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**Subject: Biological Letter Report for 2734 Bordeaux Avenue, La Jolla, CA 92037; APN 344-100-03-00; Prepared for the City of San Diego, PRJ-1087614**

Patrick,

Athena Consulting has prepared this biological letter report to address your project's potential impacts to sensitive biological resources.

## **SUMMARY**

The proposed project (Project) would construct a new 1,110.5-square foot (gross floor area) detached accessory dwelling unit (ADU) behind the existing single-family residence on this property. The eastern side of the Project site (Site) supports Developed land and Disturbed land, while the western portion is vegetated with sensitive Diegan Coastal Sage Scrub. Three sensitive species were found in the Coastal Sage Scrub: coast barrel cactus (*Ferocactus viridescens*), California desert thorn (*Lycium californicum*) and Torrey pine (*Pinus torreyana*). The two pines were probably planted. Another sensitive species has high potential to occur in or use the Coastal Sage Scrub: coastal California gnatcatcher (*Polioptila californica californica*). A protocol survey for Crotch's bumble bee (*Bombus crotchii*) was conducted in August 2024 and no Crotch's bumble bees were found. The Project would only impact Developed and Disturbed land in the eastern side of the Site. This impact would not be considered significant. No impacts to sensitive plants or animals are expected to occur. The western 0.62 acre of the Site would be preserved with a Covenant of Easement. No mitigation for impacts to biological resources would be required.

## **INTRODUCTION**

### **Project Description**

The Project would construct a new 1,190-square-foot detached accessory dwelling unit (ADU) under a Coastal Development Permit and Site Development Permit. Proposed Site improvements include an on-grade path, landscaping, drainage features, and grading. The ADU plan features a single-story structure with a roof garden over a basement. Drainage would be routed into a new drainage ditch terminating in a rock riprap dissipater just downslope of the ADU. Brush

Management Zone (BMZ) 1 would extend 10 feet outward from the ADU structure, which would use alternative compliance for fire safety. A Covenant of Easement (COE) that was originally specified in the 2001 Mitigated Negative Declaration for the existing residence would be recorded and would cover 0.62 acre in the western portion of the site. BMZ 1 would be outside and east of the COE, while BMZ 2 (which is considered impact neutral) would extend another 65 feet from Zone 1 and would overlap the COE. The existing single-family residence would remain as is. The ADU and Site improvements are all located outside of the COE area and within the previously disturbed/graded portion of the Site, resulting in no encroachment and no impact to environmentally sensitive lands.

## **Project Location and Setting**

### ***Location***

The 0.91-acre Site is in coastal San Diego County, in the City of San Diego and community of La Jolla, approximately 0.9 mile west of Interstate 5 and 0.4 mile east of the Pacific Ocean, on Assessor's Parcel Number (APN) 344-100-03-00 (**Figures 1 and 2**). The street address is 2734 Bordeaux Avenue, La Jolla, CA 92037. The Site is bordered by single-family residential parcels to the northeast and southwest, Bordeaux Avenue and more residential development to the east and south, University of California conserved land to the north of the western half, and Scripps Institution of Oceanography to the west. The property is within the City of San Diego Multiple Species Conservation Program (MSCP) but is not within or adjacent to the MSCP's Multi-Habitat Planning Area (MHPA). The closest MHPA is mapped approximately 0.4 mile north, at the Scripps Coastal Reserve (**Figure 3**). Satellite imagery of the Site and surroundings is provided in **Figure 4**.

## **REGULATORY SETTING**

The property is within the City of San Diego. Multiple federal, State, and local laws and regulations protect and conserve biological resources. Major regulations that apply to the Project are summarized below.

### **Federal Endangered Species Act**

The U.S. Congress passed the 1973 federal Endangered Species Act (ESA) (and later amendments) to protect and recover imperiled species and the ecosystems upon which they depend. The federal ESA has four major components: 1) Section 4, which provides for listing species and designating critical habitat; 2) Section 7, which requires federal agencies, in consultation with the USFWS, to ensure that their actions are not likely to jeopardize the continued existence of species or result in the modification or destruction of critical habitat; 3) Section 9, which prohibits "taking" of listed species; and 4) Section 10, which provides for permitting incidental take of listed species. Under the ESA, to "take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. A project that does or may support a species protected by the federal ESA may be subject to federal ESA regulation.

### **California Endangered Species Act**

The California Endangered Species Act (CESA) of 1984 generally parallels the main provisions of the federal ESA and is administered by the California Department of Fish and Wildlife (CDFW); it prohibits take of any species that CDFW has classified as Threatened or Endangered, or that is experiencing a significant decline that could lead to such as designation, and permits take incidental to otherwise lawful development projects with approval from CDFW.

### **California Environmental Quality Act**

The California Environmental Quality Act, or CEQA, is a statute first created in 1970 that requires State and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. Every development project that requires a discretionary governmental approval requires at least some environmental review pursuant to CEQA, unless an exemption applies. CEQA does not specifically define what constitutes an “adverse effect” on a biological resource; instead, lead agencies are charged with determining what should be considered a significant impact, according to the CEQA Guidelines. The City of San Diego is the lead agency for this Project.

### **Natural Communities Conservation Planning Act**

The State of California’s Natural Communities Conservation Planning (NCCP) Act of 1991 and 2003 is intended to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by species’ listings by focusing on the long-term stability of wildlife and plant communities and including key interests in the process.

### **Migratory Bird Treaty Act**

The Migratory Bird Treaty Act (MBTA) of 1918 (and later amendments) was passed by Congress to provide protection to the breeding activities of migratory birds throughout the United States. The MBTA makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts (including feathers), nests, or eggs of such a bird except under the terms of a valid federal permit. All birds in California except those specifically excluded (such as non-native birds and certain “game” birds) are protected by this act. *Note: nesting birds may be present during construction and are protected under the MBTA as well as Fish and Game Code.*

### **Clean Water Act**

The 1972 Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating surface water quality standards. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters of the United States unless a permit was obtained. Under Section 404 of the CWA, the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged and/or fill material into “Waters of the U.S.”

### **California Fish and Game Code**

California Fish and Game Code regulates the taking and possession of birds, mammals, fish, amphibians, and reptiles, as well as impacts to natural resources such as Waters of the State. It includes the CESA described above, Lake and Streambed Alteration (LSA) Agreement regulations (Sections 1600-1616), provisions for legal hunting and fishing, tribal agreements for activities involving take of native wildlife, protection of nests and eggs of all birds except as otherwise provided by Fish and Game Code (Section 3503), protection of all raptors and their nests and eggs except as otherwise provided (Section 3503.5), and the California Native Plant Protection Act (Section 1900-1913). *Note: nesting birds may be present during construction and are protected under Fish and Game Code as well as the MBTA.*

### **California Native Plant Protection Act**

The California Native Plant Protection Act of 1977 directed CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and endangered plants in this State" and gave CDFW the power to designate native plants as Endangered or Rare and to protect such designated plants from take.

### **Porter-Cologne Water Quality Control Act**

The Porter-Cologne Water Quality Control Act protects State wetlands and Waters of the State. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) are the principal State agencies with primary responsibility for the coordination and control of water quality. Waters of the State are defined in this act as "any surface water or groundwater, including saline waters, within the boundaries of the state." State wetlands are defined in the "State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State." The Project is also subject to the San Diego RWQCB adopted Order R9-2013-0001, NPDES CAS0109266, National Pollutant Discharge Elimination Systems (NPDES) Permit Waste Discharge Requirements for Discharges from the Municipal System (MS4s) Draining the Watersheds within the San Diego Region.

### **California Coastal Commission and Coastal Act**

In response to 1972 federal coastal zone management legislation, which encouraged and funded states to implement responsible coastal zone management, the State of California established the California Coastal Commission in 1972 and adopted the California Coastal Act in 1976. The Coastal Commission, in partnership with coastal cities and counties, regulates the use of land and water in the coastal zone. Development in the coastal zone generally requires a permit from either the Coastal Commission or the local government. The Coastal Act includes specific policies that address, among other things, shoreline public access and recreation, terrestrial and marine habitat protection, water quality, and development design. The Project is within the City of San Diego Coastal Overlay Zone.

### **Multiple Species Conservation Program**

The 1998 Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for a 900-square-mile area in southwest San Diego County. It allows local jurisdictions to plan regional preserve systems while maintaining land use control and providing

development flexibility. Local jurisdictions implement their own Subarea Plans. The City of San Diego's Subarea Plan (1997) covered approximately 206,124 acres at the time it was created in 1997, and its hardline preserve Multi-Habitat Planning Area (MHPA) covers approximately 47,910 acres. The property is not within or adjacent to the City's Multi-Habitat Planning Area (MHPA) preserve.

### **City of San Diego Land Development Code Biology Guidelines**

The Land Development Code Biology Guidelines were formulated by the City of San Diego Development Services Department to help implement the City's Environmentally Sensitive Lands Regulation, Land Development Code, and Open Space Residential Zone Code, and to guide determination of impacts and mitigation under CEQA and the Coastal Act (City of San Diego 2018a). The Biology Guidelines specifically guide protection for sensitive biological resources including those lands included within the MHPA as identified in the City of San Diego's MSCP Subarea Plan (City of San Diego 1995) and the Vernal Pool Habitat Conservation Plan (VPHCP) (City of San Diego 2019), and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA or IIIB; habitat for rare, Endangered or Threatened species; or Narrow Endemic species.

### **City of San Diego Environmentally Sensitive Lands Regulations**

The Land Development Code contains restrictions on development within Environmentally Sensitive Lands (ESL). ESL regulations (City of San Diego 2018b) are intended to "protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of species supported by those lands." These regulations are intended to assure that development, including, but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

Within the Coastal Overlay Zone, steep hillsides should be preserved in their natural state, and development on steep hillsides with sensitive biological resources should avoid encroachment into such steep hillsides to the maximum extent possible (City of San Diego 2022). Encroachment in this context is defined as "any area of 25 percent or greater slope in which the natural landform is altered by grading, is rendered incapable of supporting vegetation due to the displacement required for the building, accessory structures, or paving, or is cleared of vegetation (including Zone 1 brush management)" (City of San Diego 2022).

### **City of San Diego Community Planning**

The property is in the La Jolla Community Plan area and the La Jolla Shores Planned District. According to the ESL regulations, "All development on steep hillsides located in La Jolla or La Jolla Shores Community Plan areas, shall, in addition to meeting all other requirements of this section [143.0142], be found consistent with the Hillside Development Guidelines set forth in the La Jolla – La Jolla Shores Local Coastal Program land use plan." Those Hillside Development Guidelines

include a requirement for environmental analysis for all structures proposed on hillsides containing sensitive biological resources, in accordance with the requirements of the California Environmental Quality Act, and protection of environmentally sensitive habitats to the greatest extent possible (City of San Diego 2014).

**METHODS AND SURVEY LIMITATIONS**

Biological resources on the Site were investigated through records review and a biological Site survey. Records review consisted of a search of California Natural Diversity Database (CNDDDB) documentation of sensitive plant and animal species within the Project’s La Jolla U.S. Geological Survey (USGS) 7.5-minute quadrangle and adjacent Del Mar quadrangle, satellite imagery (Google Earth 2024), soil mapping (USDA 2024), and the 2001 Mitigated Negative Declaration for demolition of the original residence and construction of the current residence.

A general biological survey was conducted by me, Athena Senior Biologist and Botanist Catherine MacGregor, on June 8, 2023 (see **Attachment A** for my resume). The survey consisted of walking through the Site; documenting habitats, plants, and animals; and assessing potential for sensitive species to occur onsite. Site survey times and conditions are provided in Table 1, below. Three more surveys for Crotch’s bumble bee conducted in 2024 and a general biological update survey conducted in 2025 are also included in Table 1, below.

**Table 1. Site Survey Times and Conditions**

Date	Time	Temp (°F)	Sky	Wind (MPH)	Survey Type	Personnel
6/8/2023	0838 to 1032	64-65	100% cloud cover	0-3	General biological	C. MacGregor
7/29/2024	1415 to 1530	70-71	10% cloud cover	2-4	Crotch’s bumble bee hab. assess. and survey 1	D. Busby
8/12/2024	1245 to 1345	78	1-10% cloud cover	2-4	Crotch’s bumble bee survey 2	D. Busby
8/26/2024	1110 to 1210	74-75	0% cloud cover	3-5	Crotch’s bumble bee survey 3	D. Busby
11/5/2025	0900 to 1028	64-66	0% cloud cover	1-3 to 3-5	General biological update	C. MacGregor

The general survey effectiveness is assumed to be limited for early spring-blooming herbs, late summer-blooming herbs, strictly crepuscular or nocturnal wildlife, and small mammals and herpetofauna that require trapping for detection.

**SURVEY RESULTS**

**Physical Characteristics**

***Existing Land Use***

The Site currently supports the existing residence, hardscape, landscaping, non-native vegetation, and an area of native habitat. Photographs of the Site are provided in **Attachment B**.

### ***Topography, Geology, and Soils***

The Site is located on a generally west-facing slope of a marine terrace, although a minor ravine running roughly east to west forms some south-facing and north-facing slope areas. Elevation ranges from approximately 363 feet above mean sea level at the eastern corner at Bordeaux Avenue to approximately 231 feet in the southwestern corner. The Site beyond the existing residence is steeply sloping.

Soil in the eastern side of the Site, primarily under the existing structures, is mapped as Chesterton fine sandy loam, 5 to 9 percent slopes (CfC) (USDA 2024). The Chesterton series consists of moderately well drained fine sandy loams that have a sandy clay subsoil. These soils formed in material weathered in place from soft ferruginous sandstone. CfC occurs on coastal ridges and is moderately sloping (USDA 1973).

The rest of the Site is Terrace Escarpments (TeF) (USDA 2024). TeF consists of steep to very steep escarpments and escarpment-like landscapes that occur on the fronts of terraces or alluvial fans. There is usually four to ten inches of loamy or gravelly soil over soft marine sandstone, shale, or gravelly sediments (USDA 1973).

### ***Wetlands and Water Resources***

No jurisdictional drainages or wetlands were observed on the Site. A blueline drainage occurs offsite to the west in the bottom of the canyon.

### ***Sensitive Lands and Critical Habitats***

Sensitive lands include those lands within the MHPA as identified in the City of San Diego's MSCP Subarea Plan and the VPHCP, and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA or IIIB; habitat for rare, Endangered or Threatened species; or Narrow Endemic species (City of San Diego 2018a).

The Site is not within or adjacent to the MHPA. Because the property is not adjacent to the MHPA, Land Use Adjacency Guidelines are not applicable. No vernal pools or similar ephemeral ponding areas were found onsite. One sensitive habitat type, Tier II Coastal Sage Scrub, is present onsite. More information on the Coastal Sage Scrub is provided below. Two sensitive species were found onsite (California desert thorn and Torrey pine), but neither is Endangered, Threatened, or Narrow Endemic (see discussion below). One federal Threatened species, coastal California gnatcatcher, has high potential to occur in the western part of the Site (see discussion below).

## Biological Resources

### ***Botanical Resources – Flora***

Approximately 83 plant taxa (38 native and 45 non-native) were found onsite in the three habitat/land cover categories. Dominant or characteristic species of each category are included in habitat descriptions below. Habitat/land cover names are capitalized when they are formal Oberbauer et al. (2008) categories, following the convention of the Oberbauer document. Each of these categories is shown in **Figure 5** and described below. Plants observed on the Site are listed in **Attachment C**.

#### Developed (Habitat Code 12000, no Tier), 0.26 Acre

Developed or Urban/Developed land consists of areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, and landscaping. Areas where no natural land is evident due to a large amount of debris or other materials being placed upon it may also be considered urban/developed (e.g. car recycling plant, quarry). (Oberbauer et al. 2008)

Developed land onsite consists of the residence including rear patio terraces, and the portion of the upper slope immediately west of the residential structure that has been altered with reinforcing concrete blocks, retaining walls, drains, and ornamental plantings. Vegetation in the Developed area is characterized by ornamental non-native species. The Developed upper slope plantings are dominated by Cape honeysuckle (*Tecoma capensis*) with acacia (*Acacia* sp.), Brazilian pepper (*Schinus terebinthifolius*), ivy (*Hedera* sp.), lavender (*Lavandula* sp.), and a few native shrubs such as toyon (*Heteromeles arbutifolia*) and laurel sumac (*Malosma laurina*). Photographs 1, 2, 3, and 5 show Developed land onsite.

#### Disturbed (Habitat Code 11300, Tier IV), 0.10 Acre

Disturbed land consists of areas that have been physically disturbed and are no longer recognizable as native or naturalized vegetation but continues 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 that take advantage of disturbance or shows signs of past or present animal usage that removes any capability of providing viable natural habitat for uses other than dispersal. Characteristic species include invasive non-native forbs such as sow thistle (*Sonchus* spp.), tocalote or star thistle (*Centaurea* spp.), Russian-thistle (*Salsola* spp.), radish (*Raphanus* spp.), ice plant (*Carpobrotus* spp.), chrysanthemum-type daisies (*Glebionis* spp.), and fennel (*Foeniculum vulgare*), and annual grasses do not dominate the vegetative cover. (Oberbauer et al. 2008)

The portion of the Site between the Developed upper slope with structural reinforcement and the natural habitat to the west is classified as Disturbed because it is dominated by ice plant with other non-natives such as acacia, eucalyptus (*Eucalyptus* spp.), ngaio (*Myoporum laetum*), bloodflower

milkweed (*Asclepias curassavica*), and purple false-brome (*Brachypodium distachyon*), with a few native plants from the adjacent habitat. Photographs 4, 5, and 6 show Disturbed onsite.

#### Diegan Coastal Sage Scrub (Habitat Code 32500, Tier II), 0.55 Acre

Diegan Coastal Sage Scrub is characterized by low, soft-woody subshrubs that are most active in winter and early spring, and many taxa are drought deciduous. The dominant species are coastal sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) with laurel sumac (*Malosma laurina*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*). Stem- and leaf-succulents may be present but are not as conspicuous as in Maritime Succulent Scrub. (Oberbauer et al. 2008)

This native habitat covers the western portion of the Site and is generally in good condition. Dominant plants observed during the Site survey were coastal sagebrush, California buckwheat, California encelia (*Encelia californica*), lemonadeberry (*Rhus integrifolia*), and deerweed (*Acmispon glaber*). Other native components included black sage, prickly pear (*Opuntia* sp.), monkey flower (*Diplacus* sp.), ladies' fingers (*Dudleya edulis*), chalk lettuce (*Dudleya pulverulenta*), Nuttall's snapdragon (*Antirrhinum nuttallianum*), coffee fern (*Pellaea andromedifolia*), wreath plant (*Stephanomeria* sp.), coast range melic (*Melica imperfecta*), and foothill needle grass (*Stipa lepida*). Several succulent species were observed, but not enough to characterize this area as Maritime Succulent Scrub. Photographs 7, 8, and 9 show Coastal Sage Scrub onsite.

#### **Zoological Resources – Fauna**

All animals observed onsite are listed in **Appendix D**. Animals observed in the Developed area included western honeybee (*Apis mellifera*), Anna's hummingbird (*Calypte anna*), hooded oriole (*Icterus cucullatus*), and house wren (*Troglodytes aedon*).

Animals observed in Disturbed land vegetation consisted of house finch (*Haemorhous mexicanus*) and house wren.

Animals observed in Diegan Coastal Sage Scrub included yellow-faced bumble bee (*Bombus vosnesenskii*), wrentit (*Chamaea fasciata*), song sparrow (*Melospiza melodia*), California towhee (*Melospiza crissalis*), and spotted towhee (*Pipilo maculata*). Scat of coyote (*Canis latrans*) and rabbit (*Sylvilagus* sp.) was also observed.

#### **Rare, Threatened, Endangered, Endemic and/or Vernal Pool Sensitive Species or MSCP-covered Species**

For the purposes of this report, a sensitive plant or animal is any species, subspecies, or variety (taxon) that is officially listed by the State of California or the federal government as Endangered, Threatened, or Rare, or a candidate for one of those listings; classified as Fully Protected, Species of Special Concern, or Watch List by CDFW; included in California Rare Plant Ranks (CRPR) 1 through 4; covered by the MSCP; or included in the City of San Diego Narrow Endemics or VPHCP lists. A

table of sensitive plant taxa with CNDDDB records in the La Jolla and Del Mar quadrangles is provided in **Attachment E**, with evaluations of the potential for each taxon to occur onsite. A table of sensitive animal taxa with CNDDDB records in the La Jolla and Del Mar quadrangles, with evaluations of the potential for each taxon to occur onsite, is provided in **Attachment F**.

### Sensitive Species Observed Onsite

Three sensitive species were observed onsite:

**Coast barrel cactus** (*Ferocactus viridescens*, Cactaceae) is a perennial stem succulent that grows on hot, sunny slopes in southwestern San Diego County. It has a CRPR of 2B.1, indicating that it is rare, threatened or endangered in California, but more common elsewhere; and seriously endangered in California with over 80% of occurrences threatened with a high degree and immediacy of threat. Coast barrel cactus was reported to occur in the western onsite Coastal Sage Scrub in the 2001 Mitigated Negative Declaration, but was not observed during the 2023 survey; however, it can be difficult to find if overgrown by nearby shrubs. During the November 2025 survey, approximately seven individuals were found under shrubs that had lost most of their leaves for the dry season. An eighth was found under a shrub a short distance to the north.

**California desert thorn** (*Lycium californicum*, Solanaceae) is a succulent-leaved shrub that grows in coastal bluff scrub and coastal sage scrub. This species has a CRPR of 4.2. CRPR 4 is the least sensitive rank, a watch list for plants of limited distribution. Within CRPR 4, the 0.2 indicates a moderate level of threat. A single individual, partially overgrown by nearby shrubs, was observed in the Coastal Sage Scrub onsite (Photograph 10). Others could be present but difficult to see if also overgrown.

**Torrey pine** (*Pinus torreyana* subs. *torreyana*, Pinaceae) is a very rare pine that generally grows on dry sandstone slopes in Torrey Pine Forest or Maritime Chaparral. This species has no State or federal listing, primarily because the remaining natural population is already adequately conserved. It has a CRPR of 1B.2, indicating that it is rare, threatened or endangered in California and elsewhere, and moderately threatened in California. Two individuals were observed onsite. A medium-size Torrey pine was growing in the eastern Coastal Sage Scrub near the Disturbed land (Photograph 11). A smaller, unhealthy individual was observed nearby, near the northern property boundary (Photograph 12). Because these two trees are both relatively small and near the residential landscaping and old irrigation, it is likely that they were both planted.

### Sensitive Species with Potential to Occur Onsite

A list of sensitive plants and animals known to occur within the Site's U.S. Geological Survey 7.5-minute quadrangle (La Jolla) and adjacent quadrangle to the north (Del Mar) was generated from the CNDDDB RareFind5 database. Mapping of the search results was reviewed in CDFW's BIOS viewer.

According to the CNDDDB records, several sensitive species have been documented near the Site. A large polygon for coastal California gnatcatcher covers the undeveloped portion of the Site, the adjacent canyon, the open space to the north, and part of the Scripps campus. A polygon for Nuttall's scrub oak (*Quercus dumosa*) on the parcels to the east and north just touches the northern edge of the Site. A polygon of Southern Maritime Chaparral and overlapping polygon of wart-stemmed ceanothus (*Ceanothus verrucosus*) occur to the north of the Site on the University of California open space parcel. A polygon of coast barrel cactus occurs across the canyon on the Scripps property, and two more are located to the southwest. A short-leaved dudleya (*Dudleya brevifolia*) polygon is located approximately 0.14 mile north near the head of the canyon.

Of these species, Nuttall's scrub oak and wart-stemmed ceanothus would have been detectable and were not found onsite. Southern maritime chaparral habitat is not present onsite, although one chamise (*Adenostoma fasciculata*) observed onsite near the northern boundary indicated it is likely present nearby. Short-leaved dudleya is unlikely to occur onsite because the Site lacks suitable pebbly openings. However, **Coastal California gnatcatcher has high potential** to use the Coastal Sage Scrub onsite for foraging and nesting.

Of the other CNDDDB records listed for the La Jolla and Del Mar quadrangles in **Attachments E and F**, Cooper's hawk (*Accipiter cooperii*) has moderate potential to perch in the eucalyptus trees on and near the Site, but only low potential to nest in them because they are close to the homes. Orange-throated whiptail (*Aspidoscelis hyperythra*) and coastal whiptail (*Aspidoscelis tigris stejnegeri*) have moderate potential to occur onsite due to presence of suitable habitat; and Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) has moderate potential to occur onsite because it is somewhat widespread, documented nearby, and would have been difficult to detect during the June survey. These species would only use the Coastal Sage Scrub habitat, and because the Coastal Sage Scrub would not be impacted, additional focused surveys would not be necessary.

Crotch's bumble bee, also listed in **Attachment F**, was judged to have moderate potential to use onsite habitat, and a focused protocol survey series was conducted in August 2024. The survey report is provided in **Attachment G**. Areas determined to be suitable for Crotch's bumble bee foraging consisted of the Disturbed land because it included several nectar sources and the Diegan Coastal Sage Scrub because it contained several native nectar sources. No Crotch's bumble bees were observed in the survey area on or adjacent to the Site. No nesting sites or potential overwintering sites were observed during the surveys.

No other sensitive species are expected to occur onsite.

#### City of San Diego Narrow Endemic and Vernal Pool Species

Eleven plant species are considered Narrow Endemic species because of their limited distribution within the region and are considered sensitive biological resources of special importance to the City. Information about whether each species was observed and why it would or would not be expected to occur onsite is provided in Table 2, below.

**Table 2. Narrow Endemics and Potential to Occur on the Project Site**

Scientific Name	Common Name	Observed Onsite	Rationale to Expect or Not Expect Onsite
<i>Acanthomintha ilicifolia</i>	San Diego thornmint	No	Not expected; not observed, no suitable clay soil.
<i>Agave shawii</i> var. <i>shawii</i>	Shaw's agave	No	Not expected; would have been visible and was not observed.
<i>Ambrosia pumila</i>	San Diego ambrosia	No	Not expected; not observed and no suitable habitat observed.
<i>Aphanisma blitoides</i>	Aphanisma	No	Not expected; would have been visible and was not observed.
<i>Astragalus tener</i> var. <i>titi</i>	Coastal dune milkvetch	No	Not expected; not observed, no suitable habitat observed.
<i>Baccharis vanessae</i>	Encinitas baccharis	No	Not expected; would have been visible and was not observed.
<i>Brodiaea filifolia</i>	Thread-leaf brodiaea	No	Not expected; not observed, no suitable soils or habitat observed.
<i>Cylindropuntia californica</i> var. <i>californica</i>	Snake cholla	No	Not expected; would have been visible and was not observed.
<i>Deinandra conjugens</i>	Otay tarplant	No	Not expected; not observed, no suitable soil.
<i>Dudleya brevifolia</i>	Short-leaf dudleya	No	Not expected; not observed, no suitable microhabitat observed.
<i>Dudleya variegata</i>	Variegated dudleya	No	Not expected; not observed, no suitable microhabitat observed.
<i>Eryngium aristulatum</i>	San Diego button-celery	No	Not expected; not observed, no suitable vernal pools or similar.
<i>Navarretia fossalis</i>	Spreading navarretia	No	Not expected; not observed, no suitable vernal pools or similar.
<i>Orcuttia californica</i>	California Orcutt's grass	No	Not expected; not observed, no suitable vernal pools or similar.
<i>Pogogyne abramsii</i>	San Diego mesa mint	No	Not expected; not observed, no suitable vernal pools or similar.
<i>Pogogyne nudiuscula</i>	Otay mesa mint	No	Not expected; not observed, no suitable vernal pools or similar.

Five plant and two animal species have been identified as vernal pool sensitive biological resources in the City of San Diego Vernal Pool Habitat Conservation Plan (VPHCP). Information about whether each species was observed and why it would or would not be expected to occur onsite is provided in Table 3, below.

**Table 3. Vernal Pool Species Potential to Occur on the Project Site**

Scientific Name	Common Name	Observed Onsite	Rationale to Expect or Not Expect Onsite
<i>Eryngium aristulatum</i>	San Diego button-celery	No	Not expected; no vernal pools or similar onsite.
<i>Navarretia fossalis</i>	Spreading navarretia	No	Not expected; no vernal pools or similar onsite.
<i>Orcuttia californica</i>	California Orcutt's grass	No	Not expected; no vernal pools or similar onsite.

Scientific Name	Common Name	Observed Onsite	Rationale to Expect or Not Expect Onsite
<i>Pogogyne abramsii</i>	San Diego mesa mint	No	Not expected; no vernal pools or similar onsite.
<i>Pogogyne nudiuscula</i>	Otay mesa mint	No	Not expected; no vernal pools or similar onsite.
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	No	Not expected; no vernal pools or similar onsite.
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	No	Not expected; no vernal pools or similar onsite.

## PROJECT IMPACT ANALYSIS

The City of San Diego significance thresholds for direct impacts to sensitive habitats (Tier I-IIIb) are provided here, verbatim:

### Biology Significance Determination

#### 1. Direct Impacts

The direct, indirect and cumulative impacts of a project must be analyzed for significance. The first step in making the determination is to identify the nature of the impact, and the extent, and degree of direct impacts to biological resources. A direct impact is a physical change in the environment which is caused by and immediately related to the project. An example of a direct physical change in the environment is the removal of vegetation due to brushing, grubbing, grading, trenching, and excavating.

In order to determine the extent of impacts, the acreage of each habitat type to be lost should be quantified. If an upland, categorize the land into one of the four Tier categories (I -IV), which are listed on Table 3 of the Biology Guidelines. If a natural wetland, categorize as indicated on Tables 2a and/or 2b of the Biology Guidelines. In addition, the boundaries of the MHPA should be determined and any proposed encroachment should be quantified. Where possible, the extent or number of individuals of sensitive, threatened, rare, or endangered species to be taken or harassed should also be quantified. In order to determine the degree of the impact, fragmentation of habitat, loss of foraging area for sensitive species, and other factors should be considered.

The City's permit to 'take' Covered Species under the MSCP is based on the concept that 90% of lands within the MHPA will be preserved. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would be considered significant and require a boundary line adjustment which would include a habitat equivalency assessment to ensure that what will be added to the MHPA is at least equivalent to what would be removed.

In addition, lands containing Tier I, II, IIIa and IIIb [see Table 3 of City's Biology Guidelines] and all wetlands [see Tables 2a and/or 2b of City's Biology Guidelines] are considered

sensitive and declining habitats. As such, impacts to these resources may be considered significant. Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant.

Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to state or federally listed species and all narrow endemics [see the City's Biology Guidelines] should be considered significant. Certain species covered by the MSCP [see Section I of the Biology Guidelines] and other species not covered by the MSCP, may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

Notes:

- (a) Total upland impacts (Tiers I- III B) less than 0.1 acre are not considered significant and do not require mitigation. See Section 3 (Cumulative Impacts) relative to native grasslands.
- (b) Impacts to non-native grasslands totaling less than 1.0 acres which are completely surrounded by existing urban developments are not considered significant and do not require mitigation. Examples may include urban infill lots.
- (c) Total wetland impacts less than 0.01 acre are not considered significant and do not require mitigation. THIS DOES NOT APPLY TO VERNAL POOLS or wetlands within the Coastal Zone.
- (d) Brush Management Zone 2 thinning activities, while having the potential to adversely affect biological resources, are not considered potentially significant inside the MHPA or, to the extent that non-covered species are not impacted, outside the MHPA, because of the implementation of the MSCP. Brush Management Zone 2 thinning outside the MHPA which affects non-covered species is potentially significant. Brush management not conducted in accordance with brush management regulations, regardless of where it is located, is also potentially significant.
- (d) Mitigation is not required for impacts to non-native grassland habitat when impacted for the purpose of wetland or other native habitat creation.
- (e) Habitat mitigation is not required for impacts to manufactured slopes or areas that have been planted with native species for the purpose of erosion control. For example, in order to qualify for this exception, substantiation of previous permits and mitigation must be provided. Noise mitigation, however, may be required for significant noise impacts to certain avian species during their breeding season depending upon the location of the slope (such as adjacent to an MHPA) and what birds may be present in the area such as the California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird, western snowy plover, or burrowing owl. If these avian species (except for the California gnatcatcher) are present, then mitigation will be required if construction or operational noise levels would exceed 60 db(A), or the existing ambient noise level if already above 60db(A) during the breeding season. For California gnatcatcher habitat within the MHPA and occupied, construction or operational noise levels exceeding 60 dB(A) (or exceeding the existing ambient noise level if already above

60 dB(A)) during the breeding season is considered significant. There are no restrictions for the gnatcatcher **outside** the MHPA anytime of the year.

In addition, inside the MHPA, impact avoidance areas are required for Cooper’s hawk, northern harrier, golden eagle, burrowing owl, and southwestern pond turtle. See Biology Guidelines, Section II, A. 2 & 4, and Section 9.12 of the Implementing Agreement.

- (f) Removal/control of non-native plants is not considered to constitute a significant habitat impact for which compensatory habitat acquisition, preservation, or creation for the area impacted is required. Mitigation for indirect impacts such as erosion control or off-site infestation by non-native species may be needed.

An indirect impact is a physical change in the environment that is not immediately related to the project, but which is caused indirectly by the project. If a direct impact in turn causes another physical change in the environment, then the secondary change is an indirect impact. Examples include introduction of urban meso-predators and invasive non-native plants into a biological system; introduction of urban runoff into a biological system; noise and lighting impacts (both construction/demolition and operational phases of the project); alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles; and loss of a wetland buffer that includes no environmentally sensitive lands.

Cumulative impacts occur as a result of ongoing direct and indirect impacts for unrelated projects within a geographic area and are assessed on a regional basis to determine the overall effect of numerous activities on a sensitive resource over a larger area.

**Direct Impacts**

Direct impacts would result from construction of the ADU and its 10-foot BMZ 1, as shown in **Figure 6**. In addition, any area not conserved within the COE would be considered impacted. The new Project impact area extends from the western edge of the existing residence to the eastern edge of the COE. A detail of proposed disturbance areas and features is provided in **Attachment H** The limits of impacts are entirely within the Developed and Disturbed land. The associated drainage improvements, a drainage ditch and a rock riprap dissipater, are also entirely within the Developed and Disturbed areas. Impact acreages are summarized in Table 4, below.

**Table 4 Habitat/Land Cover Impact Acreages**

Habitat / Land Cover Category	Existing Onsite (AC)	Preserved in COE (AC)	New Impact* Onsite (AC)	Impact Offsite (AC)	Total Impacts (AC)
Developed (no Tier)	0.26	0.00	0.08	0.00	0.08
Disturbed (Tier IV)	0.10	0.07	0.03	0.00	0.03
Diegan Coastal Sage Scrub (Tier II)	0.55	0.55	0.00	0.00	0.00
<b>TOTAL</b>	<b>0.91</b>	<b>0.62</b>	<b>0.11</b>	<b>0.00</b>	<b>0.11</b>

\*New impacts including BMZ 1 and drainage improvements cover all land that was not previously developed and is not within the COE.

Direct Project impacts to Developed land and Disturbed land would not be significant and would not require mitigation.

No direct impacts to sensitive species are anticipated. For Crotch's bumble bee, impacts would be less than significant because suitable habitat for foraging (and possibly nesting and overwintering) would be conserved in the COE onsite. However, the City requires an avoidance measure as a condition of approval when there has been no documented occurrence of this species but potential for foraging exists. The City's Crotch's bumble bee avoidance measure is provided in **Attachment I**.

No direct impacts to wildlife corridors are anticipated because Project impacts would be limited to the Disturbed and Developed areas adjacent to the existing residence.

The Project would not directly impact any other sensitive biological resources. The remaining 0.62 acre of land west of the proposed impacts would be preserved and protected from future impacts with a Covenant of Easement, as shown in **Figure 6**.

### **Indirect Impacts**

Indirect impacts to biological resources near the Site would not be significant, because the ADU has been designed to be an unobtrusive addition to the Site in the least sensitive area. The structure is a single story with a roof garden. BMZ 1 with its landscaping would serve as a buffer between the ADU and the native habitat. No significant noise, light, water quality, or air quality impacts to the nearby Coastal Sage Scrub would be expected. No indirect impacts to any wildlife corridors that may exist nearby, such as along the canyon bottom to the west, are anticipated because the Project is located adjacent to the existing residence on Disturbed and Developed land as far from the canyon bottom as possible.

Even if California gnatcatcher were present onsite, potential construction noise impacts to this species would not be considered significant because the property is outside the MHPA. As the Project is not in or adjacent to the MHPA, the Project would not indirectly impact the MHPA, and Land Use Adjacency Guidelines are not applicable.

### **Cumulative Impacts**

The MSCP was designed to compensate for the regional loss of biological resources throughout the region. Projects that comply with the MSCP according to the Subarea Plan and implementing ordinances (i.e. Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. Therefore, by complying with the MSCP, this Project would have no significant cumulative impact on biological resources.

## MITIGATION AND MONITORING REQUIREMENTS

No mitigation or monitoring is needed because the Project would not result in significant impacts to sensitive biological resources.

## CONCLUSION

The Site supports sensitive Diegan Coastal Sage Scrub, including sensitive plant species. However, the ADU has been designed to avoid all impacts to sensitive habitat, and a 0.62-acre COE would be established over native habitat in the western portion of the Site. The Site is not adjacent to or near the MHPA. The Project would comply with the La Jolla Community Plan and Local Coastal Program Land Use Plan requirement to protect environmentally sensitive habitats (City of San Diego 2014) by avoiding impacts to Coastal Sage Scrub, and by establishing the COE. In conclusion, no significant impacts to sensitive habitats, sensitive species, or other sensitive biological resources are anticipated and no mitigation for such impacts is required.

If you have any questions, please do not hesitate to contact Athena Consulting.

Sincerely,



Catherine MacGregor  
Senior Biologist and Botanist

## FIGURES

1. Regional Map
2. Vicinity Map
3. Closest MHPA and Preserved Lands
4. Satellite Imagery of Site
5. Biological Resources
6. Project Impacts

## ATTACHMENTS

- A. Biologist Resume
- B. Site Photographs, June 2023
- C. Plants Observed on the 2734 Bordeaux Avenue Property
- D. Animals Observed on the 2734 Bordeaux Avenue Property
- E. Sensitive Plants with Potential to Occur on the 2734 Bordeaux Avenue Property
- F. Sensitive Animals with Potential to Occur on the 2734 Bordeaux Avenue Property
- G. Crotch's Bumble Bee Survey Report
- H. Detail of Disturbance Areas and Features
- I. Crotch's Bumble Bee Avoidance Measure

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# Regional Map

2734 BORDEAUX AVENUE



FIGURE 1

Source: SanGIS Data, 2019

December 2025

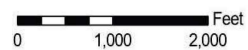


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## Vicinity Map

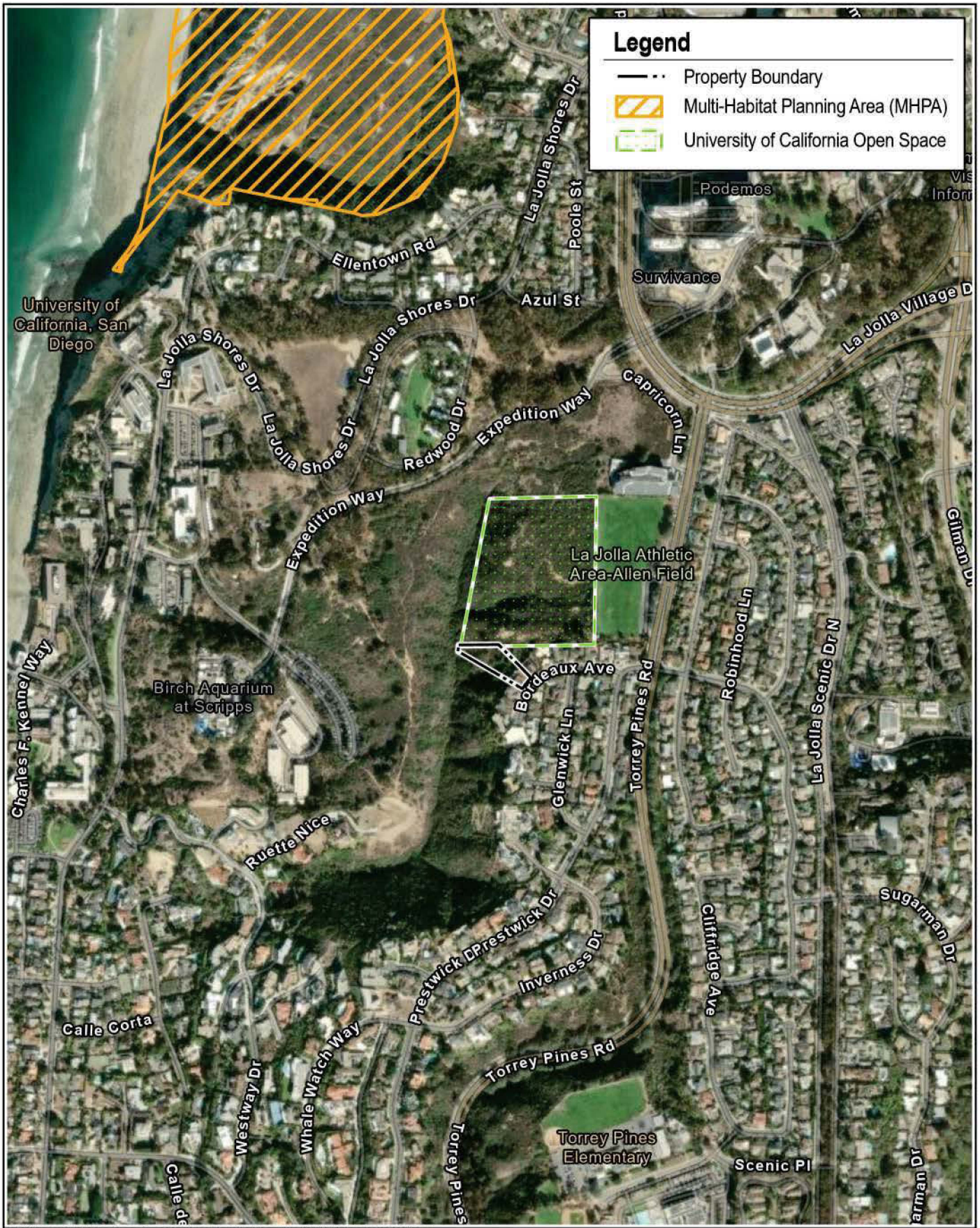
2734 BORDEAUX AVENUE



**FIGURE 2**

Aerial Source: ESRI USGS National Basemap, 2024

December 2025



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**Legend**

— · · Property Boundary



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**ATTACHMENT A**

**Biologist Resume**



# Catherine MacGregor

## Senior Biologist

**Education** Bachelor of Arts, Biological Sciences with Plant Ecology emphasis, minor in Marine and Coastal Science; Smith College, Northampton, MA

**Professional Background** Athena Consulting – July 2022 through Present  
REC Consultants, Inc. – 2001 to 2006 and 2013 to July 2022  
URS Corporation – 2012 to 2013  
TRC and SDG&E through Aerotek Staffing – 2011 to 2012

### **Professional Experience**

In her 17+ years of biological, botanical, and environmental science experience, Ms. MacGregor has performed extensive field work for floristic and rare plant surveys, habitat mapping, avian surveys, and jurisdictional wetlands and waters delineation. Botanical experience includes floristic and rare plant surveys in the coastal, mountain, and desert regions of southern California; detailed habitat mapping and assessment; and development, implementation, and monitoring of rare plant and habitat restoration projects. Wildlife experience includes general wildlife surveys, protocol surveys for burrowing owl and least Bell's vireo, and Gila woodpecker, Mojave fringe-toed lizard, and nesting bird surveys. Ms. MacGregor has managed teams of field biologists, prepared numerous biological technical reports and monitoring reports, managed environmental permit compliance, and coordinated with clients and agency personnel to successfully move projects through the permitting and approval processes.

### **Specific Work Experience**

#### **Biological Surveys and Reports**

- Habitat mapping, botanical surveys, wildlife surveys, and biological technical reports for a variety of development projects in the City of San Diego, County of San Diego, Cities of Santee, Oceanside, Encinitas, Carlsbad, Escondido, and Poway; and unincorporated San Diego County communities of Fallbrook, Pauma Valley, Valley Center, Borrego Springs, and East Otay Mesa.
- Habitat mapping, sensitive plant surveys, burrowing owl surveys, wetland assessment, biological resources report, and mitigation negotiation for a highly constrained 18-acre property in East Otay Mesa, San Diego County.
- Habitat mapping, sensitive plant surveys, and a biological resources report for a 14-acre property on western Otay Mesa, City of San Diego.
- Habitat mapping, focused sensitive plant surveys, burrowing owl survey, and biology reporting for a 71-acre site in East Otay Mesa.
- Current and forensic habitat mapping, biological resources report, least Bell's vireo surveys, jurisdictional delineation, and water resources permitting for a 31-acre industrial and sand mine property in inland San Diego County.
- Habitat mapping and biological resources report for a 67-acre warehouse project in East Otay Mesa.

- Biological resources mapping and jurisdictional delineation for a 117-acre winery in the community of Fallbrook, San Diego County.
- Rare plant surveys, least Bell's vireo surveys, nesting raptor surveys, and construction monitoring and permit compliance for the 416-acre Horse Creek Ridge project in Fallbrook, San Diego County.
- Habitat mapping, botanical surveys, and biology report for the 2,161-acre Star Ranch property in Cameron Corners, southeastern San Diego County.
- Spring sensitive plant surveys and report for the 714-acre Rough Acres Ranch site in eastern San Diego County.
- Habitat mapping, botanical and wildlife surveys, California gnatcatcher mapping, and biological technical report for a 43-acre site in Escondido, San Diego County.
- Habitat mapping, botanical, and sensitive wildlife surveys for two large solar power projects in eastern Riverside County, including management of biologist teams and preparation of reports.
- Habitat mapping and spring/rare plant and wildlife surveys at the 150-acre Pala Mesa Resort near Fallbrook in northern San Diego County.
- Habitat mapping, spring/rare plant and general wildlife surveys, biological technical report, and open space management plan for the 145-acre Viejas Hills project.
- Habitat mapping, spring/rare plant and general wildlife surveys, biological technical report, and upland habitat revegetation plan for a 145-acre residential development in the City of Poway.
- Spring/rare plant and wildlife surveys and biological technical report for the 952-acre Singing Hills project and coordination with Wildlife Agencies on siting the project to minimize wildlife impacts (now partially preserved for conservation).
- Training, permit compliance, nest surveys, crew supervision, and weekly reports during pole and powerline replacement for SDG&E Wood to Steel Project.
- Permit compliance, nest and site surveys, and crew supervision during transmission line and substation construction for Sunrise Powerlink Project.

#### **Representative Habitat and Sensitive Species Restoration Projects**

- Designed, supervised, monitored, and completed a riparian scrub habitat restoration project at an industrial sand mine property in inland San Diego County.
- Supervised implementation and managing monitoring for a least Bell's vireo habitat creation and enhancement project in the community of Fallbrook, San Diego County.
- Supervised implementation, managed maintenance, conducted monitoring, and prepared monitoring reports for a riparian scrub habitat restoration project in the City of San Marcos.
- Developed the restoration plan, supervised installation, managed maintenance, and performed monitoring through completion for Palmer's goldenbush restoration at Maderas Golf Club.
- Performed quantitative monitoring, data analysis, and annual reporting through completion for Market Creek Plaza in urban San Diego.
- Implemented and monitored an Otay tarplant restoration plan, managed maintenance, performed monitoring, and prepared annual reports for the Riviera del Sol Project, through completion.
- Monitored, prepared annual reports, directed remedial management, and guided a riparian habitat restoration project through agency sign-off for the Hidden Meadows riparian habitat restoration in Poway.

**ATTACHMENT B**

**Site Photographs**



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2734 Bordeaux Avenue Site Photographs, June 2023



1. Developed Land adjacent to the residence's lower terrace (from near southern boundary toward north).

2734 Bordeaux Avenue Site Photographs, June 2023



2. Concrete slope reinforcement on the Developed Land below the residence's lower terrace (from near southern boundary toward southeast).

2734 Bordeaux Avenue Site Photographs, June 2023



3. Retaining wall in the Developed area below the existing residence's lower terrace (from lower-central Developed toward north/northeast).

2734 Bordeaux Avenue Site Photographs, June 2023



4. Disturbed Land with ornamental and non-native species, downslope of the Developed Land (from central DIS area toward northeast).

2734 Bordeaux Avenue Site Photographs, June 2023



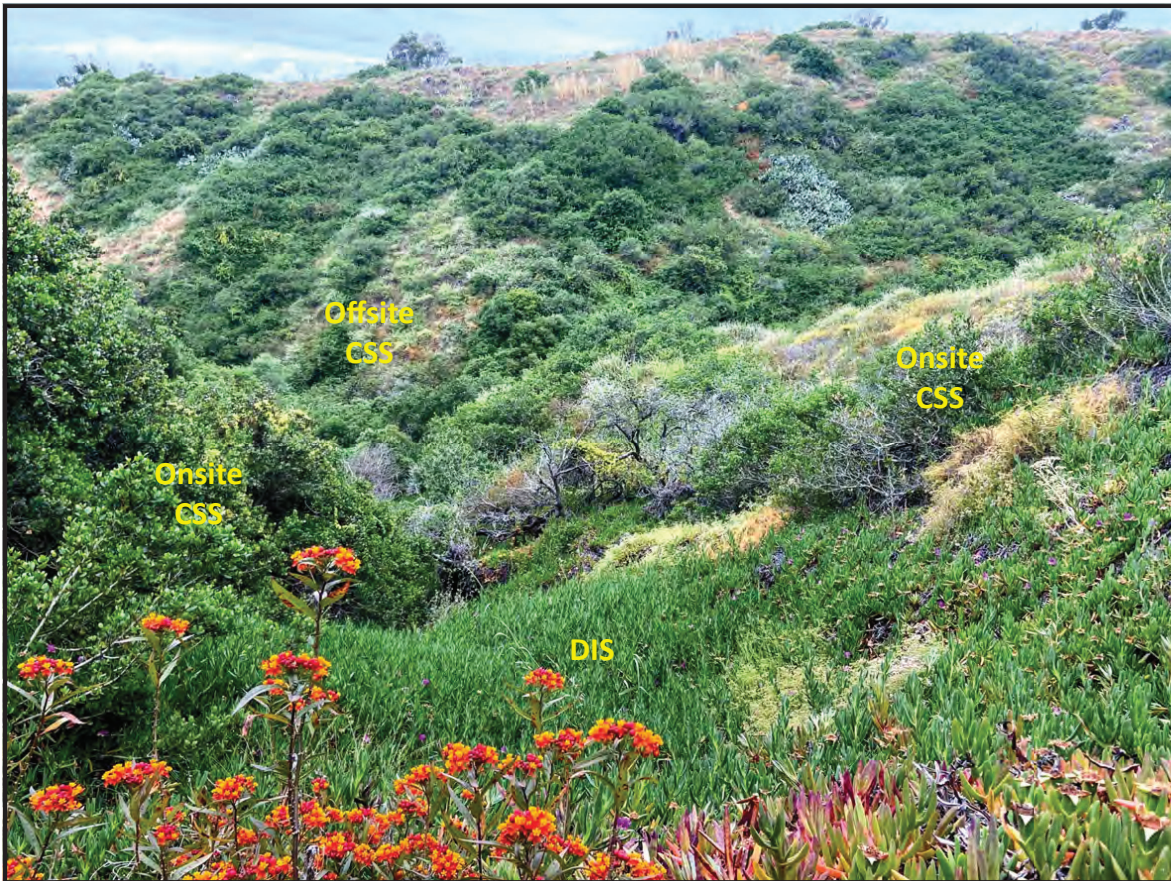
5. View of Developed and Disturbed Land (from upper-central Disturbed area toward east/southeast).

2734 Bordeaux Avenue Site Photographs, June 2023



6. Irrigation remnants in Disturbed Land, with Torrey pine trunk visible in upper right (from near northern boundary toward south).

2734 Bordeaux Avenue Site Photographs, June 2023



7. View of onsite and offsite Diegan Coastal Sage scrub (from central Disturbed Land toward west).

2734 Bordeaux Avenue Site Photographs, June 2023



8. Coastal Sage Scrub from mid-Site looking back (east) toward the Disturbed and Developed Land.

2734 Bordeaux Avenue Site Photographs, June 2023



8. Coastal Sage Scrub from near the western corner looking back (east) toward the residence.

2734 Bordeaux Avenue Site Photographs, June 2023



10. A California desert thorn growing in California buckwheat.

2734 Bordeaux Avenue Site Photographs, June 2023



11. The medium-size Torrey pine growing closer to the residence (toward south).

2734 Bordeaux Avenue Site Photographs, June 2023



12. The small, unhealthy Torrey Pine growing near then northern/northeastern Site boundary (toward southwest).

2734 Bordeaux Avenue Site Photographs, November 2025



13. Developed Land adjacent to the residence's lower terrace (from near southern boundary toward north) in November 2025.

2734 Bordeaux Avenue Site Photographs, November 2025



14. Dry Coastal Sage Scrub from mid-Site toward house in November 2025

2734 Bordeaux Avenue Site Photographs, November 2025



15. Coast barrel cactus under shrub in November 2025.

2734 Bordeaux Avenue Site Photographs, November 2025



16. Baby coast barrel cactus in November 2025.

**ATTACHMENT C**

**Plants Observed on the 2734 Bordeaux Avenue Property**

PLANTS OBSERVED ON THE 2734 BORDEAUX AVENUE PROPERTY			
Species Name	Common Name	Family	Habitat
<i>Acacia cyclops</i> *	western coastal wattle	Fabaceae	DEV, DIS
<i>Acacia sp.</i> *	acacia, wattle	Fabaceae	DEV
<i>Acmispon glaber</i>	deerweed	Fabaceae	CSS
<i>Adenostoma fasciculatum</i>	chamise	Rosaceae	CSS
<i>Aloe sp.</i> *	aloe	Asphodelaceae	DEV
<i>Anigozanthos sp.</i> *	kangaroo paw	Haemodoraceae	DEV
<i>Antirrhinum nuttallianum</i> subsp. <i>subsessile</i>	big-gland Nuttall's snapdragon	Plantaginaceae	CSS, DIS
<i>Arbutus unedo</i> *	strawberry tree	Ericaceae	DEV
<i>Artemisia californica</i>	coastal sagebrush	Asteraceae	CSS
<i>Asclepias curassavica</i> *	bloodflower milkweed	Apocynaceae	DIS
<i>Asparagus densiflorus</i> *	Sprenger's asparagus-fern	Asparagaceae	DEV
<i>Baccharis pilularis</i> subsp. <i>consanguinea</i>	chaparral broom, coyote brush	Asteraceae	CSS, DEV
<i>Bougainvillea sp.</i> *	bougainvillea	Nyctaginaceae	DEV
<i>Brachypodium distachyon</i> *	purple falsebrome	Poaceae	DEV, DIS
<i>Bromus diandrus</i> *	ripgut grass	Poaceae	DEV, DIS
<i>Bromus rubens</i> *	red brome, foxtail chess	Poaceae	CSS
<i>Camellia japonica</i> *	camellia	Theaceae	DEV
<i>Carpobrotus sp.</i> *	sea-fig or freeway iceplant	Aizoaceae	CSS, DEV, DIS
<i>Cleomella arborea</i>	bladderpod	Cleomaceae	CSS
<i>Cortaderia sp.</i> *	pampas grass	Poaceae	DEV
<i>Crassula connata</i>	pygmyweed	Crassulaceae	CSS
<i>Cuscuta sp.</i>	dodder	Convolvulaceae	CSS
<i>Cycas sp.</i> *	sago palm	Cycadaceae	DEV
<i>Diplacus sp.</i>	monkey flower	Phrymaceae	CSS
<i>Dipterostemon capitatus</i>	blue dicks	Themidaceae	CSS
<i>Dudleya edulis</i>	ladies' fingers	Crassulaceae	CSS
<i>Dudleya lanceolata</i>	lance-leaf dudleya	Crassulaceae	CSS
<i>Ehrharta erecta</i> *	panic veldt grass	Poaceae	DEV, DIS
<i>Elymus condensatus</i>	giant wild-rye	Poaceae	CSS
<i>Encelia californica</i>	California encelia	Asteraceae	CSS
<i>Erigeron bonariensis</i> *	flax-leaf fleabane	Asteraceae	DEV, DIS
<i>Eriogonum fasciculatum</i>	California buckwheat	Polygonaceae	CSS, DIS
<i>Eucalyptus spp.</i> *	eucalyptus	Myrtaceae	CSS, DEV, DIS
<i>Eucrypta chrysanthemifolia</i> var. <i>chrysanthemifolia</i>	common eucrypta	Boraginaceae	CSS
<i>Ferocactus viridescens!</i>	coast barrel cactus	Cactaceae	CSS
<i>Festuca myuros</i> *	rat-tail fescue	Poaceae	CSS
<i>Ficus lyrata</i> *	fiddle-leaf fig	Moraceae	DEV
<i>Ficus pumila</i> *	climbing fig	Moraceae	DEV
<i>Hedera sp.</i> *	ivy	Araliaceae	DEV
<i>Heteromeles arbutifolia</i>	toyon, Christmas berry	Rosaceae	CSS, DEV

Species Name	Common Name	Family	Habitat
<i>Lavandula sp.*</i>	lavender	Lamiaceae	DEV
<i>Limonium perezii*</i>	Perez's marsh-rosemary	Plumbaginaceae	DEV
<i>Lobelia sp.*</i>	lobelia	Campanulaceae	DEV
<i>Lupinus truncatus</i>	collar lupine	Fabaceae	CSS
<i>Lycium californicum!</i>	California desert thorn	Solanaceae	CSS
<i>Lycopersicon sp*</i>	tomato	Solanaceae	CSS
<i>Lysimachia arvensis*</i>	scarlet pimpernel	Myrsinaceae	DEV, DIS
<i>Malosma laurina</i>	laurel sumac	Anacardiaceae	DEV
<i>Marah macrocarpa</i>	wild-cucumber, manroot	Cucurbitaceae	CSS
<i>Melica imperfecta</i>	coast range melic	Poaceae	CSS
<i>Mesembryanthemum nodiflorum*</i>	slender-leaf iceplant	Aizoaceae	DIS
<i>Myoporum laetum*</i>	ngaio, mousehole tree	Scrophulariaceae	DEV
<i>Nuttallanthus texanus</i>	large blue toadflax	Plantaginaceae	CSS
<i>Opuntia sp.</i>	prickly-pear	Cactaceae	CSS
<i>Oxalis corniculata*</i>	yellow sorrel	Oxalidaceae	DEV
<i>Pellaea andromedifolia</i>	coffee fern	Pteridaceae	CSS
<i>Pentagramma sp.</i>	goldback or silverback fern	Pteridaceae	CSS
<i>Phoenix roebelenii*</i>	miniature date palm	Arecaceae	DEV
<i>Pinus halepensis*</i>	Aleppo pine	Pinaceae	DIS
<i>Pinus torreyana subsp. torreyana!</i>	Torrey pine	Pinaceae	CSS
<i>Pittosporum tobira*</i>	Japanese pittosporum	Pittosporaceae	DEV
<i>Poa sp.*</i>	blue grass	Poaceae	DEV
<i>Polypogon interruptus*</i>	ditch beard grass	Poaceae	DEV, DIS
<i>Pseudognaphalium biolettii</i>	bicolor cudweed	Asteraceae	CSS
<i>Pseudognaphalium californicum</i>	California everlasting	Asteraceae	CSS
<i>Pseudognaphalium sp.</i>	everlasting	Asteraceae	CSS
<i>Rhus integrifolia</i>	lemonadeberry	Anacardiaceae	CSS, DEV
<i>Ribes speciosum</i>	fuchsia-flower gooseberry	Grossulariaceae	CSS
<i>Rosa sp.*</i>	rose	Rosaceae	CSS
<i>Rosmarinus officinalis*</i>	rosemary	Lamiaceae	DEV
<i>Salvia mellifera</i>	black sage	Lamiaceae	CSS
<i>Schinus terebinthifolia*</i>	Brazilian pepper tree	Anacardiaceae	DEV
<i>Schismus barbatus*</i>	Mediterranean schismus	Poaceae	CSS
<i>Solanum sp.(*)</i>	nightshade	Solanaceae	CSS
<i>Sonchus oleraceus*</i>	common sow-thistle	Asteraceae	DEV, DIS
<i>Stephanomeria sp.</i>	wreath plant	Asteraceae	CSS, DIS
<i>Stipa lepida</i>	foothill needle grass	Poaceae	CSS
<i>Stipa miliacea var. miliacea*</i>	smilo grass	Poaceae	DEV, DIS
<i>Stipa sp.</i>	needle grass	Poaceae	CSS
<i>Tecoma capensis*</i>	Cape honeysuckle	Bignoniaceae	DEV
<i>Tibouchina sp.*</i>	princess flower	Melastomataceae	DEV
<i>Xylococcus bicolor</i>	mission manzanita	Ericaceae	CSS
<i>Zantedeschia aethiopica*</i>	calla lily	Araceae	DEV

\* Non-native

Species Name	Common Name	Family	Habitat
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! State or Federal special-status (State endangered, threatened, or rare; Federal endangered, threatened, or candidate for listing; CRPR 1-4)

Habitat Abbreviations

CSS = Coastal Sage Scrub

DEV = Developed Land

DIS = Disturbed Land

Note: This list is not intended to include all landscape ornamental species.

**ATTACHMENT D**

**Animals Observed on the 2734 Bordeaux Avenue Property**

ANIMALS OBSERVED ON THE 2734 BORDEAUX AVENUE PROPERTY			
Species Name	Common Name	Habitat	Number
<b>Invertebrates</b>			
<i>Bombus vosnesenskii</i>	yellow-faced bumble bee	CSS	10
<i>Apis mellifera</i> *	western honey bee	CSS, DEV	3
<b>Reptiles</b>			
<i>Sceloporus occidentalis</i>	western fence lizard	CSS	1
<b>Birds</b>			
<i>Buteo jamaicensis</i>	red-tailed hawk	CSS	feather
<i>Calypte anna</i>	Anna's hummingbird	CSS, DEV	2
<i>Chamaea fasciata</i>	wrentit	CSS	1
<i>Corvus brachyrhynchos</i>	American crow	flyover	2
<i>Haemorhous mexicanus</i>	house finch	CSS, DIS	several
<i>Icterus cucullatus</i>	hooded oriole	DEV	1
<i>Leiothlypis celata</i>	orange-crowned warbler	offsite	
<i>Melospiza melodia</i>	song sparrow	CSS	1
<i>Melospiza crissalis</i>	California towhee	CSS	1
<i>Mimus polyglottos</i>	northern mockingbird	offsite	1
<i>Pipilo maculatus</i>	spotted towhee	CSS	2
<i>Selasphorus sasin</i>	Allen's hummingbird	DEV	
<i>Spinus psaltria</i>	lesser goldfinch	CSS and offsite	1
<i>Troglodytes aedon</i>	house wren	CSS, DEV, DIS	3
<i>Tyrannus vociferans</i>	Cassin's kingbird	offsite	1
<b>Mammals</b>			
<i>Canis latrans</i>	coyote	CSS	scat
<i>Sylvilagus sp.</i>	rabbit	CSS	scat

\* non-native

Habitat Abbreviations

CSS = Coastal Sage Scrub

DEV = Developed Land

DIS = Disturbed Land

**ATTACHMENT E**

**Sensitive Plants with Potential to Occur on the 2734 Bordeaux Avenue Property**

**ATTACHMENT E**

SENSITIVE PLANTS WITH POTENTIAL TO OCCUR ON THE 2734 BORDEAUX AVENUE PROPERTY USGS LA JOLLA AND DEL MAR QUADRANGLES, 70-111 METERS (231-363 FT) AMSL									
Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ SW	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Abronia maritima</i>	red sand-verbena	Nyctaginaceae	4.2	-/-	-	-	Perennial herb, Feb-Nov	Coastal dunes. 0-100 m.	Not expected to occur onsite, no suitable dune habitat.
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	Lamiaceae	1B.1	SE/FT	X	X	Annual herb, Apr-Jun	Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Endemic to active vertisol clay soils of mesas & valleys. Usually on clay lenses within grassland or chaparral communities. 10-960 m.	Not expected because not observed and no suitable clay patches found.
<i>Acmispon prostratus</i> ( <i>Lotus nuttallianus</i> )	Nuttall's acmispon (Nuttall's lotus)	Fabaceae	1B.1	-/-	X	-	Annual herb, Mar-Jun (Jul)	Coastal dunes, sandy coastal scrub. 0-18 m.	Not expected due to lack of suitable sandy habitat close to sea level.
<i>Adolphia californica</i>	California adolphia	Rhamnaceae	2B.1	-/-	-	-	Shrub (deciduous), Dec-May	From sandy/gravelly to clay soils within grassland, coastal sage scrub, or chaparral; various exposures. 45-740 m.	Not expected because would have been detectable and was not observed.
<i>Agave shawii</i> var. <i>shawii</i>	Shaw's agave	Agavaceae	2B.1	-/-	X	X	Perennial (leaf succulent), Sep-May	Coastal bluffs and slopes within coastal sage scrub. 10-120 m.	Not expected to because would have been detectable and was not observed.
<i>Ambrosia monogyra</i> ( <i>Hymenoclea m.</i> )	leafy burrobush	Asteraceae	2B.2	-/-	-	-	Shrub, Aug-Nov	Sandy or rocky soils in washes and dry river bottoms, sage scrub, chaparral and Sonoran desert scrub. 10-500 m.	Not expected because would have been detectable and was not observed.
<i>Ambrosia pumila</i>	San Diego ambrosia	Asteraceae	1B.1	-/FE	X	X	Perennial herb (deciduous, rhizomatous), Apr-Oct	In full sun in open or low-growing plant communities, primarily on sandy loam or clay soils (rarely on other substrates such as gravel) on upper terraces of rivers, creeks, or other drainage, or within the watershed of vernal pools. 3-580 m.	Not expected due to lack of preferred soil and microhabitat.
<i>Aphanisma blitoides</i>	aphanisma	Chenopodiaceae	1B.2	-/-	X	X	Annual herb, Feb-Jun	Sandy or clay soils in coastal bluff scrub, coastal dunes, coastal scrub. 3-305 m.	Not expected because should have been detectable and was not observed.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Aphyllon parishii</i> subsp. <i>brachylobum</i> ( <i>Orobanche p. subsp. brachyloba</i> )	short-lobe orobanche	Orobanchaceae	4.2	-/-	-	-	Perennial herb (parasitic), Apr-Oct	Sandy coastal bluff scrub, coastal dunes, coastal scrub; parasitic on shrubs, generally <i>Isocoma menziesii</i> . 3-305 m.	Not expected to occur onsite because should have been detectable and was not observed.
<i>Arctostaphylos glandulosa</i> subsp. <i>crassifolia</i>	Del Mar manzanita	Ericaceae	1B.1	-/FE	X	-	Shrub (evergreen), Dec-Jun	Chaparral on sandy coastal mesas and ocean bluffs. 30-365 m.	Not expected to occur onsite because would have been detectable and was not observed.
<i>Artemisia palmeri</i>	San Diego sagewort	Asteraceae	4.2	-/-	-	-	Biennial to perennial herb to subshrub, (Feb) May-Sep	Drainages and riparian areas in sandy soil within chaparral, coastal scrub, riparian forest, riparian woodland and riparian scrub. 15-915 m.	Not expected to occur onsite because would have been detectable and was not observed.
<i>Astragalus tener</i> var. <i>titi</i>	coastal dune milkvetch	Fabaceae	1B.1	SE/FE	X	X	Annual herb, Mar-May	Moist, sandy depressions of bluffs or dunes in coastal bluff scrub, coastal dunes, coastal prairie. 1-45 m.	Not expected to occur onsite due to lack of suitable habitat with moist depressions closer to sea level.
<i>Atriplex coulteri</i>	Coulter's saltbush	Chenopodiaceae	1B.2	-/-	-	-	Perennial herb, Mar-Oct	Alkaline or clay soils in coastal bluff scrub, coastal dunes, coastal scrub, valley & foothill grassland, also ridgetops and alkaline low places. 2-460 m.	Not expected to occur onsite because not observed and no suitable patches of alkaline or clay soil observed.
<i>Atriplex pacifica</i>	south coast saltscale	Chenopodiaceae	1B.2	-/-	-	-	Annual herb, Mar-Oct	Alkali soils in coastal bluff scrub, coastal dunes, coastal scrub, playas. 1-400 m.	Not expected to occur onsite because not observed and no suitable alkaline patches observed.
<i>Baccharis vanessae</i>	Encinitas baccharis	Asteraceae	1B.1	SE/FT	X	X	Shrub (deciduous), Aug-Nov	Steep, open, rocky areas in chaparral, cismontane woodland. 40-855 m.	Not expected because would have been detectable and was not found.
<i>Bahiopsis laciniata</i> ( <i>Viguiera l.</i> )	San Diego sunflower (San Diego County <i>viguiera</i> )	Asteraceae	4.3	-/-	-	-	Shrub, Feb-Jun (Aug)	Slopes and ridges in chaparral and coastal scrub. 60-750 m.	Not expected because would have been detectable and was not found.
<i>Bergerocactus emoryi</i>	golden-spined cereus	Cactaceae	2B.2	-/-	-	-	Perennial (stem succulent), May-Jun	Sandy soils in chaparral, closed-cone coniferous forest, coastal scrub; coastal only. 3-395 m.	Not expected because would have been detectable and was not found.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Bloomeria clevelandii</i> ( <i>Muilla c.</i> )	San Diego goldenstar	Themidaceae	1B.1	-/-	X	-	Perennial herb (bulbiferous), Apr-May	Clay soil in chaparral, coastal scrub, valley & foothill grassland. Often on mounds between vernal pools in fine, sandy loam. 50-465 m.	Not expected due to lack of suitable clay soil or mima mound habitat.
<i>Brodiaea orcuttii</i>	Orcutt's brodiaea	Themidaceae	1B.1	-/-	X	-	Perennial herb (bulbiferous), May-Jul	Mesic, clay, sometimes serpentine soils in closed-cone coniferous forest, chaparral, cismontane woodland, meadows & seeps, valley & foothill grassland. Usually in vernal pools and small drainages. 30-1695 m.	Not expected due to lack of mesic and/or clayey areas, no vernal pool habitat.
<i>Camissoniopsis lewisii</i> ( <i>Camissonia l.</i> )	Lewis's evening-primrose	Onagraceae	3	-/-	-	-	Annual herb, Mar-May (Jun)	Sandy or clay soil in cismontane woodland, coastal bluff scrub, coastal dunes, coastal scrub, valley & foothill grassland. 0-300 m.	Low-moderate potential to occur in COE area, suitable habitat and can be difficult to identify.
<i>Ceanothus cyaneus</i>	Lakeside ceanothus	Rhamnaceae	1B.2	-/-	X	-	Shrub (evergreen), Apr-Jun	Closed-cone coniferous forest, chaparral. 200-1040 m.	Not expected because would have been detectable and was not found, usually occurs at higher elevations.
<i>Ceanothus otayensis</i>	Otay Mountain ceanothus	Rhamnaceae	1B.2	-/-	-	-	Shrub (evergreen), Jan-Apr	Metavolcanic or gabbroic soils in chaparral. 75-1160 m.	Not expected due to lack of associated soils and not observed.
<i>Ceanothus verrucosus</i>	wart-stemmed ceanothus	Rhamnaceae	2B.2	-/-	X	-	Shrub (evergreen), Dec-May	Southern maritime chaparral and nearby chaparral, rocky slopes. 1-380 m.	Not expected, documented nearby but would have been seen if present onsite.
<i>Centromadia parryi subsp. australis</i>	southern tarplant	Asteraceae	1B.1	-/-	-	-	Annual herb, May-Nov	Marshes and swamps (margins), valley & foothill grassland (vernally mesic), vernal pools, disturbed areas. 0-975 m.	Not expected due to lack of suitable vernal mesic habitat.
<i>Chaenactis glabriuscula var. orcuttiana</i>	Orcutt's pincushion	Asteraceae	1B.1	-/-	-	-	Annual herb, Jan-Aug	Sandy coastal bluff scrub, coastal dunes. 0-100 m.	Not expected due to lack of suitable coastal bluffs or dunes.
<i>Chloropyron maritimum subsp. maritimum</i> ( <i>Cordylanthus maritimus subsp. m.</i> )	salt marsh bird's beak	Orobanchaceae	1B.2	SE/FE	X	-	Annual herb (hemiparasitic), May-Oct (Nov)	Limited to the higher zones of salt marsh habitat. 0-10 m.	Not expected due to lack of saltmarsh habitat.

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Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Chorizanthe orcuttiana</i>	Orcutt's spineflower	Polygonaceae	1B.1	SE/FE	-	-	Annual herb, Mar-May	Sandy openings in maritime chaparral, closed-cone coniferous forest, and coastal scrub. 3-125 m.	Not expected due to lack of suitable sandy openings.
<i>Chorizanthe polygonoides</i> var. <i>longispina</i>	long-spined spineflower	Polygonaceae	1B.2	-/-	-	-	Annual herb, Apr-Jul	Gabbroic clay soils in chaparral, coastal scrub, meadows & seeps, valley & foothill grassland, near vernal pools. 30-1530 m.	Not expected due to lack of preferred soil and microhabitat.
<i>Cistanthe maritima</i>	seaside cistanthe	Montiaceae	4.2	-/-	-	-	Annual herb, (Feb) Mar-Jun (Aug)	Sandy and cobbly loam soil on marine terrace slopes near the coast; coastal bluff scrub, coastal scrub, valley & foothill grassland. 5-300 m.	Not expected due to lack of preferred substrate and not observed.
<i>Comarostaphylis diversifolia</i> subsp. <i>diversifolia</i>	summer-holly	Ericaceae	1B.2	-/-	-	-	Shrub (evergreen), Apr-Jun	Chaparral (often mixed, sometimes post-burn), cismontane woodland. 30-945 m.	Not expected, would have been detectable and was not observed.
<i>Convolvulus simulans</i>	small-flowered morning-glory	Convolvulaceae	4.2	-/-	-	-	Annual herb, Mar-Jul	Wet clay and serpentine ridges in chaparral openings, coastal scrub, valley & foothill grassland. 30-700 m.	Not expected due to lack of clay soils.
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i> (Jepson recognizes no varieties and includes this in <i>C. filaginifolia</i> )	Del Mar Mesa sand aster	Asteraceae	1B.1	-/-	X	-	Perennial herb, May-Sep	Maritime sediments and conglomerates in openings of coastal bluff scrub, maritime chaparral, and coastal scrub. 15-150 m.	Low-moderate potential in COE area, suitable habitat and substrate but no <i>Corethrogyne</i> observed.
<i>Cylindropuntia californica</i> var. <i>californica</i> ( <i>Opuntia parryi</i> var. <i>serpentina</i> )	snake cholla	Cactaceae	1B.1	-/-	X	X	Perennial (stem succulent), Apr-May	Coastal chaparral, coastal sage scrub. 30-150 m.	Not expected, would have been detectable and was not observed.
<i>Dichondra occidentalis</i>	western dichondra, western ponyfoot	Convolvulaceae	4.2	-/-	-	-	Perennial herb (rhizomatous), (Jan) Mar-Jul	Sandy loam, clay and rocky soils in chaparral, cismontane woodland, coastal scrub, valley & foothill grassland. 50-500 m.	Low-moderate potential in COE area, not observed, but habitat is suitable and often occurs under shrubs where it is hard to find.
<i>Diplacus aridus</i> ( <i>Mimulus a.</i> )	Jacumba monkey flower, low bush monkey flower	Phrymaceae	4.3	-/-	-	-	Shrub (evergreen), Apr-Jul	Dry, open, rocky, chaparral and Sonoran desert scrub. 750-1200 m.	Not expected due to lack of suitable chaparral or desert scrub.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Dudleya blochmaniae</i> subsp. <i>blochmaniae</i>	Blochman's dudleya	Crassulaceae	1B.1	-/-	-	-	Perennial herb, Apr-Jun	Coastal bluff scrub, chaparral, coastal scrub, valley & foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 5-450 m.	Not expected, no suitable open areas or clay areas and not observed.
<i>Dudleya brevifolia</i> ( <i>D. blochmaniae</i> subsp. <i>brevifolia</i> )	short-leaf dudleya	Crassulaceae	1B.1	SE/-	X	X	Perennial herb, Apr-May	On Torrey sandstone in pebbly openings in maritime chaparral & coastal scrub. 30-125 m.	Not expected, no suitable substrate or microhabitat onsite and not observed.
<i>Dudleya variegata</i>	variegated dudleya	Crassulaceae	1B.2	-/-	X	X	Perennial herb, Apr-Jun	Often rocky/gravelly or clay soils or on rock outcrops in grassland, openings in chaparral, cismontane woodland, coastal scrub, also near vernal pools or on mima mounds. 3-550 m.	Not expected, no suitable soils or microhabitat observed, not observed.
<i>Dudleya viscida</i>	sticky dudleya	Crassulaceae	1B.2	-/-	X	-	Perennial herb, May-Jun	North and south-facing cliffs and banks in coastal bluff scrub, chaparral, cismontane woodland, coastal scrub. 10-550 m.	Not expected, would have been detectable and was not observed.
<i>Ericameria palmeri</i> var. <i>palmeri</i>	Palmer's goldenbush	Asteraceae	1B.1	-/-	X	-	Shrub (evergreen), (Jul) Sep-Nov	Steep hillsides, granitic soils in mesic chaparral, coastal scrub. 5-625 m.	Not expected, would have been detectable and was not observed.
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button-celery	Apiaceae	1B.1	SE/FE	X	X	Biennial to perennial herb, Apr-Jun	San Diego mesa hardpan & claypan vernal pools & southern interior basalt flow vernal pools in coastal scrub or valley and foothill grassland. 15-880 m.	Not expected, no vernal pools or similar onsite, not observed.
<i>Erysimum ammophilum</i>	coast wallflower, sand-loving wallflower	Brassicaceae	1B.2	-/-	X	-	Perennial herb, Feb-Jun	Openings in sandy maritime chaparral, coastal dunes, and coastal scrub. 3-320 m.	Not expected, would have been detectable and was not observed.
<i>Euphorbia misera</i>	cliff spurge	Euphorbiaceae	2B.2	-/-	-	-	Shrub, Dec-Aug (Oct)	Rocky coastal bluff scrub, coastal scrub, Mojavean desert scrub. 3-430 m.	Not expected, would have been detectable and was not observed.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Ferocactus viridescens</i>	coast barrel cactus, San Diego barrel cactus	Cactaceae	2B.1	-/-	X	-	Perennial (stem succulent), May-Jun	Chaparral, coastal scrub, valley & foothill grassland, near vernal pools; often exposed, level or south-sloping areas, near crest of slopes. 3-490 m.	<b>Occurs onsite in the COE area - 7 found in the original 2001 location and 1 found in second location.</b>
<i>Geothallus tuberosus</i>	Campbell's liverwort	Sphaerocarpaceae	1B.1	-/-	-	-	Ephemeral liverwort	Vernal pools and mesic coastal scrub. 10-600 m.	Not expected due to lack of vernal pools or mesic CSS.
<i>Harpagonella palmeri</i>	Palmer's grappling-hook	Boraginaceae	4.2	-/-	-	-	Annual herb, Mar-May	Clay soils in chaparral, coastal scrub, valley & foothill grassland. 20-955 m.	Not expected because no clay soils or open scrub.
<i>Heterotheca sessiliflora subsp. sessiliflora</i>	false goldenaster, beach goldenaster	Asteraceae	1B.1	-/-	-	-	Perennial herb, Mar-Dec	Sandy soils in coastal chaparral, coastal dunes, coastal scrub. 0-5 m.	Not expected because it occurs at shore close to sea level.
<i>Holocarpha virgata subsp. elongata</i>	graceful tarplant	Asteraceae	4.2	-/-	-	-	Annual herb, May-Nov	Chaparral, cismontane woodland, coastal scrub, valley & foothill grassland. 60-1100 m.	Not expected, would have been detectable and was not observed.
<i>Hordeum intercedens</i>	little barley, vernal barley	Poaceae	3.2	-/-	-	-	Annual herb, Mar-Jun	Dry, saline streambeds and alkaline flats in coastal dunes, coastal scrub, valley and foothill grassland; vernal pools. 5-1000 m.	Not expected due to lack of suitable saline or alkaline areas or vernal pools.
<i>Isocoma menziesii var. decumbens</i>	decumbent goldenbush	Asteraceae	1B.2	-/-	-	-	Shrub, Apr-Nov	Sandy, often disturbed areas in chaparral, coastal scrub. 1-915 m.	Not expected, would have been detectable and was not observed.
<i>Iva hayesiana</i>	San Diego marsh-elder	Asteraceae	2B.2	-/-	-	-	Perennial herb to subshrub, Apr-Oct	Alkaline flats, depressions, streambanks. 1-430 m.	Not expected, habitat lacking, would have been detectable and was not observed.
<i>Juglans californica (l. c. var. californica)</i>	Southern California black walnut	Juglandaceae	4.2	-/-	-	-	Tree (deciduous), Mar-Aug	Slopes, canyons, and alluvial habitats in chaparral, cismontane woodland, coastal scrub. 50-900 m.	Not expected, habitat lacking, would have been detectable and was not observed.
<i>Juncus acutus subsp. leopoldii</i>	southwestern spiny rush	Juncaceae	4.2	-/-	-	-	Perennial herb, (Mar) May-Jun	Moist saline places such as mesic coastal dunes, alkaline seeps, salt marshes. 3-900 m.	Not expected, habitat lacking, would have been detectable and was not observed.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Lasthenia glabrata</i> subsp. <i>coulteri</i>	Coulter's salt-marsh daisy, Coulter's goldfields	Asteraceae	1B.1	-/-	-	-	Annual herb, Feb-Jun	Alkaline soils in coastal salt marshes & swamps, playas, vernal pools. 1-1375 m.	Not expected due to lack of wet areas or vernal pools.
<i>Lathyrus splendens</i>	Campo pea, pride-of-California	Fabaceae	4.3	-/-	-	-	Perennial herb, Mar-Jun	Sandy to gravelly soils in chaparral. 200-1525 m.	Not expected due to absence of suitable chaparral, usually occurs at higher elevations, not observed.
<i>Lepidium virginicum</i> var. <i>robinsonii</i> (not recognized in Jepson)	Robinson's peppergrass	Brassicaceae	4.3	-/-	-	-	Annual herb, Jan-Jul	Dry chaparral, coastal scrub. 4-1435 m.	Moderate potential to occur in the COE area; is somewhat widespread, documented nearby, and would have been difficult to identify during the June Site survey.
<i>Leptosyne maritima</i> ( <i>Coreopsis</i> m.)	San Diego sea-dahlia	Asteraceae	2B.2	-/-	-	-	Perennial herb, Mar-May	Coastal bluffs. 5-185 m.	Not expected, flower heads would have been detectable and were not found.
<i>Lycium californicum</i>	California desert thorn	Solanaceae	4.2	-/-	-	-	Shrub, (Dec) Mar-Aug	Coastal bluff scrub, coastal scrub. 5-150 m.	<b>Occurs onsite in the COE area - one individual was found, partially overgrown by nearby shrubs.</b>
<i>Microseris douglasii</i> subsp. <i>platycarpa</i>	small-flower microseris	Asteraceae	4.2	-/-	-	-	Annual herb, Mar-May	Alkaline clay soils in cismontane woodland, coastal scrub, valley & foothill grassland, vernal pools. 15-1070 m.	Not expected due to lack of suitable soil and habitat.
<i>Mobergia calculiformis</i>	light gray lichen	Physciaceae	3	-/-	-	-	Lichen	Coastal scrub; abundant on cobbles in right habitat; only known from one site in Baja CA and one in San Diego. 10 m.	Lichens were not evaluated, but if present, would be within the CSS habitat in the COE.
<i>Monardella viminea</i> ( <i>M. linooides</i> subsp. v.)	willow monardella	Lamiaceae	1B.1	SE/FE	X	-	Perennial herb to subshrub, Jun-Aug	Canyons, rocky and sandy places, and alluvial, ephemeral washes or floodplains in chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland. 45-230 m.	Not expected, lack of riparian area, would have been detectable and was not observed.
<i>Myosurus minimus</i> (includes <i>M. m.</i> subsp. <i>apus</i> )	little mousetail	Ranunculaceae	3.1	-/-	-	-	Annual herb, Mar-Jun	Valley & foothill grassland, vernal pools (alkaline). 20-640 m.	Not expected due to lack of vernal pools, not observed.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Navarretia fossalis</i>	spreading navarretia, Moran's navarretia	Polemoniaceae	1B.1	-/FT	X	X	Annual herb, Apr-Jun	Vernal pools, swales, and depressions surrounded by chaparral, grassland, or scrub. 15- 850 m.	Not expected due to lack of vernal pools, not observed.
<i>Navarretia prostrata</i>	flat navarretia	Polemoniaceae	1B.1	-/-	-	-	Annual herb, Apr-Jul	Mesic, alkaline areas in coastal scrub, valley and foothill grassland, vernal pools, meadows and seeps. 3-1235 m.	Not expected due to lack of vernal pools, not observed.
<i>Nemacaulis denudata</i> var. <i>denudata</i>	coast woolly-heads	Polygonaceae	1B.2	-/-	-	-	Annual herb, Apr-Sep	Coastal dunes. 0-5 m.	Not expected due to lack of dunes.
<i>Ophioglossum californicum</i>	California adder's tongue	Ophioglossaceae	4.2	-/-	-	-	Perennial herb (rhizomatous), (Dec) Jan-Jun	Mesic chaparral and valley & foothill grassland, vernal pools margins. 60-525 m.	Not expected due to lack of mesic natural areas or vernal pools.
<i>Orcuttia californica</i>	California Orcutt's grass	Poaceae	1B.1	SE/FE	X	X	Annual herb, Apr-Aug	Vernal pools. 10-660 m.	Not expected due to lack of vernal pools.
<i>Pentachaeta aurea</i> subsp. <i>aurea</i>	golden-ray pentachaeta	Asteraceae	4.2	-/-	-	-	Annual herb, Mar-Jul	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland, valley & foothill grassland. 80-1850 m.	Not expected, would have been detectable and was not observed.
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i> (no varieties recognized in <i>lenson</i> )	south coast branching phacelia	Boraginaceae	3.2	-/-	-	-	Perennial herb, Mar-Aug	Sandy or rocky chaparral, coastal scrub, coastal dunes, coastal salt marsh. 5-300 m.	Not expected, would have been detectable and was not observed.
<i>Phacelia stellaris</i>	Brand's phacelia	Boraginaceae	1B.1	-/-	-	-	Annual herb, Mar-Jun	Coastal dunes, openings in coastal scrub. 3-370 m.	Not expected due to lack of dunes or suitably sandy CSS habitat.
<i>Pinus torreyana</i> subsp. <i>torreyana</i>	<b>Torrey pine</b>	<b>Pinaceae</b>	<b>1B.2</b>	<b>-/-</b>	<b>X</b>	<b>-</b>	<b>Tree (evergreen)</b>	<b>Dry sandstone slopes in closed- cone coniferous forest, chaparral. 70-160 m.</b>	<b>Occurs onsite - two individuals, likely planted, observed in the COE area near the edge of landscaping and/or irrigation.</b>
<i>Piperia cooperi</i>	Cooper's rein orchid	Orchidaceae	4.2	-/-	-	-	Perennial herb, Mar-Jun	Chaparral, cismontane woodland, valley & foothill grassland. 15- 1585 m.	Not expected due to lack of suitable habitat.
<i>Pogogyne abramsii</i>	San Diego mesa mint	Lamiaceae	1B.1	SE/FE	X	X	Annual herb, Mar-Jul	Vernal pools within grasslands, chamise chaparral, or coastal sage scrub. 70-195 m.	Not expected due to lack of vernal pools or similar.
<i>Pogogyne nudiuscula</i>	Otay mesa mint	Lamiaceae	1B.1	SE/FE	X	X	Annual herb, May-Jul	Dry beds of vernal pools and moist swales. 135-165 m.	Not expected due to lack of vernal pools or similar.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Quercus dumosa</i>	Nuttall's scrub oak	Fagaceae	1B.1	-/-	-	-	Shrub (evergreen), Feb-Apr (May-Aug)	Sandy soil near coast, clay loam soils in closed-cone coniferous forest, chaparral, coastal scrub. 15-400 m.	Not expected; although documented immediately north of the Site, would have been detectable and was not found.
<i>Quercus engelmannii</i>	Engelmann/mesa blue oak	Fagaceae	4.2	-/-	-	-	Tree (deciduous), Mar-Jun	Chaparral, cismontane woodland, riparian woodland, valley & foothill grassland. 50-1300 m.	Not expected, would have been detectable and was not observed.
<i>Salvia munzii</i>	Munz's sage	Lamiaceae	2B.2	-/-	-	-	Shrub (evergreen), Feb-Apr	Rocky hills and slopes in chaparral, coastal scrub. 35-575 m.	Not expected, would have been detectable and was not observed.
<i>Selaginella cinerascens</i>	ashy spike-moss	Selaginellaceae	4.1	-/-	-	-	Perennial herb (rhizomatous)	Chaparral and coastal scrub on undisturbed soil. 20-640 m.	Not expected, would have been detectable and was not observed.
<i>Senecio aphanactis</i>	California groundsel, chaparral ragwort	Asteraceae	2B.2	-/-	-	-	Annual herb, Jan-Apr (May)	Alkaline flats; dry, open, rocky areas. 10-550 m.	Not expected, no suitable habitat found onsite.
<i>Sidalcea neomexicana</i>	salt spring checker-bloom	Malvaceae	2B.2	-/-	-	-	Perennial herb, Mar-Jun	Alkali springs and marshes in chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and	Not expected, no suitable springs or alkaline moist areas, would have been detectable and was not observed.
<i>Sphaerocarpos drewei</i>	bottle liverwort	Sphaerocarpaceae	1B.1	-/-	-	-	Liverwort (ephemeral)	On soil in openings of chaparral, coastal scrub. 90-600 m.	Liverworts were not assessed, but if present, would be in the COE CSS.
<i>Stemodia durantifolia</i>	blue streamwort, purple stemodia	Plantaginaceae	2B.1	-/-	-	-	Perennial herb, Jan-Dec	Sandy soil in riparian habitats, on wet sand or rocks, drying streambeds, mesic Sonoran desert scrub. 35-795 m.	Not expected due to lack of suitable habitat, not observed.
<i>Stipa diegoensis</i> ( <i>Achnatherum diegoense</i> )	San Diego needlegrass, San Diego County needle grass	Poaceae	4.2	-/-	-	-	Perennial herb, Feb-Jun	Rocky slopes, sea cliffs and stream banks, often mesic areas in chaparral, coastal scrub. 10-800 m.	Not expected, unidentified Stipa did not appear to be this species, but if present, would be within COE.
<i>Stylocline citroleum</i>	oil neststraw	Asteraceae	1B.1	-/-	-	-	Annual herb, Mar-Apr	Flats, clay soils in oil-producing areas in chenopod scrub, coastal scrub, valley & foothill grassland. No modern occurrences outside of Bakersfield, CA. 50-400 m.	Not expected due to lack of suitable habitat.

**ATTACHMENT E**

Species Name	Common Name	Family	CRPR	State/ Federal	MSCP	City NE/ VP	Growth form, bloom time	Habitat	Potential to Occur Onsite
<i>Suaeda esteroa</i>	estuary sea-blite	Chenopodiaceae	1B.2	-/-	-	-	Perennial herb, (May) Jul-Oct (Jan)	Coastal salt marshes. < 5 m.	Not expected due to lack of suitable habitat.
<i>Suaeda taxifolia</i>	woolly sea-blite	Chenopodiaceae	4.2	-/-	-	-	Shrub (evergreen), Jan-Dec	Coastal bluff scrub, margins of salt marshes. < 15 m.	Not expected due to lack of suitable habitat.
<i>Texosporium sancti-jacobi</i>	woven-spored lichen	Caliciaceae	3	-/-	-	-	Lichen	A crustose lichen that grows on soil, small mammal pellets, dead twigs, decaying organic matter, and Selaginella, in openings in chaparral; with Adenostoma fasciculatum, Eriogonum, Selaginella. 290-660 m.	Lichens were not evaluated, but if present, would be within the CSS habitat in the COE.

**Listing Designations**

CRPR - California Rare Plant Rank (from Rare Plant Status Review Group, jointly managed by California Department of Fish and Wildlife [CDFW] and California Native Plant Society [CNPS])

- |   |  |
|---|--|
| 1A - Plants presumed extirpated in California and either rare or extinct elsewhere  | .1 - Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)                       |
| 1B - Plants rare, threatened or endangered in California AND elsewhere              | .2 - Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)                       |
| 2A - Presumed extirpated or extinct in California, but more common elsewhere        | .3 - Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known) |
| 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                                   |  |
- CBR - Considered But Rejected

State Listing

- SE - State-listed Endangered  
 ST - State-listed Threatened  
 SR - State-listed Rare  
 SXC - Extinct in the wild; exists in cultivation.

Federal Listing

- FE - Federally-listed Endangered  
 FT - Federally-listed Threatened  
 FC - Federal candidate for listing

Other

- MSCP - an X in this column indicates the species is listed as covered by the Multiple Species Conservation Program (MSCP Plan 1998)  
 City NE/VP - an X in this column indicates the species is considered a Narrow Endemic by the City of San Diego (Land Development Manual - Biology Guidelines 2018) or is listed as a covered species in the

**ATTACHMENT F**

**Sensitive Animals with Potential to Occur on the 2734 Bordeaux Avenue Property**

**ATTACHMENT F**

SENSITIVE ANIMALS WITH POTENTIAL TO OCCUR ON THE 2734 BORDEAUX AVENUE PROPERTY USGS LA JOLLA AND DEL MAR QUADRANGLES, 70-111 METERS (231-363 FT) AMSL						
Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<b>INVERTEBRATES</b>						
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	-/FE	X	X	Vernal pools and other unvegetated ephemeral basins in Orange and San Diego Counties and Baja California. Habitat is typically < 30 cm deep and within 64 km of the Pacific Ocean. < 701 m.	Not expected to occur onsite due to lack of vernal pools or similar ephemeral ponding areas.
<i>Bombus crotchii</i>	Crotch bumble bee	SCE/-	-	-	This species is a generalist and has been reported visiting a wide variety of flowering plants; flowers with short corollas are most suitable because this species has a very short tongue; overwinters in soft, disturbed soil, or under leaf litter or other debris; nests underground (Xerces 2018).	Moderate potential to use the Site due to presence of suitable habitat for foraging, and possibly nesting and overwintering in the native habitat outside the project impact area, but 2024 protocol surveys were negative.
<i>Danaus plexippus</i>	monarch butterfly	-/-	-	-	Land with larval host plant, milkweed ( <i>Asclepias</i> spp.), or nectar plants. Overwintering habitats limited to coastal conifer or eucalyptus groves.	An overwintering population would not be expected to use Site due to lack of suitable grove. Moderate potential to nectar on flowers, small potential to lay eggs on the one non-native milkweed.
<b>AMPHIBIANS</b>						
<i>Spea hammondi</i>	western spadefoot	SSC/-	-	-	Grassland, also valley-foothill hardwood woodlands. Vernal pools or other temporary rain pools are essential for breeding and egg-laying. The pools are typically turbid with little or no cover. Activity limited to wet season (October-May, or occasionally after summer storms or during evenings with elevated substrate moisture levels; stays below ground in dry/cold weather. Burrows are probably away from the dried breeding pools. Nocturnal. Extirpated throughout much of lowland southern California.	Not expected to occur onsite due to lack of suitable breeding pools on or near the Site.
<b>REPTILES</b>						
<i>Anniella stebbinsi</i> ( <i>A. p. pulchra</i> )	southern California legless lizard (silvery legless lizard)	SSC/-	-	-	Sandy or loose loamy soils under sparse vegetation or other cover. Occasionally found in suburban gardens. Mostly subterranean and strongly prefer soils with a high moisture content.	Not expected, onsite soil is either too hard or too dry.
<i>Arizona elegans occidentalis</i>	California glossy snake	SSC/-	-	-	Various scrub and grassland habitats, often with loose or sandy soils; Peninsular Ranges.	Not expected, Site is too suburban and lacks loose soils.

ATTACHMENT F

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<i>Aspidoscelis hyperythra beldingi</i> ( <i>A. hyperythra</i> , <i>A. hyperythrus b.</i> )	orange-throated whiptail	WL/-	X	-	Low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats; prefers sandy areas with perennial plants that support termites.	Moderate; not observed, but onsite coastal sage scrub is suitable.
<i>Aspidoscelis tigris stejnegeri</i>	coastal whiptail	SSC/-	-	-	Found in hot, dry open areas with sparse vegetation; also woodland and riparian areas mostly west of the Peninsular Ranges; ground may be firm soil, sandy, or rocky.	Moderate; not observed, but onsite coastal sage scrub is suitable.
<i>Diadophis punctatus similis</i>	San Diego ringneck snake	-/-	-	-	Moist habitats including wet meadows, rocky hillsides, gardens, farmland, grassland, chaparral, mixed coniferous forests, and woodlands, along coast into Peninsular Ranges. Prefer areas with surface litter or herbaceous vegetation. Often found near abandoned buildings and junk piles in wooded areas. Generally hidden during the day. May not be distinct from San Bernardino subspecies ( <i>D. p. modestus</i> ).	Not expected, Site lacks suitable moist areas.
<i>Phrynosoma blainvillii</i> ( <i>P. coronatum b.</i> )	coast horned lizard	SSC/-	X	-	Coastal scrub, chaparral, grassland, cismontane woodland, riparian scrub and woodland; most common in lowlands along sandy washes with scattered low shrubs. Prefers open areas for sunning with loose soil for burial and native harvester ant colonies (few or no Argentine ants).	Not expected, no harvester ants observed.
<i>Plestiodon skiltonianus interparietalis</i> ( <i>Eumeces s. i.</i> )	Coronado skink	WL/-	-	-	Rocky areas and dry hillsides in coastal sage scrub, grassland, chaparral, pinyon-juniper woodland, open pine or oak woods, near streams; digs burrows in soil.	Not expected; Site is too close to development.
<i>Thamnophis hammondi</i>	two-striped gartersnake	SSC/-	-	-	In or near permanent fresh water, often along streams with rocky beds bordered by willows and other riparian vegetation, also desert oases and sometimes vernal pools. 0-2100 m.	Not expected, no permanent fresh water or vernal pools.
<i>Thamnophis sirtalis pop. 1</i> ( <i>T. s. infernalis</i> )	south coast gartersnake	SSC/-	-	-	Marsh and upland habitats near permanent fresh water with good strips of riparian vegetation; currently only known in San Pasqual Valley in SD County.	Not expected, no permanent fresh water with riparian vegetation.

**ATTACHMENT F**

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<b>BIRDS</b>						
<i>Accipiter cooperii</i>	Cooper's hawk	WL/-	X	-	Open riparian, oak, and eucalyptus woodland and other open forested areas; very tolerant of urbanization. Breed wherever there are trees, but most numerous in lowland and foothill canyons, as well as urban areas. Just as widespread over the coastal slope in winter, but more concentrated at lower elevations and in developed areas. Egg laying typically occurs late March to mid June. 150-915 m	Moderate; not observed, but could perch in eucalyptus trees on and near the Site; low nesting potential due to proximity of homes.
<i>Agelaius tricolor</i>	tricolored blackbird	ST, SSC/BCC	X	-	Highly colonial; breed and nest in freshwater marshes with cattail but also in thickets of blackberry or tall herbs. In winter, may leave breeding colonies but still prefer to roost in marshes. Present year-round in SD County.	Not expected due to lack of suitable tall marshy or thicket habitat and not detected.
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	WL/-	X	-	Year-round resident of steep, moderately vegetated slopes of coastal sage scrub dominated by <i>Artemisia californica</i> but also coastal bluff scrub and openings in chaparral (burned). Nest on the ground at the base of rocks, grass tufts, or rarely above ground in the low branches of shrubs. 0-915 m	Not expected due to density of vegetation and not detected.
<i>Artemisospiza belli belli</i> ( <i>Amphispiza b. b.</i> )	Bell's sage sparrow	WL/-	-	-	Year-round resident in open chamise chaparral and sage scrub, especially recently burned areas or on gabbro substrate; most common in central southern SD County; very sensitive to habitat fragmentation and has been eliminated from most coastal areas.	Not expected due to density of vegetation and proximity to development and not detected.
<i>Athene cunicularia</i>	burrowing owl	SSC/BCC	X	-	Open, dry annual or perennial grasslands, deserts & scrublands with low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, especially California ground squirrel. Breeding population limited in SD, more frequent in winter.	Not expected due to lack of suitable open habitat and not detected.

ATTACHMENT F

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<i>Campylorhynchus brunneicapillus sandiegensis</i>	coastal cactus wren	SSC/BCC	X	-	Year-round resident of open coastal sage scrub with thickets of chollas ( <i>Cylindropuntia</i> sp.) or prickly-pear ( <i>Opuntia</i> sp.), south- and west-facing slopes below 460 m, usually within 400 m of river valleys, also hillsides in tributary canyons, and along washes.	Not expected due to paucity of cactus cover and not detected.
<i>Charadrius nivosus nivosus</i> ( <i>C. alexandrinus</i> n.)	western snowy plover	SSC/FT, BCC	X	-	Year-round resident of immediate coast at scattered beach, bay and lagoon locations; nests on beaches, dunes and salt flats. Only two main breeding sites in SD County: Camp Pendleton and Silver Strand.	Not expected due to lack of suitable coastal habitat and not observed.
<i>Elanus leucurus</i> ( <i>E. caeruleus</i> )	white-tailed kite	FP/-	-	-	Widespread over coastal slope year-round, prefers riparian woodlands, oak groves, or sycamore groves adjacent to grassland; feeds almost exclusively on California vole.	Not expected due to lack of suitable habitat of trees near grassland.
<i>Eremophila alpestris actia</i>	California horned lark	WL/-	-	-	Year-round resident of open patches of bare land alternating with low vegetation in grasslands, montane meadows, sagebrush and open coastal plains, fallow grain fields, and alkali flats. Tolerant of disturbance, but sensitive to habitat fragmentation.	Not expected due to lack of suitable open habitat.
<i>Laterallus jamaicensis coturniculus</i>	California black rail	ST, FP/BCC	-	-	Freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat. Only persists in San Francisco Bay area, Bodega, Tomales, and Morro bays, Imperial Valley, and along the lower Colorado River.	Not expected due to lack of suitable habitat.
<i>Passerculus guttatus beldingi</i> ( <i>P. sandwichensis</i> b.)	Belding's savannah sparrow	SE/-	X	-	Year-round and sedentary resident of coastal saltmarshes dominated by pickleweed ( <i>Salicornia virginica</i> ). Nests on the ground in natural depression or scrape, primarily at the higher levels of the marsh, above the reach of the highest spring tides.	Not expected due to lack of saltmarsh habitat.

**ATTACHMENT F**

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<i>Polioptila californica californica</i>	coastal California gnatcatcher	SSC/FT	X	-	Obligate, permanent resident of coastal sage scrub especially where <i>Artemisia californica</i> dominates; up to 915 m but 90% at 305 m or lower.	High potential to forage or nest onsite; not observed, but known to occur nearby and Site is suitable.
<i>Rallus obsoletus levipes</i> ( <i>R. longirostris l.</i> )	light-footed Ridgway's rail (light-footed clapper rail)	SE, FP/FE	X	-	Year-round resident in coastal saltmarsh dominated by cordgrass and pickleweed, and also known at three freshwater sites in SD County.	Not expected due to lack of saltmarsh habitat.
<i>Sternula antillarum browni</i>	California least tern	SE, FP/FE	X	-	Coastal; nest colonially up to 4 mi inland on bare or sparsely vegetated sand beaches, alkali flats, land fills, paved areas. Usually nest in same area in successive years; tend to return to natal site to nest. Present in SD from April to September.	Not expected due to lack of open salt water or open nesting areas.
<i>Vireo bellii pusillus</i>	least Bell's vireo	SE/FE	X	-	Summer resident in riparian vegetation along rivers and larger creeks, also dry river bottoms, with both riparian canopy and a somewhat dense or shrubby understory for nesting. Also regularly uses upland scrub adjacent to riparian woodland. Present in SD from third week of March to late September.	Not expected due to lack of riparian habitat.
<b>MAMMALS</b>						
<i>Choeronycteris mexicana</i>	Mexican long-tongued bat	SSC/-	-	-	Arid habitats throughout range, urban and suburban areas in SD County. Roost in relatively well-lit caves but also crevices and man-made structures. Feed on pollen and nectar, especially of agaves and columnar cacti, and will visit hummingbird feeders. Seen in fall and winter, presumed to not breed in CA, San Diego on periphery of range. 0-500 m.	Not expected to breed onsite; moderate potential to feed at hummingbird feeders or ornamental agaves and columnar cacti on or near the Site.
<i>Euderma maculatum</i>	spotted bat	SSC/-	-	-	Rocky arid and semi-arid habitats, forested mountains to open scrublands and deserts with rocky cliffs. Roost in high rocky cliffs near expanses of open habitat. Forage near mesic and riparian areas. Very rare in SD County.	Not expected to occur onsite due to lack of suitable roosting and foraging habitat.

**ATTACHMENT F**

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<i>Eumops perotis californicus</i>	western mastiff bat	SSC/-	-	-	Strongly associated with roosting habitat: steep rocky cliffs, rock quarries, large granitic boulders and occasionally large buildings. Flies long distances and can be found foraging in coastal and desert scrub, riparian, oak woodlands, open grasslands, openings in montane pine forests, and over open water.	Not expected due to lack of roosting habitat.
<i>Lasiurus frantzii (L. blossevillii)</i>	western red bat	SSC/-	-	-	Low-elevation wooded habitats. Associated with riparian trees but also eucalyptus and tamarisk as well as orchards. Forages along rivers and streams but also forested meadow edges and sometimes parks in urban or suburban areas.	Not expected due to lack of preferred foraging or roosting habitat.
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	SSC/-	-	-	Prefers grasslands or open areas with patches of scrub of varying densities, generally absent in chaparral with closed canopy.	Not expected due to lack of grassland or open habitat.
<i>Myotis yumanensis</i>	Yuma myotis	-/-	-	-	Diverse vegetation and habitat types but most closely associated with rivers, creeks, ponds, and reservoirs. Roost in crevices, cavities, and buildings-especially those associated with water such as bridges and dams. Will also roost in live trees in suburban landscapes. Forages over open water, rivers and streams, as well as oak woodlands and native scrublands. Most common bat in SD County. < 1650 m.	Low potential to roost in landscape trees on or near the Site but preferred foraging habitat is not present nearby.
<i>Neotoma bryanti intermedia (N. lepida i.)</i>	San Diego desert woodrat	SSC/-	-	-	Coastal sage scrub and chamise chaparral to pinyon-juniper woodland (but not coniferous forest). Associated with large exposures of boulder outcrops. Houses most commonly constructed under ledges, in crevices, or within rock piles, but also at base of juniper, ceanothus, creosote bush, yucca, and clumps of prickly-pear or cholla. Nocturnal. 180-1500 m.	Not expected, no houses observed in cactus and Site lacks suitable rock outcrops.
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	SSC/-	-	-	Closely associated with roosting habitat: vertical cliffs, quarries, rocky outcrops. Does not favor any particular vegetation community for foraging.	Not expected due to lack of preferred roosts.

**ATTACHMENT F**

Species Name	Common Name	State/Federal Status	MSCP	City VP	Habitat	Potential to Occur Onsite
<i>Nyctinomops macrotis</i>	big free-tailed bat	SSC/-	-	-	Closely associated with roosting habitat: vertical cliffs, quarries, rocky outcrops, and occasionally tall buildings. Associated with coastal and desert scrub, evergreen forests, riparian, and montane woodlands. Forages over diverse habitats long distances from roosts.	Not expected due to lack of preferred roosts.
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	SSC/FE	-	-	Coastal sage scrub and grasslands with abundance of forbs but without dense cover of non-native grasses. Population in southern Camp Pendleton (Santa Margarita population) possibly only extant population in San Diego.	Not expected due to density of coastal sage scrub vegetation with relatively low forb cover.
<i>Taxidea taxus</i>	American badger	SSC/-	X	-	Persists mainly in large blocks of undeveloped land, avoids urbanization. Prefers grasslands, alluvial fans, meadows, desert, and other open areas. Requires friable soils, primarily consumes rodents. < 3600 m.	Not expected, the area is too developed and Site lacks suitable habitat.

**Listing Designations**

State Listing

SE - State-listed as Endangered  
 ST - State-listed as Threatened  
 SCE - State candidate for listing as Endangered  
 SCT - State candidate for listing as Threatened  
 FP - California Department of Fish and Wildlife Fully Protected  
 SSC - California Department of Fish and Wildlife Species of Special Concern  
 WL - California Department of Fish and Wildlife Watch List

Federal Listing

FE - Federal-listed as Endangered  
 FT - Federal-listed as Threatened  
 FC - Federal candidate for listing  
 BCC - USFWS Bird of Conservation Concern

Other

MSCP - an X in this column indicates the species is listed as covered by the Multiple Species Conservation Program (MSCP Plan 1998)  
 City VP - an X in this column indicates the species is listed as a covered species in the City's Vernal Pool Habitat Conservation Plan (2017)

**ATTACHMENT G**

**Crotch's Bumble Bee Survey Report**



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September 23, 2024

Ms. Hedy Levine  
Owner  
Athena Consulting  
P.O. Box 19714  
San Diego, CA 92159

**RE: 2024 Foraging Crotch's Bumble Bee Survey Summary Report for the 2734 Bordeaux Avenue Project, Community of La Jolla, City of San Diego, California**

Ms. Levine:

This letter report summarizes the 2024 focused surveys for foraging Crotch's bumble bee (*Bombus crotchii*) conducted by Busby Biological Services, Inc. (BBS) on behalf of Athena Consulting (Athena) for the approximately 0.91-acre 2734 Bordeaux Avenue Project (project), in the community of La Jolla, City of San Diego, California (Attachment 1: Figures 1 through 3).

The surveys for foraging Crotch's bumble bee were conducted to supplement the Biological Letter Report prepared by Athena (Athena 2024) and to determine the presence/absence of the species within the project site to be able to analyze potential project impacts to the species. The following report provides a brief description of the project location; Crotch's bumble bee species information; the historical species occurrence database search, habitat assessment, and survey methods; and the results of the historical species occurrence database search, habitat assessment, and focused surveys for the species.

## **PROJECT LOCATION & SITE DESCRIPTION**

The project includes the development of an accessory dwelling unit (ADU) with an attached guest quarters adjacent to an existing single-family residence. The project is located approximately 0.9 mile west of Interstate 5 and 0.4 mile east of the Pacific Ocean, in the community of La Jolla, City of San Diego, California (Attachment 1: Figures 1 through 2). The project site is located on the U.S. Geological Survey (USGS) La Jolla 7.5-minute quadrangle map and occurs on Assessor's Parcel Number (APN) 344-100-03-00 (Attachment 1: Figures 2 and 3). The approximate Global Positioning System (GPS) coordinates of the center of the project site are 32.86646, -117.24589.

The eastern portion of the project site is bordered by single-family residential parcels to the northeast, southwest, and east, and the western portion of the project site is bordered by native vegetation communities in the University of California conserved land to the north and undeveloped open space to the south and west. The project site is within the City of San Diego Multiple Species Conservation Program (MSCP), but outside the MSCP Multi-Habitat Planning Area (MHPA), with the closest MHPA being approximately 0.4-mile northwest (Attachment 1: Figure 3).

Elevations on the project site range from approximately 363 feet above mean sea level (amsl) at the top of the slope near the eastern boundary, to approximately 231 feet amsl in the canyon at the western boundary. The project site contains three vegetation communities and land-cover types, urban/developed land, disturbed land, and Diegan coastal sage scrub, as described briefly in the Results section (Attachment 1: Figure 4).

## **CROTCH'S BUMBLE BEE SPECIES INFORMATION**

Crotch's bumble bee is a candidate for listing by the California Department of Fish and Wildlife (CDFW; 2019), which means the CDFW is evaluating its status for potential listing, during which time the species is temporarily afforded the same protections as threatened or endangered species under the California Endangered Species Act (CESA). It occurs primarily in cismontane southern and central California, with a small number of records in northern California and southwestern Nevada (CDFW 2019).

Crotch's bumble bee utilizes a wide range of disturbed and natural habitats including, but not limited, to exotic and native grasslands, scrub lands, chaparral, desert margins, and semi-urban settings, but is most frequently found in scrub or open grassland habitats, with occurrences from sea level to at least 5,000 feet. It primarily nests underground in the vicinity of suitable nectaring habitat. It often nests in abandoned small rodent burrows but may also nest in tufts of grass, old bird nests, rock piles, or cavities in dead trees. This species feeds on the nectar of a variety of flowers, but seems to have a preference for flowers with short corolla tubes, such as milkweed (*Asclepias* spp.), deerweed (*Acmispon glaber*), pincushion (*Chaenactis* spp.), lupine (*Lupinus* spp.), phacelia (*Phacelia* spp.), sage (*Salvia* spp.), clarkia (*Clarkia* spp.), burclover (*Medicago polymorpha*), California poppy (*Eschscholzia californica*), and buckwheat (*Eriogonum* spp.; Williams et al. 2014).

Crotch's bumble bee colonies are annual, with queens hibernating during winter in soft, disturbed soil or under leaf litter or other debris (Williams et al. 2014). The queen flight period runs from February or March through October, with a peak in April, while the flight period for males and workers runs from late March through September, with a peak in early July (Thorp et al. 1983). The species has declined substantially because of habitat loss and degradation, pesticides, disease, and climate change.

## **METHODS**

This section presents the methods used to conduct the historical species occurrence database search, habitat assessment, and focused surveys for foraging Crotch's bumble bees, following the survey guidelines, titled *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (survey guidelines) and dated June 6, 2023 (CDFW 2023).

### **Historical Species Occurrence Database Search**

Prior to conducting a field habitat assessment, BBS conducted a review of historical Crotch's bumble bee records following the survey guidelines. Databases reviewed include the California Natural Diversity Database (CNDDDB; CDFW 2024c), U.S. Fish and Wildlife Service (USFWS) all species occurrences database (USFWS 2024), SanBIOS (County of San Diego 2024), iNaturalist (2024), and the Bumble Bees of North America (BBNA; Richardson 2024). In addition, BBS reviewed all available project-specific biological resource data and/or

reports. BBS used the data obtained during this background research to inform the habitat assessment and focused survey for the species.

### **Habitat Assessment**

BBS conducted a habitat assessment of the project site on foot to document potential Crotch's bumble bee foraging habitat, following the survey guidelines (CDFW 2023). Information collected during the habitat assessment included the vegetation communities, dominant plant species, and diversity and abundance of flowering plant species present. Areas included as part of the focused survey area were considered potentially suitable for Crotch's bumble bee because they contained native or non-native vegetation with sufficient nectar and pollen sources. Areas excluded from the survey area were considered unsuitable for Crotch's bumble bee because they lacked nectar or pollen sources; contained developed, landscaped, hardscaped, and heavily maintained areas; and/or contained vegetation that was too dense to be surveyed without damaging the habitat or impacting other wildlife (e.g., nesting birds).

### **Focused Surveys**

The focused surveys for foraging Crotch's bumble bee were conducted by a BBS qualified surveyor following the survey guidelines. CDFW considers a qualified surveyor to be someone with species-specific training or experience, such as coursework, bumble bee-specific workshops, and prior Crotch's bumble bee focused survey experience (CDFW 2023).

Prior to the start of the first survey, BBS notified CDFW of the intent to survey and, if necessary, to get project-specific approval for any proposed methods deviating from the survey guidelines. A qualified surveyor conducted focused surveys for foraging Crotch's bumble bee within suitable habitat that was identified during the habitat assessment. The survey guidelines require at least three rounds of surveys to be completed during the peak blooming period of potential nectar and pollen sources and during the Colony Active Period, which is the most active flight period for Crotch's bumble bee, between April 1 and August 31 (Richardson 2024; Thorp et al. 1983; Xerces Society et al. 2018).

Specific survey timing is determined on a project-by-project basis based on seasonality and when activity or foraging will most likely occur each year. Thus, the survey timing may vary depending on the location, elevation, seasonal rainfall, average ambient air temperatures, and local seasonal weather conditions. The survey guidelines recommend surveys occur 2 to 4 weeks apart, between 1 hour after sunrise and 2 hours before sunset (with target survey times between 0900 and 1300), with temperatures between 65- and 90-degrees Fahrenheit, wind less than 8 miles per hour, and with a survey rate not exceeding 3 acres per hour. While the survey guidelines state that surveys may be conducted at a rate of 3 acres per hour, the time required to pursue an observed bumble bee and obtain photographic documentation cannot be included in the survey time.

The qualified surveyor walked meandering transects through suitable habitat under suitable weather conditions, focusing on areas with the highest abundance of nectar and pollen sources and, thus, the areas with the highest potential for bumble bee observations. All potential nectar and/or pollen sources, the total percent cover of flowering plants, and all observed bee and wasp species were recorded.

The qualified surveyor used a non-lethal, photo voucher method to document any observed foraging bumble bees, as recommended in the survey guidelines. One of the non-lethal, photo voucher methods recommended involves photographing bumble bees that are foraging on vegetation, making sure to capture species-specific identifying characteristics with sufficient quality and detail. If necessary, photographs were provided to a bumble bee expert for verification of species identification.

Because the focused surveys were focused on detecting foraging bumble bees, the qualified surveyor did not search for potentially suitable Crotch's bumble bee nesting or overwintering sites because of the difficulty of finding and positively identifying these resources. However, if observed, the surveyor noted any known or potential Crotch's bumble bee nesting sites (e.g., rodent burrows, cavities, brush piles, rock piles, fallen logs) or potentially suitable overwintering habitat (e.g., leaf litter, debris piles, and/or soft soils).

## **RESULTS**

This section presents the results of the historical species database search, habitat assessment, and focused surveys.

### **Historical Species Occurrence Database Search**

Prior to conducting a database search of historical species occurrence records, BBS reviewed the Biological Letter Report prepared by Athena (Athena 2024). The Biological Letter Report determined that Crotch's bumble bee had a potential to occur based on the vegetation communities and flowering plants that occurred within the project site.

BBS conducted a database records search within 5 miles of the project site, prior to the field habitat assessment and focused survey. No historical records of Crotch's bumble bee occurred within or immediately adjacent to the project site; however, the following species records occurred within the 5-mile search area (Attachment 1: Figure 5):

- One 2024 iNaturalist research-grade observation in Carmel Valley, approximately 4.5 miles northeast of the project site (iNaturalist 2024).
- One 2024 iNaturalist research-grade observation in Sorrento Valley, approximately 2.25 miles northeast of the project site (iNaturalist 2024).
- Two 2023 iNaturalist research-grade observations in Kate Sessions Memorial Park, approximately 3.5 miles south of the project site (iNaturalist 2024).
- One 1983 CNDDDB observation in the Torrey Pines State Reserve, approximately 3.5 miles north of the project site (CNDDDB 2024).
- 11 specimens collected between 1901 and 1928 in La Jolla, displayed as one location adjacent to La Jolla Country Club, approximately 2.5 miles southwest of the project site (CNDDDB 2024; Richardson 2024).

### **Habitat Assessment**

Athena biologist Catherine MacGregor mapped vegetation communities and land cover types and documented areas of potentially suitable habitat for sensitive plants and wildlife, including Crotch's bumble bee, during the initial biological reconnaissance survey of the project site on June 8, 2023 (Athena 2024). BBS Principal Biologist Mr. Darin Busby conducted a follow up habitat assessment of the project site and a small survey buffer (i.e.,

approximately 25 feet surrounding the project site that could be visually assessed without trespassing onto other properties) during the first focused survey for Crotch's bumble bee on July 29, 2024. During the habitat assessment and survey, Mr. Busby verified that the vegetation mapping within the project site was still accurate and documented areas of potentially suitable Crotch's bumble bee foraging habitat to be included in the surveys and areas of unsuitable habitat to be excluded from the surveys.

The project site contains three vegetation communities and land-cover types, including urban/developed land, disturbed land, and Diegan coastal sage scrub (Attachment 1: Figure 4). Brief descriptions of these three vegetation communities and land cover types and whether they were included or excluded from the Crotch's bumble bee surveys are included in the following paragraphs. Photographs of the project site are included in Attachment 2.

Urban/developed land consists of permanent or semi-permanent structures that have been constructed or areas where pavement or hardscape have been installed, such that native vegetation is no longer supported. Within the project site, urban/developed land includes the residential structure and patio terraces, and the landscaped upper slope immediately west of the residential structure that has been altered with reinforcing concrete blocks, retaining walls, drains, and nonnative ornamental plantings such as Cape honeysuckle (*Tecoma capensis*), acacia (*Acacia* sp.), Brazilian pepper (*Schinus terebinthifolius*), ivy (*Hedera* sp.), bougainvillea (*Bougainvillea* sp.), and lavender (*Lavandula* sp.; Attachment 1: Figure 4). The majority of urban/developed land within the project site was excluded from the Crotch's bumble bee surveys because these areas are either devoid of vegetation or contain regularly maintained and irrigated ornamental plant species with very few nectar sources. The landscaped upper slope immediately west of the residential structure was included in the Crotch's bumble bee surveys because, despite containing reinforced concrete blocks and retaining walls, this area contained sufficient nectar and pollen sources that appeared to receive only infrequent and minor maintenance.

Disturbed land consists of areas that have been physically disturbed by previous human activity and are no longer recognizable as native or naturalized vegetation but that continue to retain a soil substrate. Within the project site, disturbed land occurs as a narrow strip in the center of the site between the vegetated developed upper slope to the east and the Diegan coastal sage scrub to the west (Attachment 1: Figure 4). It is dominated by non-native species such as sea-fig (*Carpobrotus chilensis*), acacia, eucalyptus (*Eucalyptus* spp.), ngaio (*Myoporum laetum*), bloodflower milkweed (*Asclepias curassavica*), and purple false-brome (*Brachypodium distachyon*). The disturbed land was included in the Crotch's bumble bee surveys because it contains several nectar sources.

Diegan coastal sage scrub is characterized by low, soft-woody, native subshrubs that are most active in winter and early spring, and many taxa that are drought deciduous. Within the project site, Diegan coastal sage scrub occurs in the western portion and is dominated by coastal sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), California encelia (*Encelia californica*), lemonade berry (*Rhus integrifolia*), black sage (*Salvia mellifera*), chamise (*Adenostoma fasciculatum*), and deerweed (*Acmispon glaber*; Attachment 1: Figure 4). The Diegan coastal sage scrub was included in the Crotch's bumble bee surveys because it contains several native nectar sources.

A total of approximately 1.17 acres of potentially suitable habitat with sufficient nectar and pollen sources was included in the Crotch's bumble bee survey area, including 0.74 acre

within the project site and 0.43 acre within the 25-foot survey buffer (Attachment 1: Figure 4). The majority of the developed land within the project site was excluded from the Crotch’s bumble bee surveys because these areas are either devoid of vegetation or contain regularly maintained and irrigated ornamental plant species with very few nectar and pollen sources.

### Focused Surveys

On July 26, 2024, BBS Principal Biologist Melissa Busby notified CDFW Senior Environmental Scientist Melanie Burlaza via email of the intent to conduct focused surveys for foraging Crotch’s bumble bee within the project site. Mr. Busby conducted a total of three focused survey visits for foraging Crotch’s bumble bee in suitable habitat within the project site and an approximately 25-foot survey buffer between July 29 and August 26, 2024 (Table 1). A summary of the survey conditions and results is provided below.

Mr. Busby meets the required CDFW qualifications to conduct Crotch’s bumble bee surveys because he has (1) acquired approximately 100 hours of experience surveying for foraging Crotch’s bumble bee during the 2023 and 2024 survey seasons; (2) acquired hundreds of hours of experience surveying for co-occurring aerial invertebrate species (i.e., Quino checkerspot butterfly [*Euphydryas editha quino*] and Hermes copper butterfly [*Lycaena hermes*] since approximately 2004; and (3) completed the Xerces Society/CDFW California Bumble Bee Atlas training and quiz in May 2023 and the San Diego Natural History Museum *Bombus of Southern California* workshop and quiz in March 2024.

**Table 1. Survey Dates and Conditions**

Survey	Date	Surveyor	Time		Weather			Plants in Flower (%)
					Temp (°F)	Wind (mph)	Clouds (%)	
Habitat Assessment/ Survey 1	7/29/24	D. Busby	Start	1415	70	2-4	10	10-30
			Stop	1530	71	2-4	10	
Survey 2	8/12/24	D. Busby	Start	1245	78	2-4	0	5-20
			Stop	1345	78	2-4	10	
Survey 3	8/26/24	D. Busby	Start	1110	74	3-5	0	5-10
			Stop	1210	75	3-5	0	

No Crotch’s bumble bees, nor bumble bees of any other species, were observed during the 2024 focused surveys. Five flying invertebrates were detected during the surveys, including western honeybee (*Apis mellifera*), yellowjacket (*Vespula* sp.), dragonfly (Order Odonata), monarch (*Danus plexippus*), cabbage white (*Pieris rapae*), and gray hairstreak (*Strymon melinus pudica*). Survey notes are provided in Attachment 3. In addition, no Crotch’s bumble bee nesting sites or potential overwintering sites were observed during the focused surveys.

A total of 16 native and non-native plant species were in flower during all or a portion of the focused surveys, including chamise, California buckwheat, indian-fig (*Opuntia ficus-indica*), black sage, San Diego wreath plant (*Stephanomeria diegensis*), Cape honeysuckle, Menzies’ goldenbush (*Isocoma menziesii*), sea-fig, toyon (*Heteromeles arbutifolia*), horseweed (*Erigeron canadensis*), deerweed, fascicled tarplant (*Deinandra fasciculata*), orange bush monkeyflower (*Diplacus aurantiacus*), bougainvillea, scarlet pimpernel (*Lysimachia arvensis*), and common sow-thistle (*Sonchus oleraceus*). The average cover of

plants in flower across the survey area was 20 percent during Survey 1, 15 percent during Survey 2, and 10 percent during Survey 3.

## **SUMMARY**

No foraging Crotch's bumble bees were observed within or immediately adjacent to the project site during focused surveys for the species during 2024.

Please do not hesitate to contact me at [darin@busbybiological.com](mailto:darin@busbybiological.com) or 858.334.9508 if you have any questions.

Sincerely,



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Darin Parker  
Principal Biologist/Owner  
Busby Biological Services, Inc.

## **Attachments**

- Attachment 1: Figures
- Attachment 2: Project Site Photographs
- Attachment 3: Survey Notes

## **REFERENCES**

- Athena Consulting (Athena)
  - 2024 Biological Letter Report for 2734 Bordeaux Avenue, La Jolla, CA 92037; APN 344-100-03-00; Prepared for the City of San Diego, PRJ-1087614. May 13.
- California Department of Fish and Wildlife (CDFW)
  - 2019 Evaluation of the Petition from the Xerces Society, Defenders of Wildlife, and the Center for Food Safety to List Four Species of Bumble Bees as Endangered Under the California Endangered Species Act. April 4.
  - 2023 Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6.
  - 2024 California Natural Diversity Database (CNDDDB). Accessed July.
- County of San Diego (County)
  - 2024 SanBIOS GIS Database. Available at: <http://www.sangis.org>. Accessed July.
- iNaturalist
  - 2024 iNaturalist database. <https://www.inaturalist.org>. Accessed July.

Richardson, L.L.

2024 Bumble Bees of North America Occurrence Records Database.  
<https://www.leifrichardson.org/bbna.html>. Accessed July.

Thorp, R. D.S. Horning, Jr., and L.L. Dunning

1983 Bumble Bees and Cuckoo Bumble Bees of California. Bulletin of the California Insect Society Volume 23.

United States Fish and Wildlife Service (USFWS)

2024 All Species Occurrences Database. Accessed July.

Williams, P., Thorp, R., Richardson, L., and Colla, S.

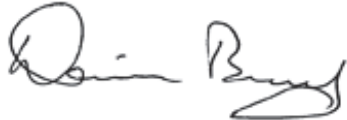
2014 Bumble Bees of North America. Princeton University Press. 208pp.

The Xerces Society for Invertebrate Conservation (Xerces Society), Defenders of Wildlife, Center for Food Safety

2018 Petition to List the Crotch bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (*Bombus occidentalis occidentalis*) as an Endangered Species.

## PROJECT BIOLOGIST SIGNATURE PAGE

All biologists performing focused surveys for foraging Crotch's bumble bee met the qualifications per the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). The undersigned biologists certify this report to be a complete and accurate account of the findings and conclusions of the 2024 surveys.



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Darin Busby  
Principal Biologist/Owner  
Busby Biological Services, Inc.

## **ATTACHMENT 1 – FIGURES**

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Source: National Geographic, Esri

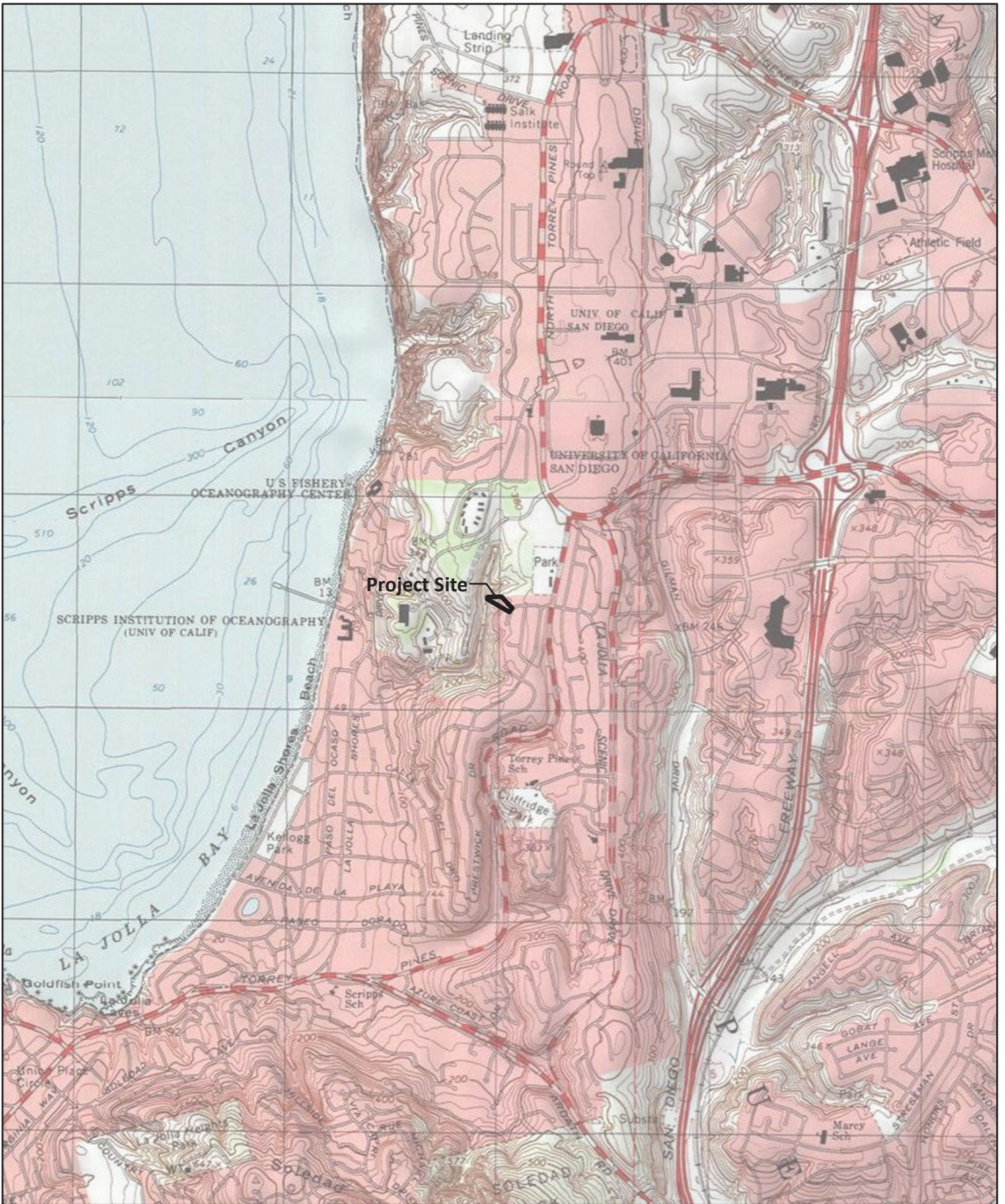
## Regional Location

2734 BORDEAUX AVENUE PROJECT

**BUSBY**  
Biological Services

0 2.5 5  
Miles

Figure 1



Source: USGS 7.5' Quadrangles (La Jolla, Del Mar)

### Project Location (USGS)

2734 BORDEAUX AVENUE PROJECT

**BUSBY**  
Biological Services

0 1,000 2,000  
Feet

N

Figure 2



Aerial Photo: USDA NAIP 2022

**BUSBY**  
Biological Services

0 500 1,000  
Feet

### Project Location (Aerial)

2734 BORDEAUX AVENUE PROJECT

Figure 3



Source: Athena Consulting; Aerial Photo: Nearmap 2024

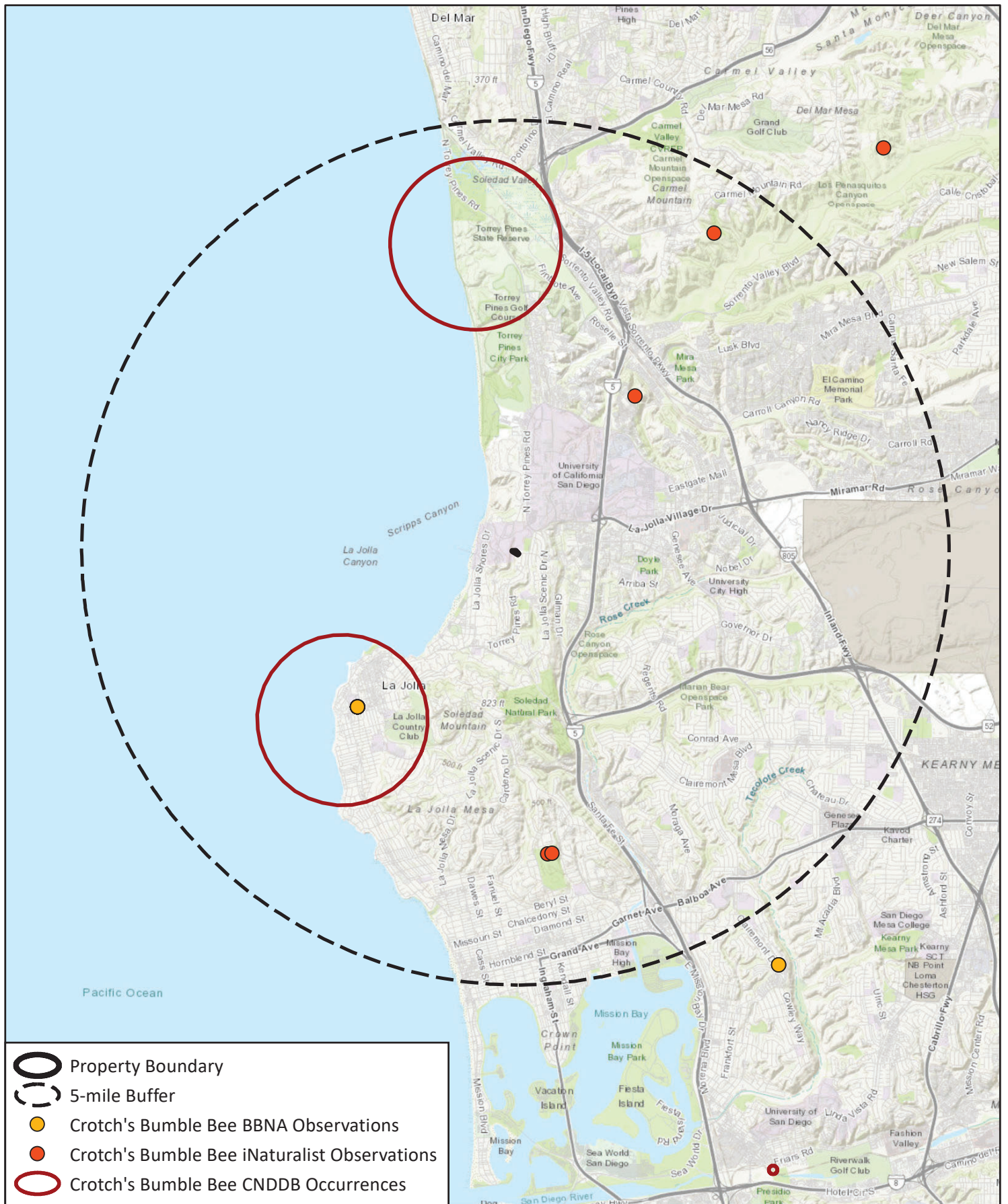
**2024 Crotch's Bumble Bee Survey Results**






2734 BORDEAUX AVENUE PROJECT

**BUSBY**  
Biological Services

0 25 50 Feet

**Figure 4**



-  Property Boundary
-  5-mile Buffer
-  Crotch's Bumble Bee BBNA Observations
-  Crotch's Bumble Bee iNaturalist Observations
-  Crotch's Bumble Bee CNDDB Occurrences

Source: CDFW, iNaturalist GBIF, BBNA; Basemap: Esri Topographic Map

## Historical Occurrences Database Records

2734 BORDEAUX AVENUE PROJECT



**BUSBY**  
Biological Services

0 0.75 1.5  
Miles

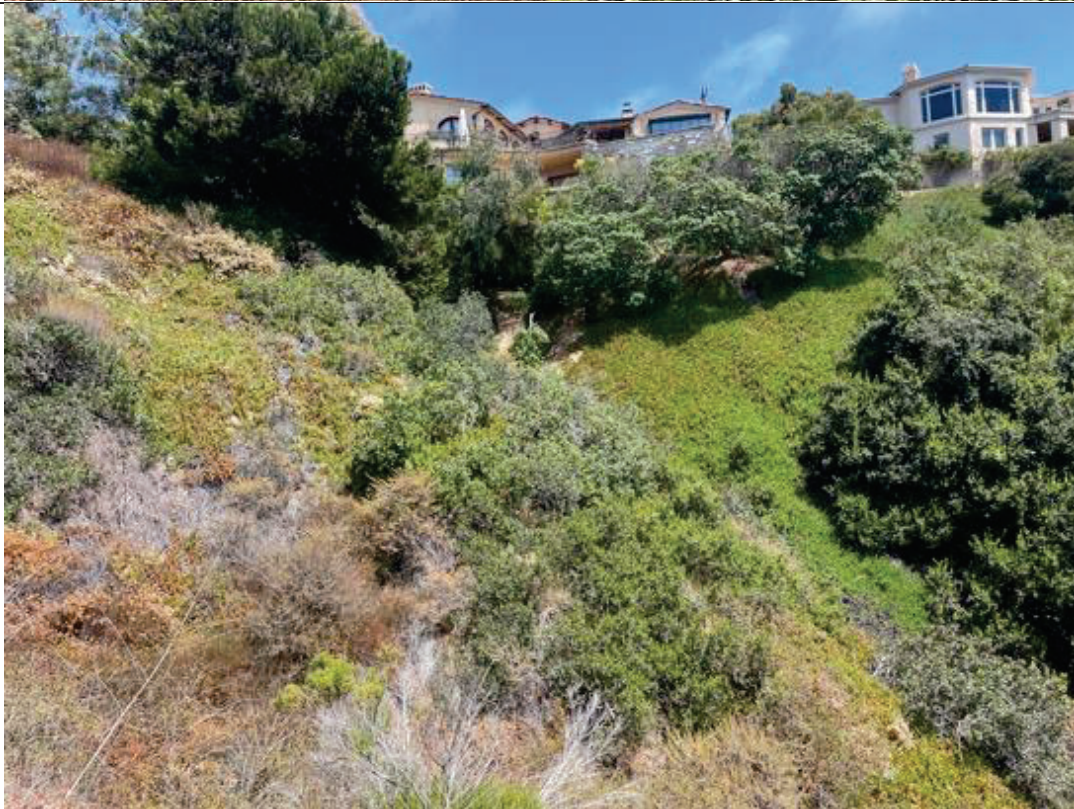
Figure 5

## **ATTACHMENT 2 – PROJECT SITE PHOTOGRAPHS**

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Photograph 1. Diegan coastal sage scrub in western portion of project site and urban/developed land in eastern portion of project site (View east; July 29, 2024).



Photograph 2. Diegan coastal sage scrub in western portion of project site and disturbed land and urban/developed land in central and western portion of project site (View east; July 29, 2024).



Photograph 3. Diegan coastal sage scrub in western portion of project site (View west; July 29, 2024).



Photograph 4. Disturbed land in central portion of project site and Diegan coastal sage scrub in western portion of project site (View north; August 26, 2024).

## **ATTACHMENT 3 – SURVEY NOTES**

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## 7/29/24: Bordeaux CBB Survey 1

Start: 1415, 70f, 2-4mph, 10%cc

End: 1530, 71f, 2-4mph, 10^cc

Surveyor:

Darin Busby

Inverts:

Honey bee 50

Monarch 2

Yellow jacket 10

Gray hairstreak 2

Dragonfly 3

Habitat:

Developed, disturbed, CSS

Flowers (20% average cover across site):

ADE FAS

ERI FAS

OPU FAS

SAL MEL

STE DIE

TEC CAP

ISO MEN

CAR CHI

HET ARB

ERI CAN

ACM GLA

DEI FAS

DIP AUR

Bougainvillea

LYS ARV

SON OLE

## 8/12/24: Bordeaux CBB Survey 2

Start: 1245, 78f, 2-4mph, 0%cc

End: 1345, 78f, 2-4mph, 10%cc

Surveyor:

Darin Busby

Inverts:

Monarch 4

Honey bee 20

Dragonfly 2

Cabbage white 2

Grey hairstreak 1

Habitat:

Developed, disturbed, CSS

Flowers (15% average cover across site):

OPU FIC

ERI FAS

DEI FAS

ISO MEN

CAR CHI

MIM AUR

HET ARB

HET GRA

STE DIE

TEC CAP

Bougainvillea

LYS ARV

SON OLE

## 8/26/24: Bordeaux CBB Survey 3

Start: 1110, 74f, 3-5mph, 0%cc

End: 1210, 75f, 3-5mph, 0%cc

Surveyor:

Darin Busby

Inverts:

Monarch 2

Honey bee 20

Dragonfly 2

Habitat:

Developed, disturbed, CSS

Flowers (10% average cover across site):

ERI FAS

OPU FIC

CAR CHI

TEC CAP

Bougainvillea sp.

ERI CAN

LYS ARV

SON OLE

ISO MEN

HET ARB

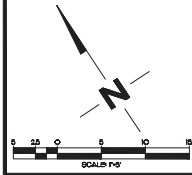
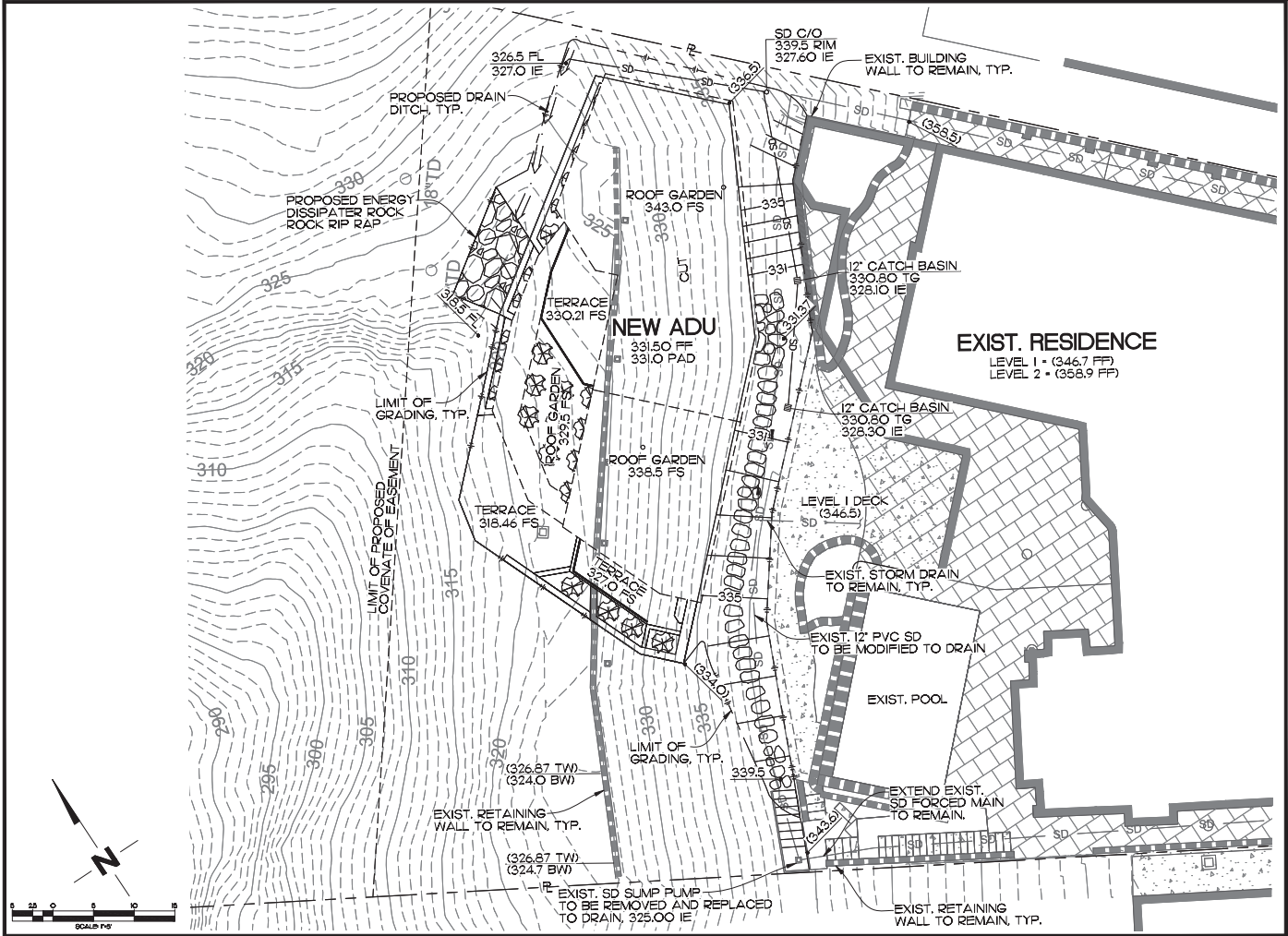
DEI FAS

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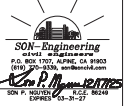
## **ATTACHMENT H**

### **Detail of Disturbance Areas and Features**





ENGINEER OF WORK



STAMP

**BORDEAUX AVENUE ADU**

2734 Bordeaux Avenue, La Jolla, CA 92037

NO.	DESCRIPTION	DATE
01	REVISION	01/15/2024
02	REVISION	03/22/2024
03	REVISION	03/22/2024
04	REVISION	03/22/2024
05	REVISION	03/22/2024

SHEET NAME  
**CONCEPTUAL GRADING PLAN**

PROJECT NO. SCN2403404  
DATE 25 APRIL 2024  
DRAWN BY SCN  
CHECKED BY SCN  
SHEET NUMBER

**C200**

**ATTACHMENT I**

**Crotch's Bumble Bee Avoidance Measure**

## CONDITION OF APPROVAL

### Avoidance Measure for Crotch's Bumble Bee June 25, 2024

#### **Biological Resources (Avoidance Measure for Crotch's Bumble Bee)**

Should this species no longer be a potential candidate for listing at the time of the preconstruction meeting, then no avoidance measures shall be required.

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions (FOR PUBLIC UTILITY PROJECTS: prior to the preconstruction meeting), but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental Designee shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction permit (FOR PUBLIC PROJECTS: add to the white book):
  2.
    - a. To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 through August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity (defined as any habitat disturbance) survey no more than three days prior to the initiation of construction activities to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.
    - b. A Qualified Biologist must demonstrate the following qualifications: at least 40 hours of experience surveying for bee or other co-occurring aerial invertebrate species (such as Quino checkerspot butterfly) and have completed a Crotch's bumble bee detection/identification training by an expert Crotch's bumble bee entomologist; or the biologist must have at least 20 hours of experience directly observing Crotch's bumble bee.
    - c. The pre-activity survey shall consist of photographic surveys following California Department of Fish and Wildlife (CDFW) guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023). The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained.

If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee, then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific

Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable.

- d. If pre-activity surveys identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW. Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area). Take of any endangered, threatened, candidate species that results from the project is prohibited, except as authorized by State law (Fish and Game Code section 86, 2062, 2067, 2068, 2080, 2085; California Code Regulations, Title 14, section 786.9) under CESA.
- e. Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.