



*An Employee-Owned Company*

August 12, 2022

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

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

Dear Ms. Forburger:

This memo serves as a revised 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). A previous addendum was prepared September 17, 2021 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.

This current revised addendum was prepared to address the presence of federal and state jurisdictional waters that run through the northern mitigation area. A 15-foot buffer was identified on each side of the drainage to ensure that this resource will be avoided during mitigation activities. The total mitigation credits were reduced accordingly, and this buffered area will not be subject to restoration activities. In addition, this memo analyzes minor changes to the Beyer Boulevard alignment that resulted in a slight increase in the total preserve area and an increase in the amount of preserved Multi-Habitat Planning Area (MHPA), which lowered the overall mitigation requirement. All other conditions set forth in the Mitigation Plan and previous addendum remain the same.

### **Revised Mitigation for Direct Impacts to Sensitive Vegetation**

Figure 1 shows the reconfigured Mitigation Plan. The reconfigured mitigation area is 14.37 acres and still occurs in two main areas; however, the northern parcel is now bisected by the existing drainage and buffer. The two smaller northern parcels are located north of the Beyer Boulevard extension (2.23 acres) and the larger, southern parcel that is located south of Beyer Boulevard extension and east and south of Beyer Park (12.14 acres).

Tables 1 and 2 from the Mitigation Plan have been updated to demonstrate how the new mitigation site boundary meets the 12.62-acre mitigation requirement for direct impacts to vegetation. A total of 14.37 acres of mitigation is proposed and will include mitigation both inside and outside MHPA lands as well as 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 1.75 acres of disturbed land that will be restored in excess of the 12.62-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.

Ms. Kristen Forburger  
Page 2  
August 12, 2022

### Revised Mitigation for Direct Impacts to Sensitive Species

There are no changes to the proposed mitigation for beach goldenaster (*Heterotheca sessiliflora* ssp. *sessiliflora*) restoration and western burrowing owl (*Athene cunicularia*). Figure 1 shows the mitigation locations for these species. Table 3 demonstrates that the proposed mitigation lands provide enough preserved western burrowing owl suitable habitat inside and outside MHPA lands.

### Revised Mitigation for Jurisdictional Waters Protection


The Mitigation Plan area has been revised to identify the existing federal and state jurisdictional waters and provides a 15-foot buffer surrounding the resource. The drainage will be protected from mitigation activities through the implementation of standard resource protection measures (e.g., resource flagging, biological monitoring during construction), as indicated in Mitigation Measure Bio-1 of the Final Mitigated Negative Declaration.

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](mailto:wloeffler@reconenvironmental.com) or Meagan Olson at 619-308-9333 extension 119 or [molson@reconenvironmental.com](mailto:molson@reconenvironmental.com).

Sincerely,



Wendy Loeffler  
Senior Biologist



Meagan Olson  
Restoration Ecologist

cc: Jimmy Ayala, Tri Pointe Homes  
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Maya Mazon, City of San Diego Engineering and Capital Projects Department  
James Arnhart, City of San Diego Engineering and Capital Projects Department  
Mark Berninger, City of San Diego Parks Department  
Brooke Peterson, RICK Engineering

REVISED Table 1

Direct Impacts to Vegetation and Associated Mitigation

Vegetation Community by City of San Diego Tier	Direct Impacts to Vegetation-Outside MHPA (acres)	Mitigation Ratios		Required Mitigation (acres)		Proposed Enhancement (acres)	Proposed Restoration (acres)	Total Proposed Mitigation (acres)
		Inside the MHPA	Outside the MHPA	Preserved Inside the MHPA	Preserved Outside the MHPA			
<b>Tier I</b>								
Maritime succulent scrub	0.91	1:1		0.91	0	0.91	0	0.91
Disturbed maritime succulent scrub	4.86	1:1		4.86	0	4.86	0	4.86
<i>Subtotal (Tier I)</i>	<i>5.77</i>	--	--	<i>5.77</i>	<i>0</i>	<i>5.77</i>	<i>0</i>	<i>5.77</i>
<b>Tier II<sup>1</sup></b>								
Diegan coastal sage scrub	1.41	1:1		1.41	0	1.41 <sup>1</sup>		1.41
Disturbed Diegan coastal sage scrub	4.29	1:1		2.00 <sup>2</sup>		0.12 <sup>1</sup>	1.88 <sup>3</sup>	5.44
			1.5:1		3.44 <sup>1,3</sup>		3.19 <sup>1</sup>	
<i>Subtotal (Tier II)</i>	<i>5.70</i>	--	--	<i>3.41</i>	<i>3.44</i>	<i>4.72<sup>1</sup></i>	<i>2.73</i>	<i>6.85</i>
<b>Tier IV</b>								
Disturbed land	5.05	0:1	0:1	0	0	0	1.75 <sup>4</sup>	1.75 <sup>4</sup>
Ornamental plantings	0	0:1	0:1	0	0	0	0	0
<b>Other Land Cover Types</b>								
Urban/Developed Land	0.64	0:1	0:1	0	0	0	0	0
<i>Subtotal (Tier IV)</i>	<i>5.69</i>	--	--	<i>0</i>	<i>0</i>	<i>0</i>	<i>1.75</i>	<i>1.75</i>
<i>Subtotal (All Tiers)</i>	<i>17.16</i>	--	--	<i>9.18</i>	<i>3.44</i>	<i>10.49</i>	<i>3.88</i>	<i>14.37</i>
<b>Total</b>	<b>17.16</b>	--	--		<b>12.62</b>	<b>10.49</b>	<b>3.88<sup>3</sup></b>	<b>14.37</b>

<sup>1</sup>Tier II habitat that will be mitigated through a combination of preservation of Tier II and Tier I habitat.

<sup>2</sup>Tier II habitat that will be mitigated with a combination of preservation of Tier I habitat and restoration of Tier I maritime succulent scrub (MSS) habitat through conversion of disturbed lands. Due to surrounding MSS habitat it is likely that historically this habitat would have been MSS prior to routine disturbance.

<sup>3</sup>Restoration of Tier I maritime succulent scrub habitat will be accomplished through conversion of disturbed lands.

<sup>4</sup>The total mitigation acreage includes an additional 1.75 acres of disturbed land will be restored in excess of the 12.62-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 Table 2 Mitigation Summary	
Mitigation Method	Fulfillment of Vegetation Mitigation (acres)
Restoration <sup>1</sup>	2.13
Enhancement <sup>2</sup>	10.49
Additional restoration of disturbed land <sup>3</sup>	1.75
<b>Total</b>	<b>14.37</b>
<p><sup>1</sup>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.</p> <p><sup>2</sup>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.</p> <p><sup>3</sup>The total mitigation acreage includes an additional 1.75 acres of disturbed land will be restored in excess of the 12.62-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.</p>	

REVISED Table 3 Required and Proposed Mitigation for Burrowing Owl Impacts					
Vegetation Community by City of San Diego Tier	Direct Impacts to Occupied BUOW Habitat - Outside MHPA (acres)	Mitigation Ratio <sup>1</sup>		Required Amount of Occupied Habitat to Fulfill Mitigation (acres) <sup>2</sup>	
		Inside the MHPA	Outside the MHPA	Inside the MHPA	Outside the MHPA
<b>Tier I</b>					
Maritime succulent scrub	0.20	1:1		0.20	0
Disturbed maritime succulent scrub	3.91	1:1		3.91	0
<b>Tier II</b>					
Diegan coastal sage scrub	0.18	1:1		0.18	0
Disturbed Diegan coastal sage	4.28	1:1		3.01	
			1.5:1		1.91
<b>Tier IV</b>					
Disturbed land	4.89	0:1	0:1	0	0
Ornamental plantings	0	0:1	0:1	0	0
<b>Other Land Cover Types</b>					
Urban/Developed Land	0.09	0:1	0:1	0	0
<b>TOTAL</b>	<b>13.55</b>	--	--	<b>9.21</b>	
<p><sup>1</sup>Mitigation ratios are consistent with Table 3 of the Land Development Code Biology Guidelines.</p> <p><sup>2</sup>9.21 acres of occupied habitat are required for mitigation. Any areas successfully preserved in excess of the required amount may be utilized by the City for burrowing owl mitigation.</p>					

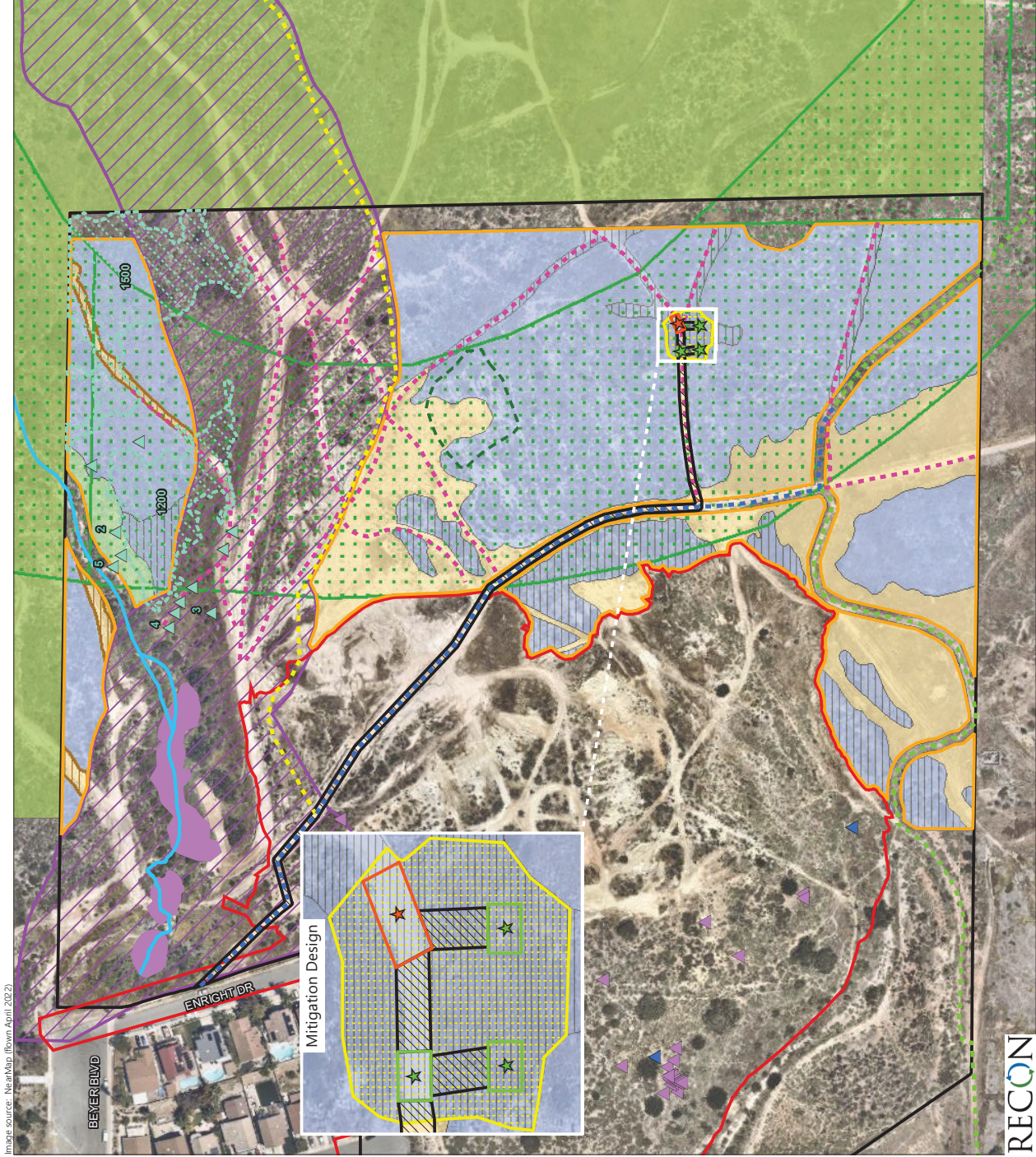


Image source: NearMap (down April 2022)

- Mitigation Site
- Project Parcels Boundary
- Beyer Park Development Project
- Beyer Boulevard Limits of Disturbance
- City of San Diego MHPA
- County Preserve
- Mitigation Design**
- Proposed Artificial Owl Burrow Locations
- Proposed Earthen Berm Location
- Proposed Burrowing Owl Mitigation Area
- Proposed Beach Goldenaster Mitigation Location
- Equipment Access Corridor
- 10' wide for burrow and berm installation; no clearing, grubbing, or grading)

- Plants Recommended for Salvage**
- Fish-hook Cactus
- San Diego Barrel Cactus

- Trail Plan**
- Trail Within Beyer Boulevard Manufactured Slope
- New Trail
- Trail Within Existing Disturbance
- Trails to be Closed

- Sensitive Plant Species Observations**
- Otay tarplant

- Federal and State Waters**
- Non-wetland Waters
- Wetland Waters

- Vegetation Communities/Land Cover Types**
- Tier I**
- Maritime Succulent Scrub (Enhancement Areas)
- Disturbed Maritime Succulent Scrub (Enhancement Areas)
- Tier II**
- Diegan Coastal Sage Scrub (Enhancement Areas)
- Tier IV**
- Disturbed Land (Restoration)
- Disturbed Land (Enhancement Areas - Cactus Cuttings + Seeding)



FIGURE 1  
Revised Mitigation Design