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Project Title:	Enterprise Emergency Peaker Project - Compliance
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Document Title:	Supplemental Petition for Post-Certification Amendment, Appendices D and E
Description:	Provides the Applicant's Supplemental Petition submittal for Post-certification Amendment Appendices D and E, which include the Biological Resources Technical Report provided as Appendix D and the Cultural Resources Technical Report (Public Version) provided as Appendix E.
Filer:	Grace Myers
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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APPENDIX D

BIOLOGICAL RESOURCES TECHNICAL REPORT

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March 7, 2025
Project No. 24-16971

Enterprise BESS LLC
4350 Executive Drive, Suite 320
San Diego, California 92121

Subject: Biological Resources Technical Report to Support CEC Supplemental Petition for Post-Certification Amendment for the Enterprise BESS Project in Escondido, San Diego County, California

Dear Enterprise BESS LLC,

This report documents the findings of a biological resources literature review, reconnaissance-level field surveys, and protocol-level biological surveys conducted by Rincon Consultants, Inc. (Rincon) for the proposed Enterprise Battery Energy Storage System (BESS) Project (Project). This report was originally submitted to the California Energy Commission (CEC) in March 2024 as part of the Petition for Post-Certification Amendment (Petition) to add a nominal 52-megawatt (MW) BESS to the existing Enterprise Emergency Peaker Project (EEPP). The layout of the proposed Project was modified following submittal of the March 2024 Petition, and this supplemental study analyzes the revised Project. Please note that this Biological Resources Technical Report supersedes the original assessment dated March 4, 2024.

The currently proposed Project is located in Escondido, California (Attachment A, Figure 1). The Project includes interconnection-related facilities that are co-located with the existing CalPeak Power EEPP within the northern portion of Assessor's Parcel Number (APN) APN 232-410-45-00 at 201 Enterprise Street. The Project also includes 52 MW of BESS facilities to be installed on an approximately 0.82-acre site located at 2361 Auto Park Way on APNs 232-410-21-00, 232-410-20-00, and 232-410-19-00. The BESS facilities will be connected to the low side of the existing generation step-up (GSU) transformer at the EEPP via a short gen-tie to be installed on an above ground cable tray.

The proposed Project interconnection facilities are located within the northern portion of the existing CalPeak Power – EEPP, a 49.5-MW, gas-fired power plant licensed by the CEC in June 2001 under emergency provisions (CEC Docket No. 01-EP-10). The existing EEPP is interconnected to the San Diego Gas and Electric (SDG&E) Escondido Substation to the north via an underground 69-kilovolt (kV) transmission line. The currently proposed Project is planned to be licensed via a Supplemental CEC Petition to the EEPP Certification as confirmed by the CEC in 2024.

Project Description

The proposed Project would support California's current need for additional electrical supply capacity during high peak load demand periods. The proposed Project would utilize approximately 0.1 acre of available open areas within the northern portion of the overall 2.94-acre EEPP parcel, plus approximately 0.82 acre of additional land on three parcels to the north on the south side of Auto Park Way. The Project would involve installation of containerized battery systems with internal heating, ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. The Project includes an approximately 350-foot-long, 13.8-kV gen-tie line supported on aboveground cable tray to connect the BESS to the existing EEPP switchyard

GSU transformer. Installation of the cable tray may require the removal of up to five of the existing, mature Canary pine trees (*Pinus canariensis*) on the northern EEPP perimeter that were planted as part of the required landscaping plan when the EEPP was licensed in 2001. The elevated cable tray would be supported on pile foundations and/or concrete pads. Access to the EEPP is via the existing peaker plant entrance on Enterprise Street and the access to the northern BESS parcels is via the adjacent Auto Park Way.

Project-related improvements on the northern portion of the EEPP parcel include installation of: (1) gen-tie on elevated cable tray; (2) elevated switchgear platform; and (3) electrical and communication line connections in the EEPP switchgear area, including the low side of the GSU. Minor excavations associated with equipment foundations would be required.

Development of the northern BESS parcels would require: (1) demolition of the existing auto body shop facilities; (2) grading, site preparation, and foundation installation for BESS facilities; (3) installation of an up to 18-foot-tall retaining wall near the southern border of the northern parcels area to stabilize the vertical cut near the property line that is associated with removal of the existing hillside to create an expanded level pad area for the Project. The Project development plan includes the installation of sheet piles along the southern border of the northern parcels to stabilize the cut slope prior to installation of the retaining wall.

The Enterprise BESS would be connected to the electrical grid via the existing GSU at the EEPP, which has an existing 69-kV connection to the SDG&E Escondido Substation to the north. The Project would not require any high voltage modifications at the EEPP switchyard or the existing off-site 69-kV line. Operation of the BESS facility would be integrated with the existing EEPP, but the BESS would be charged from the electrical grid and not the EEPP. The BESS and the EEPP may be operated simultaneously in accordance with the market-optimized dispatch instructions received from the California Independent System Operator's Automated Dispatching System, but the combined output would be control-limited to never exceed the limit of the Generator Interconnection Agreement.

The Project would require discretionary permitting involving approval of a Supplemental CEC Petition. It is understood that discretionary permitting with the City and/or County would not be required.

The Project's operational life and associated land leases are anticipated to be up to 40 years. As a part of the original licensing of the EEPP Project, a biological technical analysis and site surveys were conducted (Helix Environmental Planning, Inc. [Helix] 2001) covering the entire parcel inclusive of the proposed Project. The 2001 report established biological Conditions of Certification (CoC) for the EEPP. Our report documents existing biological conditions at the Project and evaluates the potential for the Project to impact sensitive biological resources such as special-status species, sensitive habitats, and aquatic resources. Where impacts are identified, this report also recommends CoCs or other measures that may be required to address biological impacts.

Project Location

The currently proposed Project is located in the City of Escondido, California (Attachment A, Figure 1). The Project includes interconnection related facilities that are co-located with the existing CalPeak Power EEPP within APN 232-410-45-00 at 201 Enterprise Street. The Project also includes 52 MW of BESS facilities to be installed on an approximately 0.82-acre site located at 2361 Auto Park Way on APNs 232-410-21-00, 232-410-20-00, and 232-410-19-00. The 0.82-acre BESS site was most recently used as the Auto Art Paint & Body business until January 2025. The Project Area is defined as the combined 1.98-acre Project Area encompassing all four APNs as defined in Attachment A, Figure 2.

The Project Area is bound by industrial/commercial land uses to the north, northwest, east, and south. The area between Citracado Parkway to the west and the EEPP and Auto Park Way parcels to the east is undeveloped land with the exception of transmission infrastructure. Other land uses in the area include the Palomar Medical Center directly across Citracado Parkway, single-family residential approximately 1,100 feet to the northwest, 1,700 feet to the southwest, as measured from the Project Area boundary, and north and northeast across State Route 78 and east of the Interstate 15.

Historical Permitting Background Summary

The EEPP is a nominal 49.5-MW, simple-cycle, natural gas-fired peaking facility. EEPP was reviewed under Public Resources Code section 25705, which granted the CEC emergency permitting authority, as well as Executive Order D-26-01, issued February 8, 2001, and Executive Order D-28-01 issued on March 7, 2001. In Executive Orders D-26-01 and D-28-01, the Governor ordered the CEC and other relevant state and local agencies to expedite review of proposed thermal power plants for construction and operation on an emergency basis by September 30, 2001. The Governor also declared that these Projects were emergency projects under Public Resources Code section 21080(b)(4) and were thereby exempt from the requirements of the California Environmental Quality Act (CEQA). The CEC Final Decision included a provision that would allow for the certification to be extended for the life of the Project, provided that the CoCs were current and in compliance, the Project was permanent in nature, and air emission credits were in place. On April 11, 2012, the CEC approved the extension (TN64745) of the EEPP for the life of the facility, until such time that it ceases operations and commences permanent closure activities, which means the CoCs issued for the project remain binding until the facility closure.

Key CEC licensing related documents for the EEPP include:

- Application for Certification Pursuant to 21-Day Emergency Permitting Process, CalPeak Enterprise #7, CalPeak Power, LLC, May 7, 2001
- CalPeak Enterprise #7 Escondido (01-EP-10) Staff Assessment for Emergency Permit, June 1, 2001
- CalPeak Enterprise #7 Escondido (01-EP-10), Application for Certification Final Decision, June 6, 2001

Regulatory Background

Regulatory authority over biological resources is shared by federal, state, and local authorities under a variety of statutes and guidelines. Primary authority over biological resources normally lies with the local government. However, because the project is on the site of the EEPP, a CEC-licensed facility, the CEC will administer all state and local requirements for the project. The EEPP was reviewed under Public Resources Code section 25705, which granted the CEC emergency permitting authority, Executive Order D-26-01, issued February 8, 2001, and Executive Order D-28-01 issued on March 7, 2001.

The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources throughout the state and has direct jurisdiction under the California Fish and Game Code (CFGC). Under the California Endangered Species Act and federal Endangered Species Act (CESA and ESA, respectively), the CDFW and the United States (U.S.) Fish and Wildlife Service (USFWS) have direct regulatory authority over species formally listed as Threatened or Endangered as well as native, bird species listed under the Federal Migratory Bird Treaty Act (MBTA), CFGC and Bald and Golden Eagle Protection Act. The U.S. Army Corps of Engineers has regulatory authority over waters of the U.S.,

including wetlands, under Section 404 of the Clean Water Act. The CDFW and Regional Water Quality Control Board protect streams, lakes, and associated riparian habitat and waters of the State, respectively, at the state level. The analysis in this report is guided by the requirements of these laws, and by the operating standards of the implementing agencies as found in detail in Attachment B.

Federal Regulations

- ESA
- Federal Clean Water Act
- MBTA

State Regulations

- CEQA
- CESA
- CFGC
- Porter-Cologne Water Quality Control Act

Local Regulations

- City of Escondido General Plan
- City of Escondido Grading Ordinance

Multiple Habitat Conservation Program

The San Diego Multiple Habitat Conservation Program (MHCP) is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in northwestern San Diego County. Its goal is to conserve approximately 19,000 acres of habitat, of which roughly 8,800 acres (46 percent) are already in public ownership and contribute toward the habitat preserve system for the protection of rare, threatened, or endangered species (AMEC Earth & Environmental, Inc. [AMEC] et al. 2003a, 2003b).

The MHCP Final Environmental Impact Statement/Environmental Impact Report were adopted and certified by the San Diego Association of Governments (SANDAG) Board of Directors on March 28, 2003. A Subarea Plan for the City of Escondido has been prepared but not yet adopted (City of Escondido 2001). The Subarea Plan would need to be adopted by the City and implementing agreements with CDFW and USFWS would need to be signed before incidental take permits (ITP) could be issued. No ITPs are anticipated for this Project.

Although the City's MHCP Subarea Plan has not been adopted, the MHCP forms an appropriate basis for assessing the biological impacts of the Project as discussed below.

City of Escondido Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan

The City of Escondido Draft Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (Draft Subarea Plan) comprehensively addresses how the City will conserve natural biotic communities and sensitive plant and wildlife species. The City's Draft Subarea Plan is not formally approved and adopted, so all projects are required to obtain applicable permits for impacts to federally

listed species as per Section 4D, 10(a) or Section 7 (or Section 10) of the ESA. Also, because the City does not have an approved Subarea Plan, the mitigation requirements for impacts to the biological resources are based on ratios provided by the approved MHCP (AMEC et al. 2003a, 2003b). Although the Draft Subarea Plan has not yet been approved, the plan has been used by the City as a guide for open space design and preservation.

Biological Core and Linkage Areas

The MHCP identifies Biological Core and Linkage Areas (BCLA) as those areas determined biologically valuable for inclusion in the regional preserve system (AMEC et al. 2003a, 2003b). BCLAs were designed to conserve sensitive species and corridors between areas of high-quality habitat and to provide avenues for wildlife movement between these areas.

Covered Species

A Covered Species is a species for which take authorization would be provided under the MHCP because long-term viability was determined to be adequately maintained under a particular preserve system design. The federal action addressed in the MHCP is the issuance of ITPs for all species on the Covered Species list whether they currently are listed or are to be listed in the future. The MHCP Covered Species include 15 plant species and 32 wildlife species.

The MHCP Subarea Plan for Escondido has not been approved or adopted; therefore, this report uses this MHCP as baseline for discussion but is not applicable to Covered Species for this Project. No ITPs are anticipated for this Project.

Methods

The work described in this report includes a review of relevant literature and background information, field reconnaissance and protocol-level surveys, and a consistency analysis of the proposed Project in relation to current site conditions and the status of biological resources protected under applicable federal, state, and local regulations. To account for design modifications made since the previous report, this analysis also evaluates the Project's consistency with prior findings. The potential for special-status species to occur within the Project Area was assessed through a literature review and field surveys focused on evaluating habitat suitability. The Survey Area is defined as the Project Area plus a 300-foot buffer, as shown in Attachment A, Figure 3.

Literature Review

Prior to any field surveys, Rincon conducted background research to preliminarily characterize the nature and extent of biological resources on and adjacent to the Project Area. Rincon reviewed Project aerial photographs and previous historical land use of the Project. The literature review included queries of the CDFW California Natural Diversity Data Base (CNDDB, CDFW 2025a), USFWS Biogeographic Information and Observation System (USFWS 2025a), and California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS 2025a) for special-status species occurrences within the *Escondido, California* U.S. Geological Survey (USGS) 7.5-minute quadrangle and the surrounding eight quadrangles, were conducted to obtain comprehensive information regarding state and federally listed species, as well as other special-status species considered to have potential to occur within a 5-mile radius of the Project. For CNPS query purposes, a nine-quadrangle search area centered on the Project was used.

Other resources reviewed included:

- USFWS National Wetlands Inventory (USFWS 2025b)
- National Hydrography Dataset (USGS 2025)
- United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil; Survey (USDA NRCS 2025a)
- USFWS Critical Habitat Portal (USFWS 2025c)
- Biogeographical Information and Observation System (CDFW 2025b)
- Special Vascular Plants Bryophytes, and Lichens List (CDFW 2025d), and Special Animal List (CDFW 2025c)
- Multiple Habitat Conservation Program for the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Bach and Vista, Volumes I and II (SANDAG 2003)
- SANDAG SanGIS *Parcel Lookup Tool* was reviewed to determine areas designated in the MHCP Subarea Plan (SANDAG 2022)
- Natural Community Conservation Plan for the City of Escondido (City of Escondido 2001)
- The City of Escondido General Plan (City of Escondido 2012)
- Documentation previously prepared for the project, including biological reports (Helix 2001), survey data, and vegetation maps. Previous aerial photographs, topographic maps, geologic maps, climatic data in the area were also examined

Field Surveys

Reconnaissance Level Surveys

Biological resource reconnaissance-level surveys were conducted within the Survey Area, encompassing the entire Project Area and Survey Buffer, where accessible. The surveys assessed habitat suitability for potential special-status species, mapped existing vegetation communities and land cover types, and identified any evident sensitive biological resources on-site. Additionally, the presence of potential jurisdictional waters or wetlands were documented, and all observed plant and wildlife species were recorded.

Rincon Biologist Jacob Hargis, conducted a pedestrian survey on May 11, 2023, from 9:00 a.m. to 12:30 p.m., under calm and clear conditions, with temperatures ranging from 54–62°F and wind speeds of 2–4 mph. A supplemental survey was conducted by Rincon Biologist Casey Clark on October 16, 2023, from 8:00 a.m. to 12:00 p.m. Additionally, Rincon Biologist Molly Morrissey, conducted a survey on the northern three parcels in the Study Area on October 12, 2024, after conducting a tree survey on the site. (Table 1).

The biologists walked the entirety of the EEPP and all accessible areas within the Survey Area to achieve 100 percent visual cover. Wildlife species observed directly or detected from calls, tracks, scat, nests, or other signs were documented. Zoological nomenclature for birds is in accordance with the Cornell Lab of Ornithology (Cornell University 2023); for mammals using Mammals of California (Wilson and Reeder 2005); and for amphibians and reptiles using Society for the Study of Amphibians and Reptiles' Checklist of the Standard English Names of Amphibians & Reptiles (2023).

The biologists searched for special-status plants that would have been identifiable during the time of the survey; however, a focused rare plant survey was not conducted. All plant species observed in the Survey Area were noted, and plants that could not be identified in the field were identified later using

taxonomic keys (Baldwin et al. 2012). The reconnaissance-level biological surveys included a directed search for special-status plants that would have been apparent at the time of each survey.

The assessment of special-status species in this report is based on the results of the site visit and literature review and is intended to assess habitat suitability and potential for the proposed Project to impact special-status species within the Survey Area. The surveys were conducted to provide an initial evaluation regarding the presence or absence of terrestrial biological resources, including plants, birds, and other wildlife; however, focused protocol surveys were not conducted during the reconnaissance-level biological surveys. Representative site photos from these surveys are included in Attachment C.

Arborist Surveys

A series of protocol tree surveys were conducted and overseen by a certified Arborist. All mature and protected trees within the Study Area were overseen by Rincon International Society of Arboriculture Board Certified Master Arborist Nate Faris (IN-3274B) and Certified Arborist Casey Clark (#WE-12031A) on June 6, 7, and October 16, 2023 (Table 1). An additional survey was conducted on October 12, 2024 by Rincon biologist Molly Morrissey. A copy of the arborist report is included as Attachment D.

Table 1 Field Surveys

Date	Time (24-hour)	Surveyors	Survey Type	Air Temperature (degrees Fahrenheit)	Wind Speed (miles per hour)	Weather Notes
May 11, 2023	0900 to 1230	Jacob Hargis	Reconnaissance	54–62	0–3	Clear
October 16, 2023	0800 to 1200	Casey Clark	Reconnaissance	51–85	0–3	Clear
June 6, 2023	0700 to 1700	Nate Faris	Arborist	60–85	0–10	Overcast
June 7, 2023	0700 to 1200	Nate Faris	Arborist	60–85	0–10	Overcast
October 16, 2023	0800 to 1200	Casey Clark	Arborist	60–70	0–5	Sunny
October 12, 2024	0745 to 0930	Molly Morrissey	Arborist and Reconnaissance	58–62	0–5	Sunny

Coastal California Gnatcatcher Protocol Surveys

USFWS protocol breeding coastal California gnatcatcher (CAGN, *Polioptila californica californica*) surveys were conducted as recommended by the CoC BIO-7, included in the CEC permit for the EEPP and to support the application for the March 2024 CEC Petition. The surveys were conducted within suitable CAGN habitat and survey findings for the protocol breeding surveys that were conducted from April 19, 2023, through May 24, 2023, were negative. A formal CAGN survey report was submitted to USFWS on July 7, 2023 (Rincon 2023) and is included as Attachment E.

Additionally, USFWS protocol non-breeding CAGN surveys were conducted between October 17, 2023, and February 13, 2024. The survey results of all nine protocol non-breeding surveys were negative. The second and final CAGN survey was submitted to USFWS in March 2024 (Rincon 2024) and is included as Attachment E.

Survey Limitations

Areas where access was restricted, including private/inaccessible property (SDG&E Palomar Energy Center Substation) to the south were surveyed with binoculars. The detection of wildlife species was

limited by seasonal and temporal factors. The surveys were conducted in the early spring and fall. Spring is an optimal breeding season for wildlife and blooming periods for plant species. Fall is not the optimal period to observe potentially occurring winter migrants. The surveys were performed during daylight hours; therefore, the identification of nocturnal animals was limited to sign detection if present within the Survey Area.

Existing Conditions

Topography and Soils

Elevation within the Project ranges from 770 feet above mean sea level for the sloped area from the south, 750 feet from the northern boundary for the Project, sloping down to 735 feet in the southeastern portion. The Project contains steep sloped areas with vegetation to the south and undeveloped vegetated land to the west. The topography of the Survey Area and its immediate surroundings is characterized primarily by undeveloped property, industrial and commercial uses, substations, and active roadways. Based on the most recent USDA NRCS (USDA NRCS 2025a, 2025b) soil survey for Escondido, California (USDA NRCS 2025a, 2025b), the Survey Area contains one soil map unit with varying percent slopes (Table 2) (Attachment A, Figure 4).

Vista Coarse Sandy Loam typically occurs on hilly, sloping elevations and mountainous uplands with slopes ranging from 2–75 percent. The soil is derived from material weathered from decomposed granitic rocks. It is considered well-drained with slow to rapid run-off and moderately rapid permeability. This soil makes up the entire Survey Area with 5–9 percent slopes in the northern portion and 9–15 percent encompassing the southern portion of the Survey Area.

Table 2 Soils within the Survey Area

Soil Type	Acreage within Survey Area	Acreage within Project Area[1]
Vista coarse sandy loam, 5–9 percent slopes	9.01	1.46
Vista coarse sandy loam, 9–15 percent slopes	8.02	0.52
Total	**17.03**	**1.98**

[1] This is the area within the 1.98-acre Project Area only.

Vegetation and Land Cover Types

The Survey Area is in a highly industrialized and commercially developed area, and most of the Project Area has been graded in the past or is currently developed. Landscaped berm areas, consisting of mainly ornamental coniferous trees, such as Canary Island pines provide a visual buffer along the northern, northeastern, and northwestern boundaries of the Project. Several western sycamore trees (*Platanus racemosa*) were observed just outside of the eastern and southeastern boundaries. Additionally, one large old growth coast live oak (*Quercus agrifolia)* is located near the Enterprise Street entrance to the Project. A small stand of dense scrub oaks (*Quercus* sp.). was observed within the Survey Area, directly south of the large mature oak tree. These scrub oaks appeared to intergrade with adjacent sage scrub and were mixed in with ornamental pines. The western portion of the Survey Area contains one patch of Diegan Coastal Sage Scrub and two patches of Disturbed Diegan Coastal Sage Scrub, with non-native grassland mixing in between the shrub cover. The Project Area within the existing CalPeak Power EEPP is entirely fenced with heavy duty fence line and razor wire. The area surrounding the Project Area is characterized by commercial and industrial uses, power generation, undeveloped land, and established roadways to the north and west. The habitat within the Project Area

has retained some structure based on the 2001 data (Helix 2001), in addition to some larger areas outside of the Project Area, within the Survey Area, consisting of mixed non-native grassland, disturbed, and ornamental communities. The Diegan Coastal Sage Scrub, within the Survey Buffer, has become more disturbed with the increased establishment of non-native grasses, annual weeds, and forbs.

Vegetation classification was based on the classification systems provided in the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008) to provide consistency with the SANDAG MHCP and modified as appropriate to reflect the existing site conditions. Where applicable, vegetation communities were further classified using *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009) to better identify the species composition and provide consistency with CDFW classifications. Sensitive vegetation community ranking is based on MHCP habitat groups (SANDAG 2003). The MHCP designates six habitat group categories:

- Group A Wetland Communities
- Group B Rare Upland
- Group C Coastal Sage Scrub
- Group D Chaparral
- Group E Annual Grassland
- Group F Other

Six vegetation/land cover types were observed in the Survey Area: 1) urban/developed; 2) Disturbed habitat); 3) Non-native grassland; 4) Ornamental; 5) Diegan Coastal Sage Scrub; and 6) Disturbed Diegan Coastal Sage Scrub (Attachment A, Figure 5). Of these, five vegetation communities occur within the Project Area and are described below; Disturbed Diegan Coastal Sage Scrub, non-native grassland, urban/developed, and ornamental. Vegetation classification was based on the classification systems provided in the Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008); and modified as appropriate to reflect the existing site conditions (Table 3).

Table 3 Vegetation Community/Land Cover Types within the Survey Area

Habitat Group	Vegetation Community/ Land Cover Type (Holland Code)	Acreage within Survey Area	Acreage within Project Area[2]	Sensitive
C	Disturbed Diegan Coastal Sage Scrub (32500)	0.12	0.00	Yes
C	Diegan Coastal Sage Scrub (32500)	0.97	0.00	Yes
E	Non-native grassland (42200)[1]	1.02	0.00	Yes
F	Urban/Developed (12000)	11.10	1.25	No
F	Disturbed Habitat (11300)	1.97	0.22	No
F	Ornamental	1.85	0.51	No
Total		**17.03**	**1.98**	

[1] Based on Oberbauer et al. 2008

[2] This is the area within the 1.98-acre Project Area only.

Diegan Coastal Sage Scrub (32500)

This vegetation community does not occur within the Project Area, but 0.97 acre is located within the Survey Buffer. Diegan Coastal Sage Scrub is a vegetation community featuring Diegan Coastal Sage Scrub species, such as bush sunflower (*Encelia* Californica), California sagebrush (*Artemisia*

californica), with coyote brush *(Baccharis pilularis*), deerweed (*Acmispon glaber*), lemonade berry (*Rhus integrifolia*) and California buckwheat (*Eriogonum fasiculatum*).This community was found to be mixed with non-native grassland species, ornamentals, and other non-native annual and perennial weedy species such as salt cedar (*Tamarix* sp.*),* thistles, and wild radish (*Raphanus raphanistrum*).

Species in this vegetation community were found distributed in higher densities within the open spaced habitat within the Survey Buffer to the west of the Project Area.

Disturbed Diegan Coastal Sage Scrub (32500)

This vegetation community does not occur within the Project Area, but 0.12 acre is located within the Survey Buffer. This community is structurally similar to Diegan Coastal Sage Scrub but has been subjected to historical anthropogenic disturbance from land use practices, most likely resulting from the initial construction of the EEPP building and fence installation. Patches of Disturbed Diegan Coastal Sage Scrub are located on the top of slope near the southwestern Project Area and as corridor just outside the southern Project Area. The ground cover between the shrub layer is dominated by non-native and invasive grasses and weeds such as wild oat, mustards (*Brassica* sp.) and bromes (*Bromus* sp.). Dominant shrub species include California buckwheat, California sagebrush, lemonade berry (*Rhus integrifolia)* coyote brush, and deerweed, and herbaceous species such as storksbill (*Erodium cicutarium*), Spanish clover (*Acmispon americanus*), willow dock (*Rumex salicifolius*), sandysoil suncup (*Camisonnia strigulosa),* dotseed plantain (*Plantago erecta*), and two-color rabbit tobacco (*Pseudognaphalium biolettii*) observed along the disturbed slope.

Non-native (Annual) Grassland (42200)

This vegetation community does not occur within the Project Area, but 1.02 acres is located within the Survey Buffer. The non-native grassland is located towards the southwest of the Survey Area with clusters of Diegan Coastal Sage Scrub, Disturbed Diegan Coastal Sage Scrub, and Disturbed Habitat throughout. As defined by Oberbauer et. al., Non-native (or annual) grassland consists of a dense to sparse cover of annual grasses with flowering culms 0.2–0.5 (1 meter) high. A typical community of non-native grassland consists of a mix of annual grasses such as *avena, Bromus, Erodium,* and *Brassica* as common indicators. Non-native grasslands occur on fine textured or often clay soils with oak woodlands adjacent in on better drained soils (Oberbauer et. al. 2008).

This community is mostly consistent with the 2001 study. The dominant annual grassland species within the Survey Area include wild oat, mustards, bromes, with perennial herbaceous species that include storksbill, fennel (*Foeniculum vulgare*), and thistles (*Centaurea* sp.).

Urban/Developed (12000)

This community comprises 1.25 acre within the Project Area and 9.85 acres within the Survey Buffer. Areas considered urban/developed within the Survey Area have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, roadways, and landscaped areas that often require irrigation. Areas where no natural land is evident due to large amounts of debris or other materials being placed upon it may also be considered Urban/Developed (e.g., frequently used equipment storage areas). Consistent with results from the 2001 study, this land cover type comprises the active power plant and associated access road, equipment staging areas, bare ground areas, and ornamental vegetation, as well as surrounding roads, substations, transmission poles, developments, and roadways within the Survey Area.

Disturbed Habitat (11300)

This community comprises 0.22 acre within the Project Area and 1.75 acres within the Survey Buffer. Areas mapped as disturbed habitat contain a cover of highly disturbed annual, non-native grasses such as red brome (*Bromus rubens*), wall barley (*Hordeum murinum*), black mustard (*Brassica nigra*), false brome (*Brachypodium distachyon),* redstem filaree (*Erodium cicutarium*), and slender oat (*Avena barbata*). Oberbauer et al. describes these areas as "areas that have been physically disturbed (by … human activity) and are no longer recognizable as a native or naturalized vegetation association, but continue to retain a soil substrate." Typically, vegetation, if present, is "nearly exclusively composed of non-native plant species such as ornamentals or disturbance-adapted ruderal exotic species or shows signs of past or present animal usage such as grazing, that removes any capability of providing viable natural habitat for uses to wildlife other than dispersal" (Oberbauer et. al. 2008). Examples of disturbed land include areas that have been graded, repeatedly cleared for fuel management purposes and/or have experienced repeated use that prevents natural revegetation (i.e., dirt parking lots, trails that have been present for several decades), recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old homesites.

Disturbed habitat was observed along the southern slope of the EEPP, within patches throughout the Survey Area, as well as distributed within developed, ornamental, Non-native Grassland, and Diegan Coastal Sage Scrub communities. The disturbance along the southern slope has impacted the naturally occurring vegetation community, which is limited, establishing primarily non-native plant species adapted to disturbances, including slender oat, shortpod mustard (*Hirschfeldia incana*), bromes (*Bromus* sp.), sow thistle (*Sonchus oleraceus*) fennel (*Foeniculum vulgare),* prickly lettuce (*Latuca serriola*), and jersey cudweed (*Pseudognaphalium luteoalbum*). Some native species are dispersed throughout the disturbed habitat, including California sage brush, deerweed, common yarrow (*Achillea millefolium*) and black sage (*Salvia mellifera*).

Ornamental

This vegetation community comprises 0.51 acre within the Project Area and 1.34 acres within the Survey Buffer. Ornamental vegetation within the Survey Area includes numerous Canary Island palms, paperbark trees (*Melaleuca quinquenervia*), as well as red tip photinias (*Photinia fraseri*), day lilies and other manicured ornamentals. Denser stands of pine trees provide a visual buffer around the north, northeastern, and northwestern boundaries of the Project and were observed along the eastern and western portions of the SDG&E Escondido Substation.

General Wildlife

The Survey Area and its surroundings provide habitat for wildlife species that commonly occur in urbanized and disturbed habitats within San Diego County. Wildlife species observed/detected on or adjacent to the site include Cooper's hawk (*Accipiter cooperii*; CDFW Watch List), red-tailed hawk (*Buteo jamaicensis*), California towhee (*Pipilo crissalis*), Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), song sparrow (*Melospiza melodia*), American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), house finch (*Haemorhous mexicanus*), house wren (*Troglodytes aedon*), black phoebe (*Sayornis nigricans*), northern mockingbird (*Mimus polyglottos),* hooded oriole (*Icterus cucullatus*), and lesser goldfinch (*Spinus psaltria*). Several old small rodent burrows were observed, but no indication of any larger mammal burrows was present.

Special-Status Biological Resources

This section examines the sensitive biological resources within the Survey Area and assesses its potential to support special-status biological resources

Special-Status Species

Local, state, and federal agencies regulate special status species and may require an assessment of their presence or potential presence to be conducted prior to the approval of proposed development on a property. Assessments for the potential occurrence of special-status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB species occurrence records from other sites in the vicinity of the Survey Area, and previous reports for the Survey Area. The potential for each special-status species to occur within the Survey Area was evaluated according to the following criteria:

- **Not Expected.** Habitat on and adjacent to the Survey Area is clearly unsuitable for the species' requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime). The species is not analyzed further in this letter report.
- **Low Potential.** Few of the habitat components meeting the species' requirements are present, and/or the majority of habitat on and adjacent to the Survey Area is unsuitable or of very poor quality. The species is not likely to be found within the Survey Area and therefore is not analyzed further in this letter report.
- **Moderate Potential.** Some of the habitat components meeting the species' requirements are present, and/or only some of the habitat on or adjacent to the Survey Area is unsuitable. The species has a moderate probability of being found within the Survey Area.
- **High Potential.** All of the habitat components meeting the species' requirements are present and/or most of the habitat on or adjacent to the Survey Area is highly suitable. The species has a high probability of being found within the Survey Area.
- **Present.** Species is observed on the site or has been recorded (e.g., CNDDB, other reports) within the Survey Area recently (within the last 5 years).

For the purpose of this report, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS or the National Marine Fisheries Service under the ESA; those listed or candidates for listing as Rare, Threatened, or Endangered under the CESA or Native Plant Protection Act; those identified as Fully Protected by the CFGC (Sections 3511, 4700, 5050, and 5515); those identified as Species of Special Concern (SSC) by the CDFW; and plants occurring on lists 1 and 2 of the CNPS California Rare Plant Rank system per the following definitions:

- **Rank 1A** = Plants presumed extinct in California
- **Rank 1B.1** = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- **Rank 1B.2** = Rare or endangered in California and elsewhere; fairly endangered in California (20–80 percent occurrences threatened)
- **Rank 1B.3** = Rare or endangered in California and elsewhere, not very endangered in California (less than 20 percent of occurrences threatened, or no current threats known)
- **Rank 2** = Rare, threatened or endangered in California, but more common elsewhere

Results

A query of the CDFW CNDDB and CNPS Inventory identified 73 special-status wildlife species, and 113 special-status plant species documented within the Escondido, California USGS 7.5-minute quadrangle and the eight surrounding quadrangles, encompassing a radius of over 10 miles. All 186 species were evaluated for their potential to occur within the Survey Area (Attachment F).

Special-Status Wildlife Species

This section discusses and evaluates the potential for the Survey Area to support special-status wildlife species. Assessments for the potential occurrence of federal and state listed species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB and other species occurrence records from other sites in the vicinity of the Survey Area, previous reports for the Project, and the results of the surveys of the Survey Area.

The database queries and literature review performed for the Project indicated 73 special status wildlife species have been documented within the *Escondido, California* USGS 7.5-minute quadrangle and eight surrounding quadrangles (*San Marcos, Valley Center, Rodriquez Mountain, Rancho Santa Fe, San Pasqual, Del Mar, Poway,* and *San Vicente Reservoir*).

The review of biological databases resulted in the identification of 34 special-status wildlife species occurring within 5 miles of the Survey Area. Of these, Rincon determined that 15 species have at least a low potential to occur due to the presence of suitable habitat in the Survey Area (Attachment F).

One special status-status wildlife species, an adult male Cooper's hawk (*Accipter cooperii*), was observed within the Project Area during the reconnaissance-level biological field surveys. CAGN has low potential to occur within the Survey Area based on the presence of suitable habitat, but no observations have been recorded incidentally or during protocol surveys (Rincon 2023, 2024)

Nesting Birds and Raptors

The Survey Area contains suitable nesting habitat for a variety of native avian species protected by the MBTA and CFGC Section 3503. The Survey Area contains marginal quality, but suitable habitat for special-status species such as CAGN and contains suitable stands of large coniferous trees that could be utilized by Cooper's hawks. Generally, most native bird species that could nest on or adjacent to the Project do not have a special-status designation but are addressed herein based on the protections afforded under the MBTA and CFGC, and the potential for impacts to active nests during the nesting season. The nesting season generally extends from February through September but can vary based upon annual climatic conditions. Species of birds common to the area that typically use open disturbed habitats for foraging, including scrub, oak trees, or landscaped trees for nesting habitat, such as northern mockingbird, house wren, song sparrow, American crow, lesser goldfinch, mourning dove, Anna's hummingbird, California towhee, or red-tailed hawk were detected during the reconnaissance-level biological surveys.

Coastal California Gnatcatcher

CAGN, a federally threatened, SSC, and MHCP-covered species, is an obligate, permanent resident of Coastal Sage Scrub below 2,500 feet in Southern California. This species occurs in low Coastal Sage Scrub in arid washes and on mesas and slopes.

The Survey Area supports marginally suitable habitat for CAGN; therefore, protocol surveys were recommended by CEC CoC BIO-7 in accordance with USFWS requirements (USFWS 1997) to further evaluate if any CAGN are using the site.

USFWS protocol breeding surveys were conducted by Helix (2001) prior to the original construction of the EEPP Project; however, survey results were negative. An updated series of presence/absence protocol breeding surveys were conducted within and adjacent to the current Survey Area in 2023 by Rincon's qualified biologist Kelly Rios, a Section 10(a)(1)(A) permitted biologist (TE 018909-6). Surveys commenced following the 15-day notification period. The surveys were conducted within the breeding season and adhered to the frequency requirements outlined in the current USFWS survey protocol (last revised June 26, 2019). Surveys were conducted from April 19, 2023, through May 24, 2023, to further evaluate any potential CAGN territories that could be affected by short-term Project construction activities, including vegetation clearance, long-term habitat loss, and indirect impacts. In accordance with the USFWS survey protocol, a minimum of six breeding season surveys were conducted at least one week apart prior to anticipated construction timeline for the Project. The results of the survey were negative and were submitted to USFWS on July 7, 2023, in a formal CAGN survey report (Rincon 2023) included as Attachment E.

Additional USFWS protocol non-breeding CAGN surveys were conducted by Ms. Rios to address updates to the Project design. The protocol non-breeding surveys were conducted within the non-breeding season and adhered to the frequency requirements outlined in the current USFWS survey protocol (last revised June 26, 2019). Surveys began on October 17, 2023, and were completed on February 13, 2024. In accordance with the USFWS survey protocol, a minimum of nine surveys were conducted at least two weeks apart. Surveys commenced following the 15-day notification period. The results of the survey were negative and a second and final formal CAGN survey report was submitted to USFWS in March 2024 (Rincon 2024), included as Attachment E.

Cooper's Hawk

Cooper's hawk is a CDFW Watch List (WL) and MHCP-covered species that is typically found in woodland, and forested habitats and is found throughout urban landscapes where cover and prey are available. They typically nest in riparian growths of deciduous trees, oaks, canyon bottoms, and pines. The Survey Area contains songbird prey availability with adjacent tree and shrub habitat to the north, south, central, and west. An adult male Cooper's hawk individual was observed emerging from a Canary Island pine tree and perching and vocalizing along the southern fence line. A pair was not observed during the reconnaissance-level biological surveys. There was no evidence of an active nest or behavior suggesting a nest was present within the Survey Area; however, based on the suitable nesting and foraging habitat within the Survey Area, this species has potential to occur as a transient or could potentially nest in the surrounding woodland or ornamental habitat.

Special-Status Plant Species

No federal or state listed plants were observed during the reconnaissance-level biological field surveys. A protocol botanical survey for all species was not performed, and the reconnaissance surveys were conducted outside the bloom period for some of these species. The database and literature review performed for the Project indicated that 113 special-status plant species have been documented within the *Escondido, California* USGS 7.5-minute quadrangle and eight surrounding quadrangles. A total of 26 species that have been recorded to occur within 5 miles of the Project were also reviewed and assessed during the reconnaissance surveys. These species inhabit various ecosystems, including vernal pools, riparian woodlands and forests, meadows, and native perennial grasslands, none of

which were observed within the Survey Area. However, the Survey Area does include disturbed areas associated with sage scrub habitats.

Based on the habitat assessment of the site and special-status plant habitat requirements, four special-status plant species were determined to have a low potential to occur within the Survey Area. The majority of the Survey Area has been previously developed with structures and roads or by the installation of concrete v-ditches and fencing for the operation and maintenance of the EEPP. Historical aerial imagery shows that the Survey Area has been historically maintained, mowed, and graded in association with its industrial uses. The Project Area contains only disturbed habitat and ornamental trees, neither of which provides more than marginally suitable habitat for any special-status plant species with potential to occur in the region.

Given the existing and historical site conditions, lack of suitable habitat, and domination of non-native plant species, it is unlikely for any special-status plant species to occur within the Survey Area (Attachment F).

Sensitive Vegetation Communities

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW maintains a list of plant communities that are considered sensitive. Three native vegetation types were documented to occur within the Survey Area.

Large areas of Diegan Coastal Sage Scrub (DCSS) exist within the western portion of the Survey Area, outside of the Project Area and disturbed DCSS exists as small patches at the top of the slope near the southern portion of the Survey Area. These communities fall within the City's "coastal sage scrub" habitat group C and type (SANDAG 2003), which is considered a sensitive habitat group. Since these vegetation communities are located outside of the Project Area, no direct or indirect impacts are anticipated.

Non-native (annual) grassland vegetation communities occur in the west and southwestern portions of the Survey Area, where they are interspersed among clusters of Diegan Coastal Sage Scrub, Disturbed Diegan Coastal Sage Scrub, and Disturbed Habitat. This vegetation community is considered sensitive, and ecologically important for a variety of plant and animal species, including the CAGN's use of these annual grasslands, predominately consisting of non-native grasses, in north county, as a mosaic to forage within the coastal sage scrub community (SANDAG 2003). While this community falls within the City's habitat Group E and is considered sensitive under CEC CoC BIO-10. However, as this vegetation is located outside of the Project Area, no impacts are expected.

Critical Habitat

Federally Designated Critical Habitat does not occur within the Survey Area.

Aquatic Resources

Concrete stormwater v-ditches, approximately 3 feet wide, are present within the Survey Area, running along the CalPeak Power EEPP fence line to the south, the southwestern slope, and the western portion of the fence line. These features likely function to capture sheet flow from rainfall, provide erosion control, and channel water offsite. Stormwater appears to flow into an old drainage basin near the intersection of Citracado Parkway and Auto Park Way before dispersing off-site. These concrete-lined ditches only convey local runoff during storms and lack habitat value. They are not considered

jurisdictional waters of the United States, waters of the State, or streambeds as defined by resource agency regulations. No jurisdictional waters are present within the Survey Area.

Habitat Connectivity and Wildlife Corridors

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, and areas with vegetation cover provide corridors for wildlife travel.

The Project is located outside of any Multiple Habitat Conservation Areas, Focused Planning Areas, or BCLAs. Finally, the Project is not within or adjacent to an essential connectivity area or natural landscape block as identified by the California Essential Habitat Connectivity Project (Spencer et al. 2010, CDFW 2025e). The areas surrounding the Project are developed, and the site is not situated in an area that would be conducive to use as a movement route for wildlife making local or regional movements.

Impact Analysis and Mitigation Measures

This section discusses the potential impacts to biological resources that may occur from implementation of the Project. Impacts are considered in the context of the required CoCs from the 2001 CEC license, and additional mitigation measures are recommended where needed. Construction-related activity and non-paved ground disturbance from the Project would involve grading, road construction, and battery storage facilities; these Project related activities are not anticipated to impact any sensitive vegetation communities. Applicable CoCs developed for the original EEPP Project would be required conditions under the licensing of the Project and would be implemented. The CoCs include conditions BIO-1 through BIO-11, which read as follows:

BIO-1 The Project permitted under this emergency process will avoid all impacts to legally protected species and their habitat on-site, adjacent to the site and along the right of way for linear facilities.

BIO-2 The Project permitted under this emergency process will avoid all significant non-mitigatable impacts to designated critical habitat (wetlands, vernal pools, riparian habitat, preserves) on-site or adjacent to the site.

BIO-3 The Project permitted under this emergency process will avoid all impacts to locally designated sensitive species and protected areas.

BIO-4 The Project permitted under this emergency process will reduce risk of large bird electrocution by electric transmission lines and any interconnection between structures, substations and transmission lines by using construction methods identified in *Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996* (APLIC 1996).

BIO-5 The Project biologist, a person knowledgeable of the local/regional biological resources, and Compliance Project Manager (CPM) will have access to the site and linear rights-of-way at any time prior to and during construction and have the authority to halt construction in an area necessary to protect a sensitive biological resource at any time.

BIO-6 Upon decommissioning the site, the biological resource values will be reestablished at preconstruction levels or better.

BIO-7 Prior to any site mobilization a USFWS approved biologist will conduct protocol surveys of the project site and the construction laydown area for coastal California gnatcatchers.

BIO-8 Prior to any Project-related activities that will occur during the raptor breeding season (March 15–August 15), a qualified biologist will conduct surveys of the Project site and the surrounding habitat within a 0.5-mile radius of the Project Area. Survey methodologies will allow for a thorough search of these areas to identify potential arboreal and/or ground nesting raptor species.

BIO-9 The Project biologist, prior to site mobilization, will fence off all sensitive natural resource areas including all DCSS habitat. The Project biologist will then be present onsite during construction until a date determined by the CPM. Finally, the Project biologist, along with the CPM will perform a site review for sensitive habitat impacts at the end of construction.

BIO-10 Prior to any operational activities, the applicant will submit a report of any impacted habitat to the CPM for review. The applicant will then develop mitigation compensation plans using a 2:1 ratio for DCSS and a 0.5:1 ratio for non-native (or annual) grassland.

BIO-11 At a time to be determined by the CPM, the applicant will develop a restoration plan for impacts resulting from grading and other activities within the construction laydown area.

Impacts to Special-Status Wildlife Species

Impact-1 Special Status Wildlife Species

One special-status species, an adult male Cooper's hawk, was observed flying through the Project Area and perching on the southern fence within the Survey Area. No active nests, or evidence of nesting was observed during the reconnaissance-level biological surveys. Injury or mortality of individual Cooper's hawks due to contact with construction equipment is unlikely, as these hawks are highly mobile and would likely move out of the path of equipment. However, Cooper's hawks may nest in the trees along the Survey Area's northern and western borders. If trees are removed during the nesting season, nests may be removed and Cooper's hawks or their eggs/young could be injured or killed if development activities occur in this area. This impact would be avoided through existing CoC BIO-8, which requires pre-construction raptor surveys if work occurs during the nesting season, and CoC BIO-2 which requires impact avoidance for protected species. In addition, CoC BIO-5 enables the Project Biologist and Compliance Manager to access the site at any time during construction and to halt construction activities if necessary to protect resources. Implementation of these CoCs, along with Recommended Condition BIO-12 described below, would ensure that impacts to Cooper's hawk are less than significant and that the project complies with federal and state laws related to the take of raptors and their nests.

Recommended Condition BIO-12 The applicant shall have a Worker Environmental Awareness Program (WEAP) for the construction crew that will be developed and implemented by a qualified biologist. Each employee (including temporary, contractors, and subcontractors) shall receive the WEAP training on the first day of working on the proposed Project. They will be advised of the potential impact to the listed species and the potential penalties for taking such species. At a minimum, the WEAP will include the following topics: occurrence of the listed and sensitive species in the area, their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of federal and state laws, reporting requirements, and Project features designed to reduce direct and indirect impacts to these species, including nesting birds, and promote continued successful occupation of the Project Area environs.

Impact-2 Nesting Birds or Raptors

The Survey Area contains suitable foraging and nesting habitat for birds protected by the MBTA. Nesting birds and raptors are protected by the CFGC and the MBTA and have the potential to occur within the Project Area or larger Survey Area. If nesting birds are present on-site during construction, they could be affected directly (injury or mortality of individuals) or indirectly (construction noise, dust, and other human disturbances) by Project activities. The Project could adversely affect raptors and other nesting birds if construction occurs while they are present on or adjacent to the site through direct mortality or abandonment of nests due to factors such as noise, dust, nighttime lighting, human presence/disturbance, and an increase in predators. The loss of an active nest due to construction activities could be a violation of CFGC Sections 3503, 3503.5, 3513, and the MBTA. Impacts on common avian species would not rise to the level of a significant impact, and existing CoCs for the Project would ensure compliance with these laws.

CoC BIO-8 requires a focused nesting bird and raptor survey during the breeding season (March 15–August 15), CoC BIO-5 allows the Project Biologist to enter the site at any time and to temporarily halt construction if needed to protect resources. A WEAP is recommended to be implemented for the Project as described in Recommended Measure BIO-12, and part of the WEAP would be the discussion of nesting birds and defining a “no-work” buffer that would be established for any active nests that are within or near the Project. With the implementation of these measures, the impacts to nesting birds and raptors would be less than significant.

Protocol CAGN breeding season surveys were conducted by Kelly Rios, a Section 10(a)(1)(A) permitted biologist (TE 018909-6) with Rincon, in 2023 and 2024. Six surveys were conducted one week apart from March through May 2023, all with negative results. Additional protocol CAGN non-breeding season surveys were conducted by Kelly Rios from October 2023 to February 2024, also yielding negative results. The Project Area does not contain suitable habitat for CAGN and that protocol surveys confirmed the species' absence within the adjacent habitat.

Impacts to Special-Status Plant Species

No special-status plants were observed on-site during the reconnaissance-level biological surveys, and none have more than low potential to occur on-site as the Project lacks potentially suitable habitat for special-status plants known to occur in the area. Therefore, no impacts to special-status plant species are expected. Thus, the Project would comply with CoC Bio-3 regarding sensitive plants. Implementation of CoC BIO-5, which allows a biologist to visit the site and verify compliance, would further ensure that impacts do not occur.

Impacts to Sensitive Natural Communities

No Sensitive Natural Communities are present within the Project Area; therefore, no impacts are anticipated to occur. Indirect impacts to sensitive communities beyond the Project Area are not expected. All natural and open space areas outside of the proposed Project Area would be avoided. The use of any invasive, noxious, or exotic plant species near adjacent sensitive habitat communities would be restricted. If a landscaping plan is prepared for the Project, native species would be recommended to minimize the introduction or spread of non-native, exotic, and invasive species to adjacent habitats.

Impacts to Jurisdictional Waters and Wetlands

No impacts to jurisdictional waters or wetlands are anticipated, as these features do not occur within the Survey Area.

Impacts to Wildlife Movement

The Project is not situated within a wildlife movement corridor and is in a developed setting. Furthermore, the site is relatively small and has existing chain-link fencing that precludes access by medium and large wildlife species. The proposed Project would not have a significant impact on wildlife movement. The proposed Project could result in an increase in lighting. All lighting would be directed away from any open space areas, which include the natural habitats to the north and west sides of the Project Area, similar to adjacent residential developments. Minimizing light pollution into adjacent habitat areas would preserve the ability for wildlife to use these habitats as movement routes.

Impacts Related to Local Policies and Ordinances

The Conservation and Open Space Element of the City's General Plan includes policies related to the protection of biological resources. The applicable policies, as well as the Project's consistency with these policies are presented below:

- **Policy 1.6:** Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, mitigation of resources either on- or off-site at ratios consistent with state and federal regulations, and in coordination with those agencies having jurisdiction over such resources.

Based on the results of our desktop review and field survey efforts, no significant wetlands, riparian, or woodland habitats, nor rare, threatened, or endangered plant or animal species or their habitats, were identified within the project area. As a result, no impacts to these resources are anticipated, and avoidance or mitigation measures are not required.

- **Policy 1.7:** Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species, and habitat types of unique or limited distribution, and/or visually prominent vegetation.

Reconnaissance-level biological surveys were conducted by a qualified biologist in May and October of 2023 to assess the proposed Project impacts to address and identify special-status species and/or sensitive habitats with a potential to occur within the Survey Area. Per CoC BIO-7, protocol CAGN breeding season surveys were conducted by Kelly Rios, a Section 10(a)(1)(A) permitted biologist (TE 018909-6) with Rincon. Six surveys were conducted one week apart from March through May 2023 with negative results. Additional protocol CAGN non-breeding surveys were conducted by Kelly Rios October 2023–February 2024, with negative results as well.

- **Policy 1.8:** Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.

CoC BIO-9 required a biologist present prior to site mobilization, to fence off or flag any additional Diegan Coastal Sage Scrub and/or non-native (annual) grassland habitat outside of the anticipated impact areas. With the implementation of CoC BIO 10, the Project would mitigate impacts to these habitats through on-site preservation, off-site acquisition, in lieu fees, a purchase of credits from an approved mitigation bank, or a combination thereof. Additionally, no impacts are expected due to the design of the Project and the presence of a monitor during construction activities. Therefore, implementation of the Project does not conflict with this policy.

- **Policy 1.9:** Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.

A protocol tree survey was conducted by a certified arborist and an arborist report was prepared which evaluates the existing conditions of the trees within and adjacent to the Project Area. A copy of the arborist report is included as Attachment D. The implementation of the proposed Project is anticipated to result in minor and severe impacts to four ornamental trees and substantial impact (removal) to eight ornamental trees. These include three Queen palm trees (*Syagrus romanzoffiana*) associated with the electrical equipment pad, and five Canary Island pine associated with the cable tray. For the proposed removal of the eight trees, if on-site replanting is proven to not be possible, planting off-site is another feasible alternative along with the purchasing of credit into an off-site mitigation bank such as the Daley Ranch Conservation Bank in the City or the donation of funds into a local agency, such as the Resource Conservation District of Greater San Diego County that plants and maintains native trees. The purchased mitigation credit or donated funds should be at the same cost as the estimated total cost of replacement for the removal trees (at the same caliper and species plus installation and maintenance).

Conclusion

In conclusion, habitat conditions within the Project Area have declined since the 2001 analysis due to new development in the surrounding area, habitat fragmentation, and assumed EEPP site maintenance. Despite these changes, the Project is anticipated to comply with the CEC's CoCs.

Designated Critical Habitat is not present within the Survey Area and CAGN protocol surveys, conducted from April to May 2023 and again from October 2023 to February 2024, resulted in no detections. Therefore, the Survey Area is considered unoccupied. Additionally, the Project's electrical design is expected to align with APLIC (1996) guidelines for recommended spacing of electrical components.

Eight mature trees have potential to be substantially impacted (removal) due to proposed Project activities. Per the Grading Ordinance, each mature tree must be replaced at a 1:1 ratio, and protected trees at a 2:1 ratio, requiring a total of eight replacement trees. On-site replacement with suitable native species is preferred, but off-site replacement within City limits is permitted.

If construction occurs during the avian breeding season (February 15–September 15), a preconstruction nesting bird survey—including a focused raptor survey (March 15–August 15)—would be conducted. A qualified biologist familiar with the Project would be present during vegetation removal and grading to ensure compliance with biological resource protections. Furthermore, a WEAP would be developed and implemented before site mobilization. A qualified biologist would also be on-site during construction to delineate work limits and prevent impacts on sensitive biological resources.

With the implementation of CoC Measures BIO-1 through BIO-11 and the recommended Measure BIO-12, the Project is expected to fully comply with the CoCs outlined in the CEC licensing for the EEPP.

Limitations, Assumptions, and Use Reliance

This Biological Resources Assessment has been performed in accordance with professionally accepted biological investigation practices conducted at this time and in this geographic area. The biological investigation is limited by the scope of work performed. The reconnaissance biological survey for certain taxa may have been conducted as part of this assessment but were not performed during a particular blooming period, nesting period, or particular portion of the season when positive identification would be expected if present, and therefore, cannot be considered definitive. In addition, general biological (or protocol) surveys do not guarantee that the organisms are not present and will not be discovered in the future within the site. In particular, mobile wildlife species could occupy the site on a transient basis or re-establish populations in the future. Our field studies were based on current industry practices, which change over time and may not be applicable in the future. No other guarantees or warranties, expressed or implied, are provided. The findings and opinions conveyed in this report are based on findings derived from site reconnaissance, review of CNDDB RareFind5, and specified historical and literature sources. Standard data sources relied upon during the completion of this report, such as the CNDDB, may vary regarding accuracy and completeness. In particular, the CNDDB is compiled from research and observations reported to CDFW that may or may not have been the result of comprehensive or site-specific field surveys. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research and analysis.

Sincerely,
Rincon Consultants, Inc.

Ben Chubak
Biologist

Andrea Maben
Project Manager

Christopher Julian
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Attachments

Attachment A Project Figures
Attachment B Regulatory Setting
Attachment C Representative Site Photographs
Attachment D Arborist Report (March 2025)
Attachment E Coastal California Gnatcatcher Protocol Survey Reports (July 7, 2023 and March 1, 2024)
Attachment F Special-Status Species Evaluation Tables

References

AMEC Earth & Environmental, Inc. (AMEC), Conservation Biology Institute, Onaka Planning & Economics, and The Rick Alexander Company. 2003a. MHCP Final Plan Volume I. https://www.sandag.org/index.asp?Projectid=97&fuseaction=Projects.detail. Accessed May 2023.

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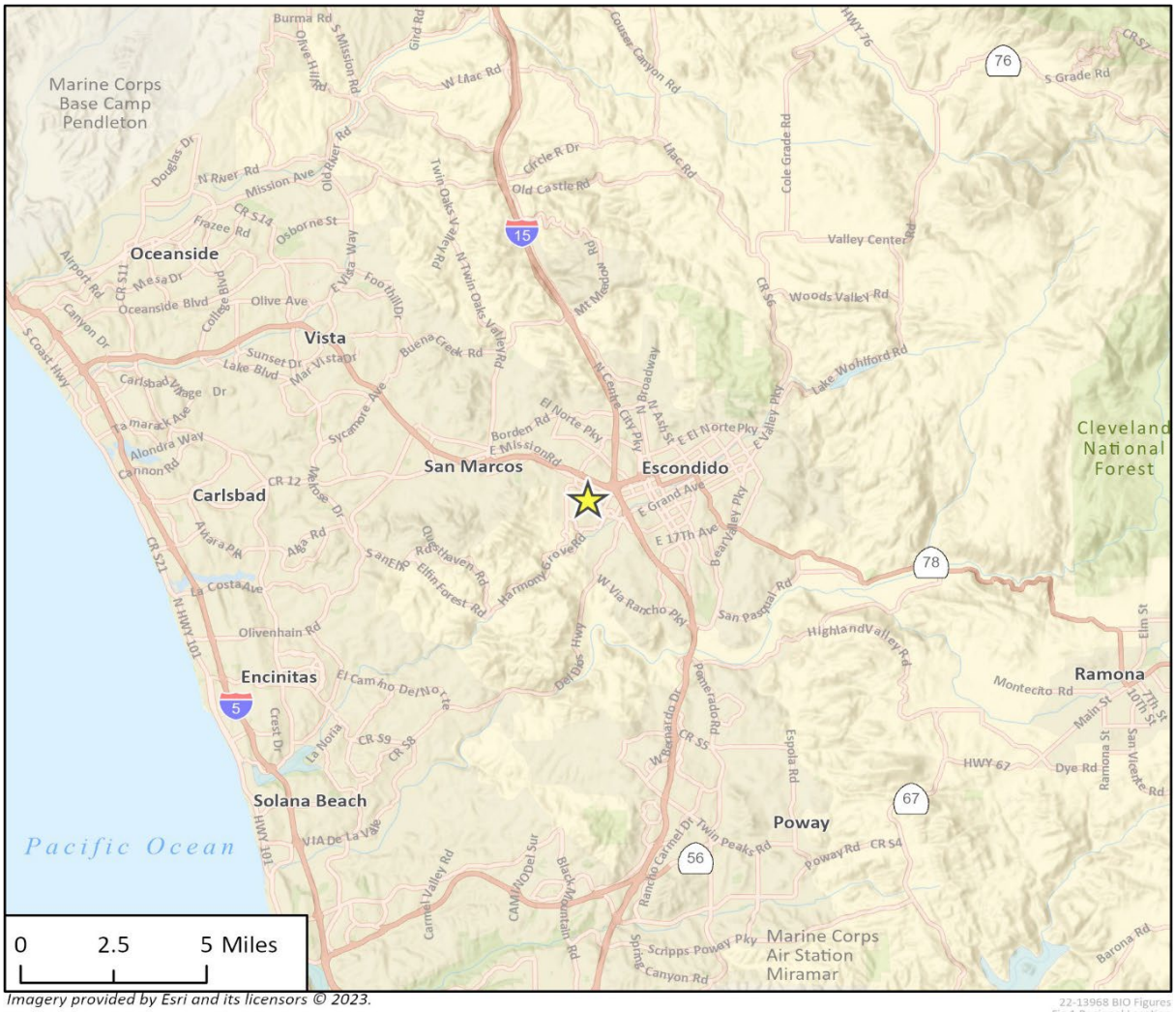
Attachment A

Project Figures

Figure 1 Regional Location



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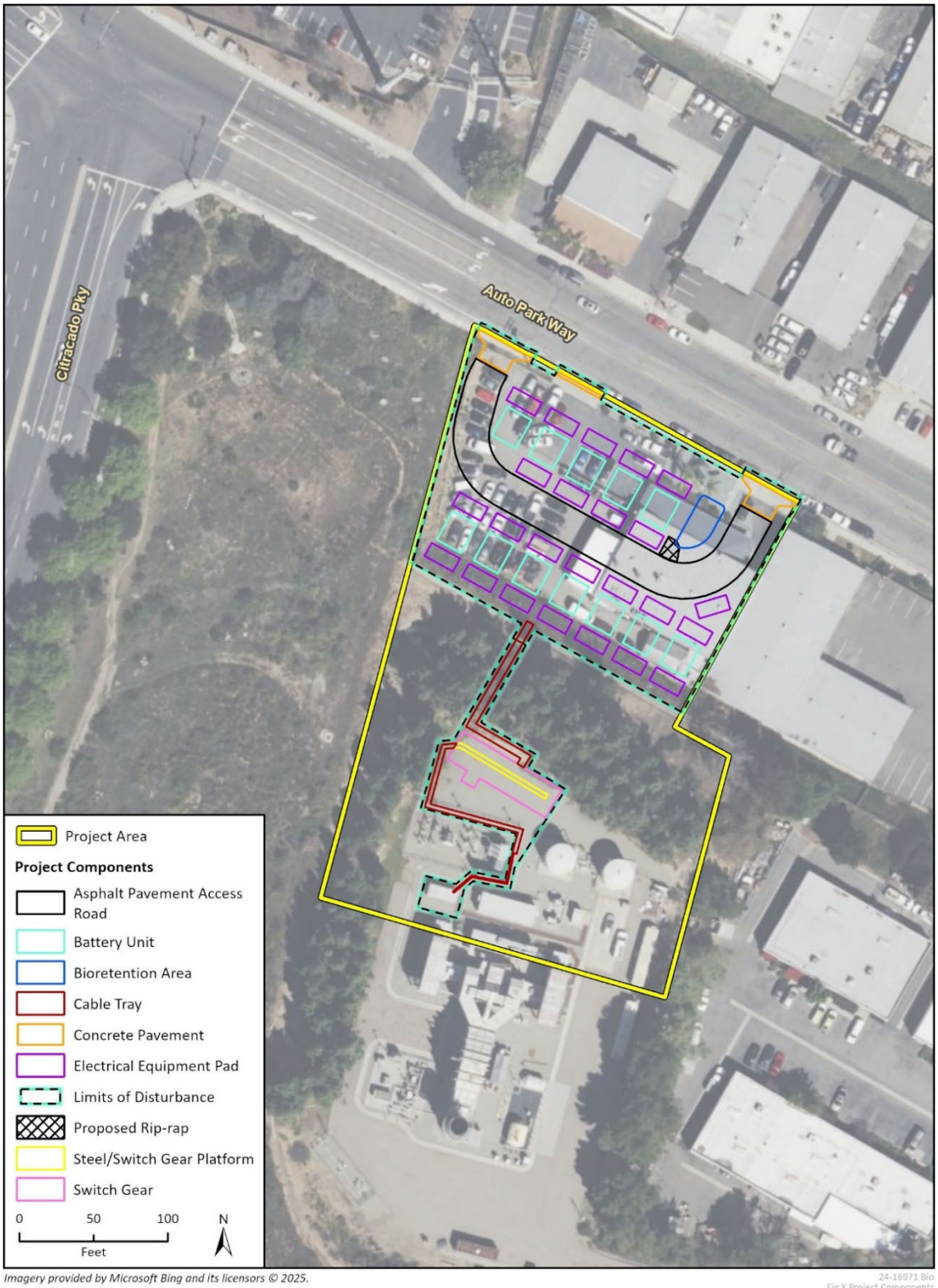
22-13968 BIO Figures
Fig 1 Regional Location

Figure 2 Project Components



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24-16971 Bio
Fig X Project Components

Figure 3 Project and Survey Areas

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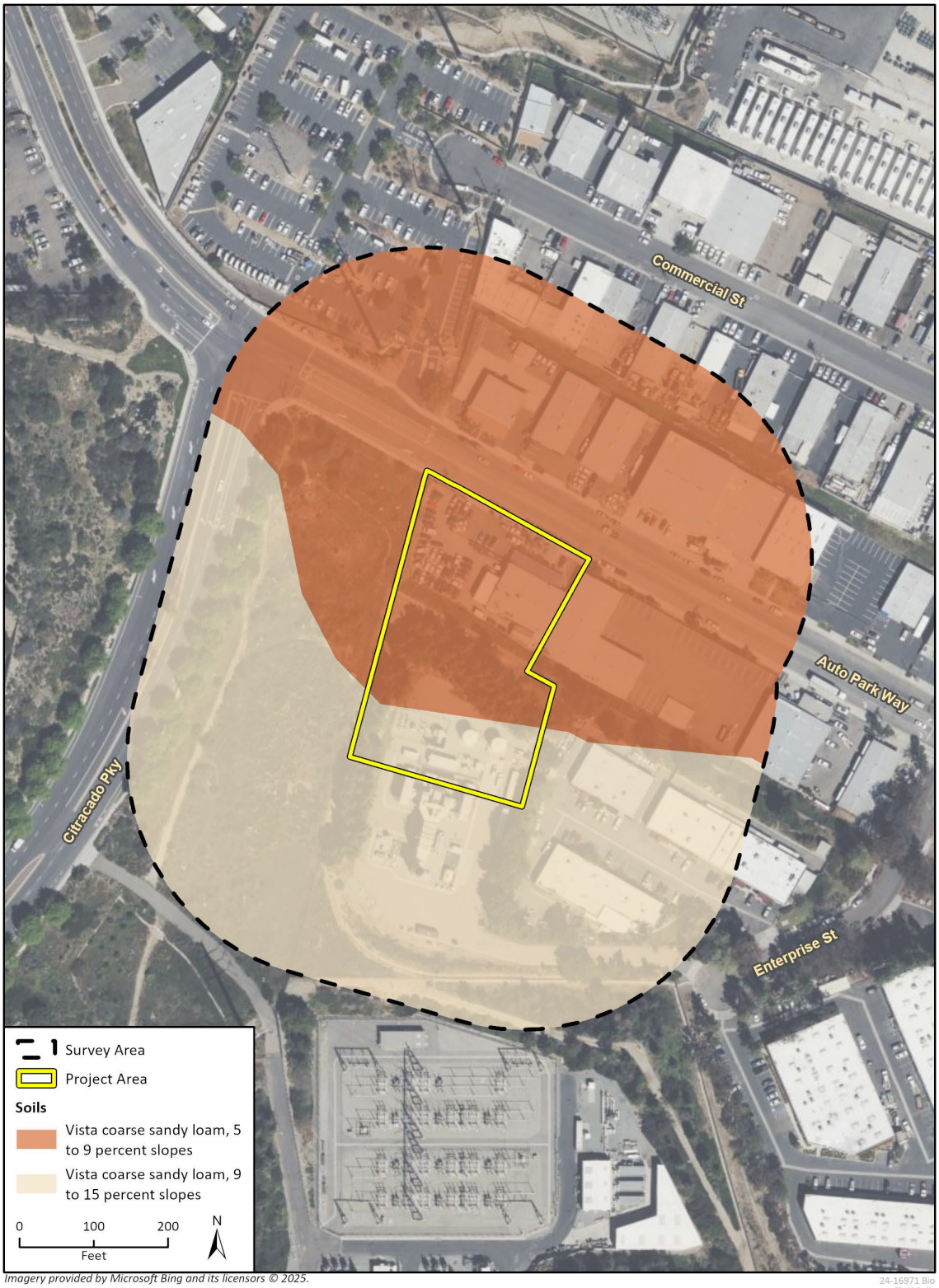
24-16971 Bio
Fig X Survey Area

Figure 4 Soils



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Additional data provided by Natural Resource Conservation Service Soil Survey Geographic, 2023.

Figure 5 Vegetation Communities and Land Cover

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Attachment B

Regulatory Setting

Regulatory Setting

The following is a brief summary of the regulatory context under which biological resources are managed at the federal, state, and local levels. A number of federal and state statutes provide a regulatory structure that guides the protection of biological resources. Agencies with the responsibility for protection of biological resources within the project site include the following:

- U.S. Army Corps of Engineers (wetlands and other waters of the United States)
- U.S. Fish and Wildlife Service (federally listed species and migratory birds)
- National Marine Fisheries Service (marine wildlife and anadromous fishes)
- Regional Water Quality Control Board (waters of the State)
- California Department Fish and Wildlife (riparian areas, streambeds, and lakes; state-listed species; nesting birds, marine resources)
- California Coastal Commission
- City of Escondido, California

United States Army Corps of Engineers

The United States Army Corps of Engineers (USACE) is responsible for administering several federal programs related to ensuring the quality and navigability of the nation's waters.

Clean Water Act Section 404

Congress enacted the Clean Water Act (CWA) "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 of the CWA authorizes the Secretary of the Army, acting through the USACE, to issue permits regulating the discharge of dredged or fill materials into the "navigable waters at specified disposal sites."

Section 502 of the CWA further defines "navigable waters" as "waters of the United States, including the territorial seas." "Waters of the United States" are broadly defined at 33 CFR Part 328.3 to include navigable waters, perennial and intermittent streams, lakes, rivers, ponds, as well as wetlands, marshes, and wet meadows. In recent years, the USACE and US Environmental Protection Agency (USEPA) have undertaken several efforts to modernize their regulations defining "waters of the United States" (e.g., the 2015 Clean Water Rule and 2020 Navigable Waters Protection Rule), but these efforts have been frustrated by legal challenges which have invalidated the updated regulations. Thus, the agencies' longstanding definition of "waters of the United States," which dates from 1986, remains in effect albeit with supplemental guidance interpreting applicable court decisions as described below.

Waters of the U.S.

In summary, USACE and USEPA regulations define "waters of the United States" as follows:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:

   i. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
   ii. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
   iii. Which are used or could be used for industrial purpose by industries in interstate commerce;

4. All impoundments of waters otherwise defined as waters of the United States;
5. Tributaries of waters identified in paragraphs (a)(1)-(4) of this section;
6. The territorial sea; or
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in items 1-6 above.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with the USEPA.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA are not waters of the United States.

The lateral limits of USACE jurisdiction in non-tidal waters is defined by the "ordinary high-water mark" (OHWM) unless adjacent wetlands are present. The OHWM is a line on the shore or edge of a channel established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed upon the bank, shelving, changes in the character of soil, destruction of vegetation, or the presence of debris (33 CFR 328.3(e)). As such, waters are recognized in the field by the presence of a defined watercourse with appropriate physical and topographic features. If wetlands occur within, or adjacent to, waters of the United States, the lateral limits of USACE jurisdiction extend beyond the OHWM to the outer edge of the wetlands (33 CFR 328.4 (c)). The upstream limit of jurisdiction in the absence of adjacent wetlands is the point beyond which the OHWM is no longer perceptible (33 CFR 328.4; see also 51 FR 41217).

Wetlands

The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). The USACE's delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology. The following is a discussion of each of these parameters.

HYDROPHYTIC VEGETATION

Hydrophytic vegetation dominates areas where frequency and duration of inundation or soil saturation exerts a controlling influence on the plant species present. Plant species are assigned wetland indicator status according to the probability of their occurring in wetlands. More than fifty percent of the dominant plant species must have a wetland indicator status to meet the hydrophytic vegetation criterion. The USACE published the National Wetland Plant List (USACE 2018), which separates vascular plants into the following four basic categories based on plant species frequency of occurrence in wetlands:

- **Obligate Wetland (OBL).** Almost always occur in wetlands
- **Facultative Wetland (FACW).** Usually occur in wetlands, but occasionally found in non-wetlands
- **Facultative (FAC).** Occur in wetlands or non-wetlands
- **Facultative Upland (FACU).** Usually occur in non-wetlands, but may occur in wetlands
- **Obligate Upland (UPL).** Almost never occur in wetlands

The USACE considers OBL, FACW and FAC species to be indicators of wetlands. An area is considered to have hydrophytic vegetation when greater than 50 percent of the dominant species in each vegetative stratum (tree, shrub, and herb) fall within these categories. Any species not appearing on the United States Fish and Wildlife Service's list is assumed to be an upland species, almost never occurring in wetlands. In addition, an area needs to contain at least 5% vegetative cover to be considered as a vegetated wetland.

HYDRIC SOILS

Hydric soils are saturated or inundated for a sufficient duration during the growing season to develop anaerobic or reducing conditions that favor the growth and regeneration of hydrophytic vegetation. Field indicators of wetland soils include observations of ponding, inundation, saturation, dark (low chroma) soil colors, bright mottles (concentrations of oxidized minerals such as iron), gleying (indicates reducing conditions by a blue-grey color), or accumulation of organic material. Additional supporting information includes documentation of soil as hydric or reference to wet conditions in the local soils survey, both of which must be verified in the field.

WETLAND HYDROLOGY

Wetland hydrology is inundation or soil saturation with a frequency and duration long enough to cause the development of hydric soils and plant communities dominated by hydrophytic vegetation. If direct observation of wetland hydrology is not possible (as in seasonal wetlands), or records of wetland hydrology are not available (such as stream gauges), assessment of wetland hydrology is frequently supported by field indicators, such as water marks, drift lines, sediment deposits, or drainage patterns in wetlands.

Applicable Case Law and Agency Guidance

The USACE's regulations defining "waters of the United States" have been subject to legal interpretation, and two influential Supreme Court decisions have narrowed the definition to exclude certain classes of waters that bear an insufficient connection to navigable waters. In *Solid Waste Agency of Northern Cook County v. Army Corps of Engineers* (2001), the United States Supreme Court stated that the USACE's CWA jurisdiction does not extend to ponds that "are not adjacent to open water." In reaching its decision, the Court concluded that the "Migratory Bird Rule," which served as the basis for the USACE's asserted jurisdiction, was not supported by the CWA. The Migratory Bird Rule extended CWA jurisdiction to intrastate waters "which are or would be used as habitat by birds protected by Migratory Bird Treaties or which are or would be used as habitat by other migratory birds which cross state lines…" The Court was concerned that application of the Migratory Bird Rule resulted in "reading the term 'navigable waters' out of the statute. Highlighting the language of the CWA to determine the statute's jurisdictional reach, the Court stated, "the term 'navigable' has at least the import of showing us what Congress had in mind as its authority for enacting the CWA: its traditional jurisdiction over waters that were or had been navigable in fact or which could reasonably be so made." This decision stands for the proposition that non-navigable isolated, intrastate waters are not waters of the United States and thus are not jurisdictional under the CWA.

In 2006 the United States Supreme Court decided *Rapanos v. United States* and *Carabell v. United States* (collectively "Rapanos"), which were consolidated cases determining the extent of CWA jurisdiction over waters that carry only an infrequent surface flow. The court issued no majority opinion in Rapanos. Instead, the justices authored five separate opinions including the "plurality" opinion, authored by Justice Scalia (joined by three other justices), and a concurring opinion by Justice Kennedy. To guide implementation of the decision, the USACE and USEPA issued a joint guidance memorandum ("Rapanos Guidance Memorandum") in 2008 stating that "regulatory jurisdiction under the CWA exists over a water body if either the plurality's or Justice Kennedy's standard is satisfied."

According to the plurality opinion in Rapanos, "the waters of the United States include only relatively permanent, standing or flowing bodies of water" and do not include "ordinarily dry channels through which water occasionally or intermittently flows." In addition, while all wetlands that meet the USACE definition are considered adjacent wetlands, only those adjacent wetlands that have a continuous surface connection because they directly abut the tributary (e.g., they are not separated by uplands, a berm, dike, or similar feature) are considered jurisdictional under the plurality standard.

Under Justice Kennedy's opinion, "the USACE's jurisdiction over wetlands depends upon the existence of a significant nexus between the wetlands in question and navigable waters in the traditional sense. Wetlands possess the requisite nexus, and thus come within the statutory phrase 'navigable waters,' if the wetlands, either alone or in combination with similarly situated lands in the region, significantly affect the chemical, physical, and biological integrity of other covered waters more readily understood as 'navigable.' When, in contrast, wetlands' effects on water quality are speculative or insubstantial, they fall outside the zone fairly encompassed by the statutory term 'navigable waters.'" Justice Kennedy identified "pollutant trapping, flood control, and runoff storage" as some of the critical functions wetlands can perform relative to other waters. He concluded that, given wetlands' ecological role, "mere adjacency" to a non-navigable tributary was insufficient to establish CWA jurisdiction, and that "a more specific inquiry, based on the significant nexus standard, is therefore necessary."

Interpreting these decisions, and according to the Rapanos Guidance Memorandum, the USACE and USEPA will assert jurisdiction over the following waters:

- Traditional navigable waters;
- Wetlands adjacent to traditional navigable waters;
- Non-navigable tributaries of traditional navigable waters that are relatively permanent where the tributaries typically flow year-round or have continuous flow at least seasonally (e.g., typically three months); and,
- Wetlands that directly abut such tributaries.

The USACE and USEPA will decide jurisdiction over the following waters based on a fact-specific analysis to determine whether they have a significant nexus with a traditional navigable water:

- Non-navigable tributaries that are not relatively permanent;
- Wetlands adjacent to non-navigable tributaries that are not relatively permanent; and,
- Wetlands adjacent to but that do not directly abut a relatively permanent non-navigable tributary.

Where a significant nexus analysis is required, the USACE and USEPA will apply the significant nexus standard as follows:

- A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by all wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical and biological integrity of downstream traditional navigable waters; and,
- Significant nexus includes consideration of hydrologic and ecologic factors.

The USACE and USEPA generally will not assert jurisdiction over the following features:

- Swales or erosional features (e.g., gullies, small washes characterized by low volume, infrequent, or short duration flow); and,
- Ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water.

Rivers and Harbors Act Section 10

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the USACE for the construction of any structure in or over any navigable water of the United States. Structures or work outside the limits defined for navigable waters of the United States require a Section 10 permit if the structure or work affects the course, location, or condition of the water body. The law applies to any dredging or disposal of dredged materials, excavation, filling, re-channelization, or any other modification of a navigable water of the United States, and applies to all structures and work. It further includes, without limitation, any wharf, dolphin, weir, boom breakwater, jetty, groin, bank protection (e.g., riprap, revetment, bulkhead), mooring structures such as pilings, aerial or subaqueous power transmission lines, intake or outfall pipes, permanently moored floating vessel, tunnel, artificial canal, boat ramp, aids to navigation, and any other permanent, or semi-permanent obstacle or obstruction. It is important to note that Section 10 applies only to navigable waters, and thus does not apply to work in non-navigable wetlands or tributaries. In some cases, Section 10 authorization is issued by the USACE concurrently with CWA Section 404 authorization, such as when certain Nationwide Permits are used.

Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over “waters of the State,” which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state (California Water Code sec. 13050(e)). These agencies also have responsibilities for administering portions of the CWA.

Clean Water Act Section 401

Section 401 of the CWA requires an applicant requesting a federal license or permit for an activity that may result in any discharge into navigable waters (such as a Section 404 Permit) to provide state certification that the proposed activity will not violate state and federal water quality standards. In California, CWA Section 401 Water Quality Certification (Section 401 Certification) is issued by the RWQCBs and by the SWRCB for multi-region projects. The process begins when an applicant submits an application to the RWQCB and informs the USACE (or the applicable agency from which a license or permit was requested) that an application has been submitted. The USACE will then determine a “reasonable period of time” for the RWQCB to act on the application; this is typically 60 days for routine projects and longer for complex projects but may not exceed one year. When the period has elapsed, if the RWQCB has not either issued or denied the application for Section 401 Certification, the USACE may determine that Certification has been waived and issue the requested permit. If a Section 401

Certification is issued it may include binding conditions, imposed either through the Certification itself or through the requested federal license or permit.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- The quality of all the waters of the State shall be protected
- All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason
- The State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation

The Porter-Cologne Act established nine RWQCBs (based on watershed boundaries) and the SWRCB, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous nonpoint source related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

Section 13260 of the Porter-Cologne Act requires any person discharging or proposing to discharge waste that could affect the quality of waters of the State to file a Report of Waste Discharge with the appropriate RWQCB. The RWQCB may then authorize the discharge, subject to conditions, by issuing Waste Discharge Requirements (WDRs). While this requirement was historically applied primarily to outfalls and similar point source discharges, the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*, effective May 2020, make it clear that the agency will apply the Porter-Cologne Act's requirements to discharges of dredge and fill material as well. The *Procedures* state that they are to be used in issuing CWA Section 401 Certifications and WDRs, and largely mirror the existing review requirements for CWA Section 404 Permits and Section 401 Certifications, incorporating most elements of the USEPA's *Section 404(b)(1) Guidelines*. Following issuance of the *Procedures*, the SWRCB produced a consolidated application form for dredge/fill discharges that can be used to obtain a CWA Section 401 Water Quality Certification, WDRs, or both.

Non-Wetland Waters of the State

The SWRCB and RWQCBs have not established regulations for field determinations of waters of the state except for wetlands currently. In many cases the RWQCBs interpret the limits of waters of the State to be bounded by the OHWM unless isolated conditions or ephemeral waters are present. However, in the absence of statewide guidance each RWQCB may interpret jurisdictional boundaries within their region and the SWRCB has encouraged applicants to confirm jurisdictional limits with their RWQCB before submitting applications. As determined by the RWQCB, waters of the State may include riparian areas or other locations outside the OHWM, leading to a larger jurisdictional area over a given water body compared to the USACE.

Wetland Waters of the State

Procedures for defining wetland waters of the State pursuant to the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* went into effect May 28, 2020. The SWRCB defines an area as wetland if, under normal circumstances:

(i) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;

(ii) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and

(iii) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

The SWRCB's Implementation Guidance for the Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State (2020), states that waters of the U.S. and waters of the State should be delineated using the standard USACE delineation procedures, taking into consideration that the methods shall be modified only to allow for the fact that a lack of vegetation does not preclude an area from meeting the definition of a wetland.

United States Fish and Wildlife Service

The United States Fish and Wildlife Service (USFWS) implements several laws protecting the Nation's fish and wildlife resources, including the Endangered Species Act (ESA; 16 United States Code [USC] Sections 153 et seq.), the Migratory Bird Treaty Act (MBTA; 16 USC Sections 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668).

Endangered Species Act

The USFWS and National Marine Fisheries Service (NMFS) share responsibility for implementing the ESA. Generally, the USFWS implements the FESA for terrestrial and freshwater species, while the NMFS implements the FESA for marine and anadromous species. Projects that would result in "take" of any threatened or endangered wildlife species, or a threatened or endangered plant species if occurring on federal land, are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of the ESA, depending on the involvement by the federal government in funding, authorizing, or carrying out the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of the ESA; however, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

Migratory Bird Treaty Act

The MBTA of 1918 implements four international conservation treaties that the U.S. entered into with Canada in 1916, Mexico in 1936, Japan in 1972, and Russia in 1976. It is intended to ensure the sustainability of populations of all protected migratory bird species. The law has been amended with the signing of each treaty, as well as when any of the treaties were amended, such as with Mexico in 1976 and Canada in 1995. The MBTA prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the USFWS.

The list of migratory bird species protected by the law, in regulations at 50 CFR Part 10.13, is primarily based on bird families and species included in the four international treaties. A migratory bird species is included on the list if it meets one or more of the following criteria:

1. It occurs in the United States or U.S. territories as the result of natural biological or ecological processes and is currently, or was previously listed as, a species or part of a family protected by one of the four international treaties or their amendments.
2. Revised taxonomy results in it being newly split from a species that was previously on the list, and the new species occurs in the United States or U.S. territories as the result of natural biological or ecological processes.
3. New evidence exists for its natural occurrence in the United States or U.S. territories resulting from natural distributional changes and the species occurs in a protected family.

In 2004, the Migratory Bird Treaty Reform Act limited the scope of the MBTA by stating the MBTA applies only to migratory bird species that are native to the United States or U.S. territories, and that a native migratory bird species is one that is present as a result of natural biological or ecological processes. The MBTRA requires the USFWS to publish a list of all nonnative, human-introduced bird species to which the MBTA does not apply, and an updated list was published in 2020. The 2020 update identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the United States or U.S. territories is solely the result of intentional or unintentional human-assisted introductions.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act prohibits anyone, without a permit issued by the USFWS, from "taking" bald or golden eagles, including their parts (including feathers), nests, or eggs. The Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle … [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

"Disturb" means "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment.

California Department of Fish and Wildlife

The California Department of Fish and Wildlife (CDFW) derives its authority from the Fish and Game Code of California and administers several State laws protecting fish and wildlife resources and the habitats upon which they depend.

California Endangered Species Act

The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 et. seq.) prohibits take of state listed threatened or endangered. Take under CESA is defined as "Hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (Fish and Game Code sec. 86). This definition does not prohibit indirect harm by way of habitat modification, except where such harm is the proximate cause of death of a listed species. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated. Unlike the federal ESA, CESA's protections extend to candidate species during the period (typically one year) while the California Fish and Game Commission decides whether the species warrants CESA listing.

Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare, and prohibits the take of listed plant species. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA's permitting procedures would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

Fully Protected Species Laws

The CDFW enforces Sections 3511, 4700, 5050, and 5515 of the Fish and Game Code, which prohibit take of species designated as Fully Protected. The CDFW is not allowed to issue an Incidental Take Permit for Fully Protected species; therefore, impacts to these species must be avoided. The exception is situations where a Natural Community Conservation Plan (NCCP) is in place that authorizes take of the fully protected species.

Avian Protection Laws

California Fish and Game Code sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level offense to take any bird in violation of the federal Migratory Bird Treaty Act.

Protection of Lakes and Streambeds

California Fish and Game Code section 1602 states that it is unlawful for any person to "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake" without first notifying the California Department of Fish and Wildlife (CDFW) of that activity. Thereafter, if CDFW determines and informs the entity that the activity will not substantially adversely affect any existing fish or wildlife resources, the entity may commence the activity. If, however, CDFG determines that the activity may substantially adversely affect an existing fish or wildlife resource, the entity may be required to obtain from CDFW a Streambed Alteration Agreement (SAA), which will include reasonable measures necessary to protect the affected resource(s), before the entity may conduct the activity described in the notification. Upon receiving a complete Notification of Lake/Streambed Alteration, CDFW has 60 days to present the entity with a Draft SAA. Upon review of the Draft SAA by the applicant, any problematic terms are negotiated with CDFW and a final SAA is executed.

The CDFW has not defined the term "stream" for the purposes of implementing its regulatory program under Section 1602, and the agency has not promulgated regulations directing how jurisdictional streambeds may be identified, or how their limits should be delineated. However, four relevant sources of information offer insight as to the appropriate limits of CDFW jurisdiction as discussed below.

- **The plain language of Section 1602 of CFGC** establishes the following general concepts:
  - References "river," "stream," and "lake"
  - References "natural flow"
  - References "bed," "bank," and "channel"
- **Applicable court decisions**, in particular *Rutherford v. State of California* (188 Cal App. 3d 1276 (1987), which interpreted Section 1602's use of "stream" to be as defined in common law. The Court indicated that a "stream" is commonly understood to:
  - Have a source and a terminus
  - Have banks and a channel
  - Convey flow at least periodically, but need not flow continuously and may at times appear outwardly dry
  - Represent the depression between the banks worn by the regular and usual flow of the water
  - Include the area between the opposing banks measured from the foot of the banks from the top of the water at its ordinary stage, including intervening sand bars
  - Include the land that is covered by the water in its ordinary low stage
  - Include lands below the OHWM
- **CDFW regulations** defining "stream" for other purposes, including sport fishing (14 CCR 1.72) and streambed alterations associated with cannabis production (14 CCR 722(c)(21)), which indicate that a stream:
  - Flows at least periodically or intermittently
  - Flows through a bed or channel having banks
  - Supports fish or aquatic life
  - Can be dry for a period of time
  - Includes watercourses where surface or subsurface flow supports or has supported riparian vegetation
- **Guidance documents**, including A Field Guide to Lake and Streambed Alteration Agreements (CDFG 1994) and Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-Scale Solar Power Plants (Brady and Vyverberg 2013), which suggest the following:
  - A stream may flow perennially or episodically
  - A stream is defined by the course in which water currently flows, or has flowed during the historic hydrologic course regime (approximately the last 200 years)
  - Width of a stream course can reasonably be identified by physical or biological indicators
  - A stream may have one or more channels (single thread vs. compound form)
  - Features such as braided channels, low-flow channels, active channels, banks associated with secondary channels, floodplains, islands, and stream-associated vegetation, are interconnected parts of the watercourse

- Canals, aqueducts, irrigation ditches, and other means of water conveyance can be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife
- Biologic components of a stream may include aquatic and riparian vegetation, all aquatic wildlife including fish, amphibians, reptiles, invertebrates, and terrestrial species which derive benefits from the stream system
- The lateral extent of a stream can be measured in different ways depending on the particular situation and the type of fish or wildlife resource at risk

The tenets listed above, among others, are applied to establish the boundaries of streambeds in various environments. Importance of each factor may be weighted based on site-specific considerations and the applicability of the indicators to the streambed at hand.

Local Jurisdiction

City of Escondido, California

City of Escondido General Plan

The Biological and Open Space Element in the 2012 City of Escondido General Plan contains several policies pertaining to the protection of biological resources (City of Escondido, 2012).

- **Goal 1**: Preservation and enhancement of Escondido's open spaces and significant biological resources as components of a sustainable community
  - **Policy 1.6**: Preserve and protect significant wetlands, riparian, and woodland habitats as well as rare, threatened or endangered plants and animals and their habitats through avoidance. If avoidance is not possible, mitigation of resources either on- or off-site at ratios consistent with State and federal regulations, and in coordination with those agencies having jurisdiction over such resources.
  - **Policy 1.7**: Require that a qualified professional conduct a survey for proposed development projects located in areas potentially containing significant biological resources to determine their presence and significance. This shall address any flora or fauna of rare and/or endangered status, declining species, species and habitat types of unique or limited distribution, and/or visually prominent vegetation.
  - **Policy 1.8**: Require that proposed development projects implement appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks. In the event that significant biological resources are adversely affected, consult with appropriate state and federal agencies to determine adequate mitigation or replacement of the resource.
  - **Policy 1.9**: Encourage proposed development projects to minimize the removal of significant stands of trees unless needed to protect public safety and to limit tree removal to the minimum amount necessary to assure continuity and functionality of building spaces.

City of Escondido Grading Ordinance

The purpose of Section 33-1068(a) of the City's Grading Ordinance (i.e., the Clearing of Land and Vegetation Protection Section) is to safeguard life, limb, property, and the public welfare by regulating grading, clearing, and removal of mature trees on private property. Further, its purpose is to reflect and achieve the goals and policies of the Escondido General Plan, which recognizes oak trees (*Quercus*

spp.) and other mature trees as significantly aesthetic and ecological resources (City of Escondido 2001).

Section 33-1069(a) (i.e., the Vegetation Protection and Replacement Standards Section) of the Grading Ordinance states the following in terms of tree protection:

- No person shall destroy or do any clearing of vegetation and mature trees, nor destroy, clear, trim, or cut protected trees, in violation of this chapter, including deliberately damaging a mature or protected tree so that the removal of the tree is necessary to maintain public safety.
- Every feasible effort shall be made to preserve sensitive biological habitat, sensitive biological species, mature trees, and protected trees in-place on the project site through consideration of alternative means of accomplishing the desired action or project, to the satisfaction of the director.
- All feasible measures to avoid damage to existing trees and vegetation to remain shall be taken by the owner or developer during clearing, grading, and construction. A report prepared by a professional and provided at the applicant's expense, which provides recommendations on methods to minimize damage to the tree(s), may be required upon determination of the director.
- Rigid protective barriers of a type acceptable to the director shall be placed around the drip line of all trees and vegetation designated to remain. The barricades or fencing are to remain in place until completion of all grading and construction.

Section 33-1069(b) states the following for tree replacement standards:

- Required landscaping which is removed shall be replaced with equivalent plant material consistent with the original requirement(s).
- If mature trees cannot be preserved on-site, they shall be replaced at a minimum 1:1 ratio. The preferred replacement is a tree(s) of equal size and caliper. Protected trees shall be replaced at a minimum 2:1 ratio.
- The number, size, and species of replacement trees shall be determined on a case-by-case basis by the director, based on the specific circumstances of each request, the characteristics and condition (size, age, and location) of the individual trees involved, and any professional report.
- The planting location of the replacement trees may be on-site or elsewhere in the City.
- Replacement trees and habitat mitigation sites shall be maintained in a flourishing manner on a continuing basis.

DEFINITIONS

Mature tree: is any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree, shall have a diameter 4 inches or greater when measured at 4.5 feet above the tree's natural grade (i.e., diameter at breast height [DBH]). All other mature trees shall have a diameter of 8 inches DBH, or greater, for a single stem or one of the multiple stems.

Protected Tree: is any oak which has a 10 inch or greater DBH, or any other species or individual specimen listed on the local historic register or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code.

Attachment C

Representative Site Photographs

Photograph 1. View of EEPP entrance gate, access road, and surrounding tree and manicured shrub vegetation, facing east

Photograph 2. View of EEPP access road, mature coast live oak tree, and southern portion of Survey Area, facing southwest

Photograph 3. View southern slope with disturbed slope, concrete culvert, and fence line, facing west

Photograph 4. View of Disturbed Diegan Coastal Sage Scrub habitat along the top of slope in the southwestern corner of the Survey Area, facing southwest

Photograph 5. View of second patch of Disturbed Diegan Coastal Sage Scrub with non-native grassland, fence line, and open space beyond, facing west

Photograph 6. View of western portion of Project Area, disturbed slope, existing EEPP facility, and ornamental coniferous trees to the west and north

Photograph 7. View of northern portion of EEPP facility, graded and graveled lot with ornamental coniferous trees, facing northeast in area of proposed BESS cable tray and elevated switchgear platform

Photograph 8. View of eastern portion of Project Area, ornamental trees, and western sycamores outside of fence line

Photograph 9. View of disturbed slope in the southern portion of the Survey Area, facing west

Photograph 10. View of southern boundary of Survey Area, Disturbed Diegan Coastal Sage Scrub, and existing SDG&E Palomar Energy Center Substation, facing east

Photograph 11. View of open space habitat within the Survey Buffer to the west of the Project Area, showing developed access road, non-native grassland, disturbed areas, ornamental trees, and Diegan Coastal Sage Scrub

Photograph 12. Closer view of open space habitat consisting of non-native grassland, Diegan Coastal Sage Scrub, and ornamental trees located within the western portion of the Survey Area, facing north

Photograph 13. View of the auto body shop and associated ornamental trees and shrubs. The proposed location of the cable tray installation, the norther slope, is visible in the background, facing south

Photograph 14. View of the auto body shop and associated ornamental trees and shrubs, facing east

Photograph 15. View of the auto body shop from the proposed location of the cable tray installation on the norther slope, facing northeast

Photograph 16. View of the proposed cable tray installation location on norther slope from the auto body shop, facing Southeast

Attachment D

Arborist Report (March 2025)

Enterprise Battery Energy Storage System Project

Arborist Report

prepared for

Enterprise BESS LLC
4350 Executive Drive, Suite 320
San Diego, California 92121

prepared by

Rincon Consultants, Inc.
8825 Aero Drive, Suite 120
San Diego, California 92123

Revised March 2025

RINCON CONSULTANTS, INC. SINCE 1994

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1 Project Overview

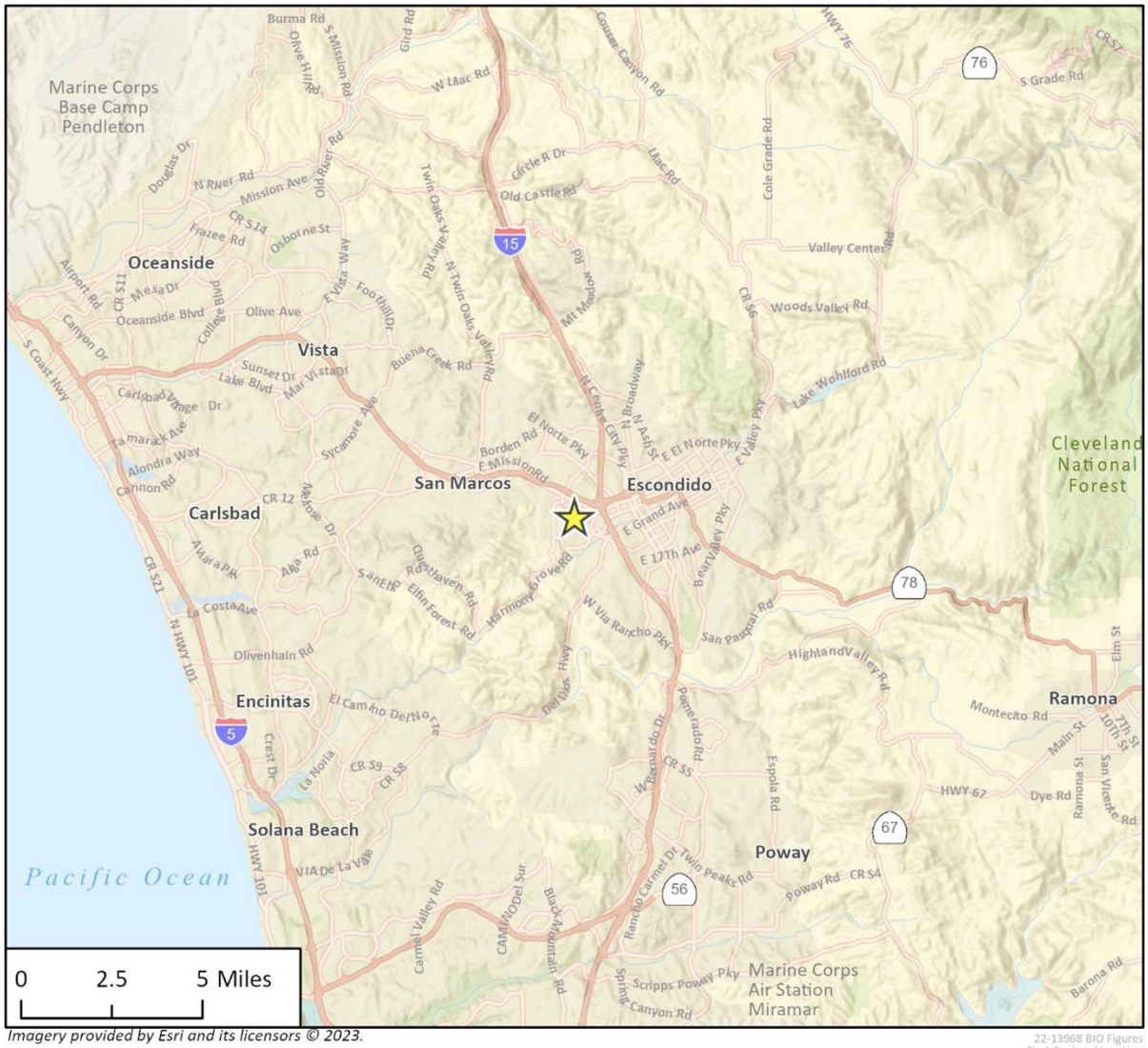
This report summarizes the methods and results of a tree survey conducted by Rincon Consultants, Inc. (Rincon) for the Enterprise Battery Energy Storage System (BESS) Project (Project) in Escondido, California. The survey included all mature and protected trees (as defined by the City of Escondido's (City) Municipal Regulations Grading Ordinance [Grading Ordinance]) with trunks or driplines located within the approximately 1.98-acre Project Area. In addition, this report provides an impact analysis for the surveyed trees on the Project site, recommended tree protection measures for the trees that would be preserved, and tree replacement requirements for the trees that must be removed.

The layout of the proposed Project was modified following submittal of the March 2024 Petition; this report addresses the Project as currently proposed versus the layout proposed in 2024. Please note that this Arborist Report supersedes the original reported submitted March 2024. Impacts addressed in previous reports are not applicable to this project.

1.1 Project Location

The currently proposed Project is located in Escondido, California (Figure 1). The Project includes interconnection-related facilities that are co-located with the existing CalPeak Power Enterprise Emergency Peaker Project (EEPP) within Assessor Parcel Number (APN) 232-410-45-00 at 201 Enterprise Street. The Project also includes 52-megawatt (MW) of BESS facilities to be installed on an approximately 0.82-acre site, located at 2361 Auto Park Way on APNs 232-410-21-00, 232-410-20-00, and 232-410-19-00. The 0.82-acre BESS site was most recently used as the Auto Art Paint & Body business until January 2025. The Project Area is defined as the combined 1.98-acre Project Area encompassing all four APNs as defined in Figure 2. The Project Area is bound by industrial/commercial land uses to the north, northwest, east, and south. The area between Citracado Parkway to the west and the EEPP and Auto Park Way parcels to the east is undeveloped land with the exception of transmission infrastructure. Other land uses in the area include the Palomar Medical Center directly across Citracado Parkway, single-family residential approximately 1,100 feet to the northwest, 1,700 feet to the southwest, as measured from the Project Area boundary, and north and northeast across State Route 78 and east of the Interstate 15.

Figure 1 Regional Location



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22-13968 BIO Figures
Fig 1 Regional Location

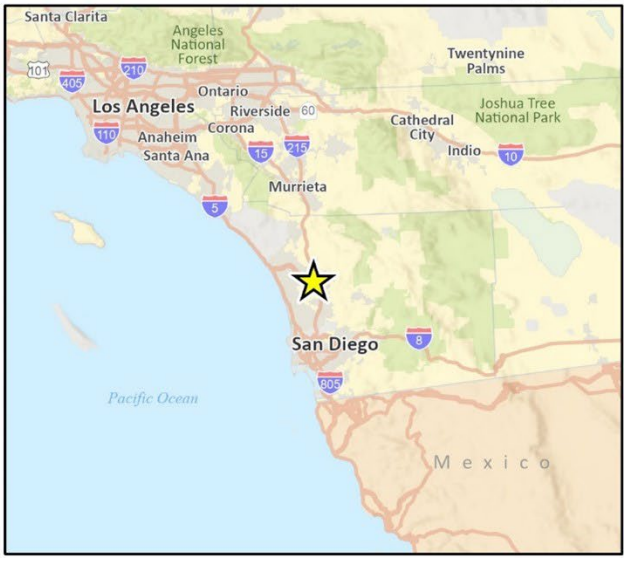

Figure 2 Project Location

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24-16971 Bio
Fig 2 Study Area

1.2 Project Description

The proposed BESS Project would support California's current need for additional electrical supply capacity during high peak-load demand periods. The proposed BESS Project would use approximately 0.1 acre of available open areas within the northern portion of the overall 2.94-acre EEPP parcel, plus approximately 0.82 acre of additional land on three parcels to the north on the south side of Auto Park Way. The Project would involve installation of containerized battery systems with internal heating, ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. The Project includes an approximately 350-foot-long, 13.8-kilovolt (kV) gen-tie line supported on aboveground cable tray to connect the BESS to the existing EEPP switchyard generation step-up (GSU) transformer. Installation of the cable tray may require the removal of up to five of the existing, mature Canary pine trees (*Pinus canariensis*) on the southern EEPP perimeter that were planted as part of the required landscaping plan when the EEPP was licensed in 2001. The elevated cable tray would be supported on pile foundations and/or concrete pads. Access to the EEPP is via the existing peaker plant entrance on Enterprise Street and the access to the northern BESS parcels is via the adjacent Auto Park Way.

Enterprise BESS Project-related improvements on the northern portion of the EEPP parcel include installation of: (1) gen-tie on elevated cable tray; (2) elevated switchgear platform; and (3) electrical and communication line connections in the EEPP switchgear area, including the low side of the GSU. Minor excavations associated with equipment foundations would be required.

Development of the northern BESS parcels would require: (1) demolition of the existing auto body shop facilities; (2) grading, site preparation, and foundation installation for BESS facilities; (3) installation of an up to 18-foot-tall retaining wall near the southern border of the northern parcels area to stabilize the vertical cut near the property line that is associated with removal of the existing hillside to create an expanded level pad area for the Project. The Project development plan includes the installation of sheet piles along the southern border of the northern parcels to stabilize the cut slope prior to installation of the retaining wall.

The Enterprise BESS would be connected to the electrical grid via the existing GSU at the EEPP, which has an existing 69-kV connection to the SDG&E Escondido Substation to the north. The BESS Project would not require any high voltage modifications at the EEPP switchyard or the existing off-site 69-kV line. Operation of the BESS facility would be integrated with the existing EEPP, but the BESS will be charged from the electrical grid and not the EEPP. The BESS and the EEPP may be operated simultaneously in accordance with the market-optimized dispatch instructions received from the California Independent System Operator's Automated Dispatching System, but the combined output would be control-limited to never exceed the limit of the Generator Interconnection Agreement.

The Enterprise BESS Project will require discretionary permitting involving approval of a Supplemental Petition for Post-Certification Amendment from the CEC. It is understood that discretionary permitting with the City and/or County would not be required.

The Project's operational life and associated land leases are anticipated to be up to 40 years. As a part of the original licensing of the EEPP Project, a biological technical analysis and site surveys were conducted (Helix Environmental Planning, Inc. 2001) covering the entire parcel inclusive of the proposed BESS Project. The 2001 report established biological Conditions of Certification (CoC) for

the EEPP. This arborist report supplements the Biological Resources Technical Report for the Project which documents existing biological conditions at the Project and evaluates the potential for the Project to impact sensitive biological resources. Where impacts are identified, this report also recommends CoCs or other measures that may be required to address biological impacts.

1.3 Regulatory Background

The purpose of Section 33-1068.A of the City's Grading Ordinance (i.e., the Clearing of Land and Vegetation Protection Section) is to safeguard life, limb, property, and the public welfare by regulating grading, clearing, and removal of mature trees on private property. Furthermore, its purpose is to reflect and achieve the goals and policies of the Escondido General Plan, which recognizes oak trees (*Quercus* spp.) and other mature trees as significant aesthetic and ecological resources (City of Escondido 2001).

Section 33-1069(a) (i.e., the Vegetation Protection and Replacement Standards Section) of the Grading Ordinance states the following in terms of tree protection:

- No person shall destroy or do any clearing of vegetation and mature trees, nor destroy, clear, trim, or cut protected trees, in violation of this chapter, including deliberately damaging a mature or protected tree so that the removal of the tree is necessary to maintain public safety.
- Every feasible effort shall be made to preserve sensitive biological habitat, sensitive biological species, mature trees, and protected trees in-place on the project site through consideration of alternative means of accomplishing the desired action or project, to the satisfaction of the director.
- All feasible measures to avoid damage to existing trees and vegetation to remain shall be taken by the owner or developer during clearing, grading, and construction. A report prepared by a professional and provided at the applicant's expense, which provides recommendations on methods to minimize damage to the tree(s), may be required upon determination of the director.
- Rigid protective barriers of a type acceptable to the director shall be placed around the drip line of all trees and vegetation designated to remain. The barricades or fencing are to remain in place until completion of all grading and construction.

Section 33-1069b states the following for tree replacement standards:

- Required landscaping which is removed shall be replaced with equivalent plant material consistent with the original requirement(s).
- If mature trees cannot be preserved on-site, they shall be replaced at a minimum 1:1 ratio. The preferred replacement is a tree(s) of equal size and caliper. Protected trees shall be replaced at a minimum 2:1 ratio.
- The number, size, and species of replacement trees shall be determined on a case-by-case basis by the director, based on the specific circumstances of each request, the characteristics and condition (size, age, and location) of the individual trees involved, and any professional report.
- The planting location of the replacement trees may be on-site or elsewhere in the City.
- Replacement trees and habitat mitigation sites shall be maintained in a flourishing manner on a continuing basis.

Definitions

Mature tree: is any self-supporting woody perennial plant, native or ornamental, with a single well-defined stem or multiple stems supporting a crown of branches. The single stem, or one of the multiple stems of any mature oak tree, shall have a diameter 4 inches or greater when measured at 4.5 feet above the tree's natural grade (i.e., diameter at breast height [DBH]). All other mature trees shall have a diameter of 8 inches DBH, or greater, for a single stem or one of the multiple stems.

Protected Tree: is any oak which has a 10 inch or greater DBH, or any other species or individual specimen listed on the Local Register of Historical Resources or determined to substantially contribute to the historic character of a property or structure listed on the local historic register, pursuant to Article 40 of the Escondido Zoning Code.

2 Methodology

All mature and protected trees within the Project Area were surveyed by Rincon International Society of Arboriculture (ISA) Board Certified Master Arborist Nate Faris (IN-3274B) and ISA Certified Arborist Casey Clark (#WE-12031A) on June 6, 7, and October 16, 2023. An additional survey was conducted on October 12, 2024, by Rincon biologist Molly Morrissey, under the guidance of Mr. Clark (Table 1).

Table 1 Survey Personnel and Conditions

Date	Time (24-hour)	Surveyors	Air Temperature (degrees Fahrenheit)	Wind Speed (miles per hour)	Weather Notes
June 6, 2023	0700 to 1700	Nate Faris	60–85	0–10	Overcast
June 7, 2023	0700 to 1200	Nate Faris	60–85	0–10	Overcast
October 16, 2023	0800 to 1200	Casey Clark	60–70	0–5	Sunny
October 12, 2024	0745 to 0930	Molly Morrissey	58–62	0–5	Sunny

All mature and protected trees that had any portion of their trunk or dripline within the Project Area were surveyed. A tree tag with a unique tree identification number was assigned to each tree surveyed, which was sequential to the survey path, and its location was documented using a Geographic Positioning System (GPS) device capable of submeter accuracy. The three queen palms (*Syagrus romanzoffiana*) surveyed on October 12, 2024, were not tagged due to privacy concerns from the property owner at that time. The species, number of trunks, DBH, height, canopy spread in eight cardinal directions, general health condition, and any relevant notes (e.g., structural defects, heath issues, if the tree was surveyed from beyond a fence line) were recorded for each tree. DBH measurements were taken with a Forester's diameter tape, and an aggregate DBH was calculated for trees with multiple trunks using the following formula: $Aggregate\ DBH = \sqrt{(DBH1^2)+(DBH2^2)+(DBH3^2)}$. Tree height and canopy spread were visually estimated in the field with the assistance of a hypsometer. The health condition of each tree was evaluated by visual inspection, and the arborist assigned one of the following general condition ratings to each tree:

- **Good:** Overall good tree vigor, healthy foliage and cambium with no significant defects (e.g., physical abnormality that indicates poor tree health such as exfoliating bark, epicormic growth, and fire scars) or pest infestations. The location is optimal for the tree, and the tree is expected to survive long term.
- **Fair:** Overall moderate tree vigor, moderately healthy foliage and cambium with no serious defects or pest infestations. The tree's location may not be optimal for that species, but further decline is not anticipated.
- **Poor:** Overall poor tree vigor, declining foliage and cambium health due to abiotic and/or biotic factors. Notable defects or pest infestations may be present. Typically, poor vigor results when a tree is outcompeted by other plants, or the tree is in the wrong location.
- **Dead:** The tree is dead or very close to death and will not recover.

To determine whether any trees within the Project site meet the definition of "protected," Rincon's cultural resources specialists were consulted to determine if any trees or structures within the Project site were listed as historic on the local historic register.

2.1 Impact Assessment Methodology

The Project's site plan includes permanent and temporary construction impact footprints. Each surveyed tree's trunk, structural root radius (SRR), and canopy dripline were mapped on this site plan using ArcGIS (Geographic Information System). The SRR is the area around a tree in which the roots that physically hold the tree upright are likely to be found, while the canopy dripline refers to the area located directly beneath the outer extent of a tree's canopy. The SRR was calculated using the Kim Coder formula: *SRR (in feet) = 0.5([Trunk DBH inches][0.9])* (2010) and field measurements of the canopy extent in eight cardinal directions were used to map each tree's dripline. For each of the mapped features of the trees (SRR and dripline), ArcGIS was used to calculate the percentage by which the construction footprint encroached within them. Based on the percentages of encroachment, tree impacts were categorized into Avoided, Minor, Severe, or Remove:

- **Avoided:** No encroachment into the SRR or dripline
- **Minor Impact:** Trees in the minor impact category generally would sustain minor to moderate impacts (i.e., 0–30 percent) within the dripline but generally would not be subjected to impacts to the SRR. The post-construction health effects for trees in this category are expected to be none to minor, and temporary. Trees in this category are not expected to be structurally destabilized.
- **Severe Impact:** Trees in the severe impact category generally possessed relatively larger impacts to the dripline (i.e., greater than 30 percent), as well as potential impacts to the SRR. The post-construction health effects for trees in this category are expected to be moderate to severe and could be temporary or permanent. Health effects could include branch dieback, health decline, decay, and possibly death. Trees in this category may be at increased risk of failure during severe weather events that include high winds and saturated soil.
- **Substantial:** Trees in the substantial impact category generally have trunks or the majority of their SRR located within or immediately adjacent to the proposed construction footprint. Removal is required for all trees in this impact category.

3 Results

3.1 Tree Survey Results

A total of 70 mature or protected trees representing three different species (queen palm, Canary Island pine, and Aleppo pine [*Pinus halepensis*]) were documented within the Project Area. During the first three surveys, an additional 42 trees were surveyed; however, the project footprint was updated before the third survey, which subsequently excluded these 42 trees from the Project Area. Three additional species (Coast live oak [*Quercus agrifolia*], melalecua [*Melaleuca quinquenervia*], and red willow [*Salix laevigata*]) were surveyed during the first two surveys that are not within the updated Project Area. The only trees discussed in the remainder of the report are the 70 trees that fall within the 1.98-acre Project Area.

The highest density of mature or protected trees are located surrounding the inside perimeter of the CalPeak EEPP (67 trees). The remaining three trees are located in the northern yard of the existing auto body shop. All of the trees that are present in the Project Area are introduced, non-native landscaping trees. Most of the trees surveyed are in fair health, with no structural abnormalities or hazardous conditions. No trees or structures on the property are listed in the local historic register. Table 2 provides the total number of each species surveyed along with the species' origin.

Table 2 Trees Documented by Species within the Project Area

Tree Species	Origin	Count
Aleppo pine (*Pinus halepensis*)	Introduced	1
Canary Island pine (*Pinus canariensis*)	Introduced	66
Queen palm (*Syagrus romanzoffiana*)	Introduced	3
Total		70

All attribute data collected for the 70 trees is provided in a table in Appendix A, including tree identification number, species, protection status, health condition, number of trunks, DBH(s), aggregate DBH, SRR, height, canopy spread (in eight cardinal directions), and any relevant notes. Figure 3 depicts each mature and/or protected tree within the Project Area overlayed on the Project's site plan. Photographs of each surveyed tree are provided in Appendix B.

Figure 3 Tree Location Map

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24-16971 Bio
Fig 3 Tree Locations

3.2 Impact Assessment Results

Based on the location of the construction footprint, 58 trees would not be impacted by the Project (Avoided), three trees would experience Minor Impacts, one tree would experience Severe Impacts, and eight trees would experience Substantial Impacts. Table 3 lists each tree with impacts anticipated by identification number and includes its species, protection status, aggregate DBH, anticipated impact severity, if removal is required, and the proposed or potential impact description. Figure 4 and Figure 5 depict the anticipated impacts to the surveyed trees and displays the location of each tree's trunk, SRR, and dripline overlayed on top of the Project's site plans.

Table 3 Tree Impact Summary

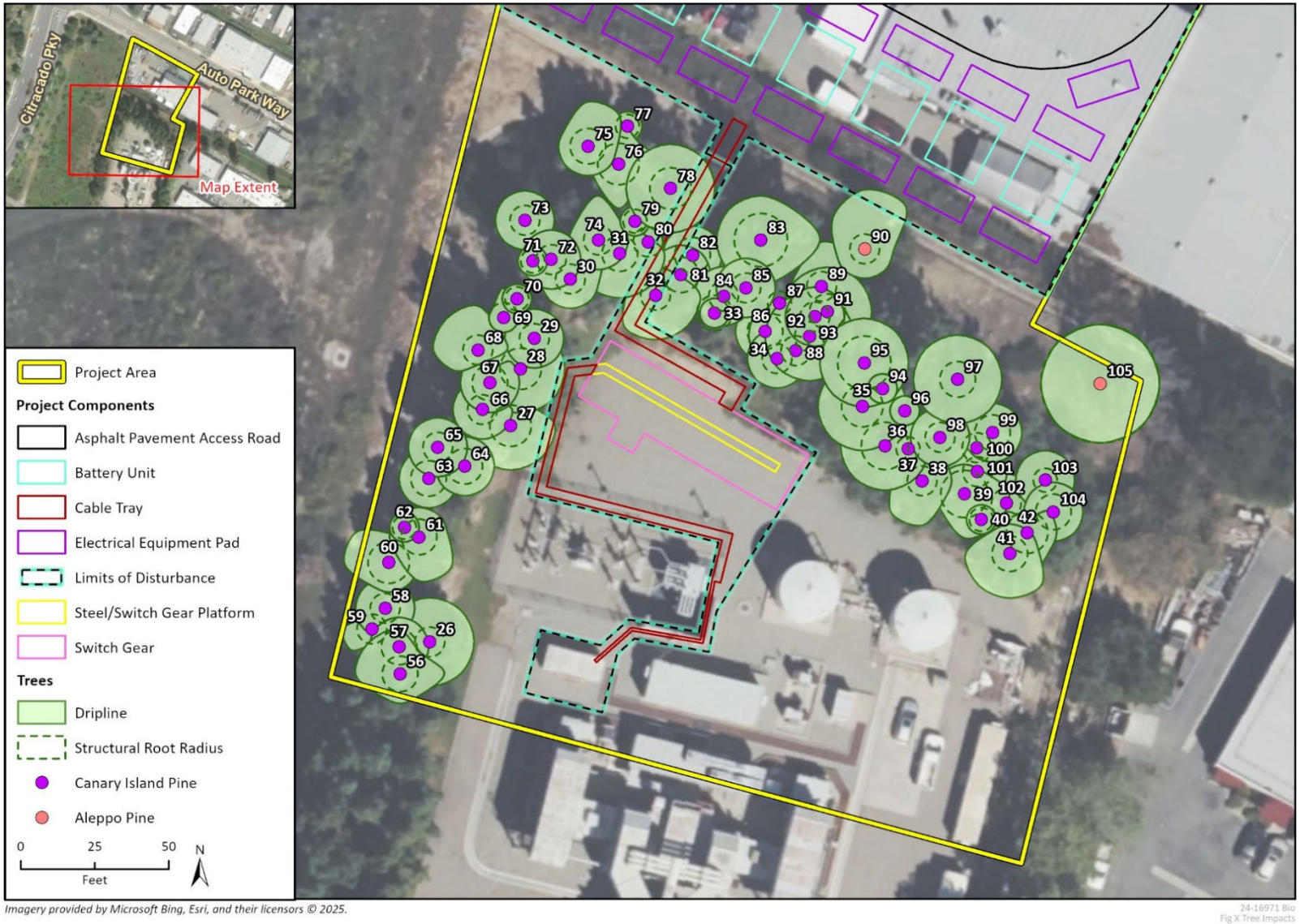
Tree Number	Species	Aggregate DBH (in)	Protection Class	Anticipated Impact Severity	Removal Required?	Proposed or Potential Impact Description
27	Canary Island Pine	16	Mature	Minor	No	Cable Tray
28	Canary Island Pine	16	Mature	Minor	No	
31	Canary Island Pine	13	Mature	Substantial	Yes	
32	Canary Island Pine	12	Mature	Substantial	Yes	
78	Canary Island Pine	16	Mature	Substantial	Yes	
80	Canary Island Pine	11	Mature	Severe	No	
81	Canary Island Pine	14	Mature	Substantial	Yes	
82	Canary Island Pine	13	Mature	Substantial	Yes	
90	Aleppo Pine	12	Mature	Minor	No	Electrical Equipment Pad on North Parcels
110	Queen Palm	11	Mature	Substantial	Yes	
111	Queen Palm	12	Mature	Substantial	Yes	
112	Queen Palm	12	Mature	Substantial	Yes	

Figure 4 Tree Impacts – North

Imagery provided by Microsoft Bing, Esri, and their licensors © 2025.

24-16971 Bio
Fig X Tree Impacts

Figure 5 Tree Impacts - South



4 Tree Protection Measures

The following tree protection measures shall be implemented, as needed, for all mature and protected trees that have a portion of their dripline within the limits of disturbance that would not be removed (i.e., trees with minor and severe impacts; Table 3).

1. A protective fence located at least 6 feet outside the dripline of the tree shall be installed (i.e., a tree protection zone [TPZ]). Fencing shall be at least 5 feet high, highly visible, staked to prevent collapse, and include signs placed in 15-foot intervals that identify the protection area. Protective fencing may not be removed until construction is complete.
2. Construction activities conducted within the TPZ shall be done with hand tools to the maximum extent feasible. If the use of hand tools is infeasible, work may be accomplished with mechanical equipment. If equipment tires or tracks must enter the TPZ, 1-inch-thick plywood or steel plates shall be placed down to minimize soil compaction. All work conducted with mechanized equipment within the TPZ shall be overseen by a certified arborist.
3. A certified arborist shall direct and oversee any grading, trenching, or root pruning within the SRR.
4. All tree pruning shall be done in accordance with the American National Standards Institute A300 for tree pruning and safety. Pruning should never exceed 25 percent of the overall canopy, and all cuts shall be made at the lateral branch collar.
5. Equipment or materials storage shall not occur within the TPZ.
6. Appropriate best management practices shall be implemented for the handling and storage of fuel, oil, and hazardous waste within the limits of construction.
7. Grading shall be designed to avoid ponding and ensure proper drainage within the dripline of mature and protected trees.
8. Any roots of 1 inch in diameter or greater encountered during construction must be cleanly cut.

Mature and protected trees with substantial impacts anticipated and any mature or protected tree that receives unanticipated impacts that are likely to result in mortality over time shall be mitigated for as described in Section 5 below.

5 Tree Replacement Requirements

The Project's site plan indicates that eight mature trees would need to be removed to accommodate the necessary space to construct the Project. Five of those trees would be removed for the aboveground, gen-tie Cable Tray installation on the northern portion of the EEPP, and three would be removed in the Electrical Equipment Pad yard south of Auto Park Way. Pursuant to the Grading Ordinance, removal of any mature tree shall be replaced at a 1:1 ratio and the removal of any protected tree shall be mitigated at a 2:1 ratio. Therefore, a total of eight replacement trees would be required. It is recommended to replace trees on-site if possible, although replacement off-site within city limits is permissible. The minimum spacing of the replacement trees shall be 10 feet on-center for both species and their locations shall be determined by the properties landscape contractor. Table 4 lists each removal tree by identification number and includes its species, aggregate DBH, protection class, the required mitigation ratio for replacement, and the required amount of replacement trees. Replacement with the use of 1- or 5-gallon containers is recommended to ensure a higher chance of establishment success and due to the absence of nursery container stock that matches the removal trees calipers.

Table 4 Tree Replacement Summary

Tree ID	Species	Aggregate DBH (in)	Protection Class	Mitigation Ratio	Required Replacement Trees
31	Canary Island pine	13	Mature tree	1:1	1
32	Canary Island pine	12	Mature tree		1
78	Canary Island pine	16	Mature tree		1
81	Canary Island pine	14	Mature tree		1
82	Canary Island pine	13	Mature tree		1
110	Queen palm	11	Mature tree		1
111	Queen palm	12	Mature tree		1
112	Queen palm	22	Mature tree		1
Total					**8**

If Severe or Substantial Impacts unexpectedly occur to additional mature or protected trees that are likely to result in mortality overtime, additional replacement trees would be required. Replacement trees shall come from at minimum 1-gallon containers and be maintained for at least three years. Planting of the replacement trees shall abide by the following guidelines:

- Installation of replacement trees shall be completed in the fall to maximize the potential for successful establishment.
- Planting shall be supervised by a person with expertise in the planting, care, and maintenance of trees. Best management practices such as excavating only the soil needed for planting, retaining and reusing the native soil on-site, ensuring the root ball is placed at the correct grade, and inspecting the trees to ensure they are healthy prior to installation should be used.
- Weeds shall be removed from the planting locations and within 3 feet of the locations prior to planting and maintained throughout the monitoring period.
- Decomposable gopher baskets shall be placed in the planting holes to prevent root predation.

- Each replacement tree shall be protected with 48-inch-high deer fencing and encircle each tree by a 4-foot radius. The galvanized wire fence shall be 11 gage wire at the top and bottom and have a 14.5 gage fill. The fencing will be secured at four locations along the circumference with 72-inch metal t-posts driven 18 inches below grade (if planted in a natural area).
- Support stakes shall be installed to prevent trees from falling over.
- Soil amendments (e.g., fertilizer and compost) and mulch shall be applied during planting and maintained throughout the monitoring period, as applicable. No less than a 3-inch layer of mulch should be applied with care to not allow the mulch to contact the tree trunk.
- A temporary drip irrigation system will be installed to water the trees for no less than three years. Irrigation needs shall be adjusted in accordance with the precipitation received during each rainy season. A small berm ring approximately 2–feet surrounding each trunk shall be installed to assist in moisture retention.
- Trees shall be pruned back only to remove broken limbs or dead wood. It may be necessary to conduct corrective pruning to help train or balance the individual tree crowns. Otherwise, pruning should not be performed. ISA and approved ANSI pruning specifications should be followed for all pruning activities. Tree pruning shall occur from mid-September to mid-February to prevent stress to the tree and to avoid the nesting bird season (approximately mid-February to mid-September). In no case shall more than 20 percent of an individual tree crown be trimmed or pruned.

The applicant proposes to plant up to eight replacement trees on appropriate locations on the EEPP site to mitigate for the trees that are removed associated with Project development. The applicant plans to determine the final number of trees to be planted as well as the locations once the number of impacted trees is verified following Project construction.

If on-site replanting is proven to not be possible, planting off-site is another feasible alternative along with the purchasing of credit into an off-site mitigation bank, such as the Daley Ranch Conservation Bank in the city or the donation of funds into a local agency, such as the Resource Conservation District of Greater San Diego County that plants and maintains native trees. The purchased mitigation credit or donated funds should be at the same cost as the estimated total cost of replacement for the removal trees (at the same caliper and species plus installation and maintenance).

6 References

City of Escondido. 2001. Municipal Regulations; Grading Ordinance. Available at: https://www.escondido.org/Data/Sites/1/media/pdfs/Utilities/GradingErosionControlOrdinance.pdf. Accessed January 2024.

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Appendix A

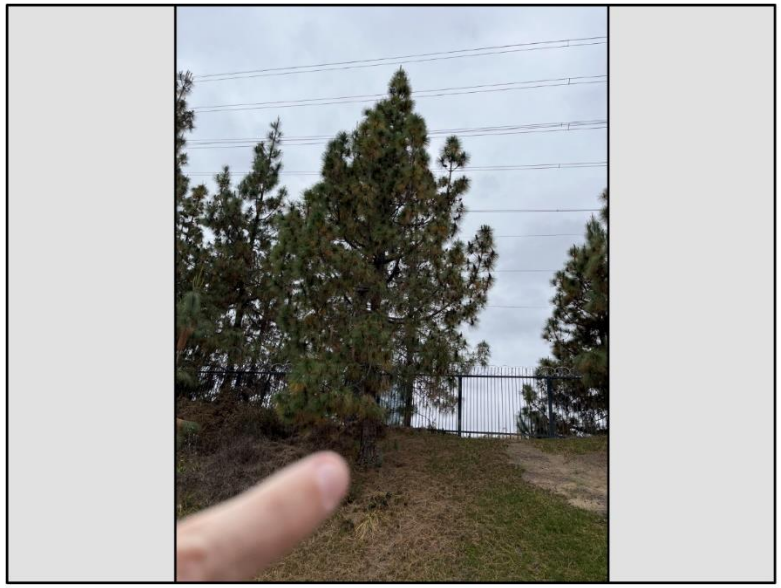
Tree Inventory Table

Tree ID	Species	Protection Class	Health Condition	Number of Trunks	DBH (in)	Aggregate DBH (in)	Structural Root Radius	Height (ft)	Canopy Spread in Eight Cardinal Directions								Notes
									N	NE	E	SE	S	SW	W	NW	
27	Canary island pine	Mature	Fair	1	16	16	7	48	15	10	15	15	15	15	15	15	
28	Canary island pine	Mature	Fair	1	16	16	7	49	15	15	15	15	15	15	15	15	
29	Canary island pine	Mature	Fair	1	11	11	5	53	10	10	10	10	10	10	10	10	
30	Canary island pine	Mature	Fair	1	10	10	5	36	10	15	10	10	10	10	10	10	
31	Canary island pine	Mature	Fair	1	13	13	6	34	10	10	15	15	15	15	10	10	
32	Canary island pine	Mature	Fair	1	12	12	5	38	10	10	15	15	15	15	10	10	
33	Canary island pine	Mature	Fair	1	14	14	6	51	5	5	5	5	5	5	5	5	
34	Canary island pine	Mature	Fair	1	10	10	5	34	10	10	10	10	10	10	10	10	
35	Canary island pine	Mature	Fair	1	15	15	7	50	15	15	15	15	15	15	15	15	
36	Canary island pine	Mature	Fair	1	17	17	8	47	15	15	15	15	15	15	15	15	
37	Canary island pine	Mature	Fair	1	8	8	4	47	10	10	5	5	10	5	5	10	
38	Canary island pine	Mature	Fair	1	12	12	5	51	10	10	10	10	15	15	10	10	
39	Canary island pine	Mature	Fair	1	17	17	8	55	10	10	15	15	15	10	10	10	
40	Canary island pine	Mature	Fair	1	8	8	4	39	5	5	5	5	5	5	5	5	
41	Canary island pine	Mature	Fair	1	14	14	6	44	10	10	10	15	15	15	15	10	
42	Canary island pine	Mature	Fair	1	15	15	7	55	5	10	10	10	15	15	10	10	
56	Canary island pine	Mature	Fair	1	13	13	6	49	15	10	15	10	10	10	15	15	
57	Canary island pine	Mature	Fair	1	14	14	6	47	10	10	10	10	10	10	10	10	
58	Canary island pine	Mature	Fair	1	11	11	5	52	10	10	10	10	10	10	10	10	
59	Canary island pine	Mature	Fair	1	11	11	5	36	5	5	5	5	5	10	10	5	
60	Canary island pine	Mature	Fair	1	15	15	7	31	10	10	10	10	10	10	15	15	
61	Canary island pine	Mature	Fair	1	14	14	6	40	10	10	10	15	15	10	10	10	
62	Canary island pine	Mature	Fair	1	8	8	4	33	5	5	5	5	5	5	5	5	
63	Canary island pine	Mature	Fair	1	13	13	6	33	10	10	10	10	10	10	10	10	
64	Canary island pine	Mature	Fair	1	13	13	6	41	10	10	10	10	10	10	10	10	
65	Canary island pine	Mature	Fair	1	11	11	5	40	10	10	10	10	10	10	10	10	
66	Canary island pine	Mature	Fair	1	11	11	5	40	10	5	10	10	10	10	10	10	
67	Canary island pine	Mature	Fair	1	13	13	6	33	5	10	10	10	10	10	10	10	
68	Canary island pine	Mature	Fair	1	12	12	5	46	15	10	10	5	5	10	15	15	
69	Canary island pine	Mature	Fair	1	10	10	5	49	10	5	5	5	5	5	5	5	
70	Canary island pine	Mature	Fair	1	8	8	4	25	5	5	5	5	5	5	5	5	Previous trunk destabilization, leaning on fence, corrected lean
71	Canary island pine	Mature	Fair	1	8	8	4	35	5	5	5	5	5	5	5	5	
72	Canary island pine	Mature	Fair	1	11	11	5	37	10	10	10	10	10	10	10	10	
73	Canary island pine	Mature	Fair	1	12	12	5	33	10	10	10	10	10	10	10	10	
74	Canary island pine	Mature	Fair	1	12	12	5	47	15	10	10	10	10	10	10	10	
75	Canary island pine	Mature	Fair	1	13	13	6	35	15	15	10	10	10	10	10	10	
76	Canary island pine	Mature	Fair	1	16	16	7	45	15	10	15	10	15	10	10	15	
77	Canary island pine	Mature	Fair	1	8	8	4	25	5	5	5	5	5	5	5	5	

Tree ID	Species	Protection Class	Health Condition	Number of Trunks	DBH (in)	Aggregate DBH (in)	Structural Root Radius	Height (ft)	Canopy Spread in Eight Cardinal Directions								Notes
									N	NE	E	SE	S	SW	W	NW	
78	Canary island pine	Mature	Fair	1	16	16	7	42	15	15	15	15	15	15	15	15	
79	Canary island pine	Mature	Fair	1	9	9	4	45	5	5	5	5	5	5	5	5	
80	Canary island pine	Mature	Fair	1	11	11	5	40	5	5	5	5	5	5	5	5	
81	Canary island pine	Mature	Fair	1	14	14	6	45	10	10	10	10	10	10	10	10	
82	Canary island pine	Mature	Fair	1	13	13	6	49	10	10	10	10	10	10	10	10	
83	Canary island pine	Mature	Fair	1	20	20	9	65	15	15	20	15	15	15	15	15	
84	Canary island pine	Mature	Fair	1	12	12	5	33	10	10	10	10	10	10	10	10	
85	Canary island pine	Mature	Fair	1	11	11	5	46	10	10	10	10	10	10	10	10	
86	Canary island pine	Mature	Fair	1	13	13	6	33	5	5	5	5	10	10	10	10	
87	Canary island pine	Mature	Poor	1	8	8	4	25	1	1	5	20	25	15	5	1	Tree has destabilized and is being held up by another tree. Likely to fall onto fence. Removal recommended.
88	Canary island pine	Mature	Fair	1	11	11	5	40	10	10	10	10	10	10	10	10	
89	Canary island pine	Mature	Fair	1	12	12	5	49	15	15	10	10	10	5	10	10	
90	Aleppo pine	Mature	Good	1	12	12	5	34	20	20	10	10	10	10	10	15	
91	Canary island pine	Mature	Fair	1	13	13	6	57	15	15	15	15	15	15	15	15	
92	Canary island pine	Mature	Fair	1	10	10	5	47	10	10	10	10	10	10	10	10	
93	Canary island pine	Mature	Fair	1	12	12	5	39	15	15	15	15	15	15	15	15	
94	Canary island pine	Mature	Fair	1	10	10	5	47	5	5	5	5	5	5	5	5	
95	Canary island pine	Mature	Fair	1	19	19	9	57	15	15	15	15	15	15	15	15	
96	Canary island pine	Mature	Fair	1	11	11	5	61	5	5	5	5	5	5	5	5	
97	Canary island pine	Mature	Fair	1	14	14	6	53	15	15	15	15	15	15	15	15	
98	Canary island pine	Mature	Fair	1	10	10	5	48	10	10	10	10	10	10	10	10	
99	Canary island pine	Mature	Fair	1	13	13	6	40	10	10	10	10	10	10	10	10	
100	Canary island pine	Mature	Fair	1	11	11	5	56	10	10	10	10	10	10	10	10	
101	Canary island pine	Mature	Fair	1	10	10	5	36	10	10	10	10	10	10	10	10	
102	Canary island pine	Mature	Fair	1	12	12	5	40	10	10	10	10	10	10	10	10	
103	Canary island pine	Mature	Fair	1	8	8	4	52	10	10	10	10	10	10	10	10	
104	Canary island pine	Mature	Fair	1	13	13	6	50	10	10	10	10	10	10	10	10	
105	Aleppo pine	Mature	Dead	1	22	22	20	40	20	20	20	20	20	20	20	20	Tree could fail and damage adjacent structure downhill to the north. Removal recommended.
110	Queen palm	Mature	Good	1	11	11	5	20	6	4	6	6	5	5	1	6	
111	Queen palm	Mature	Good	1	12	12	5	12	3	4	4	4	3	0	0	4	
112	Queen palm	Mature	Good	1	12	12	5	25	5	4	5	5	4	2	1	3	

Appendix B

Photographs

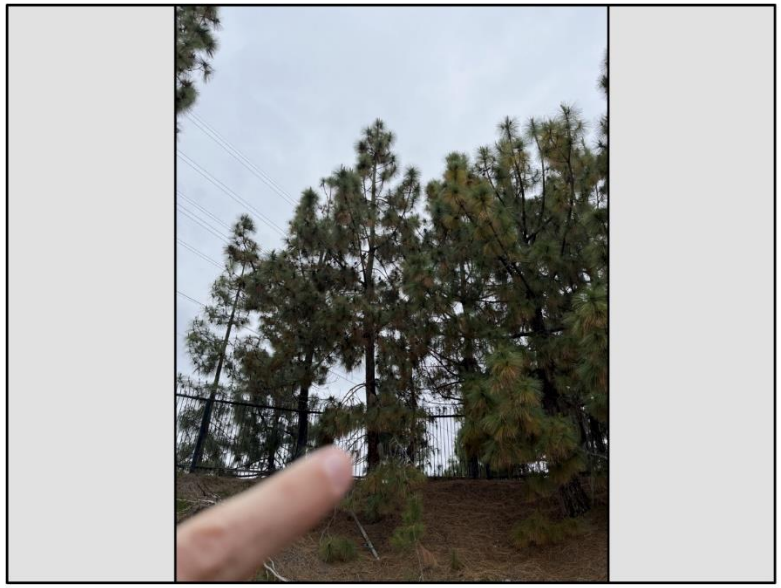


Tree 26

Tree 27

Tree 28

Tree 29



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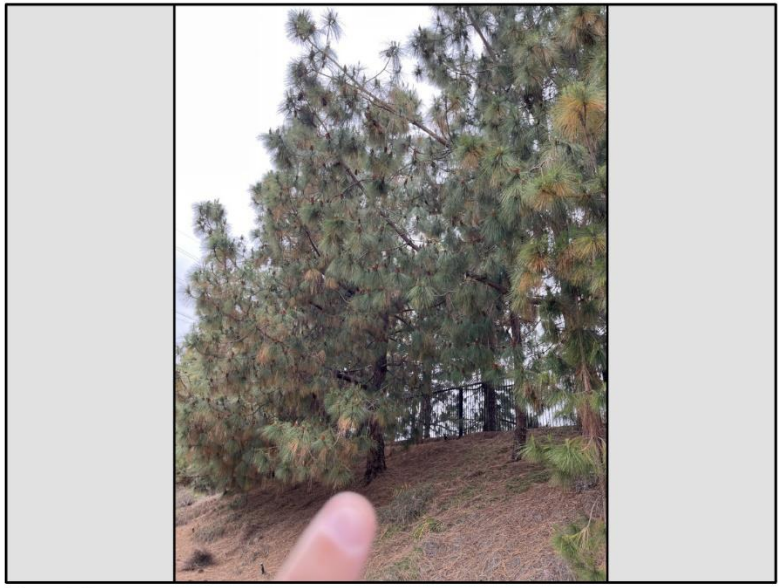
Tree 31

Tree 32

Tree 33

Tree 34

Tree 35



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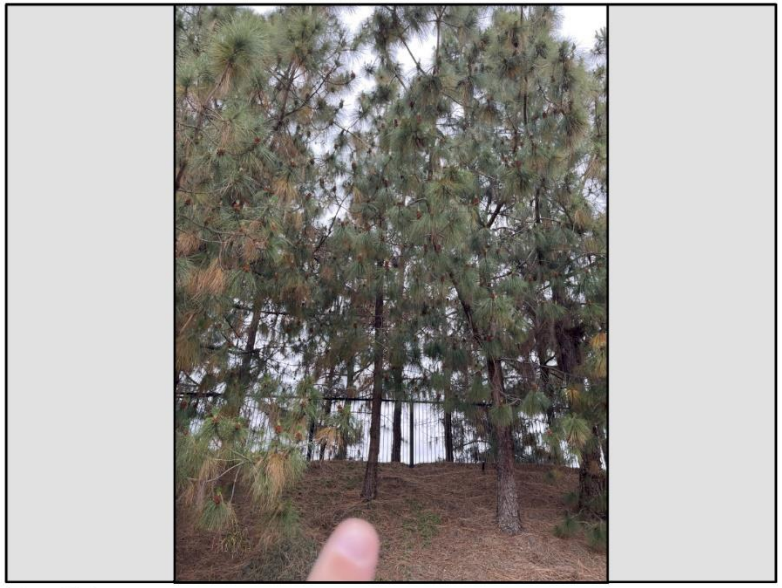

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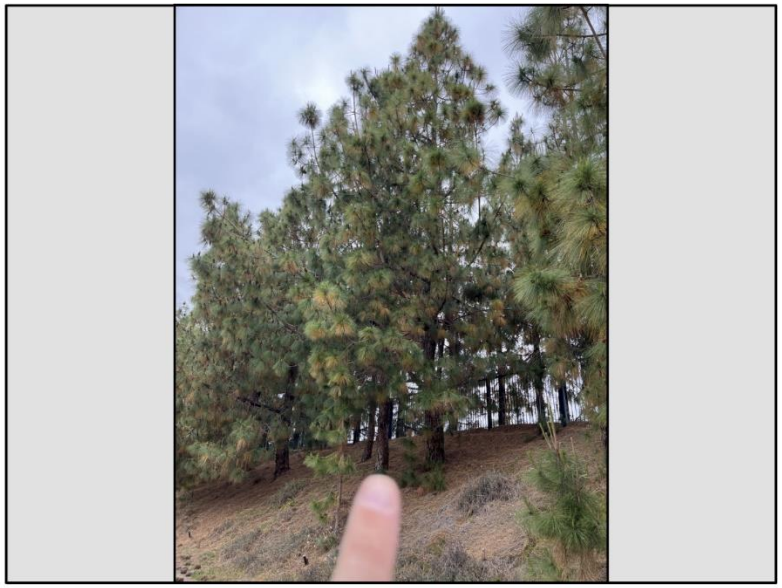

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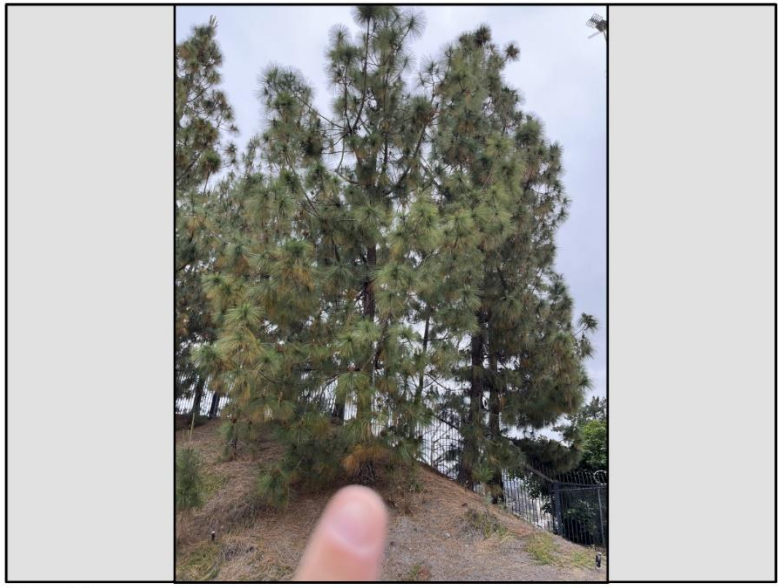

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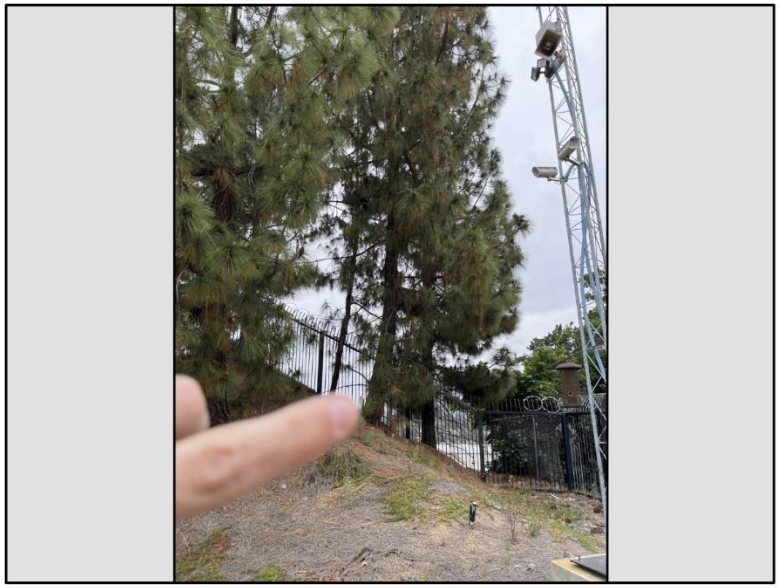

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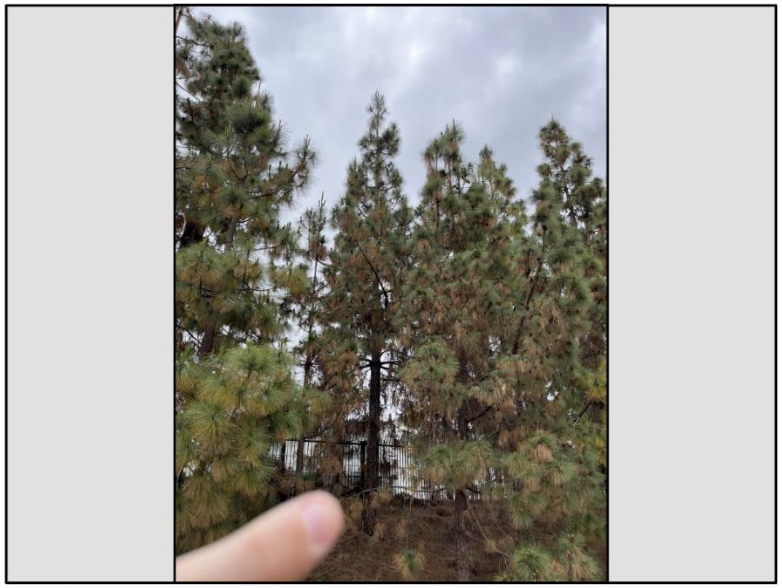

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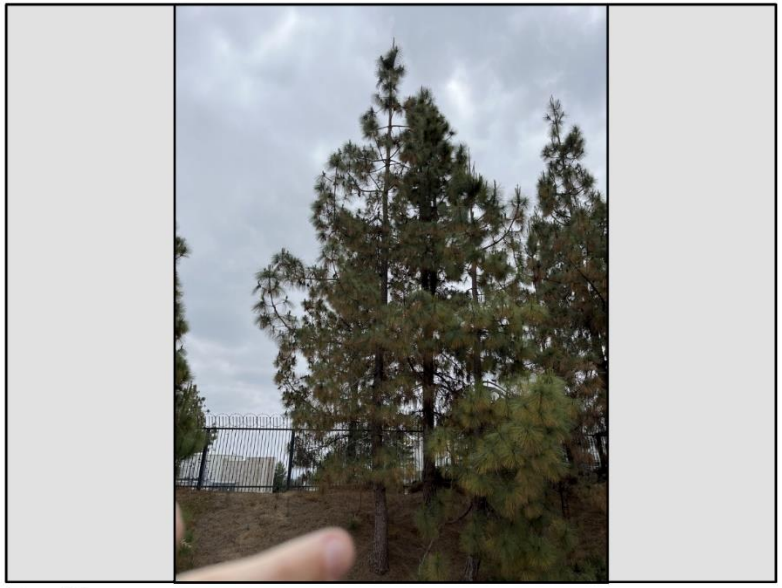

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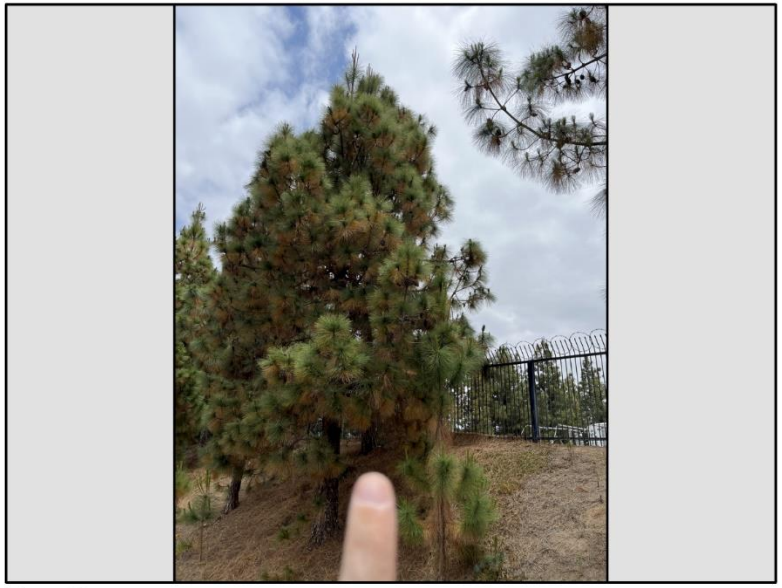

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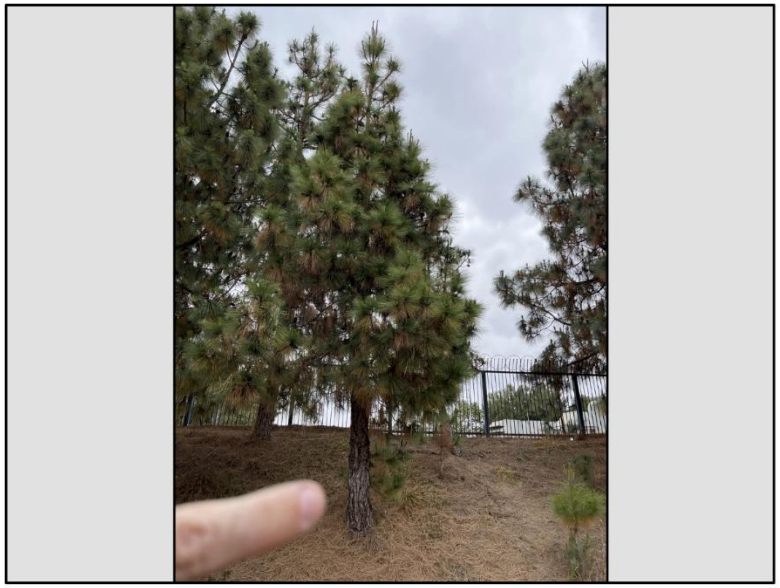

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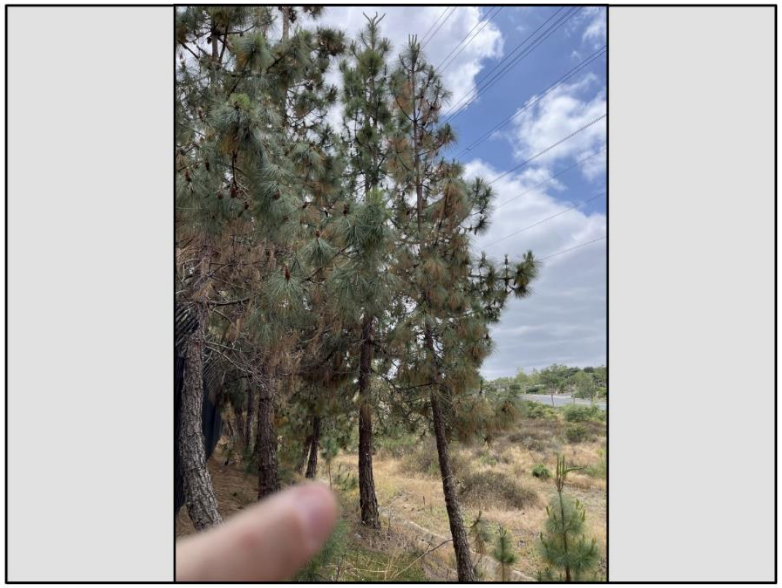
Tree 64

Tree 65

Tree 66

Tree 67



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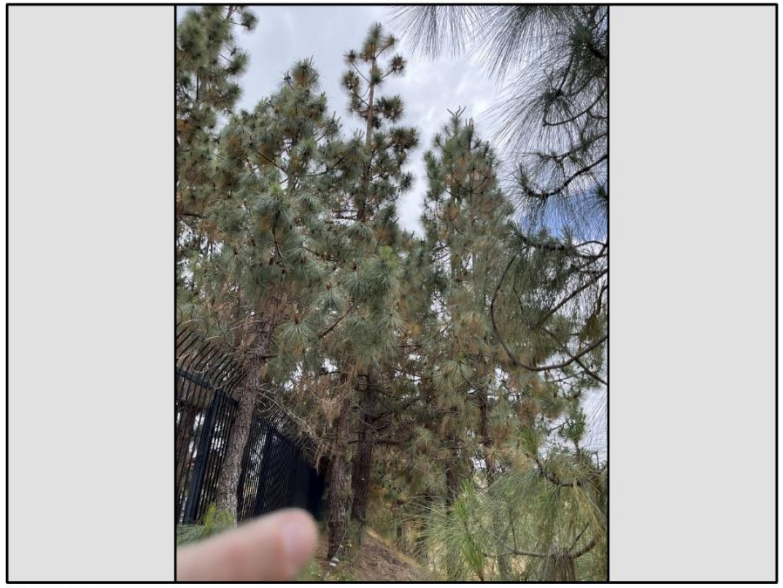

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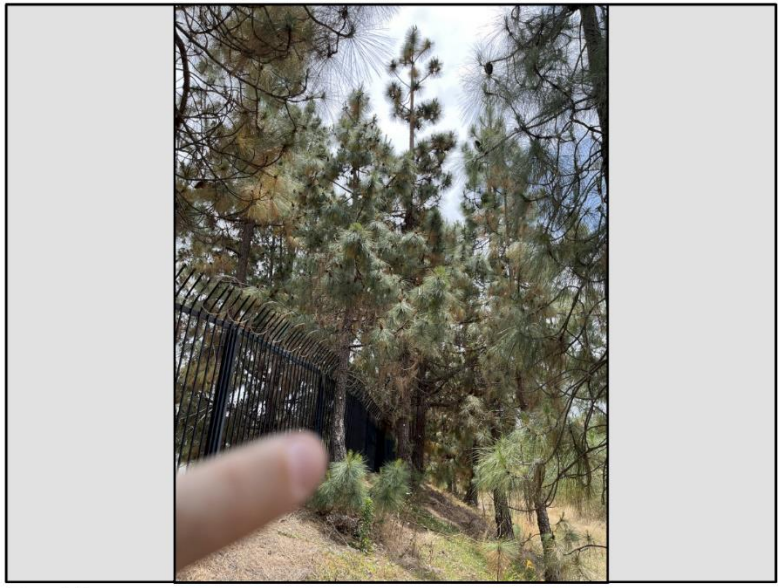

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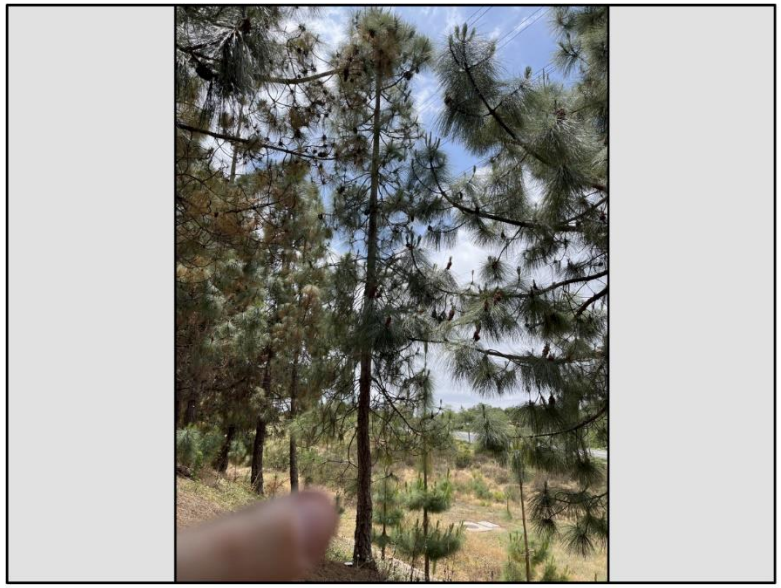

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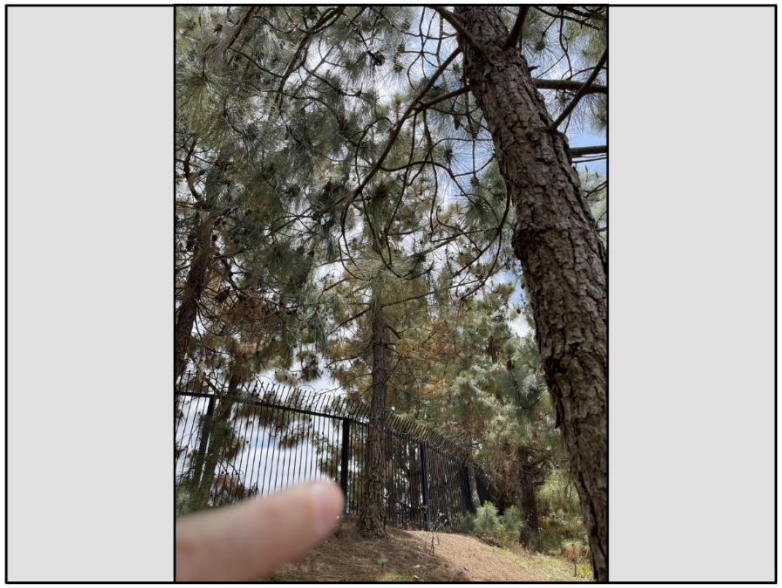

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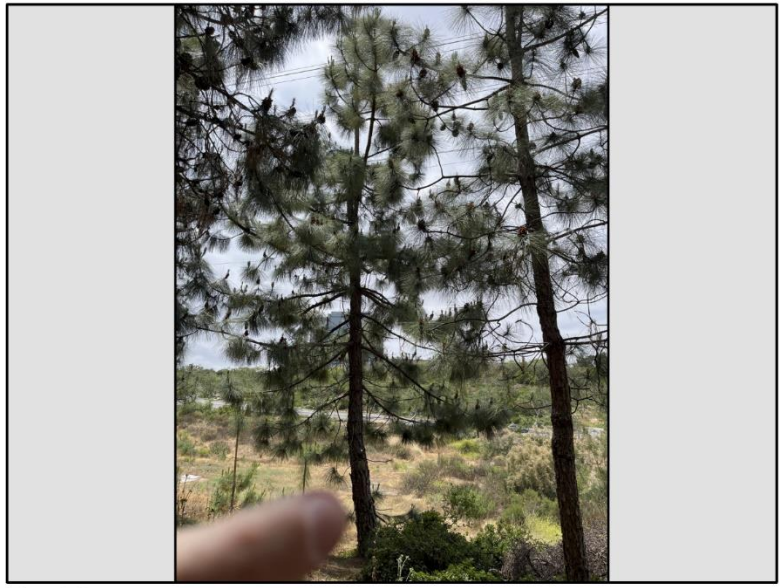

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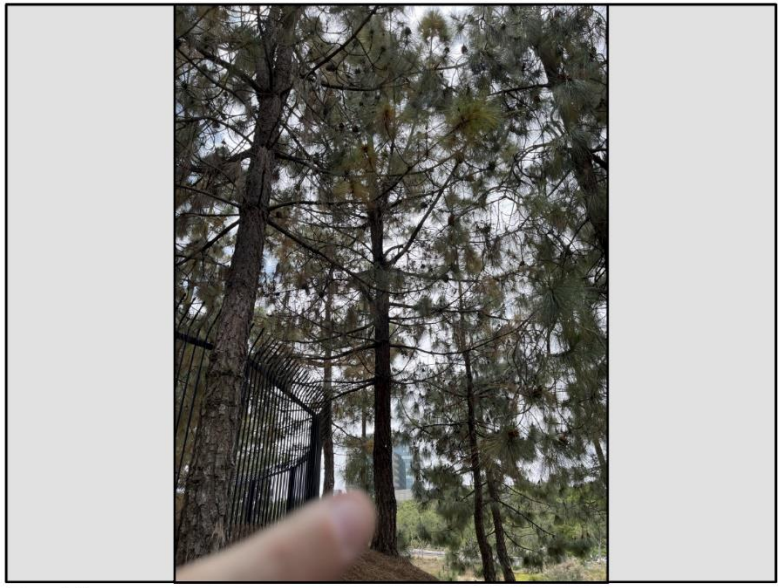

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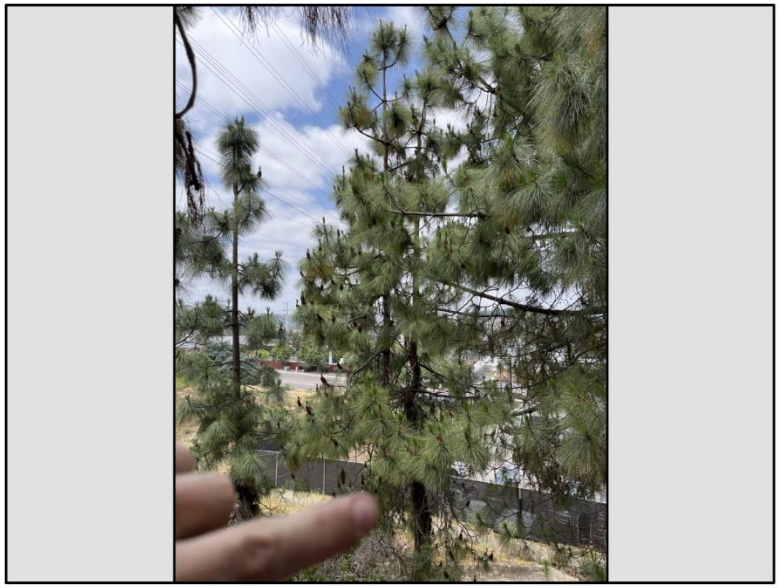

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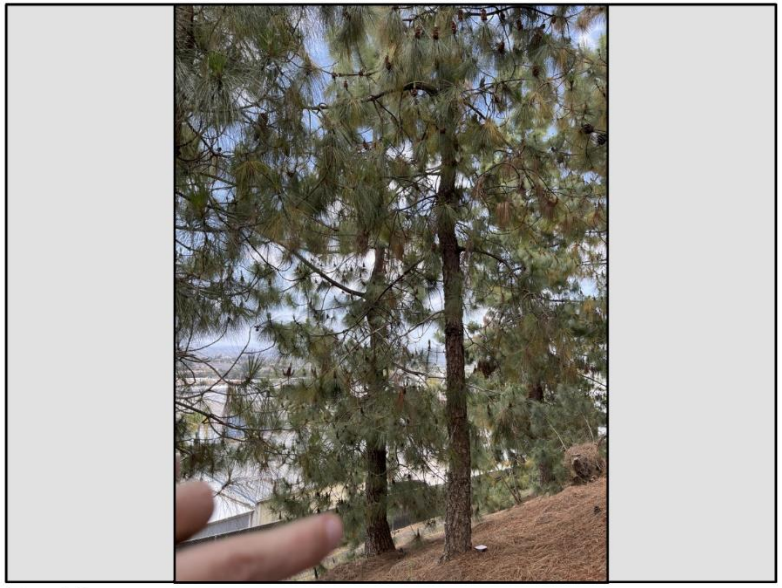
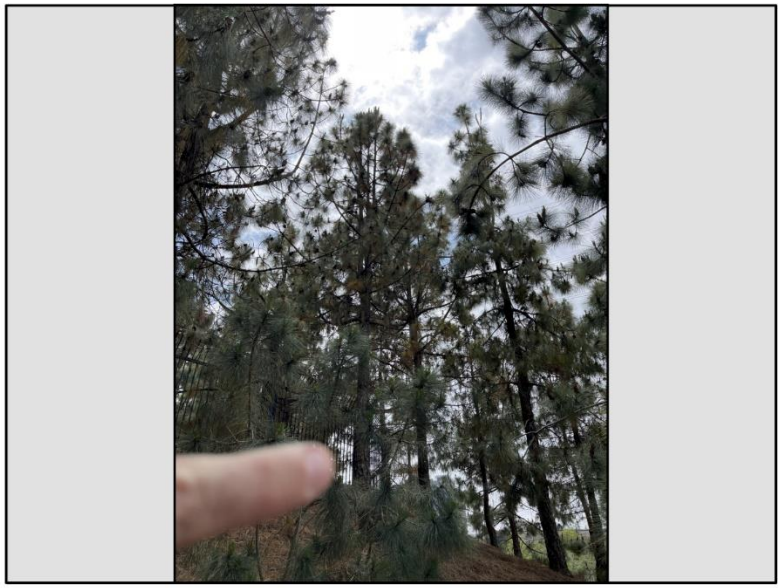
Tree 76

Tree 77



Tree 78

Tree 79



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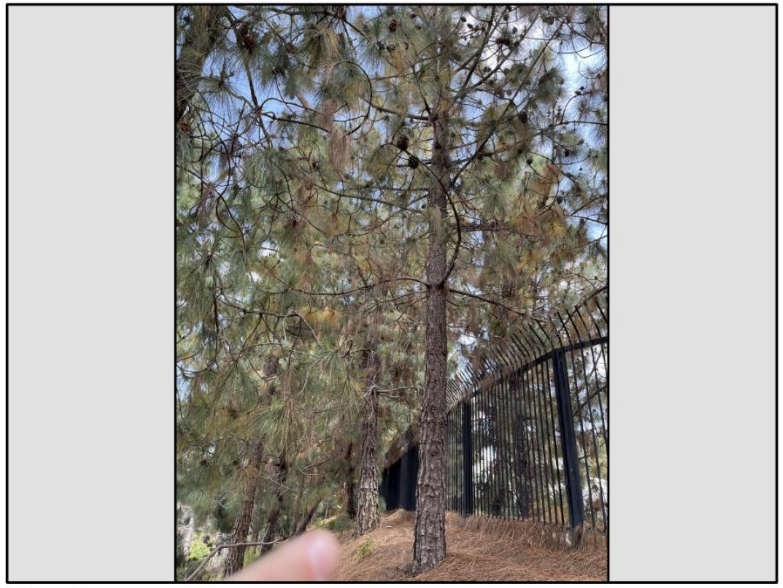

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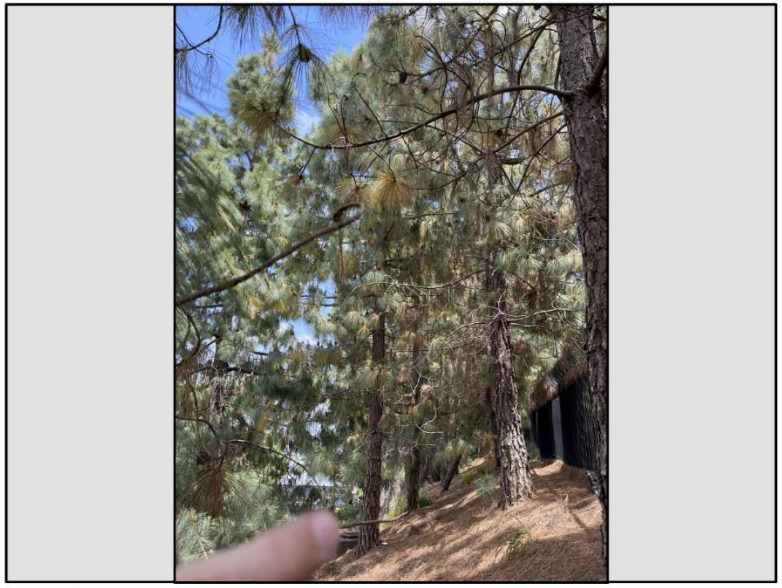

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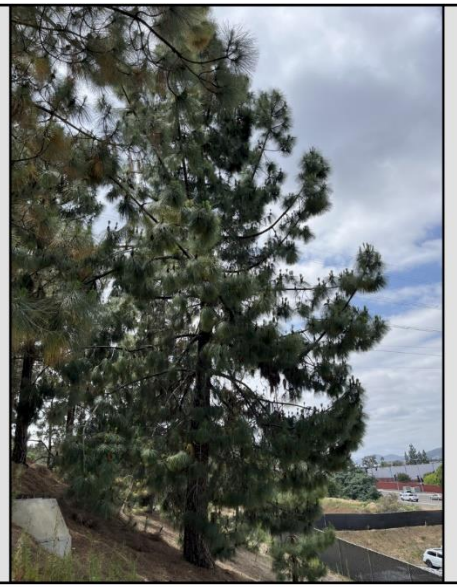

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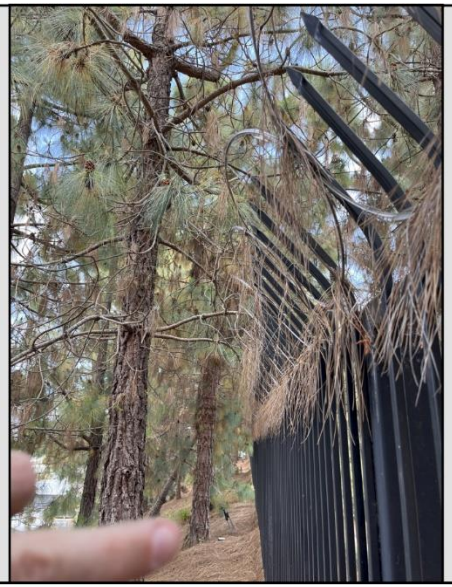

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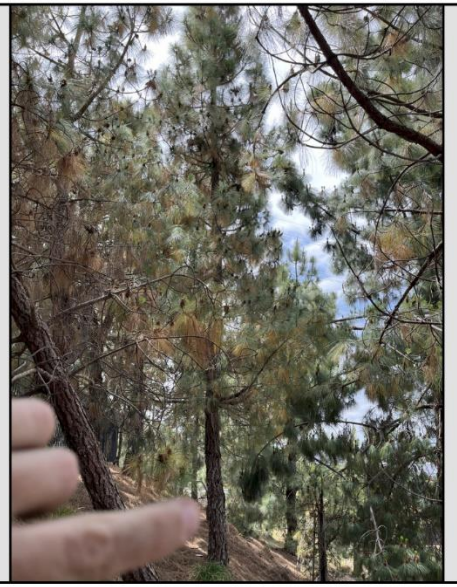

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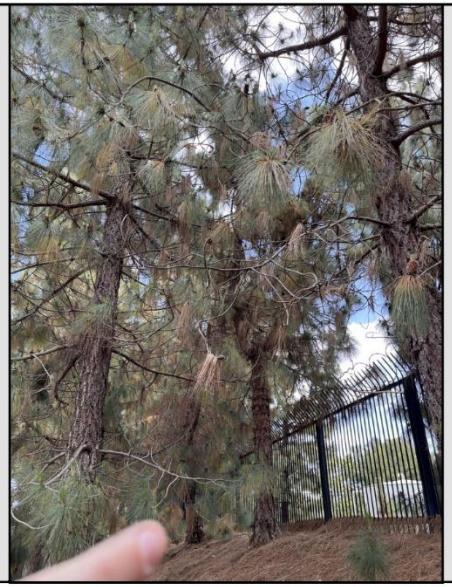

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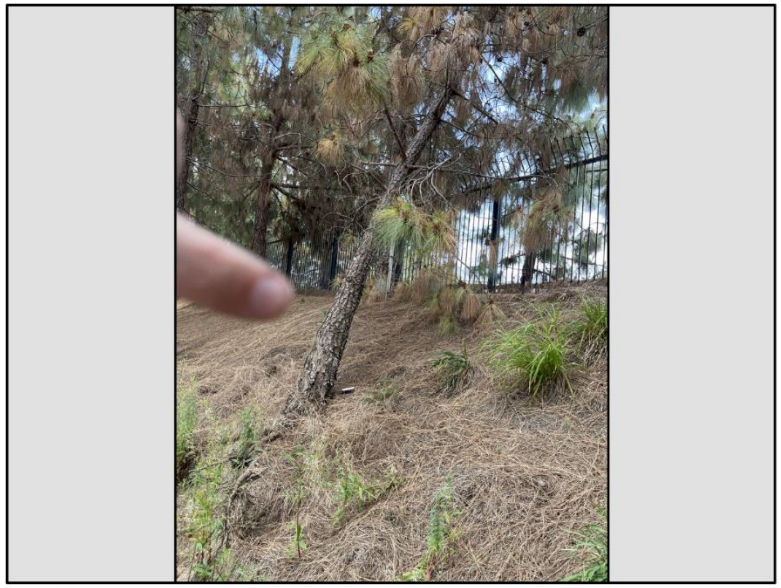

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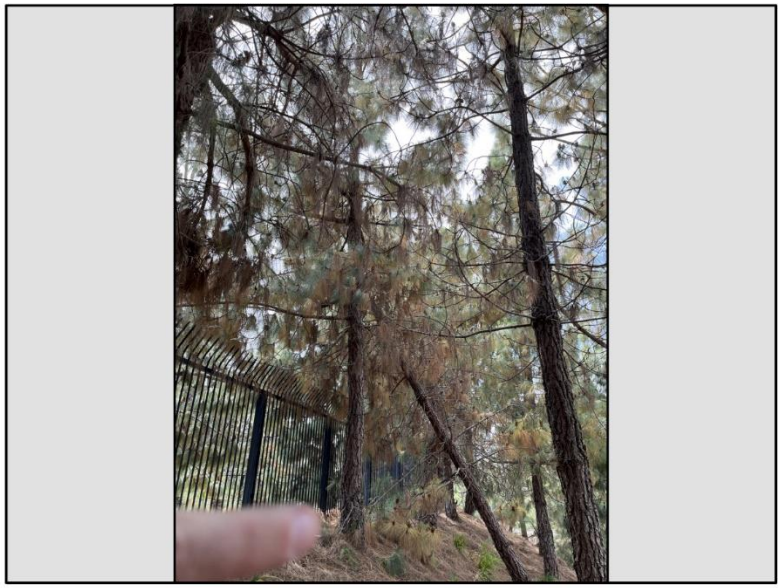

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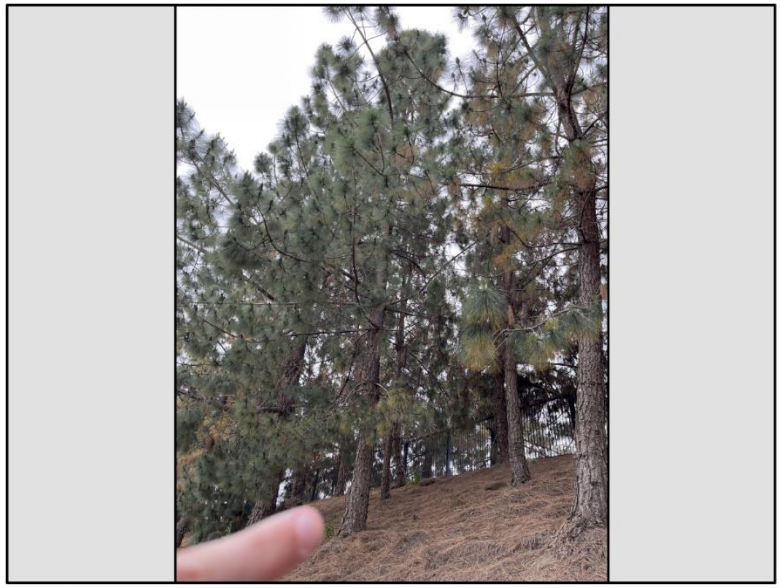
Tree 89

Tree 90



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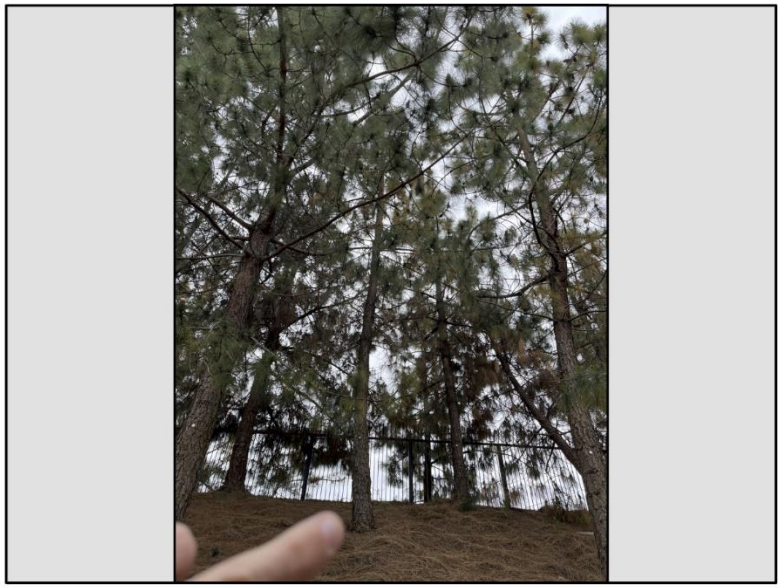

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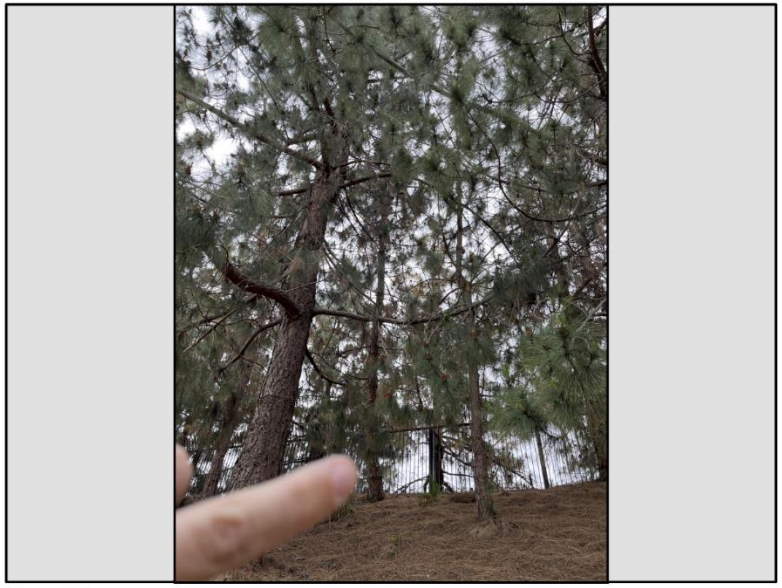

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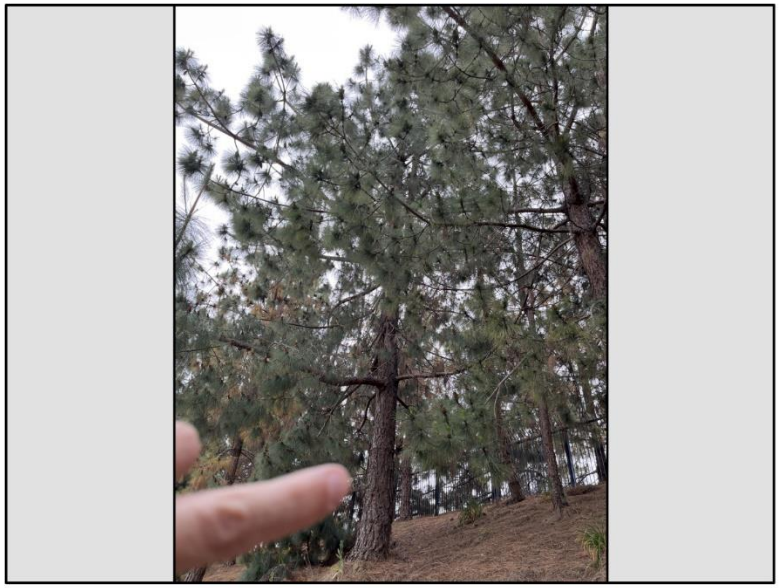

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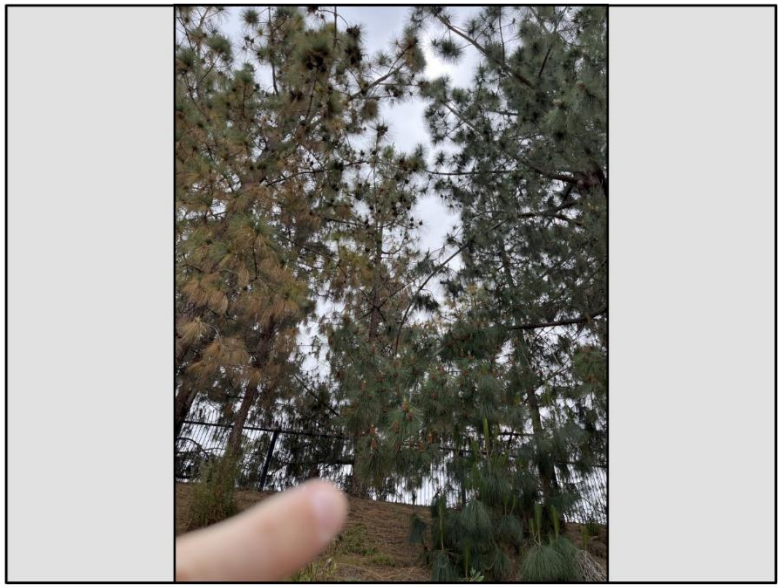

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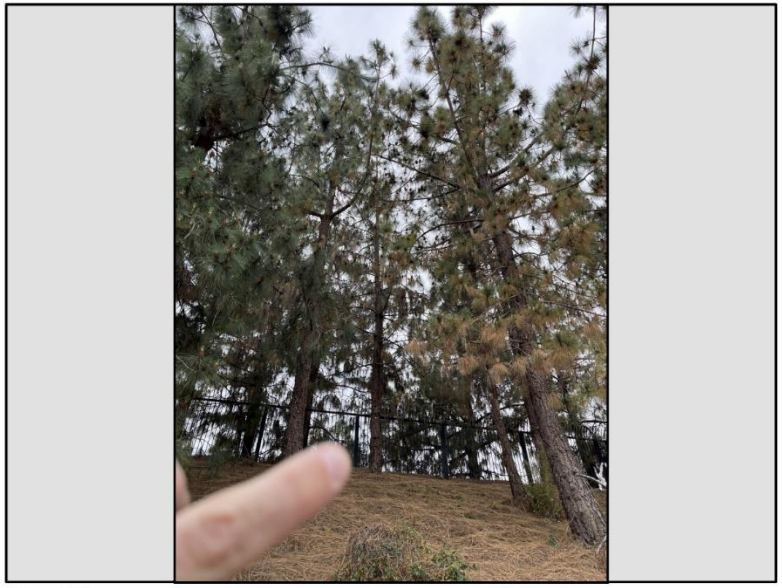

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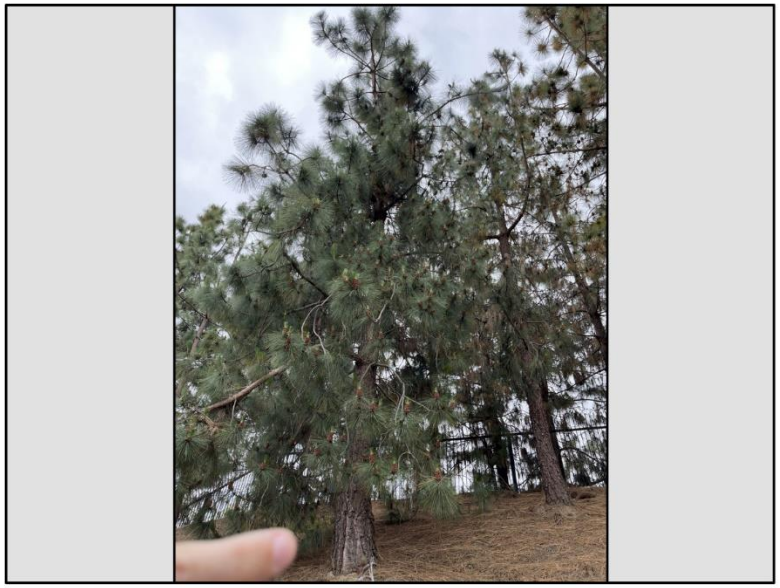

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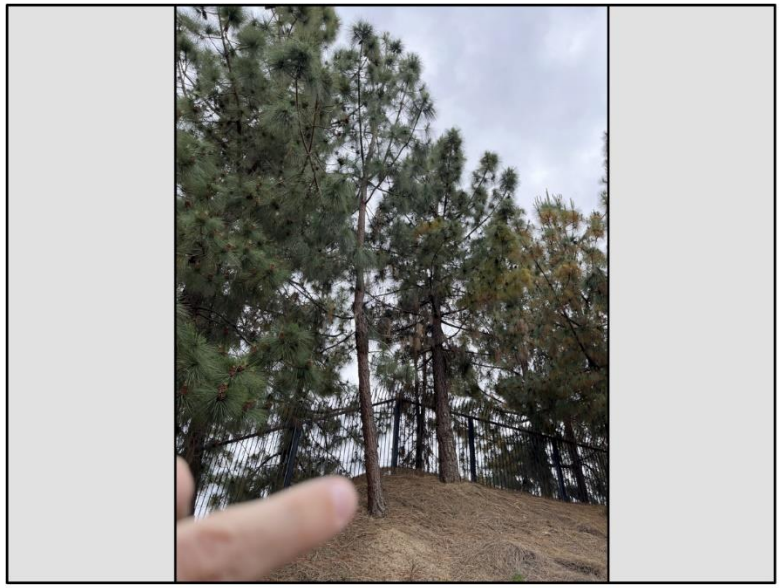
Tree 100

Tree 101

Tree 102



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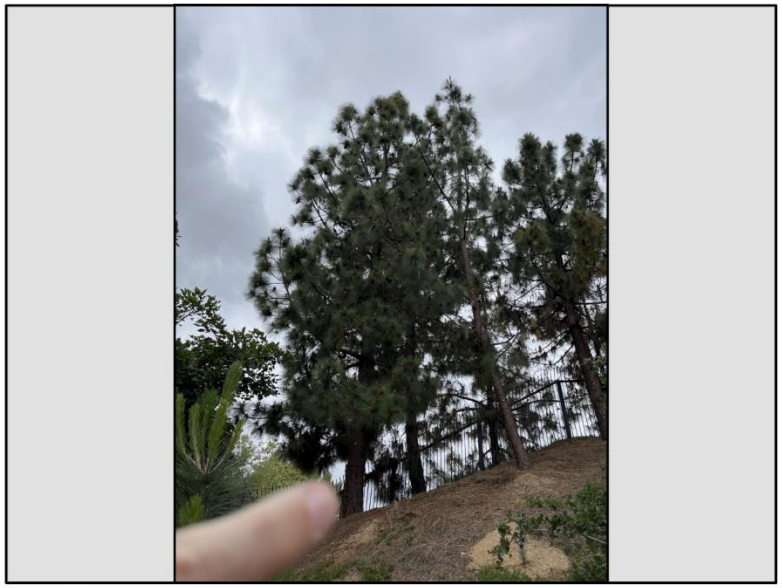

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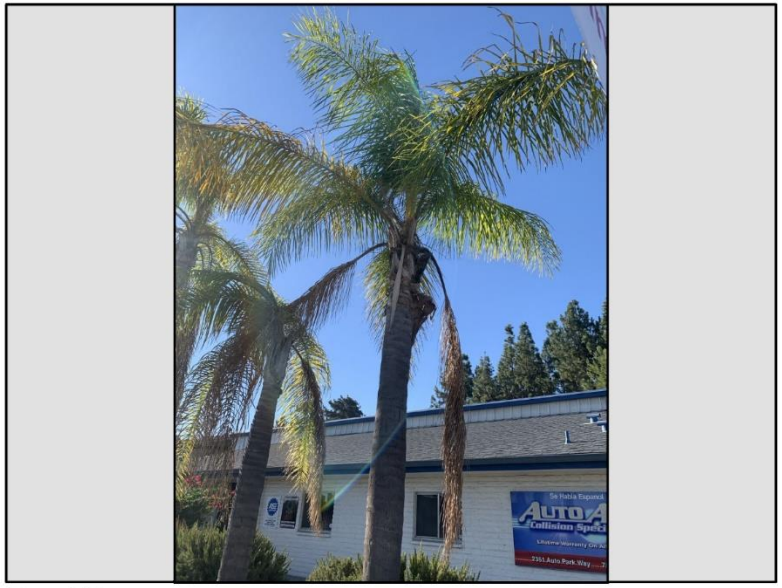

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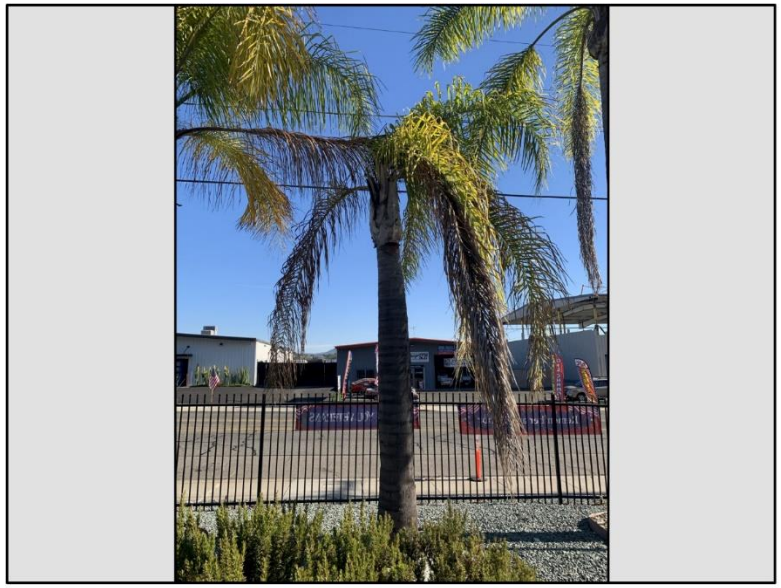

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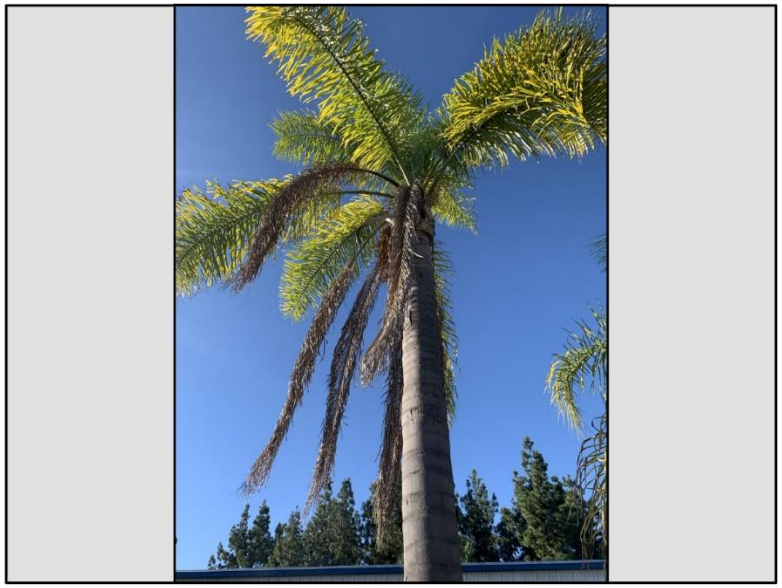


Tree 112

Attachment E

Coastal California Gnatcatcher Protocol Survey Reports (July 7, 2023 and March 1, 2024)

Rincon Consultants, Inc.
8825 Aero Drive
Suite 120
San Diego, California 92123
760-918-9444

July 7, 2023
Project No: 22-13968

Stacey Love
U.S. Fish and Wildlife Service, Carlsbad Office
2177 Salk Avenue #250
Carlsbad, California 92008
Via email: stacey_love@fws.gov

Subject: Coastal California Gnatcatcher Protocol Survey Report
Enterprise BESS Project
Escondido, San Diego County, California

Dear Ms. Love:

Rincon is submitting this letter report summarizing the results of focused surveys for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; CAGN) that were conducted on behalf of Enterprise BESS LLC for the Enterprise BESS Project (Project) at the existing Enterprise Emergency Peaker Plant (EEPP) site in Escondido, California. Specifically, the approximate center of the project is located at latitude 33.121641° N and longitude 117.117768° W (WGS84). **Results of the survey were negative, and no CAGN (individuals, pairs or nests) were observed.**

Enterprise BESS LLC proposes to construct a Battery Energy Storage System (BESS) on the site of the existing EEPP, a nominal 49.5-megawatt (MW) gas-fired power plant licensed by the California Energy Commission (CEC). As such, the BESS project is expected to be required to comply with applicable Conditions of Certification (CoC) included in the CEC permit for the EEPP, including CoC BIO-7 as outlined below, which requires protocol surveys for CAGN prior to onsite work.

BIO-7 *Prior to any site mobilization a FWS approved biologist will conduct protocol surveys of the project site and the construction laydown area for coastal California gnatcatchers.*

Verification: *The designated biologist shall submit a report of the findings to the CPM prior to construction. If California gnatcatchers or other TES species are found the CPM may recommend additional agency consultation.*

Rincon biologist Kelly Rios currently holds an Endangered and Threatened Species Permit issued by the U.S. Fish and Wildlife Service (USFWS), Permit TE 018909-06, under Section 10(a)(1)(A) of the Federal Endangered Species Act. This permit authorizes Ms. Rios to conduct presence/absence surveys for CAGN. The 15-day notification letter of intent to conduct protocol breeding season surveys for CAGN was sent to USFWS March 31, 2023.

Project Location and Environmental Setting

The Project site is located within the EEPP property on Assessor's Parcel Number (APN) 232-410-45-00, located at 201 Enterprise Street in the City of Escondido, California (Figures 1 and 3). The project is located in Township 12 South, Range 2 West and Section 20 (San Bernardino Meridian), within the United States Geological Survey (USGS) Escondido, California 7.5-minute topographic quadrangle (Figure 2).

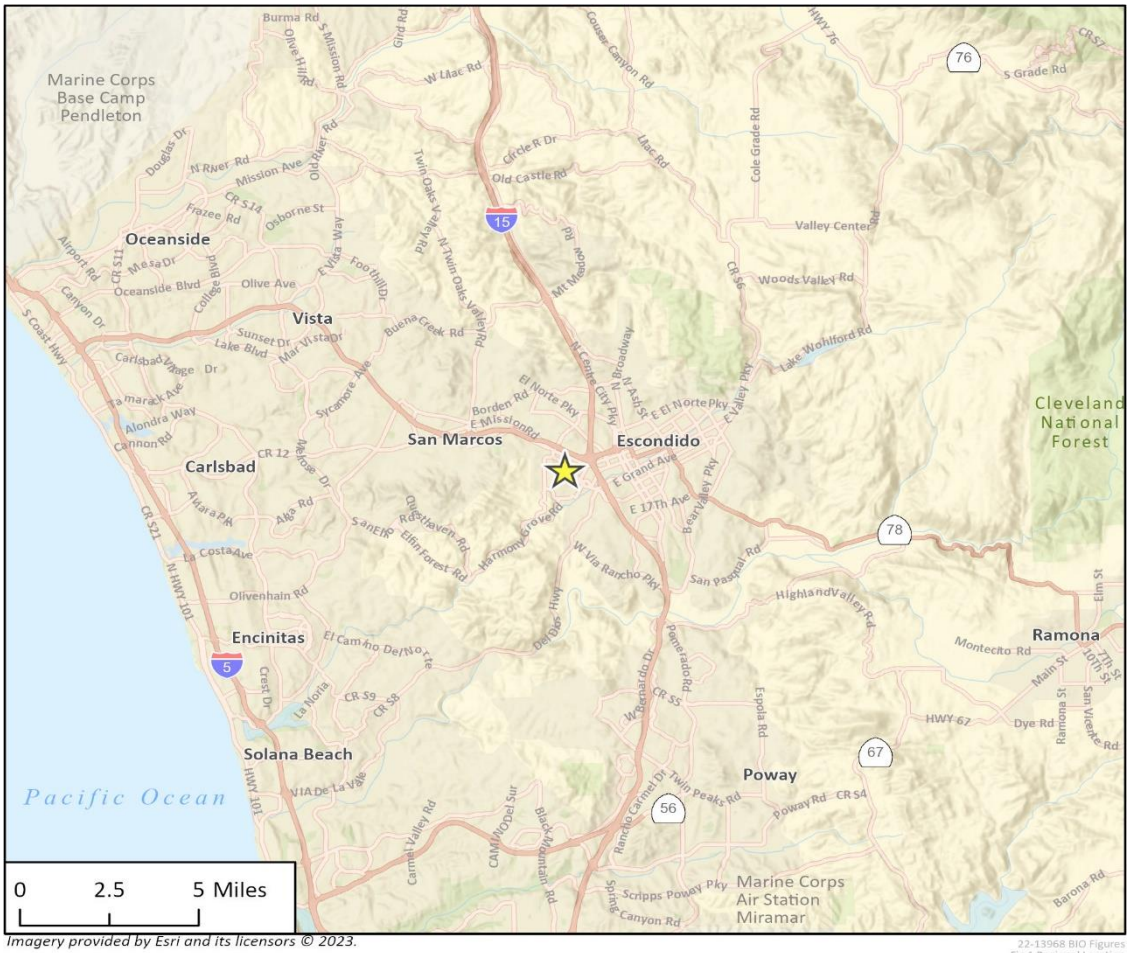
The Project site is bounded on the north by commercial/industrial development, on the east by commercial/industrial development and roadways, to the south by an existing operational SDG&E

substation; and to the west by an SDG&E easement with open habitat consisting of non-native grassland, ornamentals, disturbed and developed areas, and Diegan coastal sage scrub and Citracado Parkway beyond. The Project is located within a generally urbanized area with mixed commercial use, but is bordered by a strip of sage scrub along the western boundary (Figure 3).

The Project area supports marginally suitable habitat for CAGN and additional open space habitat within the study area supports higher quality suitable habitat adjacent to the Project area to the west and southwest, therefore, protocol surveys were recommended by CoC BIO-7 in accordance with USFWS requirements to further evaluate if any CAGN are utilizing the site. Focused CAGN surveys were limited to areas where disturbed Diegan Coastal Sage Scrub (DCSS) and DCSS habitat was mapped as those were the suitable areas encountered. Patches of disturbed Diegan Coastal Sage Scrub are located on the top of slope in southwestern corner of the Project site bounded by razor wire metal fence on the south and west sides. The surveyed habitat also included additional DCSS to the south of the Project boundaries, located within the SDG&E easement area (Figure 3). This vegetation community is structurally similar to DCSS, but has been subjected to historical anthropogenic disturbance from land use practices, most likely resulting from the initial construction of the EEPP building and fence installation. The ground cover between the shrub layer is dominated by non-native and invasive grasses and weeds such as wild oat (*Avena fatua*), mustards (*Brassica* sp.) and bromes (*Bromus* sp.). Dominant shrub species include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), lemonade berry (*Rhus integrifolia*) coyote brush (*Baccharis pilularis*), and deerweed (*Acmispon glaber*), and herbaceous species such as storksbill (*Erodium cicutarium*), Spanish clover (*Acmispon americanus*), willow dock (*Rumex salicifolius*), sandysoil suncup (*Camisonnia strigulosa*), dotseed plantain (*Plantago erecta),* and two-color rabbit tobacco (*Pseudognaphalium biolettii*) observed along the disturbed slope.

The surveys also covered a portion of the non-disturbed DCSS habitat that occurs outside of the Project site to the south and west. DCSS features species such as bush sunflower (*Encelia Californica*), California sagebrush, with coyote brush, deerweed, lemonade berry, and California buckwheat. This community was found to be mixed with non-native grassland species, ornamentals, and other non-native annual and perennial weedy species such as salt cedar (*Tamarix* sp.), thistles, and wild radish (*Raphanus raphanistrum*). Species in this vegetation community were found distributed in higher densities within the open spaced habitat to the west.

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2023.

22-13968 BIO Figures
Fig 1 Regional Location

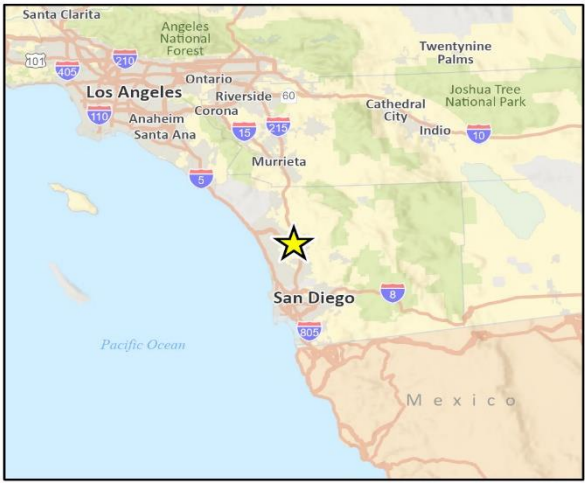
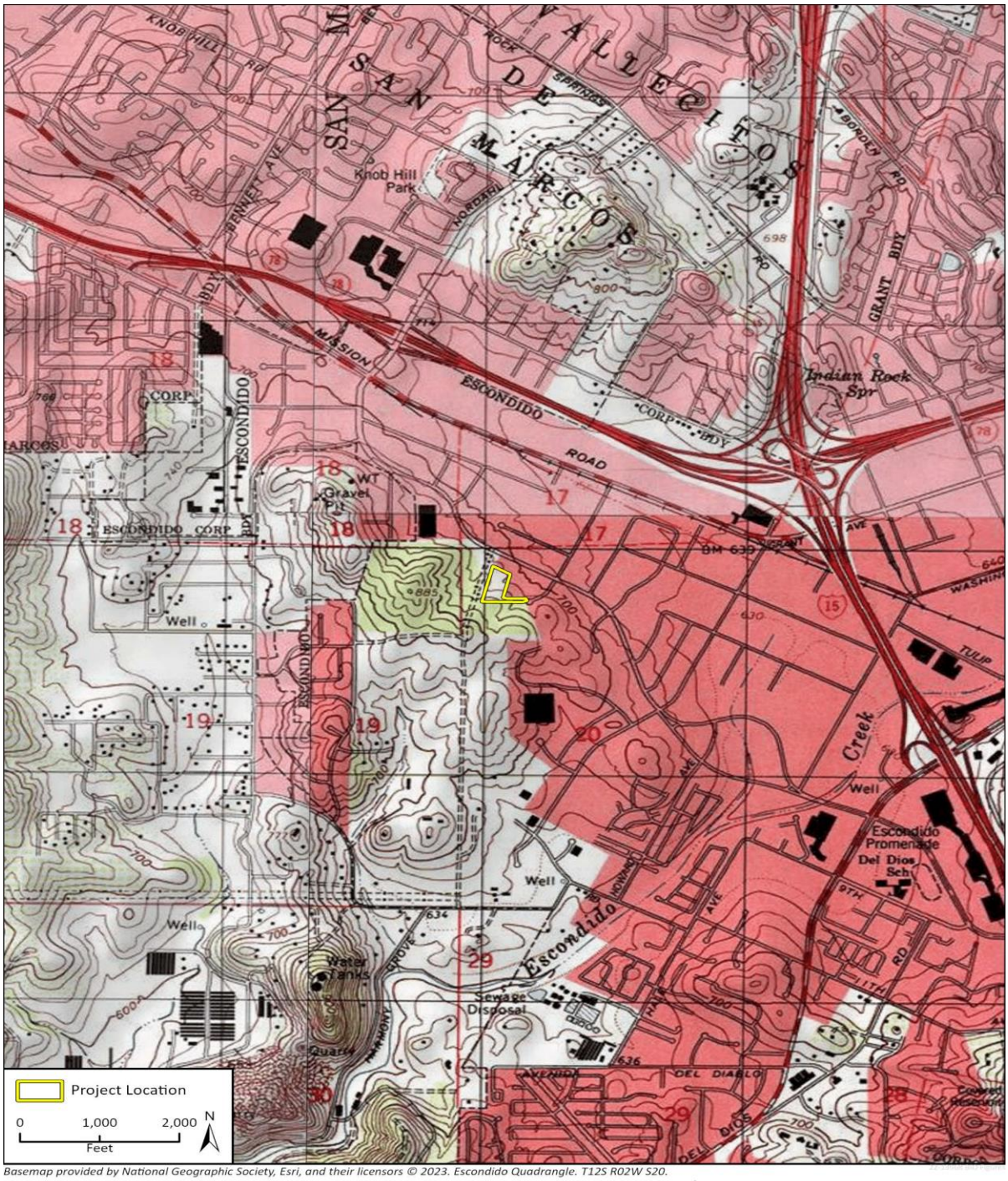
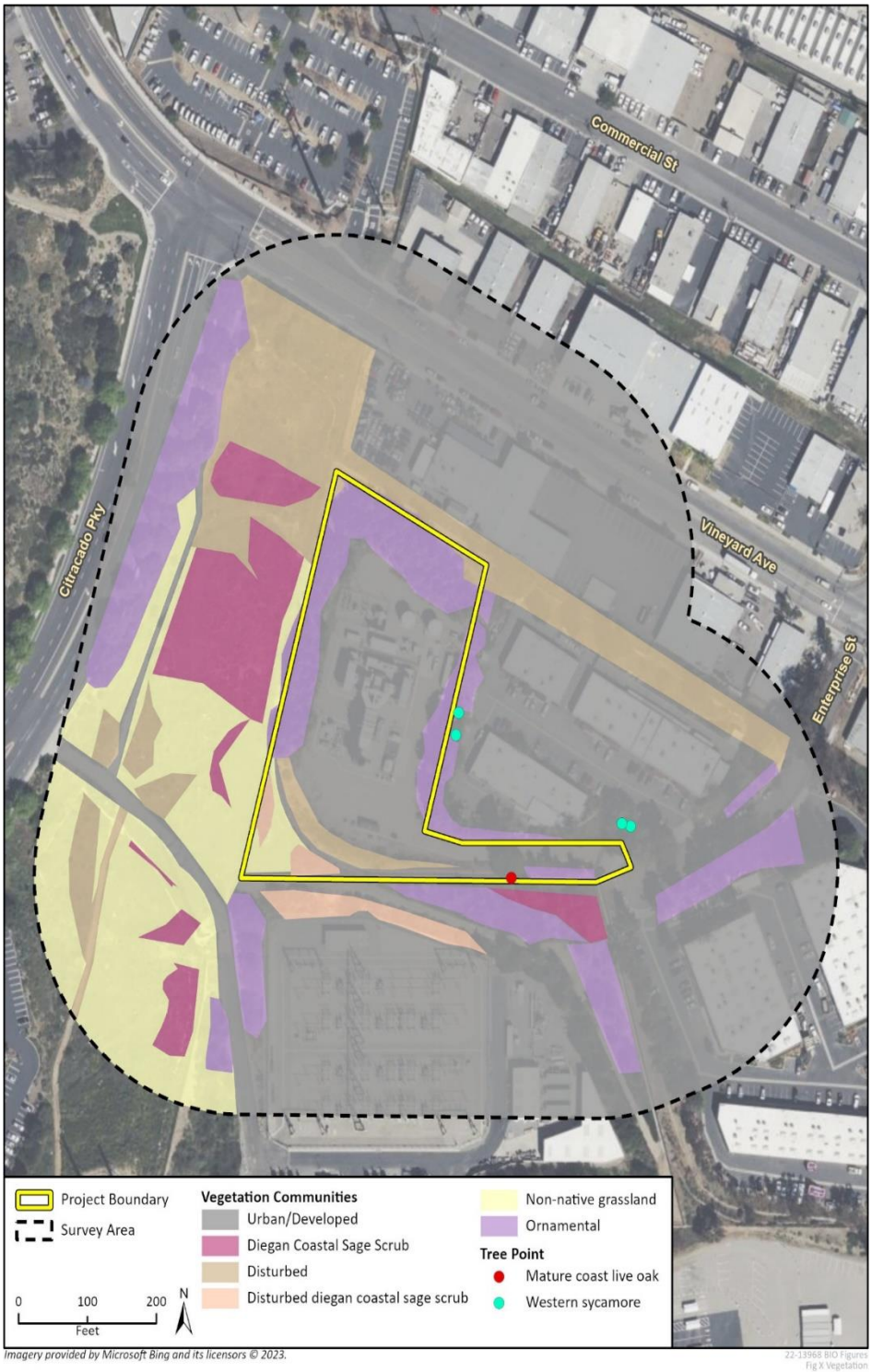


Figure 2 Project Location on USGS 7.5-minute Topographic Quadrangle



Basemap provided by National Geographic Society, Esri, and their licensors © 2023. Escondido Quadrangle. T12S R02W S20.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Figure 3 Project Location and Vegetation Communities and Land Cover within Project Site and Study Area



Species Background

The CAGN is a non-migratory songbird found on the coastal slopes of southern California. It ranges from Ventura County south to northwestern Baja California, Mexico (Atwood et al. 1999; Jones and Ramirez 1995). The CAGN belongs to the old-world warbler and gnatcatcher family, *Sylviidae*. It is a small blue-gray songbird which measures 4.5 inches (11 cm) and weighs 0.2 ounces (6 grams). It has dark blue-gray feathers on its back and grayish-white feathers on its underside. The wings have a brownish wash. Its long tail is mostly black with white outer tail feathers. The species has a thin, small bill. The males have a black cap during the spring and summer which is absent during the winter. Both males and females have a white ring around their eyes.

The breeding season of the CAGN extends from late February through August with the peak of nesting occurring from mid-March through mid-May. The breeding territory size of the CAGN ranges from 2 to 22 acres (1 to 9 hectares), with home ranges expanding up to 39 acres (16 hectares), during the non-breeding season (Bontrager 1991; USFWS 1993). Nest parasitism by brown-headed cowbirds (*Molothrus ater*) has been documented (Unitt 1984). Typically, there is a high rate of nest failure each breeding season. This is offset by rapid and persistent re-nesting efforts; a breeding pair may attempt to nest as many as ten times in a year, producing up to three successful broods in a season (Atwood and Bontrager 2001). There is evidence that this species is also susceptible to nest predation by various animals such as snakes, coyotes (*Canis latrans*), fox, rodents, and other birds, such as California scrub-jays (*Aphelocoma californica*) (Atwood et al. 1999).

The CAGN are strongly associated with coastal sage scrub habitats below 820 feet in coastal areas and between 820 and 1,640 feet in inland areas (Atwood and Bolsinger 1992); however, not all types of coastal sage scrub communities are used or preferred. This species is reported to be most abundant in areas dominated by California sagebrush and California buckwheat. CAGN numbers are generally low in coastal habitats dominated by black sage, white sage (*Salvia apiana*), or lemonade berry; in inland areas, habitats dominated by black sage may be used more regularly (Atwood and Bontrager 2001).

Population estimates for the CAGN vary. Atwood (1992) estimated that 1,811 to 2,291 pairs of CAGN existed in 1992 throughout its range in southern California. In 1996, the USFWS estimated the population in San Diego County at 3,000 pairs, excluding pairs located on sites where habitat loss had already been approved (Atwood and Bontrager 2001). According to a 1999 population estimate in San Diego and other southern California counties, the USFWS estimated the population in San Diego at 1,917 pairs, Orange County at 643 pairs, Los Angeles County at 144 pairs, San Bernardino County at 27 pairs, and Ventura County at 4 pairs (Atwood and Bontrager 2001).

The CAGN is federally listed as threatened and is a California Department of Fish and Wildlife (CDFW) Species of Special Concern. The USFWS listed the CAGN as threatened (USFWS 1993) pursuant to the federal Endangered Species Act of 1973 as amended on March 30, 1993. Critical habitat was designated for CAGN on October 24, 2000 and the designation was revised in 2007 (USFWS 2007). The CAGN is also the City of Escondido's Multiple Habitat Conservation Plan (MHCP) covered species.

The primary cause of this species' decline is the cumulative loss of its coastal sage scrub vegetation community to urban and agricultural development. The USFWS has estimated that coastal sage scrub vegetation has been reduced by 70 to 90 percent of its historical extent (USFWS 1991) and little of what remains is protected in natural open space.

Survey Methodology

Notification to commence protocol surveys was provided via email correspondence to the USFWS on March 31, 2023. Kelly Rios, permitted Rincon biologist (TE-018090-06), conducted all CAGN surveys in accordance with the survey protocol for CAGN surveys within Multi-Habitat Planning Area (MHPA) areas, titled *Section III of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol*, issued February 28, 1997, and revised July 28, 1997. The protocol requires that between March 15 and June 30, a minimum of six surveys shall be conducted at least one week apart to determine presence/absence of CAGN; whenever possible, additional surveys should be conducted. Any deviation from this protocol requires concurrence from the USFWS.

In accordance with the USFWS survey protocol, a minimum of six breeding season surveys were conducted at least one week apart from April 19, 2023 through May 24, 2023 prior to the anticipated construction timeline for the Project. The six surveys occurred between 0800 and 1200 hours each day. Marginally suitable coastal sage scrub habitat occurs to in the southwestern corner of the Project site, with more intact, suitable habitat to the west further southwest of the Project site, consisting of a mix of sage scrub, disturbed sage scrub, non-native grassland, ornamentals, disturbed, and urban/developed vegetation and landcover communities.

A total of approximately one acre was surveyed and did not exceed the maximum of 100 acres per survey day. Surveys were not conducted during periods of excessive or abnormal heat, wind, fog, and other inclement weather. Surveys were conducted with binoculars to aid in bird detection. The surveyor slowly walked the survey area, stopping at approximate 50-foot intervals and used an audio recording of coastal CAGN vocalizations after individuals had been initially located. Recorded CAGN vocalizations were played sparingly and only if other means of detection had failed. If a CAGN was detected before playing recorded vocalizations, the recordings were not played. If CAGN is detected in response to the tape play, use of playback was discontinued immediately. If any CAGN were observed, age, sex, breeding status, and behavioral characteristics were recorded, if possible; the protocol level surveys did not include focused nest searches.

Survey Results

Details on the date, surveyor, time, conditions, and CAGN survey results are provided in Table 1.

Table 1 Coastal California Gnatcatcher Survey Conditions and Results

Date	Surveyor	Survey Conditions	Survey Results
April 19, 2023	Kelly Rios	0800 – 0900 1-2 Winds - mph 0% Cloud Cover 57-58°F	Negative
April 26, 2023	Kelly Rios	0830 – 0930 1-2 Winds - mph 0% Cloud Cover 65-66°F	Negative
May 3, 2023	Kelly Rios	0845-0940 1.2- Winds - mph 100 % Cloud Cover 55-57°F	Negative
May 10, 2023	Kelly Rios	0815-0930 1-2 Winds - mph 100% Cloud Cover	Negative

		57°F	
May 17, 2023	Kelly Rios	0845-0945 1-2 Winds - mph 100 % Cloud Cover 64-65°F	Negative
May 24, 2023	Kelly Rios	0900-1000 1-2 Winds - mph 100 % Cloud Cover 56-57°F	Negative

During the 2023 protocol surveys, no CAGN (individuals, pairs or nests) were observed.

Avian activity levels and diversity were generally moderate during the surveys. Common species expected to occur within coastal sage scrub and adjacent disturbed, ornamental, and habitats were observed on a regular basis. A complete list of avian species detected by sight or sound during the protocol level surveys is included in Table 2.

Table 2 Species Observed during Protocol Level Surveys

Scientific Family, Name	Species
Cathartidae	**New World Vultures**
Cathartes aura	turkey vulture
Accipitridae	**Hawks, Kites, & Eagles**
Buteo jamaicensis	red-tailed hawk
Falconidae	**Falcons**
Falco sparverius	American kestrel
Columbidae	**Pigeons & Doves**
Zenaida macroura	mourning dove
Trochilidae	**Hummingbirds**
Calypte anna	Anna's hummingbird
Selasphorus sasin	Allen's hummingbird
Tyrannidae	**Tyrant Flycatchers**
Sayornis nigricans	black phoebe
Corvidae	**Ravens, Crows, Jays, & Magpies**
Aphelocoma californica	California scrub-jay
Corvus brachyrhynchos	American crow

Scientific Family, Name	Species
Corvus corax	common raven
Troglodytidae	**Wrens**
Thryomanes bewickii	Bewick's wren
Troglodytes aedon	house wren
Timaliidae	**Babblers**
Chamaea fasciata	wrentit
Mimidae	**Mockingbirds & Thrashers**
Mimus polyglottos	Northern mockingbird
Emberizidae	**Emberizids**
Pipilo crissalis	California towhee
Pipilo maculatus	spotted towhee
Fringillidae	**Finches**
Carduelis psaltria	lesser goldfinch
Haemorhous mexicanus	house finch
Spinus lawrencei	Lawrence's goldfinch
Passerellidae	**Sparrows**
Melospiza melodia	song sparrow
Parulidae	**New World Warblers**
Geothlypis trichas	common yellowthroat
Aegithalidae	**Bushtits**
Psaltriparus minimus	bushtit
Apodidae	**Swifts**
Aeronautes saxatalis	white-throated swift
Sturnidae	**Starlings, Myna**
Sturnus vulgaris	European starling

Conclusions

During the 2023 CAGN protocol surveys, no CAGN (individuals, pairs or nests) were observed during the six protocol surveys from April 19, 2023 through May 24, 2023.

Certification

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

Sincerely,

Kelly Rios, TE 018909-06
Permitted Biologist

Priya Pratap
Project Manager/Senior Biologist

Jacob Hargis
Biologist

References

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USFWS. 2007. Federal Register, Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Coastal California Gnatcatcher (*Polioptila californica californica*); Final Rule. December 19.

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760-918-9444

March 1, 2024
Project No: 22-13968

Stacey Love
U.S. Fish and Wildlife Service, Carlsbad Office
2177 Salk Avenue #250
Carlsbad, California 92008
Via email: stacey_love@fws.gov

Subject: Coastal California Gnatcatcher Protocol Survey Report
Enterprise BESS Project
Escondido, San Diego County, California

Dear Ms. Love:

Rincon is submitting this letter report summarizing the results of focused surveys for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; CAGN) that were conducted on behalf of Enterprise BESS LLC for the Enterprise BESS Project (Project) at the Enterprise Emergency Peaker Plant (EEPP) site in Escondido, California. Specifically, the approximate center of the Project is located at latitude 33.121641° N and longitude 117.117768° W (WGS84). **Results of the survey were negative, and no CAGN (individuals, pairs, or nests) were observed.**

Enterprise BESS LLC proposes to construct a Battery Energy Storage System (BESS) on the site of the existing EEPP, a nominal 49.5-megawatt (MW) gas-fired power plant licensed by the California Energy Commission (CEC). As such, the BESS project is expected to be required to comply with applicable Conditions of Certification (CoC) included in the CEC permit for the EEPP, including CoC BIO-7 as outlined below, which requires protocol surveys for CAGN prior to onsite work.

BIO-7 *Prior to any site mobilization a FWS approved biologist will conduct protocol surveys of the project site and the construction laydown area for coastal California gnatcatchers.*

Verification: *The designated biologist shall submit a report of the findings to the [Compliance Project Manager] prior to construction. If California gnatcatchers or other [Threatened and Endangered] species are found the [Compliance Project Manager] may recommend additional agency consultation.*

Rincon biologist Kelly Rios currently holds an Endangered and Threatened Species Permit issued by the U.S. Fish and Wildlife Service (USFWS), Permit TE 018909-06, under Section 10(a)(1)(A) of the Endangered Species Act. This permit authorizes Ms. Rios to conduct presence/absence surveys for CAGN. The 15-day notification letter of intent to conduct protocol non-breeding season surveys for CAGN was sent to USFWS October 2, 2023 and no response was received.

Project Location and Environmental Setting

The Project boundary area is located within the EEPP property on Assessor's Parcel Numbers (APN) 232-410-45-00 and 232-590-13-00, located at 201 Enterprise Street in the City of Escondido, California (Figures 1 and 3). The Project will be co-located with the existing CalPeak Power EEPP. The Project is located in Township 12 South, Range 2 West and Section 20 (San Bernardino Meridian), within the United States Geological Survey (USGS) *Escondido, California* 7.5-minute topographic quadrangle (Figure 2). The Project boundary area is defined as the Project components and limits of

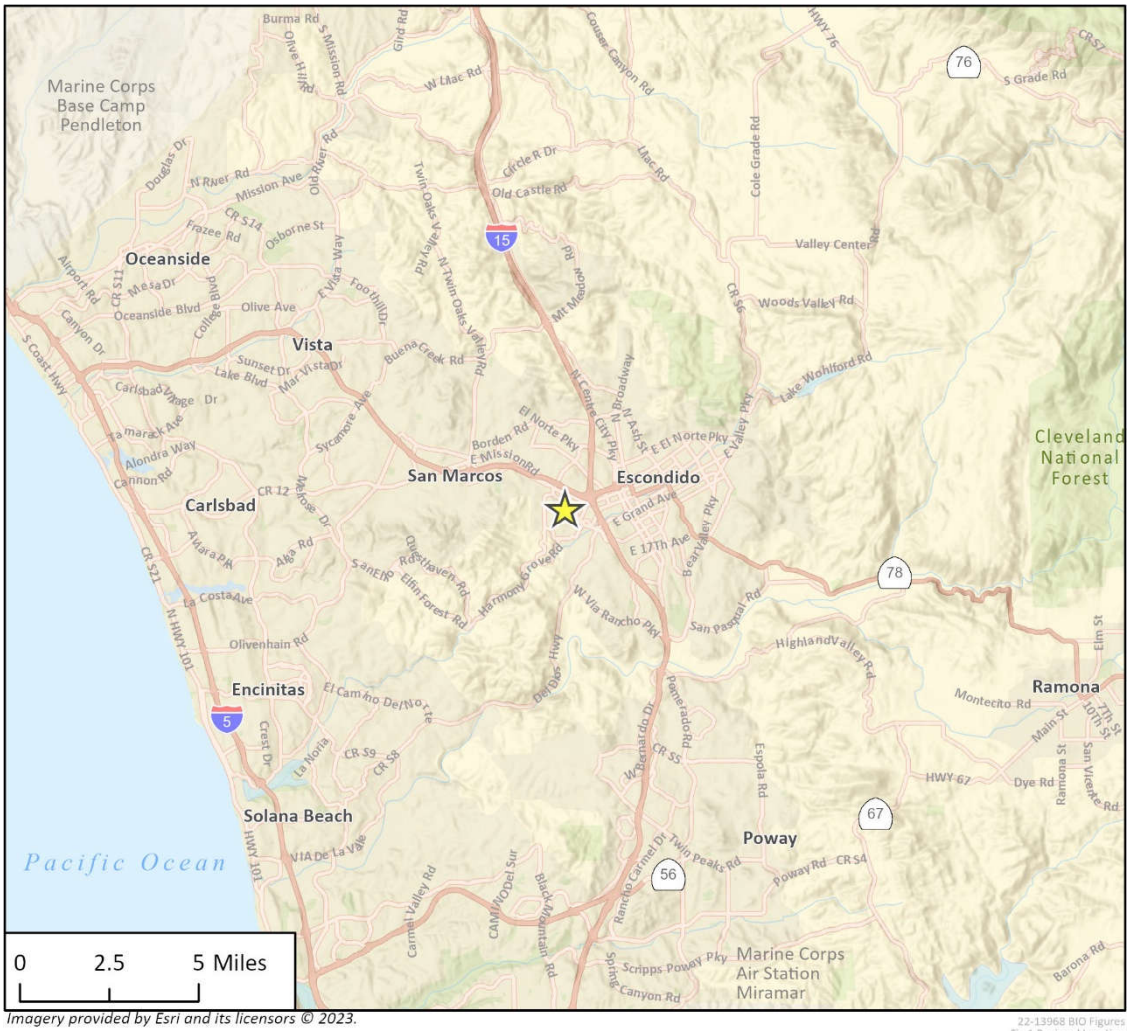
disturbance and the Study Area is defined as the Project boundary area plus an additional environmental investigation area. The 300-foot Buffer Area was evaluated and includes the Project boundary area and Study Area.

The Project boundary area is bordered to the north by Auto Art Paint & Body, and beyond to Auto Park Way, to the east and southeast by Enterprise Industrial Park commercial development, to the south by the SDG&E Palomar Energy Center Substation, and to the west by an SDG&E easement with open habitat consisting of non-native grassland, ornamentals, disturbed and developed areas, and Diegan Coastal Sage Scrub and Citracado Parkway beyond. The Project is located within a generally urbanized area with mixed commercial use but is bordered by a strip of disturbed Diegan Coastal Sage Scrub along the western boundary (Figure 3).

The Project boundary area supports marginally suitable and highly suitable habitat for CAGN and additional open space habitat within the Study Area, therefore, protocol surveys were required by CoC BIO-7 in accordance with USFWS requirements to further evaluate if any CAGN are utilizing the site. Focused CAGN surveys were limited to areas where disturbed Diegan Coastal Sage Scrub (DCSS) and DCSS habitat was mapped as those were the suitable areas encountered. Patches of disturbed DCSS are located on the top of slope in the southern portion of the Study Area and the 300-foot Buffer Area (Figure 3). This vegetation community is structurally similar to DCSS but has been subjected to historical anthropogenic disturbance from land use practices, most likely resulting from the initial construction of the EEPP building and fence installation. The ground cover between the shrub layer is dominated by non-native and invasive grasses and weeds such as wild oat (*Avena fatua*), mustards (*Brassica* sp.) and bromes (*Bromus* sp.). Dominant native shrub species include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), lemonade berry (*Rhus integrifolia*) coyote brush (*Baccharis pilularis*), and deerweed (*Acmispon glaber*), and herbaceous species such as storksbill (*Erodium cicutarium*), Spanish clover (*Acmispon americanus*), willow dock (*Rumex salicifolius*), sandysoil suncup (*Camisonnia strigulosa*), dotseed plantain (*Plantago erecta),* and two-color rabbit tobacco (*Pseudognaphalium biolettii*) observed along the disturbed slope.

The surveys also covered a portion of the non-disturbed DCSS habitat that occurs within the western portion of the Study Area. DCSS features species such as bush sunflower (*Encelia Californica*), California sagebrush, with coyote brush, deerweed, lemonade berry, and California buckwheat. This community was found to be mixed with non-native grassland species, ornamentals, and other non-native annual and perennial weedy species such as salt cedar (*Tamarix* sp.), thistles, and wild radish (*Raphanus raphanistrum*). Species in this vegetation community were found distributed in higher densities within the open spaced habitat in the western portion of the Study Area.

Figure 1 Regional Project Location



Project Location

N

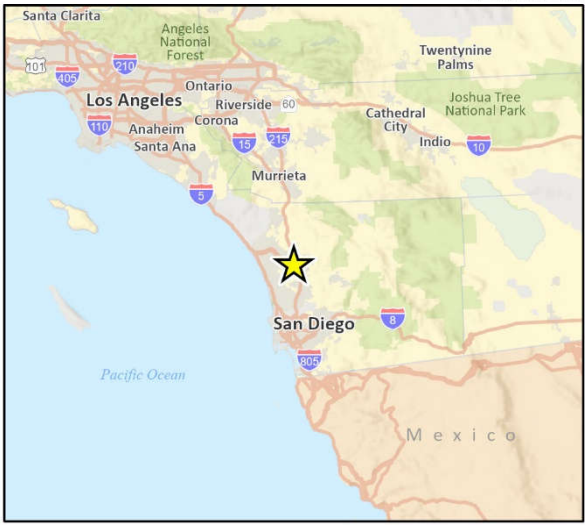
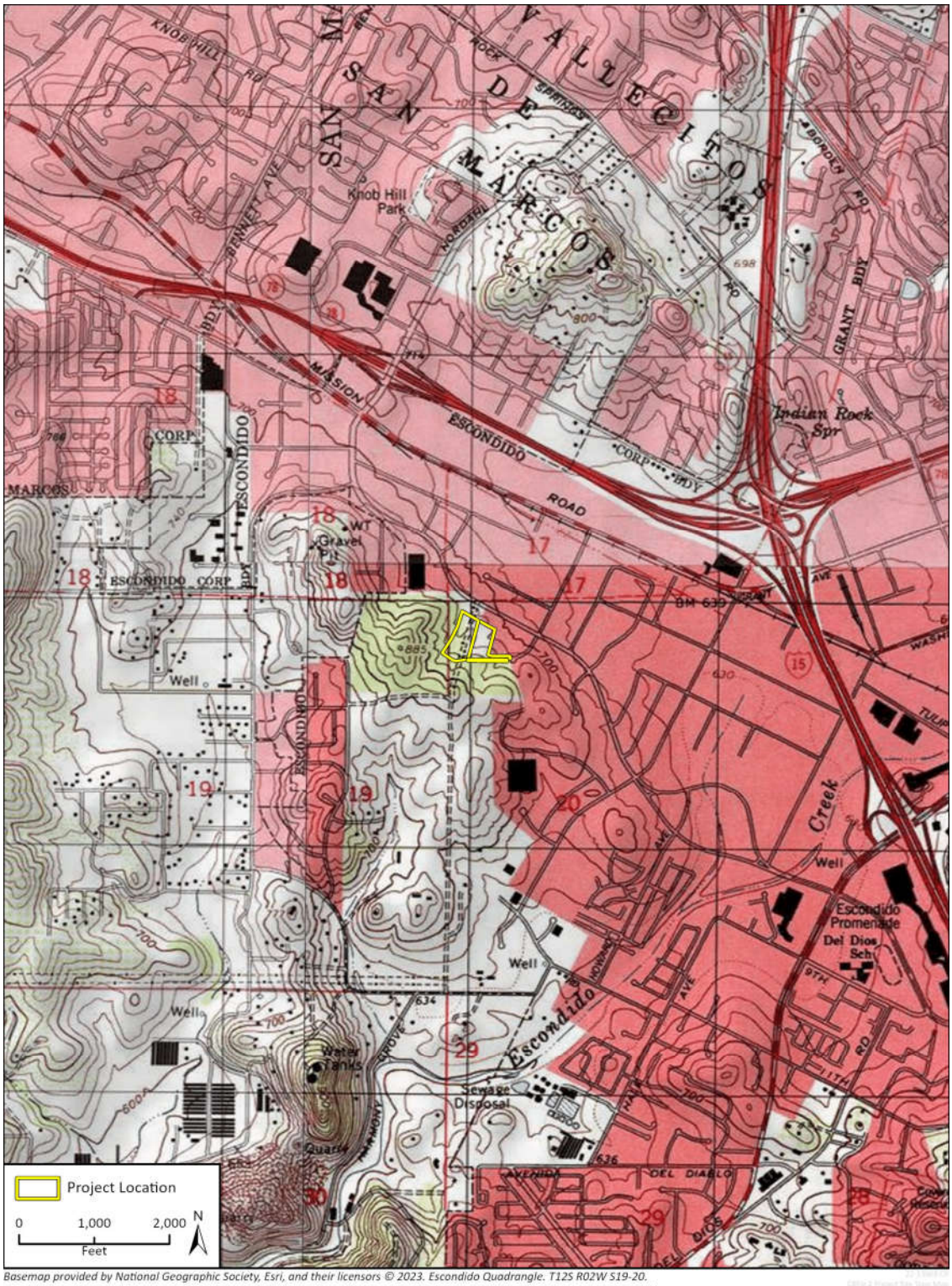
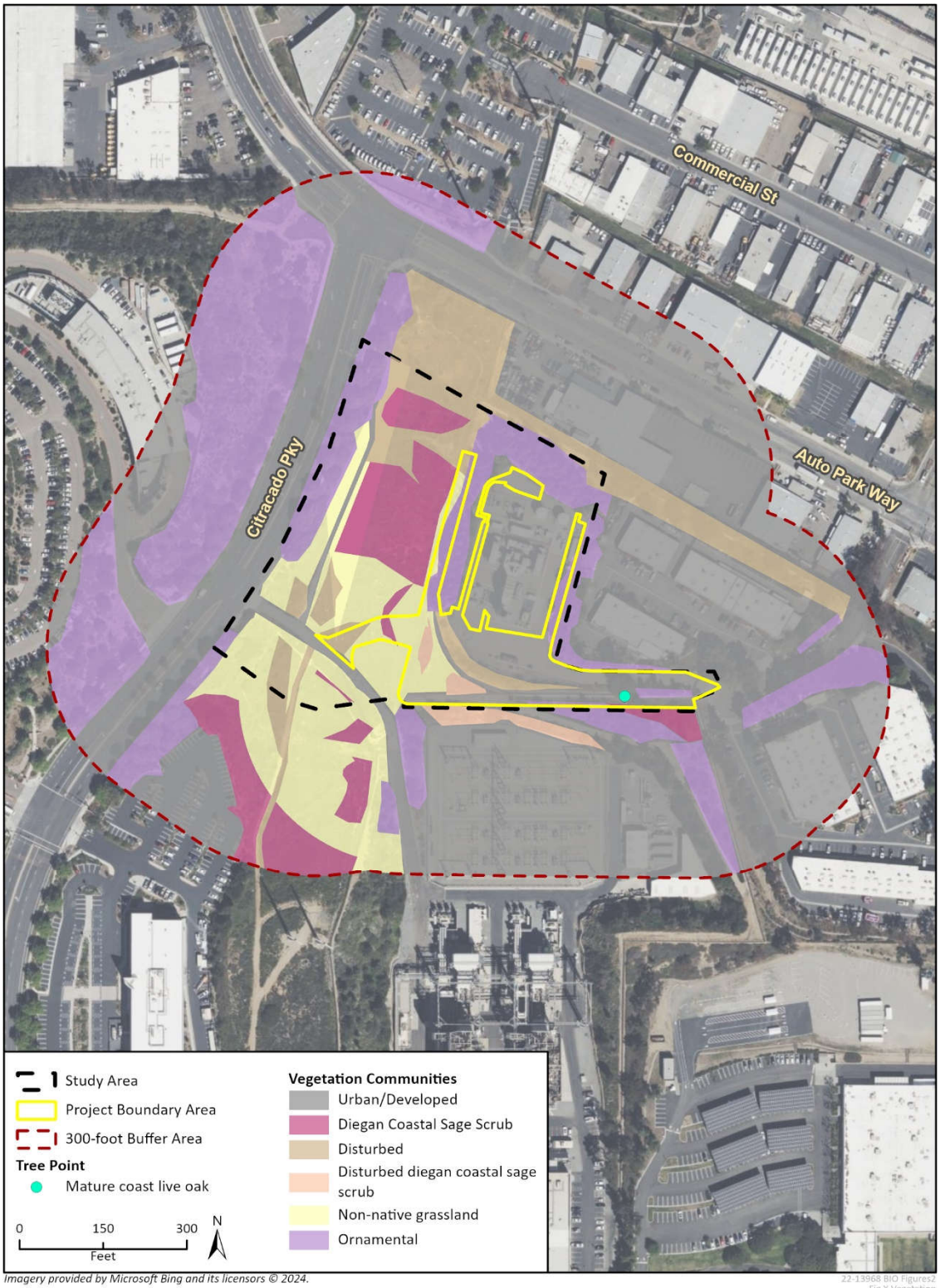


Figure 2 Project Location on USGS 7.5-minute Topographic Quadrangle



Basemap provided by National Geographic Society, Esri, and their licensors © 2023. Escondido Quadrangle. T12S R02W S19-20.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Figure 3 Vegetation Communities and Land Cover within Project Boundary Area and Study Area



Species Background

The CAGN is a non-migratory songbird found on the coastal slopes of southern California. It ranges from Ventura County south to northwestern Baja California, Mexico (Atwood et al. 1999; Jones and Ramirez 1995). The CAGN belongs to the old-world warbler and gnatcatcher family, *Sylviidae*. It is a small blue-gray songbird which measures 4.5 inches (11 cm) and weighs 0.2 ounces (6 grams). It has dark blue-gray feathers on its back and grayish-white feathers on its underside. The wings have a brownish wash. Its long tail is mostly black with white outer tail feathers. The species has a thin, small bill. The males have a black cap during the spring and summer which is absent during the winter. Both males and females have a white ring around their eyes.

The breeding season of the CAGN extends from late February through August with the peak of nesting occurring from mid-March through mid-May. The breeding territory size of the CAGN ranges from 2 to 22 acres (1 to 9 hectares), with home ranges expanding up to 39 acres (16 hectares), during the non-breeding season (Bontrager 1991; USFWS 1993). Nest parasitism by brown-headed cowbirds (*Molothrus ater*) has been documented (Unitt 1984). Typically, there is a high rate of nest failure each breeding season. This is offset by rapid and persistent re-nesting efforts; a breeding pair may attempt to nest as many as ten times in a year, producing up to three successful broods in a season (Atwood and Bontrager 2001). There is evidence that this species is also susceptible to nest predation by various animals such as snakes, coyotes (*Canis latrans*), fox, rodents, and other birds, such as California scrub-jays (*Aphelocoma californica*) (Atwood et al. 1999).

The CAGN are strongly associated with coastal sage scrub habitats below 820 feet in coastal areas and between 820 and 1,640 feet in inland areas (Atwood and Bolsinger 1992); however, not all types of coastal sage scrub communities are used or preferred. This species is reported to be most abundant in areas dominated by California sagebrush and California buckwheat. CAGN numbers are generally low in coastal habitats dominated by black sage, white sage (*Salvia apiana*), or lemonade berry; in inland areas, habitats dominated by black sage may be used more regularly (Atwood and Bontrager 2001).

Population estimates for the CAGN vary. Atwood (1992) estimated that 1,811 to 2,291 pairs of CAGN existed in 1992 throughout its range in southern California. In 1996, the USFWS estimated the population in San Diego County at 3,000 pairs, excluding pairs located on sites where habitat loss had already been approved (Atwood and Bontrager 2001). According to a 1999 population estimate in San Diego and other southern California counties, the USFWS estimated the population in San Diego at 1,917 pairs, Orange County at 643 pairs, Los Angeles County at 144 pairs, San Bernardino County at 27 pairs, and Ventura County at 4 pairs (Atwood and Bontrager 2001).

The CAGN is federally listed as threatened and is a California Department of Fish and Wildlife (CDFW) Species of Special Concern. The USFWS listed the CAGN as threatened (USFWS 1993) pursuant to the federal Endangered Species Act of 1973 as amended on March 30, 1993. Critical habitat was designated for CAGN on October 24, 2000, and the designation was revised in 2007 (USFWS 2007). The CAGN is also the City of Escondido's Multiple Habitat Conservation Plan (MHCP) covered species.

The primary cause of this species' decline is the cumulative loss of its coastal sage scrub vegetation community to urban and agricultural development. The USFWS has estimated that coastal sage scrub vegetation has been reduced by 70 to 90 percent of its historical extent (USFWS 1991) and little of what remains is protected in natural open space.

Survey Methodology

Notification to commence protocol non-breeding season surveys was provided via email correspondence to the USFWS on October 2, 2023. Kelly Rios, permitted Rincon biologist (TE-018090-06), conducted all CAGN surveys in accordance with the survey protocol for CAGN surveys within Multi-Habitat Planning Area (MHPA) areas, titled *Section III of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol*, issued February 28, 1997, and revised July 28, 1997. The protocol requires that between July 1 through March 14, a minimum of nine surveys shall be conducted at least two weeks apart to determine presence/absence of CAGN; whenever possible, additional surveys should be conducted.

In accordance with the USFWS survey protocol, nine non-breeding season surveys were conducted at least two weeks apart from October 17, 2023, through February 13, 2024, prior to the anticipated construction timeline for the Project. The nine surveys occurred between 0800 and 1200 hours each day. Marginally suitable coastal sage scrub habitat occurs in the southwestern corner of the Project site, with more intact, suitable habitat within the western portion of the Project site, consisting of a mix of sage scrub, disturbed sage scrub, non-native grassland, ornamentals, disturbed, and urban/developed vegetation and landcover communities.

A total of approximately one acre was surveyed and did not exceed the maximum of 100 acres per survey day. Surveys were not conducted during periods of excessive or abnormal heat, wind, fog, and other inclement weather. Surveys were conducted with binoculars to aid in bird detection. The surveyor slowly walked the survey area, stopping at approximate 50-foot intervals and used an audio recording of coastal CAGN vocalizations after individuals had been initially located. Recorded CAGN vocalizations were played sparingly and only if other means of detection had failed. If a CAGN was detected before playing recorded vocalizations, the recordings were not played. If CAGN is detected in response to the tape play, use of playback was discontinued immediately. If any CAGN were observed, age, sex, breeding status, and behavioral characteristics were recorded, if possible; the protocol level surveys did not include focused nest searches.

Survey Results

Details on the date, surveyor, time, conditions, and CAGN survey results are provided in Table 1.

Table 1 Coastal California Gnatcatcher Survey Conditions and Results

Date	Surveyor	Survey Conditions	Survey Results
October 17, 2023	Kelly Rios	0915-1120 2-3 Winds - mph 60% Cloud Cover 74-72°F	Negative
October 31, 2023	Kelly Rios	0900-1130 2-3 Winds - mph 0% Cloud Cover 75-82°F	Negative
November 14, 2023	Kelly Rios	800-1040 1.2- Winds - mph 0 % Cloud Cover 64-66°F	Negative

November 28, 2023	Kelly Rios	0800-1000 1-2 Winds - mph 0% Cloud Cover 58-61°F	Negative
December 12, 2023	Kelly Rios	0830-1030 1-2 Winds - mph 0 % Cloud Cover 59-62°F	Negative
January 2, 2024	Kelly Rios	0830-1100 1-2 Winds - mph 0 % Cloud Cover 55-64°F	Negative
January 16, 2024	Kelly Rios	0845-1100 1-2 Winds - mph 0 % Cloud Cover 57-61°F	Negative
January 30, 2024	Kelly Rios	0915-1150 1-2 Winds - mph 0 % Cloud Cover 67-72°F	Negative
February 13, 2024	Kelly Rios	0900-1120 1-2 Winds - mph 10 % Cloud Cover 57-67°F	Negative

During the 2023-2024 protocol non-breeding season surveys, no CAGN (individuals, pairs, or nests) were observed.

Avian activity levels and diversity were generally moderate during the surveys. Common species expected to occur within coastal sage scrub and adjacent disturbed, ornamental, and habitats were observed on a regular basis. A complete list of avian species detected by sight or sound during the protocol level surveys is included in Table 2.

Table 2 Species Observed during Protocol Level Surveys

Scientific Family, Name	Species
Accipitridae	**Hawks, Kites, & Eagles**
Buteo jamaicensis	red-tailed hawk
Columbidae	**Pigeons & Doves**
Zenaida macroura	mourning dove
Trochilidae	**Hummingbirds**
Calypte anna	Anna's hummingbird
Tyrannidae	**Tyrant Flycatchers**
Sayornis nigricans	black phoebe

Scientific Family, Name	Species
Corvidae	**Ravens, Crows, Jays, & Magpies**
Aphelocoma californica	California scrub-jay
Corvus brachyrhynchos	American crow
Corvus corax	common raven
Troglodytidae	**Wrens**
Thryomanes bewickii	Bewick's wren
Troglodytes aedon	house wren
Timaliidae	**Babblers**
Chamaea fasciata	wrentit
Stitidae	**Nuthatches**
Sitta canadensis	red-breasted nuthatch
Mimidae	**Mockingbirds & Thrashers**
Mimus polyglottos	Northern mockingbird
Emberizidae	**Emberizids**
Pipilo crissalis	California towhee
Pipilo maculatus	spotted towhee
Fringillidae	**Finches**
Carduelis psaltria	lesser goldfinch
Haemorhous mexicanus	house finch
Spinus lawrencei	Lawrence's goldfinch
Passerellidae	**Sparrows**
Melospiza melodia	song sparrow
Parulidae	**New World Warblers**
Geothlypis trichas	common yellowthroat
Aegithalidae	**Bushtits**
Psaltriparus minimus	bushtit

Scientific Family, Name	Species
Apodidae	**Swifts**
Aeronautes saxatalis	white-throated swift
Sturnidae	**Starlings, Myna**
Sturnus vulgaris	European starling

Conclusions

During the 2023-2024 CAGN protocol non-breeding season surveys, no CAGN (individuals, pairs or nests) were observed during the nine protocol surveys from October 17, 2023 through February 13, 2024.

Certification

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

Sincerely,
Rincon Consultants, Inc.

Kelly Rios, TE 018909-06
Permitted Biologist

Grace Myers
Biologist

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Attachment F

Special-Status Species Evaluation Tables

Special-Status Plant and Lichen Species in the Regional Vicinity (Nine Quadrangles) of the Survey Area

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Plants and Lichens				
Abronia maritima red sand-verbena	None/None G4/S3? 4.2	Perennial herb. Coastal dunes. Dune plant. Elevations: 0-330 ft. (0-100 m.) Blooms Feb-Nov.	Not Expected	The Survey Area is located outside the elevation range of the species.
Acanthomintha ilicifolia San Diego thorn-mint	FT/SE G1/S1 1B.1	Annual herb. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Clay, openings. Elevations: 35-3150 ft. (10-960 m.) Blooms Apr-Jun.	Not Expected	No suitable habitat or associated soils occur within the Survey Area.
Acmispon prostratus Nuttall's acmispon	None/None G1G2/S1 1B.1	Annual herb. Coastal dunes, coastal scrub. On sand dunes. Elevations: 0-35 ft. (0-10 m.) Blooms Mar-Jun (Jul).	Not Expected	The Survey Area is located outside the elevation range of the species.
Adolphia californica California adolphia	None/None G3/S2 2B.1	Perennial deciduous shrub. Chaparral, coastal scrub, valley and foothill grassland. Clay. Elevations: 35-2430 ft. (10-740 m.) Blooms Dec-May.	Not Expected	This conspicuous shrub species was not observed during any of the surveys and the species' associated soils are not present within the Survey Area.
Agave shawii var. *shawii* Shaw's agave	None/None G2G3T2T3/S1 2B.1	Perennial leaf. Coastal bluff scrub, coastal scrub. Coastal bluffs and slopes within coastal sage scrub. Elevations: 10-395 ft. (3-120 m.) Blooms Sep-May.	Not Expected	The Survey Area is located outside the elevation range of the species.
Allium marvinii Yucaipa onion	None/None G1/S1 1B.2	Perennial bulbiferous herb. Chaparral. In openings on clay soils. Elevations: 2495-3495 ft. (760-1065 m.) Blooms Apr-May.	Not Expected	No suitable habitat or associated soils occur within the Survey Area. Additionally, the Survey Area is located outside the elevation range of the species.
Ambrosia pumila San Diego ambrosia	FE/None G1/S1 1B.1	Perennial rhizomatous herb. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Alkaline (sometimes), clay (sometimes), disturbed areas (often), sandy (sometimes). Elevations: 65-1360 ft. (20-415 m.) Blooms Apr-Oct.	Low Potential	Disturbances within and adjacent to the Survey Area have been substantial and prolonged, leading to the dominance of non-native herbaceous annuals in the understory of the Disturbed Habitat and within openings in the Diegan Coastal Sage Scrub. While marginal habitat for this species exists, observations within five miles of the Survey Area are primarily associated with conserved lands that experience lower levels of disturbance.
Aphanisma blitoides aphanisma	None/None G3G4/S2 1B.2	Annual herb. Coastal bluff scrub, coastal dunes, coastal scrub. Gravelly (sometimes), sandy (sometimes). Elevations: 5-1000 ft. (1-305 m.) Blooms Feb-Jun.	Not Expected	The associated habitat for this species is absent within the Survey Area. This species is typically found within coastal regions; no CNDDB occurrences have been recorded within a 5-mile radius.
Aphyllon parishii ssp. *brachylobum* short-lobed broomrape	None/None G4?T4/S3 4.2	Coastal bluff scrub, Coastal dunes, Coastal scrub. Sandy 3-305 m. Blooms Apr-Oct.	Not Expected	The species' associated habitat is not present in the Survey Area. The species is typically found near the coast. No observations have occurred within five miles of the Survey Area.
Arctostaphylos glandulosa ssp. *crassifolia* Del Mar manzanita	FE/None G5T2/S2 1B.1	Perennial evergreen shrub. Chaparral. Sandy coastal mesas and ocean bluffs; in chaparral or Torrey pine forest. Elevations: 0-1200 ft. (0-365 m.) Blooms Jun-Apr.	Not Expected	The species' associated habitat is not present in the Survey Area. This conspicuous shrub species was not observed during field survey.
Arctostaphylos rainbowensis Rainbow manzanita	None/None G2/S2 1B.1	Perennial evergreen shrub. Chaparral. Usually found in gabbro chaparral. Elevations: 675-2200 ft. (205-670 m.) Blooms Dec-Mar.	Not Expected	The species' associated habitat is not present in the Survey Area. This conspicuous shrub species was not observed during field survey.
Artemisia palmeri San Diego sagewort	None/None G3?/S3? 4.2	Perennial deciduous shrub. Chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland. Mesic, sandy. Elevations: 50-3000 ft. (15-915 m.) Blooms (Feb) May-Sep.	Not Expected	While marginal suitable habitat present within the Survey Area this species was not observed during the field survey.
Asplenium vespertinum western spleenwort	None/None G3?/S4 4.2	Perennial rhizomatous herb. Chaparral, cismontane woodland, coastal scrub. Rocky. Elevations: 590-3280 ft. (180-1000 m.) Blooms Feb-Jun.	Not Expected	The species' associated habitat is not present in the Survey Area. The site lacks rocky topography.
Astragalus oocarpus San Diego milk-vetch	None/None G2?/S2? 1B.2	Perennial herb. Chaparral, cismontane woodland. Openings in chaparral or on gravelly flats and slopes in thin oak woodland. Elevations: 1000-5000 ft. (305-1524 m.) Blooms May-Aug.	Not Expected	The species' associated topography is not present in the Survey Area.
Astragalus tener var. *titi* coastal dunes milk-vetch	FE/SE G2T1/S1 1B.1	Annual herb. Coastal bluff scrub, coastal dunes, coastal prairie. Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean; one site on a clay terrace. Elevations: 5-165 ft. (1-50 m.) Blooms Mar-May.	Not Expected	The Survey Area is outside of elevation range for this species. The species' associated habitat is not present in the Survey Area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Atriplex coulteri Coulter's saltbush	None/None G3/S2 1B.2	Perennial herb. Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Alkaline (sometimes), clay (sometimes). Elevations: 10-1510 ft. (3-460 m.) Blooms Mar-Oct.	Not Expected	The species' associated topography is not present in the Survey Area.
Atriplex pacifica south coast saltscale	None/None G4/S2 1B.2	Annual herb. Coastal bluff scrub, coastal dunes, coastal scrub, playas. Alkali soils. Elevations: 0-460 ft. (0-140 m.) Blooms Mar-Oct.	Not Expected	The Survey Area is outside of elevation range for this species. The species' associated habitat is not present in the Survey Area.
Atriplex parishii Parish's brittlescale	None/None G1G2/S1 1B.1	Annual herb. Chenopod scrub, playas, vernal pools. Alkaline. Elevations: 80-6235 ft. (25-1900 m.) Blooms Jun-Oct.	Not Expected	Vernal pools are not present within the Survey Area.
Baccharis vanessae Encinitas baccharis	FT/SE G1/S1 1B.1	Perennial deciduous shrub. Chaparral, cismontane woodland. Sandstone. Elevations: 195-2360 ft. (60-720 m.) Blooms Aug-Nov.	Not Expected	This conspicuous shrub species was not observed during the field surveys. The species does have recorded observations within five miles of the Survey Area.
Bahiopsis laciniata San Diego County viguiera	None/None G4/S4 4.3	Chaparral, Coastal scrub. Slopes and ridges. 60-750 m. Blooms Feb-Jun (Aug).	Not Expected	The species' associated habitat is not present in the Survey Area.
Bergerocactus emoryi golden-spined cereus	None/None G2G3/S2 2B.2	Perennial stem. Chaparral, closed-cone coniferous forest, coastal scrub. Sandy. Elevations: 10-1295 ft. (3-395 m.) Blooms May-Jun.	Not Expected	The species' associated habitat is not present in the Survey Area.
Bloomeria clevelandii San Diego goldenstar	None/None G2G3/S3 1B.1	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Clay. Elevations: 165-1525 ft. (50-465 m.) Blooms Apr-May.	Not Expected	The species' associated habitat is not present in the Survey Area.
Brodiaea filifolia thread-leaved brodiaea	FT/SE G2/S2 1B.1	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, playas, valley and foothill grassland, vernal pools. Clay (often). Elevations: 80-3675 ft. (25-1120 m.) Blooms Mar-Jun.	Not Expected	The species' associated habitat is not present in the Survey Area.
Brodiaea orcuttii Orcutt's brodiaea	None/None G2/S2 1B.1	Perennial bulbiferous herb. Chaparral, cismontane woodland, closed-cone coniferous forest, meadows and seeps, valley and foothill grassland, vernal pools. Clay, Mesic. Elevations: 100-5550 ft. (30-1692 m.) Blooms May-Jul.	Not Expected	The species' associated habitat is not present in the Survey Area.
Calandrinia breweri Brewer's calandrinia	None/None G4/S4 4.2	Annual herb. Chaparral, coastal scrub. Burned areas, disturbed areas, loam (sometimes), sandy (sometimes). Elevations: 35-4005 ft. (10-1220 m.) Blooms (Jan) Mar-Jun.	Low Potential	Some marginally suitable disturbed and sandy loam habitat is present within the Survey Area. This species was not observed during the field survey.
Calochortus plummerae Plummer's mariposa-lily	None/None G4/S4 4.2	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Granitic, rocky. Elevations: 330-5580 ft. (100-1700 m.) Blooms May-Jul.	Not Expected	The species' associated habitat is not present in the Survey Area.
Camissoniopsis lewisii Lewis' evening-primrose	None/None G4/S4 3	Annual herb. Cismontane woodland, coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Clay (sometimes), sandy (sometimes). Elevations: 0-985 ft. (0-300 m.) Blooms Mar-May (Jun).	Not Expected	Coastal scrub (disturbed) is present within the Survey Area; however, most records of the species are coastal. This or other Camissoniopsis species were not observed during field surveys.
Ceanothus cyaneus Lakeside ceanothus	None/None G2/S2 1B.2	Perennial evergreen shrub. Chaparral, closed-cone coniferous forest. Elevations: 770-2475 ft. (235-755 m.) Blooms Apr-Jun.	Not Expected	The Survey Area is marginally within elevation range for this species. Suitable habitat is absent.
Ceanothus verrucosus wart-stemmed ceanothus	None/None G2G3/S2? 2B.2	Perennial evergreen shrub. Chaparral. Elevations: 5-1245 ft. (1-380 m.) Blooms Dec-May.	Not Expected	The species' associated habitat is not present in the Survey Area.
Centromadia parryi ssp. *australis* southern tarplant	None/None G3T2/S2 1B.1	Annual herb. Marshes and swamps, valley and foothill grassland, vernal pools. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. Elevations: 0-1575 ft. (0-480 m.) Blooms May-Nov.	Not Expected	The species' associated habitat marsh and swamp habitat is not present in the Survey Area.
Centromadia pungens ssp. *laevis* smooth tarplant	None/None G3G4T2/S2 1B.1	Annual herb. Chenopod scrub, meadows and seeps, playas, riparian woodland, valley and foothill grassland. Alkaline. Elevations: 0-2100 ft. (0-640 m.) Blooms Apr-Sep.	Not Expected	The species' associated habitat is not present in the Survey Area.
Chaenactis glabriuscula var. *orcuttiana* Orcutt's pincushion	None/None G5T1/S1 1B.1	Annual herb. Coastal bluff scrub, coastal dunes. Sandy sites. Elevations: 0-330 ft. (0-100 m.) Blooms Jan-Aug.	Not Expected	The Survey Area is outside of elevation range for this species.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Chamaebatia australis southern mountain misery	None/None G4/S4 4.2	Perennial evergreen shrub. Chaparral. Gabbro or metavolcanic soils. Elevations: 985-3345 ft. (300-1020 m.) Blooms Nov-May.	Not Expected	The species' associated soils are not present in the Survey Area.
Chorizanthe leptotheca Peninsular spineflower	None/None G3/S3 4.2	Annual herb. Chaparral, coastal scrub, lower montane coniferous forest. Granitic. Elevations: 985-6235 ft. (300-1900 m.) Blooms May-Aug.	Not Expected	The Survey Area is outside of elevation range for this species.
Chorizanthe orcuttiana Orcutt's spineflower	FE/SE G1/S1 1B.1	Annual herb. Chaparral, closed-cone coniferous forest, coastal scrub. Openings, sandy. Elevations: 10-410 ft. (3-125 m.) Blooms Mar-May.	Not Expected	The Survey Area is outside the known geographic and elevation range of this species, with most records being coastal.
Chorizanthe polygonoides var. *longispina* long-spined spineflower	None/None G5T3/S3 1B.2	Annual herb. Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Clay (often). Elevations: 100-5020 ft. (30-1530 m.) Blooms Apr-Jul.	Not Expected	The species' associated soils are not present in the Survey Area.
Cistanthe maritima seaside cistanthe	None/None G3G4/S3 4.2	Annual herb. Coastal bluff scrub, coastal scrub, valley and foothill grassland. Sandy. Elevations: 15-985 ft. (5-300 m.) Blooms (Feb) Mar-Jun (Aug).	Not Expected	Suitable coastal habitat is not found within the Survey Area. Additionally, this species was not observed during the field surveys.
Clarkia delicata delicate clarkia	None/None G3/S3 1B.2	Annual herb. Chaparral, cismontane woodland. Gabbroic (often). Elevations: 770-3280 ft. (235-1000 m.) Blooms Apr-Jun.	Not Expected	The species' associated soils are not present in the Survey Area.
Clinopodium chandleri San Miguel savory	None/None G2G3/S2 1B.2	Perennial shrub. Chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Gabbroic (sometimes), rocky (sometimes). Elevations: 395-3525 ft. (120-1075 m.) Blooms Mar-Jul.	Not expected	The species' associated soils are not present in the Survey Area.
Comarostaphylis diversifolia ssp. *diversifolia* summer holly	None/None G3T2/S2 1B.2	Perennial evergreen shrub. Chaparral, cismontane woodland. Often in mixed chaparral in California, sometimes post-burn. Elevations: 100-2590 ft. (30-790 m.) Blooms Apr-Jun.	Not Expected.	The species' associated habitat is not present in the Survey Area.
Convolvulus simulans small-flowered morning-glory	None/None G4/S4 4.2	Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Clay, seeps, serpentinite. Elevations: 100-2430 ft. (30-740 m.) Blooms Mar-Jul.	Not Expected.	The species' associated soils are not present in the Survey Area.
Corethrogyne filaginifolia var. *incana* San Diego sand aster	None/None G4T1Q/S1 1B.1	Perennial herb. Chaparral, coastal bluff scrub, coastal scrub. Most sites are disturbed, so hard to tell. Possibly in disturbed sites and ecotones. Elevations: 10-375 ft. (3-115 m.) Blooms Jun-Sep.	Low Potential.	Only marginal suitable habitat is present within the Survey Area. This species was not observed during the field surveys.
Corethrogyne filaginifolia var. *linifolia* Del Mar Mesa sand aster	None/None G4T1Q/S1 1B.1	Perennial herb. Chaparral, coastal bluff scrub, coastal scrub. In coastal, shrubby communities on maritime sediments and conglomerates; in openings. Elevations: 15-490 ft. (5-150 m.) Blooms May-Sep.	Not Expected.	The Survey Area is outside the known range of the species, with most records being coastal.
Cylindropuntia californica var. *californica* snake cholla	None/None G3T2/S1 1B.1	Perennial stem. Chaparral, coastal scrub. Elevations: 100-490 ft. (30-150 m.) Blooms Apr-May.	Not Expected.	The Survey Area is outside the known range of the species.
Dichondra occidentalis western dichondra	None/None G3G4/S3S4 4.2	Perennial rhizomatous herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. On sandy loam, clay, and rocky soils. Elevations: 165-1640 ft. (50-500 m.) Blooms (Jan)Mar-Jul.	Not Expected.	Suitable soils (sandy loam) are present within the Survey Area. This species has been observed within 10 miles of the Survey Area; however, these records are near Lake Hodges. This species was not observed during the field surveys.
Diplacus clevelandii Cleveland's bush monkeyflower	None/None G4/S4 4.2	Perennial rhizomatous herb. Chaparral, cismontane woodland, lower montane coniferous forest. Disturbed gravelly roadsides and slopes. Gabbro soils. Elevations: 1475-6560 ft. (450-2000 m.) Blooms Apr-Jul.	Not Expected.	The species' associated habitat and soils are not present in the Survey Area.
Dudleya brevifolia short-leaved dudleya	None/SE G1/S1 1B.1	Perennial herb. Chaparral, coastal scrub. On Torrey sandstone soils; in pebbly openings. Elevations: 100-820 ft. (30-250 m.) Blooms Apr-May.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Dudleya variegata variegated dudleya	None/None G2/S2 1B.2	Perennial herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools. In rocky or clay soils; sometimes associated with vernal pool margins. Elevations: 10-1905 ft. (3-580 m.) Blooms Apr-Jun.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Dudleya viscida sticky dudleya	None/None G2/S2 1B.2	Perennial herb. Chaparral, cismontane woodland, coastal bluff scrub, coastal scrub. On north and south-facing cliffs and banks. Elevations: 35-1805 ft. (10-550 m.) Blooms May-Jun.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Ericameria palmeri var. *palmeri* Palmer's goldenbush	None/None G4T2?/S2 1B.1	Perennial evergreen shrub. Chaparral, coastal scrub. On granitic soils, on steep hillsides. Mesic sites. Elevations: 100-1970 ft. (30-600 m.) Blooms (Jul) Sep-Nov.	Not Expected	Suitable habitat is present within the Survey Area. This species was not observed during the field surveys.
Eriodictyon sessilifolium sessile-leaved yerba santa	None/None G4/S1 2B.1	Perennial shrub. Coastal scrub. Volcanic. Elevations: 560-560 ft. (170-170 m.) Blooms Jul.	Not Expected	This species associated soils are not present within the Survey Area.
Eryngium aristulatum var. *parishii* San Diego button-celery	FE/SE G5T1/S1 1B.1	Annual/perennial herb. Coastal scrub, valley and foothill grassland, vernal pools. San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. Elevations: 65-2035 ft. (20-620 m.) Blooms Apr-Jun.	Not Expected	Vernal pools are not present within the Survey Area.
Erysimum ammophilum sand-loving wallflower	None/None G2/S2 1B.2	Perennial herb. Chaparral, coastal dunes, coastal scrub. Sandy openings. Elevations: 0-195 ft. (0-60 m.) Blooms Feb-Jun (Jul-Aug).	Not Expected	The Survey Area is outside the known range of the species, with most records being coastal.
Erythranthe diffusa Palomar monkeyflower	None/None G4/S3 4.3	Annual herb. Chaparral, lower montane coniferous forest. Sandy or gravelly soils. Elevations: 4005-6005 ft. (1220-1830 m.) Blooms Apr-Jun.	Not Expected	The Survey Area is outside the known range of the species, with most records being coastal.
Euphorbia misera cliff spurge	None/None G5/S2 2B.2	Perennial shrub. Coastal bluff scrub, coastal scrub, mojavean desert scrub. Rocky sites. Elevations: 35-1640 ft. (10-500 m.) Blooms (Oct) Dec-Aug.	Not Expected	The species' associated soils are not present in the Survey Area. The site lacks rocky areas. This species was not observed during the field surveys.
Ferocactus viridescens San Diego barrel cactus	None/None G3?/S2S3 2B.1	Perennial stem. Chaparral, coastal scrub, valley and foothill grassland, vernal pools. Often on exposed, level or south-sloping areas; often in coastal scrub near crest of slopes. Elevations: 10-1475 ft. (3-450 m.) Blooms May-Jun.	Not Expected	The species was not observed during the field surveys.
Geothallus tuberosus Campbell's liverwort	None/None G2/S2 1B.1	Ephemeral liverwort. Coastal scrub, vernal pools. Liverwort known from mesic soil. Elevations: 35-1970 ft. (10-600 m.)	Not Expected	Vernal pools are not present within the Survey Area.
Githopsis diffusa ssp. *filicaulis* Mission Canyon bluecup	None/None G5T1Q/S1 3.1	Annual herb. Chaparral. Probably in open, grassy places and mesic, disturbed areas; much overlooked. Elevations: 1475-2295 ft. (450-700 m.) Blooms Apr-Jun.	Not Expected	The Survey Area is outside the known range of the species.
Grindelia hallii San Diego gumplant	None/None G2/S2 1B.2	Perennial herb. Chaparral, lower montane coniferous forest, meadows and seeps, valley and foothill grassland. Frequently occurs in low moist areas in meadows. Associated species commonly include Wyethia, Ranunculus, Sidalcea. Elevations: 605-5725 ft. (185-1745 m.) Blooms May-Oct.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Harpagonella palmeri Palmer's grapplinghook	None/None G4/S3 4.2	Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within shrubland. Elevations: 65-3135 ft. (20-955 m.) Blooms Mar-May.	Not Expected	The species' soils are not present in the Survey Area.
Hazardia orcuttii Orcutt's hazardia	None/ST G1/S1 1B.1	Perennial evergreen shrub. Chaparral, coastal scrub. Often on clay; in grassy edges of chaparral and coastal scrub. Elevations: 260-280 ft. (80-85 m.) Blooms Aug-Oct.	Not Expected.	The species' associated soils are not present in the Survey Area. This conspicuous shrub was not observed during the field surveys.
Heterotheca sessiliflora ssp. *sessiliflora* beach goldenaster	None/None G4T2T3/S1 1B.1	Perennial herb. Chaparral, coastal dunes, coastal scrub. Sandy sites. Elevations: 0-4020 ft. (0-1225 m.) Blooms Mar-Dec.	Not Expected.	The species' associated soils are not present in the Survey Area.
Holocarpha virgata ssp. *elongata* curving tarplant	None/None G5T3/S3 4.2	Annual herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Elevations: 195-3610 ft. (60-1100 m.) Blooms May-Nov.	Not Expected.	This species was not observed during the field surveys.
Hordeum intercedens vernal barley	None/None G3G4/S3S4 3.2	Annual herb. Coastal dunes, coastal scrub, valley and foothill grassland, vernal pools. Vernal pools, dry, saline streambeds, alkaline flats. 5-. Elevations: 15-3280 ft. (5-1000 m.) Blooms Mar-Jun.	Not Expected.	Vernal pools are not present within the Survey Area.
Horkelia truncata Ramona horkelia	None/None G3/S3 1B.3	Perennial herb. Chaparral, cismontane woodland. Habitats in California include: mixed chaparral, vernal streams, and disturbed areas near roads. Clay soil; at least sometimes on gabbro. Elevations: 1310-4265 ft. (400-1300 m.) Blooms May-Jun.	Not expected.	The species' associated habitat and soils are not present in the Survey Area.
Isocoma menziesii var. *decumbens* decumbent goldenbush	None/None G3G5T2T3/S2 1B.2	Perennial shrub. Chaparral, coastal scrub. Sandy soils; often in disturbed sites. Elevations: 35-445 ft. (10-135 m.) Blooms Apr-Nov.	Not Expected.	Suitable habitat is present within the Survey Area. This species was not observed during the field surveys.

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Iva hayesiana San Diego marsh-elder	None/None G3/S2 2B.2	Perennial herb. Marshes and swamps, playas. Riverwashes. Elevations: 35-1640 ft. (10-500 m.) Blooms Apr-Oct.	Not Expected	Marshes and swamps are not present within the Survey Area.
Juglans californica Southern California black walnut	None/None G4/S4 4.2	Perennial deciduous tree. Chaparral, cismontane woodland, coastal scrub, riparian woodland. Slopes, canyons, alluvial habitats. Elevations: 165-2955 ft. (50-900 m.) Blooms Mar-Aug.	Not Expected	Coastal scrub (disturbed) associated habitat present within the Survey Area. However, generally suitable habitat is not present in the Survey Area. This species was not observed during the field surveys.
Juncus acutus ssp. *leopoldii* southwestern spiny rush	None/None G5T5/S4 4.2	Perennial rhizomatous herb. Coastal dunes, marshes and swamps, meadows and seeps. Moist saline places. Elevations: 10-2955 ft. (3-900 m.) Blooms (Mar) May-Jun.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Lasthenia glabrata ssp. *coulteri* Coulter's goldfields	None/None G4T2/S2 1B.1	Annual herb. Marshes and swamps, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-. Elevations: 5-4005 ft. (1-1220 m.) Blooms Feb-Jun.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Lathyrus splendens pride-of-California	None/None G4/S4 4.3	Perennial herb. Chaparral. Sandy to gravelly soils. Elevations: 655-5005 ft. (200-1525 m.) Blooms Mar-Jun.	Not Expected	The Survey Area is outside the known range of the species.
Lepechinia cardiophylla heart-leaved pitcher sage	None/None G3/S2S3 1B.2	Perennial shrub. Chaparral, cismontane woodland, closed-cone coniferous forest. Elevations: 1705-4495 ft. (520-1370 m.) Blooms Apr-Jul.	Not Expected	The Survey Area is outside the known range of the species.
Lepidium virginicum var. *robinsonii* Robinson's pepper-grass	None/None G5T3/S3 4.3	Annual herb. Chaparral, coastal scrub. Dry soils, shrubland. 4-. Elevations: 5-2905 ft. (1-885 m.) Blooms Jan-Jul.	Low Potential	Suitable habitat is present within the Survey Area. This species has been observed within five miles of the Survey Area. This species was not observed during the field surveys.
Leptosiphon grandiflorus large-flowered leptosiphon	None/None G3G4/S3S4 4.2	Annual herb. Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland. Open, grassy flats, generally sandy soil. Elevations: 15-4005 ft. (5-1220 m.) Blooms Apr-Aug.	Not Expected	The species' associated soils are not present within the Survey Area. This species was not observed during the field surveys.
Leptosyne maritima sea dahlia	None/None G2/S1S2 2B.2	Perennial herb. Coastal bluff scrub, coastal scrub. Occurs on a variety of soil types, including sandstone. Elevations: 15-490 ft. (5-150 m.) Blooms Mar-May.	Not Expected	The Survey Area is outside the known range of the species.
Lilium humboldtii ssp. *ocellatum* ocellated Humboldt lily	None/None G4T4?/S4? 4.2	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland. Yellow-pine forest or openings, oak canyons. Elevations: 100-5905 ft. (30-1800 m.) Blooms Mar-Jul (Aug).	Not Expected	The species' associated habitat is not present in the Survey Area.
Lycium californicum California box-thorn	None/None G4/S4 4.2	Perennial shrub. Coastal bluff scrub, coastal scrub. Elevations: 15-490 ft. (5-150 m.) Blooms Mar-Aug (Dec).	Not Expected	The Survey Area is outside the known range of the species.
Microseris douglasii ssp. *platycarpha* small-flowered microseris	None/None G4T4/S4 4.2	Annual herb. Cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools. Alkaline clay in river bottoms. Elevations: 50-3510 ft. (15-1070 m.) Blooms Mar-May.	Not Expected	Vernal pools and alkaline soils are not present in the Survey Area.
Monardella breweri ssp. *microcephala* small-headed monardella	None/None G5T3/S2 2B.2	Chaparral, Cismontane woodland, Lower montane coniferous forest. Disturbed areas (sometimes), Granitic, Openings 230-1200 m. Blooms May-Aug.	Not Expected	The species' associated habitat and soils are not present in the Survey Area.
Monardella hypoleuca ssp. *lanata* felt-leaved monardella	None/None G4T3/S3 1B.2	Perennial rhizomatous herb. Chaparral, cismontane woodland. Occurs in understory in mixed chaparral, chamise chaparral, and southern oak woodland; sandy soil. Elevations: 985-5170 ft. (300-1575 m.) Blooms Jun-Aug.	Not Expected	The Survey Area is outside the known range of the species.
Monardella viminea willowy monardella	FE/SE G1/S1 1B.1	Perennial herb. Chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland. In canyons, in rocky and sandy places, sometimes in washes or floodplains, with Baccharis, Iva, etc. Alluvial, ephemeral washes with adjacent coastal scrub. Elevations: 165-740 ft. (50-225 m.) Blooms Jun-Aug.	Not Expected	The species' associated habitat is not present within the Survey Area.
Myosurus minimus ssp. *apus* little mousetail	None/None G5T2Q/S2 3.1	Annual herb. Valley and foothill grassland, vernal pools. Alkaline soils. Elevations: 65-2100 ft. (20-640 m.) Blooms Mar-Jun.	Not Expected	Vernal pools and alkaline soils are not present in the Survey Area.
Navarretia fossalis spreading navarretia	FT/None G2/S2 1B.1	Annual herb. Chenopod scrub, marshes and swamps, playas, vernal pools. San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. Elevations: 100-2150 ft. (30-655 m.) Blooms Apr-Jun.	Not Expected	Vernal pools are not present in the Survey Area.

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Nemacaulis denudata var. *denudata* coast woolly-heads	None/None G3G4T2/S2 1B.2	Annual herb. Coastal dunes. Elevations: 0-330 ft. (0-100 m.) Blooms Apr-Sep.	Not Expected	The Survey Area is outside the known range of the species. Occurrences are closer to the coast.
Nolina cismontana chaparral nolina	None/None G3/S3 1B.2	Perennial evergreen shrub. Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. Elevations: 460-4185 ft. (140-1275 m.) Blooms (Mar) May-Jul.	Not Expected	The species associated soils are not present within the Survey Area.
Ophioglossum californicum California adder's-tongue	None/None G4/S4 4.2	Perennial rhizomatous herb. Chaparral, valley and foothill grassland, vernal pools. Grassy pastures, vernal pool margins, chaparral. Mesic sites. Elevations: 195-1725 ft. (60-525 m.) Blooms Jan-Jun (Dec).	Not Expected	The species' associated habitat is not present within the Survey Area.
Orcuttia californica California Orcutt grass	FE/SE G1/S1 1B.1	Annual herb. Vernal pools. Elevations: 50-2165 ft. (15-660 m.) Blooms Apr-Aug.	Not Expected	Vernal pools are not present in the Survey Area.
Packera ganderi Gander's ragwort	None/SR G2/S2 1B.2	Perennial herb. Chaparral. Recently burned sites and gabbro outcrops. Elevations: 1310-3935 ft. (400-1200 m.) Blooms Apr-Jun.	Not Expected	The Survey Area is outside the known range of the species.
Pentachaeta aurea ssp. *aurea* golden-rayed pentachaeta	None/None G4T3/S3 4.2	Annual herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland, valley and foothill grassland. Elevations: 260-6070 ft. (80-1850 m.) Blooms Mar-Jul.	Not Expected	The species' associated habitat is not present within the Survey Area.
Phacelia ramosissima var. *austrolitoralis* south coast branching phacelia	None/None G5?T3Q/S3 3.2	Perennial herb. Chaparral, coastal dunes, coastal scrub, marshes and swamps. Sandy, sometimes rocky sites. Elevations: 15-985 ft. (5-300 m.) Blooms Mar-Aug.	Not Expected	The species' associated habitat is not present within the Survey Area.
Phacelia stellaris Brand's star phacelia	None/None G1/S1 1B.1	Annual herb. Coastal dunes, coastal scrub. Open areas. Elevations: 5-1310 ft. (1-400 m.) Blooms Mar-Jun.	Not Expected	The Survey Area is outside the known range of the species, with most records being coastal.
Pinus torreyana ssp. *torreyana* Torrey pine	None/None G1T1/S1 1B.2	Perennial evergreen tree. Chaparral, closed-cone coniferous forest. On dry, sandstone slopes. Elevations: 100-525 ft. (30-160 m.)	Not Expected	This conspicuous tree species was not observed during the field surveys.
Piperia cooperi chaparral rein orchid	None/None G3/S3S4 4.2	Perennial herb. Chaparral, cismontane woodland, valley and foothill grassland. Elevations: 50-5200 ft. (15-1585 m.) Blooms Mar-Jun.	Not Expected	The species' associated habitat is not present within the Survey Area.
Pogogyne abramsii San Diego mesa mint	FE/SE G1/S1 1B.1	Annual herb. Vernal pools. Vernal pools within grasslands, chamise chaparral, or coastal sage scrub communities. Elevations: 295-655 ft. (90-200 m.) Blooms Mar-Jul.	Not Expected	Suitable vernal pool habitat is not present within the Survey Area.
Psilocarphus brevissimus var. *multiflorus* Delta woolly-marbles	None/None G4T3/S3 4.2	Annual herb. Vernal pools. Also on flats. Elevations: 35-1640 ft. (10-500 m.) Blooms May-Jun.	Not Expected	Vernal pools are not present within the Survey Area.
Quercus cedrosensis Cedros Island oak	None/None G2G3/S1 2B.2	Perennial evergreen tree. Chaparral, closed-cone coniferous forest, coastal scrub. Elevations: 835-3150 ft. (255-960 m.) Blooms Apr-May.	Not Expected	This conspicuous tree species was not observed during the field surveys.
Quercus dumosa Nuttall's scrub oak	None/None G3/S3 1B.1	Perennial evergreen shrub. Chaparral, closed-cone coniferous forest, coastal scrub. Generally on sandy soils near the coast; sometimes on clay loam. Elevations: 50-1310 ft. (15-400 m.) Blooms Feb-Apr (May-Aug).	Not Expected	Suitable habitat is present within the Survey Area. Other oak species, Q agrifolia and Q. berberidifolia were observed within Survey Area. This species was not observed during the field surveys.
Quercus engelmannii Engelmann oak	None/None G3/S3 4.2	Perennial deciduous tree. Chaparral, cismontane woodland, riparian woodland, valley and foothill grassland. Elevations: 165-4265 ft. (50-1300 m.) Blooms Mar-Jun.	Not Expected	Suitable habitat is present within the Survey Area. Other oak species, Q agrifolia and Q. berberidifolia were observed within Survey Area. This species was not observed during the field surveys.
Rhinotropis cornuta var. *fishiae* Fish's milkwort	None/None G5T4/S4 4.3	Chaparral, Cismontane woodland, Riparian woodland. Scree slopes, brushy ridges, and along creeks; often with oaks. 100-1000 m. Blooms May-Aug.	Not Expected	The species' associated habitat is not present within the Survey Area.
Rupertia rigida Parish's rupertia	None/None G4/S4 4.3	Perennial herb. Chaparral, cismontane woodland, lower montane coniferous forest, meadows and seeps, pebble (pavement) plain, valley and foothill grassland. Elevations: 2295-8205 ft. (700-2500 m.) Blooms Jun-Aug.	Not Expected	The Survey Area falls outside of the elevation and known geographic range of this species.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Salvia munzii Munz's sage	None/None G2/S2 2B.2	Perennial evergreen shrub. Chaparral, coastal scrub. Rolling hills and slopes, in rocky soil. Elevations: 375-3495 ft. (115-1065 m.) Blooms Feb-Apr.	Not Expected	While marginal suitable habitat is present within the Survey Area, this species was not observed during field surveys.
Selaginella cinerascens ashy spike-moss	None/None G3G4/S3? 4.1	Perennial rhizomatous herb. Chaparral, coastal scrub. Elevations: 65-2100 ft. (20-640 m.)	Not Expected	While marginal suitable habitat is present within the Survey Area, this species was not observed during field surveys.
Senecio aphanactis chaparral ragwort	None/None G3/S2 2B.2	Annual herb. Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. Elevations: 50-2625 ft. (15-800 m.) Blooms Jan-Apr (May).	Not Expected	Alkaline flat habitat is not present within the Survey Area.
Sidalcea neomexicana salt spring checkerbloom	None/None G4/S2 2B.2	Perennial herb. Chaparral, coastal scrub, lower montane coniferous forest, mojavean desert scrub, playas. Alkali springs and marshes. Elevations: 50-5020 ft. (15-1530 m.) Blooms Mar-Jun.	Not Expected	Alkali spring and marshes are not present within the Survey Area.
Sphaerocarpos drewiae bottle liverwort	None/None G1/S1 1B.1	Ephemeral liverwort. Chaparral, coastal scrub. Liverwort in openings; on soil. Elevations: 295-1970 ft. (90-600 m.)	Not Expected	The species' associated soils are not present within the Survey Area.
Stemodia durantifolia purple stemodia	None/None G5/S2 2B.1	Perennial herb. Sonoran desert scrub. Sandy soils; mesic sites. Elevations: 590-985 ft. (180-300 m.) Blooms (Jan)Apr-Dec.	Not Expected	Associated desert scrub habitat and sandy soils are not present within the Survey Area
Stipa diegoensis San Diego County needle grass	None/None G4/S4 4.2	Perennial herb. Chaparral, coastal scrub. Rocky slopes, sea cliffs and stream banks; often in mesic sites. Elevations: 35-2625 ft. (10-800 m.) Blooms Feb-Jun.	Not Expected	The species' associated habitat and soils are not present within the Survey Area nor was this species was not observed during the field surveys.
Suaeda esteroa estuary seablite	None/None G3/S2 1B.2	Perennial herb. Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. Elevations: 0-15 ft. (0-5 m.) Blooms (Jan-May) Jul-Oct.	Not Expected	No marsh or swamp habitat or associated soils are present within the Survey Area.
Suaeda taxifolia woolly seablite	None/None G4/S3S4 4.2	Perennial evergreen shrub. Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. Elevations: 0-165 ft. (0-50 m.) Blooms Jan-Dec.	Not Expected	The species' associated soils nor coastal bluff scrub/dune habitat are not found within the
Tetracoccus dioicus Parry's tetracoccus	None/None G2G3/S2 1B.2	Perennial deciduous shrub. Chaparral, coastal scrub. Stony, decomposed gabbro soil. Elevations: 540-3280 ft. (165-1000 m.) Blooms Apr-May.	Not Expected	The species' associated chaparral or coastal scrub habitat, nor associated soils are not found within the Survey area
Texosporium sancti-jacobi woven-spored lichen	None/None G3/S2 3	Crustose lichen (terricolous). Chaparral. Open sites; in California with Adenostoma fasciculatum, Eriogonum, Selaginella. Found on soil, small mammal pellets, dead twigs, and on Selaginella. Elevations: 195-2165 ft. (60-660 m.)	Not Expected	The species' associated chaparral habitat is not present within the Survey Area
Triquetrella californica coastal triquetrella	None/None G2/S2 1B.2	Moss. Coastal bluff scrub, coastal scrub. Grows within 30m from the coast in coastal scrub, grasslands and in open gravels on roadsides, hillsides, rocky slopes, and fields. On gravel or thin soil over outcrops. Elevations: 35-330 ft. (10-100 m.)	Not Expected	The Survey Area falls outside of the elevation and known geographic range of this species.
Xanthisma junceum rush-like bristleweed	None/None G5/S4 4.3	Perennial herb. Chaparral, coastal scrub. Dry hillsides. Elevations: 785-3280 ft. (240-1000 m.) Blooms Jan-Oct.	Not Expected	The Survey Area falls outside of the elevation and known geographic range of this species.
Sensitive Natural Communities				
Maritime Succulent Scrub	None/None G2/S1.1		Not Observed	Not Present within the Survey Area
San Diego Mesa Claypan Vernal Pool	None/None G2/S2.1		Not Observed	Not Present within the Survey Area
San Diego Mesa Hardpan Vernal Pool	None/None G2/S2.1		Not Observed	Not Present within the Survey Area
Southern Coast Live Oak Riparian Forest	None/None G4/S4		Not Observed	Not Present within the Survey Area
Southern Coastal Salt Marsh	None/None G2/S2.1		Not Observed	Not Present within the Survey Area

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Southern Cottonwood Willow Riparian Forest	None/None G3/S3.2		Not Observed	Not Present within the Survey Area
Southern Maritime Chaparral	None/None G1/S1.1		Not Observed	Not Present within the Survey Area
Southern Riparian Forest	None/None G4/S4		Not Observed	Not Present within the Survey Area
Southern Riparian Scrub	None/None G3/S3.2		Not Observed	Not Present within the Survey Area
Southern Sycamore Alder Riparian Woodland	None/None G4/S4		Not Observed	Not Present within the Survey Area
Southern Willow Scrub	None/None G3/S2.1		Not Observed	Not Present within the Survey Area
Torrey Pine Forest	None/None G1/S1.1		Not Observed	Not Present within the Survey Area

ft. =feet; m. =meters

Regional Vicinity refers to within a 9-quad search radius of site.

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
FPE = Federal Proposed Endangered
FPT = Federal Proposed Threatened
FD = Federal Delisted
FC = Federal Candidate
SE = State Endangered
ST = State Threatened
SCE = State Candidate Endangered
SCT = State Candidate Threatened
SR = State Rare
SD = State Delisted
SSC = CDFW Species of Special Concern
FP = CDFW Fully Protected
WL = CDFW Watch List

CRPR (CNPS California Rare Plant Rank)

1A = Presumed extirpated in California, and rare or extinct elsewhere
1B = Rare, Threatened, or Endangered in California and elsewhere
2A = Presumed extirpated in California, but common elsewhere
2B= Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
.3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

Special-Status Animal Species in the Regional Vicinity (Nine Quadrangles) of the Survey Area

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Invertebrates				
Bombus crotchii Crotch's bumble bee	None/SCE G2/S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	Low Potential	Eriogonum fasciculatum and Eschscholzia californica are present adjacent to the Project Area for foraging, but little is known about the natural history of the species. This species was not observed during the field surveys. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Survey Area.
Bombus pensylvanicus American bumble bee	None/None G3G4/S2	Long-tongued; forages on a wide variety of flowers including vetches (Vicia), clovers (Trifolium), thistles (Cirsium), sunflowers (Helianthus), etc. Nests above ground under long grass or underground. Queens overwinter in rotten wood or underground.	Low Potential	Foraging habitat may be present in the Survey Area. This species was not observed during the field surveys.
Branchinecta sandiegonensis San Diego fairy shrimp	FE/None G2/S1	Endemic to San Diego and Orange County mesas. Vernal pools.	Not Expected	No vernal pools are present within the Survey Area
Cicindela hirticollis gravida sandy beach tiger beetle	None/None G5T2/S2	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico. Clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.	Not Expected	The Project falls outside of the coastal zone; therefore, this species is not expected to occur.
Cicindela latesignata western beach tiger beetle	None/None G2G3/S1	Mudflats and beaches of coastal estuaries from San Diego County to Los Angeles County. Typically inhabit wet or dry sandy beaches and mud, sand, or salt flats.	Not Expected	The Project falls outside of the coastal zone; therefore, this species is not expected to occur.
Cicindela senilis frosti senile tiger beetle	None/None G2G3T1T3/S1	Inhabits marine shoreline, from Central California coast south to salt marshes of San Diego. Also found at Lake Elsinore. Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.	Not Expected	The Project falls outside of the coastal zone; therefore, this species is not expected to occur.
Coelus globosus globose dune beetle	None/None G1G2/S1S2	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.	Not Expected	Coastal sand dune habitat is absent within the Survey Area.
Danaus plexippus plexippus pop. 1 monarch - California overwintering population	FC/None G4T1T2Q/S2	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Not Expected	The Project falls outside of the coastal zone and no suitable habitat is present within the Survey Area; therefore, this species is not expected to occur.
Eugnosta busckana Busck's gallmoth	None/None G1G3/S2S3	Coastal southern California. Tiny micro-moth (1 cm) with larva forming galls on host plant Encelia californica (California brittlebush). Adult flight period is during winter, generally from November to February, and have been reported at UV lights and porch lights.	Not Expected	The Project falls outside of the coastal zone; therefore, this species is not expected to occur.
Euphydryas editha quino quino checkerspot butterfly	FE/None G4G5T1T2/S1S2	Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties. Hills and mesas near the coast. Need high densities of food plants Plantago erecta, P. insularis, and Orthocarpus purpurescens.	Not Expected	Marginal suitable habitat is present within the Study Area. Plantago. erecta was observed within the Study Area along the disturbed slope, however the site overall lacks high densities of food plants so species is not expected.
Melitta californica California mellitid bee	None/None G4?/S2?	Desert regions of SW Arizona, SE California, and Baja California, Mexico. Also collected from Torrey Pines, San Diego Co. Earlier records of M. wilmattae pertain to this species; species was synonymized with M. californica in 1981.	Not Expected	Suitable desert habitat is not present within the Survey Area.
Streptocephalus woottoni Riverside fairy shrimp	FE/None G1G2/S2	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	Not Expected	No suitable coastal sage scrub habitat nor astatic pools are present within Survey Area.
Tryonia imitator mimic tryonia (=California brackishwater snail)	None/None G2/S2	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.	Not Expected	Coastal lagoons, estuaries, or salt marshes are not present within the Survey Area.
Fish				
Gila orcuttii arroyo chub	None/None G1/S2 SSC	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave and San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.	Not Expected	No habitable streams occur within the Survey Area; therefore, this species is not expected to occur.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Amphibians				
Anaxyrus californicus arroyo toad	FE/None G2G3/S2 SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	Not Expected	Suitable washes, streams, and riparian habitat are absent from the Survey Area.
Spea hammondii western spadefoot	FPT/None G2G3/S3S4 SSC	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	Not Expected	Suitable grassland habitat and vernal pools are absent within the Survey Area.
Reptiles				
Actinemys pallida southwestern pond turtle	FPT/None G2G3/SNR SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 kilometer from water for egg-laying. Occurs in southern California from Monterey County south to Los Angeles, Riverside, and San Diego Counties into northern Baja California, Mexico.	Not Expected	No habitable streams or marsh habitat occur within the Survey Area; therefore this species is not expected to occur.
Anniella stebbinsi Southern California legless lizard	None/None G3/S3 SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	Low Potential	The Survey Area contains loamy soils, however it lacks overall suitable (or preferred) habitat such as soils with a high moisture content.
Arizona elegans occidentalis California glossy snake	None/None G5T2/S2 SSC	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	Low Potential	While suitable habitat is present in the Survey Area, suitable loose soils are not. Additionally, there is only one recorded CNDDB occurrence in 1964 approximately 4.8 miles southeast of the Project.
Aspidoscelis hyperythra orange-throated whiptail	None/None G5/S2S3 WL	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food: termites.	Low Potential	While suitable scrub habitat is present within the Survey Area, it is isolated, surrounded by areas of disturbance and the site lacks preferred habitat such as patches of rocks.
Aspidoscelis tigris stejnegeri coastal whiptail	None/None G5T5/S3 SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	Low Potential	Marginal suitable habitat including sagebrush is present within the Survey Area. There are 5 CNDDB occurrences within a 5-mile radius of the Project, with the nearest being 0.3-mile south of the Project in 2001.
Crotalus ruber red-diamond rattlesnake	None/None G4/S3 SSC	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	Low Potential	Marginal suitable habitat including grassland with patches of dense vegetation is present within the Survey Area. There is one CNDDB occurrence from 2003 approximately 4.65-miles southwest of the Project in 2001.
Diadophis punctatus similis San Diego ringneck snake	None/None G5T4/S2?	Open, fairly rocky areas. Use boards, flat rocks, woodpiles, stable talus, rotting logs and small ground holes for cover. Prefer areas with surface litter or herbaceous vegetation. Often in somewhat moist areas near intermittent streams.	Not Expected	No suitable habitat is present within the Survey Area and no CNDDB occurrences are found within a 5-mile radius of the Project.
Phrynosoma blainvillii coast horned lizard	None/None G4/S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Not Expected	No suitable habitat is present within the Survey Area and the most recent CNDDB occurrence found within a 5-mile radius of the Project is from 2002, approximately 4.20 miles southwest of the Project.
Plestiodon skiltonianus interparietalis Coronado skink	None/None G5T5/S2S3 WL	Grassland, chaparral, pinon-juniper and juniper sage woodland, pine-oak and pine forests in Coast Ranges of Southern California. Prefers early successional stages or open areas. Found in rocky areas close to streams and on dry hillsides.	Not Expected	No suitable habitat is present within the Survey Area and the most recent CNDDB occurrence found within a 5-mile radius of the Project is from 1994, approximately 2.75 miles southeast of the Project.
Salvadora hexalepis virgultea coast patch-nosed snake	None/None G5T4/S3 SSC	Brushy or shrubby vegetation in coastal Southern California. Require small mammal burrows for refuge and overwintering sites.	Not Expected	No suitable habitat is present within the Survey Area and the most recent CNDDB occurrence found within a 5-mile radius of the Project is from 2005, approximately 3.35 miles southwest of the Project.
Thamnophis hammondii two-striped gartersnake	None/None G4/S3S4 SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	Not Expected	No suitable habitat is present within the Survey Area and no CNDDB occurrences are found within a 5-mile radius of the Project.
Thamnophis sirtalis pop. 1 south coast gartersnake	None/None G5T1T2/S1S2 SSC	Southern California coastal plain from Ventura County to San Diego County, and from sea level to about 850 m. Marsh and upland habitats near permanent water with good strips of riparian vegetation.	Not Expected	No suitable habitat is present within the Survey Area and the most recent CNDDB occurrence found within a 5-mile radius of the Project is from 1928, approximately 4.85 miles southwest of the Project.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Birds				
Accipiter cooperii Cooper's hawk	None/None G5/S4 WL	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	Present	This species was observed within the Project Area and is known to occur within deciduous tree habitats for nesting. An individual was observed vocalizing and perching along the southern fence line.
Agelaius tricolor tricolored blackbird	None/ST G1G2/S2 SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	Low Potential	Suitable habitat is present within the Survey Area. This species is typically observed as a winter migrant and not as a local or resident species. There is one historic CNDDB occurrence within the Survey Area from 1994, noting multiple nesting colonies, however no additional observations have been noted since.
Aimophila ruficeps canescens southern California rufous-crowned sparrow	None/None G5T3/S4 WL	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Low Potential	While marginal foraging habitat is present within Survey Area nesting habitat is absent. There are five CNDDB occurrences recorded with the most recent being in 2017 approximately 3.15 miles southwest of the Project.
Ammodramus savannarum grasshopper sparrow	None/None G5/S3 SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Aquila chrysaetos golden eagle	None/None G5/S3 FP WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Artemisiospiza belli belli Bell's sparrow	None/None G5T2T3/S3 WL	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nests located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yards apart.	Low Potential	Marginal foraging habitat present within Survey Area while nesting habitat is absent. There are two CNDDB occurrences recorded between 2001 and 2002 approximately 4.5 miles southwest of the Project
Athene cunicularia burrowing owl	None/SCE G4/S2 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area. Additionally, the most recent CNDDB occurrence is from 1924, approximately 2.5-miles southwest of the Survey Area.
Buteo swainsoni Swainson's hawk	None/ST G5/S4	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	Not Expected	Suitable nesting and foraging habitat is not present within the Survey Area. While there are two CNDDB occurrences within 5-miles of the Project, the most recent is from 1924, approximately 2.25-miles to the southwest.
Campylorhynchus brunneicapillus sandiegensis coastal cactus wren	None/None G5T3Q/S2 SSC	Southern California coastal sage scrub. Wrens require tall opuntia cactus for nesting and roosting.	Not Expected	The species' associated nesting and foraging habitat is not present in the Survey Area. There are six CNDDB occurrences recorded within a 5-mile radius of the Project, however the most recent is from 1995, approximately 4.5-miles south of the Survey Area.
Charadrius nivosus nivosus western snowy plover	FT/None G3T3/S3 SSC	Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Not Expected	No suitable sandy beach, salt pond, or alkali lakes are present within the Survey Area. No CNDDB occurrences have been recorded within a 5-mile radius of the Survey Area.
Coccyzus americanus occidentalis western yellow-billed cuckoo	FT/SE G5T2T3/S1	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Elanus leucurus white-tailed kite	None/None G5/S3S4 FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Not Expected	The species' associated nesting and foraging habitat, including rivers, marshes, or open grasslands, are not present within the Survey Area.
Empidonax traillii extimus southwestern willow flycatcher	FE/SE G5T2/S3	Riparian woodlands in Southern California.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Eremophila alpestris actia California horned lark	None/None G5T4Q/S4 WL	Coastal regions, chiefly from Sonoma County to San Diego County. Also main part of San Joaquin Valley and east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Icteria virens yellow-breasted chat	None/None G5/S4 SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Laterallus jamaicensis coturniculus California black rail	None/ST G3T1/S2 FP	Inhabits 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.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Passerculus sandwichensis beldingi Belding's savannah sparrow	None/SE G5T3/S3	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in Salicornia on and about margins of tidal flats.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Plegadis chihi white-faced ibis	None/None G5/S3S4 WL	Shallow freshwater marsh. Dense tule thickets for nesting, interspersed with areas of shallow water for foraging.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Polioptila californica californica coastal California gnatcatcher	FT/None G4G5T3Q/S2 SSC	Obligate, permanent resident of coastal sage scrub below 2500 feet in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	Low Potential	Rincon protocol breeding surveys (April–May 2023) and non-breeding surveys (October 2023–February 2024) did not observe or record any CAGN within the Survey Area. Previous surveys in 2001 (Helix, 2001) also yielded negative results. Marginally suitable habitat is limited to disturbed patches of Diegan Coastal Sage Scrub along the southwestern Survey Area and more contiguous California brittlebush (Encelia californica)-dominated sage scrub within open space to the west within the Survey Area, however no suitable habitat is present within the Project Area. Additionally, while anecdotal observations occurred before EEPP development in 2001, the most recent CNDDB occurrence occurred in 2017 approximately three miles west of the Survey Area.
Pyrocephalus rubinus vermilion flycatcher	None/None G5/S2S3 SSC	During nesting, inhabits desert riparian adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas. Nest in cottonwood, willow, mesquite, and other large desert riparian trees.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Rallus obsoletus levipes light-footed Ridgway's rail	FE/SE G3T1T2/S1 FP	Found in salt marshes traversed by tidal sloughs, where cordgrass and pickleweed are the dominant vegetation. Requires dense growth of either pickleweed or cordgrass for nesting or escape cover; feeds on molluscs and crustaceans.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Setophaga petechia yellow warbler	None/None G5/S3 SSC	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Sternula antillarum browni California least tern	FE/SE G4T2T3Q/S2 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Vireo bellii pusillus least Bell's vireo	FE/SE G5T2/S3	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	Not Expected	The species' associated nesting and foraging habitat is not present within the Survey Area.
Mammals				
Antrozous pallidus pallid bat	None/None G4/S3 SSC	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Chaetodipus californicus femoralis Dulzura pocket mouse	None/None G5T3/S3	Found in a variety of habitats including coastal scrub, chaparral, and grassland in San Diego County, Baja California, and Mexico. Attracted to grass-chaparral edges.	Not Expected	While there are three CNDDB occurrences recorded within a 5-mile radius of the Project, the most recent is from 1993 within chaparral habitats approximately 3.75-miles southwest, and are not found within the Survey Area. Additionally, this species was not observed during any the field surveys.
Chaetodipus fallax fallax northwestern San Diego pocket mouse	None/None G5T3T4/S3S4	Inhabits coastal sage scrub, sagebrush scrub, grasslands, and chaparral communities. Found in open, sandy areas in southwestern California and northern Baja California. Prefers moderately gravelly and rocky substrates.	Not Expected	While there are three CNDDB occurrences recorded within a 5-mile radius of the Project, the most recent is from 1993 within mixed chaparral habitats approximately 4.45-miles southwest, and are not found within the Survey Area. Additionally, this species was not observed during any the field surveys.
Choeronycteris mexicana Mexican long-tongued bat	None/None G3G4/S1 SSC	Common throughout Mexico, this species is occasionally found in San Diego and Imperial Counties. Feeds on nectar and pollen of night-blooming succulents. Roosts in desert canyons, caves, and rock crevices. Also uses abandoned buildings. canyons, deep caves, mines, or rock crevices, desert canyons, deep	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Corynorhinus townsendii Townsend's big-eared bat	None/None G4/S2 SSC	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls and ceilings in caves, lava tubes, bridges, and buildings. This species is extremely sensitive to human disturbance.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, while there are two CNDDB occurrences have been recorded within a 5-mile radius of the Project, both are historic with the most recent being recorded in 1932.
Dipodomys stephensi Stephens' kangaroo rat	FT/ST G2/S3	Found primarily in annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil and use the burrows of California ground squirrels and pocket gophers. Occurs only in Southern California.	Not Expected	No suitable grassland or coastal scrub habitat is present within the Survey Area. Additionally, the site lacks burrowing animals and no diagnostic signs of the species (e.g., burrows or digs) were identified during any of the field surveys.
Euderma maculatum spotted bat	None/None G4/S3 SSC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Typically forages in open terrain; over water and along washes. Feeds almost entirely on moths. Roosts in rock crevices in cliffs or caves. Occasionally roosts in buildings.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Eumops perotis californicus western mastiff bat	None/None G4G5T4/S3S4 SSC	Occurs in open, semi-arid to arid habitats, including coniferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces and caves, and buildings. Roosts typically occur high above ground.	Low Potential	Individuals of this species could utilize scrub habitat within the Survey Area for foraging and the coniferous trees within for day roosts, however winter and maternal roosting by the species is not expected. This species was not observed during the field surveys and there are no recorded CNDDB occurrence within a 5-mile radius of the Project.
Lasionycteris noctivagans silver-haired bat	None/None G3G4/S3S4	Primarily a coastal and montane forest dweller, feeding over streams, ponds and open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes, and rarely under rocks. Needs drinking water.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Lasiurus cinereus hoary bat	None/None G3G4/S4	Typically roosts in trees in deciduous and coniferous forests and woodlands but occasionally roosts in rocks crevices. Forages in open areas, typically along riparian corridors or over water. Diet primarily consists of moths.	Low Potential	Individuals of the species could utilize the Survey Area for foraging and the coniferous trees within and adjacent to the Project for roosting, however the site lacks riparian corridors or water. This species was not observed during the field surveys, and while there are two CNDDB occurrences within a 5-mile radius of the Project, they are historic, with the most recent being in 1953.
Lasiurus frantzii western red bat	None/None G4/S3 SSC	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Not Expected	No suitable roosting habitat is present within the Survey area. While one CNDDB occurrences has been recorded within a 5-mile radius of the Project, it is a historic recording from 1984, approximately 2.4-miles east of the Project.
Lasiurus xanthinus western yellow bat	None/None G4G5/S3 SSC	Occurs in arid regions of the southwestern United States. Typically found in riparian woodlands, oak or pinyon-juniper woodland, desert wash, palm oasis habitats, and urban or suburban areas. Roosts in trees, often between palm fronds.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Lepus californicus bennettii San Diego black-tailed jackrabbit	None/None G5T3T4/S3S4	Occurs in Los Angeles, San Bernardino, Riverside, and San Diego Counties of southern California. Typically found in open shrub habitats. Will also occur in woodland habitats with open understory adjacent to shrublands.	Not Expected	The Survey Area is surrounded by industrial development and busy roadways. The species' associated habitat, which includes arid, grassland, and patchy coastal sage scrub habitats is not present in the Survey Area. Additionally, no CNDDB occurrences are recorded from within a 5-mile radius of the Project.
Myotis ciliolabrum western small-footed myotis	None/None G5/S3	Occurs in a wide range of arid and semiarid habitats including woodlands, open forests, riparian zones, and desert shrub. Roosts in rock crevices in caves, tunnels, and mines, also found beneath loose bark and in buildings. Forages for insects over water sources.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Myotis evotis long-eared myotis	None/None G5/S3	Found in all brush, woodland, and forest habitats throughout the western United States and Canada. Roosts in a variety of substrates including buildings, snags and hollow trees, loose bark, mines, caves, rock crevices.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Myotis yumanensis Yuma myotis	None/None G5/S4	Occurs in a variety of lowland and upland habitats including desert scrub, riparian, and woodlands and forests. Distribution is closely tied to bodies of water. Roosts in a variety of areas including caves, cliffs, mines, crevices in live trees, and buildings and other man-made structures.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Neotoma lepida intermedia San Diego desert woodrat	None/None G5T3T4/S3S4 SSC	Occurs in scrub habitats of southern California from San Luis Obispo County to San Diego County.	Not Expected	The species associated habitat is not present within the Survey Area and no middens (nests) were observed during the field survey. Additionally, the only CNDDB occurrence within a 5-mile radius of the Project is from 1993, approximately 4.35 miles southwest of the Project.
Nyctinomops femorosaccus pocketed free-tailed bat	None/None G5/S3 SSC	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Area	Habitat Suitability/ Observations
Nyctinomops macrotis big free-tailed bat	None/None G5/S3 SSC	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	Not Expected	No suitable roosting habitat is present within the Survey area. Additionally, no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Perognathus longimembris pacificus Pacific pocket mouse	FE/None G5T2/S2 SSC	Inhabits the narrow coastal plains from the Mexican border north to El Segundo, Los Angeles County. Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.	Not Expected	No suitable coastal plans are present within the Survey Area, additionally no CNDDB occurrences have been recorded within a 5-mile radius of the Project.
Taxidea taxus American badger	None/None G5/S3 SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not Expected	This species associated habitat is not present within the Survey Area. The site lacks burrowing animals and no diagnostic signs of the species (e.g., burrows or digs) were identified during any of the field surveys.

Regional Vicinity refers to within a 5-mile-search radius of site.

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
FPE = Federal Proposed Endangered
FPT = Federal Proposed Threatened
FD = Federal Delisted
FC = Federal Candidate
SE = State Endangered
ST = State Threatened
SCE = State Candidate Endangered
SCT = State Candidate Threatened
SR = State Rare
SD = State Delisted
SSC = CDFW Species of Special Concern
FP = CDFW Fully Protected
WL = CDFW Watch List

Additional notations may be provided as follows

T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)
Q – Questionable taxonomy that may reduce conservation priority
? – Inexact numeric rank

APPENDIX E

CULTURAL RESOURCES TECHNICAL REPORT

(Public Version)

Enterprise Battery Energy Storage System (BESS) Project

Revised Cultural Resources Technical Report
(Public Version)

Supplemental Petition for Post-Certification Amendment
Enterprise Emergency Peaker Project (CEC Docket 01-EP-10C)

prepared for

Enterprise BESS LLC
201 Enterprise Street
Escondido, California 92029

prepared by

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Revised March 2025

Please cite this report as follows:

Rincon Consultants, Inc.

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Executive Summary

Rincon Consultants, Inc. (Rincon) was retained to conduct a cultural resources study and prepare a Cultural Resources Technical Report for the Enterprise Battery Energy Storage System (Enterprise BESS) Project (Project) in Escondido, County of San Diego, California on behalf of Enterprise BESS LLC. Please note this study supersedes an assessment submitted to the California Energy Commission (CEC) in March 2024 as part of the Petition for Post-Certification Amendment to add a nominal 52 megawatt BESS to the existing Enterprise Emergency Peaker Project (EEPP). The layout of the proposed Enterprise BESS Project was modified following submittal of the March 2024 Petition, and this supplemental study analyzes the revised Project. This revised study supports the Supplemental Petition and supersedes the previous study.

Rincon understands that the Project is subject to approval by the CEC and a cultural resources study is needed to support the Post-Certification Amendment for the Project, pursuant to Title 20, California Code of Regulations, Section 1769 (a)(1) *Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision*.

The proposed Enterprise BESS Project includes interconnection-related facilities that are co-located with the existing CalPeak Power EEPP within the northern portion of Assessor's Parcel Number 232-410-45-00 at 201 Enterprise Street. The EEPP was licensed by the CEC in 2001 (CEC Docket No. 01-EP-10).

The Project also includes 52-megawatts of BESS facilities to be installed to the north of the EEPP on an approximately 0.82-acre site located at 2361 Auto Park Way on Assessor's Parcel Number's 232-410-21-00, 232-410-20-00, and 232-410-19-00. The BESS facilities would be connected to the low side of the existing generation step-up transformer at the EEPP via an approximately 350-foot-long gen-tie to be installed on an above ground cable tray.

The following analysis includes a general description of the proposed site areas and related facilities, maps of the proposed Project Area and related facilities, cultural resources records search, archival research, Sacred Lands File search, field survey, desktop historical built environment analysis, and recommendations. Although the CEC's regulatory nexus is exempt from compliance with the California Environmental Quality Act, this report refers to California Register of Historical Resources (CRHR) thresholds for assessing significance of cultural resources.

The background research and cultural resources survey identified one historic-age property in the Project Area, 2361 Auto Park Way, which was recorded and evaluated for listing in the National Register of Historic Places, the California Register of Historical Resources, and for local listing as a City of Escondido Local Landmark and listing to the City of Escondido local register. The property is recommended not eligible for federal, state, and local designation due to a lack of historic significance or architectural merit. The property at 2361 Auto Park Way is not considered a historical resource under the CRHR.

This cultural resources study and Cultural Resources Technical Report was completed according to Title 20, California Code of Regulations Section 1769 (a)(1) and includes discussion and assessment of the proposed Project changes, cultural resources present, and Project compliance with applicable laws, ordinances, regulations, standards. This report also assesses whether the original Conditions of Certification for cultural resources is applicable to the amendment. The original Conditions of Certification for cultural resources (CUL-1) states:

CUL-1 *The Project certified under this emergency process shall not cause any significant impact to any cultural resources. No on-site cultural resource monitoring is required for this Project. In the event of an inadvertent cultural discovery the following mitigation measures must be followed:*

- All work within 100 feet of the suspected cultural material must halt, and a qualified Cultural Resource Specialist shall be contacted immediately to evaluate the significance of the find. The Project Manager, Construction Manager, and Compliance Project Manager shall be notified if the resource is judged to be potentially significant, and the archaeologist may recommend further study.
- In the event that suspected human remains are encountered, work must stop immediately within a radius of 100 feet (30 meters) of the discovery, and the San Diego County Coroner's Office shall be notified within 24 hours of the find. If the skeletal remains are determined to be prehistoric, the Coroner's Office shall contact the Native American Heritage Commission to identify the Most Likely Descendant. The Most Likely Descendant shall be notified and determine the most appropriate disposition of the remains and any associated artifacts.

The proposed Project changes have a low potential to affect previously undisturbed cultural resources. Therefore, the Conditions of Certification (CUL-1) for the original certification are considered sufficient for the current amendment. Based on consultation with Enterprise BESS LLC, the applicant has committed to incorporating the measures of CUL-1 into the proposed Project in order to protect potentially present archaeological resources and human remains.

1 Introduction

Enterprise BESS LLC retained Rincon Consultants, Inc. (Rincon) to conduct a cultural resources analysis for the Enterprise Battery Energy Storage System (BESS) Project (Project) in Escondido, County of San Diego, California. This analysis was conducted to assist Enterprise BESS LLC in obtaining support for the Post-Certification Amendment for the Project that will be submitted to the California Energy Commission (CEC). This report was prepared to support the assessment of potential impacts to historical resources, unique archaeological resources, and tribal cultural resources as defined by the California Environmental Quality Act (CEQA), but pursuant to Title 20, California Code of Regulations, Section 1769(a)(1) *Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision*.

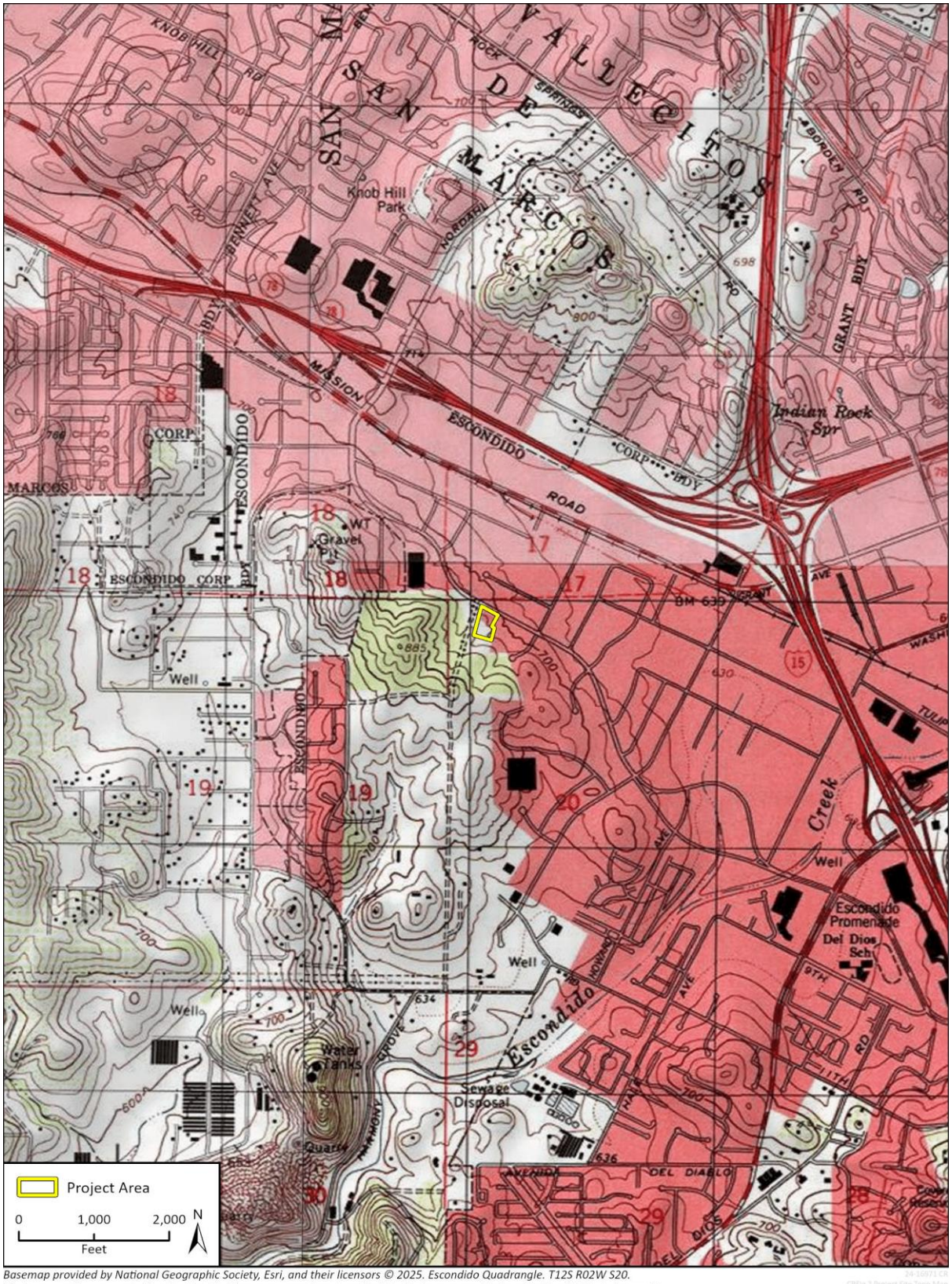
The following analysis includes a general description of the proposed site and related facilities, maps of the proposed Project Area and related facilities, cultural resources records search, archival research, Sacred Lands File (SLF) search, field survey, desktop historical built environment analysis, and recommendations.

1.1 Project Location

The proposed Project includes interconnection-related facilities within the northern portion of the Enterprise Emergency Peaker Project (EEPP) parcel, located at 201 Enterprise Street in Escondido, California, on Assessor's Parcel Number (APN) 232-410-45-00. The BESS-interconnection facilities would be co-located with the existing CalPeak Power – EEPP and would use approximately 0.1 acre within the northern portion of the approximately 2.94-acre EEPP site. The proposed Project also includes BESS facilities to be installed on approximately 0.82 acre of adjacent leased land to the north at 2361 Auto Park Way on APNs 232-410-19, 232-410-20, and 232-410-00. The 0.82-acre BESS site was most recently used as the Auto Art Paint & Body business up until January 2025. All four parcels comprising the Project site are depicted on the *Escondido, California,* United States Geological Survey 7.5-minute topographic quadrangle map, within Township 12 South, Range 02 West, Section 20 (Figure 1). The combined site area is bordered to the north by Auto Park Way, to the east and southeast by multiple commercial buildings, to the south by the San Diego Gas & Electric Company (SDG&E) Palomar Energy Center and to the west by vacant, undeveloped land owned by SDG&E, beyond which is Citracado Parkway.

The Project is located within a generally urbanized area with mixed commercial use but is bordered by patches of sage scrub on the undeveloped land to the west. The area analyzed for this study (Project Area, see Figure 2, below) includes the northern portion of the EEPP parcel and the three APNs to the north along Auto Park Way. The Project Area is defined as the combined 1.98-acre Project Area encompassing all four APNs as depicted in Figure 2, below.

Figure 1 Regional Location Map



Basemap provided by National Geographic Society, Esri, and their licensors © 2025. Escondido Quadrangle. T12S R02W S20.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Figure 2 Project Area Map

Imagery provided by Microsoft Bing and its licensors © 2025.

24-16971 Bio
Fig 2 Study Area

1.2 Project Description

Enterprise BESS LLC plans to construct, own and operate a nominal 52 megawatt BESS. The proposed Project includes interconnection-related facilities within the northern portion of the EEPP parcel, located at 201 Enterprise Street in Escondido, California, on APN 232-410-45-00. The BESS-interconnection facilities would be co-located with the existing CalPeak Power – EEPP and would use approximately 0.1 acre within the approximately 2.94-acre EEPP site. The existing CalPeak Power–EEPP was licensed by the CEC in 2001 (CEC Docket No. 01-EP-10). The proposed Project also includes BESS facilities to be installed on approximately 0.82 acre of adjacent leased land to the north at 2361 Auto Park Way on APNs 232-410-19, 232-410-20, and 232-410-00.

The proposed BESS Project would support California's current need for additional electrical supply capacity during high peak load demand periods. The Project would include containerized battery systems with internal heating, ventilation and air conditioning and internal fire detection and fire suppression systems in each container, battery management systems, power conversion systems (also called inverters), transformers, and electrical conductors. The Project includes an approximately 350-foot-long, aboveground, 13.8 kilovolt (kV) gen-tie line to be supported on a cable tray to connect the BESS facilities to the existing EEPP switchyard generation step-up (GSU) transformer. Access to the northern portion of the EEPP site is via the existing entrance at the EEPP on Enterprise Street. Access to the northern BESS area is via the adjacent Auto Park Way.

Enterprise BESS Project related improvements on the northern portion of the EEPP parcel include installation of: (1) gen-tie on elevated cable tray; (2) elevated switchgear platform; and (3) electrical and communication line connections in the EEPP switchgear area, including the low side of the GSU. Minor excavations associated with equipment foundations would be required.

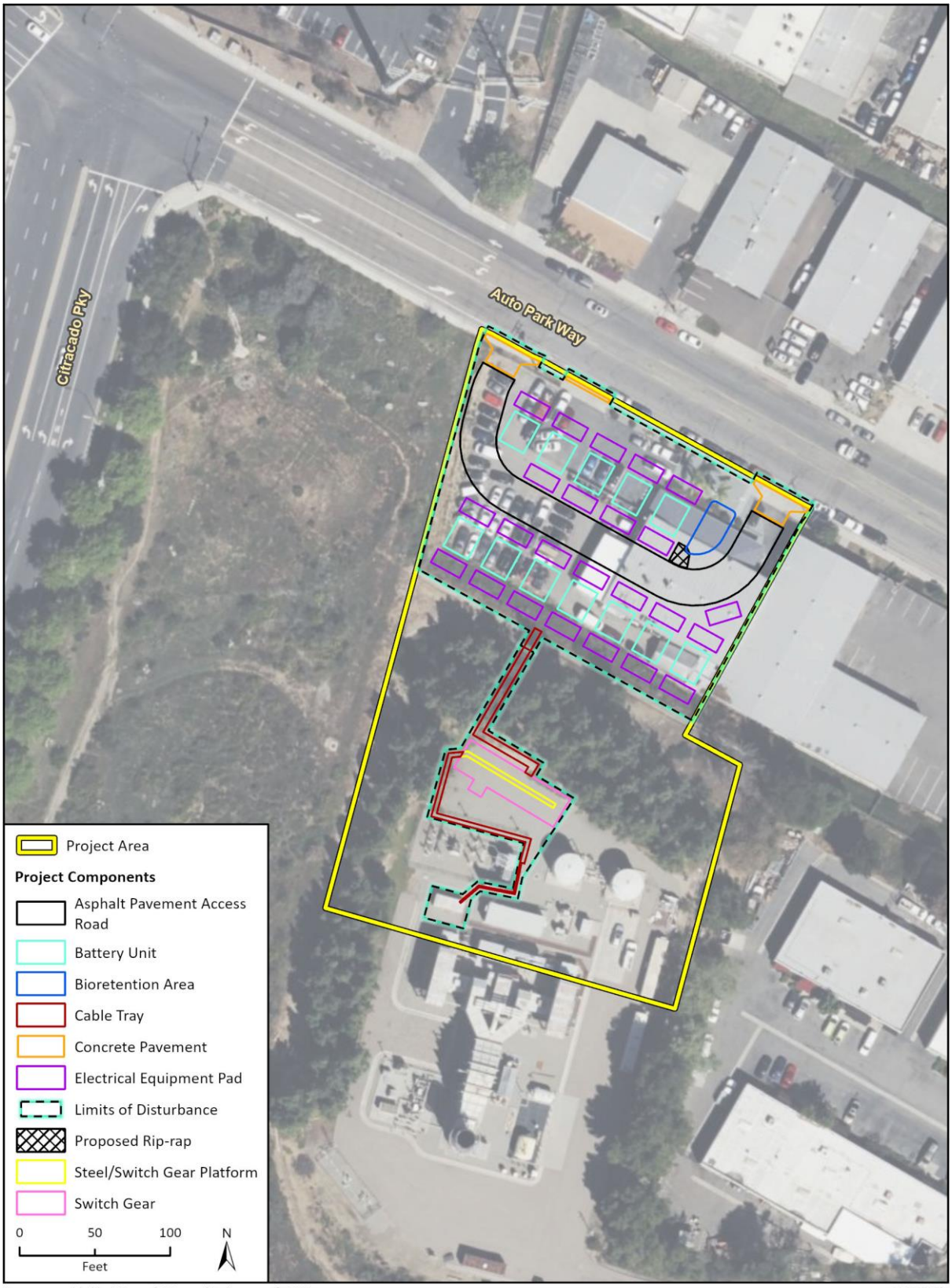
Development of the northern BESS parcels would require: (1) demolition of the existing auto body shop facilities; (2) grading, site preparation, and foundation installation for BESS facilities; (3) installation of an up to 18-foot-tall retaining wall near the southern border of the northern parcels area to stabilize the vertical cut near the property line that is associated with removal of the existing hillside to create an expanded level pad area for the Project. The Project development plan includes the installation of sheet piles along the southern border of the northern parcels to stabilize the cut slope prior to installation of the retaining wall. See a depiction of the various Project components in Figure 3, below.

The Enterprise BESS would be connected to the electrical grid via the existing GSU at the EEPP, which has an existing 69 kV connection to the SDG&E Escondido Substation to the north. The BESS Project would not require any high voltage modifications at the EEPP switchyard or the existing offsite 69 kV line. Operation of the BESS facility would be integrated with the existing EEPP, but the BESS would be charged from the electrical grid and not the EEPP. The BESS and the EEPP may be operated simultaneously in accordance with the market-optimized dispatch instructions received from the California Independent System Operator's Automated Dispatching System, but the combined output would be control-limited to never exceed the limit of the Generator Interconnection Agreement.

The Enterprise BESS Project would require discretionary permitting involving approval of a Supplemental Petition for Post-Certification Amendment from the CEC.

The Project's operational life and associated land leases are anticipated to be up to 40 years.

Figure 3 Detailed Site Plan



Imagery provided by Microsoft Bing and its licensors © 2025.

24-16971 Bio
Fig X Project Components

1.3 Personnel

Rincon Senior Archaeologist Mark Strother M.A., Registered Professional Archaeologist (RPA), managed this cultural resources study and provided senior oversight. Mark Strother meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (National Park Service [NPS] 1983). Archaeologist Rachel Bilchak, BA, conducted the archaeological pedestrian survey is a contributing author of this report. Archaeologist Alli Berry is also a contributing author of this report. Rincon Architectural Historian Ashley Losco, MHP, conducted the cultural resources evaluation for 2361 Auto Park Way and is a contributing author to this report. Ashley Losco meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History (NPS 1983). Rincon Geographic Information Systems Analysts Vivian Phan and Kaylee Herbold prepared the figures found in the report. Rincon Cultural Resources Principal Shannon Carmack reviewed this report for quality control and quality assurance.

2 Regulatory Setting

This section includes a discussion of federal, state, and local laws, ordinances, regulations, and standards governing cultural resources, as well as applicable Conditions of Certification and CEC siting guidelines. The CEC has jurisdiction over the proposed Project; therefore, the Project should adhere to Title 20, California Code of Regulations, Section 1769 (a)(1): *Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision*.

2.1 Federal Regulations

National Historic Preservation Act

Cultural resources are considered during federal undertakings chiefly under Section 106 (as amended) through one of its implementing regulations, 36 Code of Federal Regulations (CFR) 800 (Protection of Historic Properties), and the National Environmental Policy Act. Properties of traditional, religious, and cultural importance to Native Americans are considered under both Section 101 (d)(6)(A) and Section 106 36 CFR 800.3-800.10 of the National Historic Preservation Act (Department of the Interior 2004). Other federal laws include the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1989, among others.

Section 106 (16 United States Code 470f) requires federal agencies to account for the effects of their undertakings on any district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected historic property is assessed and mitigation measures are proposed to reduce any impacts to an acceptable level. Historic properties are those significant cultural resources listed in or eligible for listing in the NRHP per the criteria listed at 36 CFR 60.4.

There is currently no federal regulatory nexus for the Enterprise BESS Project.

2.2 State Regulations

Section 21.11 A. Exemption from CEQA Documentation Requirements

Certified regulatory programs such as the CEC are exempt from the provisions of CEQA concerning preparation of initial studies, negative declarations, and EIRs contained in CEQA Chapters 3 and 4 (Public Resources Code Sections 21100–21154). The environmental review and public comment procedures required under the CEC's regulatory program are deemed equivalent to review under CEQA. Instead of preparing an environmental review document under CEQA, the CEC follows the environmental review process included in its own regulatory program.

California Environmental Quality Act

Formal findings of importance (for state purposes, eligibility for the CRHR) and Project effects are made by the lead state regulatory agency or, for federal undertakings, in consultation with the federal

lead agency, the State Historic Presentation Officer, and the Advisory Council on Historic Preservation. The administering agency for this authority is the CEC.

A Historical Resource is one listed in or determined to be eligible for listing in the CRHR (Section 21084.1), included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section 15064.5[a][3]). Resources listed in the NRHP are automatically listed in the CRHR.

According to CEQA, impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect. Significant effects or impacts could result from the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). *Material impairment* is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

Although CEC projects are exempt from CEQA, CRHR thresholds were used to assess resource significance for purposes of this study.

California Code of Regulations Title 20, Section 1769: Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision.

(a) Change in Project Design, Operation, or Performance Requirements.

(1) After the final decision is effective under §1720.4, the Project owner shall petition the commission for approval of any change it proposes to the Project design, operation, or performance requirements. The petition must contain the following information:

(A) A complete description of the proposed change, including new language for any conditions of certification that will be affected;

(B) A discussion of the necessity for the proposed change and an explanation of why the change should be permitted;

(C) A description of any new information or change in circumstances that necessitated the change;

(D) An analysis of the effects that the proposed change to the Project may have on the environment and proposed measures to mitigate any significant environmental effects;

(E) An analysis of how the proposed change would affect the Project's compliance with applicable laws, ordinances, regulations, and standards;

(F) A discussion of how the proposed change would affect the public;

(G) A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected Project linears and 1000 feet of the Project Area;

(H) A discussion of the potential effect of the proposed change on nearby property owners, residents, and the public; and

(I) A discussion of any exemptions from the California Environmental Quality Act, commencing with §21000 of the Public Resources Code, that the Project owner believes may apply to approval of the proposed change.

(2) Within 30 days after a petition is filed and the applicable fee is paid, staff shall review the petition to determine the extent of the proposed change and prepare a summary of the petition. The summary shall be concise and understandable, shall describe the content of the petition using the applicant's own words whenever possible, and shall include a description of the commission's procedures concerning proceedings on the petition, as appropriate. As soon as practicable after preparing the summary, staff shall file the summary and provide a copy to each property owner described in subdivision (a)(1)(G) with instructions on how to receive future filings.

(3) Staff Approval of Proposed Change.

(A) Staff shall approve the change where staff determines:

(i) that there is no possibility that the change may have a significant effect on the environment, or the change is exempt from the California Environmental Quality Act;

(ii) that the change would not cause the Project to fail to comply with any applicable laws, ordinances, regulations, or standards; and

(iii) that the change will not require a change to, or deletion of, a condition of certification adopted by the commission in the final decision or subsequent amendments.

(B) Staff, in consultation with the air pollution control district where the Project is located, may approve any change to a condition of certification regarding air quality, provided:

(i) that the criteria in subdivisions (a)(3)(A)(i) and (ii) are met; and

(ii) that no daily, quarterly, annual or other emission limit will be increased as a result of the change.

(C) Staff shall file a statement summarizing its actions taken pursuant to subdivisions (a)(3)(A) or (B). Any person may file an objection to a staff action taken pursuant to subdivisions (a)(3)(A) or (B) within 14 days of the filing of staff's statement. Any such objection must make a showing supported by facts that the change does not meet the criteria in this subdivision. Speculation, argument, conjecture, and unsupported conclusions or opinions are not sufficient to support an objection to staff approval.

(D) Staff may submit to the commission, for consideration and a decision, a proposed change that could otherwise be approved by staff under subdivisions (a)(3)(A) or (B).

(4) Commission Approval of Proposed Change.

(A) If staff determines that a change does not meet the criteria for staff approval set forth in subdivision (a)(3), or if staff submits the proposed change to the commission for consideration under subdivision (a)(3)(D), or if a person files an objection that complies with subdivision (a)(3)(C), the petition shall be considered by the commission at a noticed business meeting or hearing. The commission shall issue an order approving, rejecting, or modifying the petition or assign the matter for further proceedings before the commission or an assigned committee or hearing officer. The commission may approve such a change only if it can make the findings specified in §1748(b), if applicable.

(B) In any matter assigned for further proceedings pursuant to subdivision (a)(4), the presiding member shall establish the schedule and process for the proceeding.

(5) The petitioner may withdraw its petition from consideration by the commission in the manner described for withdrawal of notices or applications in §1709.8.

2.3 Local Regulations

County of San Diego

The following information on the County of San Diego regulations is provided for informational purposes, the Project Area falls in the jurisdiction of the City of Escondido. The County of San Diego has guidelines for determining the significance of archaeological and historical resources, as well as mitigation measures to avoid, preserve, and adequately record significant cultural resources. The County of San Diego Guidelines for Determining Significance (County of San Diego 2007) and includes the following goals, policies, and implementation measures as they pertain to the preservation of cultural and historic resources.

If it can be demonstrated that a project will cause damage to a significant cultural resource, reasonable efforts must be made to mitigate the impact to a level below significant. Mitigation measures identified by CEQA (Section 21083.2) and *CEQA Guidelines* (Section 15064.5) include the following:

Section 21083.2

(b) If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:
   (1) Planning construction to avoid cultural resources.
   (2) Deeding cultural resources into permanent conservation easements.
   (3) Capping or covering cultural resources with a layer of soil before building on the sites.
   (4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(e) Excavation as mitigation shall be restricted to those parts of the unique cultural resource that would be damaged or destroyed by the Project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines the testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.

Section 15064.5

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.
   (3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) shall be considered as mitigated to a level of less than a significant impact on the historical resource.
   (4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any

adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

(5) When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

Accidental Discovery of Human Remains

(f) In the event of an accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

(1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

(A) The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and

(g) If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission within 24 hours.
2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
3. The Most Likely Descendent may make recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or

(2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

(A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.

(B) The descendent identified fails to make a recommendation; or

(C) The landowner or his authorized representative reject the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Accidental Discovery of Historical or Unique Archaeological Resources

(f) As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue in other parts of the building site while historical or unique archaeological resource mitigation takes place.

City of Escondido General Plan

The City of Escondido's General Plan (City of Escondido 2012) includes the following goals and policies for historic and cultural resources:

5. Historic and Cultural Resources

Goal 5: Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.

Cultural Resources Policy 5.1: Maintain and update the Escondido Historic Sites Survey to include significant resources that meet local, state, or federal criteria.

Cultural Resources Policy 5.2: Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.

Cultural Resources Policy 5.3: Consult with appropriate organizations and individual (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.

Cultural Resources Policy 5.4: Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.

Cultural Resources Policy 5.5: Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation, rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.

Cultural Resources Policy 5.6: Review proposed new development and/or remodels for compatibility with the surrounding historic context.

Cultural Resources Policy 5.7: Comply with appropriate local, State, or federal regulations governing historical resources.

Cultural Resources Policy 5.8: Consider providing financial incentives, and educational information on existing incentives provided by the federal government to private owners and development in order to maintain, rehabilitate, and preserve historic resources.

Cultural Resources Policy 5.9: Educate the public on the City's important historic resources in increased awareness for protection (City of Escondido 2012).

City of Escondido Historic Resources Ordinance

The City of Escondido Historic Resources Ordinance (Ord. No. 2024-05 [2024]) authorizes the director of development services to designate local landmarks or list a resource on the local register, as approved by the City Council, by the procedures outlined in the ordinance. An eligible property may be nominated and designated as a landmark or listed on the local register if it satisfies the requirements set forth below.

"Local historical landmark" means any historical resource that has been registered as a local historical landmark pursuant to this article because of its outstanding historic, cultural, architectural,

archaeological, or community interest or value as part of the development, the heritage or history of the city.

“Local register of historical places” means a local list established by the city council of districts, sites, buildings, uses, landscape features, signs, structures and objects of local, state or national importance that are significant and warrant protection because of their historic, architectural, archaeological, or cultural values. The local register includes local historical landmarks and districts.

Criteria

Prior to granting a resource local register or historical landmark status, the zoning administrator shall consider the definitions for historical resources and historical districts and shall find that the resource conforms to one or more of the criteria listed below. A structural resource proposed for the local register shall be evaluated against criteria number one through seven and must meet at least two of the criteria. Signs proposed for the local register shall meet at least one of the criteria numbered eight through 10. Landscape features proposed for the local register shall meet criterion number 11. Archaeological resources shall meet criterion number 12. Local register resources proposed for local landmark designation shall be evaluated against criterion number 13. The criteria are as follows:

1. Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state or nation;
2. Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
3. Escondido historical resources that are connected with a business or use that was once common but is now rare;
4. Escondido historical resources that are the sites of significant historic events;
5. Escondido historical resources that are 50 years old or have achieved historical significance within the past 50 years;
6. Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area or district;
7. Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type;
8. Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;
9. Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;
10. Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;
11. Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities;
12. Escondido archaeological site that has yielded, or may be likely to yield, information important in prehistory;
13. Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests.

3 Natural and Cultural Setting

This section provides background information pertaining to the natural and cultural context of the Project Area. It places the Project in the broader natural environment that has sustained populations throughout history. This section also provides an overview of regional indigenous history, local ethnography, and post-European contact history. This background information describes the distribution and type of cultural resources documented in the vicinity of the Project Area to inform the cultural resources sensitivity assessment included herein.

3.1 Natural Setting

The Project Area is located approximately 1 mile northwest of Escondido Creek, 12 miles east of the Pacific Ocean, and approximately 3 miles northeast of the Elfin Forest Recreational Reserve. Elevations within the Project Area range from approximately 770 feet above mean sea level for the sloped area from the south, 750 feet from the northern boundary, sloping down to 735 feet in the southeastern portion. The vicinity of the Project Area is highly industrialized and commercially developed with established roadways to the north and west. A majority of the Project Area has been graded in the past or is currently developed. Landscaped berm areas, consisting of mainly ornamental trees, provide a visual buffer along the southwestern and southeastern boundaries of the Project Area. The Project Area's climate varies from an average 56°F in the winter to 76°F in the summer, with an annual average rainfall of 15.2 inches (City of Escondido n.d.).

According to published geologic evaluation prepared by Ninyo & Moore Geotechnical and Environmental Sciences Consultants (2001), the Project Area is within the Peninsular Ranges Geomorphic Province. The province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the Southern California batholith. The soils within the Project Area were first graded prior to 1974, during which the Project Area was excavated in the southern and northeastern portions, and 2 feet of fill soil was placed atop the Project Area. Reconnaissance and subsurface evaluation found 2 to 22 feet of fill soil and granitic rock are present throughout the Project Area (Ninyo & Moore Geotechnical and Environmental Sciences Consultants 2001).

The Project area is not within an alluvial deposit and predates the Holocene (the age of human occupation); therefore, the archaeological sensitivity for the Project Area, based on sediments alone, is low. However, this does not preclude the existence of buried archaeological materials (California Soil Resource Lab 2017).

3.2 Cultural Setting

3.2.1 Indigenous History

The Project Area lies in what is described generally as California's Southern Bight (Byrd and Raab 2007). This region extends from the Mexican border to Santa Monica and includes Orange and San Diego counties, western Riverside County, and the Southern Channel Islands. At European contact, the region was occupied by the Tongva, Juaneño, Luiseño, Cupeño, and Kumeyaay (Ipai and Tipai). For this study, the indigenous cultural chronology for the Southern Bight is presented following Byrd

and Raab (2007), who divided it into the Early (9600–5600 Before Common Era [BCE]), Middle (5600–1650 BCE), and Late (1650 BCE–1769 Common Era [CE]) Holocene.

Early Holocene (ca. 9600–5600 BCE)

Evidence of Paleo-Indian occupation of Southern California remains very limited. The earliest accepted dates for human occupation of the California coast are from the Northern Channel Islands, off the Santa Barbara coast. Daisy Cave, on San Miguel Island, dates to as early as 9600 BCE (Erlandson et al. 1996). Human remains found at the Arlington Springs site on Santa Rosa Island have yielded a date of approximately 10,000 BCE (Johnson et al. 2002). San Diego and Orange counties and the Southern Channel Islands have not produced dates as early as these, but radiocarbon evidence has dated early occupation of the coastal region between circa (ca.) 8000 and 7000 BCE (Byrd and Raab 2007).

Traditional models describe California's first inhabitants as big-game hunters roaming North America during the end of the last Ice Age. As the Ice Age ended, warmer and drier climatic conditions are thought to have created widespread cultural responses. The pluvial lakes and streams in the desert interior began to wane and cultures dependent on these water sources migrated to areas with moister conditions, such as the Southern California coast (Byrd and Raab 2007).

The San Dieguito Complex is a well-defined cultural response to these changing climatic conditions in the southern California coastal region and was named originally for the cultural sequence in western San Diego County (Rogers 1929, 1939). Leaf-shaped points, knives, crescents, and scrapers characterize the artifact assemblages throughout the region (Byrd and Raab 2007). San Dieguito sites show evidence generally of the hunting of various animals, including birds, and gathering of plant resources (Moratto 1984).

Middle Holocene (ca. 5600–1650 BCE)

The Middle Holocene is viewed as a time of cultural transition. During this time, the cultural adaptations of the Early Holocene gradually altered. Use of milling stone tools began to appear across most of central and Southern California around 6000 to 5000 BCE, indicating a focus on the collection and processing of hard-shelled seeds. Environmental changes in the Southern Bight are thought to have been the key factor in these changing adaptations (Byrd and Raab 2007). Occupation patterns indicated semi-sedentary populations focused on the bays and estuaries of San Diego and Orange counties, with shellfish and plant resources as the most important dietary components (Warren 1968). In the San Diego County area, this adaptive strategy is known as the La Jolla complex.

Sometime around 4,000 years ago, extensive estuarine silting began to cause a decline in shellfish resulting in a depopulation of the coastal zone. Settlement shifted to river valleys, and resource exploitation focused on hunting small game and gathering plant resources (Warren 1968, Byrd and Raab 2007).

Late Holocene (ca. 1650 BCE–1769 CE)

The Late Holocene witnessed numerous cultural adaptations. The bow and arrow were adopted sometime after 500 CE, and ceramics are found with frequency in sites dating to ca. 1200 CE. Food surpluses, especially of acorns, sustained populations (Byrd and Raab 2007, Kroeber 1925). Other exploited food resources include shellfish, fish, small terrestrial mammals, and small-seeded plants.

Settlement patterns of the Late Holocene are characterized by large residential camps linked to smaller specialized camps for resource procurement (Byrd and Raab 2007).

3.2.2 Ethnographic Overview

The Project Area occurs in an area that has been traditionally occupied by the Luiseño and the Kumeyaay/Diegueño (Ipai).

Luiseño

The traditional territory of the Luiseño extends along the coast of modern-day Southern California in San Diego and Riverside Counties, spanning between Aliso Creek in the north down to Agua Hedionda Creek in the south. The territory is recorded as far inland as Palomar Mountain in the south and Lake Elsinore in the north (Kroeber 1925, Bean and Shipek 1978). The population of the Luiseño prior to the arrival of Europeans is believed to be approximately 3,500 (O'Neil 2002). Linguists classify the Luiseño language as part of the Cupan group of the Takic languages, which falls under the larger Uto-Aztecan language family with origins in the Great Basin (Bean and Shipek 1978, Mithun 2001). Linguistic studies suggest that Takic-speaking immigrants from the Great Basin displaced Hokan speakers sometime after 500 BCE (Bean and Shipek 1978). The modern names of the Native American Tribes in San Diego County are derived from the Spanish mission period as well as rivers that were present in the tribal territory at the time of European contact. The Spanish applied the term Luiseño to Native Americans enslaved by the Spanish at Mission San Luis Rey, which included the Gheecham, Kheecham, and Aguas Calientes Indians. Prior to missionization, the Luiseño living in the area referred to themselves as the Payomkawichum (Bean and Shipek 1978, Mithun 2001, Rincon Band of Luiseno Indians 2020).

Prior to European contact, the Luiseño lived in permanent, politically autonomous villages with associated seasonal camps for subsistence exploitation. Villages ranged in size from 50 to 400 people. Each village controlled a larger resource territory and maintained ties to other villages through trade and social networks. Trespassing in the resource area of another village was cause for war (Bean and Shipek 1978). Village structures consisted of dome-shaped dwellings (kish), sweat lodges, and a ceremonial enclosure (vamkech). Leadership in the villages focused on the chief, or Nota, and a council of elders or puuplem. The chief controlled religious, economic, and war-related activities. Religious leaders would have their own patrilineal clan along with other chief-less clans and individuals broken from other clans (Kroeber 1925, Bean and Shipek 1978).

Traditional Luiseño subsistence was focused on the acorn and supplemented by the gathering of other plant resources and shellfish, as well as fishing and hunting. Plant foods typically include pine nuts, seeds from various grasses, manzanita, sunflower, sage, chia, lemonade berry, prickly pear, and lamb's-quarter. Common animal resources include deer, antelope, rabbit, quail, ducks and other birds. Fish were exploited from nearby rivers and creeks. Marine fish and sea mammals were caught from the shore and dugout canoes. Shellfish collected from the shore included abalone, turbans, mussels, clams, scallops, and other species (Bean and Shipek 1978). Traditional Luiseño pottery can be distinguished from other groups in the area and includes but is not limited to, an earthen vessel called narungrush, a wide mouth vessel called a wiwlish, a small mouth vessel called nadungdamal, and a vessel with two small mouths called a papakamal. The narungrush was utilized for keeping water cool and storing seeds. Wiwlish vessels were used for cooking food. The nadungdamal and papakamal vessels were used for carrying water (Sparkman 1908).

The traditional Luiseño religion is known as Chinigchinich, the last of a series of heroic mythological figures. The heroes were originally from the stars and their sagas formed Luiseño religious beliefs. Ethnographers recorded that religious rituals took place in a brush enclosure that housed a representation of Chinigchinich. Recorded ritual ceremonies include puberty initiation rites, burial and cremation ceremonies, hunting rituals, and peace rituals (Kroeber 1925, Bean and Shipek 1978). Puberty ceremonies for both girls and boys would include painting pictographs and petroglyphs, categorized by archaeologist as the San Luis Rey style or "Luiseño Rectilinear Abstract." It is characterized by zigzags, chevrons, straight lines, and diamond chains (DuBois and Kroeber 1908: 96, Hedges 2002).

Today there are seven bands of Luiseño people including the San Luis Rey, Pala, Pauma, La Jolla, Rincón, Pechanga, and Sobóba. While the effects of Mission San Luis Rey since 1798 contributed heavily to a decline in traditional practices (White 1953), the Luiseño today have maintained a majority of their traditional customs and ceremonies with many Luiseño people continue to speak their native language, sing traditional songs, and use oral history through story-telling (NativeTalk 2022).

Kumeyaay/Diegueño (Ipai)

The Project Area is located in the traditional territory of the Kumeyaay or Diegueño, which includes the region along the Pacific coast from central San Diego County southward into Baja California and eastward into Imperial County (Zepeda 2020). European settlers in the area referred to them as the Diegueño or Diegueno due to the nearby Mission San Diego de Alcala (Gifford 1931). They refer to themselves as "Kumeyaay," which refers to both the Ipai and Tipai groups. Linguistic studies support the division of the Kumeyaay people into northern (Ipai) and southern (Tipai) dialect groups (Gifford 1931, Luomala 1978). Ipai territory includes the area north of La Jolla to Agua Hedionda Lagoon with tremendous environmental variation and resource zones. The Tipai territory includes the Pacific coast from La Jolla south to below Ensenada and Todos Santos Bay in Baja California, Mexico. The Kamia, or Desert Kumeyaay, are Tipai located in parts of eastern San Diego County, portions of northeastern Baja California, and the majority of the western portion of Imperial County (Gifford 1931, Luomala 1978). Neighboring groups included the Luiseño and Cupeño to the northwest, the Cahuilla to the northeast, the Quechan to the east, and the Paipai to the south (Kroeber 1925).

Kumeyaay bands typically controlled 10 to 30 linear miles in a drainage system. Each band's territory contained a primary village and a number of secondary homesteads located along tributary creeks (Shipek 1982). Each band was composed of 5 to 15 kinship groups (sibs or shiimul), some of which were divided among more than one band (Kroeber 1925). Approximately 50 to 75 named kinship groups were located throughout the entire Kumeyaay territory. Political organization varied between bands. Basic structure included a patrilineal band leader, or a Kwaaypaay, and at least one assistant who acted as a messenger (Luomala 1978, Shipek 1982). The primary roles of the Kwaaypaay were to direct ceremonies, act as a disciplinary head, advise on marriages and family differences, make war decisions, and to organize hunting and foraging expeditions.

The Kwaaypaay counseled with shaman on many important decisions. Ceremonies among the Kumeyaay are similar to those of other Southern California Native groups (Kroeber 1925). The ceremonial leader was an inherited religious position. Rituals conducted by ceremonial leaders included puberty rites, marriage, naming ceremonies, cremation of the dead, and the annual mourning ceremony (keruk) for all those of the sib who had died the previous year. Kumeyaay groups shared religious mythologies and belief in a higher creator-god (Shipek 1985). Kuuchama, or Tecate Peak, was the most sacred landmark, designated by the Kumeyaay god as the location for

acquiring power for good, healing, and peace. Other holy places recognized by all Kumeyaay include Wee'ishpa or Signal Mountain, Jacumba Peak, Mt. Woodson, Viejas Mountain, and other mountains near the Colorado River in the Desert Kumeyaay region (Shipek 1985, 1987).

Entire bands moved to winter villages in sheltered valleys near known sources of water. Dwellings in the relatively permanent winter villages were semi-subterranean and roughly circular with a wooden pole framework covered in brush thatch and a mat covering. They faced east to keep out the wind and ensure privacy (Luomala 1978). Other structures in the village consisted of family-owned platform granaries, a village-owned brush ceremonial enclosure, and sweat lodges. A semi-circular enclosure was used for the keruk mourning ceremony, and rock walls sometimes surrounded ceremonial and dance areas. At summer camps, ramadas and windbreaks were common and built into trees or rock shelters. Granaries and more permanent housing would sometimes be constructed in frequently visited oak groves in the hills and in the mountains of Kumeyaay territory.

Many Kumeyaay camped in coastal valleys at certain times of the year to gather coastal resources. Fish were caught with hooks, nets, and bows from tule boats. Shellfish were gathered from the sandy beaches (e.g., Chione, scallops, and Donax) and rocky shores (e.g., mussels and abalone). Common game birds included doves and quail; migratory birds included geese. A primary source of protein came from rabbits, woodrats, and other small game living along the mesas and foothills. Small mammals were caught using throwing sticks, bow and arrow, or in nets on community drives. Hunting large game such as deer and mountain sheep was the role of expert hunters trained in specialized hunting folklore (Luomala 1978). Land resources generally belonged to the bands with only a few areas considered "tribal" land and open to anyone (Shipek 1982). Water and stored foods were communally available to all band members on a reciprocal basis (Luomala 1978).

During the winter season, perennial herbs were collected in the valleys. Greens included miner's lettuce (*Claytonia perfoliata*), clover, pigweed (*Aramanthus* sp.), and other grasses. Seeds were harvested from buckwheat, chia and other salvias, and a variety of grasses. In the mountains and foothills, yucca was gathered for its stalks, flowers, and leaves. Elderberry, manzanita, cholla, prickly-pear opuntia cactus, and juniper shrubs provided berries and fruit. The acorns from several species of oak were a subsistence staple gathered during the late summer and stored in family and village granaries. At least six species of oaks provided acorns for the Kumeyaay in San Diego County (Luomala 1978).

Production of baskets, nets, and pottery were and remain a highly integral part of traditional lifeways. Their main use was tied to food procurement, production, and processing (Wallace 1978). High-quality baskets with a weave similar to other Southern California groups were unique on local and regional levels. The regional unity in basketry traditions is linked to the prominence of acorn processing. Beyond baskets, carrying nets and sacks were also used for food collection. Regularly manufactured ceramic vessels were used as water jars, for cooking and storage, and as cremation urns (Kroeber 1925).

Men and children wore utilitarian belt sashes and pouches designed to hold tools and small game. Women wore a one- or two-piece apron made of shredded bark and a round, twined cap. Robes of rabbit fur, willow bark, or deerskin were worn in the winter and also served as bedding. For long distance travel, sandals woven from agave fibers protected their feet (Luomala 1978). Special ceremonial costumes and adornment were worn during ceremonies. With the exception of boys and mourners, hair was worn long with bangs cut at the forehead.

Accounts by Spanish missionaries and Kumeyaay elders suggest that status differentiation was established during the Late Holocene but could possibly have been earlier (Shipek 1982). Socio-political structure was drastically disrupted by the introduction of Spanish, Mexican, and American policies and the subsequent depopulation from disease and drought (Shipek 1982).

3.2.3 Post-Contact Setting

The post-contact history of California is divided into three periods: the Spanish period (1769–1822), the Mexican period (1822–1848), and the American period (1848–present). These historical periods are described below.

Spanish Period (1769–1822)

The City of Escondido land was used by the local tribal communities for many years, they referred to the area as "Mixéelum Pompáwvo" (Kahn 2020). Juan Rodriguez Cabrillo, in 1542, led the first European expedition to observe present day Southern California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta (upper) California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968, Rolle 2003).

Gaspar de Portolá and Franciscan Father Junipero Serra established the first Spanish settlement in Alta California at Mission San Diego de Alcalá in 1769 which is located approximately 23 miles south of the Project Area. This was the first of 21 missions erected by the Spanish between 1769 and 1823. The area of modern-day Escondido was colonized by Juan Bautista de Anza in 1776. Juan Bautista de Anza referred to the area as "Rancho Rincon del Diablo"(City of Escondido n.d.).The Mission San Antonio de Pala (also known as San Antonio de Pala Asistencia or the Pala Mission) was founded in 1816 and is located approximately 17 miles northeast of the Project Area. The Mission San Diego de Alcalá and its associated presidio were built initially near the Kumeyaay village of Cosoy, near the present site of Old Town San Diego. However, the water supply at this location was low and the soil was not very fertile. Because of this, the Mission San Diego de Alcalá was moved in 1774 to its present location, near the Kumeyaay village of *Nipaguay* (Mission San Diego 2013, City of San Diego 2006). The Franciscan fathers similarly chose the site for the Mission San Antonio de Pala because it was a traditional gathering place and village for the Native American residents. The missions were responsible for administering to the local tribes and converting the population (Engelhardt 1927a). In 1775, a force of Kumeyaay surrounded Mission de Alcala and set fire to the structure and fought against the small contingent of Spanish guards (Carrico 1997). The revolt against the Spanish was likely the result of increased forced conversions, rape, theft of land, and forced imprisonment of Kumeyaay by the Spanish (Carrico 1997).

During the Mission period, Spain deeded ranchos to prominent citizens and soldiers, though very few in comparison to the following Mexican Period. Presidio commandants were given the authority to grant house lots and garden plots to soldiers and sometime after 1800, soldiers and their families began to move towards the base of Presidio Hill to receive land grants from the presidio commandants (City of San Diego 2006). Colonists used Native Americans as indentured servants to manage and expand their herds of cattle on these large ranchos (Engelhardt 1927b).

Mexican Period (1822–1848)

The Mexican period commenced when news of the success of the Mexican Revolution (1810–1821) against the Spanish crown reached California in 1822. This period was an era of extensive interior land grant development and exploration by American fur trappers west of the Sierra Nevada Mountains. The California missions declined in power and were ultimately secularized in 1834. By 1835, the presidio and Mission San Diego de Alcala had been abandoned and lay in ruins (City of San Diego 2006). Mission San Antonio de Pala was used as a chapel and granary until 1835 at which point government commissioners took control of the mission and associated buildings. Presently, Mission San Antonio de Pala is the only historic mission facility still serving a Mission Indian tribe (Hidden San Diego 2023). The hallmarks of the Mexican period were large ranchos deeded to prominent Mexican citizens, frequently soldiers, by the governor.

The Mexican government recognized the newly established Pueblo of San Diego in 1834. The pueblo did not fare as well as other California towns during the Mexican Period. Secularization of the missions caused increased hostilities by Native Americans against the *Californios* living in San Diego County during the late 1830s. Attacks on outlying ranchos and an unstable political and economic climate caused the pueblo's population to drop from approximately 500 to 150 permanent residents by 1840. In 1838, San Diego was demoted from pueblo status and made a subprefecture of the Los Angeles Pueblo (City of San Diego 2006).

American Period (1848–Present)

The American period in San Diego County began as early as 1846 when the United States (U.S.) military occupied San Diego and effectively ended *Californio* resistance in 1847. The American government assumed formal control of Alta California with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the U.S. agreed to pay Mexico $15 million for the territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming.

During the early American Period, cattle ranches dominated much of Southern California, although droughts and population growth resulted in farming and urban professions supplanting ranching through the late nineteenth century. After the U.S. took control of San Diego County in 1846, the political and economic situation stabilized, and population increased. The discovery of gold in Northern California in 1848 led to the California Gold Rush, which resulted in a massive population increase (Guinn 1977). By 1853, the population of California exceeded 300,000. Thousands of settlers and immigrants continued to pour into the state, particularly after the completion of the transcontinental railroad in 1869. By the 1880s, the railroads had established networks throughout Southern California, resulting in fast and affordable shipment of goods, as well as means to transport new residents (Dumke 1994).

Escondido

In 1886, the Escondido Land and Town Company acquired the land grant from Juan Bautista de Anza. The Escondido Land and Town company then developed the land into small farms to produce grapes and citrus. Escondido was officially incorporated in 1888 (City of Escondido n.d.).

During the late nineteenth century, Escondido witnessed the establishment of its first businesses and institutions. The arrival of the California Southern Railroad in 1883 facilitated trade and transportation, connecting Escondido to neighboring towns and cities. Agriculture, particularly citrus and avocados, became the backbone of the local economy, leading to the establishment of packing houses and canneries that processed and shipped produce across the country (Escondido History

Center 2019). In the early twentieth century, Escondido continued to flourish. The construction of the Lake Hodges Dam in 1918 provided a reliable water supply, fostering further agricultural expansion. The city's population grew, and essential infrastructure such as schools, hospitals, and parks were established to meet the needs of the community (Escondido History Center 2019). The mid-twentieth century brought significant changes to Escondido. The post-World War II boom, coupled with the expansion of transportation networks, led to urbanization and the development of residential neighborhoods. In the 1950s into the 1970s, the City of Escondido expanded north and west of the original city boundaries with construction of single and multifamily residential developments, large commercial strip malls, and auto-oriented commercial spaces with the construction of Interstate 15 and State Route 78 through the city (NETR Online 2025). The city's strategic location along Interstate 15 provided convenient access to San Diego and other major metropolitan areas, attracting businesses and industries. The area surrounding the Project Area developed during the 1970s with commercial and industrial properties including the Auto Park adjacent to the Project Area in 1977.

In recent decades, Escondido has embraced its identity as a diverse and culturally vibrant city. Efforts to preserve its historical landmarks and promote community engagement have been central to Escondido's growth. The California Center for the Arts, a cultural hub featuring theater, art galleries, and educational programs, has become a focal point for arts and entertainment in the region (Escondido History Center 2019). The city's commitment to sustainable development is evident in the Escondido General Plan, which outlines a vision for the future. The plan emphasizes responsible growth, environmental stewardship, and the preservation of open spaces (City of Escondido 2012).

Traditional Ranch Architectural Style

The commercial building at 2361 Auto Park Way within the Project Area where the Enterprise BESS facilities are proposed expresses minimal characteristics of the Traditional Ranch style, popular in the U.S. and California between 1935 and 1975. Though the style was largely applied to residential properties, some architects and builders applied the style to commercial and institutional properties for the buildings to appear compatible with a surrounding suburban environment (Horak et al. 2015).

Traditional Ranch style originated in Southern California in the mid-1930s, though the style was not widely popular in the 1940s due to the strict financial controls of the Federal Housing Administration financing guidelines during World War II (McAlester 2015). As financial controls lifted after World War II, the Traditional Ranch style gained popularity and was the most popular style in residential design during the 1950s and 1960s with some commercial examples expressing the style of the commercial property at 2361 Auto Park Way within the northern extent of the Project Area. The style was applied to individual properties as well as large suburban subdivisions. Traditional Ranch buildings typically expressed a broad one-story shape built low to the ground with a low-pitched roof without dormers and moderate to wide eave overhang (McAlester 2015). The entry is sheltered under the main roof of the building, and the façade is typically asymmetrical. A list of character-defining features is included below:

Character-Defining Features of the Traditional Ranch Style (Horak et al. 2015, McAlester 2015):

- Asymmetrical informal composition with one or more wings
- Asymmetrical front entry usually sheltered under main roof
- Brick or stone chimneys

- Close relationship to its yard
- Dutch doors
- Eaves with exposed rafter tails
- Low-pitched roof without dormers
- Exposed post and beam construction
- French doors
- Gabled roof, originally shingled
- One or two stories in height; broad low shape
- Large picture windows
- Shutters
- Sliding glass doors
- Two-story versions can include Monterey Colonial elements, including second-story balconies
- Typically designed by a well-known architect

4 Methods

This section presents the methods for each task completed during the preparation of this assessment.

4.1 Background and Archival Research

4.1.1 California Historical Resources Information System

Rincon conducted a cultural resources records search of the California Historical Resources Information System records using information obtained from the South Coastal Information Center (SCIC) at the University of San Diego, San Diego in May 2023 and February 2025. The search was performed to identify previously conducted cultural resources studies and previously recorded cultural resources within the Project Area and a 1-mile radius surrounding it. Results from the records search can be found in Appendix A of the confidential version of this report (this is a public version of the report that does not include Appendix A).

4.1.2 Background Research

As part of the background research for this Project, Rincon also reviewed the State Built Environment Resources Directory, NRHP, CRHR, California Historical Landmarks, California Points of Historic Interest, City of Escondido local register and list of local historic landmarks, and the California Office of Historic Preservation Archaeological Determinations of Eligibility.

Additionally, the following resources were reviewed:

- Google Earth imagery
- USGS topographic quadrangles accessed through NETR Online and USGS TopoViewer
- Aerial photographs dating to 1947, 1953, 1964, 1967, 1978, 1980-1991, 1993-2003, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020 accessed through NETR Online and the University of California, Santa Barbara Library FrameFinder
- San Diego County Assessor's Office
- Historical newspaper clippings obtained from Newspapers.com
- Various historical records via Ancestry.com

4.1.3 Native American Outreach

Rincon contacted the Native American Heritage Commission (NAHC) on April 18, 2023, to request a search of the SLF and a contact list of Native Americans culturally affiliated with the Project vicinity. An additional request was submitted to the NAHC on October 19, 2024, to address the updated Project Area. Appendix B provides documentation of Rincon's outreach effort to the NAHC.

4.2 Field Survey

On May 10, 2023, October 16, 2023, and October 12, 2024, Rincon archaeologist Rachel Bilchak, BA, conducted a pedestrian field survey of the entire 1.98-acre Project Area using transect intervals of 10 meters (Figure 4). Exposed ground surfaces were examined for artifacts (e.g., flaked stone tools,

tool-making debris, ground stone milling tools), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, and historic-period debris (e.g., metal, glass, ceramics). Surface scrapes were conducted to improve ground surface visibility and survey reliability, particularly within the area of direct impact and vicinity. Ground disturbances such as rodent burrows and drainages were also visually inspected. Survey accuracy was maintained using a handheld Global Positioning Satellite unit and a georeferenced map of the Project Area. Site characteristics and survey conditions were documented using field records and a digital camera. Copies of the survey notes and digital photographs are maintained at Rincon's San Diego office.

Under the direction of Rincon Architectural Historian Ashley Losco, Rachel Bilchak also conducted a built environment survey of the Project Area on October 12, 2024. Built environment resources within the Project Area, including buildings, structures, and associated features, were documented using digital photography. Pursuant to California Office of Historic Preservation Guidelines (California Office of Historic Preservation 1995: 2), properties over 45 years of age were evaluated for listing in the NRHP and the CRHR and recorded on California Department of Parks (DPR) 523 series forms.

5 Results

Results from the SCIC records search are described below. A complete list of resources and reports identified in the results, maps depicting their locations in the context of the Project Area, and copies of all resource records identified by the search can be found in Appendix A of the confidential version of this report (this is a public version of the report that does not include Appendix A).

5.1 Known Cultural Resources Studies

The SCIC records search identified 87 previous cultural studies within the 1-mile records search radius, three of which included portions of the Project Area. Of the three previously conducted studies, two are archaeological monitoring reports (SD-09250 and SD-11187) and one is an environmental impact report (SD-08588). These are discussed in further detail below.

5.1.1 SD-08588

In 1980, the City of Escondido prepared *Draft Program Environmental Impact Report (EIR) for the Expansion of Wastewater Treatment Facility.* The study was completed to examine the wastewater treatment and disposal for the City of Escondido. An archaeological site was discovered within the water treatment facility, but no further details were provided within the EIR (City of Escondido 1980). The study completely encompasses the current Project Area. No cultural resources were identified in the proposed Enterprise BESS Project Area.

5.1.2 SD-09250

In 2004, Brian F. Smith and Associates prepared a *Mitigation and Monitoring Report for the Escondido Research and Technology Center Project*. In addition to background research, the study included testing and evaluation of four prehistoric sites (SDI-16988, -16989, -16990, -17058). Resources SDI-16990 and SDI-17058 were recommended not significant with no adverse effect from the Project. Resources SDI-16988 and SDI-16989 were recommended as significant, and data recovery was considered an acceptable way to mitigate adverse effects of the Project. Artifacts recovered during the monitoring and testing phases of the Project were transferred to the San Luis Ray Band of Indians for permanent curations (Brian F. Smith and Associate 2004). None of the identified resources are located within the current Project Area.

5.1.3 SD-11187

In 2007, Brian F. Smith and Associates prepared *Results of the Cultural Resources Mitigation Monitoring Program for the Palomar Energy Project, Escondido, California*. At the time of this report, the information center could not provide a digitized copy; therefore, the findings of the report remain unknown (Pierson 2007).

5.2 Known Cultural Resources

The California Historical Resources Information System records search and background research identified 58 previously recorded cultural resources within 1 mile of the Project Area (Table 1). None of the 58 resources are located within the Project Area.

Table 1 Previously Recorded Cultural Resources within 1-Mile Records Search Area

Primary Number	Trinomial/ Temporary No.	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Eligibility Status	Relation to Project Area
P-37-000153	CA-SDI-000153	Insufficient data	Insufficient data	Insufficient data	Unknown	Outside
P-37-001035	CA-SDI-001035	Native American	Bedrock outcrop with oval metate	1962 (Unknown Author)	Unknown	Outside
P-37-005210	CA-SDI-005210	Native American	Bedrock milling slicks and flakes	1977 (Chase)	Unknown	Outside
P-37-005501	CA-SDI-005501	Native American	Bedrock milling slicks, fire affected rock, manos, cores, and flakes	1978 (Roth)	Unknown	Outside
P-37-005502	CA-SDI-005502	Native American	Milling slicks, oval basin, and mortar	1978 (Flower, Ike, and Roth)	Unknown	Outside
P-37-005503	CA-SDI-005503	Native American	Milling slicks, oval basins, and mortar	1978 (Flower, Ike, and Roth)	Unknown	Outside
P-37-005504	CA-SDI-005504	Native American	Milling slick and flake	1978 (Flower, Ike, and Roth)	Unknown	Outside
P-37-005505	CA-SDI-005505	Native American	Milling slicks, fire affected rock, and lithic flakes	1978 (Flower, Ike, and Roth)	Unknown	Outside
P-37-012046	CA-SDI-012046	Historical Structure	1945 Residence	1990 (Joyner)	Unknown	Outside
P-37-012209	CA-SDI-012209	Multi-Component Site	Prehistoric milling features, pictographs, and associated lithic material. Historical reservoir and residences.	1978 (Lenker) 1991 (Gallegos and Associates) 2001 (EDAW, Inc.) 2010 (Morgan and Clowery) 2016 (Stropes) 2018 (Brian F. Smith and Associates, Inc. and Stropes) 2018 (Accardy)	Determined eligible for CRHR	Outside
P-37-012528	CA-SDI-012528	Historical	Glass and ceramic fragments	1991 (ERCE)	Unknown	Outside
P-37-015576	CA-SDI-014325	Native American	Bedrock milling feature	1996 (Delman James, Rich Bark, Brian Glenn, Jerry Sabio, Ted Cooley, Ogden Environmental Services, Inc.); 2007 (D. Gallegos, M. Guerrero, Gallegos & Associates)	Recommended ineligible for CRHR	Outside
P-37-017512	CA-SDI-015351	Native American	Bedrock milling features and lithic flake	1999 (Tierra Environmental)	Unknown	Outside
P-37-017513	CA-SDI-015352	Multi-Component Site	Bedrock milling feature with historical glass and ceramic fragments	1999 (Tierra Environmental)	Unknown	Outside

Primary Number	Trinomial/ Temporary No.	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Eligibility Status	Relation to Project Area
P-37-017514		Native American Isolate	Quartz fragment	1999 (Tierra Environmental)	Unknown	Outside
P-37-017515		Native American Isolate	Metavolcanic flake	1999 (Tierra Environmental)	Unknown	Outside
P-37-017516		Historical Structure	1942 residence	1999 (Tierra Environmental)	Unknown	Outside
P-37-017517		Historical Structure	1928 structure	1999 (Tierra Environmental)	Unknown	Outside
P-37-017518		Historical Structure	Historical well and associated artifacts	1999 (Tierra Environmental)	Unknown	Outside
P-37-019436		Historical Structure	1930 commercial storefront	1983 (Donald A. Cotton Associates)	Unknown	Outside
P-37-019438		Historical Structure	1920 residence	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019439		Historical Structure	1920 residence	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019454		Historical Structure	1930 residence	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019526		Historical Structure	1900 barn	1983 (Donald A. Cotton Associates)	Unknown	Outside
P-37-019527		Historical Structure	1890 residence	1983 (Donald A. Cotton Associates)	Unknown	Outside
P-37-019528		Historical Structure	1920 commercial building	1983 (Donald A. Cotton Associates)	3D: Appears eligible for NRHP as a contributor to a NRHP eligible district through survey evaluation.	Outside
P-37-019529		Historical Structure	1890 residence	1983 (Donald A. Cotton Associates)	3D: Appears eligible for NRHP as a contributor to a NRHP eligible district through survey evaluation	Outside

Primary Number	Trinomial/ Temporary No.	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Eligibility Status	Relation to Project Area
P-37-019560		Historical Structure	1920 residence	1983 (Donald A. Cotton Associates)	3D: Appears eligible for NRHP as a contributor to a NRHP eligible district through survey evaluation	Outside
P-37-019561		Historical Structure	1930 commercial building and ancillary building	1983 (Donald A. Cotton Associates) 2002 (EDAW, Inc.)	7N: Needs to be reevaluated	Outside
P-37-019562		Historical Structure	1920 commercial building	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019563		Historical Structure	1930 industrial building	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019564		Historical Structure	1941 residence	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019565		Historical Structure	1941 residence	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019566		Historical Structure	1934 industrial building	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019567		Historical Structure	1920 commercial building	1983 (Donald A. Cotton Associates)	7N: Needs to be reevaluated	Outside
P-37-019700		Historical Structure	1940 barn	1983 (Donald A. Cotton Associates)	Not eligible	Outside
P-37-024452	CA-SDI-016222	Native American	Bedrock milling feature	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024453	CA-SDI-016223	Native American	Bedrock milling feature	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024454	CA-SDI-016224	Native American	Bedrock milling feature	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024455	CA-SDI-016225	Native American	Bedrock milling feature	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024456	CA-SDI-016226	Native American	Bedrock milling feature	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024457		Historical Isolate	Historical machinery, farming equipment	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024458		Historical Isolate	Historical machinery, farming equipment	2001 (EDAW, Inc.)	Unknown	Outside
P-37-024546		Historical Structure	1961 steel radio transmitting tower	2002 (EDAW, Inc)	Unknown	Outside

Primary Number	Trinomial/ Temporary No.	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Eligibility Status	Relation to Project Area
P-37-025575	CA-SDI-016988	Native American	Bedrock milling features and lithic scatter	2004 (Brian F. Smith & Associates)	Not evaluated for NRHP or CRHR	Outside
P-37-025576	CA-SDI-016989	Native American	Bedrock milling features and lithic scatter	2004 (Brian F. Smith & Associates)	Not Evaluated for NRHP or CRHR	Outside
P-37-025577	CA-SDI-016990	Native American	Lithic scatter	2004 (Brian F. Smith & Associates)	Not Evaluated for NRHP or CRHR	Outside
P-37-027269	CA-SDI-017838	Native American	Bedrock milling feature	2006 (Brian F. Smith & Associates)	Unknown	Outside
P-37-027270	CA-SDI-017839	Native American	Bedrock milling feature	2006 (Brian F. Smith & Associates)	Unknown	Outside
P-37-033557		Historical Site	Highway 395	2013 (Larry Tift, ASM Affiliates, Inc.); 2015 (Kent Manchen, Matt DeCarlo, ASM Affiliates, Inc.); 2017 (Haley Chateene, PanGIS); 2017 (A. Foglia, K. Keckeisen, PanGIS, Inc.); 2018 (Sarah Stringer-Bowsher, ASM Affiliates, Inc.)	Recommended ineligible	Outside
P-37-035964	CA-SDI-021907	Native American	Bedrock milling feature with associated artifacts	2016 (RECON)	Unknown	Outside
P-37-035965	CA-SDI-021908	Native American	Bedrock milling feature with associated artifacts	2016 (Price, RECON); 2018 (McLean, DeGiovine, RECON)	Unknown	Outside
P-37-039453		Historical Site	1948 historical road, Leora Lane	2020 (ECORP Consulting, Inc)	Recommended ineligible for NRHP	Outside
P-37-039454		Historical Site	1904 historical road, Montiel Road	2020 (ECORP Consulting, Inc)	Recommended ineligible for NRHP and CRHR	Outside
P-37-039455		Historical Site	1904 road, Nordahl Road	2020 (ECORP Consulting, Inc)	Recommended ineligible for NRHP and CRHR	Outside
P-37-039621		Historical Structure	1959 residence	2019 (RECON)	Recommended ineligible for NRHP and CRHR	Outside

Primary Number	Trinomial/ Temporary No.	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Eligibility Status	Relation to Project Area
P-37-039941		Historical Structure	1934 residence	2008 (EDAW)	Found ineligible for NRHP, CRHR or Local designation through survey evaluation.	Outside
P-37-039942		Historical Structure	1957 residence	2008 (EDAW)	Found ineligible for NRHP, CRHR or Local designation through survey evaluation	Outside

CRHR = California Register of Historical Resources; NRHP = National Register of Historic Places

Source: South Coastal Information Center 2023 and 2025

5.2.1 Background Research

Review of the Built Environment Resource Directory for San Diego County did not identify any properties within 1 mile of the Project Area which are designated in the NRHP or CRHR. A review of the NRHP/CRHR and other local historical databases was negative for listings within the 1-mile search radius of the Project Area.

5.2.2 Review of Historical Topographic Maps and Aerial Imagery

Rincon completed a review of historical topographic maps and aerial imagery to ascertain the development history of the Project Area. Topographic maps from 1893 to 1946 show the Project Area as generally undeveloped, bordered by an unpaved road to the east and the Southern California Railroad Escondido Branch to the north (NETR Online 2025). Aerials and topographic maps from 1947 to 1953 depict the Project Area as undeveloped and surrounded by agricultural properties; the railroad and an adjacent east-west trending paved road, now West Mission Road, are depicted north of the Project Area with a few buildings to the east (NETR Online 2025). Aerials and topographic maps from 1964 to 1967 show additional commercial development along West Mission Road, construction of State Route 78 to the north, and single-family residential properties to the north and east (NETR Online 2025). By 1978, an aerial photograph depicts extensive industrial and commercial construction south of West Mission Road along the newly constructed Auto Park Way including the construction of the commercial building within the Project Area. The aerial photograph also depicts the expansion of State Route 78 and construction of Interstate 15 to the east of the Project Area (NETR Online 2023). Aerial photographs and topographic maps from 1980 to 1989 depict the Project Area as it appeared in 1978; however, they also depict additional commercial development along Harmony Grove Road south of the Project Area (NETR Online 2025). Aerial photographs and topographic maps from 1990 to 2005 depict single and multifamily residential development north of the Project Area between State Route 78 and Interstate 15 (NETR Online 2025). Between 2005 and 2022, aerial photographs depict infill development in the surrounding area (NETR Online 2025).

5.2.3 Native American Outreach

A response from the NAHC was received on May 17, 2023, stating that the results of the SLF search were *negative*, meaning no tribal heritage resources within the vicinity of the Project Area are on record with the NAHC. A list of contact information for 23 individuals from 15 tribal groups in the region was provided. The NAHC responded to Rincon's supplemental SLF request on November 19, 2024, again stating the results of the search were *negative*. A list of contact information for 30 individuals from 17 tribal groups in the region was provided (see Appendix B).

5.3 Field Survey Results

5.3.1 Archaeological Resources

The following section summarizes the results of all background research and fieldwork as they pertain to archaeological resources that may qualify as historical resources. Rincon conducted a cultural resources pedestrian survey of the Project Area on May 10, 2023, October 16, 2023, and October 12, 2024 (Figure 4). The two initial surveys that were conducted on May 10, 2023, and October 16, 2023, encompassed the EEPP parcel within the current Project Area (Photograph 1 and

Photograph 2) and additional acreage to the West of the EEPP that is not included in the current Project Area.

A third survey was conducted on October 12, 2024, to include the addition of 1.25 acres to the Project Area located North of the EEPP. An auto-body shop is located within this portion of the Project Area and is discussed in more detail in the built environment resources section of the survey results below. Exposed ground surface visibility was poor (0 to 30 percent) throughout the Project Area, with paved surfaces, seasonal grasses, and a dense layer of pine duff typically obscuring views (Photograph 3, Photograph 4, Photograph 5, Photograph 6, and Photograph 7) Vegetation within the Project Area consists of pine trees, seasonal grasses, and decorative landscaping including palm trees and shrubbery. The dominant soil observed was vista coarse sandy loam. Modern trash was observed intermittently within the Project Area including a concentration of discarded camping materials at the base of the steep slope within the EEPP. Modern ground disturbances such as the installation of a sprinkler system and sewer system were observed throughout the survey area (Photograph 8).

No archaeological materials were identified in the Project Area during the pedestrian surveys completed for the Project.

5.3.2 Built Environment Resources

The following section summarizes the results of all background research and fieldwork as they pertain to built environment resources. The fieldwork and background research resulted in the identification of one historic-age property in the Project Area, 2361 Auto Park Way (Figure 5). The property was recorded and evaluated for the NRHP, CRHR, and local listing eligibility on DPR Series 523 forms, which are included in Appendix C and summarized below.

Figure 4 Survey Location Map

Imagery provided by Microsoft Bing and its licensors © 2025.

24-16971 CR
CRFig X Survey Map

Photograph 1 Overview of Switchyard/Interconnection Area on Northern Portion of EEPP Facility, View Looking South

Photograph 2 Northwest Portion of EEPP Facility, View North from West-Central Portion of Project Area

Photograph 3 Overview of Hillside in Northern Portion of EEPP Facility, View West from Northern Extent of EEPP Facility

Photograph 4 Overview of Central Portion of Project Area, View East from Hillside North of EEPP Facility where Aboveground Gen-tie on Cable Tray is Proposed

Photograph 5 Overview of Southeastern Portion of Project Area, View Northeast from Within EEPP Facility

Photograph 6 Overview of Central Portion of Project Area, View Southeast from Within EEPP Facility

Photograph 7 Overview of Central Portion of Project Area, View East from above Southern Extent of 2361 Auto Park Way

Photograph 8 Overview of Central Portion of Project Area, View North from Central Portion of Project Area

Figure 5 2361 Auto Park Way

Imagery provided by Microsoft Bing and its licensors © 2025.

24-16971 CR
CRFig X Parcels Surveyed and Study Area

2361 Auto Park Way

Physical Description

2361 Auto Park Way is a commercial property (subject property) on a 0.82-acre parcel occupied by a Traditional Ranch style commercial building and paved parking lot in Escondido, California. Currently occupied by buildings and facilities associated with a previous auto body shop business, Auto Art Collision Specialists, the approximately 7,200-square-foot commercial building was constructed in 1973 and sits at the southeast corner of the property with the paved parking lot to the west and landscaping to the north along Auto Park Way (Photograph 9). Auto Art Collision Specialists ceased operations at this location in January 2025 and the property is currently (March 2025) not in active use pending the proposed implementation of the Enterprise BESS Project at this location. The commercial building is one-story in height with an irregular plan sited on a concrete foundation. A storefront for customers sits along the street and is capped with a hipped roof clad in composition shingles with boxed overhanging eaves. The exterior north, west, and east elevations are clad in slump block (Photograph 10). The main entrance on the primary, north elevation sits at the center of the elevation and is recessed with a glazed door flanked by large sidelites. The fenestration throughout is aluminum-framed sliding sash windows.

The rear portion of the building is a repair shop constructed of steel framing and clad in sheets of corrugated metal. This portion of the building has a low-pitched side gable roof, and this portion of the building is slightly taller than the front, public-facing storefront. The west elevation has two openings towards the northern end of the elevation: an entrance with a flush metal door and a large opening for cars to enter the repair shop with a roll-up metal door (Photograph 11). A carport addition was constructed to the southern end of the west elevation between 1995 and 1996. Capped with a flat roof clad in sheets of corrugated metal, the carport is constructed of steel framing and enclosed with sheets of corrugated metal at the south elevation.

The east elevation of the rear repair shop has an open porch which spans the length of the elevation Photograph 12). The porch is capped by a flat roof clad in sheets of corrugated metal. The southern elevation of the rear repair shop has no architecture features, though two detached steel-framed carports sit south of the south elevation adjacent to the hillside. Constructed between 1995 and 1996, the carports are capped with side gable roofs and enclosed with sheets of corrugated metal at the north, south, and east elevations (Photograph 13).

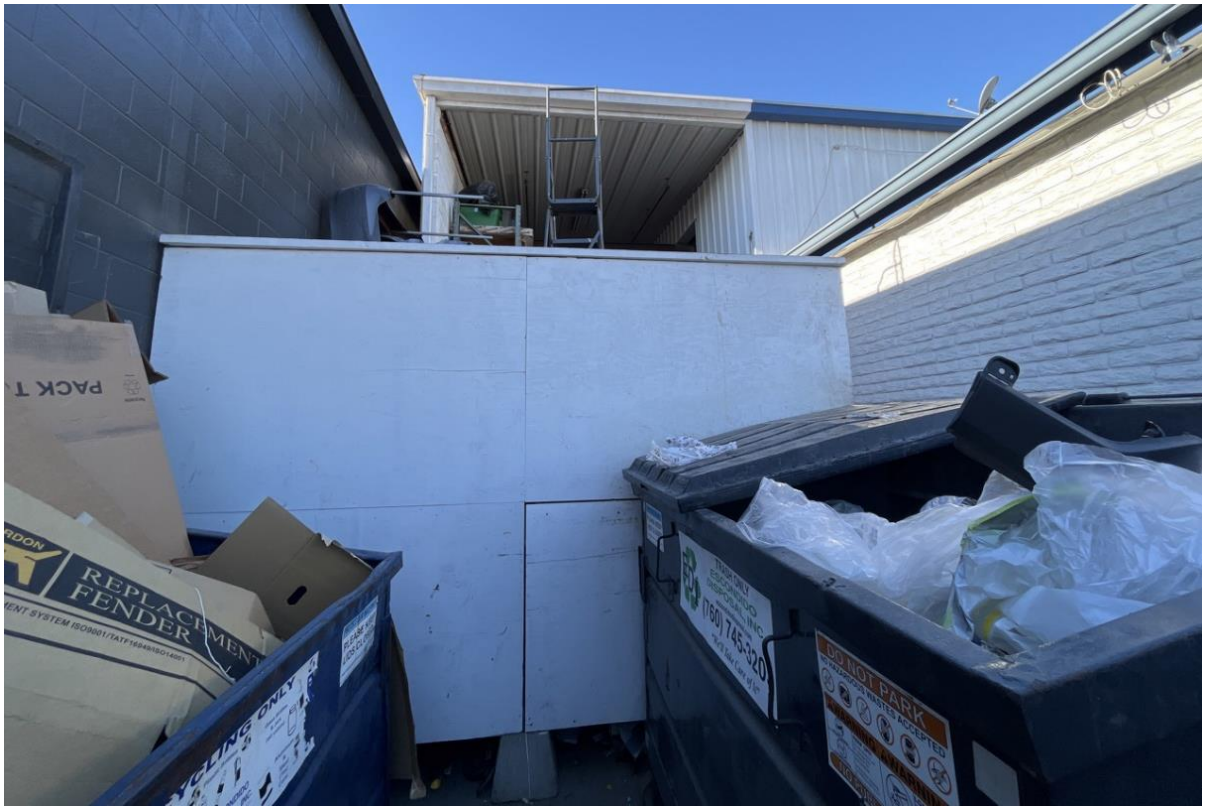
The front of the property has a wide setback along Auto Park Way and is landscaped with gravel, palm trees, and ornamental plants along with a flagpole and company sign. The western portion of the property is paved with concrete for a parking lot and accessible from Auto Park Way by a paved driveway. The parking lot is separated by the sidewalk by landscaping of gravel and small ornamental bushes. The building has some characteristics of the Traditional Ranch architectural style such as broad low one-story shape, hipped roof with wide eaves, and entry recessed under the main roof.

Photograph 9 2361 Auto Park Way North and West Elevations, View Southeast from Northwest Corner or Property

Photograph 10 2361 Auto Park Way North Elevation, View South from Front of Property

Photograph 11 2361 Auto Park Way West Elevation, View East from Western Edge of Property

Photograph 12 2361 Auto Park Way East Elevation, View South from Southeastern Corner of Property



Photograph 13 2361 Auto Park Way South Elevation, View Northeast from Northcentral Portion of Project Area

Property History

2361 Auto Park Way sits on the south side of Auto Park Way in the northwest portion of the City of Escondido. Before the 1960s, the area was rural and developed with agricultural properties; however, after World War II and the expansion of the suburbs and automobile use, the surrounding area developed with commercial and industrial properties. In 1971, Dr. Lionel and Marilyn Burton and Charles and Dorothy Helferich purchased the subject property (TRC Environmental Corporation 2025). In 1973, Tacoma Wheel Inc. leased the property from the owners and constructed the extant commercial building with the front commercial space and rear repair shop originally addressed as 2361 Vineyard Avenue (*Daily Times-Advocate* 1973a).

Since construction in 1973, the only identifiable alterations include the construction of the carport to the west elevation between 1995 and 1996 and the construction of the two detached carports along the south elevation between 1995 and 1996 (NETR Online 2025). Between 2009 and 2012, the owners replaced the original wood shingle roofing with composition shingles and replaced the front door (Google Street View 2009 and 2012).

Ownership and Occupancy History

As stated above, in 1971, Dr. Lionel and Marilyn Burton and Charles and Dorothy Helferich purchased the subject property (TRC Environmental Corporation 2025). Dr. Lionel Burton was born in Kansas City, Missouri in 1927 and moved to the San Marcos area in the 1950s. Dr. Burton was a physician at the Palomar Memorial Hospital and coach for San Marcos High School's football team in the 1960s (*Daily Times-Advocate* 1961, Ancestry.com 1965). In the 1970s, Dr. Burton served on the

San Marcos City Council and as mayor from 1973 to 1977 (*Daily Times-Advocate* 1973b). Dr. Burton and his wife lived in San Marcos until his death in 2021 (Ancestry.com 2025a). No additional information was identified for Mrs. Burton.

Born in Ohio in 1924, Charles Helferich moved to San Marcos, California in the 1950s, where he worked as a contractor (Ancestry.com 2025b, *Daily-Times Advocate* 1966). Mr. Helferich and Dr. Burton owned other properties together with their wives such as an apartment building at 331 Richmar Avenue (*Daily Times-Advocate* 1971). Based on Helferich's background, Mr. Helferich may have been the builder of the subject property, though no evidence was identified to substantiate the connection. Mr. Helferich constructed commercial, institutional, and single and multifamily residential properties throughout San Marcos until the 1980s. He passed away in 1994 (Ancestry.com 2025b).

In 2012, Neva L. Hartjen purchased the subject property and owns the property today. Several occupants occupied 2361 Auto Park Way between 1973 and the present. The full list of owners and occupants is included below in Table 2.

Table 2 Ownership and Occupancy History of 2361 Auto Park Way

Date	Name	Owner/Occupant	Source
1971	Dr. Lionel and Marilyn Burton; Charles and Dorothy Helferich	Owner	TCR Environmental Corporation 2025
1973	Tacoma Wheels Inc.	Occupant	*Daily Times-Advocate* 1973a
1976	Tacoma Wheel Inc. T Tors Ltd.	Occupant	TRC Environmental Corporation 2025
1977-1978	Mitchell Equipment Co.	Occupant	Daily Times-Advocate 1977 and 1978
1980	Maruyama Corp. of America	Occupant	TRC Environmental Corporation 2025
1981-1985	Western Agricultural Irrigation Co. Inc.	Occupant	Daily Times-Advocate 1981 and 1982
1991	Olsen Brad Construction Inc.	Occupant	TRC Environmental Corporation 2025
1995	Accurate Paint & Body	Occupant	TRC Environmental Corporation 2025
1995	Auto Art Paint & Body	Occupant	TRC Environmental Corporation 2025
2000-2006	Accurate Auto Sales	Occupant	TRC Environmental Corporation 2025
2012	Neva L. Hartjen	Owner	TRC Environmental Corporation 2025
2010-2017	Auto Art Collision Specialists	Occupant	TRC Environmental Corporation 2025
2020-2025	Accurate Auto Sales	Occupant	TRC Environmental Corporation 2025; Google Street View 2024
2025-Present	Enterprise BESS LLC	Occupant	TRC Environmental Corporation 2025

Historic Resources Evaluation

This DPR form recorded and evaluated 2361 Auto Park Way for listing in the NRHP, CRHR, and for local listing as a City of Escondido Landmark. The resource is recommended not eligible for listing in the NRHP and CRHR under all criteria (Criteria A/1, B/2, C/3, and D/4) and as a local landmark and for listing to the local register under all criteria (Criteria 1 through 13).

NRHP AND CRHR HISTORICAL RESOURCES EVALUATION

Due to their geographic relevancy and applicability to the subject property, the current evaluation relied on the context provided in the following documents to support evaluation of the subject

property: *City of Escondido Context Statement*, prepared by the City of Escondido and *The Ranch House, 1930-1975,* prepared by ARG and ICF International as part of SurveyLA, Los Angeles Citywide Historic context Statement, in 2015. Constructed in 1973, 2361 Auto Park Way was constructed at the tail-end of post-World War II expansion of Escondido outside the city's original boundaries. Research did not identify that the property significantly contributed to Escondido's post-World War II expansion. According to National Register Bulletin 15 from the NPS, mere association with a historic trend does not qualify under Criterion A/1 (NPS 1995). Therefore, the subject property is recommended not eligible for listing in the NRHP and CRHR under Criterion A/1.

Dr. Lionel Burton and Mr. Charles Helferich and their wives owned the subject property between 1971 and 2012. Both men moved to the San Marcos area in the 1950s to 1960s and were active within the community. Though Dr. Burton played a large role in the San Marcos community, serving on City Council and as Mayor, coaching the high school football team, and working as a local doctor, research did not identify Dr. Burton played a significant role in the City of Escondido where the property is located nor a significant role at the state or national level. The property was simply owned by Dr. Burton, likely as an investment property, and was not directly associated with his work in the City of San Marcos. As stated under Criterion A/1, mere association with an individual does not qualify for listing in the NRHP or CRHR (NPS 1995). Research also did not identify Mr. Helferich as significant in local, state, and national history. Therefore, 2361 Auto Park Way is recommended not eligible for listing in the NRHP and CRHR under Criterion B/2.

Constructed in 1973, 2361 Auto Park Way has minimal elements of the Traditional Ranch architectural style including an asymmetrical informal composition, one-story low to the ground form, and a gabled roof with moderate eave overhang. Despite possessing the basic elements of the style, the building does not express the elaborate details or architectural elaborations to set it apart from other examples such as an entry located off-center, large picture windows, shutters, Dutch doors, exposed post and beam construction, or designs by a well-known architect (Horak et al. 2015, McAlester 2015). Additionally, owners and tenants have removed original materials, such as the replacement of wood roof shingles with composition shingles and replacement of the front door by 2012. Even more, the Traditional Ranch style is most significantly applied to residential properties, not commercial properties (Horak et al. 2015). As a result of missing materials and lack of architectural elaborations, 2361 Auto Park Way is not an exceptional example of the Traditional Ranch style.

Research through Newspapers.com, available city records, and other sources did not identify the contractor or architect of the subject property. Based on his background, Mr. Helferich may have constructed the subject property, but research did not identify a direct connection. Despite the lack of evidence, the subject property is not an exceptional example of Mr. Helferich's body of work nor does his body of work qualify him as a master contractor in San Marcos. Furthermore, the subject property does not have artistic value; therefore, the subject property is recommended not eligible for listing in the NRHP and CRHR under Criterion C/3.

2361 Auto Park Way is not likely to yield valuable information that would contribute to our understanding of human history, because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century Traditional Ranch commercial buildings. Therefore, the subject property is recommended not eligible for listing in the NRHP and CRHR under Criterion D/4.

CITY OF ESCONDIDO LOCAL LANDMARK AND LOCAL REGISTER EVALUATION

Dr. Lionel Burton played a role in the City of San Marcos but did not significantly contribute to the culture, history, prehistory, or development of the City of Escondido. He merely owned a property within the City of Escondido, but research did not identify how he contributed to the city's development. Therefore, 2361 Auto Park Way is recommended not eligible as a local landmark and for listing to the local register under Criterion 1.

As stated above, the commercial building on the subject property is not a significant example of the Traditional Ranch architectural style as it lacks detailed architectural elaborations and original materials, such as the wood shingle roofing and front door which were removed in 2012. The builder and architect of the building were not identified during research, and no information was identified to contribute the property's construction to Mr. Helferich. Therefore, 2361 Auto Park Way is recommended not eligible as a local landmark and for listing to the local register under Criterion 2. Also, the property is not one of the few remaining examples in the city possessing distinguishing characteristics of the Traditional Ranch style. Most of the post-World War II development in Escondido was constructed with elements of the Traditional Ranch style such as the residences on Avenida Del Diablo or Brooks Glen; therefore, it is recommended not eligible as a local landmark and for listing to the local register under Criterion 7. Lastly, the property is not exemplary of technology, craftsmanship or design of the period when it was constructed nor does it use historical sign materials; it is recommended not eligible as a local landmark and for listing to the local register under Criteria 8, 9, and 10.

Several tenants occupied the property between 1973 and January 2025; refer to Table 2 for additional details. Research did not identify that any of the businesses significantly impacted the City of Escondido nor that any of the businesses are now considered rare. All are typical establishments found within a city such as an auto body repair shop or equipment sales company. Therefore, the subject property is recommended not eligible as a local landmark and for listing to the local register under Criterion 3.

Research through Newspapers.com, Ancestry.com, and the City of Escondido Historic Context Statement, did not identify that the property was the site of a significant historical event. It is recommended not eligible as a local landmark and for listing to the local register under Criterion 4.

2361 Auto Park Way is 50 years old, but it is not historically significant within the City of Escondido. Mere age does not make a resource historically eligible; therefore, it is recommended not eligible as a local landmark and for listing to the local register under Criterion 5.

The subject property is not an important key focal point in the visual quality or character of a neighborhood, street, area or district. It is recommended not eligible as a local landmark and for listing to the local register under Criterion 6.

The subject property is not a landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities, nor is it an archaeological site that has yielded, or may be likely to yield, information important in prehistory. 2361 Auto Park Way is recommended not eligible as a local landmark and for listing to the local register under Criteria 11 and 12.

Lastly, 2361 Auto Park Way does not have an outstanding rating of the criteria used to evaluate local register requests. 2361 Auto Park Way is recommended not eligible as a local landmark and for listing to the local register under Criterion 13.

6 Findings and Recommendations

The impact analysis included here is organized based on the cultural resources thresholds included in *CEQA Guidelines* Appendix G: Environmental Checklist Form:

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Threshold A broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, we have chosen to limit analysis under Threshold A to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold B.

6.1 Historical Built Environment Resources

The field survey and background research identified one historic age property in the Project Area, 2361 Auto Park Way. As detailed above in Section 5.3, the property is recommended not eligible for federal, state, and local designation due to a lack of historic significance or architectural merit. 2361 Auto Park Way is not considered a historical resource under the CRHR; therefore, the project would result in ***no impact to historical resources*** pursuant to CRHR criteria.

6.2 Historical and Unique Archaeological Resources

The cultural resources records search identified 58 previously recorded cultural resources within the 1-mile records search radius. None of the cultural resources were located within or adjacent to the Project Area.

A review of historical aerial photographs and assessor data indicates that a majority of the proposed Project Area has been subject to ground disturbances including land clearing, plowing, and tilling, as well as development of adjacent land and construction of roads since the 1950s. Soils in the Project Area have been previously disturbed as a result of previous grading activities associated with the construction of the existing facility, as well as from the construction of the adjacent commercial and industrial buildings, and access roads.

The pedestrian survey conducted for the Project identified no archaeological resources within the Project Area. Due to the disturbed nature of the Project Area and the non-alluvial soils, there is a ***low risk*** of encountering subsurface archaeological deposits.

Therefore, the Conditions of Certification (CUL-1) for the original certification is considered sufficient for the current amendment. Based on consultation with Enterprise BESS LLC, the applicant has committed to incorporating the CUL-1 measures into the proposed Project in order to protect potentially present archaeological resources and human remains as presented below.

6.3 CUL-1

The Project certified under this emergency process shall not cause any significant impact to any cultural resources. No on-site cultural resource monitoring is required for this Project. In the event of an inadvertent cultural discovery the following mitigation measure must be followed:

- All work within 100 feet of the suspected cultural material must halt, and a qualified Cultural Resource Specialist shall be contacted immediately to evaluate the significance of the find. The Project Manager, Construction Manager, and the Compliance Project Manager shall be notified if the resource is judged to be potentially significant, and the archaeologist may recommend further study.
- In the event that suspected human remains are encountered, work must stop immediately within a radius of 100 feet (30 meters) of the discovery, and the San Diego County Coroner's Office shall be notified within 24 hours of the find. If the skeletal remains are determined to be prehistoric, the Coroner's Office shall contact the Native American Heritage Commission to identify the Most Likely Descendant. The Most Likely Descendant shall be notified and determine the most appropriate disposition of the remains and any associated artifacts.

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~~Appendix A~~

Appendix A has been redacted from this version of the report for confidentiality purposes

Appendix B

Native American Heritage Commission Sacred Land Files Search Results

Local Government Tribal Consultation List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Type of List Requested

■ **CEQA Tribal Consultation List (AB 52)** – ***Per Public Resources Code § 21080.3.1, subs. (b), (d), (e) and 21080.3.2***

☐ **General Plan (SB 18)** - ***Per Government Code § 65352.3.***

Local Action Type:

___ **General Plan** ___ **General Plan Element** ___ **General Plan Amendment**

___ **Specific Plan** ___ **Specific Plan Amendment** ___ **Pre-planning Outreach Activity**

Required Information

Project Title: Enterprise BESS Project (23-15565)

Local Government/Lead Agency: California Energy Commission

Contact Person: Rachel Bilchak (on behalf of the lead agency)

Street Address: 8825 Aero Drive, Suite 120

City: San Diego **Zip:** 92123

Phone: 408-396-7264 **Fax:** N/A

Email: rbilchak@rinconconsultants.com

Specific Area Subject to Proposed Action

County: San Diego **City/Community:** Escondido

Project Description:

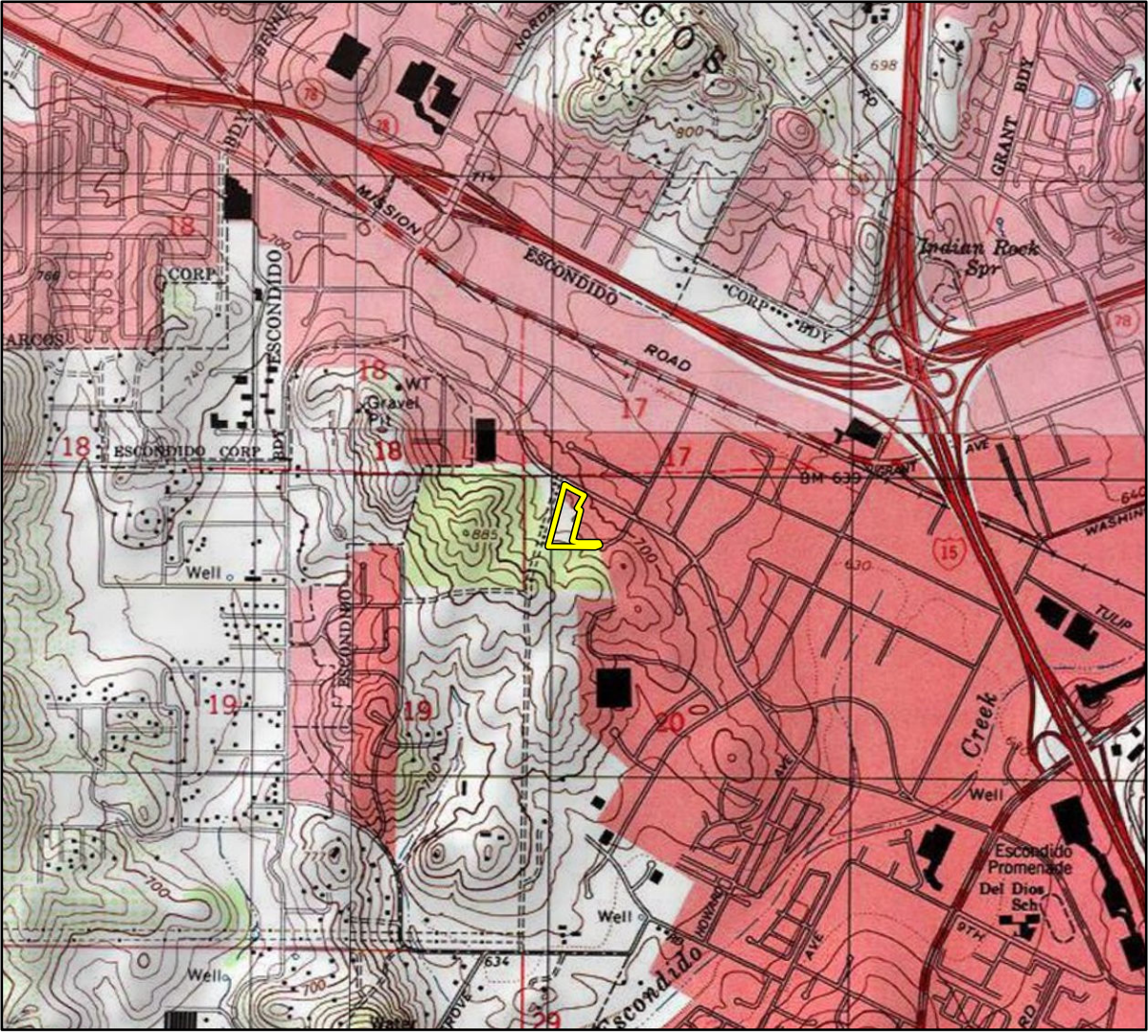
Enterprise BESS LLC proposes to construct and operate the Enterprise BESS project at the existing Enterprise Emergency Peaker Project (EEPP) property and on three adjacent parcels to the north in Escondido, California. The EEPP site address is 201 Enterprise Street, Escondido, California. Assessor's Parcel Number (APN) for the EEPP site is APN 232-410-45-00. In summary, the modifications include: (1) moving the BESS facilities from the southern portion of the EEPP site to the three parcels to the north between Auto Park Way and the northern boundary of the EEPP site; (2) demolition of the auto body business buildings on the northern parcels; (3) construction of a gen-tie between the northern BESS facility and the EEPP switchgear/generation step up (GSU) transformer to the south; and (3) construction of new elevated switchgear facility on the northern portion of the EEPP site.

Additional Request

■ **Sacred Lands File Search** - ***Required Information:***

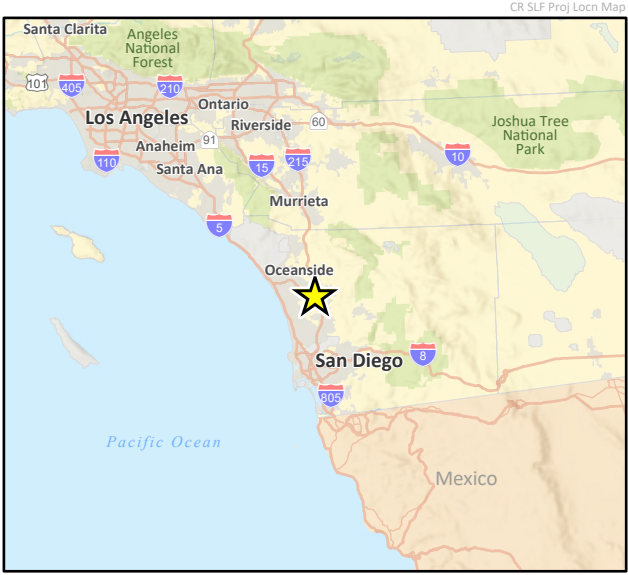
USGS Quadrangle Name(s): Escondido

Township: 12S **Range:** 02W **Section(s):** 20



Basemap provided by National Geographic Society, Esri and their licensors © 2024. Escondido Quadrangle. T12S R02W S20. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

23-15565 CR
CR SLF Proj Locn Map



Project Location

0 1,000 2,000 Feet

N

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

November 19, 2024

Rachel Bilchak
Rincon Consultants, Inc.

Via Email to: rbilchak@rinconconsultants.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Enterprise BESS Project, San Diego County

To Whom It May Concern:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
11/19/2024

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Barona Group of the Capitan Grande	F	Art Bunce, Attorney		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial,San Diego	7/25/2023
Campo Band of Diegueno Mission Indians	F	Marcus Cuero, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		marcuscuero@campo-nsn.gov	Diegueno	Imperial,San Diego	5/15/2024
Campo Band of Diegueno Mission Indians	F	Ben Dyche, Vice Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		bdyche@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Campo Band of Diegueno Mission Indians	F	Daniel Tsosie, THPO	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 760-6480		dtsosie@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Ewiiaapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial,San Diego	
Ewiiaapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial,San Diego	
Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		clint@redtailenvironmental.com	Diegueno	Imperial,San Diego	11/30/2023
Inaja-Cosmit Band of Indians	F	Rebecca Osuna, Chairperson	2005 S. Escondido Blvd. Escondido, CA, 92025	(760) 737-7628	(760) 747-8568		Diegueno	Imperial,San Diego	
Jamul Indian Village	F	Erica Pinto, Chairperson	P.O. Box 612 Jamul, CA, 91935	(619) 669-4785	(619) 669-4817	epinto@jiv-nsn.gov	Diegueno	Imperial,San Diego	
Jamul Indian Village	F	Lisa Cumper, Tribal Historic Preservation Officer	P.O. Box 612 Jamul, CA, 91935	(619) 669-4855		lcumper@jiv-nsn.gov	Diegueno	Imperial,San Diego	9/5/2018
La Posta Band of Diegueno Mission Indians	F	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial,San Diego	
Manzanita Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial,San Diego	
Mesa Grande Band of Diegueno Mission Indians	F	Michael Linton, Chairperson	P.O Box 270 Santa Ysabel, CA, 92070	(760) 782-3818	(760) 782-9092		Diegueno	Imperial,San Diego	
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537		awallick@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564		cnejo@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515		sgaughen@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pechanga Band of Indians	F	Steve Bodmer, General Counsel for Pechanga Band of Indians	P.O. Box 1477 Temecula, CA, 92593	(951) 770-6171	(951) 695-1778	sbodmer@pechanga-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	8/2/2023
Pechanga Band of Indians	F	Tuba Ebru Ozdil, Pechanga Cultural Analyst	P.O. Box 2183 Temecula, CA, 92593	(951) 770-6313	(951) 695-1778	eozdil@pechanga-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	8/2/2023
Rincon Band of Luiseno Indians	F	Cheryl Madrigal, Cultural Resources Manager/Tribal Historic Preservation Officer	One Government Center Lane Valley Center, CA, 92082	(760) 648-3000		cmadrigal@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
Rincon Band of Luiseno Indians	F	Denise Turner Walsh, Attorney General	One Government Center Lane Valley Center, CA, 92082	(760) 689-5727		dwalsh@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	7/7/2023
Rincon Band of Luiseno Indians	F	Joseph Linton, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 803-3548		jlinton@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
Rincon Band of Luiseno Indians	F	Laurie Gonzalez, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 484-4835		lgonzalez@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
San Luis Rey Band of Mission Indians	N	Carmen Mojado, Secretary of Goverment Affairs	1889 Sunset Drive Vista, CA, 92083	(760) 724-8505	(760) 724-2172	cjmojado@slrmissionindians.org	Luiseno	Orange,Riverside,San Diego	4/15/2024
San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876		Diegueno	Imperial,San Diego	
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Sycuan Band of the Kumeyaay Nation	F	Cody Martinez, Chairman	Sycuan Tribal Office: 1 Kwaaypaay Court El Cajon, CA, 92019	(619) 445-2613		cmartinez@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Sycuan Band of the Kumeyaay Nation	F	Bernice Paipa, Cultural Resource Specialist	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019	(619) 445-6917		bpaipa2@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Viejas Band of Kumeyaay Indians	F	Ernest Pingleton, THPO	1 Viejas Grade Road Alpine, CA, 91901	(619) 445-3810		epingleton@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023
Viejas Band of Kumeyaay Indians	F	Ray Teran, Resource Management Director	1 Viejas Grade Road Alpine, CA, 91901	(619) 659-2312		rteran@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Enterprise BESS Project, San Diego County.

Record: PROJ-2024-006015
Report Type: AB52 GIS
Counties: San Diego
NAHC Group: All

Sacred Lands File & Native American Contacts List Request

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd, Suite 100
Sacramento, CA 95814
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Enterprise BESS Project. Rincon Project No. 22-13968

County: San Diego

USGS Quadrangle Names: Escondido Quadrangle

Township/Range/Section: T12S / R02W / S20

Company/Firm/Agency: Rincon Consultants, Inc.

Contact Person: Mark Strother

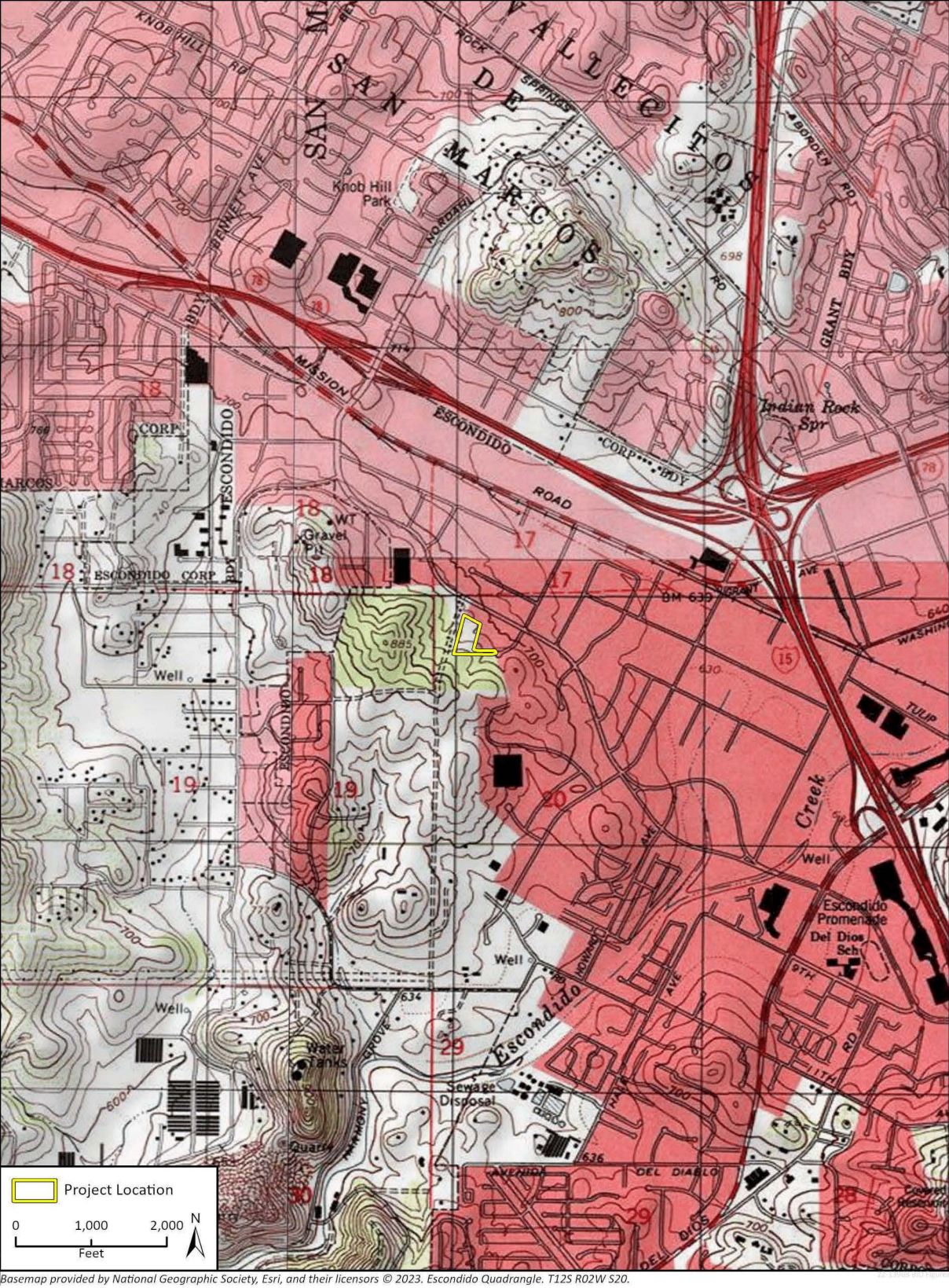
Street Address: 8825 Aero Drive

City: San Diego Zip: 92123

Phone: (760) 918-9444 extension 2047

Email: mstrother@rinconconsultants.com

Project Description: Rincon understands that Enterprise BESS LLC proposes to construct and operate the Palladium BESS project at the existing Enterprise Emergency Peaker Project (EEPP) property in Escondido, California. The site address is 201 Enterprise Street, Escondido, California. Assessor's Parcel Number (APN) for the site is APN 232-410-45-00



Basemap provided by National Geographic Society, Esri, and their licensors © 2023. Escondido Quadrangle. T12S R02W S20.
The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

May 17, 2023

Mark Strother
Rincon Consultants, Inc.

Via Email to: mstrother@rinconconsultants.com

Re: BESS Project, San Diego County

Dear Mr. Strother:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
5/17/2023

Barona Group of the Capitan Grande
Raymond Welch, Chairperson
1095 Barona Road Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
counciloffice@barona-nsn.gov

Campo Band of Diegueno Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 933 - 2200
Fax: (619) 445-9126
michaelg@leaningrock.net

Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 368 - 4382
Fax: (619) 445-9126
ceo@ebki-nsn.gov

Iipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 803 - 5694
clint@redtailenvironmental.com

Iipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 765 - 0845
Fax: (760) 765-0320

Inaja-Cosmit Band of Indians
Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village
Erica Pinto, Chairperson
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Jamul Indian Village
Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas,
P.O. Box 775 Kwaaymii
Pine Valley, CA, 91962 Diegueno
Phone: (619) 709 - 4207

La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

La Posta Band of Diegueno Mission Indians
Javaughn Miller, Tribal Administrator
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed BESS Project, San Diego County.

Native American Heritage Commission
Native American Contact List
San Diego County
5/17/2023

Manzanita Band of Kumeyaay Nation
Angela Elliott Santos, Chairperson
P.O. Box 1302 — Diegueno
Boulevard, CA, 91905
Phone: (619) 766 - 4930
Fax: (619) 766-4957

Mesa Grande Band of Diegueno Mission Indians
Michael Linton, Chairperson
P.O Box 270 — Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 782 - 3818
Fax: (760) 782-9092
mesagrandeband@msn.com

Pala Band of Mission Indians
Alexis Wallick, Assistant THPO
PMB 50, 35008 Pala Temecula Road — Cupeno, Luiseno
Pala, CA, 92059
Phone: (760) 891 - 3537
awallick@palatribe.com

Pala Band of Mission Indians
Shasta Gaughen, Tribal Historic Preservation Officer
PMB 50, 35008 Pala Temecula Road — Cupeno, Luiseno
Pala, CA, 92059
Phone: (760) 891 - 3515
Fax: (760) 742-3189
sgaughen@palatribe.com

Pechanga Band of Indians
Mark Macarro, Chairperson
P.O. Box 1477 — Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6000
Fax: (951) 695-1778
epreston@pechanga-nsn.gov

Pechanga Band of Indians
Paul Macarro, Cultural Resources Coordinator
P.O. Box 1477 — Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6306
Fax: (951) 506-9491
pmacarro@pechanga-nsn.gov

Rincon Band of Luiseno Indians
Bo Mazzetti, Chairperson
One Government Center Lane — Luiseno
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
bomazzetti@aol.com

Rincon Band of Luiseno Indians
Cheryl Madrigal, Tribal Historic Preservation Officer
One Government Center Lane — Luiseno
Valley Center, CA, 92082
Phone: (760) 297 - 2635
crd@rincon-nsn.gov

San Luis Rey Band of Mission Indians
San Luis Rey, Tribal Council
1889 Sunset Drive — Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

San Luis Rey Band of Mission Indians
1889 Sunset Drive — Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

San Pasqual Band of Diegueno Mission Indians
John Flores, Environmental Coordinator
P. O. Box 365 — Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
johnf@sanpasqualtribe.org

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed BESS Project, San Diego County.

Native American Heritage Commission
Native American Contact List
San Diego County
5/17/2023

San Pasqual Band of Diegueno Mission Indians
Allen Lawson, Chairperson
P.O. Box 365 — Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
allenl@sanpasqualtribe.org

Soboba Band of Luiseno Indians
Isaiah Vivanco, Chairperson
P. O. Box 487 — Cahuilla
San Jacinto, CA, 92581 — Luiseno
Phone: (951) 654 - 5544
Fax: (951) 654-4198
ivivanco@soboba-nsn.gov

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 — Cahuilla
San Jacinto, CA, 92581 — Luiseno
Phone: (951) 663 - 5279
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

Sycuan Band of the Kumeyaay Nation
Cody Martinez, Chairperson
1 Kwaaypaay Court — Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 2613
Fax: (619) 445-1927
ssilva@sycuan-nsn.gov

Sycuan Band of the Kumeyaay Nation
Kristie Orosco, Kumeyaay Resource Specialist
1 Kwaaypaay Court — Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

Viejas Band of Kumeyaay Indians
John Christman, Chairperson
1 Viejas Grade Road — Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

Viejas Band of Kumeyaay Indians
Ernest Pingleton, Tribal Historic Officer, Resource Management
1 Viejas Grade Road — Diegueno
Alpine, CA, 91901
Phone: (619) 659 - 2314
epingleton@viejas-nsn.gov

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed BESS Project, San Diego County.

Appendix C

California Department of Parks and Recreation 523 Series Forms

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code

Other Listings
Review Code Reviewer Date

 ***Resource Name or #:** 2361 Auto Park Way

P1. Other Identifier: N/A

*P2. **Location:** ☐ **Not for Publication** ☒ **Unrestricted**

*a. **County** San Diego **and**

*b. **USGS 7.5' Quad** *Escondido, Calif.* **Date** 1996 **T** 12S; **R** 02W; **Sec** 20 S.B.B.M

c. Address 2361 Auto Park Way City Escondido Zip 92029

d. UTM: Zone 11S, 489096.74 mE/ 3664940.03 mN

e. Other Locational Data: San Diego County Assessor's Parcel Numbers 232-410-21, 232-410-20, and 232-410-19

***P3a. Description:** The recorded resource is 2361 Auto Park Way, a commercial property (subject property) on a 0.82-acre parcel occupied by a Traditional Ranch style commercial building and paved parking lot in Escondido, California. Currently occupied by an auto body shop, Auto Art Collision Specialists, the approximately 7,200-square foot commercial building was constructed in 1973 and sits at the southeast corner of the property with the paved parking lot to the west and landscaping to the north along Auto Park Way (Photograph 1). The commercial building is one-story in height with an irregular plan sited on a concrete foundation. A storefront for customers sits along the street and is capped with a hipped roof clad in composition shingles with boxed overhanging eaves. The exterior north, west, and east elevations are clad in slump block (Photograph 2). The main entrance on the primary, north elevation sits at the center of the elevation and is recessed with a glazed door flanked by large sidelites. The fenestration throughout is aluminum-framed sliding sash windows. (*Continued on the Continuation Sheet*).

***P3b. Resource Attributes:** HP6. 1-3 Story Commercial Building

***P4. Resources Present:** ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other

P5a. Photograph or Drawing

P5b. Description of Photo:
Photograph 1: 2361 Auto Park Way North and West Elevations, View Southeast.

P6. Date Constructed/Age and Source: ☒ Historic ☐ Prehistoric ☐ Both
1973 (*Daily Times-Advocate* 1973a)

***P7. Owner and Address:**
Neva L. Hartjen Living Trust
P.O. Box 1748
San Marcos, California 92079

***P8. Recorded by:**
Rachel Bilchak
Rincon Consultants, Inc.
8825 Aero Drive, Suite 120
San Diego, California 92123

***P9. Date Recorded:** October 12, 2024

***P10. Survey Type:** Intensive

***P11. Report Citation**: Rincon Consultants, Inc. 2025. *Cultural Resources Technical Report for the Enterprise Battery Energy Storage Systems Project.* Rincon Consultants, Inc., Project No. 24-16971. Report on file at the South Coastal Information Center, San Diego State University, California.

***Attachments:** ☐ NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐Sketch Map ☐Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

***NRHP Status Code** 6Z
***Resource Name or #** 2361 Auto Park Way

B1. Historic Name: 2361 Vineyard Avenue; Tacoma Wheels Inc.
B2. Common Name: 2361 Auto Park Way; Auto Art Collision Specialists
B3. Original Use: Commercial
B4. Present Use: Commercial
***B5. Architectural Style:** Traditional Ranch
***B6. Construction History:**
- 1973 – Construction of commercial building and parking lot (*Daily Times-Advocate* 1973a)
- Between 1995 and 1996 – Addition of west elevation carport and construction of detached south elevation carports (NETR Online 2025)
- Between 2009 and 2012 - Removal of wood shingle roofing and replacement with composition shingle roofing and replacement of front door (Google Street View 2009 and 2012)

***B7. Moved?** ☒**No** ☐**Yes** ☐**Unknown** **Date:** N/A **Original Location:** N/A

***B8. Related Features:** N/A

B9a. Architect: Not Identified b. Builder: Not Identified
***B10. Significance:** **Theme** Commercial Development of Escondido **Area:** City of Escondido
Period of Significance N/A **Property Type** Commercial **Applicable Criteria** N/A

Historic Context

Escondido

In 1886, the Escondido Land and Town Company acquired the land grant from Juan Bautista de Anza. The Escondido Land and Town Company then developed the land into small farms to produce grapes and citrus. Escondido was officially incorporated in 1888 (City of Escondido n.d.).

During the late 19th century, Escondido witnessed the establishment of its first businesses and institutions. The arrival of the California Southern Railroad in 1883 facilitated trade and transportation, connecting Escondido to neighboring towns and cities. Agriculture, particularly citrus and avocados, became the backbone of the local economy, leading to the establishment of packing houses and canneries that processed and shipped produce across the country (Escondido History Center 2019). In the early 20th century, Escondido continued to flourish. The construction of Lake Hodges Dam in 1918 provided a reliable water supply, fostering further agricultural expansion. The city's population grew, and essential infrastructure such as schools, hospitals, and parks were established to meet the needs of the community (Escondido History Center 2019).

The mid-20th century brought significant changes to Escondido. The post-World War II boom, coupled with the expansion of transportation networks, led to urbanization and the development of residential neighborhoods. From the 1950s into the 1970s, the city of Escondido expanded north and west of the original city boundaries with construction of single- and multi-family residential developments, large commercial strip malls, and auto-oriented commercial spaces with the construction of Interstate 15 and State Route 78 through the city (NETR Online 2025). The expansion of Interstate 15 through San Diego County allowed for additional growth of the region attracting businesses and industries. The area surrounding the subject property developed during the 1970s with commercial and industrial properties including the Auto Park adjacent to the subject property in 1977 (*Continued on the Continuation Sheet*).

B11. Additional Resource Attributes: N/A

***B12. References:** *See Continuation Sheet*.

B13. Remarks: N/A

***B14. Evaluator:** Ashley Losco, Rincon Consultants, Inc.
***Date of Evaluation:** 2/11/2025

(This space reserved for official comments.)

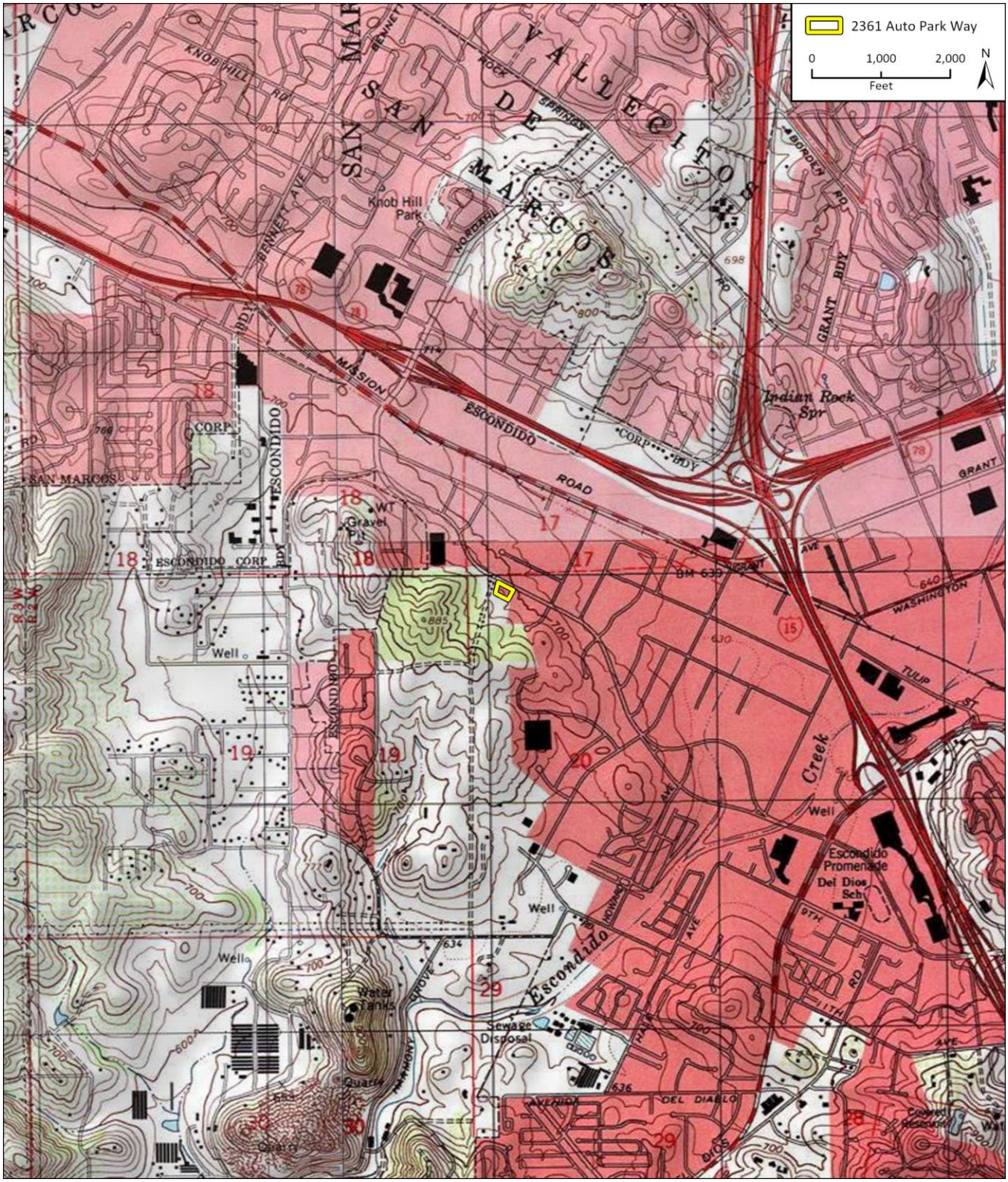
***Required information**

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

Page 3 **of** 9 ***Resource Name or #** 2361 Auto Park Way
***Map Name:** *Escondido, Calif.* ***Scale:** 1:24,000 ***Date of map:** 1996



* Required information

***P3a. Description (Continued from Page 1):**
The rear portion of the building is a repair shop constructed of steel framing and clad in sheets of corrugated metal. This portion of the building has a low-pitched side gable roof, and this portion of the building is slightly taller than the front, public-facing storefront. The west elevation has two openings towards the northern end of the elevation: an entrance with a flush metal door and a large opening for cars to enter the repair shop with a roll-up metal door (Photograph 3). A carport addition was constructed to the southern end of the west elevation between 1995 and 1996. Capped with a flat roof clad in sheets of corrugated metal, the carport is constructed of steel framing and enclosed with sheets of corrugated metal at the south elevation.

The east elevation of the rear repair shop has an open porch which spans the length of the elevation (Photograph 4). The porch is capped by a flat roof clad in sheets of corrugated metal. The southern elevation of the rear repair shop has no architecture features, though two detached steel-framed carports sit south of the south elevation adjacent to the hillside. Constructed between 1995 and 1996, the carports are capped with side gable roofs and enclosed with sheets of corrugated metal at the north, south, and east elevations (Photograph 5).

The front of the property has a wide setback along Auto Park Way and is landscaped with gravel, palm trees, and ornamental plants along with a flagpole and company sign. The western portion of the property is paved with concrete for a parking lot and accessible from Auto Park Way by a paved driveway. The parking lot is separated by the sidewalk by landscaping of gravel and small ornamental bushes. The building has some characteristics of the Traditional Ranch architectural style such as broad low one-story shape, hipped roof with wide eaves, and entry recessed under the main roof.

P5a-b. Photographs (Continued from Page 1):


Photograph 2: Primary, north elevation and landscaped front lawn, view south.


Photograph 3: West elevation showing rear repair shop of building and carport addition, view east.


Photograph 4: East elevation, view south.


Photograph 5: South elevation and two detached carports, view northeast.

***B10. Significance (Continued from Page 3):**
In recent decades, Escondido has embraced its identity as a diverse and culturally vibrant city. Efforts to preserve its historical landmarks and promote community engagement have been central to Escondido's growth. The California Center for the Arts, a cultural hub featuring theater, art galleries, and educational programs, has become a focal point for arts and entertainment in the region (Escondido History Center 2019). The city's commitment to sustainable development is evident in the Escondido General Plan, which outlines a vision for the future. The plan emphasizes responsible growth, environmental stewardship, and the preservation of open spaces (City of Escondido 2012). As Escondido moves forward, it remains grounded in its past, acknowledging the contributions of its indigenous people, early settlers, and the many individuals who have shaped its vibrant community.

Traditional Ranch Architectural Style
Based on visual observation, 2361 Auto Park Way expresses minimal characteristics of the Traditional Ranch style, popular in the United States and California between 1935 and 1975. Though the style was largely applied to residential properties, some architects and builders applied the style to commercial and institutional properties for the buildings to appear compatible with a surrounding suburban environment (Horak et al. 2015).

Traditional Ranch style originated in southern California in the mid-1930s, though the style was not widely popular in the 1940s due to the strict financial controls of the Federal Housing Administration financing guidelines during World War II (McAlester 2015). As financial controls lifted after World War II, the Traditional Ranch style gained popularity and was the most popular style in residential design during the 1950s and 1960s with some commercial examples expressing the style, like the subject property. The style was applied to individual properties as well as large suburban subdivisions. Traditional Ranch buildings typically expressed a broad one-story shape built low to the ground with a low-pitched roof without dormers and moderate to wide eave overhang (McAlester 2015). The entry is sheltered under the main roof of the building, and the façade is typically asymmetrical. A list of character-defining features is included below:

Character-Defining Features of the Traditional Ranch Style (Horak et al. 2015; McAlester 2015):

- Asymmetrical informal composition with one or more wings
- Asymmetrical front entry usually sheltered under main roof
- Brick or stone chimneys
- Close relationship to its yard
- Dutch doors
- Eaves with exposed rafter tails
- Low-pitched roof without dormers
- Exposed post and beam construction
- French doors
- Gabled roof, originally shingled
- One or two stories in height; broad low shape
- Large picture windows
- Shutters
- Sliding glass doors
- Two-story versions can include Monterey Colonial elements, including second-story balconies
- Typically designed by a well-known architect

Property Development History

2361 Auto Park Way sits on the south side of Auto Park Way northwest of the city of Escondido. Before the 1960s, the area was rural and developed with agricultural properties; however, after World War II and the expansion of the suburbs and automobile use, the surrounding area developed with commercial and industrial properties. In 1971, Dr. Lionel and Marilyn Burton and Charles and Dorothy Helferich purchased the subject property (TRC Environmental Corporation 2025). In 1973, Tacoma Wheel Inc. leased the property from the owners and constructed the extant commercial building with the front commercial space and rear repair shop originally addressed as 2361 Vineyard Avenue (*Daily Times-Advocate* 1973a).

Since construction in 1973, the only identifiable alterations include the construction of the carport to the west elevation between 1995 and 1996 and the construction of the two detached carports along the south elevation between 1995 and 1996 (NETR Online 2025). Between 2009 and 2012, the owners replaced the original wood shingle roofing with composition shingles and replaced the front door (Google Street View 2009 and 2012).

Ownership History

As stated above, in 1971, Dr. Lionel and Marilyn Burton and Charles and Dorothy Helferich purchased the subject property (TRC Environmental Corporation 2025). Dr. Lionel Burton was born in Kansas City, Missouri in 1927 and moved to the San Marcos area in the 1950s. Dr. Burton was a physician at the Palomar Memorial Hospital and coach for San Marcos High School's football team in the 1960s (*Daily Times-Advocate* 1961; Ancestry.com 1965). In the 1970s, Dr. Burton served on the San Marcos City Council and as mayor from 1973 to 1977 (*Daily Times-Advocate* 1973b). Dr. Burton and his wife lived in San Marcos until his death in 2021 (Ancestry.com 2025a). No additional information was identified on Mrs. Burton.

Born in Ohio in 1924, Charles Helferich moved to San Marcos, California in the 1950s where he worked as a contractor (Ancestry.com 2025b; *Daily-Times Advocate* 1966). Mr. Helferich and Dr. Burton owned other properties together with their wives such as an apartment building at 331 Richmar Avenue (*Daily Times-Advocate* 1971). Based on Helferich's background, Mr. Helferich may have been the builder of the subject property, though no evidence was identified to substantiate the connection. Mr. Helferich constructed commercial, institutional, and single- and multi-family residential properties throughout San Marcos until the 1980s. He passed away in 1994 (Ancestry.com 2025b).

In 2012, Neva L. Hartjen purchased the subject property and owns the property today. Several occupants occupied 2361 Auto Park Way between 1973 and the present. The full list of owners and occupants is included below in Table 1.

Table 1. 2361 Auto Park Way Ownership and Occupancy History

Date	Name	Owner/Occupant	Source
1971	Dr. Lionel and Marilyn Burton Charles and Dorothy Helferich	Owner	TRC Environmental Corporation 2025
1973	Tacoma Wheels Inc.	Occupant	*Daily Times-Advocate* 1973a
1976	Tacoma Wheel Inc. T Tors Ltd.	Occupant	TRC Environmental Corporation 2025
1977-1978	Mitchell Equipment Co.	Occupant	*Daily Times-Advocate* 1977 and 1978
1980	Maruyama Corp. of America	Occupant	TRC Environmental Corporation 2025
1981-1985	Western Agricultural Irrigation Co. Inc.	Occupant	*Daily Times-Advocate* 1981 and 1982 TRC Environmental Corporation 2025
1991	Olsen Brad Construction Inc.	Occupant	TRC Environmental Corporation 2025
1995	Accurate Paint & Body	Occupant	TRC Environmental Corporation 2025
1995	Auto Art Paint & Body	Occupant	TRC Environmental Corporation 2025
2000-2006	Auto Art Paint & Body Accurate Auto Sales	Occupant	TRC Environmental Corporation 2025
2012	Neva L. Hartjen	Owner	TRC Environmental Corporation 2025
2010-2017	Auto Art Collision Specialists Accurate Auto Sales	Occupant	TRC Environmental Corporation 2025; Google Street View 2024
2020-2025	Auto Art Collision Specialists Accurate Auto Sales AA Paint & Body Inc.	Occupant	TRC Environmental Corporation 2025; Google Street View 2024
2025-Present	Enterprise BESS LLC	Occupant	TRC Environmental Corporation 2025

Historical Resources Evaluation

This DPR form recorded and evaluated 2361 Auto Park Way for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and for local listing as a City of Escondido Landmark. The resource is recommended not eligible for listing in the NRHP and CRHR under all criteria (Criteria A/1, B/2, C/3, and D/4) and as a local landmark under all criteria (Criteria 1 through 13).

NRHP and CRHR Historical Resources Evaluation

Due to their geographic relevancy and applicability to the subject property, the current evaluation relied on the context provided in the following documents to support evaluation of the subject property: *City of Escondido Context Statement*, prepared by the City of Escondido and *The Ranch House, 1930-1975*, prepared by ARG and ICF International as part of SurveyLA, Los Angeles Citywide Historic context Statement, in 2015. Constructed in 1973, 2361 Auto Park Way was constructed at the tail-end of post-World War II expansion of Escondido outside of the city's original boundaries. Research did not indicate that the property significantly contributed to Escondido's post-World War II expansion. According to National Register Bulletin 15 from the National Park Service (NPS), mere association with a historic trend does not qualify under Criterion A/1 (NPS 1995). Therefore, the subject property is recommended not eligible for listing in the NRHP and

CRHR under Criterion A/1.
Dr. Lionel Burton and Mr. Charles Helferich and their wives owned the subject property between 1971 and 2012. Both men moved to the San Marcos area in the 1950s to 1960s and were active within the community. Though Dr. Burton played a large role in the San Marcos community, serving on city council and as mayor, coaching the high school football team, and working as a local doctor, research did not identify Dr. Burton played a significant role in the city of Escondido where the property is located nor a significant at the state or national level. The property was simply owned by Dr. Burton, likely as an investment property, and was not directly associated with his work in the city of San Marcos. As stated under Criterion A/1, mere association with an individual does not qualify for listing in the NRHP or CRHR (NPS 1995). Research also did not identify Mr. Helferich as significant in local, state, and national history. Therefore, 2361 Auto Park Way is recommended not eligible for listing in the NRHP and CRHR under Criterion B/2.

Constructed in 1973, 2361 Auto Park Way has minimal elements of the Traditional Ranch architectural style including an asymmetrical informal composition, one-story low to the ground form, and a gabled roof with moderate eave overhang. Despite possessing the basic elements of the style, the building does not express the elaborate details or architectural elaborations to set it apart from other examples such as an entry located off-center, large picture windows, shutters, Dutch doors, exposed post and beam construction, or designs by a well-known architect (Horak et al. 2015; McAlester 2015). Additionally, owners and tenants have removed original materials such as the replacement of wood roof shingles with composition shingles and replacement of the front door by 2012. Even more, the Traditional Ranch style is most significantly applied to residential properties, not commercial properties (Horak et al. 2015). As a result of missing materials and lack of architectural elaborations, 2361 Auto Park Way is not an exceptional example of the Traditional Ranch style.

Research through Newspapers.com, available city records, and other sources did not identify the contractor or architect of the subject property. Based on his background, Mr. Helferich may have constructed the subject property, but research did not identify a direct connection. Despite the lack of evidence, the subject property is not an exceptional example of Mr. Helferich's body of work nor does his qualify him as a master contractor in San Marcos. Further, the subject property does not have artistic value; therefore, the subject property is recommended not eligible for listing in the NRHP and CRHR under Criterion C/3.

2361 Auto Park Way is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-20th century Traditional Ranch commercial buildings. Therefore, the subject property is recommended not eligible for listing in the NRHP and CRHR under Criterion D/4.

City of Escondido Local Landmark Evaluation
Dr. Lionel Burton played a role in the city of San Marcos, but did not significantly contribute to the culture, history, prehistory, or development of the city of Escondido. He merely owned a property within the city of Escondido, but research did not identify how he contributed to the city's development. Therefore, 2361 Auto Park Way is recommended not eligible for local listing under Criterion 1.

As stated above, the commercial building on the subject property is not a significant example of the Traditional Ranch architectural style as it lacks detailed architectural elaborations and original materials, such as the wood shingle roofing and front door which were removed in 2012. The builder and architect of the building were not identified during research, and no information was identified to contribute the property's construction to Mr. Helferich. Therefore, 2361 Auto Park Way is recommended not eligible for local listing under Criterion 2. Also, the property is not one of the few remaining examples in the city possessing distinguishing characteristics of the Traditional Ranch style. Most of the post-World War II development in Escondido was constructed with elements of the Traditional Ranch style such as the residences on Avenida Del Diablo or Brooks Glen; therefore, it is recommended not eligible for local listing under Criterion 7. Lastly, the property is not exemplary of technology, craftsmanship or design of the period when it was constructed nor does it use historical sign materials; it is recommended not eligible for local listing under Criteria 8, 9, and 10.

Several tenants occupied the property between 1973 and the present; refer to Table 1 in the Significance Section. Research did not identify that any of the businesses significantly impacted the city of Escondido nor that any of the businesses are now considered rare. All are typical establishments found within a city such as an auto body repair shop or equipment sales company. Therefore, the subject property is recommended not eligible for local listing under Criterion 3.

Research through Newspapers.com, Ancestry.com, and the City of Escondido Historic Context Statement, did not identify that the property was the site of a significant historical event. It is recommended not eligible for local listing under Criterion 4.

2361 Auto Park Way is 50 years old, but it is not historically significant within the city of Escondido. Mere age does not make a resource historically eligible; therefore, it is recommended not eligible for local listing under Criterion 5.

The subject property is not an important key focal point in the visual quality or character of a neighborhood, street, area or district. It is

recommended not eligible for local listing under Criterion 6.
The subject property is not a landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities nor is it an archaeological site that has yielded, or may be likely to yield, information important in prehistory. 2361 Auto Park Way is recommended not eligible for local listing under Criteria 11 and 12.

Lastly, 2361 Auto Park Way does not have an outstanding rating of the criteria used to evaluate local register requests. 2361 Auto Park Way is recommended not eligible for local listing under Criterion 13.

***B12. References (Continued from Page 3):**

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