

RBRiggan and Associates

26 June 2006

Ms. Barbara Favors
Code Compliance Officer
San Diego City Fire Department
1010 Third Avenue
San Diego, California 92101

Reference: Scripps Ranch Fire Safe Council Fire Abatement at Urban Interface Scripps Ranch
— Possible Impacts to the California Gnatcatcher (RBR Job No. 1971.22A)

Dear Ms. Favors:

We are writing to address the Scripps Ranch Fire Safe Council's proposed clearing of vegetation along the Scripps Ranch urban interface. It is the intent of the Council to use a goat herd to modify vegetation within 200-feet of residences that back against the existing brush field. We understand that concern has been expressed by City staff that there is a potential for the take of the California Gnatcatcher. While it is not possible to speak in absolutes when dealing with biological systems, we feel that there are a combination of factors that strongly militate against the potential occurrence of breeding California Gnatcatchers (*Polioptila californica*) in the recovering Southern Mixed Chaparral (Holland, 1986; element code 37121) adjacent to the Scripps Ranch Homes. These factors, when taken as a whole, make the potential for a take vanishing close to zero.

Specifically:

1. During a field check of the areas to be cleared on 24 June, it was noted that, within the areas of concern, Coastal Sagebrush (*Artemisia californica*) and California Buckwheat (*Eriogonum fasciculatum*) were rare species, accounting for significantly less than 1-percent of the cover. The California Gnatcatcher is closely tied (in San Diego County) to these two species (see Weaver, 1998 and Grishaver, 1998) during the breeding period. The cited studies and others have shown that the Gnatcatcher rarely utilizes habitats for breeding that do not include these species. Indeed, the majority of Gnatcatcher nests are placed directly in either the California Sagebrush or the California Buckwheat.
2. The areas to be cleared were a hard chaparral prior to the Cedar Fire and they are recovering to a chaparral system at this time (Southern Mixed Chaparral). The California Gnatcatcher rarely utilizes chaparral for breeding unless the stand is associated directly with Sage Scrub habitats (The Author, personal field experience; Campbell, et al., 1998). Since the present stands lack any Sage Scrub character and, given the chaparral character of the surrounding vegetation, the presence of breeding Gnatcatchers is highly unlikely
3. The California Gnatcatcher is non-migratory and exhibits an extraordinary degree of site fidelity. Indeed, it has been suggested (Carlson, 1999 — based on observations of banded birds following the Motte-Rimrock fire) that the birds do not effectively flee fire and probably perish in the burn. In any case, the Gnatcatchers within the footprint of the Cedar Fire would have either been dispersed or killed. Dispersal back into the burn from surrounding territories would be limited due to the normally short dispersal distances (less than a mile; Braden, 1998) and the unsuitability of the vegetation, especially in the year immediately following the fire. The

probability that Gnatcatchers have re-occupied the chaparral vegetation along the Scripps Ranch urban interface is unlikely when one considers dispersal distance for the species and the lack of nearby refugia or sources of re-invasive individuals. And we must also consider the fact that, even if there were Gnatcatchers in the vicinity of the Scripps Ranch urban-interface, the potential to adversely affect them would be extremely limited.

4. The average breeding home range of the Gnatcatcher is 20-acres (see Preston, et al., 1998). Territories are not linear, ergo the clearing would only affect the extreme outer edge of the territory — ostensibly the area least used by the bird.

5. The urban interface is also the area most impacted by edge effects from the adjacent residences. A variety of factors — including noise, night lighting, subsidized predators (dogs, cats and small boys), pesticide drift and others — make the urban interface a marginal habitat for wildlife in general. For example, there are certainly suggestions in the literature (see de Molenaar, 2006) that night lighting has a negative influence on breeding birds.

6. In a normal rainfall year, California Gnatcatchers have fledged off the nest by the end of June (Grishaver, 1998). In wetter years, when the normally summer dormant Coastal Sage Scrub retains a more robust nature well into the summer, the Gnatcatchers may be multiple brooded and may not fledge young until August. This is a normal year, and recent weeks have been at or above normal temperatures. We would anticipate that any nesting Gnatcatchers would have fledged their young by this time.

Collectively these considerations make it highly unlikely that there are any breeding California Gnatcatchers within the anticipated fuel modification zone targeted by the Scripps Ranch Fire Safe Council. We would recommend that the City proceed with the “clearing by goat.”

Sincerely,
Royce B. Riggan, Jr.
Principal
Consulting Biologist

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