Appendix D

Biological Resources Technical Report

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Biological Resources Technical Report

San Diego State University Evolve Student Housing Project

DECEMBER 2024

Prepared for:

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Summary of Findings

This report presents the results of Dudek's biological resources study for the San Diego State University Evolve Student Housing Project (proposed project). The proposed project includes the redevelopment of two student housing complexes at two different locations on the campus located in the City of San Diego, California.

The proposed project includes the construction and development of new student housing, dining, and auxiliary uses on and adjacent to San Diego State University's main campus, as well as related brush management, The proposed project site is comprised of two components—as well as an additional study area—which are discussed throughout the report: (1) the Peninsula Component, which would be located adjacent to the main San Diego State University campus at the northern terminus of 55th Street; and (2) the University Towers East Component, which would be located east and immediately adjacent to the existing University Towers on Montezuma Road. The additional Peninsula Study Area, to be distinguished from the Peninsula Component, encompasses the majority of the immediate parcels surrounding the Peninsula Component and is *not* proposed for development.

The purpose of this report is to (1) describe the conditions of biological resources associated with each of the Project Component boundaries as well as the Peninsula Study Area boundary in terms of vegetation communities, plants, wildlife, wildlife habitats, and aquatic resources; (2) quantify potential direct impacts and qualitatively describe indirect impacts to biological resources that would result from implementation of the proposed Project; (3) discuss those impacts in terms of biological significance in view of federal, state, and local laws and policies; and (4) specify measures to avoid, minimize, and/or mitigate any significant impacts that would occur to biological resources as a result of project implementation.

Vegetation mapping for the proposed project site was conducted in August and September of 2024. Based on species composition and general physiognomy, one native plant community, Diegan coastal sage scrub, (predominantly disturbed) was identified within the Peninsula Study Area. Also identified within the Peninsula Study Area were four non-native vegetation types including ornamental, eucalyptus woodland, non-native riparian, and disturbed land, as well as one land cover type, unvegetated channel. Within the Peninsula Component, one native plant community, Diegan coastal sage scrub, (predominantly disturbed), three non-native vegetation types including ornamental, eucalyptus woodland, and disturbed land, as well as one land cover type, urban/developed, were identified. Within the University Towers East Component only one land cover type, urban/developed, was identified.

There is potential for the federally listed coastal California gnatcatcher (*Polioptila californica californica*) to be present within the disturbed Diegan coastal sage scrub habitat within the Peninsula Study Area, as well as in a small portion of the Peninsula Component where this habitat is also present. Therefore, focused surveys for the coastal California gnatcatcher commenced in October 2024 and will be completed in early 2025. Focused botanical surveys within the disturbed Diegan coastal sage scrub habitat within the Peninsula Study Area, as well as the small portion of the Peninsula Component where this habitat is also present, are planned for spring and summer of 2025. The University Towers East Component is completely within urban/developed areas, and no focused surveys will be conducted within this component.

Based on the jurisdictional delineation conducted in 2017 for the SDSU New Student Housing project (Dudek 2017), one drainage was identified within the Peninsula Study Area. This feature will not be impacted

The proposed project would result in permanent direct impacts to 14.27 acres within the Peninsula Component and University Towers East Component combined. Of this, 13.71 acres of these impacts would be to existing urban/developed, ornamental, and disturbed land covers and vegetation and would be associated with the redevelopment areas in both components and brush management zone 1 in the Peninsula Component. The remaining 0.55 acres of disturbed Diegan coastal sage scrub (a sensitive natural community) and related impacts would result within brush management zone 2 within the Peninsula Component.

Potential significant impacts are limited to potential direct and indirect effects of construction on breeding birds, special-status plants and vegetation, and special-status wildlife (including coastal California gnatcatcher), if determined to be present. If construction does take place during the nesting bird season, nesting surveys and/or biological monitoring would be conducted prior to and/or during to avoid all potential impacts to nests or nesting birds. Special-status plants including San Diego goldenstar *(Bloomeria clevelandii*), small-flowered morning-glory (*Convolvulus simulans*), San Diego barrel cactus (*Ferocactus viridescens*), and ashy spike-moss (*Selaginella cinerascens*) will be surveyed for in spring and summer of 2025 to determine presence and/or absence. Until surveys are completed, any special-status species with a potential to occur on site would be assumed to be present within suitable habitat and a potentially significant impact would be identified with appropriate mitigation proposed. Mitigation to reduce impacts to a level of less than significant includes the purchase of credits in a mitigation bank, avoidance of the breeding bird season, or preconstruction surveys for nesting birds, implementation of construction monitoring and reporting, invasive species prohibition, construction fencing and noise monitoring, (including noise limitations/setbacks, if necessary), as well as potential mitigation for operational amplified field noise. With implementation of recommended mitigation, potential impacts to biological resources would be reduced to less than significant.

1 Introduction

The Board of Trustees of the California State University, which is the State of California acting in its higher education capacity, is the lead agency responsible for certifying the adequacy and completeness of the environmental impact report prepared under the California Environmental Quality Act ("CEQA") on behalf of San Diego State University (SDSU). The California State University (CSU) is not subject to the City of San Diego/College Area Community Planning Area. As a requirement of the environmental impact report, Dudek has completed this biological resources technical report for the proposed SDSU Evolve Student Housing Project (project).

1.1 Regional and Local Setting

The proposed project is located in the northwestern and southern-central portions of the main SDSU campus, approximately 8 miles east of downtown San Diego (Figure 1, Regional Map). The SDSU campus is located within the College Area Community Planning Area in the City of San Diego (City). The SDSU campus can be accessed from the north by College Avenue, which also provides local access to Interstate (I) 8. The campus can be accessed from the south by Montezuma Road, an east–west roadway near the southern boundary of the campus. Montezuma Road also connects with I-8 via Fairmont Avenue to the west and El Cajon Boulevard to the east.

The study area for the proposed project is composed of three areas: the Peninsula Component, the University Towers East Component, and the Peninsula Study Area. Both Components and the Peninsula Study Area fall within Section 15 of Township 16 South, Range 2 West of the La Mesa, California 7.5-minute U.S. Geological Survey (USGS) Quadrangle (Figure 2, Vicinity Map).

The Peninsula Component is located within an approximately 13.67 acre area in the northwest portion of campus where 55th Street ends, south of I-8 and west of Canyon Crest Drive. The Peninsula Component is bound by undeveloped canyon to the west, north, and east, and student housing buildings and Aztec Circle Drive to the south. The Peninsula Study Area encompasses the parcels immediately surrounding and abutting the Peninsula Component that are owned by SDSU and/or its auxiliaries acting through the State of California (Figure 3A, Peninsula Component and Study Area Biological Resources). The approximate centroid of the Peninsula Component and Peninsula Study Area is 32°46'39.6"N 117°04'38.6"W and is located on Assessor's Parcel Numbers 4622301900, 4621800900, 4614500900, 4621801000, 4621800100, 4622200100, 4622200200, 4622200300, 4622200400, and 4621300700.

The University Towers East Component is located on a 1.30 acre area on Montezuma Road that is currently utilized as a parking lot at the address 5505 Montezuma Road. The University Towers East Component is bound by Montezuma Road to the north, the University Towers student housing building to the west, apartment-style to the east, and Mary Lane Drive and single-family residential development to the south (Figure 3B, University Towers East Component Biological Resources). The approximate centroid of the University Towers East Component is 32°46'13.5"N 117°04'29.9"W and is located on Assessor's Parcel Number 4663001200.

1.2 Project Description

The proposed Project is the construction and development of new student housing, dining, and auxiliary uses on and adjacent to SDSU's main campus. The proposed Project is comprised of two components: the Peninsula Component, which would be located on and adjacent to the main SDSU campus at the northern terminus of 55th Street; and the

University Towers East Component, which would be located east and immediately adjacent to the existing University Towers on Montezuma Road.

The proposed Peninsula Component would be located on an approximately 13.67 acre site adjacent to the northwest portion of campus, just south of I-8 and west of Canyon Crest Drive. Development of the Peninsula Component would include phased demolition of all 13 existing buildings, which presently provide housing for 702 students, and the subsequent phased development of one 9-story student housing building and five student housing buildings up to 13 stories in height that would contain a total of approximately 4,450 student beds.

The housing to be developed on the Peninsula Component site would be constructed in phases. Initially, four student housing buildings, as well as the amenities building, would be constructed. In the remaining temporary open area in the southwestern corner of the site, which consists of urban/developed land cover, temporary sports fields would be built for recreational use. During subsequent construction phases, the sports fields would be removed and replaced by the remaining proposed student housing.

The proposed University Towers East Component would be developed on an approximately 1.30-acre site located immediately east of the existing University Towers Building, south of Montezuma Road. The existing parking lot would be demolished to allow for redevelopment of the site to include a new 9-story student housing building that would accommodate approximately 720 students. Development of the proposed project would result in approximately 5,170 new student beds, a net increase of approximately 4,470 student beds to the main campus inventory.

2 Methodology

Data regarding biological resources present within the proposed project site were obtained through a review of pertinent literature, field reconnaissance, and resource mapping. Each method is described in detail below.

2.1 Literature Review

To assess biological resources and potential constraints, Dudek biologists reviewed available relevant literature and data on sensitive habitats and species distribution to determine those resources that have the potential for occurrence within the La Mesa USGS 7.5-minute quadrangle map and the surrounding eight quadrangle maps. The review included the following:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB 2024) including the Del Mar, Poway, San Vicente Reservoir, La Jolla, La Mesa, El Cajon, Point Loma, National City, and Jamul Mountains USGS Quadrangle Maps
- California Native Plant Society Inventory of Rare and Endangered Plants (CNPS 2024) for the La Mesa and surrounding 7.5-minute USGS quadrangles
- U.S. Fish and Wildlife Service (USFWS) Critical Habitat and Occurrence Database (USFWS 2024a) including USGS 7.5-minute La Mesa and surrounding 7.5-minute USGS quadrangles
- U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey (USDA 2024a) to identify soil types occurring within the proposed project site
- USFWS National Wetlands Inventory (USFWS 2024b)
- USGS National Hydrography Dataset (USGS 2023)
- San Diego County Bird Atlas (Unitt 2004)
- American Ornithologists' Union (AOU 2024).
- San Diego Natural History Museum's Plant Atlas (SDNHM 2024)
- SDSU New Student Housing Project Biological Resources Technical Report. Prepared for San Diego State University. Encinitas, California (Dudek 2017)
- Google Earth (2024)

2.2 Field Reconnaissance

Biological field surveys for the proposed project began in August 2024 and are scheduled to continue throughout 2025. To date, Dudek has conducted an initial biological reconnaissance survey and vegetation mapping. Focused surveys for coastal California gnatcatcher began in October 2024 and are currently ongoing. Rare plant surveys are scheduled to take place in the spring and summer of 2025 in two passes. Table 1 lists the dates, conditions, and survey focus for each survey performed, as well as anticipated schedule of upcoming surveys.

Table 1. Survey Schedule

Date	Hours	Personnel	Focus	Conditions
8/16/2024	11:00 a.m.–2:45 p.m.	Shana Carey, Jessica Baiza	Biological Reconnaissance Survey, Vegetation Mapping	80°F –90°F; 0%–10% cloud cover; 0–3 mph wind
9/17/2024	9:30 a.m.–1:45 p.m.	Shana Carey	Updating Vegetation Mapping	75°F –80°F; 10%–30% cloud cover; 0–3 mph wind
10/9/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #1	56°F –70°F; 30%–100% cloud cover; 0–3 mph wind
10/24/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #2	60°F –68°F; 20%–30% cloud cover; 0–3 mph wind
11/7/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #3	59°F –67°F; 10% cloud cover; 0–8 mph wind
11/21/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #4	50°F –66°F; 0%–30% cloud cover; 0–3 mph wind
12/5/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #5	55°F –67°F; 90%–100% cloud cover; 0–3 mph wind
12/19/2024	6:00 a.m. -12:00 p.m.	Erin Bergman, Katelin Pedersen	Coastal California gnatcatcher survey #6	TBD
1/2/2025	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #7	TBD
1/16/2025	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #8	TBD
1/30/2025	6:00 a.m. -12:00 p.m.	Erin Bergman, Shana Carey	Coastal California gnatcatcher survey #9	TBD
4/2025	TBD	Erin Bergman	Spring Rare Plant Survey	TBD
6/2025	TBD	Erin Bergman	Summer Rare Plant Survey	TBD

2.3 Resource Mapping

Vegetation communities and land covers on and within 100 feet of the proposed project site were mapped in the field directly onto a 200-foot-scale (1 inch = 200 feet) aerial photograph-based field map (Bing 2024). Following completion of the fieldwork, all vegetation polygons were transferred to a topographic base and digitized using ArcGIS, and geographic information system coverage was created by Senior Geographic Information System Analyst Lesley Terry. Once in ArcGIS, the acreage of each vegetation community and land cover present on site was determined.

Vegetation community classifications used in this report follow Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) and the Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008), where feasible, with modifications to accommodate the lack of conformity of the observed communities to those of Holland (1986) or Oberbauer et al. (2008).

2.4 Botanical Surveys

To date, no focused botanical surveys have been conducted, only a reconnaissance survey and vegetation mapping. A list of plants observed during the field efforts thus far is included in Appendix A. No special-status plant species have been observed to date.

Focused botanical surveys for special-status plants are scheduled to be conducted in two passes in the spring and summer of 2025. Dudek has reviewed and evaluated plant records in the USGS 7.5-minute La Mesa quadrangle and the surrounding Del Mar, Poway, San Vicente Reservoir, El Cajon, Point Loma, National City, and Jamul Mountains quadrangles (CDFW 2024; CNPS 2024; USFWS 2024) to determine target species (discussed in Section 3.4). Dudek's knowledge of biological resources and regional distribution of each species, as well as elevation, habitat, and soils present within the rare plant survey area, was used to determine the potential for various special-status plant species to occur. Surveys would be conducted at the appropriate phenological stage (blooming and fruiting) to detect and identify target species. Field survey methods would conform to California Native Plant Society Botanical Survey Guidelines (CNPS 2001); Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018); and General Rare Plant Survey Guidelines (Cypher 2002). Surveys would be conducted by walking meandering transects throughout the proposed project site to detect special-status species. If found, special-status plant observations would be mapped in the field using the Esri Collector mobile application to record the location and population number of special-status plant occurrences.

Once botanical surveys commence, all native and naturalized plant species encountered within the site would be identified and recorded. Latin and common names for plant species with a California Rare Plant Rank (CRPR) (formerly the California Native Plant Society List) would follow the California Native Plant Society Online Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2024). For plant species without a CRPR, Latin names would follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2024), and common names would follow the U.S. Department of Agriculture Plants Database (USDA 2024b).

As further explained below, until surveys are completed, any special-status species with a potential to occur on site would be assumed to be present within suitable habitat and a potentially significant impact would be identified with appropriate mitigation proposed.

2.5 Wildlife Surveys

A reconnaissance survey and vegetation mapping were conducted in August and September of 2024. A list of wildlife observed during the field efforts thus far is included in Appendix B. No special-status wildlife species have been observed to date.

Dudek has reviewed and evaluated wildlife records in the USGS 7.5-minute La Mesa quadrangle and the surrounding Del Mar, Poway, San Vicente Reservoir, El Cajon, Point Loma, National City, and Jamul Mountains quadrangles (CDFW

2024; USFWS 2024) to determine wildlife species with a high or moderate potential to occur (Appendix D1) as well as low potential to occur or are not expected to occur (Appendix D2). Dudek's knowledge of expected wildlife use of the project site was determined by known habitat preferences of local species and knowledge of their relative distributions in the area.

All wildlife species detected during the field surveys are identified by sight, calls, tracks, scat, or other sign and are recorded. Binoculars are used to aid in the identification of observed wildlife. Latin and common names of animals would follow Crother (2012) for reptiles and amphibians, American Ornithologists' Society (AOS 2024) for birds, Wilson and Reeder (2005) for mammals, and North American Butterfly Association (NABA 2016) or San Diego Natural History Museum (SDNHM 2002) for butterflies.

Focused coastal California gnatcatcher surveys began in October 2024 and will continue through the spring of 2025.

Per the current protocol established by the USFWS Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol, dated July 28, 1997 (USFWS 1997), Dudek will survey suitable habitat within the project site nine times for the coastal California gnatcatcher. Suitable habitat includes Diegan coastal sage scrub located along the slopes within the Peninsula Study Area and Peninsula Component of the project site, for a total survey acreage of approximately 12.97 acres. A digital map of the site (scale 1 inch = 100 feet) overlain with vegetation polygons is used for the survey. Binoculars are used to aid in detecting and identifying bird species. If found, coastal California gnatcatcher observations would be mapped in the field using the Esri Collector mobile application to record the location and population number as well as activity.

3 Existing Conditions

The Study Area for the Proposed Project is composed of three areas: the Peninsula Component, the Peninsula Study Area, and the University Towers East Component. The Peninsula Study Area consists of the portion of the site presently developed, as well as the parcels immediately surrounding and abutting the Peninsula Component that are owned by SDSU and/or its auxiliaries acting through the State of California. The Peninsula Study Area fully encapsulates the Peninsula Component. The University Towers East Component site consists of the existing parking lot. The Study Area boundaries are shown on Figure 3A, Peninsula Component and Peninsula Study Area Biological Resources, and Figure 3B, University Towers East Component Biological Resources.

The Peninsula Component is broken up into three separate direct impact types: existing developed areas proposed for redevelopment, brush management zone 1, and brush management zone 2. Brush management zone 1 includes a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 includes a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space (see Figure 4A).

Generally, land uses adjacent to the proposed Peninsula Component consist of Chapultepec and Huaxyacac student housing buildings, Remington Road/55th Street, and SDSU sports fields to the south; MTS Trolley, I-8, and residential development to the north; undeveloped canyon land and residential development to the west; and Canyon Crest Drive, SDSU Parking Lot 15 and Logistical Services building, and MTS Trolley to the east. The central portion of this component is comprised of urban/developed areas and ornamental plantings. There are steep slopes composed of native and non-native vegetation along the northern, western, and eastern sides of the urban/developed area. The slope on the western side of the urban/developed area ultimately travels down to the bottom of a canyon where a drainage channel conveys runoff from rainfall and a storm drain. The elevation of this proposed component ranges from approximately 210 feet above mean sea level (amsl) to 450 feet amsl. According to the USDA (2024), there are three soil types found within this component, and descriptions based on the Web Soil Survey (USDA 2024a) appear as follows. Olivenhain cobbly loam, 30% to 50% slopes; Olivenhain–Urban land complex; 2% to 9% slopes; and Olivenhain–Urban land complex, 9% to 30% slopes are mapped within the project boundary. The Olivenhain series is a well-drained soil with slow or medium runoff and very slow permeability (USDA 2024a). These soils are found on gently sloping to strongly sloping hillsides and on marine terraces. Olivenhain soils are generally very cobbly (USDA 2024a). SDSU has conducted periodic brush management on these steep hillsides in past years.

Land uses adjacent to the University Towers East Component consist of Montezuma Road and student housing to the north, 55th Street to the west, and single-family and multi-family residential developments to the south and east. This entire component is comprised of urban/developed areas and ornamental plantings. The elevation of this proposed component is approximately 466 feet amsl. According to the USDA (2024), there are two soil types found within this component, and descriptions based on the Web Soil Survey (USDA 2024a) appear as follows. Olivenhain–Urban land complex, 2% to 9% slopes (description same as above) and Redding-Urban land complex. The Redding series is a well or moderately well drained soil with very low to high runoff and very slow to slow permeability (USDA 2024a).

3.1 Vegetation Communities

Within the Peninsula Component site and Peninsula Study Area, the following vegetation communities were mapped: one native plant community, Diegan coastal sage scrub (predominantly disturbed); four non-native vegetation types including ornamental, eucalyptus woodland, non-native riparian, and disturbed land; and two land cover types, urban/developed and unvegetated channel.

Within the University Towers East Component site, only one land cover type, urban/developed, was mapped.

The acreages of the vegetation communities and land cover types within the Study Area are presented in Table 4.2, and their spatial distributions are presented on Figure 3A, Biological Resources within Peninsula Component and Peninsula Study Area, as well as Figure 3B, Biological Resources within University Towers East Component.

Table 2. Vegetation Communities/Land Cover Types within the Project Components and Study Area

Habitat Types/Vegetation Communities	Oberbauer Code	Acreages within the Proposed Project Site
Non-Native Vegetation Communities/Land Cover Types		
Urban/Developed (DEV)	12000	16.98[1]
Ornamental Plantings (ORN)	12000	3.10
Non-native Riparian (NNR)	65000	0.90
Eucalyptus Woodland (EW)	79100	2.30
Disturbed Habitat (DH)	11300	0.75
Unvegetated Channel (UVC)	12000	0.03
Subtotal	*N/A*	*24.07[2]*
Native Vegetation Communities		
Diegan Coastal Sage Scrub (CSS) (disturbed)	32500	12.97
Subtotal	*N/A*	*12.97*
Total	**N/A**	**37.03[2]**

Notes:
1 Does not include Aztec Circle Drive.
2 Acreages may not sum due to rounding.

Urban/Developed (12000)

Urban/developed refers to areas that have been constructed upon or disturbed so severely that native vegetation is no longer supported. Urban/developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials (Oberbauer et al. 2008). This land cover is not considered a sensitive biological resource by CDFW under CEQA (CDFW 2023). Impacts to these areas do not require mitigation.

Developed land dominates the central portion of the Peninsula Component and encompasses the entire University Towers East Component, totaling 16.98 acres, and includes existing buildings and residences, paved roads, common areas, and parking lots associated with the SDSU student residences.

Ornamental Plantings (12000)

Ornamental plantings are a land cover type that refers to areas where non-native ornamental species and landscaping schemes have been installed and maintained. Ornamental plantings are not considered a sensitive biological resource by CDFW under CEQA (CDFG 2023). Impacts to these areas do not require mitigation.

A total of 3.10 acres of ornamental plantings associated with the landscaping around existing SDSU buildings is mapped in several locations throughout the Peninsula Component as well as the Peninsula Study Area, specifically around the perimeter of the urban/developed areas. This habitat type supports a myriad of ornamental species, including, but not limited to, bank catclaw (*Acacia redolens*), hottentot fig (*Carpobrotus edulis*), jade plant (*Crassula ovata*), Brazilian pepper tree (*Schinus terebinthifolius*), and ornamental pines (*Pinus* spp.).

Non-native Riparian (65000)

Non-native riparian habitat consists of densely vegetated riparian thickets dominated by non-native, invasive species, where non-native, invasive species account for greater than 50% of the total vegetative cover within a mapping unit (Oberbauer et al. 2008). Characteristic species include giant reed (*Arundo donax*), tamarisk (*Tamarix ramosissima*), eucalyptus, palms (*Phoenix* spp. and *Washingtonia* spp.), castor bean (*Ricinus communis*), and pampas grass (*Cortaderia* spp.). The non-native riparian habitat within the site was considered to be a semi-natural stand, and as such was denoted as GNA/SNA, meaning that on a global and state level, a conservation status rank is not applicable because the species or ecosystem is not a suitable target for conservation activities. (CDFW 2023). Per CDFW, non-native riparian is not a sensitive vegetation community regulated by CDFW. In addition, it is outside of the impact area.

A total of 0.90 acres of non-native riparian habitat is present at the bottom of the canyon, in a small strip along the far western edge of the Peninsula Study Area and is dominated by palms (*Phoenix* spp. and *Washingtonia* spp.) and pampas grass (*Cortaderia jubata*). Less than 15% of the riparian species observed were native.

Eucalyptus Woodland (79100)

Although not recognized by Holland (1986) as a native plant community, eucalyptus woodland is a distinct, non-native, naturalized vegetation type that is fairly widespread in southern California and is considered a woodland habitat. It typically consists of monotypic stands of introduced Australian eucalyptus trees (*Eucalyptus* spp.). The understory is either depauperate or absent owing to shade and the possible allelopathic (toxic) properties of the eucalyptus leaf litter. Although eucalyptus woodlands are of limited value to most native plants and animals, they frequently provide nesting and perching sites for several raptor species. Eucalyptus woodland is not considered a sensitive biological resource by CDFW under CEQA (CDFG 2023). Impacts to these areas do not require mitigation.

A total of 2.30 acres of eucalyptus woodland habitat is present within the southeastern corner of the Peninsula Component and Peninsula Study Area, adjacent to the urban/developed areas.

Disturbed Habitat (11300)

Disturbed habitat is a land cover type characterized by a predominance of non-native species, often introduced and established through human action. Oberbauer et al. (2008) describes disturbed land as areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized

vegetation association, but continue to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of non-native plant species such as ornamentals or ruderal exotic species (i.e., weeds). Disturbed habitat is not considered a sensitive biological resource by CDFW under CEQA (CDFG 2023). Impacts to these areas do not require mitigation.

A total of 0.75 acres of disturbed habitat is present along the perimeter of the existing urban/developed areas within the Peninsula Component and Peninsula Study Area. This habitat type supports a variety of ruderal and ornamental species, including, not limited to, hottentot fig, jade plant, Maltese star-thistle (*Centaurea melitensis*), and castor bean.

Unvegetated Channel or Floodway (12000)

According to Oberbauer et al. (2008), non-vegetated channel is the sandy, gravelly, or rocky fringe of waterways or flood channels that is unvegetated on a relatively permanent basis. Vegetation may be present but is usually less than 10% total cover and grows on the outer edge of the channel.

Within the western side of the Peninsula Study Area there is a 0.03-acre non-vegetated channel along the canyon bottom and an erosional feature caused by the City's storm drain outlet that connects into the channel. This land cover is outside of the impact area.

Disturbed Diegan Coastal Sage Scrub (32500)

According to Holland (1986), Diegan coastal sage scrub is composed of a variety of soft, low shrubs, characteristically dominated by drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.), with scattered evergreen shrubs, including lemonadeberry (*Rhus integrifolia*), and laurel sumac (*Malosma laurina)*. It typically develops on xeric (dry) slopes.

Virtually all of the Diegan coastal sage scrub vegetation within the study area is disturbed and located within the Peninsula Study Area. There is also a small amount of disturbed Diegan coastal sage scrub within the Peninsula Component. The disturbed Diegan coastal sage scrub totals 12.97 acres and is dominated by California sagebrush, California buckwheat, Menzies's golden bush (*Isocoma menziesii*), coyote brush (*Baccharis pilularis*), lemonadeberry, and laurel sumac, with approximately 25% cover of non-native *Acacia* species, compact brome (*Bromus madritensis*), and Smilo grass (*Stipa Miliacea*) growing throughout and along the edges.

Diegan coastal sage scrub has a global rank of G4 and state rank of S4, meaning it is not considered sensitive by the state (CDFW 2023). However, impacts to these areas would require mitigation since they may provide suitable coastal California gnatcatcher habitat.

3.2 Floral Diversity

A total of 38 species of native or naturalized plants, 16 native (42%) and 22 non-native (58%), have been recorded within the Peninsula Study Area, Peninsula Component, and University Towers East Component thus far (see Appendix A). Focused rare plant surveys will be conducted during the spring and summer of 2025. Once complete, the appendix will be updated if additional species are detected.

3.3 Wildlife Diversity

The Peninsula Study Area and Peninsula Component sites support habitat for both common upland and some special-status species. A list of the wildlife species detected within the project site thus far is provided in Appendix B. To date, there have been 29 species observed. Common bird species detected thus far include mourning dove (*Zenaida macroura*), California scrub-jay (*Aphelocoma californica*), bushtit (*Psaltriparus minimus*), and American crow (*Corvus brachyrhynchos*). Scrub and ornamental habitats within the project site provide foraging and nesting habitat for migratory and resident bird species and other wildlife species.

Special-status wildlife species are addressed in Section 3.5.

As previously noted, focused coastal California gnatcatcher surveys commenced in October of 2024. Once complete, Appendix B would be updated if coastal California gnatcatcher are detected.

3.4 Special-Status Plant Species

Endangered, rare, or threatened plant species, as defined in CEQA Guidelines Section 15380(b) (14 CCR 15000 et seq.), are referred to as "special-status plant species" in this report and include (1) endangered or threatened plant species recognized in the context of the California Endangered Species Act (CESA) and the federal Endangered Species Act (FESA) (CNDDB 2024a), and (2) plant species with a CRPR 1 through 3 (CNPS 2024). This report also acknowledges CRPR 4 plant species as special-status.

Special-status plant surveys are planned to be conducted within the project site in the spring and summer of 2025 to determine the presence or absence of plant species that are considered endangered, rare, or threatened under CEQA Guidelines Section 15380 (14 CCR 15000 et seq.).

Based on the initial review described in Section 2, a number of special-status plant species have a moderate potential to occur and are presented in Appendix C1. San Diego goldenstar (*Bloomeria clevelandii;* CRPR 1B.1) has a high potential to occur due to the fact that it was documented during surveys conducted for the 2017 SDSU New Student Housing Project (Dudek 2017), which overlaps a portion of the SDSU Evolve Student Housing Project Peninsula Study Area. Other special-status plant species with a high potential to occur due to recent documented occurrences in the immediate vicinity as well as the presence of suitable habitat include small-flowered morning-glory (*Convolvulus simulans;* CRPR 4.2), San Diego barrel cactus (*Ferocactus viridescens;* CRPR 2B.1), and ashy spike-moss (*Selaginella cinerascens;* CRPR 4.1).

Special-status plant species known to occur in the surrounding region but are not expected to occur or with low potential to occur on site are also included in Appendix C2. These appendices would be updated as necessary pending the results of the focused rare plant surveys.

Special-status plant surveys are planned to be conducted in the spring (April) and summer (June) of 2025, which coincides with the blooming periods for the majority of the annual species; therefore, the target species should be detected if they occur on site. These surveys will determine the presence or absence of plant species that are considered endangered, rare, or threatened under CEQA Guidelines Section 15380 (14 CCR 15000 et seq.). Until surveys are completed, any species with a potential to occur on site would be assumed to be present within suitable habitat and potential impacts would be mitigated accordingly.

Critical Habitat

There is no USFWS-designated critical habitat mapped for plant species within the project site or within a 1-mile vicinity. There is USFWS-designated critical habitat for two species located within 5 miles of the project site: San Diego ambrosia (*Ambrosia pumila)* and spreading navarretia (*Navarretia fossalis*) (USFWS 2024a). There is a moderate potential for San Diego ambrosia to occur within the suitable coastal sage scrub habitat within the Peninsula Study Area and Peninsula Component. However, spreading navarretia (*Navarretia fossalis*) is not expected to occur as there is no suitable marsh or swamp habitat present.

3.5 Sensitive Wildlife Species

Endangered, rare, or threatened wildlife species, as defined in CEQA Guidelines Section 15380(b) (14 CCR 15000 et seq.), are referred to as "special-status wildlife species" and, as used in this report, include (1) endangered or threatened wildlife species recognized in the context of CESA and FESA (CNDDB 2023b); (2) California Species of Special Concern (SSC) and Watch List species, as designated by the CDFW (CNDDB 2023c); (3) mammals and birds that are fully protected species, as described in the California Fish and Game Code, Sections 4700 and 3511; and (4) Birds of Conservation Concern, as designated by the USFWS (USFWS 2008).

Special-status wildlife species that have a high or moderate potential to occur are presented in Appendix D1. Special-status wildlife species known to occur in the surrounding region or have low potential to occur on site are presented in Appendix D2. For each species listed, Dudek determined whether the species has the potential to occur on site based on information gathered during the literature review, including the location of the project site, vegetation communities or land covers present, current site conditions, and past and present land use. These appendices would be updated as necessary pending the results of focused surveys currently in progress.

Critical Habitat

There is no USFWS-designated critical habitat mapped within the project site. However, there is USFWS-designated critical habitat for two species located within 5 miles of the project site: coastal California gnatcatcher and least Bell's vireo (*Vireo bellii pusillus*) (USFWS 2024). There is a high potential for coastal California gnatcatcher to occur within the suitable coastal sage scrub habitat within the Peninsula Study Area and Peninsula Component. However, least Bell's vireo are not expected to occur as the non-native riparian is highly disturbed, fragmented from other riparian habitat, and relatively small in expanse.

Species with a Moderate or High Potential to Occur On Site

Special-Status Amphibians and Reptiles

San Diego Tiger Whiptail Lizard (*Aspidoscelis tigris stejnegeri*)

San Diego tiger whiptail lizard is a CDFW SSC and has moderate potential to occur on site. It is found in coastal Southern California, mostly west of the Peninsular Ranges and south of the Transverse Ranges, north into Ventura County, and south into Baja California, Mexico (Stebbins 2003).

The San Diego tiger whiptail is found in a variety of habitats, primarily in areas where plants are sparse and there are open areas for running. According to Stebbins (2003), the species ranges from deserts to mountain pine forests

where it prefers warmer and drier areas. The species is also found in woodland and streamside growth, and it avoids dense grassland and thick shrub growth. There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Northern Red-Diamond Rattlesnake (*Crotalus ruber ruber*)

The northern red-diamond rattlesnake is a CDFW SSC and has moderate potential to occur on site. It is found in a variety of habitats from the coast to the deserts, from San Bernardino County into Baja California, Mexico (below 5,000 feet in elevation). It commonly occurs in rocky areas within coastal sage scrub, chaparral, juniper woodlands, and desert habitats, but can also be found in areas devoid of rocks (Lemm 2006). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Blainville's Horned Lizard (*Phrynosoma blainvillii*)

Blainville's horned lizard (previously coast horned lizard) is a CDFW SSC and has moderate potential to occur on site. It is found from the Sierra Nevada foothills and central California to coastal Southern California. It is often associated with coastal sage scrub, especially areas of level to gently sloping ground with well-drained loose or sandy soil, but it can also be found in annual grasslands, chaparral, oak woodland, riparian woodland, and coniferous forest between 30 feet and 7,030 feet amsl (Jennings and Hayes 1994). This reptile typically avoids dense vegetation, preferring 20% to 40% bare ground in its habitat. The Blainville's horned lizard can be locally abundant in areas where it occurs, with densities near 20 adults per acre. Adults are active from late March through late August, and young are active from August through November or December. Up to 90% of the diet of the Blainville's horned lizard consists of native harvester ants (*Pogonomyrmex* spp.). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Coast Patch-Nosed Snake (*Salvadora hexalepis virgultea*)

The coast patch-nosed snake is a CDFW SSC and has moderate potential to occur on site. It ranges from west-central Nevada south to the tip of Baja California and northwestern Sonora, and from coastal Southern California to southwestern Utah and central Arizona. The coast patch-nosed snake is found at elevations from below sea level to around 2,130 meters (6,988 feet) amsl (Goldberg 1995).

The coast patch-nosed snake is diurnal (Stebbins 2003) and can be found throughout the day during the milder months of spring. Activity is restricted to the mornings and late afternoons during the summer months. As an active, diurnal snake, it will occasionally take refuge in rock crevices, in small mammal burrows, and under vegetation. May and June are the typical months of peak activity; however, in the southern part of its range, activity may extend all year during mild to warm weather. The subspecies is a broad generalist in its diet and an opportunistic feeder that probably preys on anything it can overpower including small mammals (*Dipodomys*), lizards (*Aspidoscelis*, *Coleonyx*), and the eggs of lizards and snakes (Stebbins 2003). Jennings and Hayes (1994) also found that the patch-nosed snake may adjust its activities around that of one of its prey: the whiptail lizard (*Aspidoscelis* spp.). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Special-Status Birds

Coastal California Gnatcatcher (Polioptila californica californica)

The coastal California gnatcatcher is a federally listed threatened species and a CDFW SSC and has a high potential to occur on site. It is closely associated with coastal sage scrub habitat and typically occurs below elevations of 950 feet amsl and on slopes less than 40%, but gnatcatchers have been observed at elevations greater than 2,000 feet amsl (Zeiner et al. 1990). The species is threatened primarily by loss, degradation, and fragmentation of coastal sage scrub habitat; it is also impacted by brown-headed cowbird (*Molothrus ater*) nest parasitism.

Focused surveys for this species are being conducted through year end 2024 into early 2025 within all potentially suitable gnatcatcher habitat (coastal sage scrub) in the Study Area.

While coastal California gnatcatcher were not detected in the 2017 surveys conducted in support of the adjacent SDSU New Student Housing Project (Dudek 2017), this species has potential to occur in the coastal sage scrub and the surveys that would be conducted in 2024 and 2025 would provide current information on the species' presence/absence. Potential impacts to coastal California gnatcatchers due to project implementation are discussed in the impacts analysis.

Special-Status Mammals

No special-status mammals have a high or moderate potential to occur or have been observed in the Study Area.

Special-Status Amphibians

No special-status amphibians are anticipated to occur within the Study Area. There is a lack of suitable habitat such as pools for breeding and stream terraces for foraging and wintering. Additionally, the drainages in the Study Area are fed by urban runoff and predominantly covered in thick non-native vegetation. The Study Area is located within an urbanized setting and there is likely a strong presence of urban-adapted predators. No special-status amphibians have been observed in the Study Area.

Special-Status Invertebrates

Crotch's bumble bee (*Bombus crotchii*) is a candidate to become a state endangered species. This species is known to occur almost exclusively in California and has historically occupied grasslands and shrublands in southern to central California (CDFW 2019). Suitable habitat for this species may include (1) areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows and forage plants; (2) potential nest habitat (late February through late October) containing underground abandoned small mammal burrows, perennial bunch grasses, and/or thatched annual grasses, brush piles, old bird nests, dead trees, or hollow logs (Williams et al. 2014; Hatfield et al. 2015); and (3) overwintering sites (November through early February). The Peninsula Study Area and Peninsula Component may have the potential to support foraging and nesting for this species.

Crotch's bumble bee has a moderate potential to occur within the coastal sage scrub communities on site where floral resources are present. There are several records of Crotch's bumble bee within 5 miles of the site, including one from 2019 located approximately 4 miles west of the site along the northern side of the San Diego River (CDFW 2024a).

3.6 Jurisdictional Waters of the U.S./Wetland Resources

Based on the jurisdictional delineation conducted in 2017 for the SDSU New Student Housing project (Dudek 2017), one drainage within the Peninsula Study Area was identified as jurisdictional under USACE and RWQCB. Approximately 728 linear feet of non-wetland waters (ephemeral stream channels) under the jurisdiction of USACE and RWQCB are found within the far west side of the Peninsula Study Area. This drainage connects downstream with the San Diego River and, eventually, the Pacific Ocean.

3.7 Habitat Connectivity and Wildlife Corridors

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping-stones for wildlife dispersal. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of wildlife from high-density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife corridors are considered sensitive by resource and conservation agencies.

The project site vicinity includes a variety of existing residential and urban developments, as well as buildings and facilities associated with SDSU. Two baseball diamonds, tennis courts, and other various sports fields are present to the south and west. To the north is the MTS Trolley, I-8, as well as high density housing. Located to the east and south are large, multilevel parking structures and Viejas Arena, a popular open air concert venue. Cumulatively, these developments and facilities contribute to the fragmentation and human disturbance of the surrounding area. Although much of the project site is located along a mesa adjacent to a north-trending canyon that feeds into Alvarado Canyon, the lower terraces of the canyon are constrained by existing development, principally I-8 and existing residential development north of I-8. However, there are other canyons located within the Alvarado Canyon system that are peripherally connected to the project site. Due to the nearby residential areas, I-8, and SDSU campus, wildlife that move through the north-trending canyon is largely limited to urban-adapted wildlife species such as brush rabbit, coyote, bobcat, lizards and snakes, and a variety of bird species and invertebrates. Thus, the site supports a linkage function within the canyon but would not be considered a wildlife corridor because it is cut off from connection to southern portions of the county and would have more of a cul-de-sac function of habitat for species that are tolerant of the urban interface.

The University Towers East Component site is urban/developed and surrounded by land that is urban/developed and does not contain habitat connectivity and wildlife corridors.

Canyonlands in San Diego are largely the only habitat corridors within urbanized areas of San Diego. The largest open space areas within the vicinity of the project site are Mission Trails Regional Park, located 3.3 miles northeast of the project site; Marine Corps Air Station Miramar, located 4.5 miles north of the project site; and Otay Mesa, located 6.7 miles southeast.

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4 Regulatory Setting

This section describes the regulatory plans, policies, and ordinances applicable to analysis of the proposed project.

4.1 Federal

Federal Endangered Species Act

The FESA of 1973 (16 USC 1531 et seq.), as amended, is administered by the USFWS, National Oceanic and Atmospheric Administration, and National Marine Fisheries Service. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing extinction of plants and wildlife. Under provisions of Section 9(a)(1)(B) of FESA, it is unlawful to "take" any listed species. "Take" is defined in Section 3(19) of FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

FESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans (HCPs) on private property without any other federal agency involvement. Upon development of an HCP, USFWS can issue incidental take permits for listed species.

FESA provides for designation of Critical Habitat, defined in Section 3(5)(A) as specific areas within the geographical range occupied by a species where physical or biological features "essential to the conservation of the species" are found and "which may require special management considerations or protection." Critical Habitat may also include areas outside the current geographical area occupied by the species that are nonetheless "essential for the conservation of the species."

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). The MBTA was updated in 2004 with the Migratory Bird Treaty Reform Act of 2004, which amended the MBTA to apply only to migratory bird species that are "native to the United States or U.S. territories, and that a native migratory bird species is one that is present as a result of natural biological or ecological processes." A list of non-native, human-introduced species that are not covered by the MBTA was published in 2020. On January 7, 2021, the USFWS published a final rule, effective December 3, 2021, defining the scope of the MBTA to prohibit incidental take and applying enforcement discretion, consistent with judicial precedent and longstanding agency practice (USFWS 2021). Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). The Executive Order requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect these species.

Clean Water Act (Section 404)

The Clean Water Act (CWA) is the major federal legislation governing water quality, providing guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 of the CWA requires an applicant for a federal license or permit that may result in a discharge of pollutants into waters of the United States to obtain state certification, thereby ensuring that the discharge would comply with provisions of the CWA. The State Water Resources Control Board and RWQCBs administer the Section 401 Certification program in California. Section 402 of the CWA establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. USACE implementing regulations are found in 33 Code of Federal Regulations (CFR) Parts 320 to 332. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency (EPA) in conjunction with USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic ecosystem only if there is no practicable alternative that would have less-adverse impacts.

Wetlands and Other Waters of the United States

The definition of waters of the United States establishes the geographic scope of authority under Section 404 of the CWA; however, the CWA does not specifically define waters of the United States, leaving the definition open to statutory interpretation and agency rulemaking. The definition of what constitutes "waters of the United States" (provided in 33 CFR Section 328.3(a)) has changed multiple times over the past few decades, starting with the *United States v. Riverside Bayview Homes Inc*. court ruling in 1985. Subsequent court proceedings, rule makings, and congressional acts in 2001 (*Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers*), 2006 (*Rapanos v. United States*), 2015 (Clean Water Rule), 2018 (suspension of the Clean Water Rule), 2019 (formal repeal of the Clean Water Rule), 2020 (Navigable Waters Protection Rule), and 2021 (*Pasqua Tribe et al v. United States Environmental Protection Agency* resulting in remand and vacatur of the Navigable Waters Protection Rule and a return to "the pre-2015 regulatory regime") have attempted to provide greater clarity to the term and its regulatory implementation. On December 30, 2022, the agencies announced the final Revised Definition of "Waters of the United States" rule (Rule) (88 CFR 3004–3144). The Rule was published in the Federal Register on January 18, 2023, and became effective on March 20, 2023, restoring federal jurisdiction over waters that were protected prior to 2015 under the CWA for traditional navigable waters, the territorial seas, interstate waters, and upstream water resources that significantly affect those waters. The Rule represents a re-expansion of federal jurisdiction over certain water bodies and wetlands previously exempt pursuant to the 2020 Navigable Waters Protection Rule. The Rule also considers various subsequent court decisions, including two notable Supreme Court decisions.

There are two key changes that the Rule incorporates. First, the Rule reinstates the "Significant Nexus" test. The Significant Nexus test refers to waters that either alone, or in combination with similarly situated waters in the region, significantly affect the chemical, physical, or biological integrity of traditional navigable waters, interstate waters, or the territorial seas (86 FR 69372-69450). The Significant Nexus test attempts to establish a scientific connection between smaller water bodies, such as ephemeral or intermittent tributaries, and larger, more traditional navigable waters such as rivers. Significant Nexus evaluations take into consideration hydrologic and ecologic factors including, but not limited to, volume, duration, and frequency of surface water flow in the resource and its proximity to a traditional navigable water, and the functions performed by the resource on adjacent wetlands.

Second, the Rule adopts the "Relatively Permanent Standard" test. To meet the Relatively Permanent Standard, water bodies must be relatively permanent, standing, or continuously flowing and have a continuous surface connection to such waters.

On May 25, 2023, the Supreme Court issued its long-anticipated decision in *Sackett v. United States Environmental Protection Agency*, in which it rejected the EPA's claim that "waters of the United States," as defined in the CWA, includes wetlands with an ecologically Significant Nexus to traditional navigable waters. The Supreme Court held that only those wetlands with a continuous surface water connection to traditional navigable waterways would be afforded federal protection under the CWA. Specifically, to assert jurisdiction over an adjacent wetland under the CWA, a party must establish that (1) the adjacent body of water constitutes water[s] of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters), and (2) the wetland has a continuous surface connection with that water, making it difficult to determine where the water ends and the wetland begins. On August 29, 2023, the EPA and USACE announced the final rule amending the 2023 definition of "waters of the United States", conforming with the *Sackett v. United States Environmental Protection Agency* decision. Some of the key changes include removing the Significant Nexus test from consideration when identifying tributaries and other waters as federally protected and revising the adjacency test when identifying federally jurisdictional wetlands. Under the EPA's new "waters of the United States" definition, a "waters of the United States" is a relatively permanent, standing, or continuously flowing body of water that has an apparent surface connection to a "traditionally navigable water" to fall within federal purview. The new rule applies to wetlands and streams throughout the United States. Although the Sackett opinion did not specifically reference streams, the EPA's new rule extends the "continuous surface connection" standard to streams, thereby removing non-permanent, ephemeral streams that do not meet these standards from federal jurisdiction.

The term "wetlands" (a subset of waters of the United States) is defined in 33 CFR, Section 328.3(c)(16), as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark," which is defined in 33 CFR 328.3(c)(7) as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

4.2 State

California Endangered Species Act

CDFW administers CESA (California Fish and Game Code, Section 2050 et seq.), which prohibits the "take" of plant and animal species designated by the Fish and Game Commission as endangered or threatened in the State of California. Under CESA Section 86, take is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA Section 2053 provides that state agencies may not approve projects that would "jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy."

CESA Sections 2080 through 2085 address the taking of threatened, endangered, or candidate species by stating:

> No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided in this chapter, the Native Plant Protection Act (Fish and Game Code, Sections 1900–1913), or the California Desert Native Plants Act (Food and Agricultural Code, Section 80001).

California Fish and Game Code

According to Sections 3511 and 4700 of the Fish and Game Code, which regulate birds and mammals, respectively, a "fully protected" species may not be taken or possessed without a permit from the Fish and Game Commission, and "incidental takes" of these species are not authorized.

According to Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Finally, Section 3513 states that is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

For the purposes of these state regulations, CDFW currently defines an active nest as one that is under construction or in use and includes existing nests that are being modified. For example, if a hawk is adding to or maintaining an existing stick nest in a transmission tower, then it would be considered to be active and covered under these Fish and Game Code sections.

Pursuant to Section 1602 of the Fish and Game Code, the 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 Streambed Alteration Agreement is required for impacts to jurisdictional wetlands in accordance with Section 1602 of the California Fish and Game Code.

Porter–Cologne Water Quality Control Act

The intent of the Porter–Cologne Water Quality Control Act is to protect water quality and the beneficial uses of water, and it applies to both surface water and groundwater. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under the Porter–Cologne Water Quality Control Act include isolated waters that are no longer regulated by the USACE. Developments with impact to jurisdictional waters must demonstrate compliance with the goals of the act by developing storm water pollution prevention plans, standard urban stormwater mitigation plans, and other measures to obtain a CWA Section 401 certification or waste discharge requirements.

California Environmental Quality Act

CEQA requires identification of a project's potentially significant impacts on biological resources and feasible mitigation measures (MMs) and alternatives that could avoid or reduce significant impacts. CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors" (14 CCR 15000 et seq.). A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c). CEQA also requires identification of a project's potentially significant impacts on riparian habitats (such as wetlands, bays, estuaries, and marshes) and other sensitive natural communities, including habitats occupied by endangered, rare, and threatened species.

4.3 Regional

Natural Community Conservation Plan

Section 2835 of the Fish and Game Code allows CDFW to authorize incidental take in a natural community conservation plan (NCCP). Take may be authorized for identified species whose conservation and management is provided for in the NCCP, whether or not the species is listed as threatened or endangered under FESA or CESA, provided that the NCCP complies with the conditions established in Section 2081 of the Fish and Game Code. The NCCP provides the framework for the San Diego Multiple Species Conservation Program (MSCP) Plans (see the following discussion).

Multiple Species Conservation Program

The MSCP is a comprehensive regional long-term habitat conservation program. The MSCP addresses habitat and species conservation within approximately 900 square miles in the southwestern portion of San Diego County (County of San Diego 1998). It serves as an approved HCP pursuant to FESA and an approved NCCP in accordance with the state Natural Communities Conservation Planning Act (County of San Diego 1998).

The MSCP establishes a preserve system designed to conserve large blocks of interconnected habitat having high biological value, which are delineated as the MHPA. The City's MHPA is an area within which a "hard line" preserve would be established in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997).

The MSCP identifies 85 plants and animals to be "covered" under the plan ("Covered Species"). Many of these Covered Species are subject to one or more protective designations under state and/or federal law, and some are endemic to San Diego. The MSCP was designed to provide adequate habitat in the preserve to maintain ecosystem functions and persistence of extant populations of the 85 Covered Species, while also allowing participating

landowners' "take" of Covered Species on lands located outside of the preserve. The purpose of the MSCP is to address species conservation on a regional level and thereby avoid project-by-project biological mitigation, which tends to fragment habitat.

Signatory agencies/districts administer their portions of the MSCP through subarea plans and implementing agreements. Within the City, the MSCP is implemented through the City of San Diego MSCP Subarea Plan (Subarea Plan) and Implementing Agreements (City of San Diego 1997), as well as referenced companion documents, including the Environmentally Sensitive Lands Regulations of the Land Development Code and San Diego Biology Guidelines of the Land Development Manual. The MSCP Subarea Plan establishes a preserve system designed to conserve large blocks of interconnected habitat having high biological value, which are delineated in the MHPA.

As the CSU/SDSU is a state entity, the CSU/SDSU is not subject to local land use regulations, nor is it a signatory to the MSCP; therefore, it is not subject to the implementing agreements or related regulations, including, but not limited to, Environmentally Sensitive Lands Regulations or San Diego Biology Guidelines.

5 Thresholds of Significance

The criteria used to evaluate the Proposed Project's potential impacts to biological resources are based on Appendix G of the CEQA Guidelines. Based on these criteria, the Proposed Project would result in a significant impact related to biological resources if the Project would:

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 the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
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.
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. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
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.
7. Result in a cumulative impact when considered with other present and probable future projects in the region.

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6 Impact Analysis

6.1 Threshold 1

Would the project 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 the California Department of Fish and Game or U.S. Fish and Wildlife Service?

6.1.1 Direct Impacts

The Peninsula Component is broken up into three separate direct impact types: existing developed areas proposed for redevelopment, brush management zone 1, and brush management zone 2.

Within the Peninsula Component, 0.55 acres of native Diegan coastal sage scrub (disturbed) are located within brush management zone 2 and would be directly impacted by Project development. Within brush management zone 1, three non-native vegetation communities (ornamental plantings, eucalyptus woodland, and disturbed habitat) would be directly impacted. Most of the existing urban/developed land cover within the Peninsula Component would be redeveloped and, therefore, directly impacted by Project development (Figure 4A, Proposed Impacts to Peninsula Component and Peninsula Study Area Biological Resources). Therefore, the Proposed Project would result in direct impacts to the Peninsula Component site.

The University Towers East Component direct impacts would only include the redevelopment of existing urban/developed land cover (Figure 4B, Proposed Impacts to University Towers East Component Biological Resources). There are no brush management zones proposed within this site. Therefore, redevelopment of the University Towers East Component site would not 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. As such, **no impacts** would occur related to the University Towers East component.

Table 3 lists the impacts to each vegetation community or land cover type by impact type. As shown on the table, a total of 0.55 acres of Diegan coastal sage scrub, a native vegetation community, would be directly impacted by development of the Proposed Project.

Table 3. Impacts to Vegetation Communities/Land Cover Types

Vegetation Communities/Land Cover Types	Direct Impacts				
	Peninsula Component			University Towers East Component	
	Peninsula Redevelopment Area	Peninsula Brush Management Zone 1	Peninsula Brush Management Zone 2	University Towers East Redevelopment Area	Direct Impact Totals
Native Vegetation Communities					
Diegan Coastal Sage Scrub (CSS) (disturbed)	0	0	0.55	0	***0.55***
Subtotal	*0*	*0*	*0.55*	*0*	***0.55***
Non-Native Vegetation Communities/Land Cover Types					
Urban/Developed (DEV)	6.79	3.45	0.24	1.30	***11.77***
Ornamental Plantings (ORN)	0	0.06	0.53	0	***0.59***
Non-native Riparian (NNR)	0	0	0	0	***0***
Eucalyptus Woodland (EUC)	0.04	0.22	0.73		***0.99***
Disturbed Habitat (DH)	0	0.02	0.34	0	***0.36***
Unvegetated Channel	0	0	0	0	***0***
Subtotal	*6.83*	*3.75*	*1.84*	*1.30*	***13.71[1]***
Total	**6.83[1]**	**3.75[1]**	**2.39[1]**	**1.30[1]**	**14.27[1]**

Note:
[1] May not sum due to rounding.

Impacts to the Peninsula Component redevelopment area and brush management zone 1, as well as impacts to the redevelopment area within the University Towers East Component, would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. These impacted non-native vegetation types are not protected, and special-status plants or special-status wildlife are not expected to occur within these areas. Therefore, no direct impacts from the Proposed Project would occur within the University Towers East Component, Peninsula Component existing developed area, or Peninsula Component brush management Zone 1. Direct impacts of note would be limited to 0.55 acres of Diegan coastal sage scrub located in Peninsula Component brush management zone 2, which serves as potential habitat for several special-status species.

The discussion below analyzes the effect (i.e., potential significance) of the Proposed Project's direct impacts within the Peninsula Component on any species identified as a candidate, sensitive, or special-status species

Special-Status Plants

There are a number of special-status plants that have a moderate or high potential to occur within the Peninsula Component. These are listed in Appendix C1. A spring survey and summer survey for special status plants will be conducted in April and June 2025. Until the surveys are completed, it will be assumed these species are present within areas of suitable habitat (i.e., coastal sage scrub).

Therefore, impacts to the 0.55 acres of disturbed Diegan coastal sage scrub as a result of the brush management within zone 2 of the Peninsula Component would result in significant impacts to special-status plants if they were determined to be present. Therefore, potential direct impacts to special-status plants would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Impacts to the redevelopment area as well as brush management zone 1 within the Peninsula Component, as well as to the redevelopment area within the University Towers East Component, would result in impacts to existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. However, these impacted non-native vegetation types are not protected and special-status plants are not expected to occur within these areas, therefore, impacts to these areas would not have a substantially adverse effect on special-status plants and impacts are not expected to occur.

Special-Status Birds

Coastal California gnatcatcher has high potential to occur in the disturbed Diegan coastal sage scrub present on the Peninsula Component site. Surveys for this species began in October 2024 and are slated to continue through 2025. Coastal California gnatcatcher is a federally listed threatened species and a CDFW SSC.

Impacts to the 0.55 acres of disturbed Diegan coastal sage scrub due to the brush management within zone 2 of the Peninsula Component would result in significant impacts to coastal California gnatcatcher if they were determined to be present. Therefore, potential direct impacts to coastal California gnatcatcher would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation) and **MM-BIO-2** (coastal California gnatcatcher surveys).

Impacts to the redevelopment area as well as brush management zone 1 within the Peninsula Component, as well as to the redevelopment area within the University Towers East Component, would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. However, no coastal California gnatcatcher, or other special-status birds, are not expected to occur within these areas. Therefore, impacts to these areas would not have a substantially adverse effect on special-status birds and would not be a significant impact.

Special-Status Reptiles

San Diegan tiger whiptail, northern red-diamond rattlesnake, Blainville's horned lizard, and coast patch-nosed snake have moderate potential to occur in the coastal sage scrub on the Peninsula Component site. These species are not federally or state listed as threatened or endangered but are CDFW-designated Watch List species or SSCs and/or covered species under the City's Subarea Plan.

Impacts to the 0.55 acres of disturbed Diegan coastal sage scrub due to the brush management within zone 2 would result in impacts to special-status reptiles if they were determined to be present. Therefore, direct impacts to special-status reptiles would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Impacts to the redevelopment area as well as brush management zone 1 within the Peninsula Component, as well as to the redevelopment area within the University Towers East Component, would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. However, no special-status reptiles are expected to occur within these areas. Therefore, impacts to these areas would not have a substantially adverse effect on special-status reptiles and would not be a significant impact.

Special-Status Mammals

Four species of bats including pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), western red bat (*Lasiurus frantzii*), and western yellow bat (*Lasiurus xanthinus*) have a low potential to forage (see Appendix D2) within brush management zone 2 of the Peninsula Component. These species are not federally or state listed as threatened or endangered, but are CDFW SSCs. These species could forage within the coastal sage scrub habitat, although it is unlikely that they would roost due to the high disturbance in the area and the lack of suitable resources. Therefore, impacts to these areas would not have a substantially adverse effect on special-status mammals, and direct impacts to special-status mammals would be **less than significant**.

Impacts to the redevelopment area as well as brush management zone 1 within the Peninsula Component, as well as the redevelopment area within the University Towers East Component would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. However, no special-status mammals are expected to occur within these areas. Therefore, impacts to these areas would not have a substantially adverse effect on special-status mammals and would not be a significant impact.

Special-Status Amphibians

No special-status amphibians have potential to occur (see Appendix D2) as there is no suitable habitat (breeding pools, stream terraces, etc.) within or in the immediate vicinity of the Peninsula Component or University Towers East Component. Additionally, the drainages on the site are fed by urban runoff and predominantly covered in thick non-native vegetation that would preclude special-status amphibians from occurring. Therefore, no special-status amphibians would be impacted as a result of impacts to the Peninsula Component as well as the University Towers East Component. **No impacts** would occur.

Special-Status Invertebrates

There is a moderate potential for Crotch's bumble bee to occur where floral resources are present, primarily in the coastal sage scrub as it is the most suitable habitat within the Peninsula Study Area (see Appendix D1). This species is a candidate to become a state endangered species.

Impacts to the 0.55 acres of potentially occupied disturbed Diegan coastal sage scrub habitat due to the brush management within zone 2 of the Peninsula Component would result in impacts to special-status invertebrates if they were determined to be present. Therefore, direct impacts to special-status invertebrates would be potentially

significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Impacts to the redevelopment area as well as brush management zone 1 within the Peninsula Component, as well as to the redevelopment area within the University Towers East Component would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. However, no special-status invertebrates are expected to occur within these areas. Therefore, impacts to these areas would not have a substantially adverse effect on special-status invertebrates and would not result in a significant impact.

Birds Protected Under the MBTA

If construction activities associated with the Proposed Project and associated brush management were to occur during the bird nesting season (typically January 15 through September 15), impacts to migratory birds or destruction of active migratory bird nests and/or eggs would be considered a significant impact because they are protected under the MBTA. Because it is reasonable to assume that construction activities would occur between January 15 and September 15, direct impacts to migratory birds would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-3** (nesting bird surveys).

Other Species

No special-status fish have potential to occur (see Appendix D2) as no bodies of water (lakes, streams, creeks, etc.) are within or in the immediate vicinity of the project site. **No impacts** to special-status fish would occur.

6.1.2 Indirect Impacts

The University Towers East Component consists of urban/developed land and is surrounded by land that is urban/developed. There are no brush management zones proposed within this component. No potential indirect impacts 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 are anticipated at the University Towers East Component site. **No indirect impact** would occur.

The discussion below analyzes the indirect impacts within the Peninsula Component to any species identified as a candidate, sensitive, or special-status species.

Short-Term Indirect Impacts to Special-Status Plants

Potential short-term or temporary indirect impacts to special-status plants adjacent to the Project site would primarily result from construction activities and include impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides). Potential short-term indirect impacts associated with the Proposed Project could affect the special-status plants if they occur adjacent to the Peninsula Component as described in detail below.

Generation of Fugitive Dust. Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases.

Changes in Hydrology. Construction could result in hydrologic and water-quality-related impacts adjacent to and downstream of the limits of grading. Hydrologic alterations include changes in flow rates and patterns in drainages, which may affect adjacent and downstream (off-site) aquatic, wetland, and riparian vegetation communities. Water-quality impacts include chemical-compound pollution (brush, oil, lubricants, paints, release agents, and other construction materials), erosion, and excessive sedimentation. The removal of existing vegetation can increase runoff from roads and other paved surfaces, resulting in increased erosion and transport of surface matter into vegetation communities. Altered erosion, increased surface flows, and underground seepage can allow for the establishment of non-native plants. Changed hydrologic conditions can also alter seed bank characteristics and modify habitat for ground-dwelling fauna that may disperse seed.

Chemical Pollutants. Erosion and chemical pollution (releases of brush, oil, lubricants, paints, release agents, and other construction materials) may affect special-status plants. The use of chemical pollutants can decrease the number of plant pollinators, increase the existence of non-native plants, and cause damage to and destruction of native plants.

Short-term indirect impacts to special-status plants associated with generation of fugitive dust, changes in hydrology, and chemical pollutants within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-4 (construction monitoring and reporting).

No potential short-term indirect impacts to special-status plants are anticipated within the University Towers East Component of the proposed project.

Long-Term Indirect Impacts to Special-Status Plants

Long-term (operation-related) or permanent indirect impacts could result from the proximity of the proposed project to special-status plants adjacent to the project site after construction. Permanent indirect impacts that could affect special-status plants include generation of fugitive dust, habitat fragmentation, chemical pollutants, altered hydrology, non-native invasive species, increased human activity, and alteration of the natural fire regime. Each of these potential indirect impacts is discussed as follows.

Generation of Fugitive Dust. See prior discussion above regarding the effects of fugitive dust on special-status plants.

Chemical Pollutants. The effects of chemical pollutants on special-status plant species are described above. During landscaping activities, herbicides may be used to prevent certain types of vegetation from reoccurring around structures. However, weed control treatments shall include only legally permitted chemical, manual, and mechanical methods. Additionally, any herbicides used during landscaping activities would be contained within the project impact footprint.

Altered Hydrology. Water would be used for landscaping purposes that may alter the on-site hydrologic regime. These hydrologic alterations may affect special-status plant communities. Altered hydrology can allow for the establishment of non-native plants and invasion by Argentine ants (*Linepithema humile*), which can compete with native ant species that could be seed dispersers or plant pollinators. However, the water, and associated runoff, used during landscaping activities would be contained within the project impact footprint, and long-term indirect impacts associated with altered hydrology are not expected.

Non-native, Invasive Plant and Animal Species. Invasive plant species that thrive in edge habitats are a well-documented problem in Southern California and throughout the United States. Bossard et al. (2000) list several adverse effects of non-native species in natural open areas, including, but not limited to, exotic plant competition for light, water, and nutrients and the formation of thatches that block sunlight from reaching smaller native plants. The project site already contains invasive species (e.g., pampas grass). Exotic plant species may establish adjacent to the project site, and alter habitats and displace native species over time, leading to extirpation of native plant species and unique vegetation communities. The introduction of non-native, invasive animal species could negatively affect native species that may be pollinators of or seed dispersal agents for plants within vegetation communities and special-status plant populations.

Increased Human Activity. Increased human activity could result in the potential for trampling of vegetation outside of the impact footprint, as well as soil compaction, and could affect the viability of plant communities. Trampling can alter the ecosystem, creating gaps in vegetation and allowing exotic, non-native plant species to become established, leading to soil erosion. Trampling may also affect the rate of rainfall interception and evapotranspiration, soil moisture, water penetration pathways, surface flows, and erosion. An increased human population increases the risk of damage to vegetation communities and special-status plants. To prevent inadvertent disturbance to special-status plants within or adjacent to the Peninsula Component, mitigation is proposed requiring that fencing be installed prior to construction activities to protect species from inadvertent disturbance outside of the limits of grading, as well as in an effort to prevent unauthorized access into the canyon.

Alteration of the Natural Fire Regime. The proposed project could potentially increase the risk of fire in the canyon, including, but not limited to, fire associated with electrical shorts or electrical equipment malfunction. Additional fire risks from an increase in human-induced ignition sources (ie, cigarette butts, or other fire ignition sources) would occur. In order to reduce the risk of fire, a brush management zone would be incorporated as part of the Peninsula Component. Brush management zone 1 will include a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 will include a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space. Additional details regarding the brush management zones and associated fire management analysis is provided by the Fire Protection Plan (Dudek 2024). Because the brush management zones would comply with generally accepted fire buffers and conventional fire reduction design features, fire suppression actions that would modify fire intervals would not be necessary.

Long-term indirect impacts to special-status plants associated with generation of fugitive dust, chemical pollutants, altered hydrology, non-native, invasive plant and animal species, increased human activity, and alteration of the natural fire regime within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-4 (construction monitoring and reporting), MM-BIO-5 (invasive species prohibition), and MM-BIO-6 (construction fencing).

No potential long-term indirect impacts to special-status plants are anticipated within the University Towers East Component of the proposed project.

Short-Term Indirect Impacts to Special-Status Wildlife Species

Short-term, construction-related, or temporary indirect impacts to special-status wildlife species that have a high or moderate potential to occur (see Appendix D1) would primarily result from construction activities associated with the proposed project and associated brush management. Potential temporary indirect impacts could occur

as a result of generation of fugitive dust, chemical pollutants, increased human activity, non-native animal species, and noise, as further described below.

Generation of Fugitive Dust. Dust and applications for fugitive dust control can impact vegetation surrounding the limits of grading, resulting in changes in the community structure and function. These changes could result in significant impacts to suitable habitat for special-status wildlife species.

Chemical Pollutants. Accidental spills of hazardous chemicals could contaminate nearby surface waters and groundwater and indirectly impact wildlife species through poisoning or altering suitable habitat.

Non-native, Invasive Animal Species. Trash from construction-related activities could attract native and non-native, invasive predators, such as ravens (*Corvus corax*) and coyotes (*Canis latrans*), which could impact the wildlife species in the project site.

Increased Human Activity. Construction activities adjacent to the canyon can deter wildlife from using already constrained habitat areas near the proposed project footprint.

Noise. Construction-related noise could occur from equipment used during brush management and construction of student residential facilities and associated infrastructure. Noise impacts can have a variety of indirect impacts on wildlife species, including increased stress, weakened immune systems, altered foraging behavior, displacement due to startle, degraded communication with conspecifics (e.g., masking), damaged hearing from extremely loud noises, and increased vulnerability to predators (Lovich and Ennen 2011; Brattstrom and Bondello 1983, as cited in Lovich and Ennen 2011).

If a coastal California gnatcatcher nest is present within a 300-foot buffer of the Peninsula Component site, construction-related noise may result in significant adverse impacts to special-status species. Construction noise would need to be reduced to 60 A-weighted decibel average, or existing ambient levels, whichever is higher, to reduce potential impacts. Short-term indirect impacts to special-status wildlife associated with construction noise within the Peninsula Component would be potentially significant absent mitigation. One method of avoiding potential construction noise-related impacts would be to suspend construction during nesting season (February 1 through September 15); however, this method would substantially lengthen the duration of construction such that completion of the Proposed Project would be delayed a minimum of 5-10 years at substantially increased cost and delay in providing the necessary housing and related benefits that would result from the Project in meeting the Project objectives.

Rather, the Proposed Project would implement **MM-BIO-7,** which would include pre-construction survey(s) for the coastal California gnatcatcher prior to construction work between February 1 and September 15. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques shall be implemented during the breeding season to ensure that construction noise levels do not exceed 60 A-weighted decibels hourly equivalent sound level (L_{eq-h})_or pre-construction ambient noise levels, whichever is higher, during the breeding season, until the completion of the nesting cycle, as determined by the biologist. While this mitigation would likely reduce potential impacts related to construction noise, because it is not known at this time the location of any potential future nests, nor the feasibility of each noise reduction technique, it cannot be concluded with certainty the mitigation measure would reduce the impact to a less-than-significant level. As such, the impact would be **significant and unavoidable.**

In addition to short-term construction-related noise impacts, portions of the Peninsula Component to be ultimately developed as student housing (Buildings 5 and 6) would, in the interim, be developed as recreation fields. Consistent with the Project's construction phasing schedule, four student residential buildings, as well as the Amenity Building, would be constructed initially, which would leave a temporary open area (consisting of urban/developed land cover) in the southwestern corner of the Peninsula Component site. Recreation fields would be built in this area for recreational use by student residents of the Peninsula Component as an interim land use. Typical student use of the fields for daily activities would likely be below 60 A-weighted decibels L_{eq-h} by the time sound reaches the habitat (Dudek 2024; Caltrans 2013). During subsequent construction phases, the fields would be removed and replaced by the remaining proposed student residential buildings.

If the biological surveys determine that there is sensitive wildlife in the area, the recreational uses may result in noise impacts within the native habitat due to elevated noise from the users of the recreational fields, particularly if amplified sound is used. These elevated noise levels could result in a potentially significant impact absent mitigation as the noise levels could disturb sensitive wildlife if determined to be present and/or nesting.

SDSU has published a document entitled Regulations for Use Of University Buildings And Grounds. Section 8.0 and Appendix B address sound amplification, such as when, where, and what decibel levels are permissible throughout the campus (SDSU 2024). All Proposed Project activities that include amplified noise would (at a minimum) be subject to the guidelines, restrictions, and regulations set forth in this document. Section 8.0 of the Regulations for Use Of University Buildings And Grounds states that "use of amplified sound in outdoor space is restricted and must be approved in advance to designated outdoor campus locations in order to preserve the academic and research mission of the University."

Section 8.0 outlines permissible sound levels for amplified sound as 90 decibels when measured 50 feet from the sound source and 65 decibels when measured from inside the nearest classroom. Section 8.0 continues to outline permitted time for amplified sound to be from 10:00 a.m. to 2:00 p.m. Appendix B lists locations on campus approved for amplified sound. The Project site is not listed as a location of approved amplified sound. If amplified sound is proposed for use as part of the proposed interim recreational fields, approval by the Vice President for Business and Financial Affairs is required, and all amplified sound would comply with the regulations outlined in the Regulations for Use Of University Buildings And Grounds.

If amplified/elevated sound is approved, in addition to complying with the above regulations, noise reduction techniques are to be applied to ensure that amplified and/or elevated noise from operational use (i.e., sporting/student/campus events) of the recreational fields do not result in significant noise impacts to the coastal California gnatcatcher. Specifically, mitigation is recommended that provides prior to any elevated and/or amplified field noise expected to occur between February 1 and September 15, the CSU/SDSU, or its designee, shall retain a qualified biologist to conduct survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat within a 300-foot buffer of the recreational field(s) within the Peninsula Component site. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques (e.g., pausing work to create a 60 A-weighted decibel average, or existing ambient levels, whichever is higher directing speakers away from habitat) shall be implemented to ensure that operational noise levels do not exceed 60 A-weighted decibels L_{eq-h} or existing ambient levels, whichever is higher, at any nest location(s).

Short-term indirect impacts to special-status wildlife associated with potential amplified recreational field noise within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to

less than significant through implementation of MM-BIO-8 (potential mitigation for operational amplified field noise).

Lighting. The sports fields and access road that would be constructed will be regularly illuminated. As discussed in the exterior lighting study by Francis Krahe & Associates (2024), included as Appendix B-2 in the Draft EIR, the Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, the lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1, Aesthetics, of the Draft EIR. Further, all field lighting would only be illuminated from 6am to 11pm. Therefore, impacts would be less than significant.

Short-term indirect impacts to special-status wildlife species associated with generation of fugitive dust, chemical pollutants, non-native and/or invasive animal species, increased human activity, and noise within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-4 (construction monitoring and reporting), MM-BIO-5 (invasive species prohibition), MM-BIO-6 (construction fencing), MM-BIO-7 (construction noise monitoring), and MM-BIO-8 (potential mitigation for operational amplified field noise).

No potential short-term indirect impacts to special-status wildlife species are anticipated within the University Towers East Component of the proposed project.

Long-Term Indirect Impacts to Special-Status Wildlife Species

Potential long-term or permanent indirect impacts associated with the proposed project including brush management to sensitive wildlife species that have high or moderate potential to occur (see Appendix D1) include generation of fugitive dust; non-native, invasive plant and animal species; habitat fragmentation; increased human activity; alteration of the natural fire regime; and altered hydrology.

Generation of Fugitive Dust. See prior discussion of the effects of fugitive dust on special-status wildlife.

Altered Hydrology. Water would be used for landscaping purposes that may alter the on-site hydrologic regime. These hydrologic alterations may affect special-status wildlife species. Altered hydrology can allow for the establishment of non-native plants and invasion by Argentine ants, which can compete with native ant species that could be seed dispersers or plant pollinators. Changes in plant composition could affect the native vegetation communities and wildlife habitat. However, the water, and associated runoff, used during landscaping activities would be contained within the project impact footprint, and long-term indirect impacts associated with altered hydrology are not expected.

Non-native, Invasive Plant and Animal Species. Invasive plant species that thrive in edge habitats are a well-documented problem in Southern California and throughout the United States. Bossard et al. (2000) list several adverse effects of non-native species in natural open areas, including, but not limited to, the fact that exotic plants compete for light, water, and nutrients, and can create a thatch that blocks sunlight from reaching smaller native plants. Exotic plant species may alter habitats and displace native species over time, leading to extirpation of native

plant species and subsequently suitable habitat for special-status wildlife species. In addition, trash can attract invasive predators, such as ravens and coyotes, which could impact the wildlife species in the project site.

Increased Human Activity. The Proposed Project would provide more on-campus student residential facilities, leading to increased human activity that could result in the potential for trampling of vegetation outside of the Peninsula Component impact footprint, and soil compaction could affect the viability and function of suitable habitat for wildlife species. An increased human population increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity can deter wildlife from using habitat areas near the Peninsula Component footprint.

Alteration of the Natural Fire Regime. The proposed project could potentially increase the risk of fire in the canyon, including, but not limited to, fire associated with electrical shorts or electrical equipment malfunction. Additional fire risks from an increase in human-induced ignition sources (ie, cigarette butts, or other fire ignition sources) would also occur. In order to reduce the risk of fire, a brush management zone is incorporated as part of the Peninsula Component. Brush management zone 1 will include a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 will include a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space. Additional details regarding the brush management zones and associated fire management analysis is provided by the Fire Protection Plan (Dudek 2024). Because the brush management zones would comply with generally accepted fire buffers and conventional fire reduction design features, fire suppression actions that would modify fire intervals would not be necessary.

Lighting. The sports fields and access road that would be constructed would be regularly illuminated. As discussed in Appendix B-2 of the Draft EIR, the Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1 of this Draft EIR. Further, all field lighting would only be illuminated from 6:00 a.m. to 11:00 p.m. Therefore, long-term indirect impacts to wildlife are not expected.

Long-term indirect impacts to special-status wildlife species associated with generation of fugitive dust, altered hydrology, non-native invasive plant and animal species, increased human activity, and alteration of the natural fire regime within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-4 (construction monitoring and reporting), MM-BIO-5 (invasive species prohibition), and MM-BIO-6 (construction fencing).

No potential long-term indirect impacts to special-status wildlife species are anticipated within the University Towers East Component of the proposed project.

6.2 Threshold 2

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The University Towers East Component site does not contain any sensitive natural communities or jurisdictional waters. As such, **no impacts** would occur.

The discussion below analyzes development of the Peninsula Component site and potential impacts to riparian habitat or other sensitive natural communities.

6.2.1 Direct Impacts

Neither the redevelopment area within the Peninsula Component site nor brush management zones 1 or 2 within the Peninsula Component site support any riparian habitat. These areas are comprised entirely of upland habitat, ornamental vegetation, non-native vegetation, or urban/developed areas. Diegan coastal sage scrub is considered a sensitive natural community by CDFW under CEQA (CDFG 2010). Impacts are proposed to 0.55 acres of Diegan coastal sage scrub (disturbed), a sensitive natural community, within portions of the area designated as brush management zone 2 within the Peninsula Component. Direct impacts to this sensitive natural community would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

No other sensitive natural communities are present within the proposed Peninsula Component or the University Towers East Component.

6.2.2 Indirect Impacts

Sensitive Natural Communities

Potential short-term and long-term indirect impacts to sensitive natural communities associated with development of the Peninsula Component site, including associated brush management, would be the same as those described for special-status plants in Section 6.1.2 of this Biological Resources Technical Report. These impacts would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), and **MM-BIO-6** (construction fencing).

Jurisdictional Waters

Development proposed as part of the Peninsula Component site, including associated brush management zones, would avoid the unvegetated channel within the Peninsula Study Area. Because of the distance of the channel from Project activities (redevelopment areas and brush management zones), there would be no substantial adverse effect on the unvegetated channel and impacts would be **less than significant**.

The University Towers East Component site does not contain any sensitive Natural Communities or Jurisdictional Waters that potentially would be impacted by the proposed project.

6.3 Threshold 3

Would the project 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?

The non-native riparian area within the western side of the Peninsula Study Area would be considered a wetland if there were positive wetland indicators of all three parameters present: hydrology, soil, and vegetation. However, these indicators are not present and therefore this area is not considered a wetland. The Project site does not contain any state or federally protected wetlands. Therefore, the Proposed Project would not have a substantial adverse effect on state or federally protected wetlands and **no impact** would occur.

The University Towers East Component site does not contain any state or federally protected wetlands that potentially would be affected by the proposed project.

6.4 Threshold 4

Would the project 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?

The University Towers East Component site is urban/developed and surrounded by land that is urban/developed. Therefore, the University Towers East Component site would not support dispersal and movement between wildlife corridors or have the potential to directly or indirectly impact habitat connectivity, and **no impact** would occur.

The discussion below analyzes development within the Peninsula Component site and potential impacts to the movement of any native resident or migratory fish or wildlife species, to established native resident or migratory wildlife corridors, or to the use of native wildlife nursery sites.

6.4.1 Direct Impacts

The proposed project and associated brush management that would be conducted on the Peninsula Component site includes a portion of the canyon situated between the existing SDSU buildings/parking lot and the homes to the west/northwest along Hewlett Drive. While the Peninsula Study Area supports a linkage function within the canyon, it is not considered a wildlife corridor because it is cut off from connection to southern portions of the county and has more of a cul-de-sac function of habitat for species that are tolerant of the urban interface. While coastal California gnatcatcher were not detected in the 2017 surveys conducted in support of the adjacent SDSU New Student Housing Project (Dudek 2017), this species has potential to occur in the coastal sage scrub and the surveys that are to be conducted into 2025 will provide current information on the species presence/absence.

The proposed project, including associated brush management would primarily impact the existing urban/developed portion of the Peninsula Component that consists of urban/developed land and ornamental

plantings and as a result is unlikely to support dispersal and movement between connected canyons. Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and impacts would be **less than significant**. However, the proposed impacts associated with brush management zone 2 within the Peninsula Component would impact 0.55 acres of Diegan coastal sage scrub. If the surveys currently underway reveal that coastal California gnatcatcher occupy the coastal sage scrub on site, impacts to the coastal sage scrub site could interfere with gnatcatcher's use of habitat in these canyons. Therefore, impacts to the movement of wildlife species at the Peninsula Component site would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1**.

6.4.2 Indirect Impacts

Short-Term Indirect Impacts

Short-term indirect impacts to habitat connectivity and wildlife corridors could result from increased human activity, noise, and lighting associated with development proposed on the Peninsula Component site.

Increased Human Activity. Project construction would likely take place during the daytime which would result in an increase in human activity during the majority of the daylight hours. Diurnal wildlife species would likely be most affected as a result of increased human activity. An increased human population increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity can deter wildlife from using habitat areas near the proposed project footprint. Although the native habitat in the canyon is already constrained, some species use a variety of habitats and could continue using other areas within and adjacent to the project site for wildlife movement, therefore, short-term indirect impacts associated with increased human activity could be potentially significant absent mitigation.

Noise. An increase in construction-related noise could occur from Project activities and equipment used during brush management and construction of student residential facilities and associated infrastructure. Noise impacts can have a variety of indirect impacts on wildlife species, including increased stress, weakened immune systems, altered foraging behavior, displacement due to startle, degraded communication with conspecifics (e.g., masking), damaged hearing from extremely loud noises, and increased vulnerability to predators (Lovich and Ennen 2011; Brattstrom and Bondello 1983, cited in Lovich and Ennen 2011). Therefore, an increase in noise could potentially affect how wildlife use and move through the adjacent canyon. Some species use a variety of habitats and could continue using other areas within and adjacent to the Peninsula Component for wildlife movement; however, the native habitat in the canyon is already constrained. Therefore, short-term indirect impacts associated with increased noise could be potentially significant absent mitigation.

SDSU has published a document entitled Regulations For Use Of University Buildings And Grounds, which addresses sound amplification, such as when, where, and what decibel levels are permissible throughout the campus (SDSU 2024). All Proposed Project activities that include amplified noise would (at a minimum) be subject to the guidelines, restrictions, and regulations set forth in this document.

In addition to short-term construction-related noise impacts, portions of the Peninsula Component site to be developed as student housing would, in the interim, be developed as recreation fields, which could also result in potential noise impacts. Consistent with the Project's construction phasing schedule, four student residential buildings, as well as the Amenity Building, would be constructed initially, which would leave a temporary open area

(consisting of urban/developed land cover) in the southwestern corner of the Peninsula Component site. As part of the Project, recreation fields would be built in this area for recreational use. During subsequent construction phases, the fields would be removed and replaced by the remaining proposed student housing.

If sensitive wildlife does use the adjacent canyon as a corridor, the recreational uses may result in noise impacts within the native habitat in the area due to elevated noise from the users of the recreational fields. These elevated noise levels could result in a potentially significant impact absent mitigation such as noise attenuation measures, as the noise levels could disturb sensitive wildlife. Therefore, short-term indirect impacts associated with increased noise could be potentially significant absent mitigation.

Lighting. The sports fields and access road that would be constructed would be regularly illuminated. As discussed in Appendix B-2 of the Draft EIR, the Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, the lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1 of the Draft EIR. Further, all field lighting would only be illuminated from 6:00 a.m. to 11:00 p.m. Therefore, impacts would be less than significant.

Potential short-term indirect impacts to wildlife movement associated with increased human activity and noise within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-6 (construction fencing), MM-BIO-7 (construction noise monitoring), and MM-BIO-8 (potential mitigation for operational amplified field noise).

The University Towers East Component site does not contain wildlife corridors and therefore would not impact habitat connectivity in the short-term.

Long-Term Indirect Impacts

Long-term indirect impacts associated with the Proposed Project include increased human activity at the Peninsula Component site that could result in long-term indirect impacts.

Increased Human Activity. Increased human activity could potentially affect the adjacent canyon and suitable habitat for wildlife species as it increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity could deter wildlife from using habitat areas near the Peninsula Component footprint.

Lighting. Nighttime lighting (including security lighting) would be associated with the buildings, walkways, parking areas, and plazas. However, all lighting would be directed towards the interior of the proposed Peninsula Component and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife.

Potential long-term indirect impacts to wildlife movement associated with increased human activity within the Peninsula Component site would be potentially significant absent mitigation. Impacts would be reduced to less than significant through implementation of MM-BIO-6 (construction fencing).

The University Towers East Component site does not contain wildlife corridors and therefore would not impact habitat connectivity in the long-term.

6.5 Threshold 5

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The lead agency, the CSU, is a state agency; therefore, it is not subject to the policies and ordinances set forth by local agencies such as the City or County of San Diego, which might maintain a local tree preservation policy or ordinance. The CSU and the SDSU Campus Master Plan do not provide any policies specific to protecting biological resources. Therefore, **no impact** would occur.

6.6 Threshold 6

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

SDSU is not a signatory to the San Diego MSCP and thus is not a "permittee" under the HCP that encompasses a portion of the undeveloped canyon to the west of the Peninsula Component site. As such, SDSU is not subject to the MSCP and need not comply with its provisions. Because SDSU is not subject to the policies and ordinances set forth by the MSCP, the Proposed Project would not conflict with the HCP, and **no impact** would occur.

6.7 Threshold 7

Would the project result in a cumulative impact when considered with other present and probable future projects in the region?

The Proposed Project, when combined with existing and probable future projects within the SDSU campus and the surrounding area (see Chapter 3, Cumulative Methods and Projects, Table 3-1), could contribute to significant cumulative impacts on biological resources. The Proposed Project would have potentially significant direct and indirect impacts to special-status plants, coastal California gnatcatcher, special-status reptiles, special-status mammals, birds protected under the MBTA, and a sensitive natural community (coastal sage scrub). Absent mitigation, these impacts would make a cumulatively considerable contribution to a significant cumulative effect on the species in question. Of the projects described in Table 3-1, the City's ongoing or proposed projects would likely contribute to indirect impacts to biological resources from increased human activity, fugitive dust, pollutants, altered hydrology, and introduction of non-native species. Other present and probable projects within the region would be discussed further in the associated CEQA document.

The potentially significant impacts associated with the Proposed Project would be reduced to less than significant through implementation of the MMs recommended in Section 4.3.7. Specifically, direct impacts to sensitive natural communities, special-status species, or wildlife movement if coastal California gnatcatcher is present would be mitigated through **MM-BIO-1** (habitat mitigation), **MM-BIO-2** (coastal California gnatcatcher surveys), and **MM-BIO-3** (nesting bird surveys), and potential indirect impacts would be mitigated through **MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), **MM-BIO-6** (construction monitoring and

reporting), and **MM-BIO-8** (potential mitigation for operational amplified field noise). Implementation of these measures would reduce cumulative impacts to **less than significant**. Because it cannot be concluded that **MM-BIO-7** (construction noise monitoring and noise reduction measures) would fully reduce the potential impact related to noise from construction, this impact would be **significant and unavoidable.** As this potential impact could result in indirect impacts to the coastal California gnatcatcher, and other cumulative projects listed in Table 3-1 may also result in indirect impacts to the coastal California gnatcatcher, this would result in a **significant and unavoidable** cumulative impact.

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7 Mitigation Measures

The following mitigation measures would reduce the potential for direct and indirect impacts to special-status plant and wildlife species, sensitive natural communities, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible. Implementation of the following mitigation measures would reduce most impacts to a less-than-significant level. Some impacts would remain significant and unavoidable.

MM-BIO-1 Habitat Mitigation: If coastal California gnatcatcher is determined to be present within the Peninsula Study Area and/or the Peninsula Component site, impacts to disturbed Diegan coastal sage scrub beyond those impacts presently occurring due to existing brush management practices on the site shall be mitigated according to the requirements of **MM-BIO-2**. If coastal California gnatcatcher is determined to be absent, and the Project would result in impacts to coastal sage scrub beyond those impacts presently occurring due to existing brush management practices, the California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to Diegan coastal sage scrub, including brush management zones, by the conservation of non-occupied coastal sage scrub habitat at a 1:1 ratio. Conservation of habitat shall be by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County.

The mitigation habitat shall include appropriate habitat for special-status reptiles with potential to occur on site. The mitigation habitat shall also support special-status plants, if found to occur on site, or be suitable for enhancement and planting of special-status plants. If surveys identify the presence of special-status plants that would be removed as part of the Project, the CSU/SDSU, or its designee, shall implement a plant mitigation and monitoring plan to ensure the success of any enhancement, translocation, or restoration.

MM-BIO-2 Coastal California Gnatcatcher: If the biological surveys presently being conducted determine the coastal California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component site, and brush management is necessary beyond the scope of brush management presently being conducted on the site, the California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to disturbed Diegan coastal sage scrub, including brush management zones, through conservation of coastal California gnatcatcher-occupied Diegan coastal sage scrub. Mitigation shall be provided at a 2:1 ratio either by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County.

Additionally, if the surveys determine coastal California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component, the CSU/SDSU shall consult with the U.S. Fish and Wildlife Service prior to the commencement of construction activities within suitable gnatcatcher habitat to determine if the Project needs to obtain a Section 7 or Section 10 permit.

If the biological surveys determine coastal California gnatcatcher is not present within the Peninsula Study Area and/or would not be affected by the Peninsula Component, no mitigation for the species is required, including this mitigation measure (**MM-BIO-2**) and related **MM-BIO-7**.

MM-BIO-3 Nesting Bird Survey(s): If construction activity occurs during the breeding season (typically January 15 through September 15), the California State University/San Diego State University, or its designee, shall retain a qualified biologist to conduct a biological survey for nesting bird species protected by the federal Migratory Bird Treaty Act and California Fish and Game Code within 72 hours prior to construction. The survey shall be conducted within both the Peninsula Component site and the University Towers East Component site and a 300-foot buffer beyond each site. If any active nests are detected, the area shall be flagged and mapped on the construction plans along with a minimum of a 25-foot buffer and up to a maximum of 300 feet for raptors, as determined by the biologist, and such areas shall be avoided until the nesting cycle is complete as determined by the biologist.

MM-BIO-4 Construction Monitoring and Reporting: To prevent inadvertent disturbance to areas outside the limits of grading, the California State University/San Diego State University, or its designee, shall retain a qualified biologist to monitor all grading activities on the Project site. The biological monitor shall be contracted to perform biological monitoring during all grading, clearing, grubbing, and construction activities.

The biological monitor shall perform the following duties:

1. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).
2. Conduct meetings with the contractor and other key construction personnel to describe the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife prior to clearing, grubbing, or grading.
3. Review and/or designate the construction area in the field with the contractor in accordance with the final grading plan prior to clearing, grubbing, or grading.
4. Supervise and monitor vegetation clearing, grubbing, and grading weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is intact.
5. Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.
6. Verify that the construction site is implementing the following stormwater pollution prevention plan best management practices: dust-control, silt fencing, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and weather-proof, prohibition of pets on the construction site, and a speed limit of 15 miles per hour during the daylight and 10 miles per hour during dark hours.
7. Periodically monitor the construction site after grading is completed and during the construction phase to see that artificial security light fixtures are directed away from open space and are shielded and to document that no unauthorized impacts have occurred.
8. Keep monitoring notes for the duration of the Project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources.

9. Prepare a monitoring report after the construction activities are completed, which describes the biological monitoring activities, including a monitoring log; photos of the site before, during, and after the grading and clearing activities; and a list of special-status species observed.

MM-BIO-5 Invasive Species Prohibition: The California State University/San Diego State University, or its designee, shall ensure that final landscape plans for the Project site comply with the following provisions: (1) no invasive plant species included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the Project region shall be included, and (2) the plant palette shall be composed of native species that do not require high irrigation rates. The biologist retained for monitoring shall periodically check landscape products for compliance with this requirement.

MM-BIO-6 Construction Fencing: To prevent inadvertent disturbance to sensitive vegetation and species within or adjacent to the sites, the California State University/San Diego State University, or its designee, shall install fencing on the Project site prior to the commencement of construction activities. The fencing shall be placed to protect sensitive vegetation and species from inadvertent disturbance outside of the limits of grading, as well as in an effort to prevent unauthorized access into the canyon adjacent to the Peninsula Component site.

MM-BIO-7 Construction Noise Monitoring: For any work proposed between February 1 and September 15, prior to start of construction activities, the California State University/San Diego State University, or its designee, shall retain a qualified biologist to conduct a pre-construction survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat on the Peninsula Component site. The pre-construction survey area for the coastal California gnatcatcher shall encompass all suitable habitats within the Peninsula Component site, as well as within a 300-foot buffer. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels hourly equivalent sound level or pre-construction ambient noise levels, whichever is higher, during the breeding season, at any nest location(s). Noise monitoring and noise reduction techniques shall be implemented until the end of the nesting cycle for the detected nest as determined by the qualified biologist. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter equipment, adherence to equipment maintenance schedules, installation of temporary sound barriers, or shifting construction work away from occupied areas and/or further from the nest.

MM-BIO-8 Potential Mitigation for Operational Amplified Field Noise: If amplified/elevated noise that would result in ambient noise level of above 60 A-weighted decibel average, or existing ambient noise level, whichever is higher, is anticipated from operational use (i.e., sporting/student/campus events) of the recreation fields, noise reduction techniques shall be implemented to ensure that amplified and/or elevated noise does not result in noise impacts to the coastal California gnatcatcher. Prior to any such elevated and/or amplified field noise expected to occur between February 1 and September 15, the California State University/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to conduct survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied

habitat within a 300-foot buffer of the recreational field(s) within the Peninsula Component site. If no nest is detected, no further action is necessary. If a coastal California gnatcatcher nest is detected, SDSU or its designee shall implement feasible noise reduction techniques to ensure that noise levels at the nest are not higher than 60 A-weighted decibels hourly equivalent sound level or existing ambient noise levels, whichever is higher. Noise reduction techniques shall be implemented if feasible. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter sound equipment, focusing sound equipment eastward to avoid projection into the adjacent canyon, installation of temporary sound barriers, or shifting construction work away from occupied areas and/or further from the nest.

8 Level of Significance after Mitigation

Implementation of the above mitigation measures would reduce most potential impacts to biological resources to **less-than-significant levels.**

As discussed above, direct and indirect impacts to special-status plants and wildlife at the Project site would be potentially significant prior to mitigation. Direct impacts to special-status plants and wildlife, including special-status plants, special-status birds, special-status reptiles, special-status invertebrates, and birds protected under the MBTA, would be reduced to **less than significant through implementation of MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**. Indirect impacts to special-status plants and wildlife would be reduced to **less than significant through implementation of MM-BIO-4**, **MM-BIO-5**, **MM-BIO-6**, and **MM-BIO-8**.

Indirect impacts related to construction noise would not be reduced to less than significant, even with the implementation of **MM-BIO-7**. This impact would be **significant and unavoidable**.

Direct and indirect impacts to riparian habitat or sensitive natural communities at the Peninsula Component site would be potentially significant prior to mitigation. Direct impacts to sensitive natural communities would be reduced to **less than significant through implementation of MM-BIO-1**. Indirect impacts to sensitive natural communities would be reduced to **less than significant through implementation of MM-BIO-4**, **MM-BIO-5**, and **MM-BIO-6**.

Direct and indirect impacts to wildlife movement at the Peninsula Component site would be potentially significant prior to mitigation. Direct impacts would be reduced to **less than significant through implementation of MM-BIO-1**. Short-term and long-term indirect impacts would be reduced to **less than significant through implementation of MM-BIO-6**, **MM-BIO-7**, and **MM-BIO-8**.

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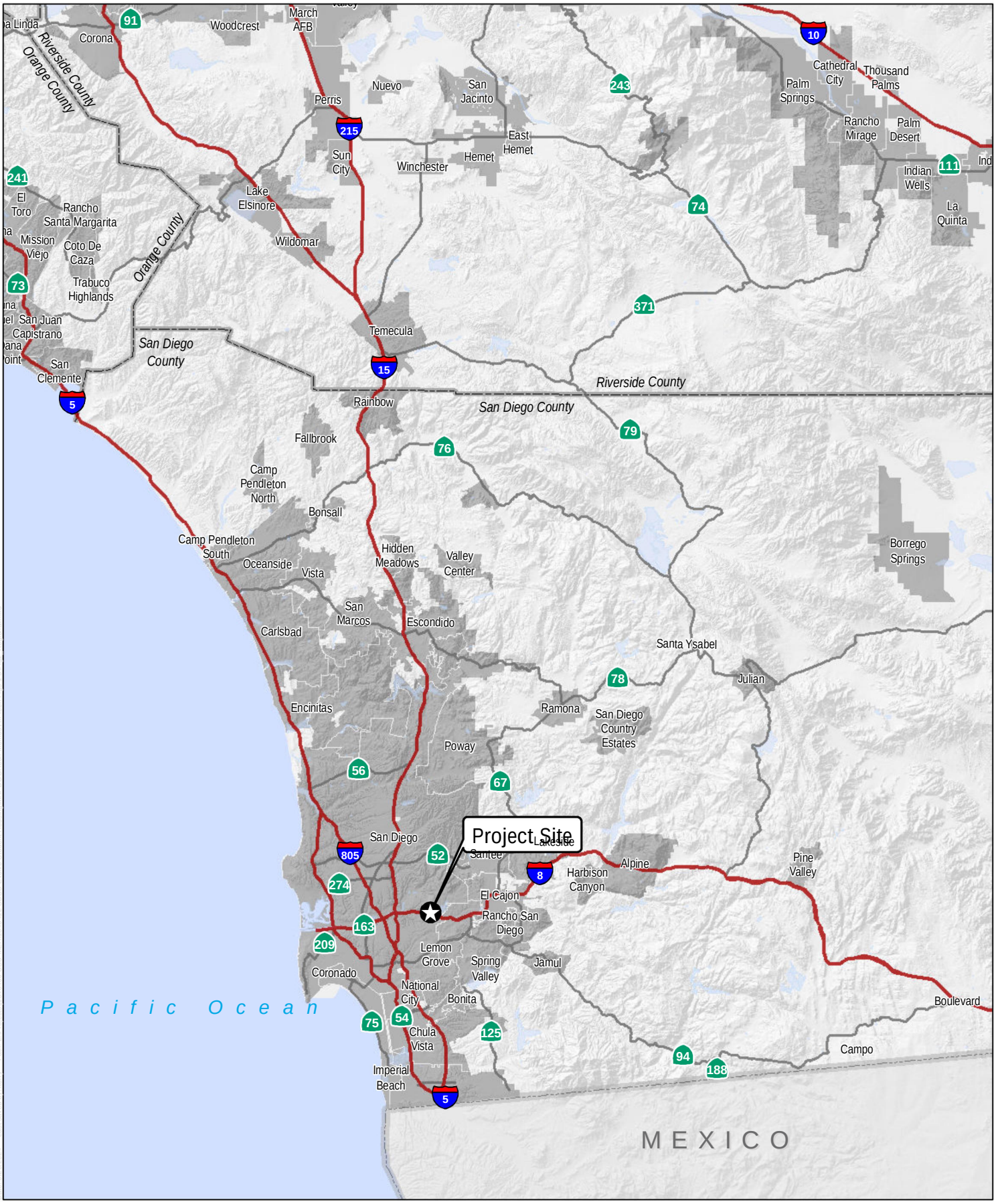

SOURCE: SOURCE: ESRI

DUDEK

0 5 10 Miles

FIGURE 1

Regional Map

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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SOURCE: AERIAL - SANGIS IMAGERY 2023

DUDEK

0 500 1,000 Feet

FIGURE 2
Vicinity Map

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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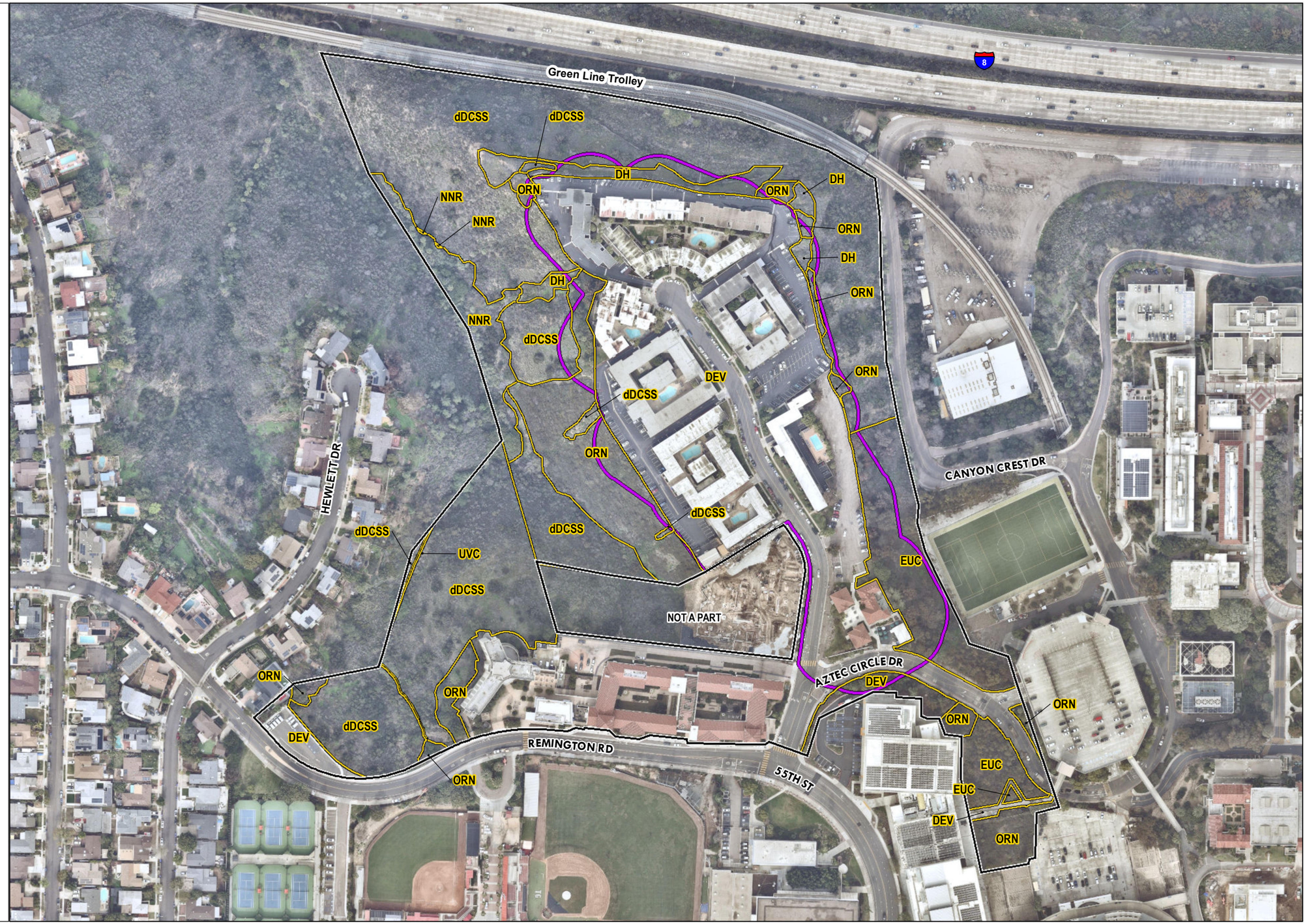
Peninsula Component

Study Area

Vegetation Communities/Land Covers

- dDCSS, disturbed Diegan Coastal Sage Scrub
- DEV, Developed Land
- DH, Disturbed Habitat
- EUC, Eucalyptus Woodland
- NNR, Non-Native Riparian
- ORN, Ornamental
- UVC, Unvegetated Channell



SOURCE: AERIAL-SANGIS IMAGERY 2023

DUDEK

0 110 220 Feet

FIGURE 3A

Peninsula Component and Peninsula Study Area Biological Resources

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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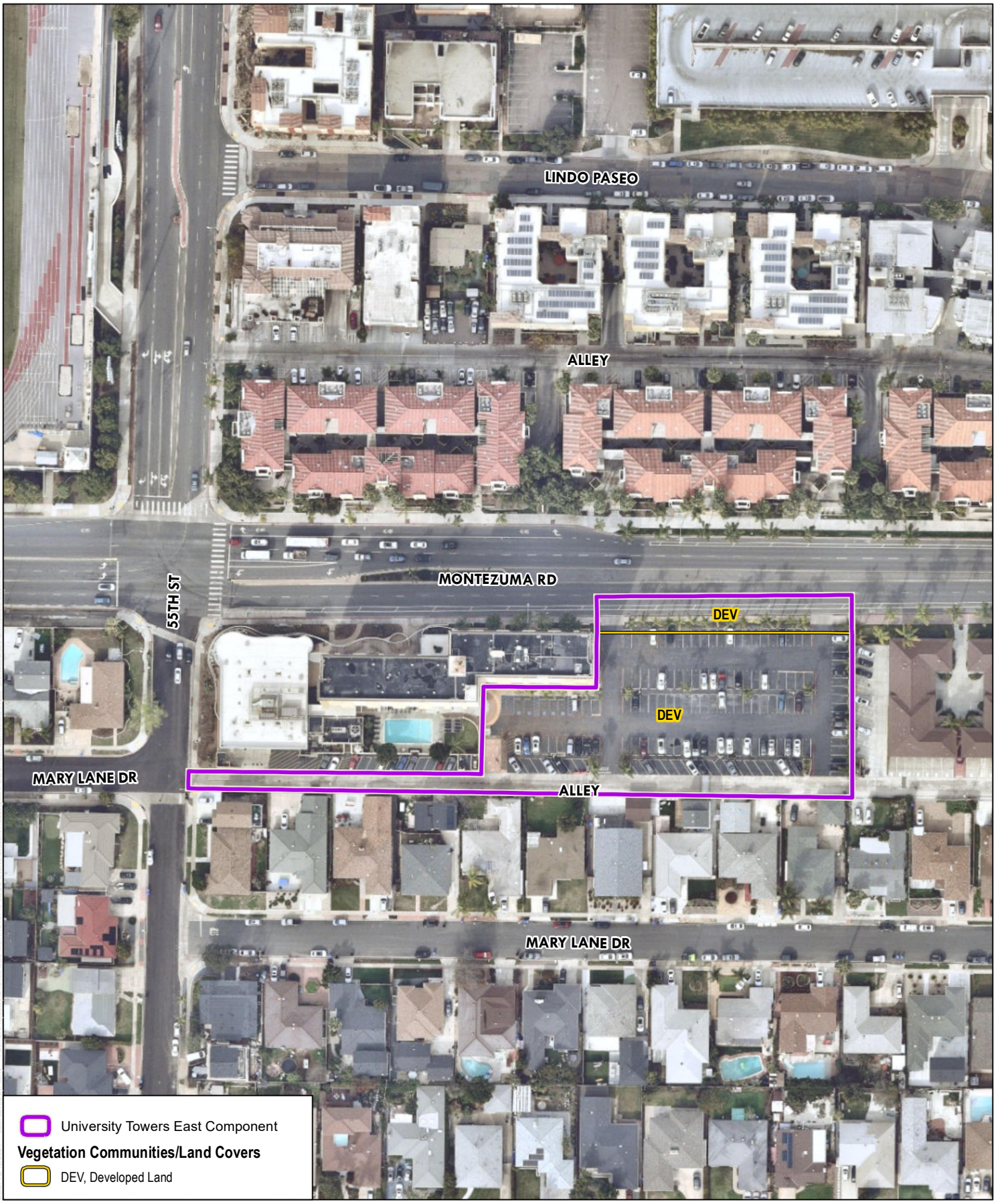

SOURCE: AERIAL - SANGIS IMAGERY 2023

DUDEK

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FIGURE 3B

University Towers East Component Biological Resources

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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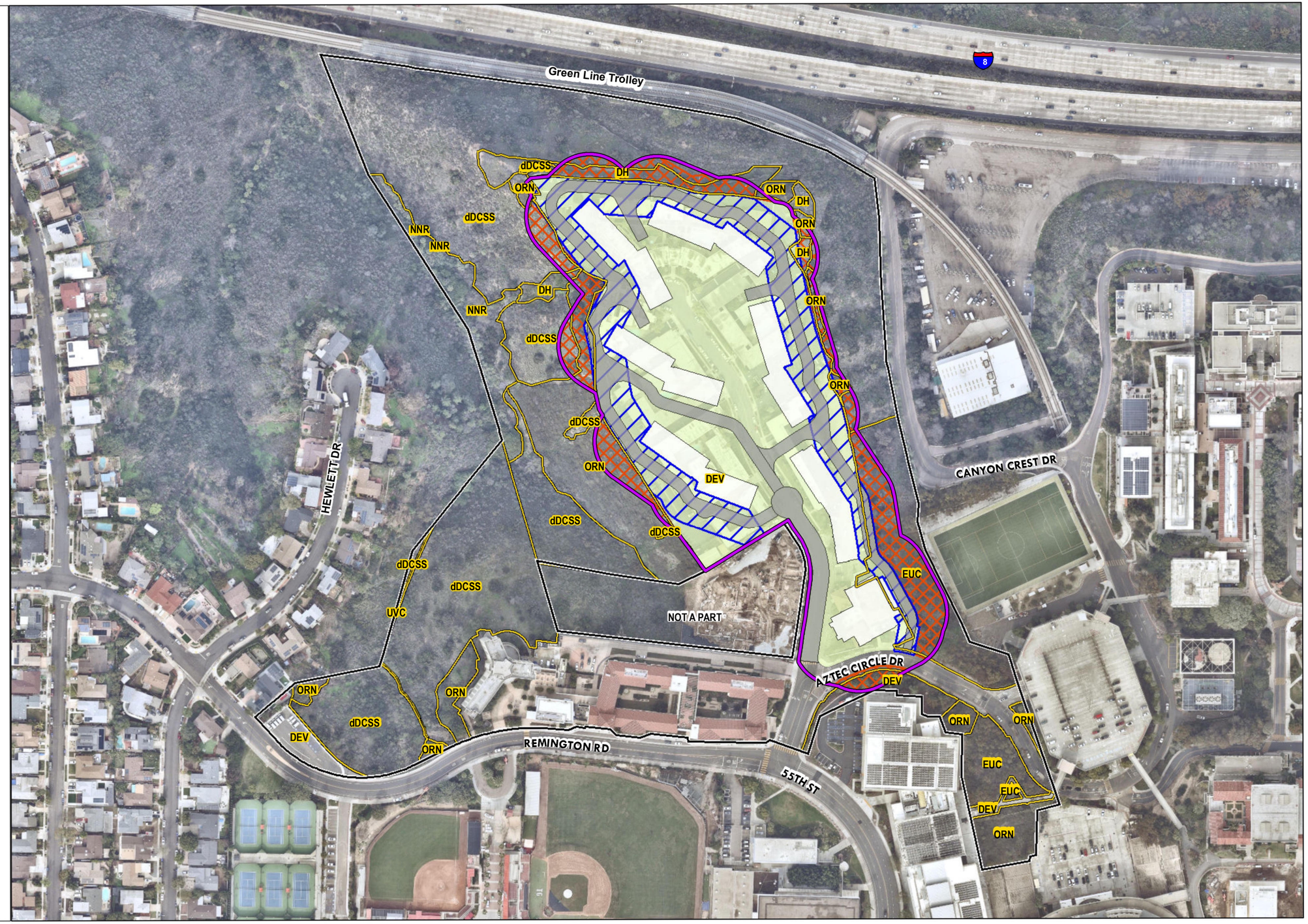
Peninsula Component
Study Area
Proposed Building
Proposed Access Roads

Vegetation Communities/Land Covers

dDCSS, disturbed Diegan Coastal Sage
DEV, Developed Land
DH, Disturbed Habitat
EUC, Eucalyptus Woodland
NNR, Non-Native Riparian
ORN, Ornamental
UVC, Unvegetated Channell

Impacts

Redevelopment Area
FMZ Zone A (≥ 27 feet)
FMZ Zone B (100 feet)



SOURCE: AERIAL-SANGIS IMAGERY 2023

DUDEK

0 110 220 Feet

FIGURE 4A

Proposed Impacts to Peninsula Component and Peninsula Study Area Biological Resources

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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SOURCE: AERIAL - SANGIS IMAGERY 2023; GENSLER 2024

DUDEK

0 60 120 Feet

FIGURE 4B

Proposed Impacts to University Towers East Component Biological Resources

Biological Resources Technical Report for the SDSU Evolve Student Housing Project

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Appendix A
Plant Compendium

Plant Species

Conifers

PINACEAE – PINE FAMILY

* *Pinus pinea* – Italian stone pine

Angiosperms: Eudicots

ADOXACEAE – ADOXA FAMILY

Sambucus nigra ssp. *caerulea* – blue elderberry

AIZOACEAE – FIG-MARIGOLD FAMILY

* *Carpobrotus edulis* – hottentot-fig

AMARANTHACEAE – AMARANTH FAMILY

Malosma laurina – laurel sumac

Rhus integrifolia – lemonadeberry

Rhus ovata – sugar bush

* *Schinus terebinthifolius* – Brazilian pepper tree

APIACEAE – CARROT FAMILY

* *Foeniculum vulgare* – sweet fennel

ASTERACEAE – SUNFLOWER FAMILY

Artemisia californica – coastal sagebrush

Baccharis sarothroides – broom baccharis

* *Centaurea melitensis* – tocalote
* *Lactuca serriola* – prickly lettuce

Baccharis pilularis – chaparral broom, coyote brush

Isocoma menziesii – coastal goldenbush

Stephanomeria exigua – small wreath-plant

CRASSULACEAE – STONECROP FAMILY

Dudleya pulverulenta – chalk dudleya

* *Crassula ovata* – jade plant

ERICACEAE – HEATH FAMILY

Xylococcus bicolor – mission manzanita

EUPHORBIACEAE – SPURGE FAMILY

* *Ricinus communis* – castor bean

FABACEAE – LEGUME FAMILY

* *Acacia longifolia* – sydney golden wattle
* *Acacia redolens* – vanilla scented wattle

LAMIACEAE – MINT FAMILY

Salvia mellifera – black sage

* *Marrubium vulgare* – horehound

MYRTACEAE – MYRTLE FAMILY

* *Eucalyptus camaldulensis* – river red gum

PHRYMACEAE – LOPSEED FAMILY

Diplacus puniceus – coast monkey flower

POLYGONACEAE – BUCKWHEAT FAMILY

* *Rumex crispus* – curly dock

Eriogonum fasciculatum – California buckwheat

ROSACEAE – ROSE FAMILY

Prunus ilicifolia – islay, holly-leaf cherry

SOLANACEAE – NIGHTSHADE FAMILY

* *Nicotiana glauca* – tree tobacco

Angiosperms: Monocots

AGAVACEAE – AGAVE FAMILY

Hesperoyucca whipplei – chaparral candle

ARECACEAE – PALM FAMILY

* *Washingtonia robusta* – Mexican fan palm

POACEAE – GRASS FAMILY

* *Avena barbata* – slender wild oat
* *Bromus diandrus* – ripgut grass
* *Bromus hordeaceus* – soft chess
* *Bromus madritensis* – compact brome
* *Cortaderia jubata* – purple pampas grass
* *Stipa miliacea* var. *miliacea* – smilo grass
* *Cenchrus setaceus* – African fountain grass

* signifies introduced (non-native) species

Appendix B
Wildlife Compendium

Wildlife Species

Birds

Bushtits

AEGITHALIDAE – LONG-TAILED TITS AND BUSHTITS

Psaltriparus minimus – bushtit

Falcons

FALCONIDAE – CARACARAS AND FALCONS

Falco peregrinus anatum – American peregrine falcon

Finches

FRINGILLIDAE – FRINGILLINE AND CARDUELINE FINCHES AND ALLIES

Haemorhous mexicanus – house finch

Spinus psaltria – lesser goldfinch

Flycatchers

TYRANNIDAE – TYRANT FLYCATCHERS

Sayornis nigricans – black phoebe

Tyrannus vociferans – Cassin's kingbird

Hawks

ACCIPITRIDAE – HAWKS, KITES, EAGLES, AND ALLIES

Buteo jamaicensis – red-tailed hawk

Hummingbirds

TROCHILIDAE – HUMMINGBIRDS

Calypte anna – Anna's hummingbird

Jays, Magpies and Crows

CORVIDAE – CROWS AND JAYS

Aphelocoma californica – California scrub-jay

Corvus brachyrhynchos – American crow

Corvus corax – common raven

Mockingbirds and Thrashers

MIMIDAE – MOCKINGBIRDS AND THRASHERS

Mimus polyglottos – northern mockingbird
Toxostoma redivivum – California thrasher

Pigeons and Doves

COLUMBIDAE – PIGEONS AND DOVES

Zenaida macroura – mourning dove
* *Columba livia* – rock pigeon (rock dove)
* *Streptopelia decaocto* – Eurasian collared-dove

Thrushes

TURDIDAE – THRUSHES

Sialia mexicana – western bluebird
Turdus migratorius – American robin

Wood Warblers and Allies

PARULIDAE – WOOD-WARBLERS

Setophaga coronata – yellow-rumped warbler
Leiothlypis celata – orange-crowned warbler

Wrens

TROGLODYTIDAE – WRENS

Thryomanes bewickii – Bewick's wren

Waxbills

ESTRILDIDAE – WAXBILLS

* *Lonchura punctulata* – scaly-breasted munia

New World Sparrows

PASSERELLIDAE – NEW WORLD SPARROWS

Melospiza melodia – song sparrow
Melozone crissalis – California towhee
Pipilo maculatus – spotted towhee
Zonotrichia leucophrys – white-crowned sparrow

Typical Warblers, Parrotbills, Wrentit

SYLVIIDAE – SYLVIID WARBLERS

Chamaea fasciata – wrentit

Mammals

Squirrels

SCIURIDAE – SQUIRRELS

Otospermophilus beecheyi – California ground squirrel

Reptiles

Lizards

PHRYNOSOMATIDAE – IGUANID LIZARDS

Sceloporus occidentalis – western fence lizard

* signifies introduced (non-native) species

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Appendix C1

Special-Status Plants High or Moderate Potential to Occur

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
Acanthomintha ilicifolia	San Diego thorn-mint	FT/SE/1B.1	Narrow Endemic	Chaparral, coastal scrub, valley and foothill grassland, vernal pools; clay, openings/annual herb/Apr–June/35–3,150	**Moderate** potential to occur. There are CNDDB occurrences within 1 mile of the project site (CDFW 2024). Suitable coastal scrub habitat on site, and clay inclusions may be present based on surveys conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017).
Adolphia californica	California adolphia	None/None/2B.1	None	Chaparral, coastal scrub, valley and foothill grassland; clay/perennial deciduous shrub/Dec–May/35–2,430	**Moderate** potential to occur. Suitable coastal scrub habitat is present on site. There is a CNDDB occurrence within 1 mile of the project site (CDFW 2024).
Ambrosia pumila	San Diego ambrosia	FE/None/1B.1	Narrow Endemic	Chaparral, coastal scrub, valley and foothill grassland, vernal pools; alkaline (sometimes), Clay (sometimes), disturbed areas (often), loam (sometimes), sandy (sometimes)/perennial rhizomatous herb/Apr–Oct/65–1,360	**Moderate** potential to occur. Suitable habitat is present on site, and there are nearby CNDDB occurrences (CDFW 2024) and USFWS-designated critical habitat within 5 miles (USFWS 2024).
Bloomeria clevelandii	San Diego goldenstar	None/None/1B.1	Covered	Chaparral, coastal scrub, valley and foothill grassland, vernal pools; clay/perennial bulbiferous herb/Apr–May/165–1,525	**High** potential to occur. Suitable coastal scrub habitat on site. This species was detected during surveys in 2017 for the SDSU New Student Housing Project (Dudek 2017), immediately adjacent to the Peninsula component, so clay inclusions may be present.
Calandrinia breweri	Brewer's calandrinia	None/None/4.2	None	Chaparral, coastal scrub; burned areas, disturbed areas, loam (sometimes), sandy (sometimes)/annual herb/(Jan) Mar–June/35–4,005	**Moderate** potential to occur. Suitable coastal scrub habitat is present on site.
Chorizanthe polygonoides var. *longispina*	long-spined spineflower	None/None/1B.2	None	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools; clay	**Moderate** potential to occur. Coastal scrub present, and clay inclusions may be present based on surveys conducted in 2017 for the

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
				(often)/annual herb/Apr–July/100–5,020	SDSU New Student Housing Project (Dudek 2017).
Convolvulus simulans	small-flowered morning-glory	None/None/4.2	None	Chaparral (openings), coastal scrub, valley and foothill grassland; clay, seeps, serpentinite/annual herb/Mar–July/100–2,430	**High** potential to occur. Suitable scrub habitat is present and two recent records occur 0.25 miles northeast of the site (Calflora 2024).
Dichondra occidentalis	western dichondra	None/None/4.2	None	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland/perennial rhizomatous herb/(Jan)Mar–July/165–1,640	**Moderate** potential to occur. Suitable coastal scrub habitat is present on the site.
Dudleya variegata	variegated dudleya	None/None/1B.2	Narrow Endemic	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools; clay/perennial herb/Apr–June/10–1,905	**Moderate** potential to occur. Suitable scrub habitat is present, and clay inclusions may be present based on surveys conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017). One historic CNDDB record is approximately 0.25 miles west of the site.
Ericameria palmeri var. *palmeri*	Palmer's goldenbush	None/None/1B.1	Covered	Chaparral, coastal scrub; mesic/perennial evergreen shrub/(July) Sep–Nov/100–1,970	**Moderate** potential to occur. Suitable coastal scrub habitat is present. There is one occurrence within 1 mile of the site (Calflora 2024).
Ferocactus viridescens	San Diego barrel cactus	None/None/2B.1	Covered	Chaparral, coastal scrub, valley and foothill grassland, vernal pools/perennial stem/May–June/10–1,475	**High** potential to occur. Suitable coastal scrub habitat is present, and multiple CNDDB occurrences are within 1 mile of the site (CDFW 2024).
Geothallus tuberosus	Campbell's liverwort	None/None/1B.1	None	Coastal scrub (mesic), vernal pools/ephemeral liverwort/N.A./35–1,970	**Moderate** potential to occur. Suitable coastal scrub habitat is present. Several recent occurrences are approximately 0.25 miles northeast of the site; however the site lacks mesic areas.
Harpagonella palmeri	Palmer's grapplinghook	None/None/4.2	None	Chaparral, coastal scrub, valley and foothill grassland; clay,	**Moderate** potential to occur. Suitable coastal scrub habitat is present, and clay

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
				openings/annual herb/Mar–May/65–3,135	inclusions may be present based on surveys conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017). Multiple historic records occur within 1 mile of the site (Calflora 2024).
Holocarpha virgata ssp. *elongata*	graceful tarplant	None/None/4.2	None	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland/annual herb/May–Nov/195–3,610	**Moderate** potential to occur. Suitable coastal scrub is present.
Isocoma menziesii var. *decumbens*	decumbent goldenbush	None/None/1B.2	None	Chaparral, coastal scrub (often disturbed areas, sandy)/perennial shrub/Apr–Nov/35–820	**Moderate** potential to occur. Coastal scrub and disturbed areas are present.
Lepidium virginicum var. *robinsonii*	Robinson's pepper-grass	None/None/4.3	None	Chaparral, coastal scrub/annual herb/Jan–July/5–2905	**Moderate** potential to occur. Suitable coastal scrub habitat is present.
Microseris douglasii ssp. *platycarpha*	small-flowered microseris	None/None/4.2	None	Cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools; clay/annual herb/Mar–May/50–3,510	**Moderate** potential to occur. Suitable coastal scrub habitat is present, and clay inclusions may be present based on surveys conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017).
Pentachaeta aurea ssp. *aurea*	golden-rayed pentachaeta	None/None/4.2	None	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland, valley and foothill grassland/annual herb/Mar–July/260–6,070	**Moderate** potential to occur. Suitable scrub habitat is present.
Pseudognaphalium leucocephalum	white rabbit-tobacco	None/None/2B.2	None	Chaparral, cismontane woodland, coastal scrub, riparian woodland; gravelly, sandy/perennial herb/(July) Aug–Nov (Dec)/0–6,890	**Moderate** potential to occur. Suitable scrub habitat is present.
Quercus dumosa	Nuttall's scrub oak	None/None/1B.1	None	Chaparral, closed-cone coniferous forest, coastal scrub; clay, loam, sandy/perennial evergreen	**Moderate** potential to occur. Suitable scrub habitat is present, and clay inclusions may be present based on surveys conducted in

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
				shrub/Feb–Apr (May–Aug)/50–1,310	2017 for the SDSU New Student Housing Project (Dudek 2017).
Romneya coulteri	Coulter's matilija poppy	None/None/4.2	None	Chaparral, coastal scrub; burned areas (often)/perennial rhizomatous herb/Mar–July (Aug)/65–3,935	**Moderate** potential to occur. Suitable coastal scrub habitat is present.
Salvia munzii	Munz's sage	None/None/2B.2	None	Chaparral, coastal scrub/perennial evergreen shrub/Feb–Apr/375–3,495	**Moderate** potential to occur. Suitable coastal scrub habitat is present.
Selaginella cinerascens	ashy spike-moss	None/None/4.1	None	Chaparral, coastal scrub/perennial rhizomatous herb/N.A./65–2,100	**High** potential to occur. Suitable habitat is on site. One recent occurrence from 2023 is approximately 0.25 miles northeast (Calflora 2024).
Senecio aphanactis	chaparral ragwort	None/None/2B.2	None	Chaparral, cismontane woodland, coastal scrub; Alkaline (sometimes)/annual herb/Jan–Apr (May)/50–2,625	**Moderate** potential to occur. Suitable coastal scrub habitat is present.
Sphaerocarpos drewiae	bottle liverwort	None/None/1B.1	None	Chaparral, coastal scrub; openings/ephemeral liverwort/N.A./295–1,970	**Moderate** potential to occur. Suitable coastal scrub habitat is present.
Stylocline citroleum	oil neststraw	None/None/1B.1	None	Chenopod scrub, coastal scrub, valley and foothill grassland; clay/annual herb/Mar–Apr/165–1,310	**Moderate** potential to occur. Suitable coastal scrub habitat is present, and clay inclusions may be present based on surveys conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017).

Note: MSCP = Multiple Species Conservation Program; CNDDB = California Natural Diversity Database; SDSU = San Diego State University.
Status Legend
Federal
FE: Federally listed as endangered
FT: Federally listed as threatened
State
SE: State listed as endangered
CRPR: California Rare Plant Rank
1B: Plants rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California, but more common elsewhere
4: Plants of Limited Distribution – A Watch List

Threat Rank

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 (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

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Appendix C2

Special-Status Plants Low Potential to Occur

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
Abronia maritima	red sand-verbena	None/None/4.2	None	Coastal dunes/perennial herb/Feb–Nov/0–328	Not expected to occur. No suitable habitat present.
Acmispon prostratus	Nuttall's acmispon	None/None/1B.1	Covered	Coastal dunes, Coastal scrub (sandy)/annual herb/Mar–June(July)/0–35	Not expected to occur. Suitable habitat present but no suitable soils on site. The site is outside of the species' known elevation range.
Agave shawii var. *shawii*	Shaw's agave	None/None/2B.1	Narrow Endemic	Coastal bluff scrub, Coastal scrub/perennial leaf/Sep–May/10–395	Not expected to occur. Coastal scrub habitat is present; however, this species tends to occur along the coast (Calflora 2024).
Ambrosia chenopodiifolia	San Diego bur-sage	None/None/2B.1	None	Coastal scrub/perennial shrub/Apr–June/180–510	**Low** potential to occur. Coastal scrub habitat is present; however, this species tends to occur in southern San Diego County. Site is located within the elevation range for this species (Calflora 2024).
Ambrosia monogyra	singlewhorl burrobrush	None/None/2B.2	None	Chaparral, Sonoran desert scrub; Sandy/perennial shrub/Aug–Nov/35–1,640	Not expected to occur. No suitable vegetation present.
Aphanisma blitoides	Aphanisma	None/None/1B.2	Narrow Endemic	Coastal bluff scrub, Coastal dunes, Coastal scrub; Gravelly (sometimes), Sandy (sometimes)/annual herb/Feb–June/5–1,000	Not expected to occur. No suitable bluff habitat on site (Calflora 2024).
Aphyllon parishii ssp. *brachylobum*	short-lobed broomrape	None/None/4.2	None	Coastal bluff scrub, Coastal dunes, Coastal scrub; Sandy/annual/perennial herb (parasitic)/Apr–Oct/10–1,000	Not expected to occur. Coastal scrub habitat is present; however, occurrences of this species are limited to coastal areas (Calflora 2024).
Arctostaphylos glandulosa ssp. *crassifolia*	Del Mar manzanita	FE/None/1B.1	Covered	Chaparral (maritime, sandy)/perennial evergreen shrub/June–Apr/0–1,200	Not expected to occur. Chaparral habitat is absent from the site. This species tends to occur along the coast in northwest San Diego County (Calflora 2024).
Arctostaphylos otayensis	Otay manzanita	None/None/1B.2	Covered	Chaparral, Cismontane woodland/perennial evergreen shrub/Jan–Apr/900–5,580	Not expected to occur. No suitable habitat or soils on site. The site is outside of the species' known elevation range.

Scientific Name	Common Name	Status (Federal/State/CRPR)	City of San Diego MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
Artemisia palmeri	San Diego sagewort	None/None/4.2	None	Chaparral, Coastal scrub, Riparian forest, Riparian scrub, Riparian woodland; Mesic, Sandy/perennial deciduous shrub/(Feb)May–Sep/15–3,000	**Low** potential to occur. Suitable coastal scrub is present on the site, however no suitable soils on site.
Asplenium vespertinum	western spleenwort	None/None/4.2	None	Chaparral, Cismontane woodland, Coastal scrub; Rocky/perennial rhizomatous herb/Feb–June/590–3,280	**Low** potential to occur. The site is slightly outside of this species' known elevation range; however a historic occurrence is approximately 0.25 miles northeast (Calflora 2024).
Astragalus deanei	Dean's milk-vetch	None/None/1B.1	None	Chaparral, Cismontane woodland, Coastal scrub, Riparian forest/perennial herb/Feb–May/245–2,280	Not expected to occur. No suitable habitat or soils on site. The site is outside of the species' known elevation range.
Astragalus tener var. *titi*	coastal dunes milk-vetch	FE/SE/1B.1	Narrow Endemic	Coastal bluff scrub (sandy), Coastal dunes, Coastal prairie (mesic); Mesic (often), Vernally Mesic (often)/annual herb/Mar–May/5–165	Not expected to occur. No suitable habitat on site. Site is located outside known elevation range for this species.
Atriplex coulteri	Coulter's saltbush	None/None/1B.2	None	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland; Alkaline (sometimes), Clay (sometimes)/perennial herb/Mar–Oct/10–1,510	**Low** potential to occur. Suitable coastal scrub habitat is present and site is located within the elevation range for this species; however, this species tends to occur closer to the coastline (Calflora 2024).
Atriplex pacifica	south coast saltscale	None/None/1B.2	None	Coastal bluff scrub, Coastal dunes, Coastal scrub, Playas/annual herb/Mar–Oct/0–460	**Low** potential to occur. No suitable bluff or dunes habitat on site (Calflora 2024).
Baccharis vanessae	Encinitas baccharis	FT/SE/1B.1	Covered	Chaparral (maritime), Cismontane woodland; Sandstone/perennial deciduous shrub/Aug–Nov/195–2,360	Not expected to occur. No suitable habitat on site.
Bergerocactus emoryi	golden-spined cereus	None/None/2B.2	None	Chaparral, Closed-cone coniferous forest, Coastal scrub;	**Low** potential to occur. Suitable coastal scrub habitat on site; this species tends to

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				Sandy/perennial stem/May–June/10–1,295	occur along the coast in southern San Diego County (Calflora 2024).
Brodiaea filifolia	thread-leaved brodiaea	FT/SE/1B.1	Covered	Chaparral (openings), Cismontane woodland, Coastal scrub, Playas, Valley and foothill grassland, Vernal pools; Clay (often)/perennial bulbiferous herb/Mar–June/80–3,675	Not expected to occur. This species occurs in northern San Diego County and is not known to occur south of Poway (Calflora 2024).
Brodiaea orcuttii	Orcutt's brodiaea	None/None/1B.1	Covered	Chaparral, Cismontane woodland, Closed-cone coniferous forest, Meadows and seeps, Valley and foothill grassland, Vernal pools; Clay, Mesic/perennial bulbiferous herb/May–July/100–5,550	**Low** potential to occur. No suitable vegetation present; however, there are historical records of this species in the vicinity of the site (Calflora 2024).
Calochortus dunnii	Dunn's mariposa-lily	None/SR/1B.2	Covered	Chaparral, Closed-cone coniferous forest, Valley and foothill grassland; Gabbroic (sometimes), Rocky/perennial bulbiferous herb/(Feb)Apr–June/605–6,005	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Camissoniopsis lewisii	Lewis' evening-primrose	None/None/3	None	Cismontane woodland, Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland; Clay (sometimes), Sandy (sometimes)/annual herb/Mar–May(June)/0–985	**Low** potential to occur. Suitable coastal scrub habitat is present, but no sandy or clay soils mapped.
Castilleja plagiotoma	Mojave paintbrush	None/None/4.3	None	Great Basin scrub (alluvial), Joshua tree "woodland", Lower montane coniferous forest, Pinyon and juniper woodland/perennial herb (hemiparasitic)/Apr–June/985–8,205	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.

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Ceanothus cyaneus	Lakeside ceanothus	None/None/1B.2	Covered	Chaparral, Closed-cone coniferous forest/perennial evergreen shrub/Apr–June/770–2,475	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Ceanothus otayensis	Otay Mountain ceanothus	None/None/1B.2	None	Chaparral (gabbroic, metavolcanic)/perennial evergreen shrub/Jan–Apr/1970–3,610	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable habitat present.
Ceanothus verrucosus	wart-stemmed ceanothus	None/None/2B.2	Covered	Chaparral/perennial evergreen shrub/Dec–May/5–1,245	Not expected to occur. No suitable vegetation present.
Centromadia parryi ssp. *australis*	southern tarplant	None/None/1B.1	None	Marshes and swamps (margins), Valley and foothill grassland (vernally mesic), Vernal pools/annual herb/May–Nov/0–1575	Not expected to occur. No suitable vegetation present.
Centromadia pungens ssp. *laevis*	smooth tarplant	None/None/1B.1	None	Chenopod scrub, Meadows and seeps, Playas, Riparian woodland, Valley and foothill grassland; Alkaline/annual herb/Apr–Sep/0–2,100	Not expected to occur. No suitable vegetation present.
Chaenactis glabriuscula var. *orcuttiana*	Orcutt's pincushion	None/None/1B.1	None	Coastal bluff scrub (sandy), Coastal dunes/annual herb/Jan–Aug/0–330	Not expected to occur. No suitable vegetation present.
Chamaebatia australis	southern mountain misery	None/None/4.2	None	Chaparral (gabbroic, metavolcanic)/perennial evergreen shrub/Nov–May/985–3,345	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Chloropyron maritimum ssp. *maritimum*	salt marsh bird's-beak	FE/SE/1B.2	Covered	Coastal dunes, Marshes and swamps (coastal salt)/annual herb (hemiparasitic)/May–Oct (Nov)/0–100	Not expected to occur. No suitable vegetation present.
Chorizanthe leptotheca	Peninsular spineflower	None/None/4.2	None	Chaparral, Coastal scrub, Lower montane coniferous forest; Granitic/annual herb/May–Aug/985–6,235	Not expected to occur. The site is outside of the species' known elevation range.

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Chorizanthe orcuttiana	Orcutt's spineflower	FE/SE/1B.1	None	Chaparral (maritime), Closed-cone coniferous forest, Coastal scrub; Openings, Sandy/annual herb/Mar–May/10–410	**Low** potential to occur. Coastal scrub is present but the site lacks sandy openings. Occurrences tend to be near the coast (Calflora 2024).
Cistanthe maritima	seaside cistanthe	None/None/4.2	None	Coastal bluff scrub, Coastal scrub, Valley and foothill grassland; Sandy/annual herb/(Feb)Mar–June(Aug)/15–985	Not expected to occur. Occurrences tend to be near the coast (Calflora 2024).
Clarkia delicata	delicate clarkia	None/None/1B.2	None	Chaparral, Cismontane woodland; Gabbroic (often)/annual herb/Apr–June/770–3,280	Not expected to occur. No suitable habitat and the site is outside of the species' known elevation range.
Clinopodium chandleri	San Miguel savory	None/None/1B.2	Covered	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland, Valley and foothill grassland; Gabbroic (sometimes), Rocky (sometimes)/perennial shrub/Mar–July/395–3,525	Not expected to occur. This species occurs well east of the site in mountainous regions (Calflora 2024).
Comarostaphylis diversifolia ssp. *diversifolia*	summer holly	None/None/1B.2	None	Chaparral, Cismontane woodland/perennial evergreen shrub/Apr–June/100–2,590	Not expected to occur. No suitable habitat on site.
Corethrogyne filaginifolia var. *incana*	San Diego sand aster	None/None/1B.1	None	Chaparral, Coastal bluff scrub, Coastal scrub/perennial herb/June–Sep/10–375	Not expected to occur. Occurrences are generally limited to coastal San Diego County from Pacific Beach to Point Loma (Calflora 2024; CDFW 2024).
Corethrogyne filaginifolia var. *linifolia*	Del Mar Mesa sand aster	None/None/1B.1	Covered	Chaparral (maritime, openings), Coastal bluff scrub, Coastal scrub; Sandy/perennial herb/May–Sep/15–490	Not expected to occur. Del Mar sand aster occurs on coastal bluffs in sandy soils. Occurrences are limited to northwestern San Diego County along the coast (Calflora 2024; CDFW 2024).
Cylindropuntia californica var. *californica*	snake cholla	None/None/1B.1	Narrow Endemic	Chaparral, Coastal scrub/perennial stem/Apr–May/100–490	**Low** potential to occur. Suitable coastal scrub habitat is present on the site. However, all records of snake cholla are south of the project site (Calflora 2024).

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Deinandra conjugens	Otay tarplant	FT/SE/1B.1	Narrow Endemic	Coastal scrub, Valley and foothill grassland; Clay/annual herb/(Apr) May–June/80–985	**Low** potential to occur. Suitable coastal scrub habitat is present on the site. However, all records of Otay tarplant are south of the project site (Calflora 2024).
Deinandra paniculata	paniculate tarplant	None/None/4.2	None	Coastal scrub, Valley and foothill grassland, Vernal pools; Sandy (sometimes), Vernally Mesic (usually)/annual herb/(Mar)Apr–Nov/80–3,085	**Low** potential to occur. No vernally mesic habitat on site.
Dicranostegia orcuttiana	Orcutt's bird's-beak	None/None/2B.1	Covered	Coastal scrub/annual herb (hemiparasitic)/(Mar)Apr–July(Sep)/35–1,150	**Low** potential to occur. Suitable coastal scrub habitat is present on the site. However, all records of Orcutt's bird's-beak are south of the project site (Calflora 2024).
Diplacus aridus	low bush monkeyflower	None/None/4.3	None	Chaparral (rocky), Sonoran desert scrub/perennial evergreen shrub/Apr–July/2,460–3,935	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Dudleya blochmaniae ssp. *blochmaniae*	Blochman's dudleya	None/None/1B.1	None	Chaparral, Coastal bluff scrub, Coastal scrub, Valley and foothill grassland; Clay (often), Rocky, Serpentinite/perennial herb/Apr–June/15–1,475	Not expected to occur. Blochman's dudleya occurs along the coast (Calflora 2024).
Dudleya brevifolia	short-leaved dudleya	None/SE/1B.1	Narrow Endemic	Chaparral (maritime, openings), Coastal scrub; Sandstone/perennial herb/Apr–May/100–820	Not expected to occur. Short-leaved dudleya occurs north of the site, north of University City (Calflora 2024).
Dudleya viscida	sticky dudleya	None/None/1B.2	Covered	Chaparral, Cismontane woodland, Coastal bluff scrub, Coastal scrub; Rocky/perennial herb/May–June/35–1,805	Not expected to occur. Occurrences are limited to coastal and northwestern San Diego County (Calflora 2024; CDFW 2024).
Eriodictyon sessilifolium	sessile-leaved yerba santa	None/None/2B.1	None	Coastal scrub; Volcanic/perennial shrub/July/560–560	Not expected to occur. This is only one known occurrence of this species between Mira Mesa and Poway (Calflora 2024).

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Eryngium aristulatum var. *parishii*	San Diego button-celery	FE/SE/1B.1	Covered	Coastal scrub, Valley and foothill grassland, Vernal pools; Mesic/annual/perennial herb/Apr–June/65–2,035	Not expected to occur. No vernally mesic habitat present.
Erysimum ammophilum	sand-loving wallflower	None/None/1B.2	Covered	Chaparral (maritime), Coastal dunes, Coastal scrub; Openings, Sandy/perennial herb/Feb–June(July–Aug)/0–195	Not expected to occur. The site is lacking sandy soils. Occurrences are limited to coastal areas (Calflora 2024).
Erythranthe diffusa	Palomar monkeyflower	None/None/4.3	None	Chaparral, Lower montane coniferous forest; Gravelly (sometimes), Sandy (sometimes)/annual herb/Apr–June/4,005–6,005	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Euphorbia misera	cliff spurge	None/None/2B.2	None	Coastal bluff scrub, Coastal scrub, Mojavean desert scrub; Rocky/perennial shrub/(Oct)Dec–Aug/35–1,640	Not expected to occur. Suitable coastal scrub habitat is present, but occurrences are limited to coastal areas (Calflora 2024).
Frankenia palmeri	Palmer's frankenia	None/None/2B.1	None	Coastal dunes, Marshes and swamps (coastal salt), Playas/perennial herb/May–July/0–35	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Fremontodendron mexicanum	Mexican flannelbush	FE/SR/1B.1	None	Chaparral, Cismontane woodland, Closed-cone coniferous forest; Gabbroic, Serpentinite/perennial evergreen shrub/Mar–June/35–2,350	Not expected to occur. No suitable habitat on site.
Galium proliferum	desert bedstraw	None/None/2B.2	None	Joshua tree "woodland", Mojavean desert scrub, Pinyon and juniper woodland; Carbonate, Rocky/annual herb/Mar–June/3,905–5,350	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Githopsis diffusa ssp. *filicaulis*	Mission Canyon bluecup	None/None/3.1	None	Chaparral (disturbed areas, mesic)/annual herb/Apr–June/1,475–2,295	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.

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Grindelia hallii	San Diego gumplant	None/None/1B.2	None	Chaparral, Lower montane coniferous forest, Meadows and seeps, Valley and foothill grassland/perennial herb/May–Oct/605–5,725	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Hesperevax caulescens	hogwallow starfish	None/None/4.2	None	Valley and foothill grassland (mesic clay), Vernal pools (shallow); Alkaline (sometimes)/annual herb/Mar–June/0–1,655	Not expected to occur. No suitable vegetation present.
Hesperocyparis forbesii	Tecate cypress	None/None/1B.1	Covered	Chaparral, Closed-cone coniferous forest; Clay, Gabbroic (sometimes)/perennial evergreen tree/N.A./260–4,920	Not expected to occur. No suitable vegetation present.
Heterotheca sessiliflora ssp. *sessiliflora*	beach goldenaster	None/None/1B.1	None	Chaparral (coastal), Coastal dunes, Coastal scrub/perennial herb/Mar–Dec/0–4,020	Not expected to occur. This species tends to occur along the coast (Calflora 2024).
Hordeum intercedens	vernal barley	None/None/3.2	None	Coastal dunes, Coastal scrub, Valley and foothill grassland (depressions, saline flats), Vernal pools/annual herb/Mar–June/15–3,280	Not expected to occur. No vernally mesic habitat present.
Horkelia truncata	Ramona horkelia	None/None/1B.3	None	Chaparral, Cismontane woodland; Clay, Gabbroic/perennial herb/May–June/1,310–4,265	Not expected to occur. The site is outside of the species' known elevation range.
Hulsea californica	San Diego sunflower	None/None/1B.3	None	Chaparral, Lower montane coniferous forest, Upper montane coniferous forest; Burned areas, Openings/perennial herb/Apr–June/3,000–9,565	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Iva hayesiana	San Diego marsh-elder	None/None/2B.2	None	Marshes and swamps, Playas/perennial herb/Apr–Oct/0–1,640	Not expected to occur. No suitable vegetation present.

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Juglans californica	Southern California black walnut	None/None/4.2	None	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland/perennial deciduous tree/Mar–Aug/165–2,955	Not expected to occur to occur. The site is lacking chaparral and woodland.
Juncus acutus ssp. *leopoldii*	southwestern spiny rush	None/None/4.2	None	Coastal dunes (mesic), Coastal scrub, Marshes and swamps (coastal salt), Meadows and seeps (alkaline seeps)/perennial rhizomatous herb/(Mar)May–June/10–2,955	Not expected to occur. No suitable vegetation on site.
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	None/None/1B.1	None	Marshes and swamps (coastal salt), Playas, Vernal pools/annual herb/Feb–June/5–4,005	Not expected to occur. No suitable vegetation present.
Lathyrus splendens	pride-of-California	None/None/4.3	None	Chaparral/perennial herb/Mar–June/655–5,005	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Lepechinia cardiophylla	heart-leaved pitcher sage	None/None/1B.2	Covered	Chaparral, Cismontane woodland, Closed-cone coniferous forest/perennial shrub/Apr–July/1,705–4,495	Not expected to occur. The site is outside of the species' known elevation range.
Lepechinia ganderi	Gander's pitcher sage	None/None/1B.3	Covered	Chaparral, Closed-cone coniferous forest, Coastal scrub, Valley and foothill grassland; Gabbroic (sometimes)/perennial shrub/June–July/1,000–3,295	Not expected to occur. The site is outside of the species' known elevation range.
Leptosyne maritima	sea dahlia	None/None/2B.2	None	Coastal bluff scrub, Coastal scrub/perennial herb/Mar–May/15–490	Not expected to occur. This species is associated with coastal areas (Calflora 2024).
Lycium californicum	California box-thorn	None/None/4.2	None	Coastal bluff scrub, Coastal scrub/perennial shrub/Mar–Aug(Dec)/15–490	**Low** potential to occur. Suitable coastal scrub habitat is present, but this species generally occurs west of the project site (Calflora 2024).
Mobergia calculiformis	light gray lichen	None/None/3	None	Coastal scrub (?)/crustose lichen (saxicolous)/N.A./35–35	Not expected to occur. The site is outside of the species' known elevation range.

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Monardella breweri ssp. *microcephala*	small-headed monardella	None/None/2B.2	None	Chaparral, Cismontane woodland, Lower montane coniferous forest; Disturbed areas (sometimes), Granitic, Openings/annual herb/May–Aug/755–3,935	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable habitat.
Monardella hypoleuca ssp. *lanata*	felt-leaved monardella	None/None/1B.2	Covered	Chaparral, Cismontane woodland/perennial rhizomatous herb/June–Aug/985–5170	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable habitat.
Monardella viminea	willowy monardella	FE/SE/1B.1	Covered	Chaparral, Coastal scrub, Riparian forest, Riparian scrub, Riparian woodland; Alluvial Terraces, Washes/perennial herb/June–Aug/165–740	Not expected to occur. No suitable alluvial ephemeral washes on site.
Mucronea californica	California spineflower	None/None/4.2	None	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland; Sandy/annual herb/Mar–July (Aug)/0–4,595	**Low** potential to occur. Coastal scrub is present; however, there are no sandy soils.
Myosurus minimus ssp. *apus*	little mousetail	None/None/3.1	None	Valley and foothill grassland, Vernal pools (alkaline)/annual herb/Mar–June/65–2,100	Not expected to occur. No suitable vegetation present.
Nama stenocarpa	mud nama	None/None/2B.2	None	Marshes and swamps (lake margins, riverbanks)/annual/perennial herb/Jan–July/15–1,640	Not expected to occur. No suitable vegetation present.
Navarretia fossalis	spreading navarretia	FT/None/1B.1	Narrow Endemic	Chenopod scrub, Marshes and swamps (shallow freshwater), Playas, Vernal pools/annual herb/Apr–June/100–2,150	Not expected to occur. No suitable vegetation present.
Navarretia prostrata	prostrate vernal pool navarretia	None/None/1B.2	None	Coastal scrub, Meadows and seeps, Valley and foothill grassland (alkaline), Vernal pools; Mesic/annual herb/Apr–July/10–3,970	Not expected to occur. No vernally mesic habitat present.

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Nemacaulis denudata var. *denudata*	coast woolly-heads	None/None/1B.2	None	Coastal dunes/annual herb/Apr–Sep/0–330	Not expected to occur. No suitable vegetation present.
Nemacaulis denudata var. *gracilis*	slender cottonheads	None/None/2B.2	None	Coastal dunes, Desert dunes, Sonoran desert scrub/annual herb/(Mar) Apr–May/-165–1,310	Not expected to occur. No suitable vegetation present.
Ophioglossum californicum	California adder's-tongue	None/None/4.2	None	Chaparral, Valley and foothill grassland, Vernal pools (margins); Mesic/perennial rhizomatous herb/Jan–June(Dec)/195–1,725	Not expected to occur. No suitable vegetation present.
Orcuttia californica	California Orcutt grass	FE/SE/1B.1	Narrow Endemic	Vernal pools/annual herb/Apr–Aug/50–2,165	Not expected to occur. No suitable vegetation present.
Packera ganderi	Gander's ragwort	None/SR/1B.2	Covered	Chaparral (burned areas, gabbroic outcrops)/perennial herb/Apr–June/1,310–3,935	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Phacelia ramosissima var. *austrolitoralis*	south coast branching phacelia	None/None/3.2	None	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt); Rocky (sometimes), Sandy/perennial herb/Mar–Aug/15–985	Not expected to occur. Occurrences are limited to coastal San Diego County (Calflora 2024).
Phacelia stellaris	Brand's star phacelia	None/None/1B.1	None	Coastal dunes, Coastal scrub/annual herb/Mar–June/5–1,310	Not expected to occur. Occurrences are limited to coastal San Diego County (Calflora 2024; CDFW 2024).
Pickeringia montana var. *tomentosa*	woolly chaparral-pea	None/None/4.3	None	Chaparral; Clay, Gabbroic, Granitic/evergreen shrub/May–Aug/0–5,580	Not expected to occur. No suitable vegetation present.
Pinus torreyana ssp. *torreyana*	Torrey pine	None/None/1B.2	Covered	Chaparral, Closed-cone coniferous forest; Sandstone/perennial evergreen tree/N.A./100–525	Not expected to occur. No suitable vegetation present.
Piperia cooperi	chaparral rein orchid	None/None/4.2	None	Chaparral, Cismontane woodland, Valley and foothill grassland/perennial herb/Mar–June/50–5,200	Not expected to occur. No suitable vegetation present.

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Pogogyne abramsii	San Diego mesa mint	FE/SE/1B.1	Narrow Endemic	Vernal pools/annual herb/Mar–July/295–655	Not expected to occur. No suitable vegetation present.
Pogogyne nudiuscula	Otay Mesa mint	FE/SE/1B.1	Narrow Endemic	Vernal pools/annual herb/May–July/295–820	Not expected to occur. No suitable vegetation present.
Quercus cedrosensis	Cedros Island oak	None/None/2B.2	None	Chaparral, Closed-cone coniferous forest, Coastal scrub/perennial evergreen tree/Apr–May/835–3,150	Not expected to occur. The site is outside of the species' known elevation range.
Quercus engelmannii	Engelmann oak	None/None/4.2	None	Chaparral, Cismontane woodland, Riparian woodland, Valley and foothill grassland/perennial deciduous tree/Mar–June/165–4,265	**Low** potential to occur given the geographic range of the species, and lack of suitable vegetation present.
Sidalcea neomexicana	salt spring checkerbloom	None/None/2B.2	None	Chaparral, Coastal scrub, Lower montane coniferous forest, Mojavean desert scrub, Playas; Alkaline, Mesic/perennial herb/Mar–June/50–5,020	Not expected to occur. Suitable coastal scrub habitat is present, but all records are north of SR-52 (Calflora 2024).
Stemodia durantifolia	purple stemodia	None/None/2B.1	None	Sonoran desert scrub (often mesic, sandy)/perennial herb/(Jan)Apr–Dec/590–985	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Stipa diegoensis	San Diego County needle grass	None/None/4.2	None	Chaparral, Coastal scrub; Mesic (often), Rocky/perennial herb/Feb–June/35–2,625	**Low** potential to occur. No suitable rocky or mesic habitat on site.
Streptanthus bernardinus	Laguna Mountains jewelflower	None/None/4.3	None	Chaparral, Lower montane coniferous forest/perennial herb/May–Aug/2,200–8,205	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Suaeda esteroa	estuary seablite	None/None/1B.2	None	Marshes and swamps (coastal salt)/perennial herb/(Jan–May)July–Oct/0–15	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
Suaeda taxifolia	woolly seablite	None/None/4.2	None	Coastal bluff scrub, Coastal dunes, Marshes and swamps (coastal	Not expected to occur. No suitable vegetation present and the site is on the

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				margins)/perennial evergreen shrub/Jan–Dec/0–165	periphery of this species' known elevation range.
Tetracoccus dioicus	Parry's tetracoccus	None/None/1B.2	Covered	Chaparral, Coastal scrub/perennial deciduous shrub/Apr–May/540–3,280	Not expected to occur. Suitable habitat is present, but the site is on the periphery of this species' known elevation range and this species occurs east of El Cajon in southern San Diego County (Calflora 2024).
Texosporium sancti-jacobi	woven-spored lichen	None/None/3	None	Chaparral (openings)/crustose lichen (terricolous)/N.A./195–2,165	Not expected to occur. No suitable vegetation present.
Triquetrella californica	coastal triquetrella	None/None/1B.2	None	Coastal bluff scrub, Coastal scrub/moss/N.A./35–330	Not expected to occur. Suitable habitat is present, but the site is on the periphery of this species' known elevation range. There is only one occurrence in San Diego County near San Vincente Reservoir, approximately 13 miles northeast of the site (Calflora 2024; CDFW 2024).
Xanthisma junceum	rush-like bristleweed	None/None/4.3	None	Chaparral, Coastal scrub/perennial herb/Jan–Oct/785–3,280	Not expected to occur. The site is outside of the species' known elevation range.

Note: MSCP = Multiple Species Conservation Program.
Status Legend
Federal
FE: Federally listed as endangered
FT: Federally listed as threatened
State
SE: State listed as endangered
SR: State listed as rare
CRPR: California Rare Plant Rank
1B: Plants rare, threatened, or endangered in California and elsewhere
2B: Plants rare, threatened, or endangered in California, but more common elsewhere
3: Plants about which more information is needed – A Review List
4: Plants of Limited Distribution – A Watch List
Threat Rank
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 (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

References

Calflora. 2024. Calflora database. Berkeley, California: Calflora. Accessed Sep 2024. https://www.calflora.org/

CDFW (California Department of Fish and Wildlife). 2024. California Natural Diversity Database(CNDDB) RareFind 5.3.0: Commercial Subscription. Sacramento, California: CDFW, Biogeographic Data Branch. Accessed September 2024. https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

Appendix D1

Special-Status Wildlife High or Moderate Potential to Occur

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Reptiles				
Aspidoscelis tigris stejnegeri	San Diegan tiger whiptail	None/SSC	Hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.	**Moderate** potential to occur. Suitable coastal sage scrub habitat on site and ample open areas within coastal sage scrub; however, the areas of suitable habitat are relatively disturbed.
Crotalus ruber	red diamondback rattlesnake	None/SSC	Coastal scrub, chaparral, oak and pine woodlands, rocky grasslands, cultivated areas, and desert flats	**Moderate** potential to occur. Suitable coastal scrub habitat is present on site, but may be too close to urban development to support this species.
Phrynosoma blainvillii	Blainville's horned lizard	None/SSC	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley–foothill hardwood, conifer, riparian, pine–cypress, juniper, and annual grassland habitats	**Moderate** potential to occur. Suitable coastal scrub habitat is present but sandy soils are not present. CNDDB records indicate that this species has been recorded in the immediate vicinity.
Salvadora hexalepis virgultea	coast patch-nosed snake	None/SSC	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	**Moderate** potential to occur. Suitable coastal sage scrub located on site although habitat may be too close to urban development to support this species.
Birds				
Polioptila californica californica	coastal California gnatcatcher	FT/SSC	Nests and forages in various sage scrub communities, often dominated by California sagebrush and buckwheat; generally avoids nesting in areas with a slope of greater than 40%; majority of nesting at less than 1,000 feet above mean sea level	**Moderate** potential to occur. Focused surveys that took place in 2017 for the SDSU New Student Housing Project (which overlaps a portion of the SDSU Evolve Peninsula study area) were negative; however, suitable coastal sage scrub habitat is present on the site, but relatively isolated and located within an urbanized and disturbed environment. Sightings of this species has been reported in proximity of the site (eBird 2024).
Invertebrates				
Bombus crotchii	Crotch's bumble bee	None/SCE	Open grassland and scrub communities supporting suitable floral resources	**Moderate** potential to occur. Suitable scrub habitat is present on site, but lack of floral resources unknown until rare plant surveys are conducted in 2025.

Notes: CNDDB = California Natural Diversity Database; SDSU = San Diego State University.
Status Legend
Federal
FT: Federally listed as threatened
State

SCE: State candidate for listing as endangered
SSC: California Species of Special Concern

References

CDFW (California Department of Fish and Wildlife). 2024. California Natural Diversity Database (CNDDB) RareFind 5.3.0: Commercial Subscription. Sacramento, California: CDFW, Biogeographic Data Branch. Accessed September 2024. https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

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Appendix D2

Special-Status Wildlife Low Potential to Occur

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Amphibians				
Anaxyrus californicus	arroyo toad	FE/SSC	Semi-arid areas near washes, sandy riverbanks, riparian areas, palm oasis, Joshua tree, mixed chaparral and sagebrush; stream channels for breeding (typically third order); adjacent stream terraces and uplands for foraging and wintering	Not expected to occur. No suitable vegetation present. No suitable habitat on site. Drainages on site are fed by urban runoff, covered in thick non-native vegetation, and there are no suitable pools for breeding.
Spea hammondii	western spadefoot	None/SSC	Primarily grassland and vernal pools, but also in ephemeral wetlands that persist at least 3 weeks in chaparral, coastal scrub, valley–foothill woodlands, pastures, and other agriculture	Not expected to occur. No suitable habitat on site. Drainages on site are fed by urban runoff, covered in thick non-native vegetation, and there are no suitable pools for breeding.
Reptiles				
Anniella stebbinsi	southern California legless lizard	None/SSC	Coastal dunes, stabilized dunes, beaches, dry washes, valley–foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and moist sandy or loose, loamy soils	**Low** potential to occur. Suitable moist habitats on site are dominated by non-native species, fed by urban runoff, and are generally unsuitable for this species. No suitable surface objects to hide underneath.
Arizona elegans occidentalis	California glossy snake	None/SSC	Arid scrub, rocky washes, grasslands, chaparral, open areas with loose soil	**Low** potential to occur. Suitable arid scrub habitat is present on the site, but there are no rocky washes or grasslands.
Aspidoscelis hyperythra	orange-throated whiptail	None/WL	Low-elevation coastal scrub, chaparral, and valley–foothill hardwood	**Low** potential to occur. Suitable coastal scrub habitat is on site. One historic record from 1950 occurred in the vicinity of San Diego State University (CDFW 2024).
Chelonia mydas	green sea turtle	FT/None	Shallow waters of lagoons, bays, estuaries, mangroves, eelgrass, and seaweed beds	Not expected to occur. Suitable aquatic habitat is absent from the site.
Coleonyx variegatus abbotti	San Diego banded gecko	None/SSC	Rocky areas within coastal scrub and chaparral	**Low** potential to occur. The site is just outside of this species' known range (Thomson et al. 2016).
Masticophis fuliginosus	Baja California coachwhip	None/SSC	In California restricted to a small area of southern San Diego County limited to about 6 miles north of the Baja California border, where it is known from grassland and coastal sage scrub. Open areas in grassland and coastal sage scrub.	Not expected to occur. The site is outside of this species' known geographic range.
Plestiodon skiltonianus interparietalis	Coronado skink	None/WL	Woodlands, grasslands, pine forests, and chaparral; rocky areas near water	Not expected to occur. There is no woodland, grassland, or forest habitat within the site; drainages on site are fed by urban runoff.

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Thamnophis hammondii	two-striped gartersnake	None/SSC	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	Not expected to occur. No suitable vegetation present. No suitable water bodies found on site; all drainages are ephemeral and fed by urban runoff.
Thamnophis sirtalis ssp.	south coast garter snake	None/SSC	Marsh and upland habitats near permanent water and riparian vegetation	Not expected to occur. Suitable marsh and upland habitat near permanent water is absent from the site.
Birds				
Accipiter cooperii (nesting)	Cooper's hawk	None/WL	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats often near water	**Low** potential to forage. Although there is non-native riparian habitat within the Peninsula Study Area, it is fairly sparse and highly disturbed. May occur as a transient, not expected to nest
Agelaius tricolor (nesting colony)	tricolored blackbird	BCC/SSC, ST	Nests near freshwater, emergent wetland with cattails or tules, but also in Himalayan blackberry; forages in grasslands, woodland, and agriculture	Not expected to occur. No suitable vegetation present. No suitable emergent wetland habitat on site.
Aimophila ruficeps canescens	Southern California rufous-crowned sparrow	None/WL	Nests and forages in open coastal scrub and chaparral with low cover of scattered scrub interspersed with rocky and grassy patches	**Low** potential to occur. Suitable foraging and nesting habitat are present in coastal scrub areas on site.
Ammodramus savannarum (nesting)	grasshopper sparrow	None/SSC	Nests and forages in moderately open grassland with tall forbs or scattered shrubs used for perches	**Low** potential to occur. No suitable grassland habitat on site.
Aquila chrysaetos (nesting and wintering)	golden eagle	None/FP, WL	Nests and winters in hilly, open/semi-open areas, including shrublands, grasslands, pastures, riparian areas, mountainous canyon land, open desert rimrock terrain; nests in large trees and on cliffs in open areas and forages in open habitats	Not expected to occur. No suitable nesting habitat on site. Habitat too urbanized to provide suitable foraging habitat this species.
Artemisiospiza belli belli	Bell's sage sparrow	None/WL	Nests and forages in coastal scrub and dry chaparral; typically in large, unfragmented patches dominated by chamise; nests in more dense patches but uses more open habitat in winter	Not expected to occur. Habitat on site is fragmented. There are no occurrences in proximity to the site (CDFW 2024; eBird 2024).

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Athene cunicularia (burrow sites and some wintering sites)	burrowing owl	BCC/SSC	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	Not expected to occur. The site lacks suitable open areas and grasslands, and is generally too steep to support this species.
Buteo swainsoni (nesting)	Swainson's hawk	None/ST	Nests in open woodland and savanna, riparian, and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields and pasture	Not expected to occur. No suitable grassland habitat for foraging. Does not nest in the region.
Campylorhynchus brunneicapillus sandiegensis (San Diego and Orange Counties only)	coastal cactus wren	None/SSC	Southern cactus scrub patches	**Low** potential to occur. Several *Opuntia* sp. were observed during vegetation mapping, although likely not dense enough to support this species. Site also located in an urbanized setting which may preclude this species' presence.
Charadrius nivosus nivosus (nesting)	western snowy plover	FT, BCC/SSC	On coasts nests on sandy marine and estuarine shores; in the interior nests on sandy, barren or sparsely vegetated flats near saline or alkaline lakes, reservoirs, and ponds	Not expected to occur. No suitable marine or estuarine habitat required for nesting and foraging is present within the site.
Coccyzus americanus occidentalis (nesting)	western yellow-billed cuckoo	FT/SE	Nests in dense, wide riparian woodlands and forest with well-developed understories	Not expected to occur. No suitable riparian woodland or forest habitats found on site.
Coturnicops noveboracensis	yellow rail	BCC/SSC	Nesting requires wet marsh/sedge meadows or coastal marshes with wet soil and shallow, standing water	Not expected to occur. No suitable wet marsh/sedge meadow habitat is found on the site.
Elanus leucurus (nesting)	white-tailed kite	None/FP	Nests in woodland, riparian, and individual trees near open lands; forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands	**Low** potential to forage on site. No suitable open grassland habitats to support extensive foraging or oak stands to support breeding or roosting.
Empidonax traillii extimus (nesting)	southwestern willow flycatcher	FE/SE	Nests in dense riparian habitats along streams, reservoirs, or wetlands; uses variety of riparian and shrubland habitats during migration	Not expected to occur. No suitable riparian woodland or forest habitats found on the site.
Eremophila alpestris actia	California horned lark	None/WL	This subspecies of horned lark occurs on the state's southern and central coastal slope and in the San Joaquin Valley. Nests and forages in grasslands, disturbed lands, agriculture, and beaches.	Not expected to occur. No suitable grasslands or disturbed lands present within the site.

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Falco mexicanus (nesting)	prairie falcon	None/WL	Forages in grassland, savanna, rangeland, agriculture, desert scrub, alpine meadows; nest on cliffs or bluffs	Not expected to occur. Topography of the site is not suitable for nesting and foraging habitat is absent.
Falco peregrinus anatum (nesting)	American peregrine falcon	FPD/SCD	Nests on cliffs, buildings, and bridges; forages in wetlands, riparian, meadows, croplands, especially where waterfowl are present	**Low** potential to occur. Topography of the site is not suitable for nesting. Although this species has been recorded in the vicinity of the campus (eBird 2024), there is no suitable woodland/forest or coastal habitats found on site. Site generally too urbanized to support this species.
Icteria virens (nesting)	yellow-breasted chat	None/SSC	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush	Not expected to occur. No suitable riparian woodlands or thickets found on site. Species would likely be found downstream from the project site in the San Diego River and would likely not be found in project area. Nearest sightings have been recorded at Lake Murray, approximately 2 miles east (eBird 2024).
Ixobrychus exilis (nesting)	least bittern	None/SSC	Nests in freshwater and brackish marshes with dense, tall growth of aquatic and semi-aquatic vegetation	Not expected to occur. No suitable wetland or marsh vegetation found within the site.
Laterallus jamaicensis coturniculus	California black rail	None/FP, ST	Tidal marshes, shallow freshwater margins, wet meadows, and flooded grassy vegetation; suitable habitats are often supplied by canal leakage in Sierra Nevada foothill populations	Not expected to occur. No suitable emergent wetlands found within the site.
Pandion haliaetus (nesting)	osprey	BCC/WL	Large waters (lakes, reservoirs, rivers) supporting fish; usually near forest habitats, but widely observed along the coast	Not expected to occur. Suitable aquatic habitat required for foraging is absent from the site.
Passerculus sandwichensis beldingi	Belding's savannah sparrow	BCC/SE	Nests and forages in coastal saltmarsh dominated by pickleweed (*Salicornia* spp.)	Not expected to occur. No suitable coastal saltmarsh habitat is found within the site.
Pelecanus occidentalis californicus (nesting colonies and communal roosts)	California brown pelican	FPD/SCD	Forages in warm coastal marine and estuarine environments; in California, nests on dry, rocky offshore islands	Not expected to occur. No suitable large water bodies found on site.
Rallus obsoletus levipes	light-footed Ridgway's rail	FE/FP, SE	Coastal wetlands, brackish areas, coastal saline emergent wetlands	Not expected to occur. No suitable emergent wetlands found on site.
Setophaga petechia (nesting)	yellow warbler	None/SSC	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	Not expected to occur. There is a small amount of riparian habitat present on the site, but it is dominated by non-

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
				native species and therefore of poor quality and not likely to support this species.
Sternula antillarum browni (nesting colony)	California least tern	FE/FP, SE	Forages in shallow estuaries and lagoons; nests on sandy beaches or exposed tidal flats	Not expected to occur. No suitable salt ponds or estuarine shores found on site.
Vireo bellii pusillus (nesting)	least Bell's vireo	FE/SE	Nests and forages in low, dense riparian thickets along water or along dry parts of intermittent streams; forages in riparian and adjacent shrubland late in nesting season	Not expected to occur. No suitable willow or riparian habitats found on site. The riparian habitat that is present is dominated by non-native, invasive species that would likely not support this species. Drainages from the project site drain into the San Diego River, where this species is known to occur.
Nannopterum auritum (nesting colony)	double-crested cormorant	None/WL	Nests in riparian trees near ponds, lakes, artificial impoundments, slow-moving rivers, lagoons, estuaries, and open coastlines; winter habitat includes lakes, rivers, and coastal areas	Not expected to occur. Suitable aquatic habitat is absent from the site.
Mammals				
Antrozous pallidus	pallid bat	None/SSC	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in human-made structures and trees	**Low** potential to forage over coastal sage scrub habitat. Not expected to roost on site due to lack of rocky outcrops.
Chaetodipus californicus femoralis	Dulzura pocket mouse	None/SSC	Open habitat, coastal scrub, chaparral, oak woodland, chamise chaparral, mixed-conifer habitats; disturbance specialist; 0 to 3,000 feet above mean sea level	**Low** potential to occur. Suitable coastal sage scrub habitat on site but proximity to urbanization likely excludes this species. Urban-adapted predators are likely abundant throughout the site.
Chaetodipus fallax fallax	northwestern San Diego pocket mouse	None/SSC	Coastal scrub, mixed chaparral, sagebrush, desert wash, desert scrub, desert succulent shrub, pinyon–juniper, and annual grassland	**Low** potential to occur. Suitable coastal sage scrub habitat on site but proximity to urbanization likely excludes this species. Urban-adapted predators are likely abundant throughout the site.
Choeronycteris mexicana	Mexican long-tongued bat	None/SSC	Desert and montane riparian, desert succulent scrub, desert scrub, and pinyon–juniper woodland; roosts in caves, mines, and buildings	Not expected to occur. No suitable habitat for foraging and no suitable caves, mines, abandoned buildings for roosting.

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Corynorhinus townsendii	Townsend's big-eared bat	None/SSC	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, human-made structures, and tunnels	Not expected to occur. No suitable habitat for foraging and no suitable areas for roosting on site.
Euderma maculatum	spotted bat	None/SSC	Foothills, mountains, desert regions of southern California, including arid deserts, grasslands, and mixed-conifer forests; roosts in rock crevices and cliffs; feeds over water and along washes	Not expected to occur. No suitable habitat for foraging on site. No rock crevices or cliffs for roosting found on site
Eumops perotis californicus	western mastiff bat	None/SSC	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	**Low** potential to forage on site over coastal scrub habitat. Not expected to roost on site due to lack of rocky canyons and cliffs.
Lasiurus frantzii	western red bat	None/SSC	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy	**Low** potential to forage on site over coastal scrub habitats. Not expected to roost on site due to high disturbance in the area as well as lack of suitable resources.
Lasiurus *xanthinus*	western yellow bat	None/SSC	Valley–foothill riparian, desert riparian, desert wash, and palm oasis habitats; below 2,000 feet above mean sea level; roosts in riparian and palms	**Low** potential to forage within non-native riparian habitat. Not expected to roost on site due to high disturbance in the area as well as lack of suitable resources.
Lepus californicus bennettii	San Diego black-tailed jackrabbit	None/SSC	Arid habitats with open ground; grasslands, coastal scrub, agriculture, disturbed areas, and rangelands	**Low** potential to occur. No suitable open arid habitats found on site. Presence of urban-adapted predators within project area and the urbanized setting likely excludes this species' presence.
Neotoma lepida intermedia	San Diego desert woodrat	None/SSC	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	**Low** potential to occur. Suitable coastal scrub habitat is present, but the proximity to urban development and urban-adapted predators likely exclude this species from the site.

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
Nyctinomops femorosaccus	pocketed free-tailed bat	None/SSC	Pinyon–juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oases; roosts in high cliffs or rock outcrops with drop-offs, caverns, and buildings	Not expected to occur. No suitable habitats found on site and no suitable high cliffs or rock outcrops for roosting.
Nyctinomops macrotis	big free-tailed bat	None/SSC	Rocky areas; roosts in caves, holes in trees, buildings, and crevices on cliffs and rocky outcrops; forages over water	Not expected to occur. No suitable rugged, rocky canyons on site. Very few records in San Diego.
Perognathus longimembris pacificus	Pacific pocket mouse	FE/SSC	fine-grained sandy substrates in open coastal strand, coastal dunes, and river alluvium	Not expected to occur. No suitable sandy soils for burrowing (soils too cobbly) and no suitable habitat. Project site is located too inland for this species to occur.
Puma concolor	mountain lion - Southern California/Central Coast ESU	None/SC	Scrubs, chaparral, riparian, woodland, and forest; rests in rocky areas and on cliffs and ledges that provide cover; most abundant in riparian areas and brushy stages of most habitats throughout California, except deserts	Not expected to occur. Suitable habitat on site is highly fragmented by the college campus and Interstate 8, just north of the site. Limited large prey availability.
Taxidea taxus	American badger	None/SSC	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils	**Low** potential to occur. Coastal scrub is present, but no suitable sandy soils for burrowing (soils too cobbly) and no suitable open habitats.
Invertebrates				
Branchinecta sandiegonensis	San Diego fairy shrimp	FE/None	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. No vernal pools found on site and no clay duripan soils detected within the site.
Euphydryas editha quino	quino checkerspot butterfly	FE/None	Annual forblands, grassland, open coastal scrub and chaparral; often soils with cryptogamic crusts and fine-textured clay; host plants include Plantago erecta, P. patagonica, and Antirrhinum coulterianum, among others	Not expected to occur. The project site is located outside of the Recommended Quino Survey Area (USFWS 2014).
Lycaena hermes	Hermes copper	FT/None	Mixed woodlands, chaparral, and coastal scrub	**Low** potential to occur. Although *Eriogonum fasciculatum* was identified during vegetation mapping, no *Rhamnus crocea* or *Helianthus gracilentus* were observed. A complete botanical compendium will not be complete until

Scientific Name	Common Name	Status (Federal/State)	Primary Habitat Associations	Potential to Occur
				rare plant surveys are conducted in 2025, but a lack of host plants would preclude this species' presence even though suitable coastal scrub habitat is present on site. The nearest CNDDB record is from 2021, approximately 3.5 miles north of the site.
Streptocephalus woottoni	Riverside fairy shrimp	FE/None	Vernal pools, non-vegetated ephemeral pools	Not expected to occur. No vernal pools found on site and no clay duripan soils detected within the site.
Danaus plexippus plexippus pop. 1	monarch - California overwintering population	FC/None	Wind-protected tree groves with nectar sources and nearby water sources	Not expected to occur. CNDDB occurrences of monarch overwintering populations are limited to coastal areas (CDFW 2024).

Status Legend
Federal
BCC: USFWS—Birds of Conservation Concern
FC: Candidate for federal listing as threatened or endangered
FE: Federally listed as endangered
FPD: Federally proposed for delisting
FT: Federally listed as threatened
State
FP: CDFW Fully Protected species
SCD: State candidate for delisting
SE: State listed as endangered
SSC: California Species of Special Concern
ST: State listed as threatened
WL: CDFW Watch List species

References

CDFW (California Department of Fish and Wildlife). 2024. California Natural Diversity Database(CNDDB). RareFind 5.3.0: Commercial Subscription. Sacramento, California: CDFW, Biogeographic Data Branch. Accessed September 2024. https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

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