



An Employee-Owned Company

March 1, 2024

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

Reference: Majestic Otay SPA – Assessment of Potential for Occurrence for Western Spadefoot Toad and Crotch’s Bumblebee (RECON Number 9105-2)

Dear Mr. Simmons:

Per the request of the County of San Diego Planning Department, a general assessment was conducted to evaluate the potential for the Majestic Otay project site to support the following two sensitive species: western spadefoot toad (*Spea hammondi*) and Crotch’s bumble bee (*Bombus crotchii*). The general assessment was based on existing data from site visits conducted in February and May of 2023 regarding the quality of the habitat present in relation to each species requirements and a search of the California Natural Diversity Data Base (CNDDDB) species occurrence database (California Department of Fish and Wildlife [CDFW] 2024) and the U.S. Fish and Wildlife Service (USFWS) all species occurrence database (USFWS 2022).

1.0 Potential for Western Spadefoot Toad

The western spadefoot toad is a CDFW species of special concern and a species proposed for federal listing as threatened (USFWS 2023). Habitat for the western spadefoot includes lowlands, washes, floodplains of rivers, alluvial fans, alkali flats, temporary ponds, and vernal pools. This species is generally found in areas of open vegetation with sandy or gravelly soil (Stebbins 2003). However, the species has been observed in vernal pools containing clay soils on Otay Mesa (CDFW 2024).

There is a moderate potential for western spadefoot toad to occur on the project site. There are vernal pools present on-site and disturbed wetlands comprised of two agricultural ponds and a depression feature along the base of an existing berm. These features can hold water during a normal or above normal wet season sufficient to support the life cycle of this toad species. Historic occurrences of western spadefoot toad are recorded within a half mile to the north in vernal pools and wetlands associated with Johnson Canyon.

The proposed project will avoid direct impacts to the vernal pools and other disturbed wetlands on the site. These wetland areas will have setback buffers around them to limit any indirect impacts and will be preserved in dedicated open space easements. Therefore, no impacts are anticipated to occur to the western spadefoot toad, if present. However, it is recommended that during construction of the proposed project that barrier silt fencing be installed at the outer limit of the buffer area for each open space area containing a wetland feature to prevent western spadefoot toads if present from entering the active disturbance area.

2.0 Potential for Crotch’s Bumblebee

The Crotch’s bumble bee is a state of California candidate for listing as an endangered species (CDFW 2023). This species prefers open grassland and shrub habitats that support populations of nectar plants such as snapdragon (*Antirrhinum* spp.), phacelia (*Phacelia* sp.), clarkia (*Clarkia* spp.), bush poppy (*Dendromecon rigida*), California poppy

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(*Eschscholzia californica*), and buckwheat (*Eriogonum* spp.). In California, its distribution is exclusive to coastal areas from San Diego to Redding.

There is a low potential for Crotch's bumble bee to forage or nest on the project site. Much of the project site supports dense non-native grassland with few natural openings to support the preferred nectar plants for the species. The dense growth and thatch of non-native grasses on the site has eliminated any historic openings in the habitat where these nectar plants would occur and observations of substantial populations for preferred nectar plants is lacking for the site. In addition, portions of the project site have been historically used for agricultural purposes and currently the eastern part of the site is subject to ongoing off-road-vehicle activity. These disturbances have affected the overall habitat quality of the area.

One historic occurrence of Crotch's bumble bee was recorded in 1998 to the southeast of the project site. Most of the area where this occurrence was recorded has now been developed and any remaining suitable habitat now occurs further to the east and separated from the project site by development.

If you have any questions regarding this species assessment, 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.
Tracy Zinn, T&B Planning, Inc.

References Cited

California Department of Fish and Wildlife (CDFW)

2023 State and Federally Listed Endangered, Threatened, and Rare Plants of California. Natural Diversity Database. October.

2024 Natural Diversity Data Base. RareFind Version 5.

Stebbins, Robert C.

2003 *A Field Guide to Western Reptiles and Amphibians*. 3rd ed., revised. Houghton Mifflin, Boston.

U.S. Fish and Wildlife Service (USFWS)

2022 All Species Database.

2023 Endangered and Threatened Wildlife and Plants: Threatened Status With Section 4(d) Rule for the Northern and Southern Distinct Populations Segments of the Western Spadefoot. 88-FR 84252. December 5.