Biological Technical Report for the Britannia Airway Logistics Center Project

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- D Burrowing Owl Survey Report
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1.0 INTRODUCTION

This report describes existing biological conditions on the approximately 37.66-acre Britannia Airway Logistics Center Project (project) site and provides the City of San Diego (City) and project applicant with information necessary to assess impacts to biological resources under the California Environmental Quality Act (CEQA) and City, State, and federal regulations.

1.1 PROJECT LOCATION AND SITE DESCRIPTION

The project site is vacant land located at 5761 Airway Road in the City. It is bordered to the north by Airway Road, to the south by auto auction house properties, to the east Britannia Boulevard, and to the west by Cactus Road (Figures 1 and 2). The parcel (APN 646-100-74-00) is located within the Otay Mesa Community Plan boundaries and is in the southeast quarter of Section 33 in Township 18 South, Range 1 West of the U.S. Geological Survey (USGS) Otay Mesa 7.5-minute quadrangle.

The project site is not located within or adjacent to the City's Multiple Species Conservation Plan (MSCP) Multi-Habitat Planning Area (MHPA), and it is outside the coastal zone. The nearest MHPA land occurs approximately 1,000 feet to the west in Spring Canyon (Figure 2).

1.2 PROJECT DESCRIPTION

The project applicant is proposing to develop Britannia Airway Logistics Center on approximately 32.55 net acres south of Airway Road, between Britannia Boulevard and Cactus Road APN # 646-100-74-00 in the Otay Mesa Community Planning Area. This area is within the larger 37.66 acre impacted Study Area. The project will include fenced truck/trailer parking for up to 9 tenants/users. Each tenant/user will have a modular trailer office of approximately 1,440 square feet with 3 vehicle parking spaces. The total truck/trailer parking spaces will be 895 spaces. The project will improve the abutting frontages of Airway Road, Cactus Road and Britannia Boulevard, consistent with the Otay Mesa Community Plan Update (OMCPU; adopted March 11, 2014). Additionally, the project will provide landscaping and an eight-foot-high perimeter fence abutting the public rights-of-ways.

The City's Standard Biological Resource Protection Measures, which are implemented, as applicable prior to, during, and post construction, will be conditions of approval of the project. These measures may include, for example, a pre-construction meeting with a Qualified Biologist and construction monitoring by a Qualified Biologist.



2.0 METHODS AND SURVEY LIMITATIONS

2.1 LITERATURE REVIEW

Prior to conducting its field investigations, Alden Environmental, Inc. (Alden) performed searches of California Department of Fish and Wildlife (CDFW) California Natural Diversity Database and the U.S. Fish and Wildlife Service (USFWS) database for information regarding sensitive species known to occur within an approximately 0.25-mile vicinity of the site. Historic aerials also were reviewed for the site (Nationwide Environmental Title Research, LLC [NETR] 2021).

2.2 BIOLOGICAL SURVEYS

Vegetation was mapped, and focused surveys for the burrowing owl (*Athene cunicularia*; BUOW) and Otay tarplant (*Deinandra conjugens*) were conducted. A Quino checkerspot butterfly (*Euphydryas editha quino*) site assessment was also conducted during the vegetation mapping. The vegetation mapping included a search for potential Waters of the U.S., Waters of the State, and City Wetlands, as well as water-holding basins that could support species of federal-listed fairy shrimp). All site visits included looking for sensitive plant and/or animal species.

Table 1 presents information for the surveys/site visits. Lists of plant and animal species observed or detected during the surveys/site visits is provided in Appendices A and B, respectively. Representative site photographs were taken and are provided in Appendix C.

Table 1						
SURVEY INFORMATION						
Date	Personnel	Purpose ¹	Survey Conditions Start/Stop			
2/21/21	Greg Mason	Vegetation mapping and biological resources assessment (including Quino checkerspot butterfly site assessment)	Clear, 70°F, wind 0-3 mph/ Clear, 73°F, wind 0-3 mph			
2/22/2021	Greg Mason	BUOW survey (1 of 4)	Overcast, 62°F, wind 0 mph/ Partly cloudy, 65°F, wind 0 mph			
4/17/2021	Greg Mason	BUOW survey (2 of 4)	Partly cloudy, 55°F, wind 0 mph/ Partly cloudy, 59°F, wind 0 mph			
6/13/21	Greg Mason	BUOW survey (3 of 4)	Overcast, 61°F, wind 0-1 mph/ Overcast, 64°F, wind 0-1 mph			
7/10/2021	Greg Mason	BUOW survey (4 of 4) Focused Otay tarplant (<i>Deinandra conjugens</i>) survey	Clear, 70°F, wind 0-5 mph/ Clear, 65°F, wind 0-5mph			
12/8/2021	Greg Mason	Confirm vegetation mapping and take additional photographs	Clear, 69°F, wind 0-3 mph/ Clear, 69°F, wind 0-3mph			

¹Sensitive plant and/or animal species also were searched for opportunistically during each site visit.







2.2.1 Vegetation Mapping and Biological Resources Assessment

Vegetation mapping was conducted on February 21, 2021 and revised on December 8, 2021. Mapping took into account the City's defined differentiation between non-native grassland and other disturbed areas from Attachment II.A.1 (i.e., Map Submissions and Methodology, Problem Mapping Areas, Non-Native Annual Grasslands vs. Other Disturbed Areas [Ruderal, Agricultural/Fallow] on page 98 of the City's 2018 Biology Guidelines). That is, the relative percent cover of herbaceous species was used to distinguish between the two, and non-native grassland on the project site was mapped where non-native grass species comprised a relative cover of 50 percent or more.

Additionally, the site was searched for evidence of potential federal, State, and/or City wetlands (including vernal pools) and non-wetland waters of the U.S. and State during in February 2021.

Lastly, a biological resources assessment of the site during the February 21, 2021 site visit was conducted to determine if focused sensitive species surveys were warranted based on the field conditions including the vegetation communities present and the soils on site. Based on the assessment, it was determined that the site should be surveyed for Otay tarplant (as presented below in Section 2.2.2 under Sensitive Plant Species). See Section 2.2.2 of this report for information on the Quino checkerspot butterfly habitat assessment.

2.2.2 <u>Sensitive Species</u>

Sensitive species are those that are considered federal, State, or California Native Plant Society (CNPS) rare, threatened, or endangered; MSCP Narrow Endemics; or MSCP Covered Species. For simplicity, "sensitive" may be used throughout this document to refer to any of these categories.

Sensitive Plant Species

Sensitive plant species were searched for opportunistically during all of the site visits; however, spring and summer are the time period when most annual species bloom. Therefore, sensitive plant species were particularly looked for during the April 17, 2021 site visit. Since the site supports soils with a clay component and grassland, which is potential habitat for Otay tarplant, particular attention was paid to looking for this federal- and State-listed plant not only in April 2021 but also on June 13, 2021 during its blooming period (typically May to June). Additionally, a follow-up survey for sensitive plant species, including Otay tarplant, was conducted on the site on July 10, 2021. Prior to these site visits, the Cross Border Xpress OTN Parcel Project site (approximately 0.65-mile to the southeast) where Otay tarplant was found in 2018 was visited to determine if Otay tarplant was in flower. Since Otay tarplant was observed in flower on the Cross Border Xpress site, it was considered reasonable to assume that Otay tarplant would also have been in flower on the Britannia site if present; therefore, the timing was considered right for finding the species should it be on site.

Burrowing Owl

A focused BUOW survey with four site visits on separate days was conducted according to the survey methods in the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012; Appendix D; Table 1).



Potential BUOW habitat was examined by walking transects across the site to search surveyed for BUOW and potential burrows or perches that could be used by the BUOW. BUOWs are known to occupy California ground squirrel (*Otospermophilus beecheyi*) burrows; therefore, particular attention was paid to any areas along fence lines or other locations where squirrel activity was observed or is likely to occur. Dirt piles, drainages, and culverts, if present, were also examined as these sites can often provide cavities that can support the species. The determination of BUOW presence is made by direct BUOW observation or by the presence of BUOW signs such as, but not necessarily limited to, excavated soil, whitewash (excrement), castings (pellets), and/or feathers.

Quino Checkerspot Butterfly

A site assessment was conducted on February 21, 2021 during the vegetation mapping effort and in accordance with the Quino Checkerspot Butterfly Survey Guidelines (USFWS 2014). The site was walked, and potential Quino checkerspot butterfly resources (open areas, host plants, nectar resources, etc.) were searched for. Characteristic Quino habitat¹ and larval host plants (i.e., dwarf plantain [*Plantago erecta*] and owl's clover [*Castilleja exserta*] were not observed. Since the parcel was determined to have minimal potential for the QCB, a subsequent focused survey for the butterfly was not conducted.

2.2.3 <u>Survey Limitations</u>

Sensitive species surveys were conducted during appropriate times of year and cover the activity periods for most species. Noted animal species were identified by direct observation, vocalizations, or the observance of scat, tracks, or other signs. However, the lists of species identified in Appendices A and B are not necessarily a comprehensive account of all species that utilize the site as species that are nocturnal, secretive, or seasonally restricted may not have been observed/detected. The species that are sensitive and that may have potential to occur on site, however, are still addressed in this report in Section 4.5.2, *Sensitive Plant Species*, Section 4.5.3, *Sensitive Animal Species*, and Section 6.1.4, *Direct Impacts to Sensitive Species with Potential to Occur*.

2.2.4 <u>Nomenclature</u>

Nomenclature used in this report is from the following sources: City Biology Guidelines (City 2018) and the City's MSCP Subarea Plan (City 1997a); Holland (1986); Oberbauer et al. (2008); Hickman, ed. (1993); CNPS (2021); Crother (2008); American Ornithological Society (2021); Jones, et al. (1992); and CDFW (2021).



¹ According to the USFWS, "Quino checkerspot butterfly habitat is characterized by patchy shrub or small tree landscapes with openings of several meters between large plants, or a landscape of open swales alternating with dense patches of shrubs; such habitats are often collectively termed 'scrublands.' Quino will frequently perch on vegetation or other substrates to mate or bask, and they require open areas to facilitate movement. Optimal habitat appears to contain little or no invasive exotic vegetation." (https://www.fws.gov/story/quino-checkerspot-butterfly)

3.0 REGULATORY CONTEXT

3.1 REGULATORY ISSUES

Biological resources that would be impacted on site are subject to regulatory administration by the federal government, State of California, and City as follows.

3.1.1 <u>Federal</u>

Endangered Species Act

The federal Endangered Species Act (FESA) designates threatened and endangered animals and plants and provides measures for their protection and recovery. "Take" of listed animal species and of listed plant species in areas under federal jurisdiction is prohibited without obtaining a federal permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." Harm includes any act that actually kills or injures fish or wildlife, including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife. Activities that damage the habitat of (i.e., harm) listed wildlife species require approval from the USFWS for terrestrial species. The FESA also generally requires determination of Critical Habitat for listed species. If a project would involve a federal action potentially affecting Critical Habitat, the federal agency would be required to consult with USFWS. No federal-listed species or Critical Habitat occurs on site.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others (including those that are not sensitive; see Section 4.5.3, *Sensitive Animal Species*, for an explanation of which species are sensitive). Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country, and is enforced in the United States by the USFWS. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). As a general/standard condition, the project must comply with the MBTA.

3.1.2 State of California

California Environmental Quality Act

Primary environmental legislation in California is found in the CEQA and its implementing guidelines (State CEQA Guidelines), requiring that projects with potential adverse effects or impacts on the environment undergo environmental review. Adverse impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations. The City is the Lead Agency under the CEQA for the proposed project, and this report is part of that environmental review process.



California Fish and Game Code

Pursuant to California Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS. As a general/standard condition, the project must comply with California Fish and Game Code Sections 3503.5.

3.1.3 City of San Diego

Multiple Species Conservation Program

The City, USFWS, CDFW, and other local jurisdictions joined together in the late 1990s to develop the MSCP, a comprehensive program to preserve a network of habitat and open space in the region and ensure the viability of (generally) upland habitat and species, while still permitting some level of continued development. The City's MSCP Subarea Plan (1997a) was prepared pursuant to the outline developed by USFWS and CDFW to meet the requirements of the State Natural Communities Conservation Planning (NCCP) Act of 1992. Adopted by the City in March 1997, the City's Subarea Plan forms the basis for the MSCP Implementing Agreement, which is the contract between the City, USFWS, and CDFW (City 1997b). The Implementing Agreement ensures implementation of the City's Subarea Plan and thereby allows the City to issue "take" permits under the FESA and State Endangered Species Act to address impacts at the local level. Under the FESA, an Incidental Take Permit is required when non-federal activities would result in "take" of a threatened or endangered species. A Habitat Conservation Plan, such as the City's MSCP Subarea Plan, must accompany an application for a federal Incidental Take Permit. In July 1997, the USFWS, CDFW, and City entered into the 50-year MSCP Implementing Agreement, wherein the City received its FESA Section 10(a) Incidental Take Permit (City 1997b).

Pursuant to its MSCP permit issued under Section 10(a), the City has incidental "take" authority over 85 rare, threatened, and endangered species including regionally sensitive species that it aims to conserve (i.e., "MSCP Covered Species"). "MSCP Covered" refers to species that are covered by the City's federal Incidental Take Permit and considered to be adequately protected within the MHPA. Special conditions apply to Covered Species that would be potentially impacted including, for example, designing a project to avoid impacts to Covered Species in the MHPA where feasible. Outside the MHPA, projects must incorporate measures (i.e., Area Specific Management Directives; ASMDs) for the protection of Covered Species as identified in Appendix A of the City's Subarea Plan.



The ASMDs for the BUOW must include: enhancement of known, historical, and potential BUOW habitat; and management for ground squirrels (the primary excavator of BUOW burrows). Enhancement measures may include creation of artificial burrows and vegetation management to enhance foraging habitat. Management plans must also include: monitoring of BUOW nest sites to determine use and nesting success; predator control; establishing a 300-footwide impact avoidance area (within the preserve) around occupied burrows. The BUOW was not found on site nor was evidence of BUOW use/occupation of the site found. Also, the species has not been historically reported to the CNDDB on site.

In addition to identifying preserve areas within the City (and guiding implementation of the MSCP within its corporate boundaries), the City's Subarea Plan also regulates effects on natural communities throughout the City.

Multi-Habitat Planning Area

The MHPA was developed by the City in cooperation with the USFWS, CDFW, property owners, developers, and environmental groups using the Preserve Design Criteria contained in the MSCP Plan, and the City Council-adopted criteria for the creation of the MHPA.

MHPA lands are large blocks of native habitat that have the ability to support a diversity of plant and animal life and, therefore, have been included within the City's Subarea Plan for conservation. The MHPA also delineates core biological resource areas and corridors targeted for conservation as these lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. The project site is not within or adjacent to the MHPA.

MHPA Land Use Adjacency Guidelines

Development adjacent to the MHPA must ensure that indirect impacts to the MHPA are minimized. Section 1.4.3 of the City's Subarea Plan outlines the requirements to address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development. The project site is not adjacent to the MHPA. **Environmentally Sensitive Lands Regulations**

Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2018) as outlined in the City's Municipal Code Environmentally Sensitive Lands (ESL) Regulations (Chapter 14, Article 3, Division 1). ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains (San Diego Municipal Code [SDMC] 143.0110).

The ESL regulations also specify development requirements inside and outside of the City's preserve, the MHPA. Inside the MHPA, development must be located in the least sensitive portion of a given site; outside of the MHPA, development must avoid wetlands and non-MSCP Covered Species (City 2018). The project site is outside the MHPA. The MHPA is further discussed in Section 3.1.3, *City of San Diego*.

The ESL regulations further require that impacts to sensitive biological resources must be assessed and mitigation provided where necessary, as required by Section III of the City's Biology Guidelines.



City Biology Guidelines

The City's Biology Guidelines (2018) have been formulated by the Development Services Department to aid in the implementation and interpretation of the ESL Regulations; San Diego Land Development Code, Chapter 14, Division 1, Section 143.0101 et seq; and the Open Space Residential (OR-1-2) Zone, Chapter 13, Division 2, Section 131.0201 et seq. Section III of the Biology Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impact and mitigation under CEQA. The Biology Guidelines are the baseline biological standards for processing permits issued pursuant to ESL Regulations.

4.0 SURVEY RESULTS

4.1 PHYSICAL CHARACTERISTICS

Elevation on site ranges from approximately 490 to 510 feet above mean sea level, sloping from northwest to southeast. Soils on site are mapped as Stockpen gravelly loam (0 to 2 percent and 2 to 5 percent slopes; Bowman 1973).

According to historic aerial imagery, the site consists of land that was in agricultural production as far back as 1953 and has been left fallow since some time in the 1990s (NETR 2021).

4.2 VEGETATION COMMUNITIES

The project site supports two upland vegetation communities and developed land as shown in Table 2, on Figure 3, and described below.

Table 2EXISTING VEGETATION COMMUNITIES ON SITE			
Vegetation CommunityArea (acres)			
Non-native grassland (Tier IIIB)	11.30		
Disturbed land (Tier IV)	26.31		
Developed	0.05		
TOTAL	37.66		

Non-Native Grassland

Non-native grassland comprises 11.30 acres of the site (Figure 3). Non-native grassland is recognized as a Tier IIIB upland habitat (common upland) by the City.





As stated in Section 2.2.1 of this report, vegetation mapping took into account the City's defined differentiation between non-native grassland and other disturbed areas per Attachment II.A.1 (i.e., Map Submissions and Methodology, Problem Mapping Areas, Non-Native Annual Grasslands vs. Other Disturbed Areas [Ruderal, Agricultural/Fallow] on page 98 of the City's 2018 Biology Guidelines). That is, the relative percent cover of herbaceous species was used to distinguish between the two, and non-native grassland on the project site was mapped where non-native grass species comprised a relative cover of 50 percent or more. The transect data for areas mapped as non-native grassland versus disturbed land is provided in Appendix E. Non-native grassland on site has a percent cover of non-native grasses ranging from 62 to 96 percent and is characterized by non-native grass species such as wild oat (*Avena fatua*), common ripgut grass (*Bromus diandrus*), and annual beardgrass (*Polypogon monspeliensis*).

Disturbed Land

Areas mapped as disturbed land on site include those that have been mechanically disturbed or where broad-leaved, non-native plant species such as black mustard (*Brassica nigra*), garland daisy (*Glebionus coronaria*), and cheeseweed (*Malva parviflora*) are prevalent. Historic aerial imagery going back to 1953 (NETR 2021; Appendix F) shows intensive agricultural uses on the site until the 1990s. Additionally, imagery from the 2000s shows that the site has been mostly left fallow but has been subject to scattered vehicular use, significant trash dumping, and mowing. Approximately 26.31 acres of the site were mapped as disturbed land (Figure 3), and 69 to 82 percent of the vegetative cover is comprised of broad-leaved, non-native species (Appendix E). Disturbed land is considered Tier IV (other upland) by the City.

Developed

Developed land is where permanent structures and/or pavement have been placed, which prevents the growth of vegetation. On site developed land occurs where Airway Road intersects with Cactus Road and also with Britannia Boulevard (Figure 3). Developed is a non-sensitive land cover type that is not assigned to a tier of sensitivity by the City.

4.3 PLANT SPECIES OBSERVED

Thirty-seven species of plants were observed on site, of which only six are native species. A list of these plant species is presented in Appendix A.

4.4 ANIMAL SPECIES OBSERVED OR DETECTED

Seventeen species of animals (1 invertebrate, 2 reptiles, 11 birds, and 3 mammals) were observed or detected during the site visits. A list of these animal species observed is presented in Appendix B.



4.5 SENSITIVE BIOLOGICAL RESOURCES

According to City Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City 2018), sensitive biological resources refers to upland and/or wetland areas that meet any one of the following criteria:

- (a) Lands that have been included in the City's MSCP Preserve (i.e., the MHPA);
- (b) Wetlands;
- (c) Lands outside the MHPA that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;

(d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the FESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;

- (e) Lands containing habitats with MSCP Narrow Endemic species as listed in the Biology Guidelines (City 2018); or
- (f) Lands containing habitats of MSCP Covered Species as listed in the Biology Guidelines (City 2018).

4.5.1 Sensitive Vegetation Communities

Additionally, sensitive vegetation communities are those considered rare within the region or sensitive by CDFW (Holland 1986) and/or the City. These communities, in any form (e.g., including disturbed or burned), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The site supports one sensitive vegetation community (an ESL): non-native grassland (Tier IIIB).

4.5.2 Sensitive Plant Species

Sensitive plant species are those that are considered federal, State, or CNPS rare, threatened, or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per City Municipal Code (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the FESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (b) A species is a Narrow Endemic as listed in the Biology Guidelines in the Land Development Manual (City 2018); and/or
- (c) A species is a Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2018).



A species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS 2021). California Rare Plant Rank 1 includes plants that are rare, threatened or endangered in California. California Rare Plant Rank 2 includes plants that are rare, threatened or endangered in California but more common elsewhere. California Rare Plant Rank 3 includes plants that are eligible for State listing as rare, threatened or endangered. California Rare Plant Rank 4 plants are locally significant but few, if any, are eligible for State listing.

Sensitive plant status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread but exists naturally in small populations. No sensitive plant species were observed on site.

Sensitive plant species that were not observed but may have potential to occur on site (based on, for example, CNDDB records within the vicinity of the site, vegetation communities present, and soils present) are listed in Table 3. With the previous, long-standing, agricultural practices and disturbance of the site, it is unlikely that these species are present.

Table 4 lists MSCP Narrow Endemic species and their potential to occur on site. Narrow Endemic species are a subset of MSCP Covered Species (defined in Section 3.1.3, *City of San Diego, Multiple Species Conservation Program*). The City specifies additional conservation measures in its MSCP Subarea Plan to ensure impacts to Narrow Endemic species are avoided to the maximum extent practicable.





Table 3 SENSITIVE PLANT SPECIES NOT OBSERVED AND THEIR POTENTIAL TO OCCUR					
SPECIES SENSITIVITY ¹ POTENTIAL TO OCCUR					
Tecate tarplant (Deinandra floribunda)	CNPS RPR 1B.2	Low, due to previous agricultural activities and mechanical disturbance. Its habitats (i.e., chaparral and coastal scrub) are not present.			
San Diego barrel cactus (Ferocactus viridescens)	CNPS RPR 2B.1 MSCP Covered	Low, due to previous agricultural activities and mechanical disturbance. This species is a perennial stem succulent that would have been observed if present.			
Laguna Mountains jewelflower (Streptanthus bernardinus)	CNPS RPR 4.3	Not expected because the site is too low in elevation for this species (which occurs at elevations of 2,200 to 8,205 feet above mean sea level).			
Parry's tetracoccus (<i>Tetracoccus dioicus</i>)	CNPS RPR 1B.2 MSCP Covered	Low, due to previous agricultural activities and mechanical disturbance. Its habitats (i.e., chaparral and coastal scrub) are not present.			

CNPS RPR = California Native Plant Society Rare Plant Rank

1B.2 = Rare, threatened, or endangered in California and elsewhere. Moderately endangered in California (20 to 80 percent occurrences threatened/moderate degree and immediacy of threat).

2B.1 = Rare, threatened, or endangered in California but more common elsewhere. Seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat).

4.3 = Uncommon in California. Plants of limited distribution, a watch list. Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

MSCP Covered = Species for which the City has take authorization from the USFWS and CDFW within the City's subarea.



Table 4 MSCP NARROW ENDEMIC PLANT SPECIES AND THEIR POTENTIAL TO OCCUR						
SPECIES SENSITIVITY ¹ POTENTIAL TO OCCUR						
San Diego thorn-mint (Acanthomintha ilicifolia)	FT/SE CNPS RPR 1B.1	Low, due to previous agricultural activities and mechanical disturbance. There are no CNDDB or USFWS records for this species within the site vicinity.				
Shaw's agave (<i>Agave shawii</i>)	CNPS RPR 2B.1	Low, due to previous agricultural activities and mechanical disturbance. There are no CNDDB records for this species within the site vicinity.				
San Diego ambrosia (Ambrosia pumila)	FE CNPS RPR 1B.1	Low, due to previous agricultural activities and mechanical disturbance. There are no CNDDB or USFWS records for this species within the site vicinity.				
Aphanisma (Aphanisma blitoides)	CNPS RPR 1B.2	Not expected. No known populations in MSCP area.				
Coastal dunes milk vetch (Astragalus tener var. titi)	FE/SE CNPS RPR 1B.1	Not expected. Occurs in sandy places along the coast, including coastal dunes. There are no CNDDB records for this species within the site vicinity.				
Encinitas baccharis (Baccharis vanessae)	FT/SE CNPS RPR 1B.1	Not expected. Not known from near the site. Ther are no CNDDB records for this species within the site vicinity.				
Otay tarplant (<i>Deinandra conjugens</i>)	IantFT/SELow due to previous agricultural activit mechanical disturbance. This species w observed during sites visits in June and were within or near its blooming period no CNDDB or USFWS records for this within the site vicinity					
Short-leaved dudleya (Dudleya brevifolia)	SE CNPS RPR 1B.1	Not expected. Occurs on dry, sandstone bluffs in chamise chaparral. There are no CNDDB or records for this species within the site vicinity.				
Variegated dudleya (Dudleya variegata)	CNPS RPR 1B.2	Low, due to previous agricultural activities and mechanical disturbance. There are no CNDDB records for this species within the site vicinity.				
San Diego button-celery (Eryngium aristulatum var. parishii)	FE/SE CNPS RPR 1B.1	Not expected. Its vernal pool habitat is not present. There are no CNDDB or USFWS records for this species within the site vicinity.				
Spreading navarretia (Navarretia fossalis)	FT CNPS RPR 1B.1	Not expected. Its vernal pool habitat is not present. There are no CNDDB or USFWS records for this species within the site vicinity.				
Snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	CNPS RPR 1B.1	Low, due to previous agricultural activities and mechanical disturbance. There are no CNDDB records for this species within the site vicinity.				



Table 4 (continued)MSCP NARROW ENDEMIC PLANT SPECIESAND THEIR POTENTIAL TO OCCUR				
California Orcutt grass (Orcuttia californica)	FE/SE CNPS RPR 1B.1	Not expected. Its vernal pool habitat is not present. There are no CNDDB or USFWS records for this species within the site vicinity.		
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE/SE CNPS RPR 1B.1	Not expected. Site is outside the species' range.		
Otay Mesa mint (Pogogyne nudiuscula)	FE/SE CNPS RPR 1B.1	Not expected. Its vernal pool habitat is not present. There are no CNDDB or USFWS records for this species within the site vicinity.		

 ${}^{1}\text{FE} = \text{Federal-listed Endangered}$

FT = Federal-listed Threatened

SE = State-listed Endangered

CNPS RPR = California Native Plant Society Rare Plant Rank

1B.1 = Rare, threatened, or endangered in California and elsewhere. Seriously endangered in California

1B.2 = Rare, threatened, or endangered in California and elsewhere. Moderately endangered in California

2B.1 = Rare, threatened, or endangered in California but more common elsewhere. Seriously endangered in California

4.5.3 <u>Sensitive Animal Species</u>

Sensitive animal species are those that are considered federal- and/or State-listed threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per City Municipal Code (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as endangered or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the FESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (b) A species is a Narrow Endemic as listed in the Biology Guidelines in the Land Development Manual (City 2018); and/or
- (c) A species is a Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2018).

A species may also be considered sensitive if it is included on the CDFW Special Animals List (CDFW 2021) as a State Species of Special Concern, State Watch List species, State Fully Protected species, or Federal Bird of Conservation Concern.

Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss.

One sensitive animal species was observed.

Red diamond rattlesnake (*Crotalus ruber*)

Sensitivity: State Species of Special Concern

Distribution: Extreme southeastern Los Angeles County (Diamond Bar) into southern San Bernardino County, and south into southern Baja California, Mexico.

Habitat(s): Typically found in chaparral, coastal sage scrub, along creek banks, particularly among rock outcrops or piles of debris with a supply of burrowing rodents for prey.

Observations: One red-diamond rattlesnake was observed in non-native grassland in the northwestern portion of the site on June 13, 2021.

Sensitive animal species that were not observed or detected but that may have potential to occur (based on, for example, nearby CNDDB records in the site vicinity and/or the presence of potential habitat) are listed in Table 5. The BUOW, which is considered to have moderate potential to occur, was not found nor was evidence of BUOW use/occupation of the site found. Also, the species has not been historically reported to the CNDDB on site.

4.5.4 Waters of the U.S., Waters of the State, and City Wetlands

No Waters of the U.S. or Waters of the State were observed on site. Additionally, no City Wetlands were observed on site. City Wetlands are summarily characterized as have one or more of the following conditions: 1) contain naturally occurring wetland vegetation; 2) have hydric soils or wetland hydrology; and/or 3) are previous wetlands that were filled without a permit.

4.5.5 Wildlife Corridors

Wildlife corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species presence. Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or tributary drainages, to move between different habitat areas. Regional corridors provide these functions and link two or more large habitat areas. Regional corridors provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations.

The MHPA includes core biological resource areas and corridors targeted for conservation that preserve local and regional corridor functions. The site is not in the MHPA and is surrounded by existing development that severely limits, or even precludes, it from connecting any surrounding habitat areas. The site may provide some resources such as food for wildlife, but due to its history of agricultural and mechanical disturbance those resources are of low quality and limited.



Table 5 SENSITIVE ANIMAL SPECIES NOT OBSERVED OR DETECTED AND THEIR POTENTIAL TO OCCUR						
SPECIES SENSITIVITY ¹ POTENTIAL TO OCCUR						
	INVER	TEBRATES				
Quino checkerspot butterfly (Euphydryas editha quino)FELow. The parcel was determined to have minima potential for the species during the habitat assess Primary larval host plants dwarf plantain (Planta erecta) and owl's clover (Castilleja exserta) were observed. There are no CNDDB or USFWS reco the species in the site vicinity.						
	VERT	EBRATES				
Amphibian						
Western spadefoot (Spea hammondii)	SSC	Not expected. While it has been reported to the CNDDB in the site vicinity, it requires temporary pools for breeding, which do not occur on site.				
Reptile						
Baja California coachwhip (<i>Masticophis fuliginosus</i>)	SSC	Low. In California, found mainly in open areas such as grassland, shrubland, and coastal sand dunes. While the species has been reported to the CNDDB in the site vicinity, and some potential non-native grassland habitat is present, it is limited and of low quality.				
Birds						
Burrowing owl (<i>Athene cunicularia</i>)	BCC SSC MSCP Covered	Moderate. This species was not found nor was evidence of BUOW use/occupation of the site found during the focused survey for it in 2021. There is a CNDDB record for the species near the site, however, (i.e., approximately 0.1 mile southeast of the intersection of Otay Mesa Road and Cactus Road) from 2005, and the species is presumed extant in that location. Therefore, there is potential for the BUOW to occupy the project site prior to construction.				
Northern harrier (Circus hudsonius)	SSC MSCP Covered	Low. While some potential non-native grassland habitat is present, it is limited and of low quality. This species has not been reported to the CNDDB within one mile of the site.				
California horned lark (<i>Eremophila alpestris actia</i>)	WL	Low. While some potential non-native grassland habitat is present, it is limited and of low quality. This species has not been reported to the CNDDB within the site vicinity but has been reported within one mile.				

 1 FE = Federal-listed Endangered

BCC = Federal Bird of Conservation Concern: USFWS' highest conservation priorities and draw attention to species in need of conservation action.

SSC = State Species of Special Concern: Declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

WL = State Watch List: Birds that are/were: a) not on the current list of species of special concern but were on previous lists and have not been State listed under the California Endangered Species Act; b) previously State or federally listed and now are on neither list; or c) on the list of "Fully Protected" species.

MSCP Covered = Species for which the City has take authorization from the USFWS and CDFW within the City's subarea.



5.0 MSCP COMPLIANCE

5.1 <u>GENERAL PLANNING POLICIES AND DESIGN GUIDELINES</u>

Section 1.4.2 of the City's Subarea Plan includes General Planning Policies and Design Guidelines that have been applied in the review and approval of development projects within or adjacent to the MHPA. Since the project site is not within or adjacent to the MHPA, these policies and guidelines do not apply.

5.2 GENERAL MANAGEMENT DIRECTIVES

General management directives have been prescribed for all areas of the City's MSCP Subarea Plan, as appropriate. The one that applies to the project is listed below.

1. Mitigation shall be performed in accordance with ESL Regulations and the City's Biology Guidelines.

The mitigation measures in Section 7.0, *Mitigation Measures*, of this report have been formulated to satisfy the requirements of the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines.

Directives related to Restoration; Public Access, Trails, and Recreation; Adjacency Management Issues; Invasive Exotics Control and Removal; Litter/Trash and Materials Storage; and Flood Control are not applicable to the project as follows.

Restoration of habitat is not proposed as part of the project. The entire site would be developed.

The project is a logistics center with trailer office space and truck/trailer parking. There would be no trails or recreation opportunities on the site, which would be entirely developed. Therefore, there would be no public access for trails/recreation.

The project site is not adjacent to (or within) the MHPA; therefore, there would be no adjacency management issues.

The project would remove all vegetation from the site during construction (most of which is comprised of non-native species; Appendix A) and would not introduce invasive, exotic species into the MHPA because the project site is not within or adjacent to the MHPA.

The project would provide appropriate trash receptacles/bins and would receive municipal trash service. The property would be surrounded by 8-foot-high perimeter fencing that would prevent illegal dumping on the property. The property is not within or adjacent to the MHPA; therefore, any materials storage would not impact the MHPA.

There are no wildlife corridor undercrossings on the project site to be kept free of debris or obstructions.

There are no flood control channels on the project site for which standard maintenance would need to be performed.



6.0 PROJECT IMPACT ANALYSIS

The City's CEQA Significance Determination Thresholds (Appendix I to City 2018) are used to establish whether or not there is a significant effect defined as a "substantial or potentially substantial adverse change in the environment," which can be direct or indirect, cumulative, and permanent or temporary. The determination of significance for the project's impacts is presented beginning in Section 6.1 of this report.

6.1 **DIRECT IMPACTS**

Direct impacts immediately alter the affected biological resources such that those resources are eliminated temporarily or permanently. All direct project impacts would be permanent.

6.1.1 Direct Impacts to Vegetation Communities

The entire 36-acre site would be directly and permanently impacted by the project (Figure 3; Table 6). Impacts would be limited to non-native grassland and disturbed land.

Table 6 DIRECT IMPACTS TO VEGETATION COMMUNITIES				
Vegetation Community	Existing Area	Impacted Area		
Non-native grassland (Tier IIIB)	11.30	11.30		
Disturbed land (Tier IV)	26.31	26.31		
Developed	0.05	0.05		
TOTAL 37.66 37.66				

Analysis of Significance of Impacts to Vegetation Communities

According to the City's Biology Guidelines (City 2018), lands containing Tier IIIB habitats are considered sensitive and declining. Therefore, the project's impacts to 11.30 acres of Tier IIIB non-native grassland would be significant, and mitigation would be required.

According to the City's Biology Guidelines (City 2018), lands designated as Tier IV are not considered to have significant habitat value; therefore, the project's impacts to Tier IV disturbed land would not be considered significant, and no mitigation would be required. Impacts to developed land (no tier) also is not considered significant.

Table 7 shows the mitigation ratios applicable to the project per Table 3 of the Biology Guidelines.



Table 7 UPLAND MITIGATION RATIOS APPLICABLE TO THE PROJECT					
Tier	Habitat Type	Mitigation Ratios			
		Location of Preservation			
Tior IIIP ¹				Inside	Outside
(common uplands)	Non-native Grasslands ²	Location	Inside	1:1	1.5:1
uplands)		of Impact	Outside	0.5:1	1:1
		I	Location of	Preservatio	n
Tier IV (other uplands)				Inside	Outside
	Disturbed Land	Location	Inside	0:1	0:1
		of Impact	Outside	0:1	0:1

¹For impacts to Tier II, III A and III B habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

²Mitigation for impacts to occupied burrowing owl habitat (at the subarea plan specified ratio) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements.

6.1.2 Direct Impacts to Sensitive Plant Species

No sensitive plant species were observed on site. See Section 6.1.4 of this report for an analysis of impacts to sensitive plant species evaluated for their potential to occur on site.

6.1.3 Direct Impacts to Sensitive Animal Species

The red-diamond rattlesnake was observed in non-native grassland on site. The removal of nonnative grassland would result in a loss of habitat for this species. Additionally, potential injury or mortality could occur to the species during construction activity.

Analysis of Significance of Impacts to Sensitive Animal Species

This red-diamond rattlesnake is a State Species of Special Concern, which means that it is experiencing declining population levels, limited ranges, and/or continuing threats have made it vulnerable to extinction. Mitigation for loss of its habitat and potential injury or mortality would be required.



6.1.4 Direct Impacts to Sensitive Species with Potential to Occur

Tables 3 and 4 presented lists of the sensitive and MSCP Narrow Endemic plant species not observed and their potential to occur on site. These species are either not expected or have low potential to occur. Therefore, impacts to these species are not anticipated.

Table 5 presented a list of sensitive animal species not observed or detected and their potential to occur on site. All but one (i.e., BUOW) of these species is not expected to occur or has low potential to occur. Impacts to these species, therefore, are not anticipated.

The BUOW was not found during the focused survey for the species in 2021 nor was any evidence of BUOW use/occupation of the site found. However, there is moderate potential for the species to occupy the site prior to construction and be impacted. The impacts could involve injury or mortality to individuals from construction grading, earthmoving, burrow blockage, and heavy equipment compacting/crushing burrow tunnels.

Analysis of Significance of Impacts to Sensitive Species with Potential to Occur

Burrowing Owl

The BUOW (an MSCP Covered Species) is only considered adequately conserved as part of the MSCP if measures are taken to avoid impacts to the species. Therefore, should the site become occupied by the BUOW prior to construction, direct impacts to individual owls would be significant, and mitigation would be required.

6.1.5 <u>Wildlife Corridors</u>

The project site is largely surrounded by existing development, which severely limits, or even precludes, it from connecting off-site habitat areas. Therefore, the project would not significantly alter wildlife movement. No mitigation would be required.

6.2 **INDIRECT IMPACTS**

Indirect impacts consist of secondary effects of a project that can occur temporarily during construction or permanently from a project once built. Since the project site is surrounded by existing development, potential indirect impacts on sensitive biological resources (e.g., excessive noise or night-time lighting) would not occur.



6.3 CUMULATIVE IMPACTS

The MSCP was designed to compensate for the cumulative loss of biological resources throughout the San Diego region. Projects that conform to the MSCP as specified by the City's Subarea Plan and implementing ordinances, (i.e., Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through IV and MSCP Covered Species (City 2018). The project would comply with the City's Subarea Plan by mitigating for significant impacts in accordance with ESL Regulations and the City's Biology Guidelines.

Other projects in the City would also be required to comply with the City's Subarea Plan. Therefore, the project would not contribute considerably to cumulatively significant impacts on sensitive biological resources in the City.

7.0 MITIGATION PROGRAM

Section 7.1, *Mitigation Element*, of this report includes measures to mitigate significant direct impacts to non-native grassland and the red-diamond rattlesnake (and its habitat). Also, the project is required to comply with all applicable federal, State, and local regulations (see Section 3.1, *Regulatory Issues*, of this report) as well as the City's standard Mitigation Monitoring and Reporting Program Biological Resources Protection During Construction. Successful implementation of the mitigation measures, as well as compliance with applicable regulations and the City's standard measures, would reduce each impact to a less-than-significant level.

7.1 MITIGATION ELEMENT

The following mitigation measures have been formulated to satisfy the requirements of the City's MSCP Subarea Plan and Biology Guidelines.

7.1.1 Mitigation for Direct Impacts to Non-native Grassland

Mitigation Measures BIO-1 of the OMCPU Final Environmental Impact Report (FEIR; City 2013 revised 2014) states the following regarding mitigation for impacts to sensitive upland habitats:

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012a [revised in 2018]). These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.



Table 7 showed the habitats on site and the associated mitigation ratios. The project site is outside the MHPA. Impacts to non-native grassland outside the MHPA with mitigation inside the MHPA would require a mitigation ratio of 0.5:1. Impacts to non-native grassland outside the MHPA with mitigation outside the MHPA would require a mitigation ratio of 1:1. The mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Additionally, if the habitat is occupied by the BUOW, mitigation (at the subarea plan specified ratio) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements.

The BUOW, which is considered to have moderate potential to occur, was not found nor was evidence of BUOW use/occupation of the site found. Also, the species has not been historically reported to the CNDDB on site.

The applicant explored options for purchasing mitigation land; however, no land is available (see Appendix G). Therefore, the applicant proposes to use the City's Habitat Acquisition Fund (HAF) as its method of mitigation. The City's Biology Guidelines (City 2018) state, "In some cases, developments with small impacts may compensate by payment into a fund...intended to be used only for mitigation of impacts to small, isolated sites with lower long-term conservation value. For purposes of this fund, small is generally considered less than 5 acres, but could, in some cases, be considered up to 10 acres."

The project proposes to mitigate for impacts to 11.30 acres of non-native grassland through monetary compensation to the City's HAF at a 1:1 ratio requiring mitigation equal to 11.30 acres. The ratio is 1:1 because the City has indicated it cannot guarantee that mitigation land it purchases with the funds would be within the MHPA.

As explained in Section 4.1, *Physical Characteristics*, the site consists of land that was in agricultural production as far back as 1953 and has been fallow since some time in the 1990s and otherwise disturbed thereafter (NETR 2021; Appendix F). Only one sensitive animal species, red-diamond rattlesnake, has been observed, and it is not federal- or State-listed. The site is surrounded by development and is not located within or adjacent to the MHPA. The project site is, therefore, substantially isolated, and its long-term conservation value is low because of its past disturbance and lack of connection to a large area of habitat. Therefore, monetary compensation for the project's impacts to 11.30 acres of non-native grassland is appropriate because the impacts would occur on an isolated site with low long-term conservation value. Table 8 presents the mitigation proposal.



Table 8 PROPOSED MITIGATION					
Tier	Habitat	Impacted Acreage ³	Mitigation Ratio	Acreage of Mitigation Proposed	Proposed Mitigation Method
IIIB ¹	Non-native Grassland ²	11.30	1:14	11.30	Monetary compensation to the City's Habitat Acquisition Fund equal to 11.30 acres
IV	Disturbed Land	26.31	0:1	0.0	
TOTAL		36.0		11.30	11.30 acres

¹For impacts to Tier II, III A and III B habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

²Mitigation for impacts to occupied burrowing owl habitat (at the subarea plan specified ratio) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements. The BUOW, which is considered to have moderate potential to occur, was not found nor was evidence of BUOW use/occupation of the site found. Also, the species has not been historically reported to the CNDDB on site.

³The entire site is outside the MHPA; all impacts are on the project site.

⁴A ratio of 1:1 is proposed (rather than 0.5:1) because the City has indicated it cannot guarantee that mitigation land it purchases would be within the MHPA.

7.1.2 Mitigation for Direct Impacts to Sensitive Animal Species

The following presents the mitigation measures for potential impacts to the BUOW and reddiamond rattlesnake.

Burrowing Owl

Impacts to the BUOW, should it be present prior to construction, shall be mitigated, as follows consistent with Mitigation Measure BIO-1 of the OMCPU FEIR (City 2013 revised 2014) that states:

If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (preconstruction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts.



PRECONSTRUCTION SURVEY ELEMENT

Prior to Permit or Notice to Proceed Issuance:

- As this project has been determined to be BUOW occupied or to have BUOW occupation potential, the Applicant Department or Permit Holder shall submit evidence to the ADD of Entitlements and Multiple Species Conservation Program (MSCP) staff verifying that a Biologist possessing qualifications pursuant "Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Game. March 7, 2012 (hereafter referred as CDFG 2012, Staff Report), has been retained to implement a BUOW construction impact avoidance program.
- 2. The qualified BUOW biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City's BUOW requirements and subsequent survey schedule.

Prior to Start of Construction:

- 1. The Applicant Department or Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the project site; regardless of the time of the year. "Site" means the project site and the area within a radius of 450 feet of the project site. The report shall be submitted and approved by the Wildlife Agencies and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and BUOW locations on aerial photos.
- 2. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report -Appendix D
- 3. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of preconstruction/take avoidance surveys. Verification shall be provided to the City's Mitigation Monitoring and Coordination (MMC) and MSCP Sections. If results of the preconstruction surveys have changed and BUOW are present in areas not previously identified, immediate notification to the City and WA's shall be provided prior to ground disturbing activities.

During Construction:

1. **Best Management Practices shall be employed** as BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are BUOW occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.


- 2. On-going BUOW Detection If BUOWs or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "B" shall be followed. NEITHER THE MSCP SUBAREA PLAN NOR THIS MITIGATION SECTION ALLOWS FOR ANY BUOWs TO BE INJURED OR KILLED OUTSIDE OR WITHIN THE MHPA; in addition, IMPACTS TO BUOWs WITHIN THE MHPA MUST BE AVOIDED.
 - A. Post Survey Follow Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are <u>Not</u> Detected During the Initial Pre-Construction Survey -Monitoring the site for new burrows is required using CDFW Staff Report 2012 Appendix D methods for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete (*NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule).*
 - 1) If no active burrows are found but BUOWs are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.
 - 2) If no active burrows are found but BUOWs are observed during follow up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's MMC and MSCP Sections shall be notified and any portion of the site where owls have been sites and that has not been graded or otherwise disturbed shall be avoided until further notice.
 - 3) If a BUOW begins using a burrow on the site at any time after the initial preconstruction survey, procedures described in Section B must be followed.
 - 4) Any actions other than these require the approval of the City and the Wildlife Agencies.
 - **B.** Post Survey Follow Up if Burrowing Owls and/or Active Natural or Artificial Burrows are detected during the Initial Pre-Construction Survey - Monitoring the site for new burrows is required using Appendix D CDFG 2012, Staff Report for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete (*NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol).*
 - This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – all direct and indirect impacts to BUOWs within the MHPA <u>SHALL</u> be avoided.
 - 2) If one or more BUOWs are using any burrows (including pipes, culverts, debris piles *etc.*) on or within 300 feet of the proposed construction area, the City's MMC and MSCP Sections shall be contacted. The City's MSCP and MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist appropriate City biologist for on-going coordination with the Wildlife Agencies and the qualified consulting BUOW biologist. No construction shall occur within 300



feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.

- a) **Outside the Breeding Season** If the BUOW is using a burrow on site outside the breeding season (i.e., September 1 – January 31), the BUOW may be evicted after the qualified BUOW biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
- b) During Breeding Season If a BUOW is using a burrow on-site during the breeding season (Feb 1-Aug 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the BUOWs can be evicted. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
- **3. Survey Reporting During Construction -** Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's MMC, and MSCP Sections and the Wildlife Agencies and must be provided in writing (as by e-mail) and acknowledged to have been received by the required Agencies and DSD Staff member(s).

Post Construction:

1. Details of the all surveys and actions undertaken on-site with respect to BUOWs (i.e. occupation, eviction, locations etc.) shall be reported to the City's MMC Section and the Wildlife Agencies within 21 days post-construction and prior to the release of any grading bonds. This report must include summaries off all previous reports for the site; and maps of the project site and BUOW locations on aerial photos.

Red-diamond Rattlesnake

Potential impacts to the red-diamond rattlesnake shall be mitigated through implementation of the mitigation for impacts to non-native grassland presented in Section 7.1.1 of this report. This will secure comparable habitat for the species, and at the ratio required, per the City's Biology Guidelines.





7.2 PROTECTION AND NOTICE ELEMENT

The Protection and Notice Element of the Mitigation Program must provide assurances that areas offered for mitigation will be adequately protected from future development. Adequate notice must be recorded against the title of the mitigation property to memorialize the status of mitigation. The Protection Element identifies the specific actions to protect any areas offered as mitigation. These actions include dedicating the land in fee title to the City or recording a Covenant of Easement to the City, with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife named as third-party beneficiaries, against the title of the property.

Since the applicant is proposing to provide mitigation through monetary compensation into the City's HAF, and the City would use those funds to purchase mitigation lands, which it would then own, the City would provide assurance that the mitigation land would be adequately protected from future development.

7.3 MANAGEMENT ELEMENT

Long-term management of habitat acquired with HAF monies would be the responsibility of the City.



8.0 REFERENCES

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- U.S. Fish and Wildlife Service. 2014. Quino Checkerspot Butterfly Survey Protocol. February 21.



9.0 PREPARER'S QUALIFICATIONS/CERTIFICATIONS

Greg Mason, Principal/Senior Biologist, Alden Environmental, Inc.

Summary of Qualifications

Mr. Mason is the Principal and Senior Biologist at Alden Environmental, Inc. He has over 20 years' experience working in the environmental field and has participated in hundreds of projects in San Diego County. His experience includes oversight of large- and small-scale mitigation compliance programs, including habitat restoration, sensitive species surveys, vegetation mapping, wetland delineations, construction monitoring, impact analysis, report preparation, project permitting, and project management. He has worked extensively with both public and private clients, in coordination with federal, state and local regulatory staff, in the implementation of mitigation and monitoring programs in the field. He assists clients in obtaining aquatic resources permits including U.S. Army Corps Section 404 Permits, RWQCB Section 401 Certifications, and CDFW 1600 Streambed Alteration Agreements. Through his permitting work, Mr. Mason also facilitates the Section 7 consultation process with the USFWS and negotiates conservation measures. Mr. Mason is permitted by the USFWS to conduct presence/absence surveys for Quino checkerspot butterfly; San Diego, Riverside, vernal pool, Conservancy, and longhorn fairy shrimps; and vernal pool tadpole shrimp throughout the range of each species, and is also authorized to conduct dry season fairy shrimp analysis, identification, and culturing.

Professional Experience

Jr. Environmental Planner	HELIX Environmental Planning,	
	Inc., La Mesa, CA	1992 - 1993
Peace Corps Volunteer	U.S. Peace Corps, Paraguay	1993 - 1996
Environmental Planner	Helix Environmental Planning,	1996 - 1998
	Inc., La Mesa, CA	
Biologist	Helix Environmental Planning,	1998 - 2001
	Inc., La Mesa, CA	
Biology Group Manager	Helix Environmental Planning,	2001 - 2004
	Inc., La Mesa, CA	
Division Manager, Biological	Helix Environmental Planning,	2004 - 2008
Services	Inc., La Mesa, CA	
Vice President, Biological Services	Helix Environmental Planning,	2008 - 2011
	Inc., La Mesa, CA	
Principal and Senior Biologist	Alden Environmental, Inc., San	2011 - Present
	Diego, CA	

Education

Bachelor of Science, Natural Resources Planning & Interpretation, Humboldt State University, 1992

Registrations/Certifications/Licenses

- USFWS Threatened/ Endangered Wildlife Species Permit (quino checkerspot butterfly; San Diego, Riverside, vernal pool, Conservancy, and longhorn fairy shrimps; and vernal pool tadpole shrimp)
- USFWS authorized for dry season fairy shrimp analysis, identification, and culturing
- CDFW Scientific Collecting Permit SC-007619
- County of San Diego, Approved Biological Consultant and Approved Revegetation Planner

Professional Affiliations

- California Native Plant Society
- Returned Peace Corps Volunteer Association





FAMILY	SCIENTIFIC NAME	COMMON NAME	HABITAT ¹
ANGIOSPERMS	- MONOCOTS		
Aizoaceae	Mesembryanthemum crystallinum ²	crystalline iceplant	DH
Arecaceae	Washingtonia robusta ²	Mexican fan palm	DH
Poaceae	Avena fatua ²	wild oat	NNG, DH
	Bromus diandrus ²	common ripgut grass	NNG, DH
	Bromus madritensis ssp. rubens ²	foxtail chess	NNG
	Hordeum murinum ²	barley	NNG
	Lolium multiflorum ²	Italian ryegrass	NNG
	Polypogon monspeliensis ²	annual beard grass	NNG, DH
ANGIOSPERMS -	DICOTS		,
Apiaceae	Foeniculum vulgare ²	fennel	DH
	Ambrosia psilostachya	western ragweed	NNG
	Baccharis salicifolia	mule fat	DH
	Baccharis sarothroides	broom baccharis	DH, NNG
	Centaurea melitensis ²	star thistle	NNG, DH
	Deinandra fasciculata	fascicled tarplant	NNG
A <i>L</i>	Dittrichia graveolens ²	stinkwort	DH
Asteraceae	Glebionis coronaria ²	garland daisy	DH
	Helminthotheca echioides ²	bristly ox-tongue	DH
	Hedypnois cretica ²	Crete hedypnois	DH
	Hypochaeris glabra ²	smooth cat's-ear	DH
	Lactuca serriola ²	prickly-lettuce	DH
	Matricaria discoidea ²	pineapple weed	DH
Boraginaceae	Aminckia intermedia	rancher's fiddleneck	NNG
Brassicaceae	Brassica nigra ²	black mustard	NNG, DH
	Hirschfeldia incana ²	perennial mustard	NNG
Chenopodiaceae	Atriplex semibaccata ²	Australian saltbush	DH
	Amaranthus blitoides ²	prostrate amaranth	DH
	Salsola tragus ²	Russian thistle	DH
Fabaceae	Melilotus indica ²	Indian sweet clover	NNG, DH
Geraniaceae	<i>Erodium</i> sp. ²	filaree	DH
Lamiaceae	Marrubium vulgare ²	horehound	DH
Malvaceae	Malva parviflora ²	cheeseweed	DH
Polygonaceae	Rumex crispus ²	curly dock	NNG
Primulaceae	Lysimachia arvensis ²	scarlet pimpernel	DH
Solanaceae	Nicotiana glauca ²	tree tobacco	NNG, DH
	Solanum parishii	Parish's nightshade	NNG
Tamaricaceae	Tamarix parviflora ²	small-flowered tamarisk	DH
Urticaceae	$Urtica \ urens^2$	dwarf nettle	DH

¹Habitat acronyms: DH=disturbed habitat, NNG=non-native grassland ²Non-native species

Appendix B ANIMAL SPECIES OBSERVED – BRITANNIA AIRWAY LOGISTICS CENTER PROJECT		
SCIENTIFIC NAME	COMMON NAME	
INVERTEBRATES		
Superfamily Grylloidea	cricket	
VERTEBRATES		
Reptiles		
Crotalus ruber	red-diamond rattlesnake ¹	
Sceloporus occidentalis	western fence lizard	
Birds		
Buteo jamaicensis	red-tailed hawk (fly over)	
Calypte anna	Anna's hummingbird	
Carpodacus mexicanus	house finch	
Columba livia	rock pigeon	
Corvus brachyrhynchos	American crow	
Melospiza melodia	song sparrow	
Mimus polyglottus	northern mockingbird	
Streptopelia decaocto	Eurasian collared dove	
Sturnella neglecta	western meadowlark	
Euphagus cyanocephalus	Brewer's blackbird	
Zenaida macroura	mourning dove	
<u>Mammals</u>		
Canis latrans	coyote (scat)	
Otospermophilus beecheyi	California ground squirrel	
Sylvilagus audubonii	desert cottontail	

¹Sensitive species

Г

Appendix C

REPRESENTATIVE PHOTOGRAPHS

Representative Photographs July 10, 2021



Photo Point 1. 07/10/21



Photo Point 2. 07/10/21



Photo Point 3. 07/10/21



Photo Point 4. 06/13/21



Photo Point 5. 06/13/21



Photo Point 6. 06/13/21



Photo Point 7. 07/10/21



Photo Point 8. 07/10/21



Photo Point 9. 07/10/21



Photo Point 10. 07/10/21



Photo Point 11. 07/10/21



Photo Point 12. 07/10/21



Photo Point 13. 07/10/21



Photo Point 14. 07/10/21



Photo Point 15. 07/10/21



Photo Point 16. 07/10/21



Photo Point 17. 07/10/21



Photo Point 18. 07/10/21



Photo Point 19. 07/10/21



Photo Point 20. 07/10/21



Photo Point 21. 06/13/21



Photo Point 22. 06/13/21



Photo Point 23. 06/13/21



Photo Point 24. 06/13/21



Photo Point 25. 06/13/21



Photo Point 26. 06/13/21



Photo Point 27. 06/13/21



Photo Point 28. 06/13/21



Photo Point 29. 06/13/21



Photo Point 30. 06/13/21



Photo Point 1. 12/8/21



Photo Point 2. 12/8/21



Photo Point 3. 12/8/21



Photo Point 4. 12/8/21



Photo Point 5. 12/8/21



Photo Point 6. 12/8/21



Photo Point 11. 12/8/21



Photo Point 12. 12/8/21



Photo Point 13. 12/8/21



Photo Point 14. 12/8/21



Photo Point 15. 12/8/21



Photo Point 16. 12/8/21



Photo Point 17. 12/8/21



Photo Point 18. 12/8/21



Photo Point 19. 12/8/21



Photo Point 20. 12/8/21


Photo Point 21. 12/8/21



Photo Point 22. 12/8/21



Photo Point 23. 12/8/21



Photo Point 24. 12/8/21



Photo Point 25. 12/8/21



Photo Point 26. 12/8/21



Photo Point 27. 12/8/21



Photo Point 28. 12/8/21



Photo Point 29. 12/8/21



Photo Point 30. 12/8/21

Appendix D

BURROWING OWL SURVEY REPORT



3245 University Ave, #1188 | San Diego, CA 92104 | Phone/Fax: 619.284.3815

July 20, 2020

Mr. Ben Badiee Badiee Development 1261 Prospect St. Ste 9 La Jolla, CA 92037

Subject: Burrowing Owl Survey Report for the Britannia Airway Logistics Center Project Site

Dear Mr. Badiee,

This letter presents the results of the 2021 nesting season survey for the burrowing owl (*Athene cunicularia*) conducted on the approximately 40-acre Britannia Airway Logistics Center Project Site.

LOCATION AND SITE DESCRIPTION

The site consists of an undeveloped parcel located East of Cactus Road, west of Britannia Boulevard, and south of Airway Road in the City of San Diego (City) (Figures 1 and 2). The site is not located within or adjacent to the City MSCP's Multi-habitat Planning Area (MHPA) or Vernal Pool Habitat Conservation Plan (VP HCP) areas, and it is outside the coastal zone.

METHODS

Biologist Greg Mason conducted the BUOW survey. The 2021 survey consisted of 4 site visits on separate days (Table 1, Appendix A) according to the survey methods in the Staff Report on Burrowing Owl Mitigation (CDFG 2012). Representative photographs were taken and are enclosed as Appendix B.

Burrowing owl habitat was examined by walking line transects spaced approximately 10m apart across the site (Figure 3). At the start of each transect and at approximately every 100m the entire visible project area was scanned for burrowing owls using binoculars. The entire site was surveyed for burrowing owls and potential burrows or perches that could be used by the owl. Burrowing owls are known to occupy California ground squirrel (*Spermophilus beecheyi*) burrows; therefore, particular attention was paid to any areas along fence lines, or other locations where squirrel activity has been observed in the past, was observed presently, or was likely to occur. The determination of owl presence was made by direct owl observation or by owl signs such as, but not necessarily limited to, excavated soil, whitewash (excrement), castings (pellets), and/or feathers.

Table 1Burrowing Owl Survey Information					
Survey Number	Date	Biologist	Time	Weather Conditions (start/stop)	
1	2/22/2021	Greg Mason	0600-0910	Overcast, 62°F, wind 0-1 mph/ Partly cloudy, 65°F, wind 0 mph	
2	4/17/2021	Greg Mason	0620-0925	Partly cloudy, 55°F, wind 0-1 mph/ Partly cloudy, 59°F, wind 0-1 mph/	
3	6/13/21	Greg Mason	0616-0915	Overcast, 61°F, wind 0 mph/ Overcast, 64°F, wind 0-1 mph	
4	7/10/2021	Greg Mason	1740-2030	Clear, 70°F, wind 0-5 mph/ Clear, 65°F, wind 0-5mph	

SURVEY RESULTS

No BUOW or potential BUOW sign/evidence was observed on the site during any of the visits. Several ground squirrel burrows were observed in earthen berms and debris piles along the site's boundaries, but they did not exhibit any evidence of BUOW occupation. No BUOW or potential BUOW sign/evidence was observed on the site during any of the visits. Based on the negative results of the 2021 field surveys, the site is not anticipated to be occupied (active burrows) by the BUOW.

Please contact me if you have any questions.

Sincerely,



Greg Mason Senior Biologist

Enclosures:

Regional Location Map
Project Location Map
BUOW Survey Map
Field Notes
Representative Photos

References:

- Bowman, R. 1973. Soil Survey of the San Diego Area. USDA in cooperation with USDI, UC Agricultural Experiment Station, Bureau of Indian Affairs, Department of the Navy, and the U.S. Marine Corps.
- California Department of Fish and Game (CDFG). 2012. Staff Report on Burrowing Owl Mitigation. March 17.







Appendix A

Field Notes

BAD-03 Chang 2/22/21 BVOW #1 Start 62°F, 0-1, 0rest End 65, 10 M/H, patty Rids Other Mono Gotherts, Cow Cotto Seat Nomo Cottents. Nomo Cottents. Momo Cottents. Momo Cottents. Momo Cottents. Momo Cottents. Momo Cottents. Momo Cottents. All scint I burras scatted for BVOX Sigh - Now found - Stars filts also checked. Burras GM Rete in the Rain

BAD-63 BUOW # 2 4/17/21 611 51/27 0670, 55°F, 0-1 MPH, p.T.1. End 0925, 51°F, 0-1 MPH, p.T.1. End 0925, 51°F, 0-1 MPH, p. 117 Ride other Male G-savinr! Anna's Compan blactibid co tott - sont Ve Me Rec ti pigran NO BUON or evidence NO BUON or Evidence af Buon compation Rite in the Rain

BAD-03 BUON 6/13/21 Stat 06/6 Overast, AMPH, 61°F End 09/5 averast, 0-1M/L, 64° SM Bilds 6 - Squine 1 - Henns NoNo cottante, 1 5 spanna ND refference MLart HFING RT Hanh (Flyeros Crow Crow Common Marthurd No coidence of Budw or crafting in squint Durrans in perimeter benus Rite in the Rain-

3AD-03#4 Bron 6 7/10/21 5tat 1740 (10, 7007, 0-5 MHT Fud 2030, Clay, 65F, 0-5 Gm Annas Catleyte! capte Sigt NoNo WeMe W-Fener Liz Crictle ts Mala Crow Sas/ Hofi Compar blackbuld Final BUOW Surrey, no BUOW or evidence of BUON personer. -Also scarched for Otay taplant, wegetive results

Appendix B

Representative Photos

Representative Photographs



Photo Point 1. 07/10/21



Photo Point 2. 07/10/21



Photo Point 3. 07/10/21



Photo Point 4. 06/13/21



Photo Point 5. 06/13/21



Photo Point 6. 06/13/21



Photo Point 7. 07/10/21



Photo Point 8. 07/10/21



Photo Point 9. 07/10/21



Photo Point 10. 07/10/21



Photo Point 11. 07/10/21



Photo Point 12. 07/10/21



Photo Point 13. 07/10/21



Photo Point 14. 07/10/21



Photo Point 15. 07/10/21



Photo Point 16. 07/10/21



Photo Point 17. 07/10/21



Photo Point 18. 07/10/21



Photo Point 19. 07/10/21



Photo Point 20. 07/10/21


Photo Point 21. 06/13/21



Photo Point 22. 06/13/21



Photo Point 23. 06/13/21



Photo Point 24. 06/13/21



Photo Point 25. 06/13/21



Photo Point 26. 06/13/21



Photo Point 27. 06/13/21



Photo Point 28. 06/13/21



Photo Point 29. 06/13/21



Photo Point 30. 06/13/21

Appendix E

TRANSECT DATA



Transect	Poaceae Relative Cover	Non- Poaceae Relative Cover
1	83	17
2	62	38
3	28	72
4	31	69
5	73	27
6	22	78
7	87	13
8	25	75
9	18	82
10	27	73
11	89	11
12	96	4
13	21	79
14	19	81
15	25	75







2なな! Date: Surveyor:

Species Point Herb Laver Shrub Laver Tree Layer ta 1 26 27 \checkmark 28 9 29 5-0 30 fet. 12 31 Art 11 32 14 33 S 34 35 36 37 38 39 40 RAN's 41 Arry 42 43 44 -s Pe 45 46 15 47 9 Tra e t 48 49 50 ¥ Statis Total Cover: 100 Relative Ruderal Cover % Relative Poaceae Cover % 441.45 th capebis, 17% \$3 %

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Gi. Shrubia ter

N/ Dait

Area: $747-3$ Transect #: 2 of 15 Page #: 0 of 2		Date: 2/21/21 Surveyor:G
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5 6		
7 8		
9 10		
11 12		
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18 19		
20 21		
22 Arther for 23 Actes		
24 25		

Area:			
Transect #:	2	of	
Page #:	2	of	2

	20 Balling	
Date:	HE M	
Surveyor:	CM	
	- 0	

		Species	
<u>Point</u>	Herb Layer	Shrub Layer	Tree Layer
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Total Cover: 06% ABAN 77

Relative Poaceae Cover %

461.45 F =7.17

(No bait) 6290 JNNG

Relative Ruderal Cover %

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Date: 2/21/21 Surveyor: 6m

Point		Species	
	Herb Layer	Shrub Layer	<u>Tree Layer</u>
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21 -			
22			
23			
24			
25	10 11-11		

Area:			
Transect #:	3	of	
Page #:	2	of	2

	6121/21
Date:	21 - 1 - F
Surveyor:	Gu

		Species	
Point	Herb Layer	Shrub Layer	Tree Layer
26	(+ M+ -		
27			
28	\sim		
29	Hel Ech		
30	Gle Cor		
31			
32			
33	Adopat Profis		
34			
35	V		
36	At Sen		
37			
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40		<u></u>	
41			
42	Fa Braks		
43			
44	Maller		
45			
46	Hollmy Grad		
47	Hey Mur		
48	×		
49	rie Nig		
50	V		

Total Cover: 200 1000

Relative Poaceae Cover % 19145 01-FE7

2870

Relative Ruderal Cover %

+1 at of 5-1270



Area:		Date: <u>2/2/2/</u>
Transect #: 4 of Page #: 2 of 2	~	Surveyor:
V	Species	
Point Herb Layer	Shrub Layer	Tree Layer
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27 Atrachen		
28		
29 Selfre		
30 No Phi		
31		
32 Are Arc Per		
33		
34		
35 🗸 🗸		
36 Ant Brackis		
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Total Cover: 22 - No Dane Aus 62 hits W face Pr

Relative Poaceae Cover %

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NNG

Relative Ruderal Cover %

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Point	Herb Layer	<u>Species</u> Shrub Layer	Tree Layer
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24	Ballig/ Brows		
25		· <u>······</u>	

Area: AD - c7Transect #: <u>6</u> of <u>15</u> Page #: <u>6</u> of <u>2</u>

2

Area: Transect #: <u>6</u> of Page #: <u>7</u> of <u>7</u>

Date: 2/21/21 Surveyor: <u>Gan</u>

Point		Species	
<u>i ont</u>	Herb Layer	Shrub Layer	Tree Layer
26	Franking Brawing		
27			
28			
29	Ma Pax		
30			
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32	"rullig		
33			
34	~		
35	Bie Nig Bours		
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39	SalTra		
40	Ballia		
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46	Brullin Horize		
47	2.1°		
48	Birlig		
49			
50	X		

Total Cover: 1009, No Deir

Relative Poaceae Cover % $| \mathcal{U}_h | \mathcal{U}_s = \mathcal{U}_s + \mathcal$

Relative Ruderal Cover %

7872

1270

Date: 2/21/21 Surveyor: <u>CM</u>

Point		Species	
	Herb Layer	Shrub Layer	Tree Layer
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Area: $\overrightarrow{VA} \xrightarrow{1-6}$ of $\overrightarrow{1}$ Page #: $\overrightarrow{1}$ of $\overrightarrow{2}$

Area:			
Transect #:	7	of	
Page #:	2	of	2

Date: 2/21/21 Surveyor: 6m

Total Cover: No Bar ARS 1. 57 52

Relative Poaceae Cover % 46 hils at ef 53



Relative Ruderal Cover %

7 his est of 53

350





Date: 2/21/21 Surveyor: 6m

		Species	
nt	Herb Laver	Shrub Layer	Tree Layer
6	Bralling Ave		/
7	Pre Nic		
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9			
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5	V		
5	Saltra		
7	V		
3	Brellin	· · · · · · · · · · · · · · · · · · ·	
)	×		
	Malley	(<u></u>	
	V		
	Aretai		
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5	N/		
	Bralling	1 · · · · · · · _ · · _ · = ~ ~ · · · · · · · ~	
3			
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Total Cover:NotionRelative Poaceae Cover %ABS H1156015 at at 60 h115

Relative Ruderal Cover % 45 art 60 4555

9590



Date: 2/21/21 Surveyor:



Area:





Date: 2/21/21 Surveyor: _____

		Species	
Point	Herb Layer	Shrub Layer	Tree Layer
26	VelV. S		
27			
28	Ý		
29	Sel Tre		
30			
31	Geler.		
32			
33	-		
34			
35			
36	Premis -		
37			
38			
39			
40	Bakin Bouri		
41			
42	-		
43			
44			
45	Brellig		
46			
47			
48	Grear		
49			
50			

Total Cover: 100% 110 Bart A351141 63

Relative Poaceae Cover %

2790

Relative Ruderal Cover % 401 Cover 7 50

732



Date: 2/21/21 Surveyor: _____

Point	Horb Lavor	<u>Species</u>	Troolover
1	Bea	Shiub Layer	TIEE Layer
1	(IICW)	· · · · · · · · · · · · · · · · · · ·	(
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16			
17			
18			
19			
20			
21			
22	V		
23	Brensy Heet		
24	Ruzin		
25]

	Area:		Date: 22121
	Transect #: <u> </u> of <u>/</u> Page #: <u>)</u> of <u>)</u>		Surveyor: 670
		Species	
Point	Herb Layer	Shrub Layer	Tree Laver
26	14100		
27			
28	V		
29	Tr. Waltan		
30			
31	V		
32	Artal		
33	4		
34	Freioul		
35			
36			
37	V		
38	Barris Salta		
39	Reep. 1		
40			
41			
42			
43			
44			
45	V		
46	Rame Melle-		
47	Tene		
48			
49			
50	X		
	Total Cover: W No Mago	Relative Poaceae Cover %	Relative Ruderal Cover %
4	r (Hins 56	50 catch 56 haits	blits all of So
/1		land and	9
		(970)	100
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		\checkmark	
		NNG	
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Date: 2/21/21 Surveyor: 6M

0		<u>Species</u>	
Point	Herb Layer	Shrub Layer	Tree Layer
26	Artes		
27			1 <u></u>
28	Ň.		
29	H+1619		
30	- Marka		
31	Baurul		
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48			·
49 50			
	rig No Barr		
	Total Cover:	Relative Poaceae Cover %	Relative Ruderal Cover %
	ABS HIS SI	49 h. 12 al el 21	2 hitsevier 1
		9190	49
		6.0	
		1/1/0	
		IV IV O	

Area: Transect #: 12 of 15Page #: 2 of 2


	ob i	1	
Area:	Are	1	
Transect #:	13	of	12
Page #:	2	of	2

Date: 2/21/21 Surveyor: _______

		Species	
Point	Herb Layer	Shrub Layer	Tree Laver
26	HedGh		
27	Maller		
28			<u>\</u>
29			
30	Mc Per Bron-S_		
31			4
32	Po Man Maller		
33	1 .		
34			
35	Atriem		
36			
37	6 + (4		
38			
39			
40			
41			
42	64/Palman		
43			
44			
45			
46	- Draftig		
47			
48			
49 50			
οu			
	119 NO 1614		

Total Cover: PC9. No Boir Counting dupler

Relative Poaceae Cover %

21%

Relative Ruderal Cover % 50 h of 67 7990





Date: 2/21/21______ Surveyor: _______

Species Point Tree Layer Shrub Layer Herb Laver Bralling 26 27 28 -29 30 A 31 32 87 Brown Nia 33 34 35 Brejon S (th) 36 37 38 Pin MAY 39 40 41 Bro Nig 42 43 44 45 (In My 46 Gle Cor 47 48 49 50 N Total Cover: 00% No Barr

A95 67 115

Relative Poaceae Cover % 12 hilts and of 62

970







Total Cover: 19690No Burn

Relative Poaceae Cover%

2570

Relative Ruderal Cover % FER Sontsa

> 75 20

4 6

Appendix F

HISTORICAL AERIAL IMAGERY

























Appendix G

MITIGATION LAND SEARCH



Results								Government property, unavailable for	acquisition.							
Owner	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO							
Acres	23.9	20.4	20.1	58.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3
APN	64504050	64504207	64505104	64506102	64507406	64507408	64507409	64507412	64507418	64507419	64507421	64507506	64507507	64507508	64507509	64507513
Map No.			1	1	1				-	1			-		- I	

Results								Government property, unavailable for	acquisition.							
Owner	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO							
Acres	1.3	1.3	55.4	55.8	97.1	23.3	32.0	35.1	23.2	28.6	37.3	26.5	72.6	25.6	29.3	55.7
APN	64507520	64507606	64508004	64508006	64508012	64509016	64511307	64523129	64524203	64524205	64528023	64529101	64538011	64605010	64605015	64605017
Map No.		1			1	1	1	- -	-	1		1	1		1	

Results				Government property, unavailable for	acquisition.					Government property, unavailable for acquisition.		Government property, unavailable for	acquisition.	Unavailable.	Unavailable. Currently pursuing development project.
Owner	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	CITY OF SAN DIEGO	STATE OF CALIFORNIA	STATE OF CALIFORNIA	STATE OF CALIFORNIA	UNITED STATES OF AMERICA	UNITED STATES OF AMERICA	BLUE MERCED R 1414 LLC	CANDLELIGHT PROPERTIES LLC			
Acres	22.5	23.4	57.2	27.2	1.6	21.4	7.1	44.1	55.8	22.3	35.9	96.5	35.9	26.0	7.1
APN	64605021	64605025	66704002	66704003	66704004	66704005	66704006	66705066	64509024	64603018	64607043	66704012	66704014	64504041	64506105
Map No.		<u>.</u>		-	(5	·	.,)	4	S

Map No.	APN	Acres	Owner	Results
9	64611019	28.1	CROWN ENTERPRISES INC	Unavailable. Also not within or adjacent to the MHPA.
7	66701021	10.1	DEXSTAR INC	Unavailable. In addition parcel is of insufficient size for proposed project needs and is not within or adjacent to the MHPA.
8	66701014	27.5	HANDLER TRUST 08-27-83	Unavailable. Currently pursuing development project.
6	64603026 64607038	56.4 87.2	KEARNY PCCP OTAY 311 LLC KEARNY PCCP OTAY 311 LLC	Lonestar EAST: Unavailable for purchase. Already components of other project mitigation.
10	64612135	46.7	LA MEDIA&AIRWAY LLC	Unavailable. Site heavily disturbed and undergoing activities.
11	64612134	24.3	LAS VEGAS SUNSET PROPERTIES	Unavailable. Currently pursuing development project.

Map No.	APN	Acres	Owner	Results
12	66706028	23.4	METROPOLITAN AIRPARK LLC	Unavailable. Component of other project mitigation
13	64611008	24.0	MILLER EUGENIA V 1985 TRUST	Unavailable. Also, insufficient NNG habitat to meet proposed project needs.
14	64603025	57.3	OTAY BUSINESS PARK LLC	Unavailable. Already component of other project mitigation.
15	66706010	69.7	OTAY FAR EAST LLC	Unavailable. Anticipating future mitigation and development project.
16	64505004	21.7	OTAY MESA CROSSING LLC	Unavailable. Already component of other project mitigation.
17	64611039	54.8	OTAY MESA DEVELOPMEMT	Unavailable. Currently processing a development project. Also, Unavailable. Also not within or adjacent to the MHPA.
18	64508003	222.0	OTAY MESA LLC	Unavailable. Currently anticipating future development project (Bachmann).
19	66706011	34.1	OTAY-T J NORTH LLC	Unavailable. Currently pursuing development project (CBX).
20	64610077	53.4	PAEZ JOSEPH JR	Unavailable. Future Bachmann project.

ap 0.	APN	Acres	Owner	Results
Γ	64506104	49.3	PARDEE HOMES	
-	64506106	14.3	PARDEE HOMES	
	64506107	14.3	PARDEE HOMES	
	64506108	14.4	PARDEE HOMES	
	64506109	14.4	PARDEE HOMES	Unavailable. Anticipating future development
	66701006	86.4	PARDEE HOMES	project and associated mitigation for project impacts.
	66701015	57.2	PARDEE HOMES	
	66701019	10.9	PARDEE HOMES	
	66701020	9.5	PARDEE HOMES	
_	66704013	230.8	PARDEE HOMES	
	64613055	21.0	SAN DIEGO DEVELOPMENT GROUP	Unavailable. Planning future project. Surrounded by development, not within or adjacent to the MHPA, insufficient NNG habitat for project needs.
	66701022	89.1	SAN YSIDRO 96 LLC	Insufficient NNG available for project needs.

Map No.	NdV	Acres	Owner	Results
	64506032	25.4	SOUTHVIEW LLC	
24	64506035	19.8	SOUTHVIEW LLC	 Unavailable. Currently pursuing development project (Southview and Southview East).
	64508008	18.1	SOUTHVIEW LLC	
25	64611011	26.9	ZOURA FAMILY TRUST 10-08-09	Unavailable. Owner unwilling to sell and potentially seeking development project.
	64507101	1.2	QUINATA SUSANA A LIVING TRUST	
	64507102	1.2	JABLONSKI SCOTT	
	64507103	1.2	ORTIZ MARY LIVING TRUST 05- 23-16	West Otay Mesa "1-acre Parcels." Multiple owners either unavailable to contact or unwilling
07	64507104	1.2	COASTAL CAPITAL GROUP LLC ET AL	to sell. Unrealistic to cobble together sufficient acreage to meet project needs.
	64507105	1.2	BAYVIEW LOAN SERVICING LLC	
	64507106	1.2	NEIL TIMOTHY Y	
	64507107	1.2	DELRIO RICARDO&NORMA	

Map No.	APN	Acres	Owner	Results
	64507108	1.2	SANDOVAL ROBERT F&AVALOS	
	64507109	1.2	SANDOVAL GUILLERMO F	
	64507110	1.2	VENZON FAMILY TRUST 11-20-99	
	64507111	1.2	SANDOVAL GUILLERMO F	
	64507112	1.2	ORTIZ MARY LIVING TRUST 05- 23-16	
	64507113	1.2	SAWAGED SAVANNAH H	Woot Otory Maco "1 area Dourale " Miritiala
26	64507114	1.2	WOLFGRAMM FAMILY TRUST 05-01-03	west Otay Mesa 1-acter rates. Multiple owners either unavailable to contact or unwilling to sell. Unrealistic to cobble together sufficient
	64507201	1.2	PREACHER RONDA R	acreage to meet project needs.
	64507202	1.2	GUZMAN-NEVAREZ MARCO A	
	64507203	1.2	LOMELI FAMILY TRUST 03-19-99	
	64507204	1.2	ORTIZ FAMILY TRUST 12-09-96	
	64507205	1.2	ORTIZ FAMILY TRUST 12-09-96	
	64507206	1.2	OROZCO JOSE M&MARTHA E	
	64507207	1.2	GARCIA FAMILY TRUST 09-17-01	

Map No.	APN	Acres	Owner CADCIA CADLOS D&ET 17 ADETH	Results
	64507/208	1.2	GARCIA CARLOS R&ELIZABETH	
	64507209	1.2	PHAM HUNG VAN&THUOC THI REVOCABLE 2006 TRUST 11-08- 06	
	64507210	1.2	VELEZ BARBARA A 2016 TRUST 04-07-16	
	64507211	1.2	WHEELER JOHN F&VIVIAN Revocable intervivos Trust 05-23-83	West Otay Mesa "1-acre Parcels." Multiple
26	64507212	1.2	RAMOON HOLDINGS LLC	owners either unavailable to contact or unwilling
	64507213	1.2	MORENO TRUST	acreage to meet project needs.
	64507214	1.2	PARDEE HOMES	
	64507301	1.2	AGUILAR MIGUEL <aka mejia<br="">MIGUEL></aka>	
	64507302	1.2	SALERNO RALPH N TRUST 04-26- 06	
	64507303	1.2	PARDEE HOMES	
	64507304	1.2	MERCADO PEDRO G&JOSEFINA C	

Map No.	NAP	Acres	Owner	Results
	64507305	1.2	PARDEE HOMES	
	64507306	1.2	PARDEE HOMES	
	64507307	1.2	ALGERT JAMES H LIVING TRUST 01-05-06	
	64507308	1.2	PARDEE HOMES	
	64507309	1.2	BEAVER ESSIE M	
	64507310	1.2	PARDEE HOMES	
76	64507311	1.2	PARDEE HOMES	west Otay Mesa "1-acre Parcels." Multiple owners either unavailable to contact or unwilling
07	64507312	1.2	SALERNO RALPH N TRUST 04-26- 06	to sell. Unrealistic to cobble together sufficient acreage to meet project needs.
	64507313	1.2	BURROLA ERNESTINA LIVING TRUST	
	64507314	1.2	ROMERO JUAN A&PILAR C	
	64507401	1.3	ROWE CELESTE M	
	64507402	1.3	FITZGERALD JOHN D&ELAINE M FAMILY TRUST	
	64507403	1.3	ALCARAZ TERESITA L TR	

Map No.	APN	Acres	Owner	Results
	64507404	1.3	PARDEE HOMES	
	64507405	1.3	PARDEE HOMES	
	64507407	1.3	VALDIVIA HILARIO G&MARIA G REVOCABLE 1997 TRUST 06-13- 97	
	64507410	1.3	VELEZ BARBARA A 2016 TRUST 04-07-16	
	64507411	1.3	GARCIA JOSE A&ROSA&GARCIA GUADALUPE D P	West Otay Mesa "1-acre Parcels." Multiple
26	64507413	1.3	SHIBUYA YOSHINDO&BETTY T TRUST 06-16-82	to sell. Unrealistic to cobble together sufficient acreage to meet project needs.
	64507414	1.3	NGUYEN THUAN D	
	64507415	1.3	SALAZAR SALVADOR E	
	64507416	1.3	LUNA ROBERTO A	
	64507417	1.3	SANCHEZ JOSE M	
	64507420	1.3	MANZANO FRANCISCO J A&DEAGUILAR ELENA C	
	64507422	1.3	PARDEE HOMES	

Map No.	APN 64507433	Acres	Owner DADAFE HOMFS	Results
	6450/423	1.3	PAKDEE HOMES	
	64507424	1.3	WINANS JOHN R TR	
	64507425	1.3	HUERTA CARMEN TRUST 06-14- 07	
	64507426	1.3	ARROYO FAMILY TRUST 10-06- 05	
	64507501	1.3	GANEM ALBERT F LIVING TRUST 01-07-92	
20	64507502	1.3	LOMELI FAMILY TRUST 02-22-07	West Otay Mesa "I-acre Parcels." Multiple owners either unavailable to contact or unwilling
07	64507503	1.3	PARDEE HOMES	to sell. Unrealistic to cobble together sufficient acreage to meet project needs
	64507504	1.3	PARDEE HOMES	
	64507505	1.3	PARDEE HOMES	
	64507510	1.3	CASTRO RAMON&ROSA 2017 TRUST 08-23-17	
	64507511	1.3	SHIBUYA YOSHINDO&BETTY T TRUST 06-16-82	
	64507512	1.3	PULIDO LIVING TRUST 12-12-06	
	64507514	1.3	ARELLANO BURGUENO CORP	
Map No.	NAA	Acres	Owner	Results
------------	----------	-------	-------------------------------------	--
	64507515	1.3	LIERAS MANUEL&MARY C	
	64507516	1.3	RODRIGUEZ FAMILY TRUST 10- 09-02	
	64507517	1.3	SALAZAR SALVADOR E	
	64507518	1.3	NDIBA SAMUEL&NGETHE TERISIA N	
	64507519	1.3	VALDIVIA LETICIA	
	64507521	1.3	PARDEE HOMES	West Otay Mesa "1-acre Parcels." Multiple
26	64507522	1.3	BRAMBILA GUILLERMO&ROSIE	to sell. Unrealistic to cobble together sufficient
	64507523	1.3	PARDEE HOMES	acreage to meet project needs.
	64507524	1.3	NELSON RICK V	
	64507525	1.3	GAMBOA MANUEL&SONIA	
	64507526	1.3	HUERTA M M TRUST 08-13-15	
	64507526	1.3	VILLAESCUSA TITO	
	64507601	1.3	FUZET MONIQUE TRUST 07-21-16	
	64507602	1.3	PARDEE HOMES	

gation Parcel Search	Results	West Otay Mesa "1-acre Parcels." Multiple owners either unavailable to contact or unwilling to sell. Unrealistic to cobble together sufficient acreage to meet project needs.													
City of San Diego/Otay Mesa NNG Miti	Owner	MUTSCHLER JOAN <aka HOLTEL MARY J></aka 	DODD CHARLES	BLAS ANTONIO&BEATRIZ	PARDEE HOMES	ALVAREZ JOSE	SAN YSIDRO LAND TRUST 07-19- 07	LOZANO RAYMOND S&MARTHA	NGUYEN NHATNAM	VELASQUEZ AMPARO S REVOCABLE TRUST 09-06-00	VELASQUEZ AMPARO S REVOCABLE TRUST 09-06-00	ALCARAZ TERESITA L TR	BENTON ANDREW W&MELISSA D	ORTIZ MARCELINO&TERESA	
	Acres	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	
	APN	64507603	64507604	64507605	64507607	64507608	64507609	64507610	64507611	64507612	64507613	64507614	64507615	64507616	
	Map No.		1	1	1	1	1	26	1	<u> </u>	1	1	<u> </u>	<u> </u>	

Results	West Otay Mesa "1-acre Parcels." Multiple West Otay Mesa "1-acre Parcels." Multiple owners either unavailable to contact or unwilling to sell. Unrealistic to cobble together sufficient acreage to meet project needs.												Otay Mesa "Davisson" parcels. Unavailable. Anticipating future development project.	
Owner	FELCO CONSTRUCTION INC LEE MICHAEL AISPURO TRUST 05-01-14 PARDEE HOMES HATTIE DAVISSON PROPERTIES LP		PARDEE HOMES	GUTIERREZ FAMILY LIVING TRUST 06-14-17	GARCIA MANUEL A	FLORES JOSEPH V&GUADALUPE	LANGARICA HERIBERTO P	PERIMBETI PRAKASH	SALAZAR SALVADOR E	AYALA LUCIA M	HATTIE DAVISSON PROPERTIES			
Acres	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.4
APN	64507617	64507618	64507619	64507620	64507621	64507622	64507623	64507624	64507625	64507625	64507625	64507625	64507626	64510105
Map No.				1		<u> </u>	26	•		·	•		·	27

Results								Otay Mesa "Davisson" parcels. Unavailable.	Anticipating future development project.							
Owner	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES							
Acres	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4
APN	64510106	64510107	64510108	64510204	64510205	64510206	64510207	64510208	64510209	64510210	64510303	64510304	64510305	64510306	64510307	64510308
Map No.			•				-			-						

Britannia Airway Logistics Center Project y of San Diego/Otay Mesa NNG Mitigation Parcel Search
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Results								Otay Mesa "Davisson" parcels. Unavailable. Anticipating future development project.	, , ,						
Owner	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	CLARA DAVISSON PROPERTIES	CLARA DAVISSON PROPERTIES	CLARA DAVISSON PROPERTIES	CLARA DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES	CLARA DAVISSON PROPERTIES	HATTIE DAVISSON PROPERTIES
Acres	1.4	1.4	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3
APN	64510309	64510310	64609105	64609106	64609107	64609108	64609109	64609110	64609111	64609112	64609114	64609205	64609208	64609209	64609210
Map No.								27							