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September 17, 2021

Ms. Kristen Forburger City of San Diego MSCP 9485 Aero Drive, M.S. 413 San Diego, CA 92123

Reference: Southwest Village Beyer Boulevard Alternatives-Addendum to Beyer Park Mitigation Plan (RECON Number 8868)

Dear Ms. Forburger:

This memo serves as an addendum to the mitigation program for the proposed Beyer Park provided in the *Enhancement and Restoration of Maritime Succulent Scrub as Habitat for Western Burrowing Owl and Beach Goldenaster for the Beyer Park Development Project, San Diego, California* prepared for the City of San Diego (City) by RECON Environmental, Inc. (RECON) dated August 4, 2020 (Mitigation Plan; RECON 2020). The following analysis was completed to address the need to revise the mitigation area for Beyer Park given changes to the alignment of the Beyer Boulevard extension to be built for the Southwest Village Specific Plan project which conflicts with the originally proposed mitigation area.

The Beyer Park project site is located on undeveloped City park land, southeast of the eastern terminus of Beyer Boulevard in the community of San Ysidro, in the city of San Diego. The mitigation site originally developed for the project is located immediately east of the Beyer Park development footprint. As part of the processing of the Southwest Village Specific Plan and proposed development of a residential portion of the Specific Plan, Tri Pointe Homes is required to design and construct an extension of Beyer Boulevard to connect San Ysidro to the Specific Plan area. The applicant has coordinated extensively with the City, U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW) regarding the alignment of the roadway in order to minimize impacts associated with the Beyer Boulevard extension. The ultimate alignment depicted in this memo was selected for its ability to significantly minimize impacts to biological resources along the length of Moody Canyon.

The proposed realignment of the Beyer Boulevard extension conflicts with the original design of the Beyer Park Mitigation Plan. As such, this analysis serves to provide an alternative mitigation configuration that will meet the mitigation requirements of the Beyer Park development while accommodating the proposed alignment for the Beyer Boulevard extension. In particular, the Beyer Boulevard alignment was redesigned based on comments received from the City, USFWS, and CDFW, in order to minimize impacts to Moody Canyon and sensitive resources and to increase wildlife movement. The original alignment was located within a landslide-susceptible area. Redesign efforts resulted in the roadway being shifted south to avoid key landslide susceptible areas, which also brought the alignment out of Moody Canyon and significantly minimized slope grading in the canyon. The shift of the roadway to the south effectively bifurcates the original proposed mitigation area for Beyer Park, leaving a small parcel of open space (including MHPA lands) to the north of the roadway and open space to the south. This analysis looked at the available open space and assessed the most appropriate new configuration of mitigation lands for Beyer Park based on habitat value, MHPA status, connectivity to adjacent open space lands, and accessibility for restoration efforts.

As the redesigned Beyer Boulevard would also affect the original designated location of species-specific mitigation for beach goldenaster (*Heterotheca sessiliflora* ssp. *sessiliflora*) and western burrowing owl (*Athene cunicularia*

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hypugaea), we evaluated the best areas where these species could be suitably relocated. The approach for relocation of the beach goldenaster relied on an assessment of both soils and topography as well as habitat availability.

The approach for relocation of the burrowing owl artificial burrows is based on a field visit made in May 2019 with Kevin Clark, San Diego Natural History Museum. At that time, an evaluation of the open space for suitability for placement of artificial burrows and associated berm was made and several parameters were discussed, including the distance and topographic isolation from the Beyer Park, the suitability of the topography to support burrowing owl foraging, percent native coverage, and adjacency to other open space areas. Several locations were evaluated for suitability and a site ultimately chosen. A follow-up visit was made by RECON biologists in May 2021 to reevaluate some of the additional suitable burrowing owl areas within the reconfigured mitigation area, applying the same parameters. Two potential locations were identified, which were evaluated by City staff in August 2021 and a preferred location chosen.

The primary change represented by this addendum is the reconfiguration of the mitigation layout and location of species-specific mitigation areas, as detailed below. All other conditions set forth in the Mitigation Plan remain the same.

Revised Mitigation for Direct Impacts to Sensitive Vegetation

Figure 1 shows the reconfigured Mitigation Plan. The reconfigured mitigation area is 14.18 acres and would now occur in two main areas. A smaller northern parcel located north of the Beyer Boulevard extension (1.75 acres) and a larger, southern parcel that is located south of Beyer Boulevard extension and east and south of Beyer Park (12.43 acres). The inclusion of the smaller, northern parcel was based on the presence of Multi-Habitat Planning Area (MHPA) lands and the parcel's proximity to County of San Diego Preserve lands to the north and east. In addition, the parcel supports a large population of the Otay tarplant (*Deinandra conjugens*) (State endangered, federally threatened, and City narrow endemic). While Beyer Park would not impact this species and thus is not required to provide mitigation, the designation of this area within the mitigation site boundary serves to further protect these sensitive biological resource and increases the habitat value of this smaller northern parcel.

The southern parcel is largely the same as the original plan with the addition of lands that were added to the southwestern border, located south of the Beyer Park. In addition, refinements to the regional trail plan were incorporated with a small buffer provided around each of the trails to remain in place to allow for any trail improvements (see Figure 1). These trails are not included as part of the overall mitigation area.

Tables 1 and 2 from the Mitigation Plan have been updated to demonstrate how the new mitigation site boundary meets the 12.70-acre mitigation requirement for direct impacts to vegetation. A total of 14.18 acres of mitigation is proposed and will include mitigation both inside and outside MHPA lands and will include both Tier I (maritime succulent scrub) and Tier II (Diegan coastal sage scrub) enhancement. Mitigation for Tier II vegetation impacts will also occur through the restoration of disturbed lands to maritime succulent scrub (Tier I). The total mitigation acreage includes an additional 1.48 acre of disturbed land that will be restored in excess of the 12.70-acre mitigation requirement. This is intended to provide excess mitigation in the event some of the edge areas near the trails and roads do not achieve success criteria.

The northern parcel includes several areas mapped as disturbed land that will be enhanced through the placement of cactus cuttings and native seed. These areas are small and narrow and the cactus cuttings and seed will not require supplemental irrigation to become established. Coast cholla (*Cylindopuntia prolifera*) cuttings will either be salvaged from the project impact area or surrounding open space, as available, or purchased from a native plant nursery, consistent with the Mitigation Plan.

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Figure 1 identifies the location of the trails proposed to remain open and the existing trails that are proposed to be closed during enhancement and restoration activities.

Revised Mitigation for Direct Impacts to Sensitive Species

This addendum also serves to update the location of the proposed mitigation for beach goldenaster restoration and western burrowing owl. The original mitigation locations for these two species in the Mitigation Plan fall within the proposed alignment for the Beyer Boulevard extension. Figure 1 shows the mitigation locations for these species. Details for each are provided below.

Beach Goldenaster

The beach goldenaster restoration area will be shifted to an area south of the Beyer Boulevard extension and will span both restoration and enhancement areas. The soils in this portion of the site are mapped as Olivenhain cobbly loam, 30-50 percent slopes. This soil type is consistent among the original location where the plant was identified, the original mitigation area, and the revised mitigation area (Photographs 1 and 2). In addition, the revised mitigation area is located along the same slope as the original location, placed south outside of the reconfigured Beyer Boulevard alignment.

Western Burrowing Owl

The western burrowing owl mitigation area has also shifted south. Two alternative locations were originally proposed and a preferred alternative chosen based on a field visit with City staff in August 2021 (see Figure 1). The new location is of sufficient size and topography to install a berm and three artificial burrows, as described in the Mitigation Plan (RECON 2020). The site is located within the MHPA at the juncture of several trail segments that are proposed to be closed. This area supports disturbed maritime succulent scrub and is heavily inundated with weeds, that will be subject to extensive weed removal as part of the restoration and enhancement efforts (Photograph 3). Thus, earthwork for burrow and berm installation is not expected to directly affect an existing high quality native area.

Proposed burrow locations will provide a natural viewpoint for burrowing owls to observe foraging habitat within and adjacent to the mitigation site while the view of Beyer Park will be obstructed by natural topography. The soils and topography of the new proposed burrow locations is similar or improved from the original location. The revised location is within the same Olivenhain cobbly loam as the original location, however, the slopes are mapped as 9-30 percent slopes as opposed to 30-50 percent slopes. These gentler slopes will provide improved owl vantage points and a more expansive area for fossorial mammal burrowing. Prior to being closed, the existing trail segments will provide a location for construction of the berm as well as site access for construction and maintenance of the mitigation area. The berm itself will aid in the ultimate closing of these trails.

The berm will not exceed 12 feet x 24 feet in size and the artificial burrows will be approximately 10 feet x 12.5 feet with 10-20 feet of spacing between each burrow and the berm. Figure 1 provides a conceptual placement design, utilizing the existing trail to the extent possible. A 10-foot-wide access path is also depicted that would accommodate the equipment required to install the berm and burrows (e.g., small excavator and skid steer). This access path would follow existing trails for the majority of the route. At the point where the existing trail is not available, the equipment will be directed by a qualified restoration biologist to the least impactful path. The level of impact from equipment access is expected to be minimal and will not require the removal of vegetation. Any vegetation that might be lightly trampled through equipment access should readily resprout and recover, facilitated by the restoration activities (watering and weeding) planned for the mitigation site. The installation of the owl features is considered to be a beneficial action for restoration purposes and not considered to be an impact to the disturbed maritime succulent

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scrub; however, the work will be monitored by a qualified restoration biologist and conducted by a qualified restoration contractor to ensure that the installation area is minimized to the maximum extent possible.

If you have any questions regarding this letter, please do not hesitate to contact Wendy Loeffler at 619-308-9333 extension 113 or wloeffler@reconenvironmental.com or Meagan Olson at 619-308-9333 extension 119 or molson@reconenvironmental.com.

Sincerely,

Wendy Loeffler Senior Biologist

Myn Olson

Meagan Olson Restoration Ecologist

cc: Jimmy Ayala, Tri Pointe Homes
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| REVISED Table 2 Mitigation Summary | | | | |
|--|--------------------------------------|--|--|--|
| | Fulfillment of Vegetation Mitigation | | | |
| Mitigation Method | (acres) | | | |
| Restoration ¹ | 2.24 | | | |
| Enhancement ² | 10.46 | | | |
| Additional restoration of disturbed land ³ | 1.48 | | | |
| Total | 14.18 | | | |
| ¹ Restoration will consist of converting disturbed lands to Tier I maritime succulent scrub appropriate for burrowing owl foraging and nesting. Restoration and enhancement acreages combined meet the required mitigation for impacts to Tier I and Tier II habitats. ² Enhancement will be focused on improving maritime succulent scrub appropriate for burrowing owl foraging and nesting. Restoration and enhancement acreages combined meet the required mitigation for impacts to Tier I and Tier II habitats. | | | | |

³The total mitigation acreage includes an additional 1.48 acres of disturbed land will be restored in excess of the 12.70-acre mitigation requirement. This is intended to provide excess mitigation in the event some of the edge areas near the trails and roads do not achieve success criteria.

| | REVISED 1 | Table 3 | | | | | |
|--|-----------------------|-------------------------------|-------------|-------------------------------|-------------|--|--|
| Required and Proposed Mitigation for Burrowing Owl Impacts | | | | | | | |
| | | | | Required Amount of Occupied | | | |
| | Direct Impacts to | | | Habitat to Fulfill Mitigation | | | |
| | Occupied BUOW | Mitigation Ratio ¹ | | (acres) ² | | | |
| Vegetation Community | Habitat- Outside MHPA | Inside the | Outside the | Inside the | Outside the | | |
| by City of San Diego Tier | (acres) | MHPA | MHPA | MHPA | MHPA | | |
| Tier I | | | | | | | |
| Maritime succulent scrub | 0.20 | 1:1 | | 0.20 | 0 | | |
| Disturbed maritime succulent scrub | 3.91 | 1:1 | | 3.91 | 0 | | |
| Tier II | | | | - | ' | | |
| Diegan coastal sage scrub | 0.18 | 1:1 | | 0.18 | 0 | | |
| Disturbed Diegan coastal sage | 4.28 | 1:1 | | 3.00 | | | |
| | | | 1.5:1 | | 1.92 | | |
| Tier IV | | | | | | | |
| Disturbed land | 4.89 | 0:1 | 0:1 | 0 | 0 | | |
| Ornamental plantings | 0 | 0:1 | 0:1 | 0 | 0 | | |
| Other Land Cover Types | | | | | | | |
| Urban/Developed Land | 0.09 | 0:1 | 0:1 | 0 | 0 | | |
| TOTAL | 13.55 | | | 9.21 | | | |
| 1 | | | | | | | |

¹Mitigation ratios are consistent with Table 3 of the Land Development Code Biology Guidelines.

²9.21 acres of occupied habitat is required for mitigation. Any areas successfully preserved in excess of the required amount may be utilized by the City for burrowing owl mitigation.

