

5. Environmental Analysis

5.3 BIOLOGICAL RESOURCES

This section of the updated Draft Program Environmental Impact Report (PEIR) discusses the potential impacts to biological resources within the City of Santa Ana and its sphere of influence (plan area) associated with the General Plan Update (GPU). This section includes a discussion of the biological resources of the existing environment that would be potentially altered by the GPU's implementation and the consistency of the GPU with established relevant policies.

The analysis in this section is based in part on the following technical memorandum:

- *Biological and Natural Resource Inventory and Assessment for the City of Santa Ana General Plan Update*, Carlson Strategic Land Solutions Inc. (CSLS), May 26, 2020.

A complete copy of this report is included in the technical appendices to this updated Draft PEIR (Volume III, Appendix D).

5.3.1 Environmental Setting

5.3.1.1 REGULATORY BACKGROUND

Local laws, regulations, plans, or guidelines related to biological resources that are potentially applicable to the proposed project are summarized below.

Federal and State Regulations

Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. "Take" of endangered species is prohibited under Section 9 of the FESA. "Take" means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires federal agencies to consult with the US Fish and Wildlife Service (USFWS) on proposed federal actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. Section 4(a) of the FESA requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." This provides guidance for planners/managers and biologists by indicating locations of suitable habitat and where preservation of a particular species has high priority. Section 10 of the FESA provides the regulatory mechanism for incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCP) for the impacted species must be developed in support of incidental take permits to minimize impacts to the species and formulate viable mitigation measures.

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Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA) affirms and implements the United States' commitment to four international conventions—with Canada, Japan, Mexico, and Russia—to protect shared migratory bird resources. The MBTA governs the take, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these items, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the MBTA.

Clean Water Act, Section 404

The United States Army Corps of Engineers (USACE) regulates discharge of dredged or fill material into “waters of the United States.”¹ Any filling or dredging within waters of the United States requires a permit, which entails assessment of potential adverse impacts to USACE wetlands and jurisdictional waters and any mitigation measures that the USACE requires. Section 7 consultation with USFWS may be required for impacts to a federally listed species. If cultural resources may be present, Section 106 review may also be required. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the Regional Water Quality Control Board (RWQCB).

Clean Water Act, Section 401 and 402

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include USACE Section 404 permits and National Pollutant Discharge Elimination System permits issued by the US Environmental Protection Agency under Section 402 of the CWA. These permits are issued by the applicable RWQCB. The City of Santa Ana is in the jurisdiction of the Santa Ana RWQCB (Region 8).

California Fish and Game Code, Section 1600

Section 1600 of the California Fish and Game Code requires a project proponent to notify the California Department of Fish and Wildlife (CDFW) of any proposed alteration of streambeds, rivers, and lakes. The intent is to protect habitats that are important to fish and wildlife. CDFW may review and place conditions on the project, as part of a Streambed Alteration Agreement, that address potentially significant adverse impacts within CDFW's jurisdictional limits.

¹ “Waters of the United States,” as applied to the jurisdictional limits of the Corps under the Clean Water Act, includes all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the tide; all interstate waters, including interstate wetlands; and 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 whose use, degradation, or destruction could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; and wetlands adjacent to waters. The terminology used by Section 404 of the Clean Water Act includes “navigable waters,” which is defined at Section 502(7) of the act as “waters of the United States, including the territorial seas.”

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California Endangered Species Act

The California Endangered Species Act (CESA) generally parallels the main provisions of the FESA and is administered by the CDFW. Its intent is to prohibit take and protect state-listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to species petitioned for listing (state candidates). Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Under certain conditions, CESA has provisions for take through a 2081 permit or memorandum of understanding. In addition, some sensitive mammals and birds are protected by the state as “fully protected species.” California “species of special concern” are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW’s California Natural Diversity Database (CNDDDB), which maintains a record of known and recorded occurrences of sensitive species. Informally listed taxa are not protected per se, but warrant consideration in the preparation of biological resources assessments.

Natural Community Conservation Plan/Habitat Conservation Plan

The City of Santa Ana is not within a Natural Community Conservation Plan/Habitat Conservation Plan area. The Central and Coastal Orange County Natural Community Conservation and Habitat Conservation Plan (NCCP/HCP) is located to the east of the City. The City is not a signatory to the NCCP/HCP.

Local Regulations

Municipal Code

Santa Ana Municipal Code Chapter 33, Article VII, Regulation of the Planting, Maintenance, and Removal of Trees, establishes regulations and standards necessary to ensure that the city will realize the benefits provided by its urban forest.

5.3.1.2 EXISTING CONDITIONS

The 27.4-square-mile plan area encompasses the existing city limits and the sphere of influence (SOI). Topographically, elevations range from approximately 210 feet above mean sea level at the northeast corner of the plan area to 35 feet at the city’s southern border. The climate in Santa Ana is typified by short, warm, arid, and clear summers and long, cool, and partly cloudy winters. Over the course of the year, the temperature typically varies from 45°F to 84°F and is rarely below 39°F or above 92°F (Weather Spark 2019).

Over the years, the city has been substantially disturbed by industrial, commercial, and residential activities, with lands within the city having primarily been converted to urban development. The Santa Ana Freeway (I-5) cuts through the northeastern section of the city. SR-55 generally defines the southwestern boundary of the city, and I-405 is just south of Santa Ana. The Santa Ana River runs through the western section of the city, and Santiago Creek runs in the northern section.

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Due to urbanization, readily apparent resources such as natural habitat and wildlife are limited. Certain stretches of Santiago Creek offer undisturbed plant and wildlife environments. Some conserved land adjacent to the creek in the northeastern portion of the city contain coast live oak trees. Outside of these areas are only remnants of native habitats and vegetation communities. However, open space lands for park and recreational uses offer important opportunities for enjoyment of a rare urban resource. River View Golf Course, Willowick Golf Course, Centennial Regional Park, Angels Community Park, Heritage Park, and other community parks within the city boundaries contain maintained landscaped areas with ornamental vegetation.

Vegetation Communities

The biological and natural resource inventory began with a thorough investigation of available literature and databases regarding existing and known open space in the city's current General Plan, mapping sensitive habitats, special status plants, and wildlife species within the plan area. Seven vegetation communities were identified in the open space and vacant parcels in the plan area (see Figure 5.3-1, *Open Space Inventory*).

- **Riparian.** This community consists of willow species (*Salix* sp.), mulefat (*Baccharis salicifolia*), Fremont's cottonwood (*Populus fremontii*), elderberry (*Sambucus nigra*), and western sycamore (*Platanus racemosa*). Portions of the riparian community consists of white alder (*Alnus rhombifolia*), tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), and eucalyptus trees (*Eucalyptus* sp.). This community is associated with Santiago Creek.
- **Unvegetated Streambed.** This community is associated with the natural bottom portion of the Santa Ana River and contains minimal amounts of vegetation or is void of vegetation completely.
- **Oak Woodland.** This community consists of primarily coast live oak trees (*Quercus agrifolia*). The understory consists of minimal nonnative grasses and bare ground. This community is found adjacent to Santiago Creek in the northeastern portion of the city.
- **Ornamental.** This community includes maintained landscaped areas. The ornamental vegetation is nonnative, and some of it is considered invasive. The ornamental habitat type includes shade trees, such as Peruvian pepper tree (*Schinus molle*), Brazilian pepper (*Schinus terebinthifolius*), and grass associated with the City parks, primarily Kentucky bluegrass (*Poa pratensis*). This vegetation community includes River View Golf Course, Willowick Golf Course, and other various community parks within the city boundaries. (See Figure 5.3-1 and Chapter 5.15, *Recreation*, Figure 5.15-1).
- **Ruderal.** This community is associated with areas that are heavily disturbed by human activities, such as demolition of existing structures, annual mowing, and dominance of nonnative and/or invasive species. The ruderal habitat type includes Russian thistle (*Salsola tragus*), mustard (*Brassica* sp.), cheeseweed (*Malva parviflora*), and large areas that are void of vegetation.
- **Disturbed.** This community is void of any vegetation.
- **Developed.** This community consists of General Plan–designated Open Space parcels that are developed with structures. This community includes the Fairhaven Memorial Park and Mortuary, the Santa Ana Zoo,

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and the concrete-lined channels of the Santa Ana River and Santiago Creek. These areas consist of primarily built materials and are frequently maintained.

The biological and natural resource inventory identified a total of 499 parcels designated as Open Space land use within the city's boundaries. An additional 135 parcels were identified as vacant or contain natural resources but are not designated Open Space. An additional four parcels, consisting of 83.37 acres, were identified as vacant parcels outside of the city's boundaries but within the SOI. The SOI parcels include portions of the concrete-lined Santa Ana River on the southwestern SOI boundary (see Figure 5.3-1). Table 1 in the biological resources report provides a description of each parcel in the SOI (see Appendix D).

Focus Areas

Five focus areas have been identified as part of the General Plan Update. Natural resources for each focus area are:

- **South Main Street.** The South Main Street focus area does not contain any Open Space–designated parcels or vacant lots (see Figure 5 of Appendix D). The parcels in this focus area all consist of developed land.
- **Grand Avenue/17th Street.** The Grand Avenue/17th Street focus area has 2 parcels designated Open Space and 9 vacant parcels that are not designated Open Space (see Figure 6 of Appendix D). The parcels designated Open Space total 1.47 acres and are both associated with the railroad right-of-way.
- **West Santa Ana Boulevard.** The West Santa Ana Boulevard focus area has 28 parcels designated Open Space and no other vacant parcels (see Figure 7 of Appendix D). The parcels total 148.11 acres. The focus area includes the Willowick Golf Course, Angels Community Park, and a portion of the Santa Ana River.
- **SR-55/Dyer Road.** The SR-55/Dyer Road focus area has 7 parcels designated Open Space and 3 vacant parcels with other designations (see Figure 8 of Appendix D). The parcels total 6.22 acres and include the railroad right-of-way, vacant parcels with ruderal vegetation, and concrete channels.
- **South Bristol Street.** The South Bristol Street focus area has 10 parcels designated Open Space and no other vacant parcels (see Figure 9 of Appendix D). The parcels total 6.94 acres and include the railroad right-of-way, concrete channels, parking lot, underground channel/turf, and linear parks with ornamental vegetation.

The biological and natural resource inventory (see Appendix D) includes summary tables for each focus area that inventory Open Space–designated land use or vacant lots and identify the existing General Plan land use designation, the physical land use, vegetation community, acreage, and Assessor's Parcel Number.

Sensitive Resources

Several species of plants and animals in California have low populations and/or limited distributions. Such species may be considered rare and are vulnerable to extinction as the state's human population grows and the species' habitats are converted to agricultural and urban uses. As described more fully in Section 5.3.1.1, *Regulatory Background*, state and federal laws have provided CDFW and USFWS with a method for conserving

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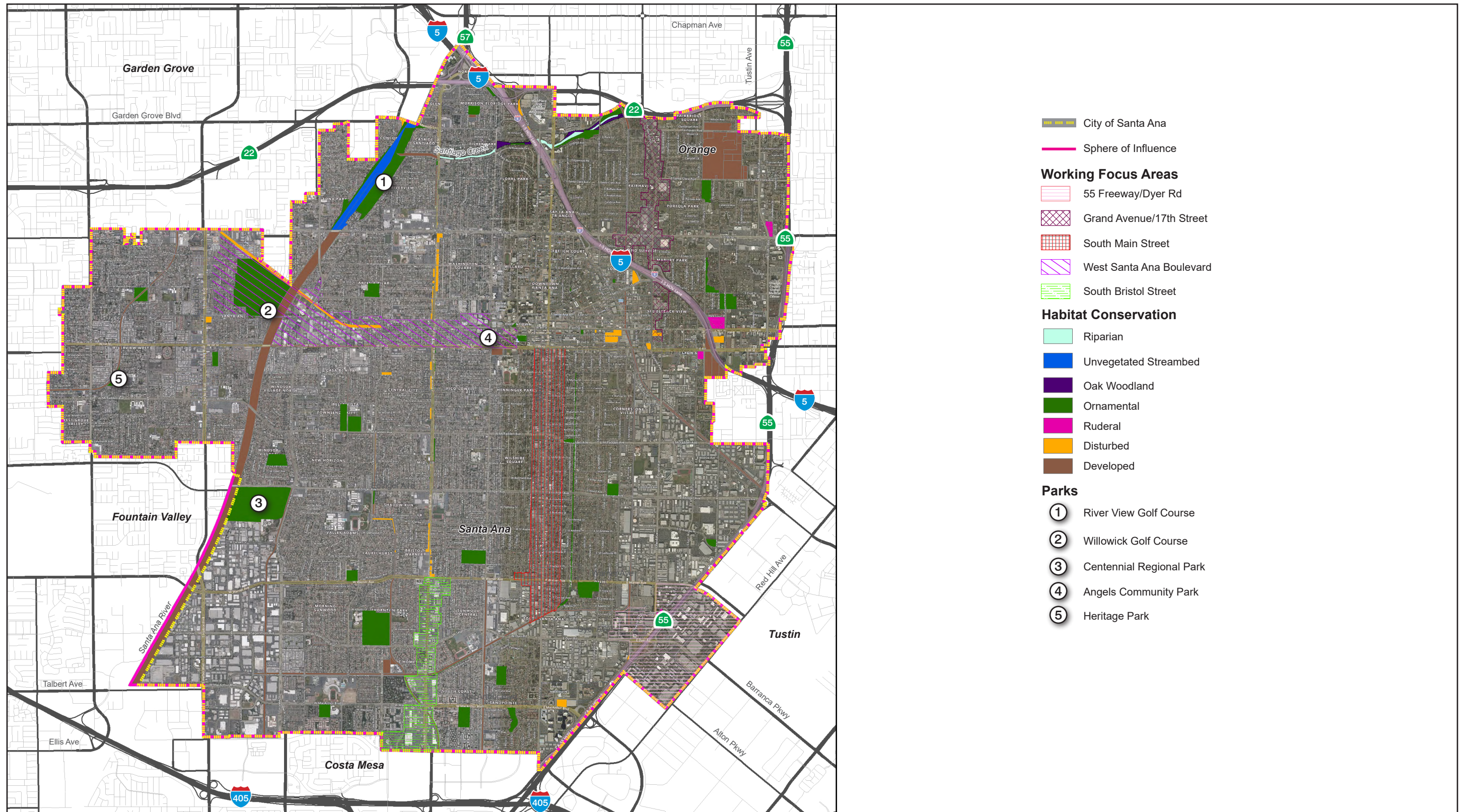
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and protecting the diversity of plant and animal species native to the state. A sizable number of native plants and animals have been formally designated “threatened” or “endangered” under state and federal endangered species acts. Others have been designated as candidates for such listing. Still others have been designated “species of special concern” by the CDFW. The California Native Plant Society has developed its own set of lists of native plants considered rare, threatened, or endangered. Collectively, these plants and animals are referred to as “special status species.”

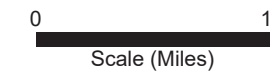
In addition to parcels identified within the city boundaries that are designated open space or that are identified as vacant or containing natural resources (not designated open space), an additional 4 parcels, consisting of 83.37 acres, were identified as vacant parcels outside of the city boundaries but within the SOI. The SOI parcels include vacant parcels on portions of the concrete-lined Santa Ana River in the southwestern part of the SOI. As discussed under “Vegetation Communities,” above Santa Ana contains riparian habitat and oak woodland associated with Santiago Creek.

A review of the USFWS critical habitat mapper for threatened and endangered species shows that no critical habitat exists in Santa Ana (USFWS 2020a).

Figure 5.3-1 - Open Space Inventory



Source: Carlson Strategic Land Solutions, 2020



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Sensitive Plants

As discussed under “Vegetation Communities,” Santa Ana contains oak woodland along Santiago Creek. A review of the CNDDB identified sensitive plants, shown in Table 5.3-1, within four quads that encompass Santa Ana—the Tustin, Orange, Anaheim, and Newport Beach quads.

Table 5.3-1 Sensitive Plant Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Allen's pentachaeta	<i>Pentachaeta aurea</i> ssp. <i>allenii</i>	None	None	-	1B.1
aphanisma	<i>Aphanisma blitoides</i>	None	None	-	1B.2
California box-thorn	<i>Lycium californicum</i>	None	None	-	4.2
California Orcutt grass	<i>Orcuttia californica</i>	Endangered	Endangered	-	1B.1
Catalina mariposa-lily	<i>Calochortus catalinae</i>	None	None	-	4.2
chaparral ragwort	<i>Senecio aphanactis</i>	None	None	-	2B.2
chaparral sand-verbena	<i>Abronia villosa</i> var. <i>aurita</i>	None	None	-	1B.1
coast woolly-heads	<i>Nemacaulis denudata</i> var. <i>denudata</i>	None	None	-	1B.2
Coulter's goldfields	<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	None	None	-	1B.1
Coulter's saltbush	<i>Atriplex coulteri</i>	None	None	-	1B.2
Davidson's saltscale	<i>Atriplex serenana</i> var. <i> davidsonii</i>	None	None	-	1B.2
decumbent goldenbush	<i>Isocoma menziesii</i> var. <i>decumbens</i>	None	None	-	1B.2
estuary seablite	<i>Suaeda esteroa</i>	None	None	-	1B.2
Gambel's water cress	<i>Nasturtium gambelii</i>	Endangered	Threatened	-	1B.1
Horn's milk-vetch	<i>Astragalus hornii</i> var. <i>hornii</i>	None	None	-	1B.1
intermediate mariposa-lily	<i>Calochortus weedii</i> var. <i>intermedius</i>	None	None	-	1B.2
Lewis' evening-primrose	<i>Camissoniopsis lewisii</i>	None	None	-	3
Los Angeles sunflower	<i>Helianthus nuttallii</i> ssp. <i>parishii</i>	None	None	-	1A
many-stemmed dudleya	<i>Dudleya multicaulis</i>	None	None	-	1B.2
mud nama	<i>Nama stenocarpa</i>	None	None	-	2B.2
paniculate tarplant	<i>Deinandra paniculata</i>	None	None	-	4.2
Parish's brittlescale	<i>Atriplex parishii</i>	None	None	-	1B.1
prostrate vernal pool navarretia	<i>Navarretia prostrata</i>	None	None	-	1B.2
red sand-verbena	<i>Abronia maritima</i>	None	None	-	4.2
Robinson's pepper-grass	<i>Lepidium virginicum</i> var. <i>robinsonii</i>	None	None	-	4.3
salt marsh bird's-beak	<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	Endangered	Endangered	-	1B.2
salt spring checkerbloom	<i>Sidalcea neomexicana</i>	None	None	-	2B.2
San Bernardino aster	<i>Symphotrichum defoliatum</i>	None	None	-	1B.2
San Diego button-celery	<i>Eryngium aristulatum</i> var. <i>parishii</i>	Endangered	Endangered	-	1B.1
Santa Ana River woollystar	<i>Eriastrum densifolium</i> ssp. <i>sanctorum</i>	Endangered	Endangered	-	1B.1
small spikerush	<i>Eleocharis parvula</i>	None	None	-	4.3
small-flowered morning-glory	<i>Convolvulus simulans</i>	None	None	-	4.2
south coast branching phacelia	<i>Phacelia ramosissima</i> var. <i>australitoralis</i>	None	None	-	3.2
south coast saltscale	<i>Atriplex pacifica</i>	None	None	-	1B.2

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Table 5.3-1 Sensitive Plant Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
southern California black walnut	<i>Juglans californica</i>	None	None	-	4.2
southern tarplant	<i>Centromadia parryi</i> ssp. <i>australis</i>	None	None	-	1B.1
southwestern spiny rush	<i>Juncus acutus</i> ssp. <i>leopoldii</i>	None	None	-	4.2
vernal barley	<i>Hordeum intercedens</i>	None	None	-	3.2
woolly seablite	<i>Suaeda taxifolia</i>	None	None	-	4.2

Source: CDFW 2020b.

Notes: Rare Plant Ranks:

- 1A: Plants presumed extinct in California and rare/extinct elsewhere
- 1B.1: Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California
- 1B.2: Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California
- 1B.3: Plants rare, threatened, or endangered in California and elsewhere; not very threatened in California
- 2A: Plants presumed extirpated in California, but more common elsewhere
- 2B.1: Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California
- 2B.2: Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California
- 2B.3: Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California
- 3.1: Plants about which we need more information; seriously threatened in California
- 3.2: Plants about which we need more information; fairly threatened in California
- 3.3: Plants about which we need more information; not very threatened in California
- 4.1: Plants of limited distribution; seriously threatened in California
- 4.2: Plants of limited distribution; fairly threatened in California
- 4.3: Plants of limited distribution; not very threatened in California

Sensitive Wildlife

A review of the CNDDDB identifies the sensitive wildlife, shown in Table 5.3-2, within four quads that encompass Santa Ana—the Tustin, Orange, Anaheim, and Newport Beach quads.

Table 5.3-2 Sensitive Wildlife Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status
Amphibians				
Coast Range newt	<i>Taricha torosa</i>	None	None	SSC
western spadefoot	<i>Spea hammondi</i>	None	None	SSC
Birds				
American bittern	<i>Botaurus lentiginosus</i>	None	None	-
American peregrine falcon	<i>Falco peregrinus anatum</i>	Delisted	Delisted	FP
American white pelican	<i>Pelecanus erythrorhynchos</i>	None	None	SSC
bald eagle	<i>Haliaeetus leucocephalus</i>	Delisted	Endangered	FP
bank swallow	<i>Riparia</i>	None	Threatened	-
Barrow's goldeneye	<i>Bucephala islandica</i>	None	None	SSC
Belding's savannah sparrow	<i>Passerculus sandwichensis beldingi</i>	None	Endangered	-
Bell's sage sparrow	<i>Artemisiospiza belli</i>	None	None	WL
black skimmer	<i>Rynchops niger</i>	None	None	SSC
black-crowned night heron	<i>Nycticorax</i>	None	None	-
burrowing owl	<i>Athene cucularia</i>	None	None	SSC
California black rail	<i>Laterallus jamaicensis coturniculus</i>	None	Threatened	FP

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Table 5.3-2 Sensitive Wildlife Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status
California brown pelican	<i>Pelecanus occidentalis californicus</i>	Delisted	Delisted	FP
California gull	<i>Larus californicus</i>	None	None	WL
California horned lark	<i>Eremophila alpestris actia</i>	None	None	WL
California least tern	<i>Sternula antillarum browni</i>	Endangered	Endangered	FP
Caspian tern	<i>Hydroprogne caspia</i>	None	None	-
Clark's marsh wren	<i>Cistothorus palustris clarkae</i>	None	None	SSC
coastal cactus wren	<i>Campylorhynchus brunneicapillus sandiegensis</i>	None	None	SSC
coastal California gnatcatcher	<i>Polioptila californica</i>	Threatened	None	SSC
common loon	<i>Gavia immer</i>	None	None	SSC
Cooper's hawk	<i>Accipiter cooperii</i>	None	None	WL
Costa's hummingbird	<i>Calypte costae</i>	None	None	-
double-crested cormorant	<i>Phalacrocorax auritus</i>	None	None	WL
elegant tern	<i>Thalasseus elegans</i>	None	None	WL
grasshopper sparrow	<i>Ammodramus savannarum</i>	None	None	SSC
great blue heron	<i>Ardea herodias</i>	None	None	-
great egret	<i>Ardea alba</i>	None	None	-
least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered	Endangered	-
least bittern	<i>Ixobrychus exilis</i>	None	None	SSC
lesser sandhill crane	<i>Antigone canadensis</i>	None	None	SSC
light-footed Ridgway's rail	<i>Rallus obsoletus levipes</i>	Endangered	Endangered	FP
loggerhead shrike	<i>Lanius ludovicianus</i>	None	None	SSC
long-billed curlew	<i>Numenius americanus</i>	None	None	WL
long-eared owl	<i>Asio otus</i>	None	None	SSC
Lucy's warbler	<i>Oreothlypis luciae</i>	None	None	SSC
mountain plover	<i>Charadrius montanus</i>	None	None	SSC
northern harrier	<i>Circus hudsonius</i>	None	None	SSC
olive-sided flycatcher	<i>Contopus cooperi</i>	None	None	SSC
osprey	<i>Pandion haliaetus</i>	None	None	WL
prairie falcon	<i>Falco mexicanus</i>	None	None	WL
purple martin	<i>Progne subis</i>	None	None	SSC
redhead	<i>Aythya americana</i>	None	None	SSC
rufous hummingbird	<i>Selasphorus rufus</i>	None	None	-
sharp-shinned hawk	<i>Accipiter striatus</i>	None	None	WL
short-eared owl	<i>Asio flammeus</i>	None	None	SSC
short-tailed albatross	<i>Phoebastria albatrus</i>	Endangered	None	SSC
snowy egret	<i>Egretta thula</i>	None	None	-
southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	None	None	WL
summer tanager	<i>Piranga rubra</i>	None	None	SSC
Swainson's hawk	<i>Buteo swainsoni</i>	None	Threatened	-
tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened	SSC
Vaux's swift	<i>Chaetura vauxi</i>	None	None	SSC

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Table 5.3-2 Sensitive Wildlife Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status
vermillion flycatcher	<i>Pyrocephalus rubinus</i>	None	None	SSC
western snowy plover	<i>Charadrius alexandrinus nivosus</i>	Threatened	None	SSC
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	Threatened	Endangered	-
white-faced ibis	<i>Plegadis chihi</i>	None	None	WL
white-tailed kite	<i>Elanus leucurus</i>	None	None	FP
willow flycatcher	<i>Empidonax traillii</i>	None	Endangered	-
yellow rail	<i>Coturnicops noveboracensis</i>	None	None	SSC
yellow warbler	<i>Setophaga petechia</i>	None	None	SSC
yellow-breasted chat	<i>Icteria virens</i>	None	None	SSC
yellow-headed blackbird	<i>Xanthocephalus</i>	None	None	SSC
Crustaceans				
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	Endangered	None	-
San Diego fairy shrimp	<i>Branchinecta sandiegonensis</i>	Endangered	None	-
Fish				
Santa Ana sucker	<i>Catostomus santaanae</i>	Threatened	None	-
steelhead - southern California DPS	<i>Oncorhynchus mykiss irideus</i>	Endangered	None	-
tidewater goby	<i>Eucyclogobius newberryi</i>	Endangered	None	SSC
Insects				
Crotch bumble bee	<i>Bombus crotchii</i>	None	Candidate Endangered	-
globose dune beetle	<i>Coelus globosus</i>	None	None	-
greenest tiger beetle	<i>Cicindela tranquebarica viridissima</i>	None	None	-
monarch - California overwintering population	<i>Danaus plexippus</i>	None	None	-
quino checkerspot butterfly	<i>Euphydryas editha quino</i>	Endangered	None	-
sandy beach tiger beetle	<i>Cicindela hirticollis gravida</i>	None	None	-
wandering (=saltmarsh) skipper	<i>Panoquina errans</i>	None	None	-
western beach tiger beetle	<i>Cicindela latesignata</i>	None	None	-
western tidal-flat tiger beetle	<i>Cicindela gabbii</i>	None	None	-
Mammals				
American badger	<i>Taxidea taxus</i>	None	None	SSC
big free-tailed bat	<i>Nyctinomops macrotis</i>	None	None	SSC
hoary bat	<i>Lasiurus cinereus</i>	None	None	-
Mexican long-tongued bat	<i>Choeronycteris mexicana</i>	None	None	SSC
Pacific pocket mouse	<i>Perognathus longimembris pacificus</i>	Endangered	None	SSC
southern California saltmarsh shrew	<i>Sorex ornatus salicornicus</i>	None	None	SSC
western mastiff bat	<i>Eumops perotis californicus</i>	None	None	SSC
Yuma myotis	<i>Myotis yumanensis</i>	None	None	-
Mollusks				
mimic tryonia (=California brackishwater snail)	<i>Tryonia imitator</i>	None	None	-

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Table 5.3-2 Sensitive Wildlife Species

Common Name	Scientific Name	Federal Status	State Status	CDFW Status
Reptiles				
coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	SSC
coast patch-nosed snake	<i>Salvadora hexalepis virgulata</i>	None	None	SSC
coastal whiptail	<i>Aspidoscelis tigris stejnegeri</i>	None	None	SSC
orange-throated whiptail	<i>Aspidoscelis hyperythra</i>	None	None	WL
red-diamond rattlesnake	<i>Crotalus ruber</i>	None	None	SSC
San Bernardino ringneck snake	<i>Diadophis punctatus modestus</i>	None	None	-
southern California legless lizard	<i>Anniella stebbinsi</i>	None	None	SSC
western pond turtle	<i>Emys marmorata</i>	None	None	SSC

Source: CDFW 2020b.
Notes:
FP: Fully Protected
SSC: Species of Special Concern
WL: Watch List

CDFW submitted a comment letter, dated March 26, 2020, in response to the Notice of Preparation (see Appendix A-a) that identifies five special status species with potential to occur within the region. Table 5.3-3 summarizes these species. The CDFW’s letter also states that the Santa Ana River and its tributaries have historically supported the endangered southern California steelhead.

Table 5.3-3 Special Status Species with Potential to Occur Within the Region

No.	Species	Listing
1	Steelhead - southern California distinct population segment (<i>Oncorhynchus mykiss irideus</i>)	Federal Endangered Species Act (ESA) listed endangered
2	Coast horned lizard (<i>Phrynosoma blainvillii</i>)	SSC
3	Crotch bumble bee (<i>Bombus crotchii</i>)	Candidate for CESA-listed endangered
4	Mexican long-tongued bat (<i>Choeronycteris mexicana</i>)	SSC
5	American peregrine falcon (<i>Falco peregrinus anatum</i>)	FPS

Source: CDFW 2020c.
Notes:
FPS: Fully Protected Species
SSC: California Species of Special Concern (SSC)

Wildlife Movement Corridors

Wildlife movement corridors may include expanses of open space or vacant land, streams and rivers, or other geographic feature that can facilitate the movement of wildlife. The city is largely urbanized; wildlife movement corridors include the Santa Ana River and Santiago Creek. California Fish and Wildlife’s comment letter dated March 26, 2020 (contained in Appendix A-a) indicates that the Santa Ana River and its tributaries have historically supported federally endangered southern California steelhead. According to the USFWS, the city does not contain critical habitat (USFWS 2020a).

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Jurisdictional Waters and Wetlands

The Santa Ana River traverses the western side of the city from north to south. Santiago Creek stretches east-west in the northern part of the city and joins the Santa Ana River on its western end. The National Wetlands Inventory categorizes the Santa Ana River and Santiago Creek with various types of wetland habitat, including lake, freshwater forested/shrub, freshwater emergent wetland, riverine, and freshwater point (USFWS 2020b). In addition, the National Wetlands Inventory identifies a number of smaller channels and ponds throughout the city. The channels are classified as riverine, and the ponds are classified as freshwater pond (USFWS 2020b). The channels and the ponds are integrated into the existing built environment—for example, channels are constructed along public rights-of-way or run between developed parcels.

5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- B-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-3 Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- B-4 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- B-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- B-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5.3.3 Regulatory Requirements and General Plan Update Policies

5.3.3.1 REGULATORY REQUIREMENTS

- RR B-1 Development associated with the General Plan Update will be required to comply with the provisions of the Federal Endangered Species Act, which protects and conserves any species

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of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found.

- RR B-2 Regulatory requirement for potential direct/indirect impacts to common and sensitive bird and raptor species will require compliance with the California Fish and Game Code Section 3503.
- RR B-3 Development associated with the General Plan Update will be required to comply with the provisions of the Federal Clean Water Act, including sections 401, 402, and 404. Development related to the General Plan Update would be required to obtain a permit pursuant to sections 401, 402, or 404.
- RR B-4 Development associated with the General Plan Update will be required to comply with the California Fish and Game Code, Section 1600. Developments that propose any alteration of streambeds, rivers, and lakes are required to notify the California Department of Fish and Wildlife.
- RR B-5 Development associated with the General Plan Update will be required to comply with the provisions of the California Endangered Species Act and obtain a 2081 permit or memorandum of understanding for the take of a protected species.

5.3.3.2 GENERAL PLAN UPDATE POLICIES

The following are relevant policies of the Santa Ana General Plan Update, which may contribute to reduce potential impacts to biological resources as a result of implementation.

Circulation Mobility Element

- **Policy 3.8 Santa Ana River and Golden Loop.** Proactively pursue the improvement and restoration of the Santa Ana River natural habitat and the completion of the Golden Loop to serve as a multi-use recreational amenity.
- ~~Policy 5.9 Street Trees. Support the greening of City streets through the establishment and maintenance of an urban forest to improve street aesthetics, filter pollution, and address GHG emissions.~~

Conservation Element

- **Policy 2.1 Native Wildlife Habitat Protection.** Protect and enhance natural vegetation in parks and open spaces for wildlife habitat, erosion control, and to serve as noise and scenic buffers.
- **Policy 2.2 Biodiversity Preservation.** Collaborate with State and County agencies to promote biodiversity and protect sensitive biological resources.

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- **Policy 3.5 Landscaping.** ~~Encourage~~ Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.
- **Policy 4.2 Landscaping.** Encourage public and private property owners to plant native or drought-tolerant vegetation.

Land Use Element

- **Policy 4.2 Public Realm.** Maintain and improve the public realm through quality architecture, street trees, landscaping, and other pedestrian-friendly amenities.

Open Space Element

- ~~Policy 1.6 Sustainable Landscape. Promote citywide use of drought tolerant landscape and development practices for wise water use and energy consumption.~~
- ~~Policy 2.4 Urban Forest. Maintain, preserve, and enhance the city's urban forest as an environmental, economic, and aesthetic resource to improve residents' quality of life.~~
- **Policy 3.7 Urban Forest.** Maintain, preserve, and enhance the City's urban forest as an environmental, economic, and aesthetic resource to improve residents' quality of life.
- **Policy 3.6 3.8 Naturalizing the Santa Ana River.** Explore opportunities to reintroduce natural habitat along the Santa Ana River to provide natural habitat and educational and recreational opportunities.

Public Services Element

- **Policy 3.5 Green Infrastructure.** Incorporate sustainable design and Low Impact Development (LID) techniques for storm water facilities and new development to achieve multiple benefits, including enhancing preserving and creating open space and habitat, reducing flooding, and improving runoff water quality.

Urban Design Element

- **Policy 3.1 Landscaped Travelways.** Promote visually appealing and sustainable landscaping along freeway corridors, roadway medians, and parkways.
- **Policy 3.7 Natural Recreational Amenities.** Enhance natural and recreational features of Santiago Creek and the Santa Ana River corridors and provide linkages throughout the community.
- **Policy 3.10 Coordinated Street Improvement Plans.** Coordinate citywide landscape medians and street trees with land use plans and development projects.
- **Policy 3.11 Urban Forest.** Create a diverse urban forest with a variety of sustainable trees in medians, parkways, public open space, and private development.

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5.3.4 Environmental Impacts

5.3.4.1 METHODOLOGY

Inventory

CSLS conducted a Biological and Natural Resource inventory. The Biological and Natural Resource inventory began with a thorough investigation of available literature and databases regarding existing and known open space through the current General Plan mapping of sensitive habitats, special status plants, and wildlife species within the city boundaries and SOI.

Following the database and literature investigation, a visual aerial survey of the city was completed utilizing Google Earth aeriels and existing General Plan Open Space land use designations. CSLS started with parcels currently designated Open Space on the existing General Plan land use map. Those parcels were inventoried to determine current use and current habitat classifications on each parcel. CSLS then searched aerial photographs and identified remaining vacant parcels. For the vacant parcels, CSLS identified the assessor's parcel number (APN), current land use designation, and current habitat classifications on each parcel. All parcels, open space and not open space, are linked to the City's GIS identification number, and the size of each parcel is also provided. Following the aerial inventory of parcels appearing as vacant and designated as Open Space, CSLS spot checked the parcels in the field to confirm the vegetation community on-site.

Analysis

Following the Biological and Natural Resource inventory, an impact analysis was conducted for each focus area. For each parcel analyzed, a determination was made whether the proposed change in land use from existing land use to proposed land use would cause a biological impact. The purpose of the biological assessment was to describe the biological and natural resource inventory within the City and its SOI and provide a summary of natural resources for the entire City as well as its focus areas. For this reason, a complete biological analysis of each parcel was not conducted. The analysis focused on parcels that are designated as Open Space and vacant parcels that would have a change in land use under the GPU.

5.3.4.2 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.3-1: Implementation of the General Plan Update could result in adverse impacts to candidate, sensitive, or special-status species. [Threshold B-1]

Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. Development in areas that contain sensitive species or habitat could have an adverse impact on biological resources. A letter from CDFW (March 26, 2020) in response to the Notice of Preparation identifies five special

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status species that have the potential to exist in the region—steelhead, coast horned lizard, crotch bumble bee, Mexican long-tongued bat, and American peregrine falcon.

A total of 499 parcels are designated as Open Space land use within the city boundaries. An additional 135 parcels within the city boundaries were identified as vacant or containing natural resources but are not designated Open Space. Another four parcels, consisting of 83.37 acres, were identified as vacant parcels outside of the city but within the SOI. The SOI parcels include vacant parcels in the concrete-lined Santa Ana River. Santa Ana and its SOI contain seven types of vegetation communities—riparian, unvegetated streambed, oak woodland, ornamental, ruderal, disturbed, and developed.

~~None of the parcels outside of the focus areas have a proposed land use change as part of this GPU. Nevertheless,~~ The Biological and Natural Resources Report found that, of the parcels outside of the focus areas without an open space land use designation, none have sensitive habitat, native habitat, or any condition under which a biological impact could occur if developed.

The GPU proposes no change in land use designation for parcels identified as open space or vacant parcels within the SOI; therefore, no impacts would occur from the GPU. The GPU proposes no change in General Plan land use designation for the remaining parcels identified as open space or vacant parcels within the city limits.

Focus Areas

Within the five focus areas, a total of 59 parcels were identified, either vacant or designated Open Space. These 59 parcels total 164.42 acres, and 47 parcels are designated Open Space by the existing General Plan land use map. With the proposed General Plan Update, all 47 parcels remain designated Open Space and contain developed, disturbed, ornamental and ruderal vegetation communities. No parcels that are designated as Open Space would change to developable land uses, and no impact would occur. The remaining 12 parcels currently have developable land use designations (Professional and Administrative Office, General Commercial, or Low Density Residential) and are proposed to change to other developable land use designations (Industrial and Urban Neighborhood). These 12 parcels are vacant and have vegetation communities classified as disturbed and ruderal. Since the existing vegetation communities within these 12 parcels are not sensitive, no impact would occur. A discussion for each focus area follows.

Grand Avenue/17th Street Focus Area

The Grand Avenue/17th Street Focus Area consists of 11 parcels that are either designated as Open Space or are vacant. Of the 11 vacant or designated Open Space parcels, 9 parcels are redesignated as part of the GPU. The existing land use designations for these 9 parcels include Professional and Administrative Office, General Commercial, and Low Density Residential. The land use designation on these parcels would change to Urban Neighborhood under the GPU. The vegetation community observed on these parcels is classified as “disturbed” and is not native nor considered to be a sensitive vegetation community. Since the existing vegetation communities are not sensitive, no impact would occur from the proposed land use change. Since the

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9 parcels for the proposed GPU changes would occur to vegetation communities that are not sensitive and non-native, these impacts are not considered significant.

The remaining two parcels are designated Open Space, and the GPU does not propose any revisions to the existing land use designation; therefore, no impacts would occur.

South Main Street Focus Area

The South Main Street Focus Area does not contain any Open Space designated parcels nor vacant lots. Furthermore, due to the built nature of this focus area, no impacts would occur with implementation of the GPU.

55 Freeway/Dyer Road Focus Area

Three parcels within the 55 Freeway/Dyer Road focus area are vacant and have a land use designation of Professional and Administrative Office that would change to Industrial/Flex under the GPU. The vegetation community observed within these three parcels is classified as “ruderal”, which is not native nor considered to be a sensitive vegetation community. Since the existing vegetation communities are not sensitive and non-native, no impact would occur from the proposed land use change.

South Bristol Street Focus Area

The South Bristol Street Focus Area consists of 10 parcels of Open Space designated land use and no vacant parcels. The GPU does not propose revisions to the existing land use designations of these Open Space parcels; therefore, no impacts would occur.

West Santa Ana Boulevard Focus Area

The West Santa Ana Boulevard Focus Area consists of 28 parcels of Open Space designated parcels and no vacant parcels. Of the 28 parcels designated as Open Space the GPU update does not propose any revisions to the existing land use designations; therefore, no impact would occur.

Conclusion

The inventory of existing conditions determined that no parcels with a proposed land use designation that allows for development (i.e., not an open space designation) currently has sensitive vegetation. All parcels currently have ruderal vegetation and little to no biological value. Therefore, there is no current indication that future development in accordance with the GPU would have significant unavoidable biological impacts. However, the programmatic analysis prepared for this General Plan Update was not at the detailed, site-specific analysis required for a specific development project. Site-specific analyses could reveal biological resources not identified in the Biological and Natural Resources Report. Therefore, there is a potential for biological impacts associated with implementation of the GPU. Therefore, implementation of the GPU could result in a potentially significant impact.

The letter received from CDFW states that the Santa Ana River and its tributaries historically supported federally endangered southern California steelhead. CDFW's letter requests that the Draft Program EIR include

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an analysis of any proposed major stream crossings in the context of fish passage, and states that the analysis should include, but not be limited to, steelhead presence or historic presence, existing conditions including habitat and barrier assessments, any known projects to remove barriers or restore habitat that would affect or be affected by this project, and cumulative impacts to steelhead populations and/or habitat resulting from this project. The GPU does not propose any major stream crossings. If any future development project entails improvements for stream crossings (e.g. Santa Ana River and Santiago Creek), the project level CEQA compliance would require a biological resources report that would address potential impacts to endangered species including the California steelhead.

Level of Significance Before Mitigation: Even with the implementation of RR B-1, RR B-2, RR B-4, RR B-5, conservation element policies 2.1 and 2.2, and open space element policy ~~3-6~~ 3.8, Impact 5.3-1 is still potentially significant.

Impact 5.3-2: Development pursuant to the General Plan Update would not impact riparian habitat or other sensitive natural communities. [Threshold B-2]

Parcels identified as riparian vegetation and oak woodland are associated with the Santiago Creek on the northern portion of the city (refer to Figure 5.3-1). These parcels are not in a focus area **and there are no proposed land use changes to these parcels as part of the GPU. ~~None of the parcels outside of the focus areas have a proposed land use change as part of this GPU.~~** None of the focus areas contain riparian or oak woodland. Therefore, implementation of the GPU would have a less than significant impact on riparian or other sensitive natural communities.

Level of Significance Before Mitigation: Less than significant.

Impact 5.3-3: Development pursuant to the General Plan Update would not impact wetlands and jurisdictional waterways. [Threshold B-3]

Wetlands that are next to or hydrologically connected to jurisdictional waterways are protected under the Clean Water Act. Wetlands are identified along the Santa Ana River and Santiago Creek along with channels and ponds throughout the city (USFWS 2020b). The Biological and Natural Resources Report identifies riparian, oak woodland, ornamental, and developed vegetation communities along Santiago Creek, and unvegetated streambed, ornamental, and developed vegetation communities along the Santa Ana River. Channels throughout the city are classified as ornamental, disturbed, and developed. Development of projects pursuant to the GPU would not impact wetlands and jurisdictional waterways since the GPU would not change the land use designations of the San Ana River, Santiago Creek, and channels. Therefore, a less than significant impact would occur.

Level of Significance Before Mitigation: Less than significant.

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Impact 5.3-4: The General Plan Update could affect wildlife movement and impact migratory birds. [Threshold B-4]

The City of Santa Ana is largely urbanized, and migration corridors are generally limited to the Santa Ana River and the Santiago Creek. Development under the GPU would result in the further infill of the city and removal of vacant sites. The GPU would not change land use designations of parcels that encompass the Santa Ana River or the Santiago Creek. However, development under the GPU could further result in vegetation removal, intrusion by humans and pets, and increased noise and air pollutants, which could impact wildlife movement and nesting sites. Therefore, the buildout of the GPU could affect wildlife movement, nesting sites, and migratory birds protected under the Migratory Bird Treaty Act as well as state law.

Level of Significance Before Mitigation: Even with the implementation of RR B-2, conservation element policies 2.1 and 2.2, and open space element policy 3-6 3.8, Impact 5.3-4 is still potentially significant.

Impact 5.3-5: The General Plan Update would not conflict with an adopted NCCP/HCP or local policies or ordinances protecting biological resources. [Thresholds B-5 and B-6]

The City of Santa Ana is not within a NCCP/HCP area, and therefore would not conflict with an adopted NCCP/HCP plan. Buildout under the GPU would be required to comply with all applicable federal and state laws and regulations governing the protection and preservation of wildlife, plants, and habitat. Further development within the city would be required to comply with the City's Municipal Code, including Article VII, Regulation for the Planting, Maintenance, and Removal of Trees. Therefore, the full buildout pursuant to the GPU would not conflict with the provisions of an adopted NCCP/HCP; an approved local, regional, or state habitat conservation plan; or other local tree preservation ordinance or policy.

Level of Significance Before Mitigation: Less than significant.

5.3.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.3-2, 5.3-3, and 5.3-5.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.3-1** Buildout under the General Plan Update could impact plant and animal species and habitat that are sensitive or protected under federal and/or California regulations.
- **Impact 5.3-4** Implementation of the General Plan Update could impact wildlife corridors and nesting sites.

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5.3.6 Mitigation Measures

Impacts 5.3-1 and 5.3-4

BIO-1 For development or redevelopment projects that would disturb vegetated land or major stream and are subject to CEQA, a qualified biologist shall conduct an initial screening to determine whether a site-specific biological resource report is warranted. If needed, a qualified biologist shall conduct a field survey for the site and prepare a biological resource assessment for the project, including an assessment of potential impacts to sensitive species, habitats, and jurisdictional waters. The report shall recommend mitigation measures, as appropriate, to avoid or limit potential biological resource impacts to less than significant.

5.3.7 Level of Significance After Mitigation

Impacts 5.3-1 and 5.3-4 would be less than significant with compliance with all applicable federal, state, and local regulations and incorporation of mitigation measure BIO-1. Impacts 5.3-2, 5.3-3 and 5.3-5 are less than significant prior to mitigation.

5.3.8 References

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