



An Employee-Owned Company

June 5, 2023

Mr. Tom Simmons
Majestic Realty Company
13191 Crossroads Parkway North
City of Industry, CA 91746

Reference: Majestic Otay SPA – Proposed Change to TM5607 to an Industrial Project: Biological Resource Analysis (RECON Number 9105-2)

Dear Mr. Simmons:

Per the request of the County of San Diego Planning Department, the following tasks were conducted to update information regarding biological resources in relation to the proposed change to an industrial project: (1) site visits to the project site to verify and update the mapping of the vegetation communities and habitat assessments to determine the potential for the site to support specific sensitive species; (2) a survey of an off-site sewer connection that was not addressed in the previous biological technical report; and (3) an analysis of the changes to impacts to biological resources from the proposed revisions to Tentative Map (TM) 5607 to an industrial project was conducted to verify that these revised limits of disturbance were in substantial conformance with what was previously approved for the site.

1.0 Methods

A site visit to verify the vegetation mapping and assess the habitat for the potential to support sensitive species was made on February 8, 2023. Vegetation mapping in the field was aided using a recent aerial photograph. Habitat assessments of sensitive species included the plant species variegated dudleya (*Dudleya variegata*), prostrate navarretia (*Navarretia prostrata*), and San Diego button-celery (*Eryngium aristulatum* var. *parishii*); and for the sensitive wildlife species Quino checkerspot butterfly (*Euphydryas editha quino*). These assessments involved the evaluation of the habitat for each sensitive species in relation to the existing condition of the vegetation and with respect to each species-specific habitat requirements. A site visit to survey the proposed off-site utility alignment and continuation of the habitat assessment for sensitive plant species was made on May 8, 2023.

2.0 Survey Results

The results of the site visits are presented below for the vegetation mapping, habitat assessments for sensitive species, and survey results for the proposed off-site utility alignment.

2.1 Vegetation Mapping

2.1.1 Project Site

It was verified that the current distribution of vegetation communities within the project site is similar to what was previously reported (REC Consultants, Inc. 2017). A small increase of the native grassland area in the eastern corner of the property was noted but otherwise the other habitat types and aquatic resources are the same as previously mapped. The distribution of the vegetation communities is shown in Figure 1.

2.1.2 Off-site Utility Alignment

The proposed sewer line connection alignment would occur at the western terminus of the proposed Zinser Road in the northwest portion of the project site. The vegetation that occurs in this alignment is comprised of predominantly non-native grassland (see Figure 1). A small stand of eucalyptus woodland occurs at the west end of the survey area along with disturbed habitat. A small agricultural pond surrounded by berms on three sides occurs near the eastern end of the survey area.

2.2 Sensitive Species Habitat Assessment

Other than the species addressed below, there were no other sensitive species observed during the habitat assessments conducted on the project site.

2.2.1 Plants

Variegated Dudleya

No variegated dudleya individuals were observed during the current site check. Conditions in the spring of 2023 were appropriate for finding this species of dudleya as rainfall in the area is above normal. No individuals of this species were observed on the Majestic Otay site where the species was previously documented or in surrounding areas. The non-native grassland remains very dense, with a thick thatch of dead plant matter. As such, the site is no longer suitable for variegated dudleya and the species has likely been naturally extirpated on the site due to the change in habitat (i.e., lack of openings in the grassland). This species was last documented on the site in 2006, when only 11 individuals were observed, and was not found during surveys conducted in 2015 or 2016 (REC Consultants, Inc. 2017) and 2020 or 2021 (RECON Environmental, Inc. [RECON] 2020 and 2021). Given the current habitat conditions on the site, there is a low probability that the species still occurs on the site.

Prostrate Navarretia and San Diego Button-celery

No individuals of either prostrate navarretia or San Diego button-celery were observed during the current site visit. Each of the known vernal pools along with other low-lying areas on the site was searched for evidence of these species. The quality of the vernal pools on the site have been degraded somewhat by the invasion of non-native grasses which may affect the distribution of vernal pool species through displacement from competition for space and resources. In addition, dirt paths created by off-road vehicle activity have affected some of the vernal pools. Prostrate navarretia was last documented on the site in 1993 and San Diego button-celery was last observed on the site in 2004 when 30 individuals were found (REC Consultants, Inc. 2017). Neither species was observed during surveys conducted in 2015 or 2016 (REC Consultants, Inc. 2017) nor in a survey conducted in 2020 (RECON2020). Given the current habitat conditions on the site there is a low probability that these species still occur on the site.

2.2.2 Wildlife

Quino Checkerspot Butterfly

A general habitat assessment was conducted during the site visit to determine the likelihood of the Quino checkerspot butterfly to use the site. None of the preferred host, larval, or nectar plants was observed on the site. The dense growth and thatch of non-native grasses on the site has eliminated any previous openings in the habitat where these host, larval, and/or nectar plants would occur. The last protocol survey for Quino checkerspot butterfly conducted on the site occurred in 2016, and a small patch of dot-seed plantain was observed (REC Consultants, Inc. 2017). No Quino checkerspot butterfly or larvae were observed during that survey. In addition, a habitat assessment conducted in 2020 concluded that the on-site habitat conditions were not conducive for this butterfly species.

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(RECON 2020). Given the existing condition of a dense non-native grassland and thatch and lack of observation of any host or larval plants during the current habitat assessment, it was concluded that there is a low probability for the Quino checkerspot butterfly to occur on the site.

3.0 Substantial Conformance Review - Limit of Disturbance and Biological Resource Impacts

A review of the grading limits for the proposed industrial project was conducted to verify that the impacts to biological resources were in substantial conformance with as those addressed in the environmental impact report (KLR Planning 2018) and associated biological technical report (REC Consultants, Inc. 2017). The review concluded that the grading limits of disturbance for the proposed industrial project would impact less on-site biological resources than under the previously approved project. In particular, the new grading limits would avoid direct impacts to aquatic resources that include the disturbed wetlands associated with the abandoned agricultural pond and those that occur adjacent to a berm (Figure 2). Impacts to non-native grassland would also be reduced on-site in the area adjacent to these disturbed wetlands.

Off-site impacts associated with the sewer connection to the west of the project site were not addressed in previous biological resource studies. Installation of this off-site sewer connection would be achieved by trenching the pipeline alignment, placement of the sewer pipeline, and then filling in the excavated trench with the native material removed. This construction activity would impact approximately 0.65 acre of non-native grassland and 0.08 acre of disturbed habitat off-site to the west of the proposed terminus of Zinser Road. The reduction in on-site impacts to an estimated 8 acres of non-native grassland would be more than the impacts associated with the off-site sewer connection and, therefore, no increase in impacts previously reported. No additional mitigation would be required.

The grading limits of disturbance for the proposed change of TM5607 to an industrial project with respect to impacts to biological resources would be in substantial conformance with the previous environmental documents. Overall, there would be a reduction in direct impacts to aquatic resources and no increase in impacts to non-native grassland due to the construction of the off-site sewer connection as impacts to this habitat type are being reduced on-site.

If you have any questions regarding this biological resource impact analysis, please contact me at (619) 308-9333 ext. 171 or at gscheid@reconenvironmental.com.

Sincerely,



Gerry Scheid
Senior Biologist
County of San Diego Certified Preparer

GAS:sh

cc: Emilie Colwell; T&B Planning, Inc.
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References Cited

KLR Planning

2018 Final Supplemental Environmental Impact Report: Otay 250 Sunroad – East Otay Mesa Business Park Specific Plan Amendment. PDS2015-SPA-15-001, PDS2015-GPA-15-008, PDS2015-REZ-15-007, PDS2015-TM-5607; Log No. PDS2015-ER-15-98-190-13G; SCH No. 2016031028. March.

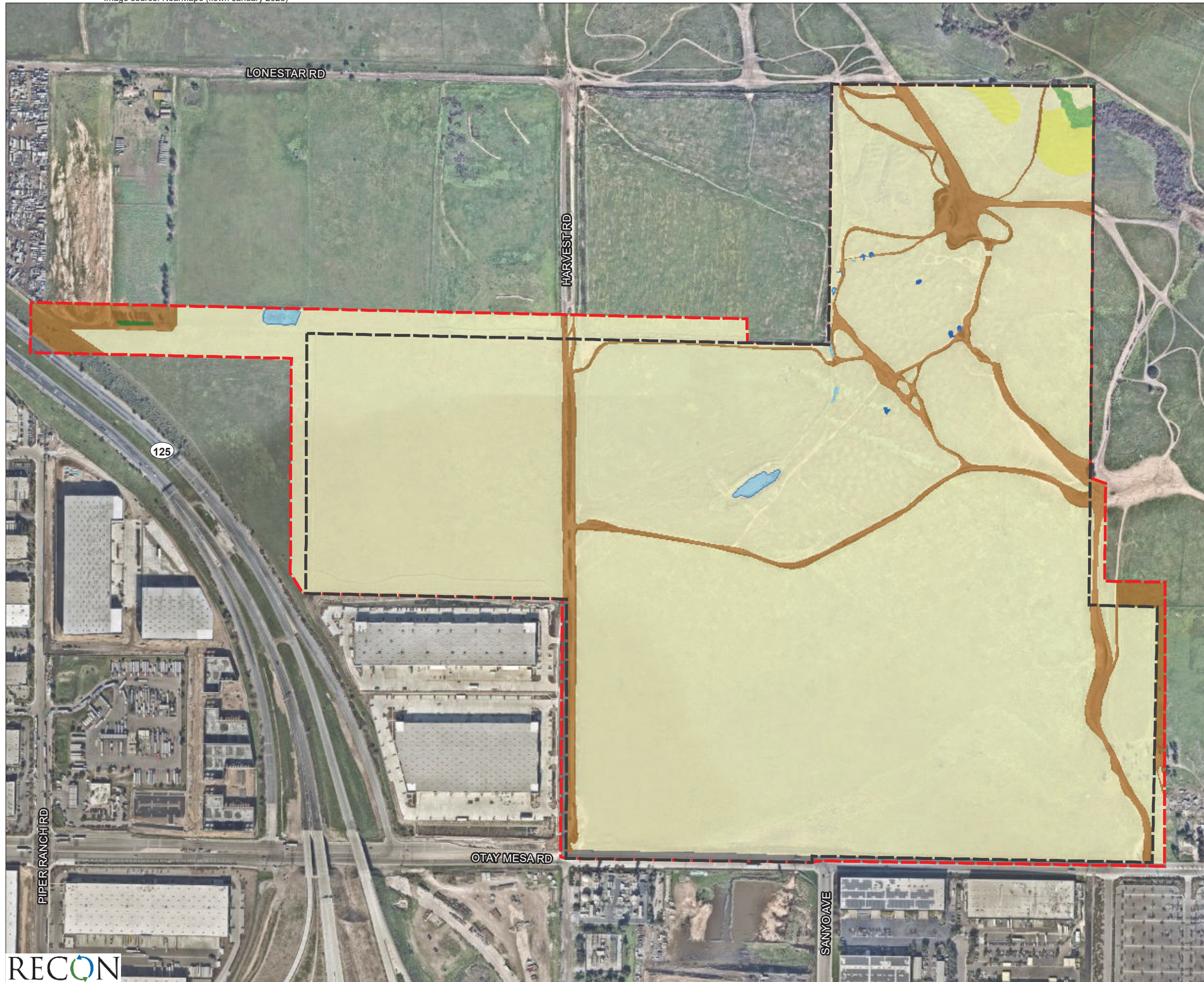
REC Consultants, Inc.

2017 Biological Technical Report for the Otay 250 SPA Project, PDS2015-SPA-001. Prepared for Sunroad Enterprises, March.

RECON Environmental, Inc.

2020 Otay 250 SPA – Rare Plant Search and Wildlife Habitat Assessment; Prepared for Sunroad Enterprises. May.

2021 Otay 250 SPA – Variegated Dudleya Survey; Prepared for Sunroad Enterprises. May.













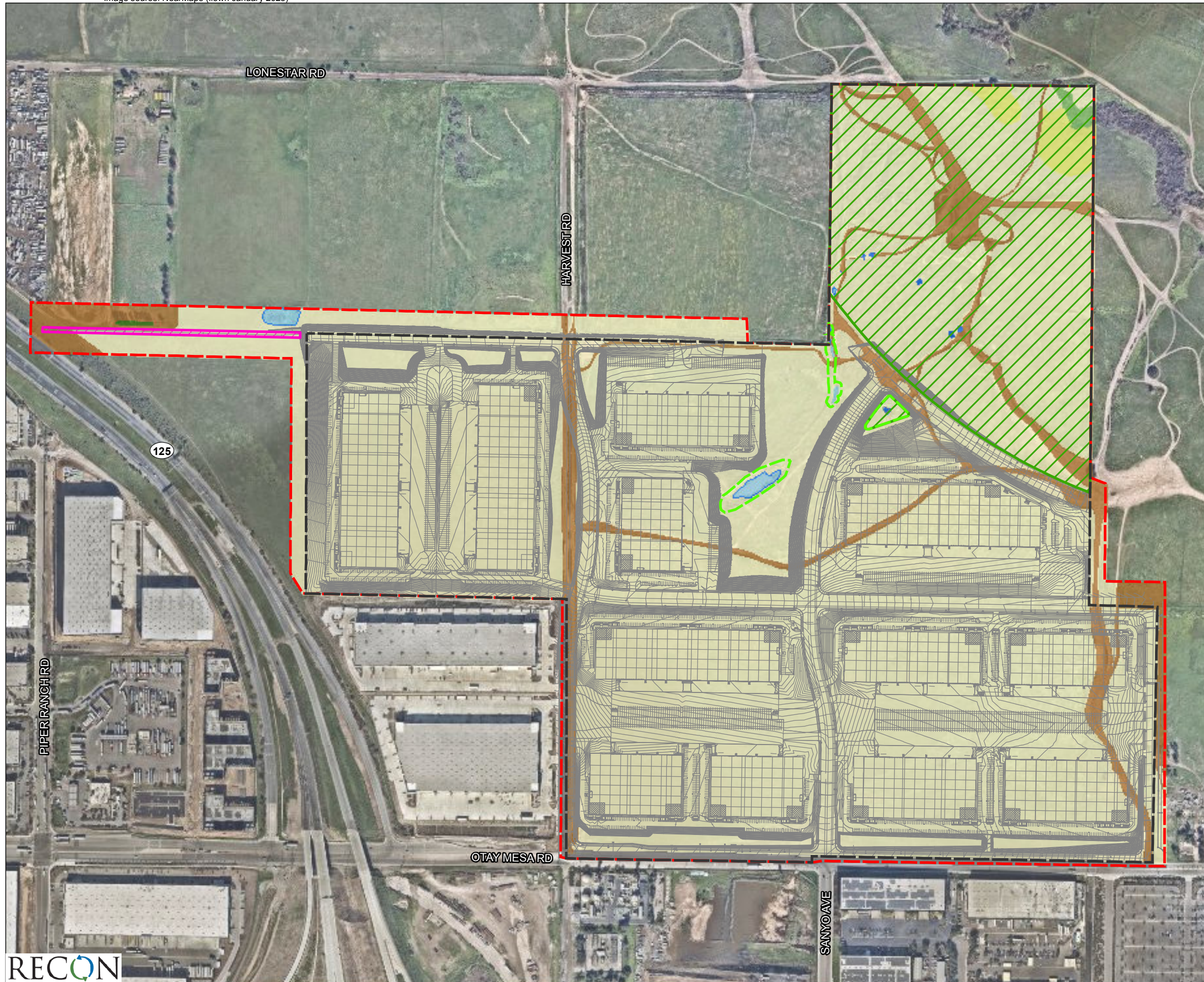
-  Parcel Boundary
-  Survey Area (2023)
- Vegetation Community**
-  Native Grassland
-  Non-native Grassland
-  Vernal Pool
-  Disturbed Wetland
-  Non-native Riparian
-  Eucalyptus Woodland
-  Disturbed Habitat
-  Developed



FIGURE 1
Majestic Otay SPA
Existing Vegetation



- Parcel Boundary
 - Survey Area (2023)
 - Proposed Industrial Project Limits
 - Off-site Sewer Impacts Wetland
 - Open Space Boundary Dedicated
 - Open Space Areas
- Vegetation Community**
- Native Grassland
 - Non-native Grassland
 - Vernal Pool
 - Disturbed Wetland
 - Non-native Riparian
 - Eucalyptus Woodland
 - Disturbed Habitat
 - Developed



FIGURE 2
Majestic Otay SPA
Proposed Industrial Project Impacts