and scrub habitat with sandy loam soils. However, the species is not known from the project vicinity (Calflora 2024).
San Diego barrel cactus (*Ferocactus viridescens*)	CRPR 2B.1	Perennial stem succulent. Blooms May-June. Habitat includes chaparral, coastal scrub, valley and foothill grassland, and vernal pools. Elevation 10-1475 ft.	**Low.** While the site is within the elevational range and supports suitable disturbed scrub habitat, the species is not known from the project vicinity and species would likely have been observed if present on site (Calflora 2024).
San Diego button-celery (*Eryngium aristulatum* var. *parishii*)	FE, SE, CRPR 1B.1	Annual/perennial herb. Blooms April-June. Mesic habitats in coastal scrub, valley and foothill grassland, and vernal pools. Elevation 65-2035 ft.	**None.** The site does not contain suitable habitats that could support the species.
San Diego goldenstar (*Bloomeria clevelandii*)	CRPR 1B.1	Perennial bulbiferous herb. Blooms April-May. Occurs on clay soils in chaparral, coastal scrub, valley and foothill grassland, and vernal pools. Elevation 164-1525 ft.	**None.** The site does not contain suitable habitats that could support the species.
San Diego marsh-elder (*Iva hayesiana*)	CRPR 2B.2	Perennial herb. Blooms April-October. Occurs in marshes, swamps and playas. Elevation 32-1640 ft.	**Low.** The site contains very limited suitable habitat for this species.

Species	Status	Habitat Description	Potential to Occur
San Diego thornmint (*Acanthomintha ilicifolia*)	FT, SE, CRPR 1B.1	Annual herb. Blooms April-June. Habitat includes chaparral, coastal scrub, valley and foothill grassland, vernal pools. Elevation 30-3150 ft.	**None.** The site does not contain suitable habitats that could support the species.
Smooth tarplant (*Centromadia pungens* ssp. *laevis*)	CRPR 1B.1	Annual herb. Blooms April-September. Habitat includes chenopod scrub, meadows and seeps, playa, riparian woodland, and valley and foothill grassland. Elevation. 0-2100 ft.	**None.** The site does not contain suitable habitats that could support the species.
Southern tarplant (*Centromadia parryi* ssp. *australis*)	CRPR 1B.1	Annual herb. Blooms May-November. Habitat includes marshes and swamps (margins), valley and foothill grassland (vernally mesic), vernal pools. Elevation 0-1575 ft.	**None.** The site does not contain suitable habitats that could support the species.
Spreading navarretia (*Navarretia fossalis*)	FT, CRPR 1B.1	Annual herb. Blooms April-June. Habitat includes chenopod scrub, marshes and swamps (assorted shallow freshwater), playas, vernal pools. Elevation 95-2150 ft.	**None.** The site does not contain suitable habitats that could support the species.
Sticky dudleya (*Dudleya viscida*)	CRPR 1B.2	Perennial herb. Blooms May-June. Habitat includes coastal bluff scrub, chaparral, cismontane woodland, coastal scrub. Elevation 30-1,805 ft.	**Low.** The site is within the elevational range and supports disturbed coastal scrub. However, the species prefers coastal, rocky habitat.
Summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*)	CRPR 1B.2	Perennial evergreen shrub. Blooms April-June. Habitat includes chaparral, cismontane woodland. Elevation 98-2,592 ft.	**Not observed.** Determined to have moderate potential to occur during the general biological survey because the survey area is within the species' elevational range and supports suitable disturbed cismontane woodland; however, targeted rare plant surveys in 2025 were negative.

Species	Status	Habitat Description	Potential to Occur
Thread-leaved brodiaea (*Brodiaea filifolia*)	FT, SE, CRPR 1B.1	Perennial bulbiferous herb. Blooms March-June. Found in often clay soils in chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools. Elevation 80-3,675 ft.	Low. Though the site supports scrub and cismontane woodland habitats, clay soils are not present on site.
Variegated dudleya (*Dudleya variegata*)	CRPR 1B.2	Perennial herb. Blooms April-June. Habitat includes chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools. Elevation 10-1905 ft.	Low. Though the site supports disturbed scrub and cismontane woodland habitats, clay soils are not present on site.
Wart-stemmed ceanothus (*Ceanothus verrucosus*)	CRPR 2B.2	Perennial evergreen shrub. Blooms December-May. Found in chaparral. Elevation 5-1245 ft.	None. The site does not contain suitable habitats that could support the species. Would have been observed if present.
Willowy monardella (*Monardella viminea*)	FE, SE CRPR 1B.1	Perennial herb. Blooms June-August. Found in sandy bottoms or banks of ephemeral washes in coastal sage scrub and riparian shrub communities. Elevation 5-1312 ft.	Low. Although the site is within elevation range, and supports disturbed scrub and riparian habitats, the species is not known from the project vicinity and is typically found in the southern portion of the County (Calflora 2024).

CRPR: California Rare Plant Rank
FE: ESA Federally Endangered species
FT: ESA Federally Threatened Species
SE: CESA State Endangered Species

4.3.2 SPECIAL-STATUS WILDLIFE SPECIES

No federally or state threatened or endangered wildlife species were observed on the project site; however, three special-status species, coastal whiptail, oak titmouse, and wrentit, were documented during the general biological survey. One closely related non-listed special-status species, orange-throated whiptail (*Aspidoscelis hyperythra*), and one avian non-listed special-status species, Cooper's hawk (*Accipiter cooperii*), have high potential to occur on the project site. Additionally, the federally threatened coastal California gnatcatcher and the state candidate for listing under CESA Crotch's bumble bee have moderate-to-high potential to occur immediately adjacent to the project site but were not detected during focused species surveys. Four additional non-listed special-status species have a moderate potential to occur on the project site, including coast horned lizard (*Phrynosoma blainvillii*), red-diamond rattlesnake (*Crotalus ruber*), southern California legless lizard (*Anniella stebbinsi*), and western yellow bat (*Lasiurus xanthinus*). Lastly, two

species have a low-to-moderate potential to occur on the project site: least Bell's vireo and big free-tailed bat (*Nyctinomops macrotis*).

Special-status wildlife species with low or no potential to occur on the project site are not addressed further in this report. Because these species have low or no potential for occurrence, no impacts are anticipated on these species. A full list of special-status wildlife's statuses, ecological requirements, and potential to occur on site is presented in Table 4 below.

Table 4. Assessment of Special-Status Wildlife Species Potential to Occur

Species	Status	Habitat	Potential to Occur
INVERTEBRATES			
Crotch's bumble bee (*Bombus crotchii*)	CS	Arid shrublands and grasslands in coastal and foothill areas of southern California. Nectar plants include milkweeds, buckwheat, and lupines.	Not Observed. Habitat on the project site has very low potential to support this species due to lack of nectar sources, absence of suitable nesting burrows, and soil compaction; however, adjacent native habitat has moderate-to-high potential to support Crotch's bumble bee due to the presence of floral resources. Focused surveys conducted in 2025 were negative.
Monarch – California overwintering population (*Danaus plexippus* pop. 1)	FC	Found in open fields and meadows with milkweed in the summer. Found in a variety of habitats with nectar sources during the winter. Roost in eucalyptus, Monterey pines, and Monterey cypresses in California.	Low. Nectar sources observed during biological survey; however, the site does not support suitable roosting habitat.
AMPHIBIANS			
Western spadefoot (*Spea hammondii*)	SSC	Found in temporary ponds, vernal pools, and backwaters of flowing creeks, as well as adjacent upland habitats such as grasslands and coastal sage scrub for burrowing.	Low. Species prefers temporary ponds and vernal pools that are not present on site. However, disturbed scrub habitat is present on site that could support burrowing. Species is known to occur within three miles.

Species	Status	Habitat	Potential to Occur
REPTILES			
Coast horned lizard (*Phrynosoma blainvillii*)	SSC	Inhabits open areas of sandy soils and low vegetation in a variety of habitats including coastal sage scrub, chaparral, foothill woodlands, conifer and riparian habitats, as well as in pine-cypress, juniper and annual grassland habitats.	**Moderate.** Species is known from the project vicinity and has been documented within one mile of the project site. The site supports suitable disturbed woodland and scrub habitats.
Coastal whiptail (*Aspidoscelis tigris stejnegeri*)	SSC	Prefers hot and dry open areas with sparce foliage in chaparral, woodland, and riparian habitats.	**Observed.** Species observed on site during general biological survey on September 6, 2023.
Orange-throated whiptail (*Aspidoscelis hyperythra*)	WL	Found in a variety of open and arid habitats including coastal sage scrub, woodlands, and washes.	**High.** Species is known from the project vicinity and has been documented within three miles of the project site. The site supports open areas in suitable disturbed woodland and scrub habitats.
Red-diamond rattlesnake (*Crotalus ruber*)	SSC	Found on arid slopes within coastal sage scrub and chaparral containing rocky outcrops.	**Moderate.** Species is known from the project vicinity and has been documented within one mile of the project site. The site supports open areas in disturbed scrub habitat.
Southern California legless lizard (*Anniella stebbinsi*)	SSC	Found in a variety of habitats, including coastal sage scrub and chaparral, with loose, sandy soils. Often sound in washes and alluvial fans, or under leaf litter under trees or bushes in sunny areas.	**Moderate**. Species is from the project vicinity and has been documented within three miles of the project site. The site supports disturbed scrub habitat, areas with suitable loose sandy soil, and leaf litter in sunny areas.
BIRDS			
Bald eagle (*Haliaeetus leucocephalus*)	FP, SE	Found within a variety of habitats, though prefer tall mature coniferous and deciduous forests for perching, and nest in forested areas adjacent to large bodies of water.	**Low.** Site lacks suitable nesting and foraging habitat.
Burrowing owl (*Athene cunicularia*)	SSC	Found in grasslands and open scrub from the coast to foothills. Strongly associated with California ground squirrel (*Otospermophilus beecheyi*) and other fossorial mammal burrows.	**Low.** Although at least one suitable burrow is present on site, the lack of open, commanding views (i.e., abundance of tall woodland trees) make the site unsuitable for the species.

Species	Status	Habitat	Potential to Occur
California black rail (*Laterallus jamaicensis coturniculus*)	FP, SE	Found in marshland with unrestricted tidal influence (estuarine, intertidal, emergent, regularly flooded).	None. The site does not contain suitable habitats that could support the species.
Coastal California gnatcatcher (*Polioptila californica californica*)	FT, SSC	Found in coastal sage scrub habitats including Diegan coastal sage scrub, often dominated by California buckwheat and California sagebrush.	Not Observed. Habitat on the project site has very low potential to support this species; however, California sagebrush scrub found adjacent to the project site has moderate-to-high potential to support coastal California gnatcatcher. Species is known from the project vicinity and has been documented within three miles of the project site; however focused surveys on the project site in 2024 were negative.
Cooper's hawk (*Accipiter cooperii*)	WL	Found in a variety of habitats including woodlands, shrublands, and urban areas. Nests in woodlands, often near rivers and streams.	High. Species is known from the project vicinity. High potential to forage and moderate potential to nest on the project site due to the presence of suitable nesting trees.
Golden eagle (*Aquila chrysaetos*)	FP, WL	Found in mountainous canyonlands, deserts, agricultural fields, and semi-open habitats.	Low. Site lacks suitable nesting and foraging habitat
Least Bell's vireo (*Vireo bellii pusillus*)	FE, SE	Breeds in dense riparian forests and riparian scrub habitats with dense understories.	Low-to-Moderate. Species is known from the project vicinity and has been documented within one mile of the site. A small area of suitable Goodding's willow-red willow riparian woodland and forest is present adjacent to the project site; however, the on-site disturbed California sycamore-coast live oak riparian woodland and adjacent coast live oak woodland and forest lack the dense understory preferred by this species.
Oak titmouse (*Baeolophus inornatus*)	BCC	Found in a variety of habitats with oak species, including coast oak woodlands and foothill riparian habitats.	Observed. Species observed adjacent to the site within coast live oak woodland and forest during the general biological survey.

Species	Status	Habitat	Potential to Occur
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)	WL	Found in coastal sage scrub and chaparral habitats, often containing rock outcrops.	**Low.** Species is known from the project vicinity and has been documented within one mile of the site. While suitable scrub habitat occurs adjacent to the project site, no suitable habitat for this species occurs on site.
Southwestern willow flycatcher (*Empidonax traillii extimus*)	FE, SE	Found in dense riparian woodlands and forests. Often nests on or near lakes, streams, and rivers.	**Very Low.** Although the project site supports disturbed riparian forests and woodlands, the site lacks the presence of permanent water which is preferred by the species.
Swainson's hawk (*Buteo swainsoni*)	ST	Found in open habitats for foraging including grasslands, prairies, and sometimes pastures. Nest in solitary trees or sometimes very small groves near water.	**Low.** No suitable foraging habitat is present on site. Some solitary trees on site could be suitable for nesting; however, the species has not been reported nesting within the project vicinity since 1923.
Tricolored blackbird (*Agelaius tricolor*)	ST, SSC	Found nesting in grasslands and wetlands with cattails, bulrushes, and willows. Forages in cultivated fields, feedlots associated with dairy farms, and wetlands.	**None.** The site does not contain suitable habitats that could support the species.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FT, SE	Found primarily in wooded habitat with dense cover and water nearby, including woodlands with low, scrubby, vegetation, overgrown orchards, abandoned farmland and dense thickets along streams and marshes.	**Low.** Although the site supports disturbed riparian forests and woodlands, the site lacks the presence of permanent water which is preferred by the species.
White-faced ibis (*Plegadis chihi*)	WL	Found in salt, brackish, freshwater marshes, and agricultural fields.	**None.** The site does not contain suitable habitats that could support the species.
Wrentit (*Chamaea fasciata*)	BCC	Found in chaparral and scrub habitats with dense shrubs for cover.	**Observed.** Species observed adjacent to the site within California sagebrush scrub during the general biological survey.
MAMMALS			
American badger (*Taxidea taxus*)	SSC	Found in arid, open grasslands, fields, and pastures containing firm soil for burrowing. American badger may also be found in marshes and deserts.	**Low.** Suitable foraging habitat not present. Furthermore, burrows capable of supporting this species were not observed during project surveys.

Species	Status	Habitat	Potential to Occur
Big free-tailed bat (*Nyctinomops macrotis*)	SSC	Found in rocky areas in rugged or hilly country in both lowland and highland areas, including evergreen forest, woodlands, desert scrub, river floodplain-arroyo associations, and stream courses in areas of mixed tropical deciduous forest and thorn forest.	**Low-to-Moderate.** Project site supports suitable disturbed woodlands and forests. The site lacks the species' preferred rocky-hilltop-crevice roosting habitat; however, they occasionally roost in trees.
Pallid bat (*Antrozous pallidus*)	SSC	Found in a variety of arid habitats including grasslands, shrublands, woodlands, and forests from sea level up through mixed conifer forests. The species is most common in open, dry habitats with rocky areas for roosting.	**Low.** Suitable foraging habitat is present; however, suitable roosting and preferred rocky habitats are not present on site.
Pocketed free-tailed bat (*Nyctinomops femorosaccus*)	SSC	Found in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis. Prefers rock crevices in cliffs as roosting sites.	**None.** The site does not contain suitable habitats that could support the species.
Townsend's big-eared bat (*Corynorhinus townsendii*)	SSC	Found in a variety of habitats including coastal sage scrub and arid scrub habitats. Roosts in mines, caves, tunnels, and abandoned buildings.	**Low.** Suitable foraging habitats are present on site; however, cavity roosts that could support this species are absent.
Western yellow bat (*Lasiurus xanthinus*)	SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees.	**Moderate.** Suitable riparian woodland habitats are present on site.

Notes:
BCC: USFWS Bird of Conservation Concern
FC: Federal candidate for listing under ESA
FE: Federally Endangered
FP: CDFW Fully Protected Species
FT: Federally Threatened
SC: State candidate for listing under CESA
SE: State Endangered
ST: State Threatened
SSC: CDFW Species of Special Concern
WL: CDFW Watch List Species

Threatened and Endangered Wildlife Species

Coastal California Gnatcatcher

The coastal California gnatcatcher is federally listed as threatened and is considered a CDFW SSC. This species is a year-round resident of southern California and is found in the six southernmost California counties located within the coastal plain (San Bernardino, Ventura, Los Angeles, Orange, San Diego, and Riverside).

The primary cause of this species' decline is conversion of coastal sage scrub vegetation to urban and agricultural uses. USFWS has estimated that coastal sage scrub habitat has been reduced by 70 to 90 percent of its historical extent (USFWS 1993). Coastal California gnatcatcher generally inhabits Diegan coastal sage scrub and Riversidian coastal sage scrub dominated by California sagebrush and flat-topped buckwheat, generally below 1,500 feet in elevation along the coastal slope. When nesting, this species typically avoids slopes greater than 25% with dense, tall vegetation. Gnatcatcher pairs will attempt several nests each year (average of four), each placed in a different location inside their breeding territory, but most nest attempts are unsuccessful due to depredation by a variety of species (Grishaver et al. 1998; Atwood and Bontrager 2001). Clutch size ranges from one to five eggs, with three or four eggs most common. Males and females will remain paired through the non-breeding season and will often expand their home range when not breeding.

This species is particularly vulnerable to habitat destruction and fragmentation because of their low dispersal rate, reliance on a specific habitat type, and low breeding success. Coastal California gnatcatcher been described as "an obligate resident of coastal sage scrub" (Atwood and Bontrager 2001), a vegetation community that is vulnerable to urban pressures. The destruction of coastal sage scrub by wildfire also has a detrimental effect on local populations. This species also inhabits chaparral vegetation where adjacent to coastal sage scrub.

Coastal California gnatcatcher was not observed during general biological surveys; however, USFWS critical habitat overlaps with the project site and this species has been reported near the project site and within a surrounding three miles radius (eBird 2024; CDFW 2024a). Highly suitable habitat occurs immediately adjacent the site the form of California sagebrush scrub. On-site disturbed coyote brush scrub has very low potential to support this species. USFWS protocol presence/absence surveys were conducted by HELIX between May 17 and June 25, 2024, and coastal California gnatcatcher was not detected on site or within a 300-foot buffer from the project site. Full survey results are provided in Appendix E.

Crotch's Bumble Bee

The Crotch's bumble bee is currently a candidate for listing under the CESA based on a 2018 petition submitted by the Xerces Society for Invertebrate Conservation, Defenders of Wildlife and Center for Food Safety (CDFW 2022). This species has historically ranged from central California to Baja California Del Norte though recent records indicate a reduction at longitudinal extremes, with most detections occurring in southern California (Thorp et al., 1983, NatureServe Explorer 2025, Williams et al. 2014). Largely absent from mountainous regions, Crotch's bumble bee is distributed from the coast, east to the desert edge (Thorp et al., 1983, Williams et al. 2014).

Suitable habitat for this species includes a variety of open shrub and grassland vegetation communities containing ample flowers for nectaring. Due to their short tongue, Crotch's bumble bee tend to nectar on Medicago, Lupinus, Chaenactis, Asclepias, Phacelia, and Salvia, amongst a variety of other genera (Williams et al. 2014). Though Crotch's bumble bee is tolerant of fragmented and/or semi-urban environments, habitat loss, climate change, and pesticide use are considered imminent threats to populations (Williams et al. 2014; CDFW 2022).

Crotch's bumble bee has been recorded within seven miles of the project site near the Double Peak Regional Park in 2020 (CDFW 2025) and within eight miles of the project site near the San Dieguito River in 2020 (CDFW 2025). Due to the presence of scrub habitat and nectar sources appropriate for Crotch's bumble bee within habitat adjacent to the project site, focused surveys were conducted between April 30 and June 26, 2025. No Crotch's bumble bee individuals were documented within the project site or a 50-foot buffer during focused surveys. Full survey results are provided in Appendix F.

Least Bell's Vireo

Least Bell's vireo is federally and state-listed as endangered. Historically, this species was a common summer visitor to riparian habitat throughout much of California. The species is now found only in riparian woodlands in southern California, with the majority of breeding pairs in San Diego, Santa Barbara, and Riverside Counties. Least Bell's vireo is a migratory species, which typically arrives in southern California in late March or early April and leaves for its wintering ground in September.

This species is restricted to riparian woodland and is most frequent in areas that include an understory of dense young willows or mulefat with a canopy of tall willows. Least Bell's vireo typically builds its nests along edges of riparian thickets (Unitt 2004) approximately three feet above the ground.

The decline of Least Bell's vireo has been attributed primarily to habitat loss, degradation, and fragmentation combined with brood and nest parasitism by brown-headed cowbird (*Molothrus ater*; Goldwasser et al. 1980). Significant effort has been focused on preserving, enhancing, and creating suitable nesting habitat for the species, and extensive cowbird control programs have helped this species' populations rebound along several of its breeding drainages in southern California (Durst et al. 2006).

Least Bell's vireo was not observed during the general biological survey conducted September 6, 2023; however, suitable nesting and foraging habitat for this species occurs just west of the project site within the limited Goodding's willow-red willow riparian woodland and forest mapped within the survey area. This species is known from the project vicinity and has been recorded within one mile of the project site (CDFW 2024a). As such, least Bell's vireo has a low-to-moderate potential to occur within riparian habitat adjacent to proposed development.

Other Special-Status Wildlife Species

Big Free-tailed Bat

Big free-tailed bat is a CDFW SSC which occurs from high elevation forests to low elevation desert scrub vegetation communities throughout the southwest in New Mexico, Arizona, Texas, and rarely, California (Zeiner et al. 1988-1990). Ecological data from California is sparse; however, big free-tailed bats in other states are known to roost in buildings, caves, rocky outcrops, high cliffs, and tree holes (Zeiner et al. 1988-1990). Reproduction occurs in small breeding colonies in elevated cliff crevices and has not been recorded in California (Zeiner et al. 1988-1990). Big free-tailed bats consume moths mid-air and tend to be found in rocky canyons near large ponds (Zeiner et al. 1988-1990). Threats to big free-tailed bat require more research; however, this species is likely susceptible to roost and forage site degradation which causes population declines in other Chiropterans (Texas Parks and Wildlife n.d.).

Big free-tailed bat was not observed during the general biological survey conducted September 6, 2023; however, suitable, but not preferred, roosting habitat for this species occurs within coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, and disturbed coast live oak woodland and forest on the project site. As such, this species has a low-to-moderate potential to occur on the project site.

Coast Horned Lizard

Coast horned lizard also known as Blainville's horned lizard, is a CDFW SSC and occurs in the Sierra Nevada foothills from Butte County to Kern County and throughout the central and southern California coast, south to northern Baja California, Mexico (Zeiner et al. 1988-1990). The coast horned lizard inhabits grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil. In southern California, the species is most often found where its prey, native ants, are present, and little to no invasive Argentine ants (*Linepithema humile*) are found, as these are not a suitable replacement food source (Suarez et al. 2000). Threats to this species include habitat loss and fragmentation, the spread of invasive ants displacing its native ant prey, and exploitation by the pet trade (Nafis 2023).

Coast horned lizard was not observed during the general biological survey conducted September 6, 2023; however, suitable habitat for this species occurs within coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, and disturbed coast live oak woodland and forest on the project site. As such, the potential for this species to occur on the project site is moderate.

Coastal Whiptail

Coastal whiptail, also known as San Diego tiger whiptail, is a subspecies of the tiger whiptail and is designated a CDFW SSC. They are found in a variety of rocky, sandy, dry habitats including sage scrub, chaparral, woodlands on friable loose soil (Morey 2000). This species is wary, very active, and difficult to approach, typically foraging near cover and capable of quick busts of speed into brush or holes. Coastal whiptails prey upon small invertebrates, especially spiders, scorpions, centipedes, and termites, and small lizards (Nafis 2023). Females lay one clutch of eggs per year

and eggs hatch from May to August (Stebbins et al. 2012). The coastal whiptail is threatened by habitat loss and fragmentation due to development.

Coastal whiptail was documented in the scrub habitat within the eastern project site buffer during the September 6, 2023 general biological survey (Figure 2). Suitable habitat for this species occurs within coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, disturbed coast live oak woodland and forest, California sagebrush scrub, and disturbed coyote brush scrub on the project site.

Cooper's Hawk

Cooper's hawk is a CDFW WL species. Cooper's hawk breeds throughout the United States and into Canada and Mexico (Cornell University 2019). In California, Cooper's hawk nests in live oak, riparian, and other forest habitats from sea level to 9,000 feet. The Cooper's hawk is tolerant of human disturbance and habitat fragmentation and nests in suburban and urban settings (Murphy et al. 1988). Cooper's hawk hunt in open woodland and habitat edges, catching avian prey in the air, on the ground, and in vegetation. The Cooper's hawk hunts a variety of small birds and may also hunt small mammals, reptiles, and amphibians. Their nest is typically a platform of sticks and twigs lined with bark (Call 1978) and eggs are laid in February through June with the clutch size of 4 to 5 eggs (Brown and Amadon 1968).

Habitat loss, especially in riparian areas, is attributed to declining populations of Cooper's hawk in southern California. Other threats include direct or indirect human disturbance at nest sites, and eggshell thinning from pesticide use, although this threat is largely abated through the change in pesticide chemicals used after the 1970's (Terres 1980).

Cooper's hawk was not observed during the general biological survey conducted September 6, 2023; however, this species is known to occur on the project site (eBird 2024). Suitable nesting and foraging habitat for Cooper's hawk occurs within coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, and disturbed coast live oak woodland and forest on the project site. As such, the potential for this species to occur on the project site is high.

Oak Titmouse

Oak titmouse is a USFWS Bird of Conservation Concern (BCC). It is closely associated with oak species and found in a variety of habitats, including coastal oak woodlands, montane and valley foothill riparian woodlands and forests, coniferous forests, and other montane and valley woodlands (Zeiner et al. 1988-1990). Oak titmouse is an omnivore and feeds on insects, spiders, berries, acorns, and seed primarily within trees. This species nests in cavities in trees, either constructed by another species or naturally occurring (Zeiner et al. 1988-1990).

One oak titmouse was observed foraging within the coast live oak woodland and forest north of the project site during the general biological survey on September 6, 2023. The off-site oak woodlands and riparian woodlands and forests adjacent to the project site are highly suitable for this species; however, habitat on the project site has low suitability due to its disturbed nature and the non-contiguous canopy structure of the disturbed woodlands.

Orange-Throated Whiptail

The orange-throated whiptail is a CDFW WL species that inhabits chaparral, non-native grassland, coastal sage scrub, juniper woodland, and oak woodland in southwestern California and Baja California from sea level to 3,400 feet amsl. Its diet consists primarily of termites (*Reticulitermes hesperus*) and it is closely associated with perennial vegetation (Bostic 1966) including California buckwheat (McGurty 1981). Orange-throated whiptails are diurnal but spend the hottest part of the day in the shade (Pianka 1986). The orange-throated whiptail does not reproduce parthenogenetically and mates from April to July with a clutch size of around two eggs. Hibernation for adults takes place in late July to September with juveniles hibernating all the way to December (Bostic 1966).

The orange-throated whiptail is threatened by habitat loss and conversion of shrub-dominated habitats to non-native grassland. Additionally, non-native Argentine ants are an invasive species known to displace many native insects and may influence the food base the orange-throated whiptail (Jennings and Hayes 1994).

Orange-throated whiptail was not observed during the general biological survey conducted September 6, 2023; however, suitable habitat for this species occurs within California sagebrush scrub, disturbed coyote brush scrub, coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodland, and disturbed coast live oak woodland and forest on the project site. As such, orange-throated whiptail has high potential to occur on the project site.

Red-Diamond Rattlesnake

Red-diamond rattlesnake is a CDFW SSC that inhabits San Diego, Riverside, and San Bernardino counties (Zeiner et al. 1988-1990). This species is found in chaparral, coastal sage scrub, along creek banks, and in rock outcrops or piles of debris. It is often associated with dense vegetation in rocky areas (Klauber 1972). Red-diamond rattlesnake preys upon small mammals, lizards, and birds and finds prey when actively moving or by ambush (Nafis 2023). Females give live birth to litters of 5-13 young from mid-August to October in a burrow or other area that provides cover, such as a large rock (Zeiner et al. 1988-1990). The primary conservation concern for red-diamond rattlesnake is habitat loss (Nafis 2023).

Red-diamond rattlesnake was not observed during the general biological survey conducted September 6, 2023; however, suitable habitat for this species occurs within California sagebrush scrub and disturbed coyote brush scrub on the project site. As such, red-diamond rattlesnake has moderate potential to occur on the project site.

Southern California Legless Lizard

Southern California legless lizard is a CDFW SSC found in southwestern California in a variety of habitats including but not limited to coastal dunes, coastal scrubs, valley-foothill regions, and chaparral (Zeiner et al. 1988-1990). This species is insectivorous and forages near or beneath vegetation where insect eggs can also be encountered and consumed. Southern California legless lizards are fossorial and this species is known to burrow beneath rocks, loose soils, or detritus for refuge and prey access (Zeiner et al. 1988-1990). Southern California legless lizard have a low thermal tolerance and tend to prefer mesic habitats and their coexistence with other similar species

within their range may be attributed to this unique niche (Zeiner et al. 1988-1990). Threats to this species include conversion of habitat for anthropogenic uses (e.g., agriculture, mining, etc.), off-road vehicle use, and invasive plant colonization of formerly suitable habitat.

Southern California legless lizard was not observed during the general biological survey conducted September 6, 2023; however, suitable habitat for this species occurs within California sagebrush scrub and disturbed coyote brush scrub on the project site. As such, southern California legless lizard has moderate potential to occur on the project site.

Western Yellow Bat

Western yellow bat is a CDFW SSC. In California, western yellow bat is found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats below 2,000 feet (Zeiner et al. 1988-1990). This species roosts in trees, including but not limited to cottonwoods and palm trees. (Zeiner et al. 1988-1990). Western yellow bats are aerial insectivores that forage in forest and mesic regions and emerge at dusk (Zeiner et al. 1988-1990). Records of this species in California are considered migrants (Zeiner et al. 1988-1990).

Western yellow bats are threatened by habitat destruction and fragmentation, especially of riparian habitats and broadcast application of pesticides. Increased protection of riparian areas and planting of ornamental fan palms have had recent positive effects on western yellow bat (Ammerman et al. 2012).

Western yellow bat was not observed during the general biological survey conducted September 6, 2023; however, suitable roosting habitat for this species occurs within the Goodding's willow-red willow riparian woodland and forest mapped west of the project site and within on-site California sycamore-coast live oak riparian woodland and suitable foraging habitat is present throughout. As such, western yellow bat has moderate potential to occur on the project site.

Wrentit

Wrentit is a USFWS BCC. This species is a resident of chaparral and scrub habitats in western California preferring areas with dense stands of shrubs for adequate cover (Zeiner et al. 1988-1990). Wrentit feeds upon insects, spiders, berries, and other fruit from within the shrubs. This species constructs a cup nest within dense stands of shrubs, laying three to five eggs per clutch.

One wrentit was heard calling within the coastal sage scrub habitat south of the project site during the general biological survey on September 6, 2023. The off-site California sagebrush scrub adjacent to the project site is highly suitable for this species; however, suitable habitat for this species is not present within the project site.

4.3.3 WILDLIFE MOVEMENT AND CORRIDORS

A wildlife corridor can be defined as a physical feature that links wildlife habitat, often consisting of native vegetation that joins two or more larger areas of similar wildlife habitat (Ogden Environmental and Energy Services 1996). Corridors enable migration, colonization, and genetic diversity through interbreeding and are therefore critical for the movement of animals and the continuation of viable populations. Corridors can consist of large, linear stretches of connected habitat (such as riparian

vegetation) or as a sequence of stepping-stones across the landscape (discontinuous areas of habitat such as wetlands and ornamental vegetation), or corridors can be larger habitat areas with known or likely importance to local fauna.

Regional corridors are defined as those linking two or more large patches of habitat, and local corridors are defined as those allowing resident animals to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development (Ogden Environmental and Energy Services 1996). A viable wildlife migration corridor consists of more than an unobstructed path between habitat areas. Appropriate vegetation communities must be present to provide food and cover for both transient species and resident populations of less mobile animals. There must also be a sufficient lack of stressors and threats within and adjacent to the corridor for species to use it successfully.

Based on a review of the CDFW BIOS data, no wildlife movement corridors are mapped within the project site (CDFW 2025). The land within and around the project site is designated as Rank 1, "Limited Connectivity Opportunity", which is the lowest rank within the Terrestrial Connectivity, Areas of Conservation Emphasis (ACE) dataset (CDFW 2025). The project site is composed primarily of disturbed land and disturbed native habitat. Though native habitat immediately surrounds the southern and western borders of the project site, this area is narrow and directly abuts commercial and residential development. The project site is within a residential environment and surrounded by roads which already restrict wildlife movement in this region. Additionally, human presence on the site, as evidenced by use of on-site paths for walking and biking, likely deters wildlife from using the project site as a primary wildlife movement corridor.

4.4 JURISDICTIONAL AQUATIC RESOURCES

One USFWS NWI "Freshwater Forested/Shrub Wetland"/USGS NHD "Stream/River" occurs north of the project site (Figure 4; USFWS 2024c; USGS 2024). Based on the constraints-level aquatic resources survey, the survey area supports one earthen aquatic resource/drainage potentially jurisdictional per the Corps, RWQCB, and/or CDFW, as shown on Figure 2 and discussed below. USGS maps one additional NHD "Stream/River" across the center of project site, which was deemed absent during the constraints-level aquatic resources assessment.

The earthen aquatic resource/drainage (i.e., stormwater drainage channel) is linear in nature and flows west to east following a gradual decrease in topography in that direction. Based on initial constraints-level mapping, the feature originates as runoff from a higher topographic area north of the project site, channelizes before flowing along the northern boundary of the site, and continues away from the project site, eventually flowing south and draining into the Escondido Creek. The project site limits do not intersect this potentially jurisdictional feature.

The potentially jurisdictional feature outside the northern project boundary contains vegetation categorized as hydric by the National Wetland Plant List including, but not limited to, giant reed (*Arundo donax;* FACW) and cottonwood (*Populus fremontii;* FAC) (Corps 2020). Additionally, NRCS hydric soil unit, Visalia sandy loam, 0 to 2 percent slopes, and indicators of hydrology (e.g., drift deposits) occur within this earthen drainage (NRCS n.d.). Considering the hydrophytic vegetation, presence of hydric soils, and wetland hydrology indicators, the drainage may qualify as a wetland

water of the U.S./state per the Corps/RWQCB or associated wetland potentially jurisdictional per the CDFW; however, a formal jurisdictional delineation would be required to make this determination, if the project were to propose modifications or fills within the feature.

RBC anticipates that a formal aquatic resources delineation would find that the drainage mapped north of the project site qualifies as a non-wetland water of the state jurisdictional per the RWQCB and streambed jurisdictional per the CDFW. Considering the lack of surface connection to a traditionally navigable water, RBC anticipates that the mapped feature would not be considered waters of the U.S. jurisdictional by the Corps, pending agency guidance on the implementation of 33 CFR 328.3 (88 Federal Register [FR] 61964, September 8, 2023; Revised Definition of "Waters of the United States).

Based on the proposed site plan and impacts displayed on Figure 5, the potentially jurisdictional feature would be avoided and additional reporting (i.e., a formal jurisdictional delineation and aquatic resources delineation report) and agency coordination would not be necessary unless requested by the lead agency.

4.5 HABITAT CONSERVATION PLANS/NATURAL COMMUNITY CONSERVATION PLANNING AREAS

The site is within the City of Escondido and occurs within the MHCP planning area; however, the City of Escondido is not a participant in the plan and does not have an MHCP implementing agreement. The City prepared its *Draft Escondido Subarea Plan* in 2001, but the plan has not yet been adopted and the City does not yet have an MHCP implementing agreement with the USFWS or the CDFW. Therefore, no habitat conservation plan or natural community conservation plan requirements are applicable to the site.

5 IMPACTS

Direct impacts are caused by the project and occur at the same time and place as the project. Any alteration, disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Direct impacts would include direct losses to native habitats, potential jurisdictional waters, wetlands, and special-status species; and diverting natural surface water flows. Direct impacts on wildlife could include injury, death, and/or harassment of listed and/or special-status species. Direct impacts could also include the destruction of habitats necessary for species breeding, feeding, or sheltering. Direct impacts on plants can include crushing of adult plants, bulbs, or seeds.

Indirect impacts can result from project-related activities where biological resources are affected in a manner that is not direct. Indirect impacts may occur later in time or at a place that is farther removed in distance from the project than direct impacts, but indirect impacts are still reasonably foreseeable and attributable to project-related activities. Examples include habitat fragmentation; elevated noise, dust, and lighting levels; changes in hydrology, runoff, and sedimentation; decreased water quality; soil compaction; increased human activity; and the introduction of invasive wildlife (domestic cats and dogs) and plants (weeds). As noted in Section 2, the survey

area included a 100-foot buffer to identify nearby biological resources and to aid in assessment of potential indirect impacts on protected resources if present.

Cumulative impacts are a result of the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of related projects in the area, could be considered potentially significant. 'Related projects' refers to past, present, and reasonably foreseeable probable future projects, which would have similar impacts to the proposed project.

CEQA thresholds of significance have been used to determine whether project implementation would result in a significant direct, indirect, and/or cumulative impact. These thresholds are from Appendix G of the state CEQA Guidelines (CCR Title 14, Division 6, Chapter 3, Sections 15000–15387). Under CEQA, a significant biological resources impact would occur if the project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance;
- Conflict with the provisions of an adopted HCP; Natural Community Conservation Plan; or other approved local, regional, or state HCP.

CEQA Threshold 1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

5.1 SPECIAL-STATUS PLANTS AND WILDLIFE IMPACTS

5.1.1 SPECIAL-STATUS PLANT SPECIES

No federally or state-listed as endangered or threatened plant species were documented on the project site, and none have moderate to high potential to occur based on a lack of suitable habitat. As such, no significant impacts on federally or state-listed endangered or threatened plant species are anticipated with project implementation.

Four special-status plant species have a moderate potential to occur on the project site, including California adolphia, decumbent goldenbush, delicate clarkia, and summer holly; however, these species were deemed not present during focused rare plants surveys conducted in 2025. As such, no significant impacts on non-listed special-status plant species are anticipated with project implementation.

5.1.2 THREATENED AND ENDANGERED WILDLIFE SPECIES

Coastal California Gnatcatcher

The project site occurs within USFWS critical habitat for coastal California gnatcatcher and this species has been recorded within the vicinity of the project site. Isolated patches of disturbed coyote brush scrub are present on the project site and have a very low potential to support coastal California gnatcatcher; however, the California sagebrush scrub habitat immediately adjacent to the project site has a moderate-to-high potential support coastal California gnatcatcher. This species was not observed during 2024 protocol presence/absence surveys and is presumed to be absent from the survey area.

Although coastal California gnatcatcher is unlikely to occur on the project site, there is potential for this species to occur in suitable habitat adjacent to the site. Should this species be present in adjacent habitat in the future during project implementation, potentially significant impacts on this species could occur. Prior to the start of project activities, pre-construction or protocol surveys shall be conducted to confirm continued absence of coastal California gnatcatcher (BIO-2A). Should coastal California gnatcatcher be observed within the project site, impacts on occupied on-site habitat would be potentially significant. The project proponent would be required to consult with the USFWS to obtain permits and/or clearances for the proposed impacts and comply with any permit conditions and requirements, including mitigation requirements (BIO-2B).

If pre-construction or protocol surveys are positive for coastal California gnatcatcher within habitat adjacent to the site, indirect impacts on nesting California gnatcatcher could occur with project implementation through harassment in the form of noise disturbance. Such impacts are potentially significant if construction were to occur during the nesting season; however, with the implementation of noise monitoring and/or noise attenuation measures as outlined in Section 6.2, impacts on coastal California gnatcatcher would be less than significant

Crotch's Bumble Bee

Crotch's bumble bee was not documented during focused surveys or general biological surveys. The project site has very low potential to support nesting for this species due to lack of suitable burrows and soil compaction, and minimal nectar sources suitable for foraging are found on site. As such, significant impacts on Crotch's bumble bee would not occur with project implementation.

Least Bell's Vireo

Least Bell's vireo has been documented within one mile of the project site; however, suitable nesting habitat with the dense understory preferred by this species is not present on the project site. As such, direct impacts on least Bell's vireo would not occur with project implementation.

Suitable nesting habitat occurs approximately 70 feet west of the project site within Goodding's willow-red willow riparian woodland and forest (Figure 2). Indirect impacts on nesting least Bell's vireo, if present, could occur with project implementation through harassment in the form of noise disturbance. Such impacts are potentially significant; however, with the implementation of pre-construction surveys, sound monitoring, and/or noise attenuation measures as outlined in Section 6.3, impacts on least Bell's vireo would be less than significant.

5.1.3 OTHER SPECIAL-STATUS WILDLIFE SPECIES

Three non-listed special-status species, coastal whiptail, oak titmouse, and wrentit, were recorded within the survey area. Seven additional species have a high, moderate-to-high, moderate, or low-to-moderate potential to occur on the project site including: orange-throated whiptail, Cooper's hawk, coast horned lizard, red-diamond rattlesnake, southern California legless lizard, big free-tailed bat, and western yellow bat. (Table 4). For the purposes of impact analyses, these non-listed special-status species are divided into avian species, reptile species, and bat species.

Non-Listed Special-Status Avian Species

Cooper's hawk has high potential to occur on the project site considering the presence of highly suitable foraging and moderately suitable nesting habitat in coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodland and forests on and adjacent to the project site. The proposed project will not result in the permanent destruction of on-site woodlands; therefore, Cooper's hawk foraging habitat will not be impacted with project implementation. Oak titmouse and wrentit were observed within the survey area during biological surveys; however, the project site has low suitability to support these species and the proposed project will not result in the permanent destruction of suitable habitat for oak titmouse and wrentit. Additionally, significant direct impacts on adult Cooper's hawk, oak titmouse, and wrentit are unlikely, as adult avian species will likely flush from the project site at the onset of construction activities, if present.

Project construction activities (i.e., vegetation trimming) could result in direct impacts on Cooper's hawk in the form of harassment, injury, death, destruction and/or damage if active nests are present within the project site. In addition, indirect impacts on Cooper's hawk, oak titmouse, and/or wrentit may occur in the form of elevated construction noise levels. Excessive noise levels generated during construction activities could elevate stress levels of nesting birds and impair normal vocal communication between the mated pair and their young. Interference in parent/young communication could lead to reduced parental care, increased risk of nest abandonment, and decreased perception of alarm calls that signal the presence of predators. Impacts on nesting Cooper's hawk, oak titmouse, and/or wrentit, if present, are potentially significant.

Significant impacts would be avoided or minimized through implementation of project mitigation measures outlined in Section 6.6. Vegetation trimming and other construction activities would occur outside of the typical avian breeding season (typically February through August) to the greatest extent feasible (BIO-6A). In addition, pre-construction surveys for nesting birds would be conducted prior to construction within the project site and adjacent habitat (BIO-6A). If active nests are documented, non-disturbance buffers would be established and maintained around each nest

until fledglings are no longer dependent on the nest and disperse from the area or a biologist verifies through non-invasive methods that the nest is no longer active (BIO-6B). With successful implementation of the above mitigation measures, impacts on Cooper's hawk, oak titmouse, and wrentit would be less than significant.

Non-Listed Special-Status Reptile Species

Coastal whiptail was documented within the survey area and orange-throated whiptail has high potential to occur based on the presence of suitable scrub and woodland habitats. Three additional species have a moderate potential to occur based on the presence of suitable habitat: coast horned lizard, red-diamond rattlesnake, and southern California legless lizard

Direct impacts on coastal whiptail, orange-throated whiptail, coast horned lizard, red-diamond rattlesnake, and southern California legless lizard (collectively addressed as non-listed special-status reptiles herein), if present, could occur during project implementation through harassment, injury, and/or death. These reptiles use camouflage as their primary defense, seek refuge in burrows or beneath leaf litter, and may not flush when startled, making them more likely to be crushed by construction vehicles than other species. Potential impacts on these species are significant; however, impacts will be avoided and/or minimized through the implementation of measures outlined in Section 6.4, including worker environmental awareness training; monitoring and pre-construction sweeps; and relocation, if necessary (BIO-4B). With adherence to the mitigation measures described in Section 6.4, impacts on non-listed special-status reptiles would be reduced to less than significant.

Non-listed Special-Status Bat Species

Big free-tailed bat has a low-to-moderate potential to occur on the project site based on the presence of coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodland and forest. Western yellow bat has a moderate potential to occur on the project site based on the Goodding's willow-red willow riparian woodland and forest west of the project site and on-site California sycamore-coast live oak riparian woodlands. Big free-tailed bat prefers to roost in rocky crevices but may occasionally roost in trees whereas western yellow bat is an obligate tree rooster. Woodland and forest vegetation communities on and near the project site are not anticipated to be permanently impacted; as such, roosting sites will not be removed. However, construction noise or vibrations and other human activity may lead to roost abandonment. As such, construction should be conducted outside of the typical maternity roosting season, to the extent feasible (BIO-5A). If construction will occur during the typical maternity roosting season, a pre-construction bat survey (BIO-5B) is recommended to determine presence or absence of roosting colonies on or adjacent to the project site. If a maternal roost is present on site during project construction, potentially significant impacts could occur through increased noise and vibrations; however, such indirect impacts would be reduced to less than significant with the implementation of a Bat Mitigation and Avoidance Plan (BIO-5C). With the implementation of mitigation measures outlined in Section 6.5, impacts on non-listed special-status bat species would be less than significant.

CEQA Threshold 2: Have a substantial adverse effect on any riparian habitat or other sensitive

natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS?

5.2 NATIVE VEGETATION IMPACTS

The project site supports 1.65 acres of disturbed native habitat, approximately 0.10 acre of undisturbed native habitat, and 2.63 acres of disturbed land. Woodland vegetation communities on the project site (i.e., coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodland and forests) are not anticipated to incur permanent impacts. Approximately 0.28 acre of disturbed coyote bush scrub will be permanently impacted with project implementation; however, this vegetation community is not considered sensitive by CDFW. Note that for habitats identified as riparian habitat; additional protections apply as identified in Section 5.3 and Section 6, below.

The project is not anticipated to result in permanent impacts on sensitive vegetation communities and impacts on native scrub habitat are minimal, therefore, impacts on native vegetation would be less than significant.

Table 5. Summary of Vegetation Communities/Land Use Impacts

Vegetation[1]	Vegetation (Holland)[2]	Global/State Rank[3]	Impacts (acres)
California Sagebrush (Purple Sage) Scrub (*Artemisia californica* – [*Salvia leucophylla*] Shrubland Alliance)	Diegan Coastal Sage Scrub	G5/S5	0.00
Coast Live Oak Woodland and Forest (*Quercus agrifolia* Forest & Woodland Alliance)	Coast Live Oak Woodland	G5/S4	0.10
Developed Land (Developed/Disturbed)	Developed Land	No Rank	0.00
Disturbed California Sycamore-Coast Live Oak Riparian Woodland (*Platanus racemosa - Quercus agrifolia* Woodland Alliance)	Disturbed Southern Sycamore-Alder Riparian Woodland	S3/G3	0.51
Disturbed Coast Live Oak Woodland and Forest (*Quercus agrifolia* Forest & Woodland Alliance)	Disturbed Coast Live Oak Woodland	G5/S4	0.86
Disturbed Coyote Brush Scrub (*Baccharis pilularis* Shrubland Alliance)	Disturbed Northern Coyote Brush Scrub	S5/G5	0.28
Disturbed Land (Developed/Disturbed)	Disturbed Land	No Rank	2.63
Goodding's Willow-Red Willow Riparian Woodland and Forest (*Salix gooddingii – Salix laevigata* Forest & Woodland Alliance)	Southern Cottonwood-Willow Riparian Forest	G4/S3	0.00

Vegetation[1]	Vegetation (Holland)[2]	Global/State Rank[3]	Impacts (acres)
		Total[4]	4.38

[1] *Vegetation communities from The Manual of California Vegetation (Sawyer et al. 2009)*
[2] *Vegetation communities recognized by Holland (1986)*
[3] *Alliances with ranks of S1-S3 are considered Sensitive Natural Communities jurisdictional under CEQA (CDFW 2024b)*
[4] *Acreages summed using raw numbers provided during GIS analysis (available upon request) and thus the sum of the total rounded numbers may not directly add up in this table.*

CEQA Threshold 3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

5.3 POTENTIAL JURISDICTIONAL AQUATIC RESOURCES IMPACTS

One potentially jurisdictional aquatic resource is present north of the project impact footprint. This feature will be avoided during construction by flagging and/or fencing the project boundaries to clearly mark the limits of impacts (BIO-7). In addition, best management practices (BMPs), as outlined in BIO-7, will be implemented to avoid potential impacts on aquatic features adjacent to the project site (Figure 5).

If it is not feasible to avoid this feature, a formal, project-specific aquatic resources delineation and reporting per Corps, RWQCB, and CDFW standards and guidelines and further coordination with the Corps, RWQCB, and CDFW would be required. If the on-site feature is determined to be jurisdictional and impacts are unavoidable, permitting through the Corps, RWQCB, and CDFW would be required. The project applicant would be responsible for acquiring the necessary authorizations required by the Corps, RWQCB, and CDFW and associated compensatory mitigation requirements, if applicable.

CEQA Threshold 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

5.4 NESTING BIRD IMPACTS

The proposed project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season. Coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, disturbed coast live oak woodlands, California sagebrush scrub, and disturbed coyote bush scrub vegetation communities and disturbed land on the project site have the potential to support avian nests and impacts on nesting birds are prohibited by the MBTA and/or CFGC §3503. However, with the adherence to measures proposed in Section 6.6, impacts on nesting birds resulting from the project would be less than significant.

5.5 WILDLIFE MOVEMENT AND CORRIDOR IMPACTS

Based on desktop review and the field assessment of current site conditions, the project site does not function as part of a regional or local wildlife corridor. Though immediately surrounded by

relatively narrow strips of native habitat, the project site and adjacent habitat is contained within a residential community. The project site is isolated from large blocks of natural habitat and is relatively disturbed by surrounding anthropogenic land uses. Cumulatively, the project site and other undeveloped parcels in the project vicinity are unlikely to be used by wildlife species as refuge between larger areas of naturally occurring habitat. Additionally, CDFW categorizes the project site as Rank 1, "Limited Connectivity Opportunity", which is the lowest rank within the Terrestrial Connectivity, ACE dataset (CDFW 2025). Thus, the project site does not likely serve as a regional or local wildlife corridor and the project would not result in significant impacts on wildlife movement and corridors.

CEQA Threshold 5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance?

5.6 LOCAL POLICIES AND ORDINANCES IMPACTS

The City's *Draft Escondido Subarea Plan* (2001) was not adopted and the City does not have an MHCP implementing agreement with the USFWS or the CDFW. As such, the project site is not subject to local policies or ordinances protecting biological resources; therefore, the project would not conflict with such policies or ordinances.

CEQA Threshold 6: Conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?

5.7 HABITAT CONSERVATION PLAN; NATURAL COMMUNITY CONSERVATION PLAN; OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN IMPACTS

The City of Escondido is not a participant in any local HCP or NCCPs; therefore, the project would not conflict with any HCPs or NCCP requirements.

5.8 CUMULATIVE IMPACTS ON BIOLOGICAL RESOURCES

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of related projects in the area, would be considered potentially significant. 'Related projects' refers to past, present, and reasonably foreseeable probable future projects, which would have similar impacts to the proposed project.

The project site occurs within a residential area and already functions as a recreational space for the surrounding community, specifically as an unofficial bike park. The proposed project serves to enhance the existing bike paths (currently categorized as disturbed land; Figure 2) and will have little impact on the surrounding native habitat. The project site provides limited, potentially suitable habitat for five non-listed special-status plant species, two listed avian species, and nine additional non-listed special-status wildlife species. As mentioned in Section 2.1, the project site has experienced anthropogenic disturbance in the form of grading and dirt path/road construction since at least 1938 (NetrOnline 2024). Additionally, the greater area encompassing the project site has already been developed. Development of the limited native habitat directly surrounding the

project site would be fully mitigated as outlined in Section 6. Additionally, the project site and surrounding area is not anticipated to be critical for the survival of any potentially occurring special-status species due to the extent of development and anthropogenic land use within the project vicinity.

Therefore, development of the 4.57-acre project site would not result in significant cumulative impacts on sensitive biological resources or special-status species due to the developed nature of the project vicinity, the project site's current use as a recreational biking space, and the limited amount suitable special-status species habitat within and directly abutting the project site. As a result, cumulative impacts on biological resources would be less than significant.

6 AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

The following discussion provides avoidance, minimization, and mitigation measures; adherence with these measures is necessary to avoid significant impacts on biological resources and comply with state and federal statutes.

6.1 BEST MANAGEMENT PRACTICES

To avoid significant impacts on special-status resources and inadvertent disturbance to areas outside the limits of the proposed project activities, the following monitoring requirements and BMPs shall be implemented as mitigation measures:

BIO-1:

1) To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbance activities, and all construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction.
2) Construction activities shall occur during daytime hours.
3) If trash and debris need to be stored on site overnight, fully covered trash receptacles that are animal-proof and weather-proof shall be used by the construction personnel to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day but must be removed each night.
4) At the end of each workday during construction, the applicant, or its contractors, shall cover all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45 degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) constructed of earth fill or wooden planks. The project biologist shall thoroughly inspect holes and trenches for trapped animals during biological monitoring.
5) The applicant, or its contractors, shall screen, cover, or elevate at least one (1) foot above ground, all construction pipe, culverts, or similar structures with a diameter of three (3) inches or greater that are stored on site overnight. These pipes, culverts, and similar structures shall be inspected by the project biologist for wildlife before such material is moved, buried, or capped.
6) All artificial light sources utilized during night work or permanently installed as part of the project shall be directed downward at the impact area, away from adjacent habitat. Light sources shall be anti-glare and shielded.
7) If landscaping is required, non-native plants shall be avoided; a palette of native, local species will be used for on-site revegetation, if necessary.

8) All construction equipment shall be inspected for non-native seeds to avoid the spread of noxious invasives within and around the project site.

6.2 COASTAL CALIFORNIA GNATCATCHER

The project occurs within USFWS critical habitat for coastal California gnatcatcher. Protocol 2024 presence/absence surveys for coastal California gnatcatcher were negative; however, the California sagebrush scrub habitat immediately adjacent to the project site has a moderate-to-high potential to support coastal California gnatcatcher in the future. To reduce impacts on this species to less than significant, the following avoidance and minimization measures are required:

BIO-2A: If construction activities are initiated on or before June 25, 2026 (i.e., less than two years since protocol surveys), a single pre-construction survey shall be conducted by a 10(a)(1)(A) permitted biologist within the project site and a 500-foot buffer to confirm that coastal California gnatcatcher is absent. The survey shall be conducted no more seven (7) days prior to the start of project activities.

If construction activities are initiated after June 25, 2026 (i.e., more than two years since completion of protocol surveys), a protocol survey in accordance *Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Protocol* (USFWS 1997) shall be conducted on the project site plus a 500-foot buffer.

If surveys are negative, no further actions are required. If surveys are positive, measures BIO-2B-D shall apply.

BIO-2B: If the pre-construction or protocol survey is positive for coastal California gnatcatcher on the project site, the project proponent shall consult with the USFWS to obtain permits and/or clearances for the proposed impacts on habitat occupied by coastal California gnatcatcher. The project proponent shall comply with all permit requirements, including compensatory mitigation through on-site mitigation, off-site mitigation, mitigation bank credit purchase, or a combination of these options, to offset permanent and temporary impacts on coastal California gnatcatcher occupied habitat.

BIO-2C: If the pre-construction or protocol survey is positive for coastal California gnatcatcher only within habitat adjacent to the site AND project activities shall be conducted outside the nesting season (September 1 through February 14), no further actions are required since indirect impacts, e.g., noise, on nesting gnatcatcher are not anticipated.

BIO-2D: If the pre-construction or protocol survey is positive for coastal California gnatcatcher within 500 feet of the project site, but coastal California gnatcatcher was not observed on the project site, AND any project activities shall be conducted within the nesting season (September 1 through February 14), the following measures shall be followed:

1) A qualified biological monitor shall be retained to oversee the implementation of coastal California gnatcatcher avoidance and minimization measures outlined herein. The biological monitor will also present an environmental awareness training program to all project personnel prior to their work on site. The training program shall inform project personnel about the life history of coastal California gnatcatcher and all avoidance and minimization measures. In addition, the biological monitor shall

prepare written documentation of all monitoring activities, which shall be submitted to USFWS at the completion of construction activities.

2) Construction noise levels shall not exceed 60 A-weighted decibels (dB[A]) hourly, or an hourly average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A), measured at the edge of occupied habitat. The following measures shall be implemented to ensure compliance with this noise limit:

    a. A qualified acoustician shall assess the anticipated construction noise levels and shall coordinate with the qualified biologist to identify noise attenuation measures should activities be anticipated to exceed 60 dB(A) hourly average, or an average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A).

    b. If deemed necessary, noise attenuation measures (e.g., berms, walls) shall be implemented prior to the start of construction activities.

    c. Concurrent with the commencement of construction activities, noise monitoring shall be conducted at the edge of occupied coastal California gnatcatcher habitat to ensure that noise levels do not exceed 60 dB(A) hourly average, or an average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A). Noise monitoring shall be conducted at least twice weekly on varying days, or more frequently depending on the construction activity.

    d. If the noise attenuation techniques are determined to be inadequate by the qualified acoustician or biologist, then construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of nesting season (August 31).

    e. If deemed necessary for noise attenuation, the construction contractor shall require functional mufflers on all construction equipment (stationery or mobile) to reduce construction equipment noise. Stationary equipment shall be situated so that noise generated from the equipment is not directed towards any occupied coastal California gnatcatcher habitat.

    f. The construction contractor shall place staging areas as far as feasible from any suitable coastal California gnatcatcher habitat.

6.3 LEAST BELL'S VIREO

Due to the site's location adjacent to suitable habitat for least Bell's vireo, construction noise that exceeds the maximum levels allowed shall be avoided during the species' breeding seasons for the least Bell's vireo (March 15 through August 15). If construction is proposed during the breeding season, USFWS protocol surveys shall be required in order to determine species presence or absence (i.e., eight surveys conducted at least ten days apart April-July). If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed, and noise attenuation and monitoring will be required.

Specifically, the following mitigation shall be implemented:

BIO-3: No construction activities shall result in noise levels exceeding 60 dB(A) hourly average from March 15 through August 15 within occupied least Bell's vireo habitat (as determined by a qualified avian biologist based on USFWS protocol surveys). An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with ESA-listed animal species) at least two weeks prior to commencement of construction activities. Prior to the commencement of construction activities during the least Bell's vireo breeding season (March 15 – August 15), areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist.

OR

At least two weeks prior to the commencement of construction activities that occur between March 15 – August 15, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that construction noise levels will not exceed 60 dB(A) hourly average at the edge of potentially occupied least Bell's vireo habitat (as determined by a USFWS-permitted biologist based on USFWS protocol surveys). Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of suitable least Bell's vireo habitat to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques are determined to be inadequate by the qualified acoustician or biologist, then construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of breeding season (August 16). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of suitable habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the wildlife agencies, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

6.4 NON-LISTED SPECIAL-STATUS REPTILES

Coastal whiptail was observed within the survey area, orange-throated whiptail has high potential to occur, and coast horned lizard, red-diamond rattlesnake, and southern California legless lizard have moderate potential to occur on the project site and may be directly impacted with project implementation. As such, adherence with the following resource protection and regulatory compliance measures for non-listed special-status reptiles is recommended:

BIO-4A: All construction personnel working on the project shall attend a worker environmental awareness training that covers basic non-listed special-status reptile identification and required avoidance and minimization measures.

BIO-4B: Biological monitors with knowledge of reptile identification and behavior shall be retained to oversee and assist in the implementation of project avoidance and minimization measures and would have the authority to halt work if non-listed special-status reptile is

discovered on site or if the project is not in compliance with avoidance and minimization measures.

BIO-4C: Non-listed special-status reptiles found within the project footprint during construction shall be relocated by an authorized biological monitor. Relocated species shall be placed in the shade of a large shrub within suitable habitat adjacent to the project site.

6.5 NON-LISTED SPECIAL-STATUS BATS

Western yellow bat has moderate potential to occur and big free-tailed bat has low-to-moderate potential to occur on the project site and may be directly impacted with project implementation. As such, adherence with the following resource protection and regulatory compliance measures for non-listed special-status bats is recommended:

BIO-5A: To the extent feasible, the City shall limit construction activities associated with the project to outside of the typical bat maternity roosting season, which extends from approximately March to September.

BIO-5B: If construction is to occur during the roosting season (March-September)l, a pre-construction special-status bat survey shall be completed by a qualified biologist within all suitable daytime, nighttime, and maternal roosting habitat plus a 300-foot buffer within 60 days prior to ground disturbance or vegetation removal.

BIO-5C: If a maternal roost is located, a Bat Mitigation and Avoidance Plan shall be developed for CDFW's approval. The Bat Mitigation and Avoidance Plan shall require a 300-foot buffer be established around the roost location. No construction shall occur within this 300-foot buffer until the roosting season concludes and a qualified biologist determines roost inactivity.

6.6 NESTING BIRDS

As noted above, significant impacts on nesting birds may occur with project implementation. As such, adherence with the following resource protection and regulatory compliance measure for nesting birds is recommended:

BIO-6A: To ensure compliance with CFGC sections 3503, 3503.5, and 3513 and to avoid potential significant impacts on nesting birds, vegetation clearing, and ground disturbing activities shall be conducted outside of the bird nesting season, which is generally February through July, to the greatest extent feasible. In addition, regardless of the time of year, a qualified biologist shall conduct a nesting bird survey within the project site and adjacent habitat within three (3) days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading.

BIO-6B: If active nests are identified, the biologist shall establish species-specific buffers around the nests and the buffer areas shall be avoided until the nests are no longer occupied, and the juvenile birds can survive independently from the nests. A letter report or mitigation plan in conformance with applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) which includes proposed measures to ensure that take of birds or eggs or disturbance of breeding activities is avoided shall be prepared and implemented. The project biologist shall verify that all protective measures are in place prior to and/or during construction. During construction activities, the qualified biologist shall continue biological monitoring at a

frequency recommended by the qualified biologist using their best professional judgement. If nesting birds are detected, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds.

6.7 AQUATIC RESOURCES

One ephemeral, earthen linear feature potentially jurisdictional to the CDFW and the RWQCB occurs north of the project site. To avoid impacts on this aquatic feature, RBC recommends the following resource protection measure:

BIO-7: Construction activities shall not extend into the aquatic feature potentially jurisdictional to the CDFW and the RWQCB along the northern boundary of the project site. Flagging and/or fencing will be installed to clearly mark the project limits/boundaries.

In addition, the following BMPs shall be implemented to reduce impacts on adjacent aquatic resources:

1) Cut vegetation must be hauled away from potentially jurisdictional features and stored, if necessary, where it cannot be washed by rainfall or runoff into the features.
2) When construction is complete, any excess construction materials or debris will be removed from the project site.
3) Temporary structures and storage of construction materials will not be located in potentially jurisdictional waters located off site.

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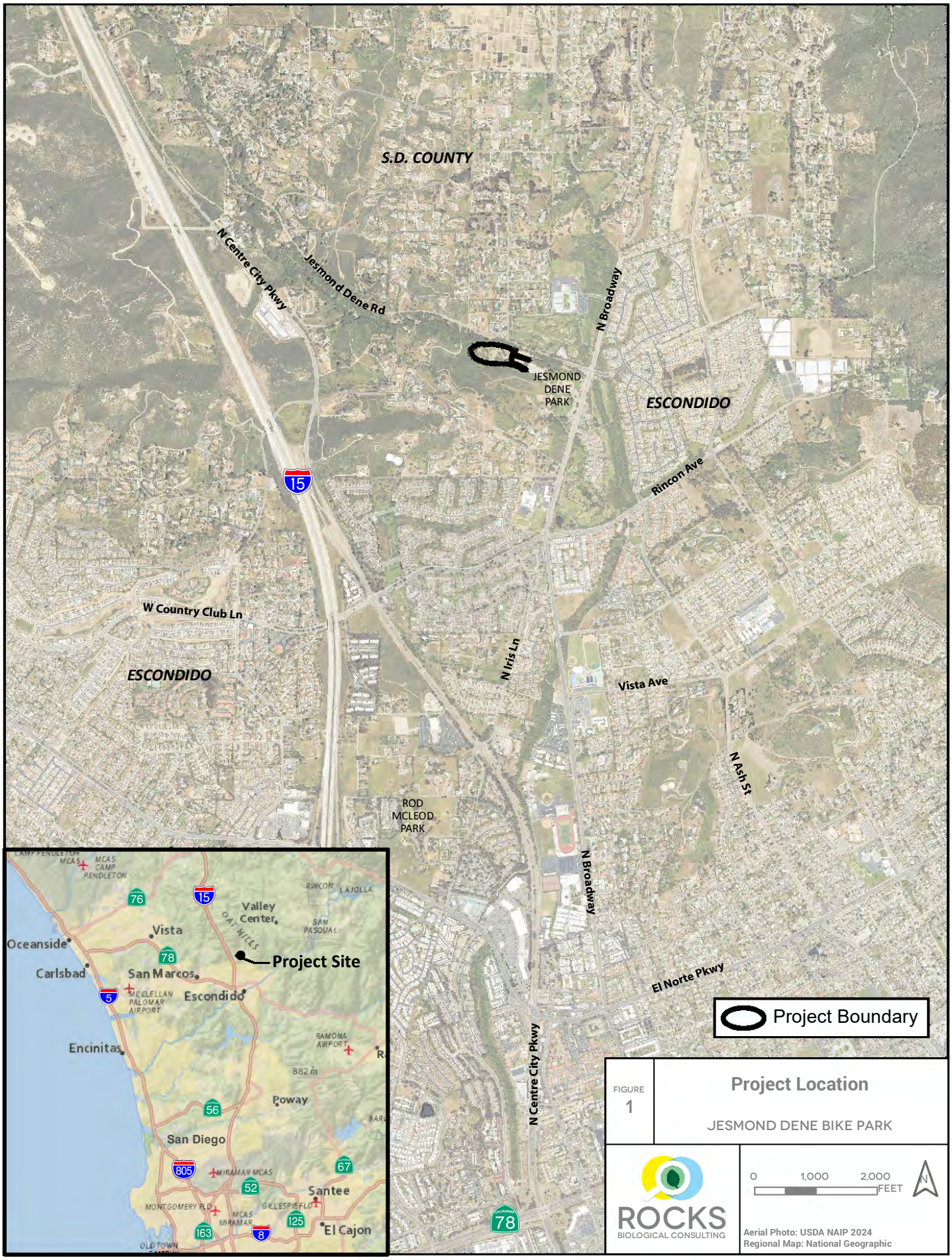


FIGURE 1

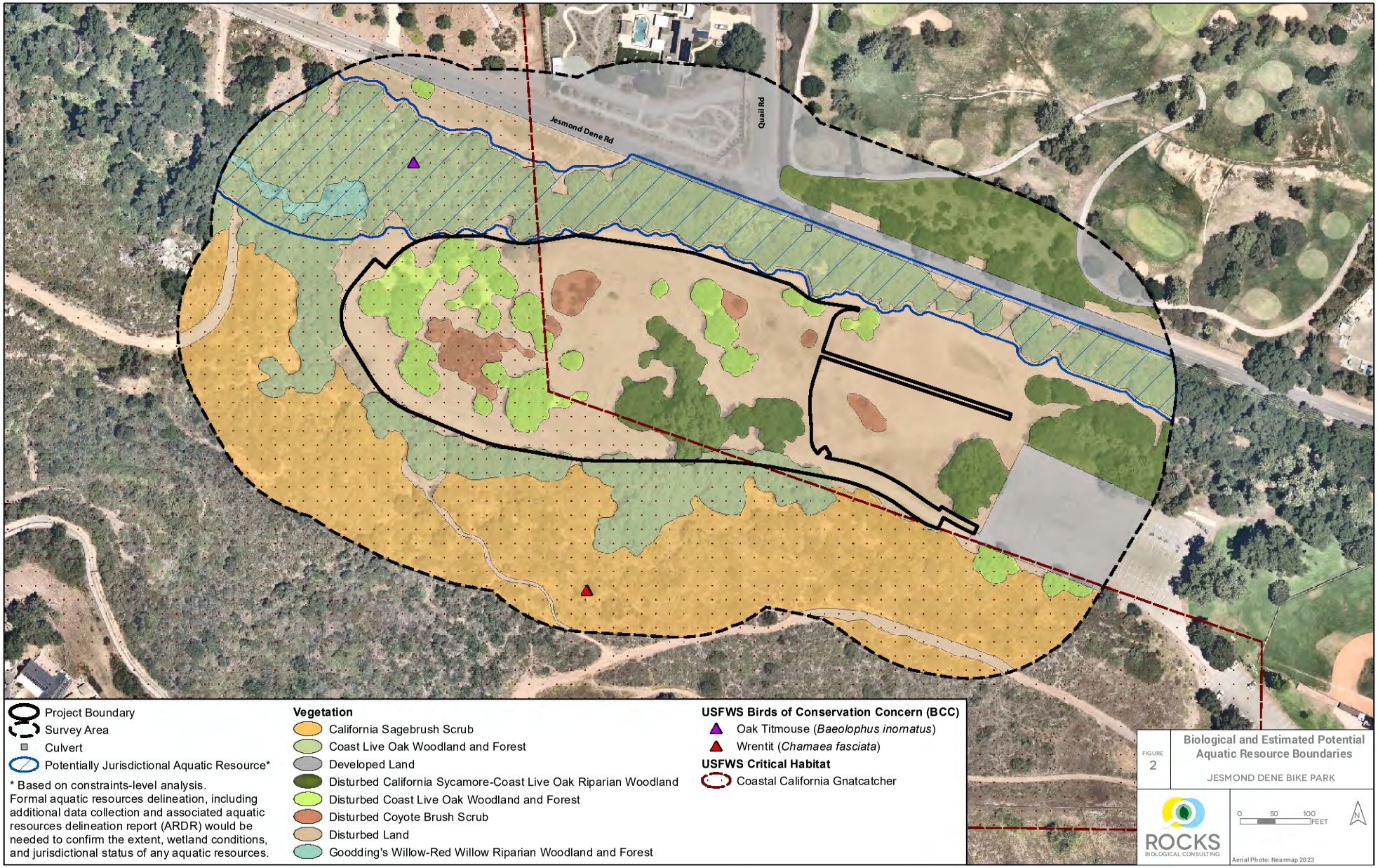
Project Location

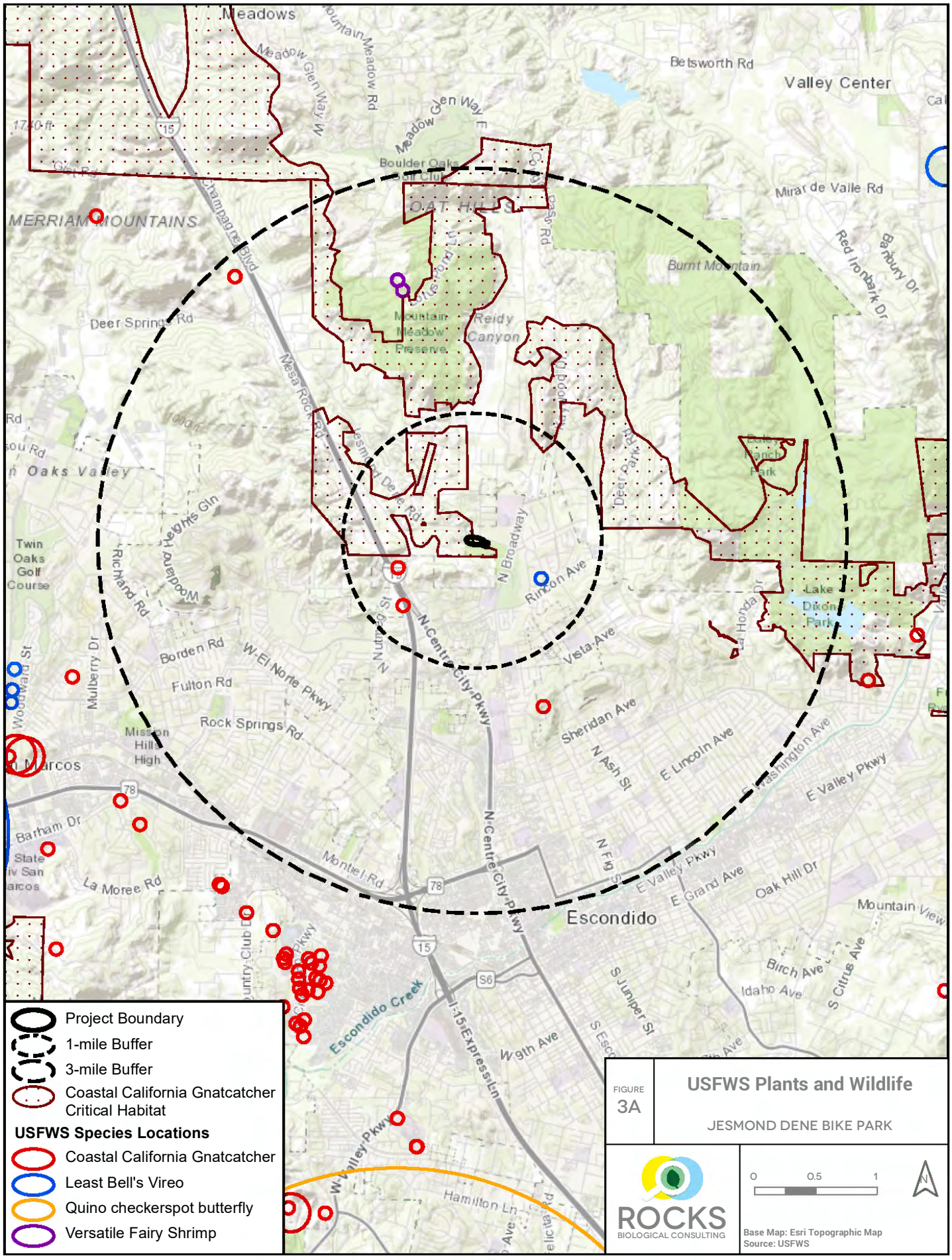
JESMOND DENE BIKE PARK

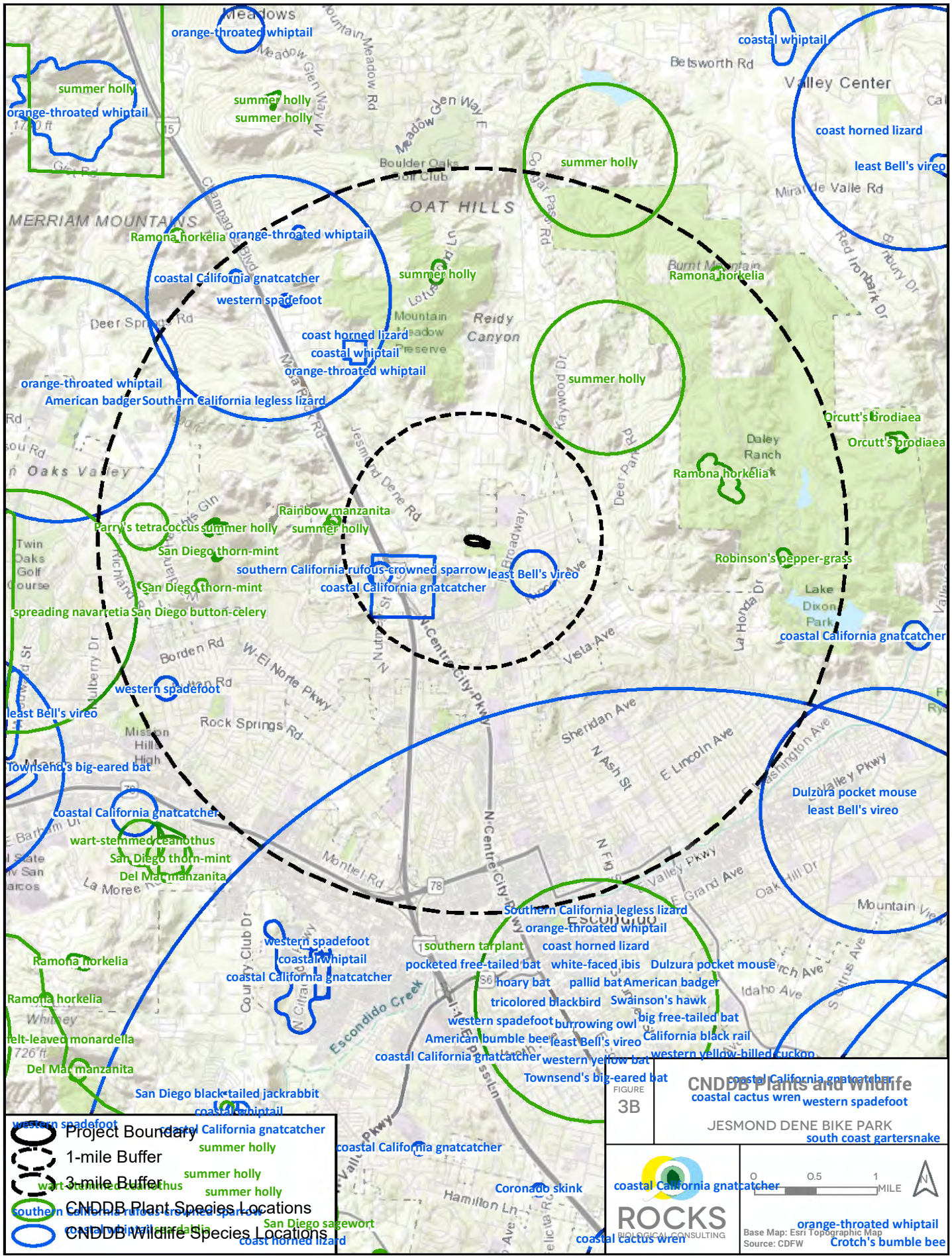
ROCKS BIOLOGICAL CONSULTING

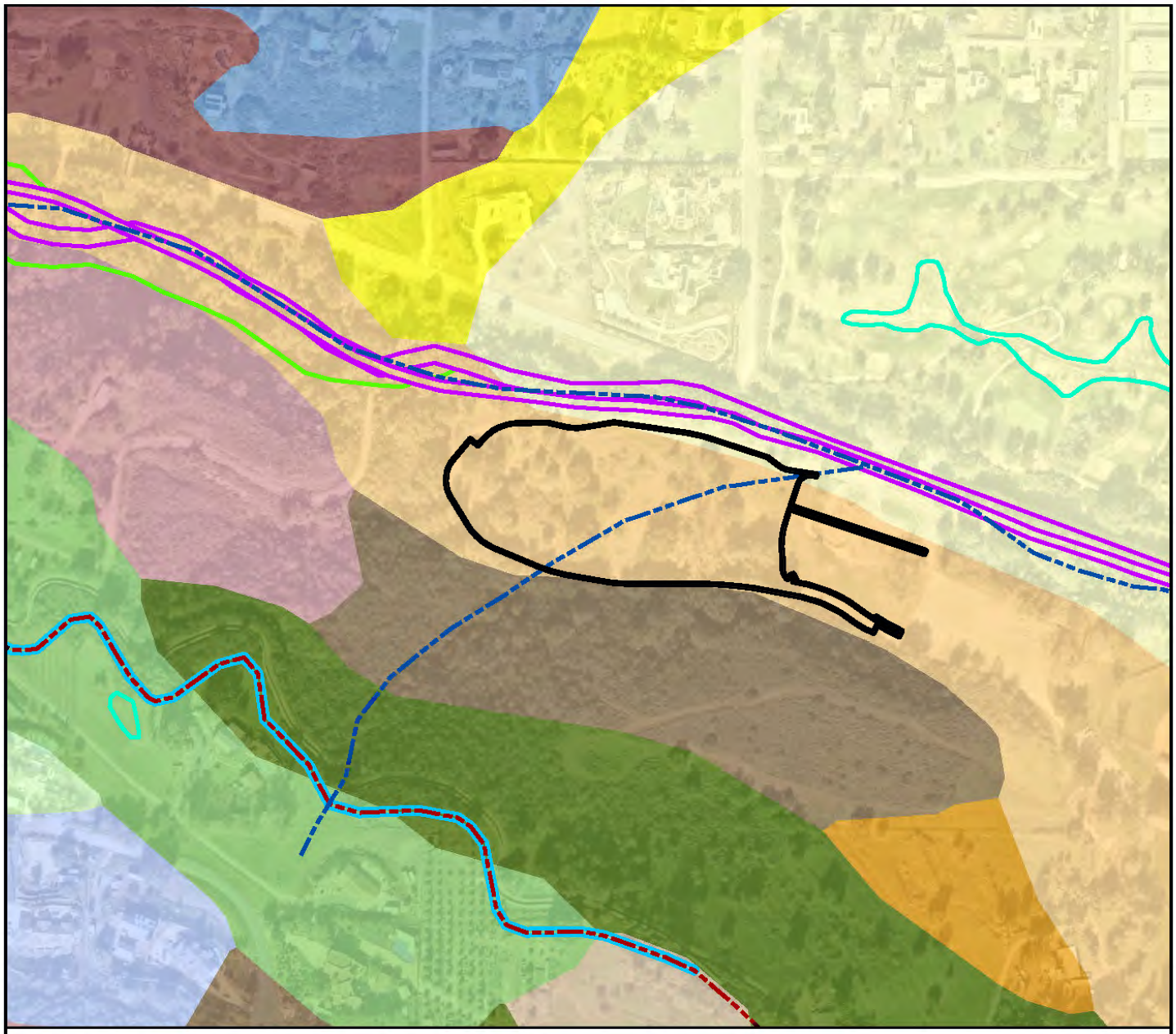
0 1,000 2,000 FEET

Aerial Photo: USDA NAIP 2024
Regional Map: National Geographic


Jesmond Dene Rd
Quail Rd
Project Boundary
Survey Area
Culvert
Potentially Jurisdictional Aquatic Resource*
* Based on constraints-level analysis.
Formal aquatic resources delineation, including additional data collection and associated aquatic resources delineation report (ARDR) would be needed to confirm the extent, wetland conditions, and jurisdictional status of any aquatic resources.
Vegetation
California Sagebrush Scrub
Coast Live Oak Woodland and Forest
Developed Land
Disturbed California Sycamore-Coast Live Oak Riparian Woodland
Disturbed Coast Live Oak Woodland and Forest
Disturbed Coyote Brush Scrub
Disturbed Land
Goodding's Willow-Red Willow Riparian Woodland and Forest
USFWS Birds of Conservation Concern (BCC)
Oak Titmouse (Baeolophus inornatus)
Wrentit (Chamaea fasciata)
USFWS Critical Habitat
Coastal California Gnatcatcher
FIGURE 2
Biological and Estimated Potential Aquatic Resource Boundaries
JESMOND DENE BIKE PARK
ROCKS BIOLOGICAL CONSULTING
0 50 100 FEET
N
Aerial Photo: Nearmap 2023


Project Boundary
1-mile Buffer
3-mile Buffer
Coastal California Gnatcatcher Critical Habitat
USFWS Species Locations
Coastal California Gnatcatcher
Least Bell's Vireo
Quino checkerspot butterfly
Versatile Fairy Shrimp
FIGURE 3A
USFWS Plants and Wildlife
JESMOND DENE BIKE PARK
ROCKS BIOLOGICAL CONSULTING
0 0.5 1
Base Map: Esri Topographic Map
Source: USFWS
Meadows
Betsworth Rd
Valley Center
Meadow Glen Way W
Meadow Glen Way E
Mountain Meadow Rd
Boulder Oaks Golf Club
OAT HILLS
MERRIAM MOUNTAINS
Champagne Blvd
Mirar de Valle Rd
Red Ironbark Dr
Barbury Dr
Burnt Mountain
Deer Springs Rd
Mountain Meadow Preserve
Reidy Canyon
Mesa Rock Rd
Jesmond Dene Rd
Deer Park Rd
Lake Dixon Park
Oaks Valley
Twin Oaks Golf Course
Woodland Heights Gln
Richland Rd
N Broadway
Rincon Ave
N Centre City Pkwy
Vista Ave
Mulberry Dr
Borden Rd
W El Norte Pkwy
Fulton Rd
Rock Springs Rd
Sheridan Ave
N Ash St
E Lincoln Ave
E Valley Pkwy
Mission Hills High
San Marcos
Barham Dr
State
La Moree Rd
Montiel Rd
Escondido
E Grand Ave
Oak Hill Dr
Mountain View
Birch Ave
Idaho Ave
S Citrus Ave
S Juniper St
Escondido Creek
I-15 Express Ln
W 9th Ave
W Valley Pkwy
Hamilton Ln
78
15
S6


orange-throated whiptail
summer holly
orange-throated whiptail
summer holly
summer holly
coastal whiptail
coast horned lizard
least Bell's vireo
summer holly
Ramona horkelia
orange-throated whiptail
coastal California gnatcatcher
western spadefoot
summer holly
Ramona horkelia
coast horned lizard
coastal whiptail
orange-throated whiptail
summer holly
orange-throated whiptail
American badger
Southern California legless lizard
Orcutt's brodiaea
Orcutt's brodiaea
Ramona horkelia
Rainbow manzanita
Parry's tetracoccus
summer holly
summer holly
San Diego thorn-mint
Robinson's pepper-grass
southern California rufous-crowned sparrow
least Bell's vireo
San Diego thorn-mint
coastal California gnatcatcher
coastal California gnatcatcher
spreading navarretia
San Diego button-celery
western spadefoot
least Bell's vireo
Townsend's big-eared bat
coastal California gnatcatcher
Dulzura pocket mouse
least Bell's vireo
wart-stemmed ceanothus
San Diego thorn-mint
Del Mar manzanita
Southern California legless lizard
orange-throated whiptail
western spadefoot
coastal whiptail
coastal California gnatcatcher
southern tarplant
coast horned lizard
pocketed free-tailed bat
white-faced ibis
Dulzura pocket mouse
hoary bat
pallid bat
American badger
tricolored blackbird
Swainson's hawk
western spadefoot
burrowing owl
big free-tailed bat
American bumble bee
least Bell's vireo
California black rail
coastal California gnatcatcher
western yellow bat
western yellow-billed cuckoo
Townsend's big-eared bat
coastal California gnatcatcher
Ramona horkelia
Ramona horkelia
felt-leaved monardella
Del Mar manzanita
coastal cactus wren
western spadefoot
San Diego black-tailed jackrabbit
coastal whiptail
western spadefoot
coastal California gnatcatcher
summer holly
coastal California gnatcatcher
summer holly
wart-stemmed ceanothus
summer holly
Coronado skink
southern California rufous-crowned sparrow
San Diego sagewort
felt-leaved monardella
coast horned lizard
coastal cactus wren
coastal California gnatcatcher
orange-throated whiptail
Crotch's bumble bee
Project Boundary
1-mile Buffer
3-mile Buffer
CNDDB Plant Species Locations
CNDDB Wildlife Species Locations
CNDDB Plants and Wildlife
FIGURE 3B
JESMOND DENE BIKE PARK
ROCKS BIOLOGICAL CONSULTING
0 0.5 1 MILE
Base Map: Esri Topographic Map
Source: CDFW



Project Boundary

Soils

- Cieneba coarse sandy loam, 15 to 30 percent slopes, eroded
- Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded
- Cieneba very rocky coarse sandy loam, 30 to 75 percent slopes
- Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded
- Fallbrook-Vista sandy loams, 15 to 30 percent slopes
- Fallbrook-Vista sandy loams, 9 to 15 percent slopes
- Ramona sandy loam, 2 to 5 percent slopes
- Ramona sandy loam, 5 to 9 percent slopes
- Visalia sandy loam, 0 to 2 percent slopes
- Visalia sandy loam, 5 to 9 percent slopes
- Vista coarse sandy loam, 5 to 9 percent slopes
- Vista coarse sandy loam, 9 to 15 percent slopes, eroded
- Vista coarse sandy loam, 15 to 30 percent slopes, eroded

National Hydrography Dataset (NHD)

- Stream/River
- Pipeline

National Wetlands Inventory (NWI)

- Riverine
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Forested/Shrub Riparian

FIGURE 4

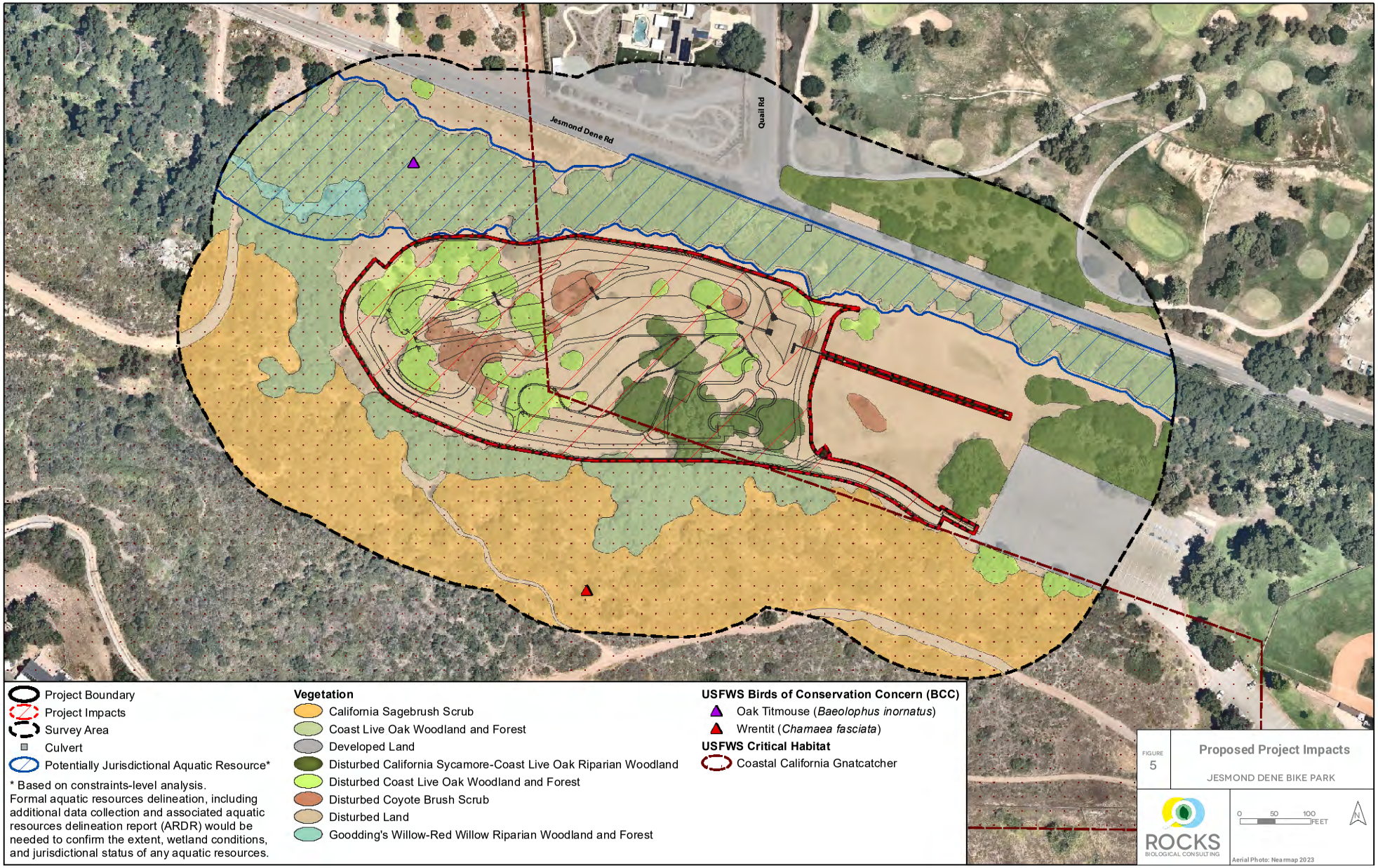
Soils, National Hydrography Dataset, and National Wetland Inventory

JESMOND DENE BIKE PARK

ROCKS BIOLOGICAL CONSULTING

0 150 300

Source: USFWS, USGS, USDA NRCS
Aerial Photo: SANDAG, Nearmap 2023


Jesmond Dene Rd
Quail Rd
Project Boundary
Project Impacts
Survey Area
Culvert
Potentially Jurisdictional Aquatic Resource*
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Vegetation
California Sagebrush Scrub
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Developed Land
Disturbed California Sycamore-Coast Live Oak Riparian Woodland
Disturbed Coast Live Oak Woodland and Forest
Disturbed Coyote Brush Scrub
Disturbed Land
Goodding's Willow-Red Willow Riparian Woodland and Forest
USFWS Birds of Conservation Concern (BCC)
Oak Titmouse (Baeolophus inornatus)
Wrentit (Chamaea fasciata)
USFWS Critical Habitat
Coastal California Gnatcatcher
FIGURE 5
Proposed Project Impacts
JESMOND DENE BIKE PARK
ROCKS BIOLOGICAL CONSULTING
0 50 100 FEET
N
Aerial Photo: Nearmap 2023

APPENDIX A

SITE PHOTOGRAPHS

Appendix A

Site Photographs

Photo 1. California sagebrush scrub within the southern portion of the survey area, facing southwest. September 6, 2023.

Photo 2. Disturbed coyote brush scrub in the central portion of the survey area, facing southeast. September 6, 2023.

Photo 3. Disturbed habitat in the foreground with coast live oak woodland and forest in the background. Photo taken in the northern portion of the survey area facing northwest. September 6, 2023.

Photo 4. Disturbed coast live oak woodland and forest in the central portion of the survey area facing south. September 6, 2023.

Photo 5. Disturbed California sycamore-coast live oak riparian woodland in the central portion of the survey area facing northeast. September 6, 2023.

Photo 6. Gooding's willow-red willow riparian woodland and forest in the eastern portion of the survey area facing northeast. September 6, 2023.

Photo 7. View of open, disturbed habitat in the northcentral portion of the survey area facing south. April 30, 2025

Photo 8. Overview of disturbed habitat, rock piles, and disturbed coast live oak woodland in the western portion of the survey area facing north. May 30, 2025

APPENDIX B

PLANT SPECIES OBSERVED

Appendix B

Plant Species Observed

Family	Scientific Name	Common Name
Adoxaceae	*Sambucus nigra*	Blue elderberry
Amaranthaceae	*Amaranthus albus**	White tumbleweed
Amaranthaceae	*Amaranthus blitoides*	Prostrate amaranth
Anacardiaceae	*Malosma laurina*	Laurel sumac
Anacardiaceae	*Schinus molle**	Peruvian pepper tree
Anacardiaceae	*Toxicodendron diversilobum*	Western poison-oak
Apiaceae	*Foeniculum vulgare**	Sweet fennel
Apiaceae	*Lomatium* sp.	*Lomatium* parsley species
Arecaceae	*Phoenix canariensis**	Canary island date palm
Arecaceae	*Washingtonia robusta**	Mexican fan palm
Asteraceae	*Acourtia microcephala*	Sacapellote
Asteraceae	*Ambrosia psilostachya*	Western ragweed
Asteraceae	*Artemisia californica*	California sagebrush
Asteraceae	*Artemisia douglasiana*	Douglas mugwort
Asteraceae	*Baccharis pilularis*	Coyote brush
Asteraceae	*Baccharis salicifolia*	Mule-fat
Asteraceae	*Carduus pycnocephalus**	Italian thistle
Asteraceae	*Centaurea melitensis**	Tocalote
Asteraceae	*Deinandra fasciculata*	Clustered tarweed
Asteraceae	*Eriophyllum confertiflorum*	Yellow yarrow
Asteraceae	*Geranium* sp.	Geranium species
Asteraceae	*Hazardia squarrosa*	Southern sawtooth goldenbush
Asteraceae	*Heterotheca grandifolia*	Telegraph weed
Asteraceae	*Lactuca serriola**	Prickly lettuce
Boraginaceae	*Amsinckia menziesii* var. *intermedia*	Rigid fiddleneck
Boraginaceae	*Eucrypta chrysanthemifolia*	Common eucrypta
Boraginaceae	*Heliotropium curassavicum*	Salt heliotrope
Boraginaceae	*Phacelia cicutaria*	Caterpillar phacelia
Boraginaceae	*Phacelia ramosissimax*	Branching phacelia
Brassicaceae	*Hirschfeldia incana**	Short-pod mustard
Brassicaceae	*Sisymbrium altissimum*	Tumble mustard
Caprifoliaceae	*Lonicera subspicata*	Southern honeysuckle
Cucurbitaceae	*Marah macrocarpa*	Wild-cucumber

Family	Scientific Name	Common Name
Cyperaceae	*Cyperus virens**	Green flatsedge
Dryopteridaceae	*Dryopteris arguta*	Coastal woodfern
Entodontaceae	*Entodon seductrix*	Round-stem silk moss
Euphorbiaceae	*Croton setiger*	Doveweed
Euphorbiaceae	*Euphorbia maculata**	Spotted spurge
Euphorbiaceae	*Ricinus communis**	Castor bean
Fabaceae	*Acmispon americanus* var. *americanus*	Spanish-clover
Fabaceae	*Robinia pseudoacacia**	Black locust
Fagaceae	*Quercus agrifolia*	Coast live oak
Geraniaceae	*Erodium cicutarium*	Storksbill
Iridaceae	*Sisyrinchium bellum*	Blue-eyed grass
Lamiaceae	*Marrubium vulgare**	White horehound
Lamiaceae	*Salvia apiana*	White sage
Lamiaceae	*Salvia mellifera*	Black sage
Moraceae	*Ficus carica**	Edible fig
Myrsiniaceae	*Diplacus puniceus*	Coast monkey flower
Myrsiniaceae	*Lysimachia arvensis**	Scarlet pimpernel
Onagraceae	*Epilobium canum*	California fuschia
Plantaginaceae	*Keckiella antirrhinoides*	Chaparral beard tongue
Plantaginaceae	*Keckiella cordifolia*	Heart leaved keckiella
Plantaginaceae	*Plantago lanceolata**	English plantain
Plantanaceae	*Platanus racemosa*	Western sycamore
Poaceae	*Arundo donax**	Giant reed
Poaceae	*Avena barbata**	Slender wild oat
Poaceae	*Avena fatua**	Wild oat
Poaceae	*Bromus diandrus**	Ripgut brome
Poaceae	*Bromus madritensis**	Compact brome
Poaceae	*Bromus rubens**	Red brome
Poaceae	*Stipa miliacea**	Smilo grass
Poaceae	*Stipa pulchra*	Purple needle grass
Polygonaceae	*Eriogonum fasciculatum* var. *fasciculatum*	Coast California buckwheat
Polygonaceae	*Rumex crispus**	Curly dock
Pteridaceae	*Pentagramma triangularis*	Gold back fern

Family	Scientific Name	Common Name
Ranunculaceae	*Clematis* sp.	Clematis species
Ranunculaceae	*Thalictrum fendleri*	Fendler's meadow rue
Rhamnaceae	*Rhamnus crocea*	Redberry buckthorn
Rosaceae	*Heteromeles arbutifolia*	Toyon
Rosaceae	*Rosa californica*	California rose
Salicaceae	*Populus fremontii*	Fremont cottonwood
Salicaceae	*Salix gooddingii*	Goodding's black willow
Salicaceae	*Salix laevigata*	Red willow
Salicaceae	*Salix lasiandra*	Shining willow
Solanaceae	*Datura wrightii*	Jimsonweed
Solanaceae	*Nicotiana glauca**	Tree tobacco
Tamaricaceae	*Tamarix ramosissima**	Saltcedar
Non-native*		

APPENDIX C

WILDLIFE SPECIES OBSERVED

Appendix C

Wildlife Species Observed

Family	Scientific Name	Common Name
Birds		
Accipitridae	*Buteo lineatus*	Red-shouldered hawk
Aegithalidae	*Psaltriparus minimus*	Bushtit
Cathartidae	*Cathartes aura*	Turkey vulture
Columbidae	*Zenaida macroura*	Mourning dove
Corvidae	*Aphelocoma californica*	California scrub jay
Corvidae	*Corvus brachyrhynchos*	American crow
Corvidae	*Corvus corax*	Common raven
Fringillidae	*Haemorhous mexicanus*	House finch
Fringillidae	*Spinus psaltria*	Lesser goldfinch
Icteridae	*Icterus cucullatus*	Hooded oriole
Odontophoridae	*Callipepla californica*	California quail
Paradoxornithidae	*Chamaea fasciata* (BCC)	Wrentit
Paridae	*Baeolophus inornatus* (BCC)	Oak titmouse
Paridae	*Poecile gambeli*	Mountain chickadee
Parulidae	*Leiothlypis celata*	Orange-crowned warbler
Passerellidae	*Melozone crissalis*	California towhee
Passerellidae	*Pipilo maculatus*	Spotted towhee
Passerellidae	*Zonotrichia leucophrys*	White-crowned sparrow
Picidae	*Dryobates nuttallii*	Nuttall's woodpecker
Picidae	*Melanerpes formicivorus*	Acorn woodpecker
Polioptilidae	*Polioptila caerulea*	Blue-gray gnatcatcher
Sturnidae	*Sturnus vulgaris**	European starling
Thraupidae	*Piranga ludoviciana*	Western tanager
Trochilidae	*Calypte anna*	Anna's hummingbird
Trochilidae	*Selasphorus sasin*	Allen’s hummingbird
Troglodytidae	*Thryomanes bewickii*	Bewick's wren
Turdidae	*Sialia mexicana*	Western bluebird
Tyrannidae	*Empidonax difficilis*	Pacific slope flycatcher
Tyrannidae	*Sayornis nigricans*	Black phoebe
Tyrannidae	*Tyrannus vociferans*	Cassin’s kingbird
Vireonidae	*Vireo huttoni*	Hutton's vireo

Family	Scientific Name	Common Name
Reptiles		
Phrynosomatidae	*Sceloporus occidentalis*	Western fence lizard
Phrynosomatidae	*Uta stansburiana*	Common side-blotched lizard
Teiidae	*Aspidoscelis tigris stejnegeri* (SSC)	San Diegan tiger whiptail
Mammals		
Sciuridae	*Otospermophilus beecheyi*	California ground squirrel
Invertebrates		
Apidae	*Apis mellifera**	European honey bee
Apidae	*Bombus vosnesenskii*	Yellow-faced bumblebee
Apidae	*Xylocopa sp.*	Carpenter bee
Bombyliidae	N/A	Bee fly
Cicadoidea	N/A	Cicada
Libellulidae	*Libellula saturata*	Flame skimmer
Nephilidae	*Trichonephila clavipes**	Golden orb weaver
Nymphalidae	*Adelpha californica*	California sister
Nymphalidae	*Junonia coenia*	Common buckeye
Nymphalidae	*Limenitis lorquini*	Lorquin's admiral
Nymphalidae	*Vanessa cardui*	Painted lady butterfly
Papilionidae	*Papilio rutulus*	Western tiger swallowtail
Pieridae	*Pieris rapae**	Cabbage white
Syrphidae	N/A	Hoverfly

BCC – USFWS Birds of Conservation Concern
SSC – CDFW Species of Special Concern
*Non-native

APPENDIX D

2025 RARE PLANT SURVEY REPORT

ROCKS
BIOLOGICAL CONSULTING

To: Mr. Mark Araujo, Kimley-Horn

From: Jim Rocks and Ian Hirschler, Rocks Biological Consulting

Date: July 2, 2025

Subject: Jesmond Dene Bike Park Project – 2025 Rare Plant Survey Report

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This memo provides a summary of the rare plant surveys conducted by Rocks Biological Consulting (RBC) for the proposed Jesmond Dene Bike Park Project (project). Focused rare plant surveys conducted April–June 2025 were negative for the project site and immediately adjacent areas.

PROJECT LOCATION & BACKGROUND

The approximately 4.38-acre project site is in the City of Escondido south of Jesmond Dene Road, west of N Broadway Road, north of Flume Road, and southeast of Edwards Access Road. The project site is surrounded by a golf course and residential development to the north, sparse residential development and open space to the west, and denser residential development on the south and east (Figure 1). The project site is located on Assessor Parcel Numbers (APNs) 18731009 and 18731011.

The project would include construction of a bike park adjacent to the Jesmond Dene Park recreational area. Specifically, the project would enhance and formalize the existing bike paths and adjacent land. The bike park would be divided into three tracks, a pump track, a skill track, and a kids track, and would also include a multi-use loop trail around the outer perimeter of the park.

METHODS

In preparation for the rare plant surveys, RBC conducted a desktop analysis of the project site by querying relevant biological resource databases and reviewing current and historic aerial photography. The review included, but was not limited to, the following:

- California Department of Fish and Wildlife (CDFW) Natural Diversity Database[1]
- U.S. Fish and Wildlife Service (USFWS) Special-Status Species and Critical Habitat Database[2]
- USFWS Information for Planning and Consultation (IPaC) database[3]

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1 CDFW. 2025. California Department of Fish and Game Natural Diversity Database. Retrieved April 7, 2025, from https://wildlife.ca.gov/Data/CNDDB.

2 USFWS. 2025. Critical Habitat for Threatened and Endangered Species. Retrieved April 7, 2025, from https://fws.maps.arcgis.com/home/webmap/viewer.html.

3 USFWS. 2025. Information for Planning and Consulting (IPaC). Retrieved April 7, 2025, from https://ipac.ecosphere.fws.gov.

- The California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California Electronic Inventory[4]
- Natural Resources Conservation Service (NRCS) soils data[5]
- Google Earth Pro Imagery[6]

Rare plant surveys were conducted within the project site and a 50-foot buffer (survey area; Figure 2) on April 30, May 30, and June 26, 2025 by RBC principal biologist Jim Rocks and senior biologist Ian Hirschler. Both surveyors have extensive experience identifying special-status plant species throughout southern California, including the target species potentially occurring at the project site. The rare plant surveys were conducted in accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Plant Populations and Natural Communities* (California Department of Fish and Wildlife 2018).

Surveys were conducted during the appropriate blooming periods for the following target species:

- California adolphia (*Adolphia californica*)
- Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*)
- Delicate clarkia (*Clarkia delicata*)
- Nuttall's scrub oak (*Quercus dumosa*)
- Summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*)

Biologists walked transects throughout the survey area, identifying all plant species encountered. Vascular plants observed within the survey area were identified to species, subspecies, or varietal level.

RESULTS & CONCLUSION

The project site is a relatively flat parcel that is bisected by dirt paths. The central portion of the site is developed as a bike park with dirt ramps and jumps. A large drainage is present along the northern project boundary of the site. The project site is largely comprised of disturbed land but also supports areas of coast live oak woodland and California sycamore-coast live oak riparian woodland. The site has undergone periodic grading since at least 1938[7] and portions of the site were observed to have been recently graded during rare plant surveys.

Based on the desktop analysis, several rare plant species occur in the general region. However, none of the species identified in the region nor any other rare plant species were observed during 2025 focused rare plant surveys. Site photos are included as Attachment A, and a full list of plant species observed is included as Appendix B.

4 CNPS, Rare Plant Program. 2025. California Native Plant Society Rare Plant Inventory. Retrieved April 7, 2025, from http://www.rareplants.cnps.org.
5 NRCS Soils. 2025. Retrieved February 19, 2025, from https://websoilsurvey.nrcs.usda.gov.
6 Google Earth Pro V 7.3.6.9796. 2025. San Diego County, California. 33°07'57.59"N, 117°09'03.55"W, Eye alt 1661 feet. Accessed April 2025.
7 NetrOnline, 2024. *Historic aerials.* NETRonline. Retrieved May 2024, from https://www.historicaerials.com/viewer.

FIGURES AND ATTACHMENTS

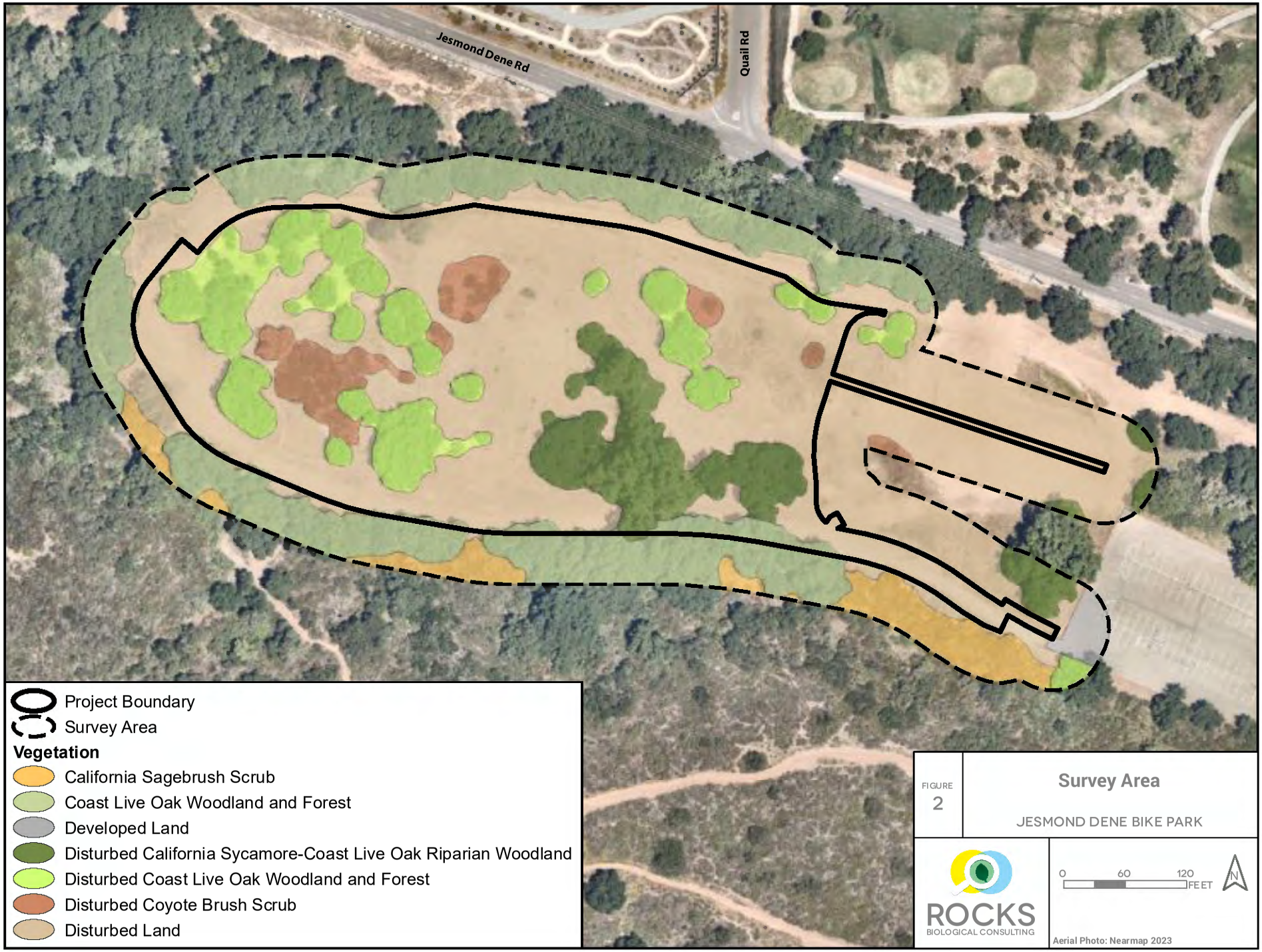
Figure 1. Project Location

Figure 2. Survey Area

Attachment A. Site Photos

Attachment B. Plant Species Observed


S.D. COUNTY
N Centre City Pkwy
Jesmond Dene Rd
N Broadway
JESMOND
DENE
PARK
ESCONDIDO
15
Rincon Ave
W Country Club Ln
ESCONDIDO
N Iris Ln
Vista Ave
N Ash St
ROD
MCLEOD
PARK
N Broadway
El Norte Pkwy
N Centre City Pkwy
78
Project Site
Project Boundary
FIGURE
1
Project Location
JESMOND DENE BIKE PARK
ROCKS
BIOLOGICAL CONSULTING
0
1,000
2,000
FEET
N
Aerial Photo: USDA NAIP 2024
Regional Map: National Geographic


Jesmond Dene Rd
Quail Rd
Project Boundary
Survey Area
Vegetation
California Sagebrush Scrub
Coast Live Oak Woodland and Forest
Developed Land
Disturbed California Sycamore-Coast Live Oak Riparian Woodland
Disturbed Coast Live Oak Woodland and Forest
Disturbed Coyote Brush Scrub
Disturbed Land
FIGURE
2
Survey Area
JESMOND DENE BIKE PARK
ROCKS
BIOLOGICAL CONSULTING
0
60
120
FEET
N
Aerial Photo: Nearmap 2023

Attachment A

Site Photographs

Photo 1. Representative view of the disturbed land and disturbed coast live oak (*Quercus agrifolia*) woodland and forest in the center of the project site, facing south. April 30, 2025.

Photo 2. View of the Goodding's willow-red willow riparian woodland and forest on the west side of the project site, facing southwest. May 30, 2025.

Photo 3. View of the north end of the project site, facing north. May 30, 2025.

Photo 4. View of project site from the eastern boundary, facing west. June 26, 2025.

Attachment B

Plant Species Observed

Family	Scientific Name	Common Name
Adoxaceae	*Sambucus nigra*	Blue elderberry
Amaranthaceae	*Amaranthus albus**	White tumbleweed
Amaranthaceae	*Amaranthus blitoides*	Prostrate amaranth
Anacardiaceae	*Malosma laurina*	Laurel sumac
Anacardiaceae	*Schinus molle**	Peruvian pepper tree
Anacardiaceae	*Toxicodendron diversilobum*	Western poison-oak
Apiaceae	*Foeniculum vulgare**	Sweet fennel
Apiaceae	*Lomatium* sp.	*Lomatium* parsley species
Arecaceae	*Phoenix canariensis**	Canary island date palm
Arecaceae	*Washingtonia robusta**	Mexican fan palm
Asteraceae	*Acourtia microcephala*	Sacapellote
Asteraceae	*Ambrosia psilostachya*	Western ragweed
Asteraceae	*Artemisia californica*	California sagebrush
Asteraceae	*Artemisia douglasiana*	Douglas mugwort
Asteraceae	*Baccharis pilularis*	Coyote brush
Asteraceae	*Baccharis salicifolia*	Mule-fat
Asteraceae	*Carduus pycnocephalus**	Italian thistle
Asteraceae	*Centaurea melitensis**	Tocalote
Asteraceae	*Deinandra fasciculata*	Clustered tarweed
Asteraceae	*Eriophyllum confertiflorum*	Yellow yarrow
Asteraceae	*Geranium* sp.	Geranium species
Asteraceae	*Hazardia squarrosa*	Southern sawtooth goldenbush
Asteraceae	*Heterotheca grandifolia*	Telegraph weed
Asteraceae	*Lactuca serriola**	Prickly lettuce
Boraginaceae	*Amsinckia menziesii* var. *intermedia*	Rigid fiddleneck
Boraginaceae	*Eucrypta chrysanthemifolia*	Common eucrypta
Boraginaceae	*Heliotropium curassavicum*	Salt heliotrope
Boraginaceae	*Phacelia cicutaria*	Caterpillar phacelia
Boraginaceae	*Phacelia ramosissimax*	Branching phacelia
Brassicaceae	*Hirschfeldia incana**	Short-pod mustard
Brassicaceae	*Sisymbrium altissimum*	Tumble mustard
Caprifoliaceae	*Lonicera subspicata*	Southern honeysuckle
Cucurbitaceae	*Marah macrocarpa*	Wild-cucumber

Family	Scientific Name	Common Name
Cyperaceae	*Cyperus virens**	Green flatsedge
Dryopteridaceae	*Dryopteris arguta*	Coastal woodfern
Entodontaceae	*Entodon seductrix*	Round-stem silk moss
Euphorbiaceae	*Croton setiger*	Doveweed
Euphorbiaceae	*Euphorbia maculata**	Spotted spurge
Euphorbiaceae	*Ricinus communis**	Castor bean
Fabaceae	*Acmispon americanus* var. *americanus*	Spanish-clover
Fabaceae	*Robinia pseudoacacia**	Black locust
Fagaceae	*Quercus agrifolia*	Coast live oak
Geraniaceae	*Erodium cicutarium*	Storksbill
Iridaceae	*Sisyrinchium bellum*	Blue-eyed grass
Lamiaceae	*Marrubium vulgare**	White horehound
Lamiaceae	*Salvia apiana*	White sage
Lamiaceae	*Salvia mellifera*	Black sage
Moraceae	*Ficus carica**	Edible fig
Myrsiniaceae	*Diplacus puniceus*	Coast monkey flower
Myrsiniaceae	*Lysimachia arvensis**	Scarlet pimpernel
Onagraceae	*Epilobium canum*	California fuschia
Plantaginaceae	*Keckiella antirrhinoides*	Chaparral beard tongue
Plantaginaceae	*Keckiella cordifolia*	Heart leaved keckiella
Plantaginaceae	*Plantago lanceolata**	English plantain
Plantanaceae	*Platanus racemosa*	Western sycamore
Poaceae	*Arundo donax**	Giant reed
Poaceae	*Avena barbata**	Slender wild oat
Poaceae	*Avena fatua**	Wild oat
Poaceae	*Bromus diandrus**	Ripgut brome
Poaceae	*Bromus madritensis**	Compact brome
Poaceae	*Bromus rubens**	Red brome
Poaceae	*Stipa miliacea**	Smilo grass
Poaceae	*Stipa pulchra*	Purple needle grass
Polygonaceae	*Eriogonum fasciculatum* var. *fasciculatum*	Coast California buckwheat
Polygonaceae	*Rumex crispus**	Curly dock
Pteridaceae	*Pentagramma triangularis*	Gold back fern

Family	Scientific Name	Common Name
Ranunculaceae	*Clematis* sp.	Clematis species
Ranunculaceae	*Thalictrum fendleri*	Fendler's meadow rue
Rhamnaceae	*Rhamnus crocea*	Redberry buckthorn
Rosaceae	*Heteromeles arbutifolia*	Toyon
Rosaceae	*Rosa californica*	California rose
Salicaceae	*Populus fremontii*	Fremont cottonwood
Salicaceae	*Salix gooddingii*	Goodding's black willow
Salicaceae	*Salix laevigata*	Red willow
Salicaceae	*Salix lasiandra*	Shining willow
Solanaceae	*Datura wrightii*	Jimsonweed
Solanaceae	*Nicotiana glauca**	Tree tobacco
Tamaricaceae	*Tamarix ramosissima**	Saltcedar
Non-native*		

APPENDIX E

2024 COASTAL CALIFORNIA GNATCATCHER (*POLIOPTILA CALIFORNICA CALIFORNICA*) SURVEY REPORT

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942
619.462.1515 tel
619.462.0552 fax
www.helixepi.com

August 9, 2024 00130.00058.001

Stacey Love
U.S. Fish and Wildlife Service
2177 Salk Ave., Suite 250
Carlsbad , CA 92008

Subject: 2024 Coastal California Gnatcatcher (*Polioptila californica californica*) Survey Report for the Jesmond Dene Project

Dear Stacey Love:

This letter presents the results of a U.S. Fish and Wildlife Service (USFWS) protocol presence/absence survey for the federally listed as threatened coastal California gnatcatcher (*Polioptila californica californica*; CAGN) conducted by HELIX Environmental Planning, Inc. (HELIX) for the Jesmond Dene Project (Project). This report describes the methods used to perform the survey and the results. It is being submitted to the USFWS as a condition of HELIX's Threatened and Endangered Species Permit ES-778195-15.

PROJECT LOCATION

The approximately 4.1-acre Jesmond Dene Project is in the City of Escondido, San Diego County, California (Figure 1, *Regional Location*). It is depicted within Section 33 of Township 11 South, Range 2 West on the Valley Center U.S. Geological Survey (USGS) 7.5-minute quadrangle map (Figure 2, *USGS Topography*). Specifically, the project is generally located south of Jesmond Dene Road and west of North Broadway (Figure 3, *Aerial Photograph*).

A portion of the project occurs within USFWS-designated critical habitat for the species (Figure 3).

METHODS

The survey consisted of six visits that were performed by HELIX biologist Amanda Mathews (ES-778195-15) between May 17 and June 25, 2024 (Table 1, *Survey Results*), in accordance with the current USFWS protocol[1]. The visits were conducted at least seven days apart, between 6 a.m. and 12 p.m., pursuant to

[1] U.S. Fish and Wildlife Service (USFWS). 1997. Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. 5pp.

survey protocol. The project location is not within the Natural Communities Conservation Plan program; therefore, the USFWS requires that a minimum of six surveys be conducted, at least one week apart, during the breeding season (March 15 and June 30) or a minimum of nine surveys be conducted, at least two weeks apart, during the non-breeding season (July 1 and March 14). The survey area encompassed approximately 7.0 acres of potential CAGN habitat within the proposed project site and within 300 feet from the project site (Figure 4, *2024 Coastal California Gnatcatcher Survey Results*).

The surveys were conducted by walking within and along the perimeter of suitable CAGN habitat present within the survey area. The survey route was arranged to ensure complete coverage of habitat with potential for occupancy by CAGN. Surveys were conducted with binoculars to aid in bird detection. Recorded CAGN vocalizations were played sparingly and only if other means of detection had failed. The approximate survey route is depicted on Figure 4.

Table 1 details the survey dates, times, and conditions.

Table 1
SURVEY INFORMATION

Site Visit	Survey Date	Biologist(s)	Time (Start/Stop)	Approx. Acres Surveyed/ Acres per Hour	Weather Conditions (Start/Stop)
1	5/17/2024	Amanda Mathews[1]	0830/1030	7.0 ac/ 3.5 ac/hr*	61°F, wind 1-4 mph, 100% cloud cover 64°F, wind 1-4 mph, 100% cloud cover
2	5/24/2024	Amanda Mathews[1]	0900/1015	7.0 ac/ 5.6 ac/hr*	61°F, wind 0-2 mph, 100% cloud cover 62°F, wind 0-2 mph, 100% cloud cover
3	5/31/2024	Amanda Mathews[1]	0800/0900	7.0 ac/ 7.0 ac/hr*	58°F, wind 0-4 mph, 100% cloud cover 62°F, wind 0-3 mph, 100% cloud cover
4	6/7/2024	Amanda Mathews[1]	0700/0815	7.0 ac/ 5.6 ac/hr*	61°F, wind 0-3 mph, 100% cloud cover 63°F, wind 0-3 mph, 100% cloud cover
5	6/14/2024	Amanda Mathews[1]	0930/1100	7.0 ac/ 4.7 ac/hr*	69°F, wind 1-4 mph, 0% cloud cover 73°F, wind 1-4 mph, 0% cloud cover
6	6/25/2024	Amanda Mathews[1]	1030/1130	7.0 ac/ 7.0 ac/hr*	80°F, wind 1-2 mph, 0% cloud cover 82°F, wind 1-2 mph, 0% cloud cover

[1] USFWS Permit ES-778195-15
*ac – acre; hr – hour

COASTAL CALIFORNIA GNATCATCHER HABITAT

Diegan coastal sage scrub is the only vegetation communities determined to be suitable for CAGN (Figure 4; vegetation mapping completed by Rocks Biological Consulting).

Diegan Coastal Sage Scrub (including disturbed)

Coastal sage scrub is one of the two major shrub types that occur in southern California, occupying xeric sites characterized by shallow soils (the other is chaparral). Four distinct coastal sage scrub geographical associations (northern, central, Venturan, and Diegan) are recognized along the California coast. Diegan coastal sage scrub may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within Diegan coastal sage scrub include California sagebrush (*Artemisia*

californica), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), and black sage (*Salvia mellifera*). Disturbed coastal sage scrub contains many of the same shrub species as undisturbed Diegan coastal sage scrub but is sparser and has a higher proportion of non-native annual species. Diegan coastal sage scrub within the survey area is dominated primarily by California sagebrush, California buckwheat, black sage, laurel sumac, toyon (*Heteromeles arbutifolia*) and chaparral beardtongue (*Keckiella antirrhinoides*).

RESULTS

The coastal California gnatcatcher was not detected during the survey effort and is presumed to be absent from the project site (Figure 4).

CERTIFICATION

I certify that the information in this survey report and attached exhibit fully and accurately represents my work.

Please contact Laura Moreton or me at (619) 462-1515 if you have any questions.

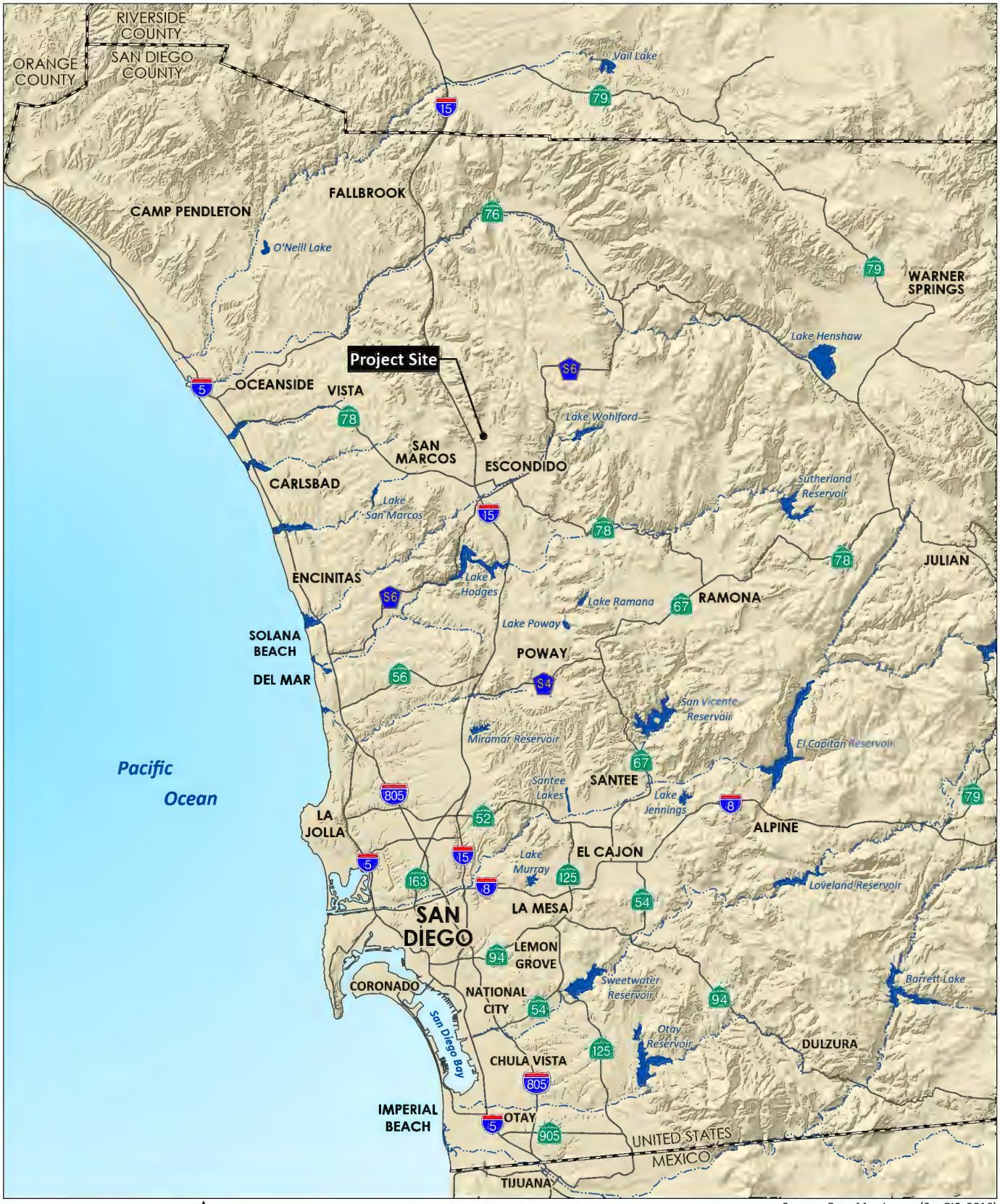
Sincerely,

Amanda Mathews
Biologist

Attachments:

Figure 1: Regional Location
Figure 2: USGS Topography
Figure 3: Aerial Photograph
Figure 4: 2024 Coastal California Gnatcatcher Survey Results

Jesmond Dene



I:\PROJECTS\E\EscondidoCity_00130\00058_JesmondDene\Map\CAGN\Figures.aprx 00130.00058.0017/10/2024 - RK

0 8 Miles

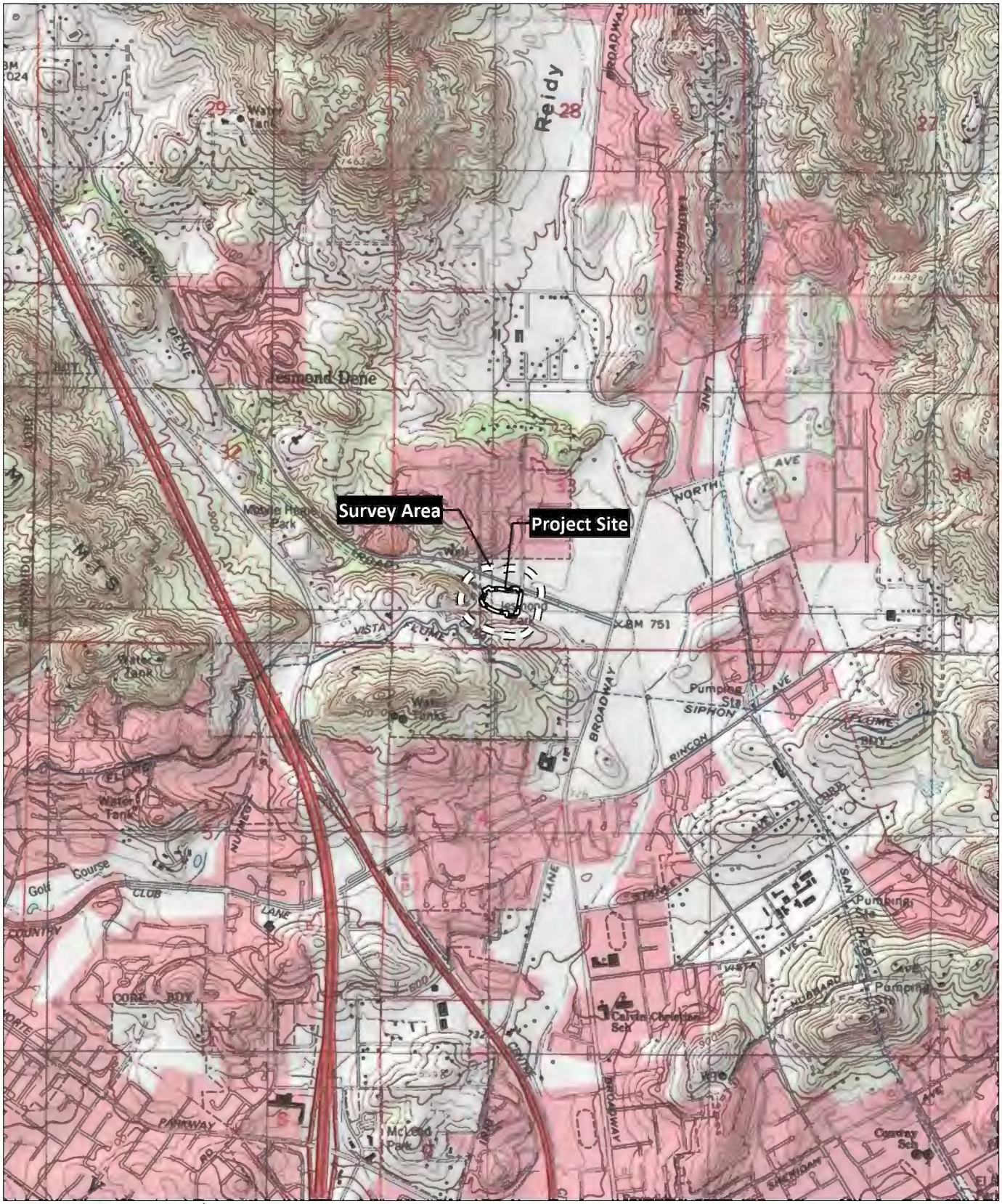
Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1

Jesmond Dene



0 2,000 Feet

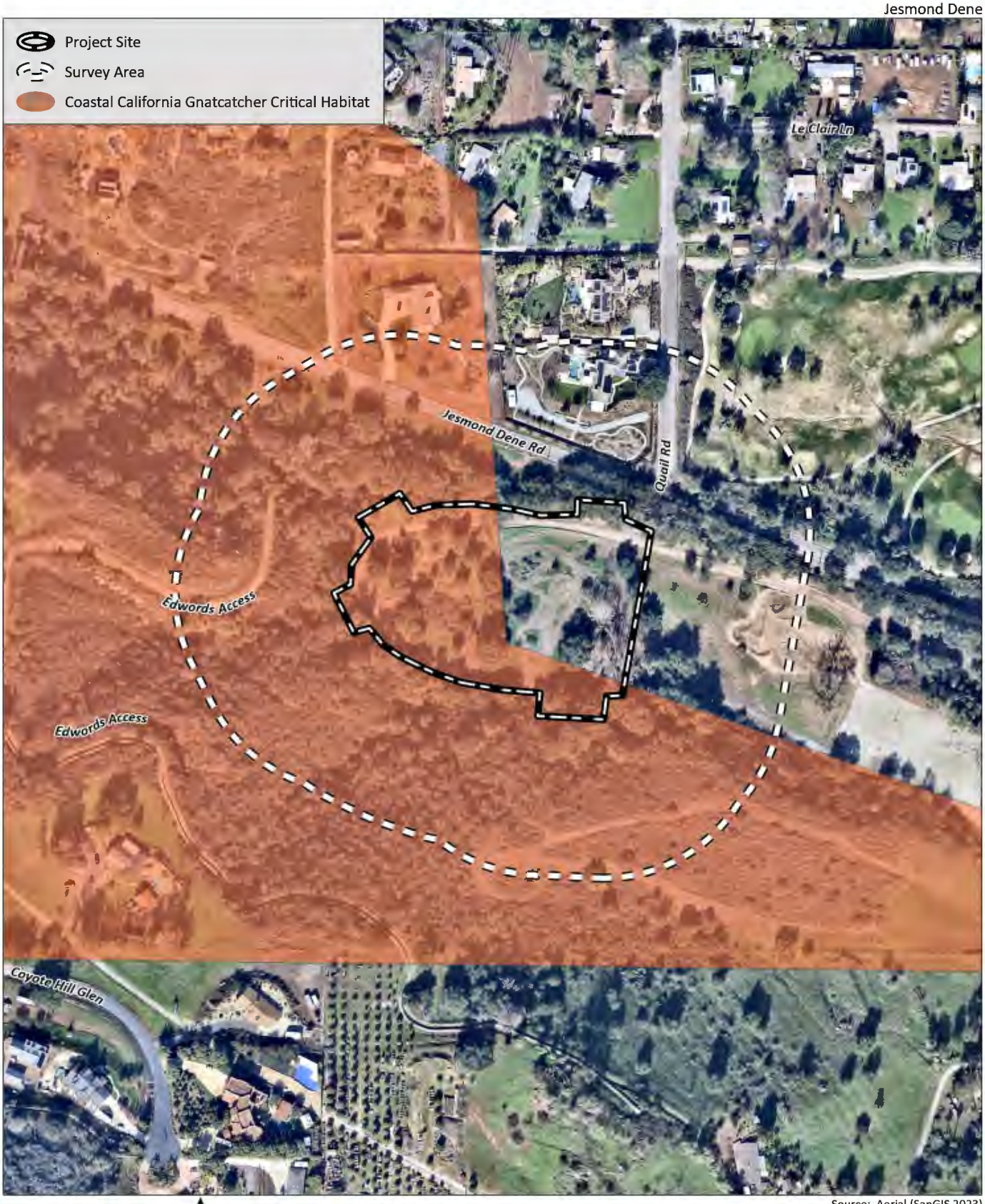
Source: Valley Center 7.5' Quad (USGS)

HELIX Environmental Planning

USGS Topography

Figure 2

Jesmond Dene



I:\PROJECTS\E\EscondidoCity_00130\00058_JesmondDene\Map\CAGN\Figures.aprx Fig3_Aerial : 00130.00058.001: 7/15/2024 - RK

0 250 Feet

Source: Aerial (SanGIS 2023)

HELIX Environmental Planning

Aerial Photograph

Figure 3

Jesmond Dene

Source: Aerial (SanGIS 2023); Vegetation (Rocks Biological Consulting)

E:\PROJECTS\E\EscondidoCity_00130\00058_JesmondDene\Map\C4GN\Figures.aprx Fig4_SurveyResults : 00130.00058.001: 8/8/2024 - RK

HELIX Environmental Planning

2024 Coastal California Gnatcatcher Survey Results

Figure 4

APPENDIX F

2025 CROTCH'S BUMBLE BEE (*BOMBUS CROTCHII*) SURVEY REPORT

July 2, 2025

California Department of Fish and Wildlife
Attn: Mr. Justin Garcias
Wildlife Branch
P.O. Box 944209
Sacramento, CA 94244

Subject: 2025 Crotch's Bumble Bee (*Bombus crotchii*) Survey Report for the Jesmond Dene Bike Park Project, Riverside County, California

Mr. Garcias:

This report is a summary of the results of focused surveys for Crotch's bumble bee (*Bombus crotchii*, CBB) that Rocks Biological Consulting (RBC) conducted for the Jesmond Dene Bike Park Project (project) in the City of Escondido, San Diego County, California. No bumble bee (*Bombus*) species were documented within the survey area (project site and 50-foot buffer) during focused surveys.

Introduction

The project site is in the City of Escondido in San Diego County, California (Figure 1). The approximately 4.38-acre project site is south of Jesmond Dene Road, west of N Broadway Road, north of Flume Road, and southeast of Edwards Access Road. The project site is surrounded by a golf course and residential development to the north, sparse residential development and open space to the west, and denser residential development on the south and east.

The project would include construction of a bike park adjacent to the Jesmond Dene Park recreational area. Specifically, the project would enhance and formalize the existing bike paths and adjacent land. The bike park would be divided into three tracks, a pump track, a skill track, and a kids track, and would also include a multi-use loop trail around the outer perimeter of the park.

Crotch's Bumble Bee Natural History

CBB has experienced a sharp population decline over the past decade and is a candidate for listing under the California Endangered Species Act (CESA). Historically, CBB occurred from northern California south to Baja Mexico and from the coast to the central valley and southwestern desert, with some records as far as Nevada. However, since the early 2000's, a change in population ecology has been observed; CBB is found in approximately 75% of its historic range and has been extirpated from the northern extent of this range entirely. In addition, the species' persistence within its extant range is estimated to be approximately 20% of its historic occupancy[1].

[1] Hatfield, R., S. Jepsen, R. W. Thorp, L. Richardson, and S. Colla. 2015. Crotch bumble bee, Bombus crotchii. The IUCN Red List of Threatened Species 2015. Retrieved on August 2024, from https://www.iucnredlist.org/ja/species/44937582/46440211.

Though CBB is relatively tolerant of fragmented and/or semi-urban environments, habitat loss, climate change, and pesticide use are considered imminent threats to populations[2,3].

Suitable habitat for this species includes a variety of open shrub and grassland vegetation communities that support significant stands of nectar sources, mostly in the form of flowering annuals. CBB's primary nectar sources include *Medicago* spp., *Lupinus* spp., *Chaenactis* spp., *Asclepias* spp., *Phacelia* spp., and *Salvia* spp., which have easily accessible nectar that accommodates CBB's relatively short tongue. CBB nest underground, often in abandoned small mammal burrows or similar cavities, and move to a different nest site each year[4]

Methods

Prior to conducting focused surveys, RBC queried the California Department of Fish and Wildlife (CDFW) Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS) for CBB records within a 10-mile radius of the project site[5,6].

RBC biologists Ian Hirschler and Jim Rocks conducted focused surveys of all suitable habitat within the survey area in accordance with the CDFW's *Survey Considerations for CESA Candidate Bumble Bee Species*[7]. Surveys were performed two to four weeks apart during the Colony Active Period (April – August) when CBB detection is at its peak. Surveys occurred at least an hour after sunrise and at least two hours before sunset, on warm, but not hot, sunny days (65-90 degrees Fahrenheit [F]), with winds of less than eight miles per hour. Surveys were conducted by walking through the survey area focusing on areas where ample nectar sources were present. During the survey, all observed insects, arachnids, and nectar sources were identified to the highest taxonomic level possible and recorded in field notebooks.

All surveyors were prepared to record the location, associated plant taxa, population size, and nesting status of any observed CBB and to collect non-lethal photo vouchers captured at various angles to confirm accurate identification.

Results

Existing Conditions

The project site itself is a relatively flat parcel that is bisected by multiple dirt walking/biking paths. Portions of the project site are being used as a bike park with dirt ramps and jumps. The survey area is composed of six vegetation communities and land uses including California sagebrush scrub, coast live oak woodland and forest, disturbed coast live oak woodland and forest, disturbed

---

[2] California Department of Fish and Wildlife (CDFW). 2022. *California Department of Fish and Wildlife News room*. Retrieved from https://wildlife.ca.gov/News/cdfw-seeks-public-comment-related-to-crotchs-bumble-bee-franklins-bumble-bee-suckleys-cuckoo-bumble-bee-and-western-bumble-bee#gsc.tab=0.

[3]Williams, P., R. W. Thorp, L. Richardson, and S. Colla. 2014. Bumble Bees of North America: An identification guide. Princeton University Press.

[4] Ibid.

[5] CDFW. 2025. California Department of Fish and Game Natural Diversity Database – Electronic Format. Retrieved June 2025.

[6] CDFW. 2025. Biogeographic Information and Observation System. Retrieved June 2025, from https://wildlife.ca.gov/Data/BIOS.

[7] CDFW. 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Retrieved May 2025, from https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline.

southern sycamore-alder riparian woodland, disturbed northern coyote bush scrub, developed land and disturbed land[8] (Figure 2).

The survey area supports minimal habitat and nectar sources appropriate for CBB. The available small mammal burrows and thatch observed within the project site provide low nesting and overwintering potential. Additionally, no CBB has been previously recorded within five miles of the project site. The nearest record of CBB is approximately seven miles southwest of the project site near Double Peak Regional Park[9,10]. Based on the results of the habitat assessment, including the potential availability and diversity of nectar sources and the lack of CBB records in the vicinity of the project site, the potential for CBB to occur on the project site was considered low.

Nectar availability on site varied during each survey as flowering plants on site bloomed and then senesced throughout the survey period (April 30 through June 26, 2025). Representative site photographs are presented in Attachment A. Black sage (*Salvia mellifera*), short-pod mustard (*Hirschfeldia incana*), and salt heliotrope (*Heliotropium curassavicum*) provided the most suitable nectar sources for CBB within the survey area. A list of observed nectar sources is presented in Attachment B.

Precipitation Data

Table 1, below, describes the estimated monthly total precipitation for the project site from July 2024 through June 2025 from the NRCS database for the Escondido No. 2, CA station[11].

The project area received approximately 7.39 inches of rain from July 2024 through June 2025. Escondido averages approximately 15.0 inches of rainfall annually[12]. Reduced precipitation rates during the 2024–2025 rainy season contributed to a decrease in nectar availability within the project site in terms of both the density and duration of flowering plants.

Table 1. Monthly Precipitation Data (Inches) for July 2024 through June 2025

July 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	June 2025	Total Rainfall
0.00	0.00	0.03	0.00	0.18	0.04	0.54	2.31	3.80	0.21	0.28	M	7.39
M indicates missing data												

Focused Surveys

RBC conducted three focused CBB surveys during the Colony Active Period between April 30 and June 26, 2025. Survey dates, conditions, and personnel are presented in Table 2, below.

[8] Holland, R. F. (1986). Preliminary descriptions of the terrestrial natural communities of California. State of California, the Resources Agency, Dept. of Fish and Game.
[9] CDFW. 2025. California Department of Fish and Game Natural Diversity Database – Electronic Format. Retrieved April 2025.
[10] CDFW. 2025. Biogeographic Information and Observation System. Retrieved June 2025, from https://wildlife.ca.gov/Data/BIOS.
[11] NRCS. 2025. AgACIS for Riverside County. Monthly Total Precipitation for ELSINORE, CA. Accessed April 2025.
[12] WorldClimate. 2025. Average Weather for California. Retrieved July 2, 2025.

Table 2. Crotch's Bumble Bee Survey Dates/Conditions

Survey Round	Date	Surveyor(s)	Time (Start-End)	Temperature (F) (Start-End)	Cloud Cover (%) (Start-End)	Wind Speed (mph) (Start; End)
1	4/30/25	IH, JR	1220-1350	70-72	20-10	2-5; 2-5
2	5/30/25	IH	1100-1200	84-85	0-0	2-5; 2-5
3	6/26/25	JR	1230-1440	76-79	0-0	3-8; 3-8
Surveyors: IH=Ian Hirschler; JR=Jim Rocks						

No CBB and no other bumble bees were documented within the survey area during focused surveys conducted between April 30 and June 26, 2025. A list of invertebrate species observed is presented as Attachment C, and surveyor field notes are provided in Attachment D.

Surveyor Qualifications

Mr. Hirschler is a senior biologist with over 11 years of professional experience and a Bachelor of Science in wildlife biology. Mr. Hirschler holds a CDFW 2081(a) Memorandum of Understanding (MOU) to conduct presence/absence surveys for CBB via capture and handle. Mr. Rocks is a Principal Biologist with over 25 years of professional experience and a Master of Science degree in biological sciences. All surveyors have taken entomological courses that included bumble bee identification. They each have experience conducting focused CBB surveys and are familiar with the identifying characteristics and preferred nectar sources of CBB.

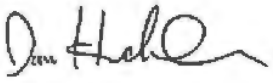
Conclusion

No CBB and no other bumble bees were documented within the survey area during focused surveys conducted between April 30 and June 26, 2025.

Please don't hesitate to call me at (714) 345-8619 if you have any questions.

I certify that the information in this survey report and attached exhibits fully and accurately represents my work.

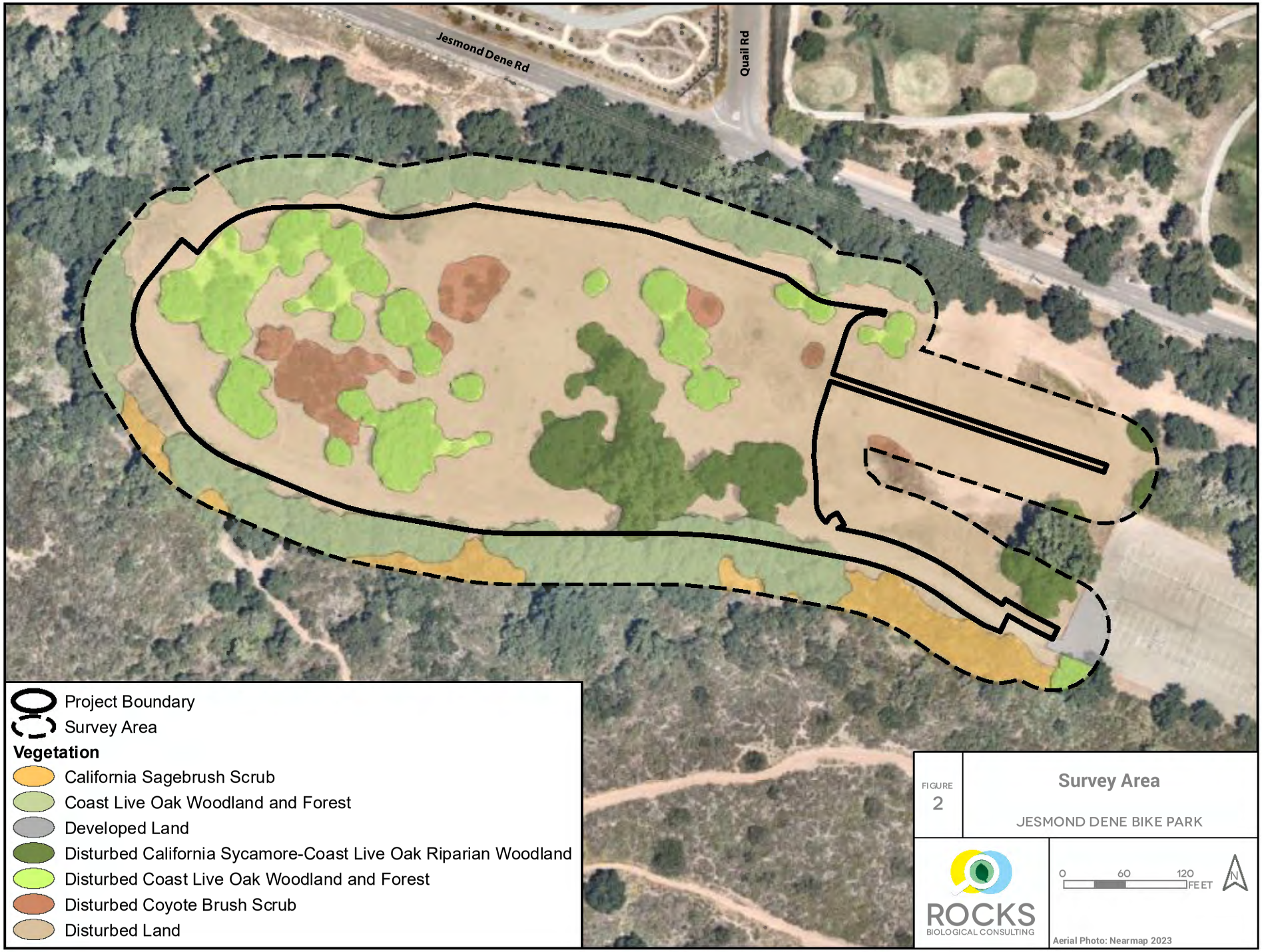
Sincerely,



Ian Hirschler

Enclosures: Figure 1 – Project Location
Figure 2 – Survey Area
Attachment A – Site Photographs
Attachment B – Nectar Sources Observed
Attachment C – Insect Species Observed
Attachment D – Surveyor Field Notes


S.D. COUNTY
N Centre City Pkwy
Jesmond Dene Rd
N Broadway
JESMOND
DENE
PARK
ESCONDIDO
15
Rincon Ave
W Country Club Ln
ESCONDIDO
N Iris Ln
Vista Ave
N Ash St
ROD
MCLEOD
PARK
N Broadway
El Norte Pkwy
N Centre City Pkwy
78
Project Site
Project Boundary
FIGURE
1
Project Location
JESMOND DENE BIKE PARK
ROCKS
BIOLOGICAL CONSULTING
0
1,000
2,000
FEET
N
Aerial Photo: USDA NAIP 2024
Regional Map: National Geographic


Jesmond Dene Rd
Quail Rd
Project Boundary
Survey Area
Vegetation
California Sagebrush Scrub
Coast Live Oak Woodland and Forest
Developed Land
Disturbed California Sycamore-Coast Live Oak Riparian Woodland
Disturbed Coast Live Oak Woodland and Forest
Disturbed Coyote Brush Scrub
Disturbed Land
FIGURE
2
Survey Area
JESMOND DENE BIKE PARK
ROCKS
BIOLOGICAL CONSULTING
0
60
120
FEET
N
Aerial Photo: Nearmap 2023

Attachment A

Site Photographs

Photo 1. Representative view of the disturbed land and disturbed coast live oak (*Quercus agrifolia*) woodland and forest in the center of the project site, facing south. April 30, 2025.

Photo 2. View of the Goodding's willow-red willow riparian woodland and forest on the west side of the project site, facing southwest. May 30, 2025.

Photo 3. View of the north end of the project site, facing north. May 30, 2025.

Photo 4. View of project site from the eastern boundary, facing west. June 26, 2025.

Attachment B

Nectar Sources Observed

Family	Common Name	Scientific Name
Asteraceae	Sacapellote	*Acourtia microcephala*
Asteraceae	Italian thistle*	*Carduus pycnocephalus*
Asteraceae	Tocalote*	*Centaurea mellitensis*
Asteraceae	Golden yarrow	*Eriophyllum confertiflorum*
Boraginaceae	Salt heliotrope	*Heliotropium curassavicum*
Brassicaceae	Short pod mustard*	*Hirschfeldia incana*
Brassicaceae	London rocket*	*Sisymbrium irio*
Caprifoliaceae	Johnston's honeysuckle	*Lonicera subspicata* var. *denudata*
Euphorbiaceae	Turkey-mullein	*Croton setiger*
Linaceae	Black sage	*Salvia mellifera*
Phrymaceae	Coast monkey flower	*Diplacus puniceus*
Polygonaceae	Coast California buckwheat	*Eriogonum fasciculatum* var. *fasciculatum*
Rhamnaceae	Woolly ceanothus	*Ceanothus tomentosus*
Viburnaceae	Blue elderberry	*Sambucus mexicana*
*Non-native species		

Attachment C

Invertebrates Observed

Order	Family	Scientific Name	Common Name
Diptera	Bombyliidae		Bee fly
Diptera	Syrphidae		Hoverfly
Hemiptera	Cicadidae		Cicada
Hymenoptera	Apidae	*Apis mellifera*	Honey bee
Hymenoptera	Apidae	*Xylocopa californica*	California carpenter bee
Lepidoptera	Nymphalidae	*Adelpha californica*	California sister
Lepidoptera	Nymphalidae	*Vanessa cardui*	Painted lady
Lepidoptera	Papilionidae	*Papilio rutulus*	Western tiger swallowtail
Lepidoptera	Pieridae	*Pieris rapae*	Cabbage white