Biological Technical Report for the Palm/Hollister Project

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1.0 INTRODUCTION

This letter report describes the biological resources on the approximately 5.9-acre Palm/Hollister Project site and is intended to provide the City of San Diego (City) with information necessary to assess impacts to biological resources under the California Environmental Quality Act (CEQA).

1.1 PROJECT LOCATION

The project site is located at 555 Hollister Street, San Diego, California 92154 (Figures 1 and 2) and is outside the Coastal Overlay Zone.

1.2 PROJECT DESCRIPTION

The Palm/Hollister project is located on a 5.92-acre site in the Otay Mesa-Nestor Community Plan area, situated north of the Palm Avenue Trolley Station, south of the Otay Valley Regional Park, and to the east of Hollister Avenue. The project site has been previously graded and is undeveloped, with the exception of a vacant residential structure and out-buildings. The project is a proposal to develop the entire site.

Located within a Transit Priority Area, the Palm & Hollister project proposes development of multi-family housing proximate to the Palm Avenue Trolley Station. A total of 198 residential units, including eight affordable housing units, would be provided in 13 buildings. The unit mix would include one bedroom/one bath, two bedroom/two bath, and three bedroom/two bath units. Buildings would be one level, two levels and three levels with tuck-under garages and one-level units over carports. The outdoor amenities would be provided throughout the site. Amenities in the western portion of the project site associated with Building 1 would feature a pool, spa, fire pit, patio/barbecue areas, fitness center, co-working spaces, and the leasing office. An additional resident amenity area would be provided in the central portion of the project site in the courtyard of Building 3, incorporated as an open courtyard in the center of the largest building. Situated to take advantage of views into the Otay Valley Regional Park located north of the project site, this resident amenity would feature a bar-b-que pavilion, fire table, turf area incorporating a nature playground, game courts, and sofa seating areas. An outdoor amenity space would also be provided in the northeastern area of the site, north of Building 5. A pedestrian landscaped walkway along the top of the northern slope provides views of the River Valley and a continuous connection from the residential buildings to the project amenity areas. A total of 267 parking spaces would be provided as individual tuck-under garages, carports, and surface spaces.

Approximately 5.5 acres of the 5.92-acre project site would be graded. Grading would involve approximately 15,000 cubic yards of cut and approximately 38,500 cubic yards of fill, with approximately 23,500 cubic yards of import. In addition, remedial grading would involve 67,000 cubic yards of excavation to depths of 17 feet.

Vehicular access to the project would be from the south along in the western portion of the project site via an existing access easement through property owned by San Diego Metropolitan Transit Development (SDMTD). The project includes an off-site impact area, which is paved, through this SDMTD property. This off-site access also provides access to SDMTDPedestrian access to the Palm Avenue Trolley Station and Palm Avenue would also be provided parking. within the access easement.

The project would require an amendment to the Otay Mesa-Nestor Community Plan to change the existing land use from Open Space to Residential Medium-High Density (20-35 dwelling units/net residential area) and a Rezone to change the existing zone from AR-1-2, RM-1-1, and RS-1-5 to RM-2-6. A Rezone requires the proposed project analyze the most intense use permitted under the new zone. Under the proposed RM-2-6 zone, the project site could be developed to construct up to 206 dwelling units. This equates to an additional eight dwelling units compared to the proposed project, which plans to construct a total of 198 dwelling units. Adding eight dwelling units would not affect the analysis and conclusions of this report, as both the proposed project and development with the most intense use would require disturbance of the same area.

2.0 METHODS AND SURVEY LIMITATIONS

2.1 LITERATURE REVIEW

Prior to the field investigation, Alden Environmental, Inc. (Alden) queried the California Natural Diversity Database (CNDDB), U.S. Fish and Wildlife Service (USFWS) species database, and SanBIOS database for sensitive species reported to occur on the site or nearby. Alden also reviewed City Multi-habitat Planning Area (MHPA) mapping as well as current and historic aerial imagery of the site and its surroundings and reviewed National Wetland Inventory and National Hydrography Dataset mapping for potential wetlands and waterways on or connected to the site.

2.2 BIOLOGICAL SURVEYS

Alden biologist Greg Mason surveyed the project site on foot on April 22, 2021. The survey consisted of: 1) mapping vegetation; 2) searching for special status plant species; 3) compiling lists of plant and animal species observed or detected (Appendices A and B, respectively); and 4) taking representative photographs of the site (Appendix C). Special attention was paid to the northern portion of the site that is within the mapped MHPA (i.e., the City's preserve) of the City's Multiple Species Conservation Program (MSCP) Subarea Plan (City 1997a) and/or the Baseline Conservation Area of the City's Vernal Pool Habitat Conservation Plan (VPHCP; City 2017).

Since no vernal pool resources were found during the site-specific survey (and no impervious soils are mapped on site; see Section 5.1, *Physical Characteristics*), and the National Wetland Inventory and National Hydrography Dataset show no wetland resources on or connected to the site, it has been determined that no vernal pool resources are present on site, and the VPHCP does not apply.

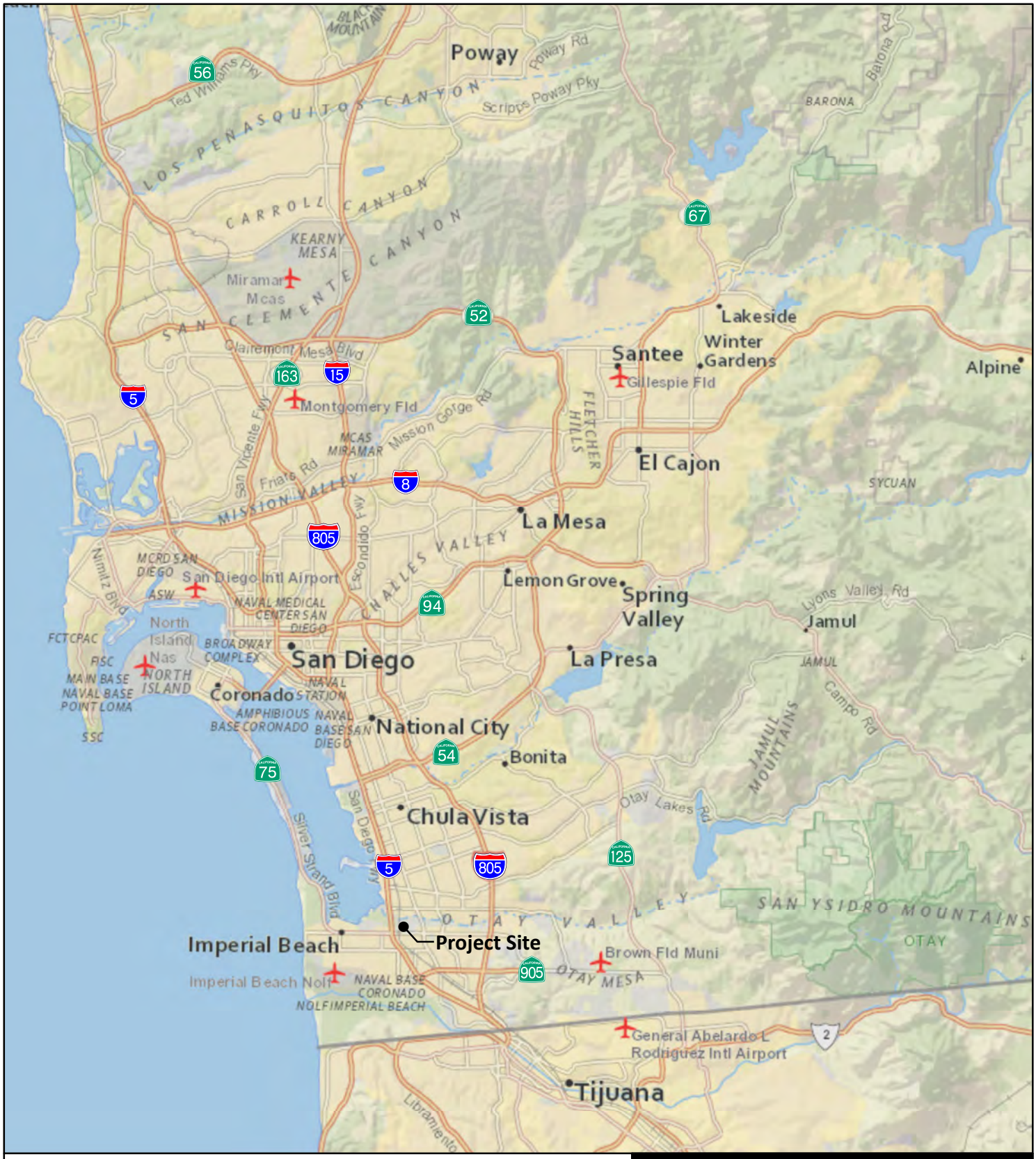

Figure 1

Regional Location

PALM HOLLISTER

N
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0 2 4 Miles

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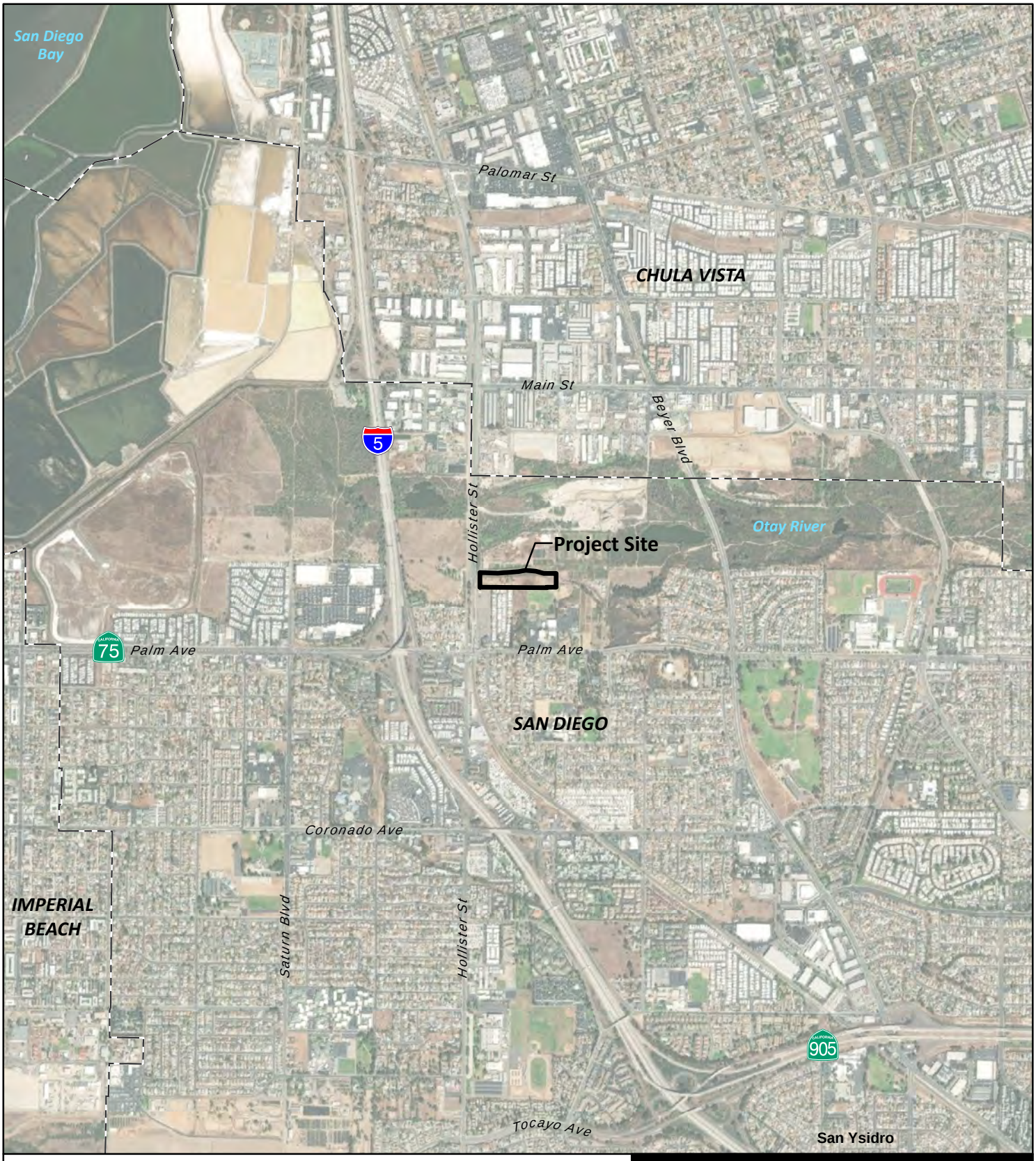

N
W E
S

0 1,000 2,000 Feet

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Figure 2

Project Location

PALM HOLLISTER

2.2.1 Vegetation Mapping

Mr. Mason walked the project site on April 22, 2021 and mapped the vegetation by hand on current aerial imagery at a scale of 1 inch equal to 80 feet. Vegetation mapping took into account the City's defined differentiation between non-native grassland and other disturbed areas (City 2018). That is, the relative percent cover of herbaceous species was used to distinguish between non-native grassland and disturbed; vegetation on the parcel was characterized and mapped as disturbed land where non-native grass species comprised a relative cover of less than 50 percent (no areas on site represented non-native grassland based on the City's definition). Representative photographs of the vegetation on site were taken during the vegetation mapping (Appendix C).

2.2.2 Sensitive Species

Sensitive plant species are those that are considered federal, State, or California Native Plant Society (CNPS) rare, threatened, or endangered; and/or MSCP Covered Species (which includes MSCP Narrow Endemic species).

Sensitive animal species are those that are considered federal or State threatened or endangered (under the endangered species acts); a federal bird of conservation concern; State species of special concern, State fully protected species; State watch list species; and/or MSCP Covered Species (which includes MSCP Narrow Endemic species).

Plant Species

Mr. Mason searched for sensitive plant species as he walked the site and mapped vegetation on April 22, 2021. This date is during the blooming period for most sensitive, annual plant species. He paid special attention for the one species that resulted from the database queries (i.e., singlewhorl burrobrush [*Ambrosia monogyra*]). During this site visit, he compiled a list of all plant species he observed (Appendix A).

Animal Species

Mr. Mason searched for sensitive animal species as he walked the site and mapped vegetation on April 22, 2021. He paid special attention for one species that resulted from the database queries (i.e., coast horned lizard [*Phrynosoma blainvillii*]) and another that was determined to have moderate potential to occur on a project site across Hollister Street (i.e., burrowing owl [*Athene cunicularia*]). During this site visit, he compiled a list of all animal species he observed or detected (Appendix B).

2.2.3 Survey Limitations

Because the site was surveyed on just one occasion, during one season of the year, and during daylight hours, there is some possibility that sensitive migratory or nocturnal species could have been missed. Therefore, this report addresses potential impacts to species that may have at least moderate potential to occur and includes mitigation should those species be determined to be present.

2.2.4 Nomenclature

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); California Native Plant Society (CNPS; 2022); Crother (2008); American Ornithological Society (2020); Jones, et al. (1992); and CDFW (2022).

3.0 REGULATORY CONTEXT

3.1 REGULATORY ISSUES

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

3.1.1 Federal

Endangered Species Act

Administered by the USFWS, the federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered take under the ESA. Section 9(a) of the ESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns. No federal-listed species were observed or detected on site, and based on the habitat area and/or conditions on site (disturbed and developed), none is expected to occur.

Migratory Bird Treaty Act

All migratory bird species that are native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is intended to protect migratory birds but it does not mandate specific protections. Typically, protection of migratory birds through the MBTA is provided through restrictions on disturbance of active bird nests during the nesting season (February 1 to September 15). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. As a general/standard condition, the project must comply with the MBTA.

Clean Water Act

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the Clean Water Act. The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the Clean Water Act is to restore and maintain the chemical, physical, and biological integrity of all Waters of the U.S. Permitting for projects filling Waters of the U.S. (including wetlands) is overseen by the Corps under Section 404 of the Clean Water Act. Projects could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed independently based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than 6 months) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions. No potential Waters of the U.S. were identified on or connected to the site.

The project will comply with applicable federal requirements.

3.1.2 State of California

California Environmental Quality Act

Primary environmental legislation in California is found in CEQA and its implementing guidelines (State CEQA Guidelines), which require that projects with potential adverse effects (or impacts) on the environment undergo environmental review. Adverse environmental impacts are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Endangered Species Act

The California ESA is similar to the federal ESA in that it contains a process for listing of species and regulating potential impacts to listed species. Section 2081 of the California ESA authorizes the California Department of Fish and Wildlife (CDFW) to enter into a memorandum of agreement for take of listed species for scientific, educational, or management purposes. No State-listed species were observed or detected on site, and based on the habitat area and/or conditions on site (disturbed and developed), none is expected to occur.

California Fish and Game Code

California Fish and Game Code (Sections 1600 through 1603) requires a CDFW agreement for projects affecting riparian and wetland habitats (Waters of the State) through issuance of a Streambed Alteration Agreement. The project would not affect any wetland/riparian habitat as none is present. In addition, any project that requires a Section 404 Permit also would require a Water Quality Certification by the California Regional Water Quality Control Board (RWQCB) under Section 401 of the Clean Water Act. The project would not affect any Waters of the U.S. on site that would be subject to Section 401 since none is present.

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. Avian species protected by California Fish and Game Code may nest on the project site. As a general/standard condition, the project must comply with California Fish and Game Code.

Porter-Cologne Water Quality Control Act of 1970

The Porter-Cologne Water Quality Control Act of 1970 grants the State Water Resource Control Board and its regional offices power to protect water quality and is the primary vehicle for implementation of the State's responsibilities under Section 401 of the Clean Water Act. The Porter-Cologne Act grants the State Water Resource Control Board authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. Typically, the State Water Resource Control Board and Regional Water Quality Control Board act in concert with the Corps under Section 401 of the Clean Water Act in relation to permitting fill of Waters of the U.S.

The project will comply with applicable State requirements.

3.1.3 City of San Diego Environmentally Sensitive Lands Regulations

Mitigation requirements for significant impacts to 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 MHPA. The northern portion of the site is mapped within the MHPA. According to ESL regulations, development inside the MHPA must be located in the least sensitive portion of a given site. However, the project proposes development of the entire site.

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.

The project will comply with all applicable City Biology Guidelines.

4.0 REGIONAL CONTEXT

4.1 MULTIPLE SPECIES CONSERVATION PROGRAM SUBAREA PLAN

The City, USFWS, CDFW, other local jurisdictions, and members of the environmental and building and development communities 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 that is compatible with growth and 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 (IA), which is the contract between the City, USFWS, and CDFW (City 1997b). The IA ensures implementation of the City's Subarea Plan and thereby allows the City to issue "take" permits under the federal ESA and State Endangered Species Act to address impacts at the local level. Under the federal ESA, 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 IA, 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, endangered and 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 Incidental Take Permit and considered to be adequately protected within the City's Preserve, the MHPA, provided that a project complies with the implementing regulations (i.e., ESL regulations) as required by the City's Biology guidelines. Generally, impacts to Covered Species must be avoided to the extent possible, and Area Specific Management Directives identified for each Covered Species in Appendix A of the City's Subarea Plan must be addressed relative to each specific project.

Section 1.4.2 of the of the City's Subarea Plan outlines general planning policies and design guidelines for projects within or adjacent to the MHPA. In addition, Section 1.5.3 of the City's Subarea Plan outlines general management directives that apply to all areas of the City's MSCP Subarea plan, as appropriate.

4.1.1 Multi-habitat Planning Area

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 northern portion of the site is mapped within the MHPA (Figure 3).

While the City's MHPA mapping shows the northern portion of the project site within the MHPA, this area does not contain native habitat with the ability to support a diversity of plant and animal life, and it has not done so since some time prior to the early 1950s. Available aerial imagery of the site from 1953 through 2016 (Nationwide Environmental Title Research, LLC [NETR] 2021) shows the site as relatively unchanged from its current disturbed and developed condition; although, for many of the years during that period the current disturbed portions of the site were in active agriculture. As required, the project proposes an MHPA boundary line adjustment.

4.1.2 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. Because the project includes development adjacent to the MHPA, conformance with the adjacency guidelines would be required as discussed in Section 6.2, *Land Use Adjacency Guidelines*.

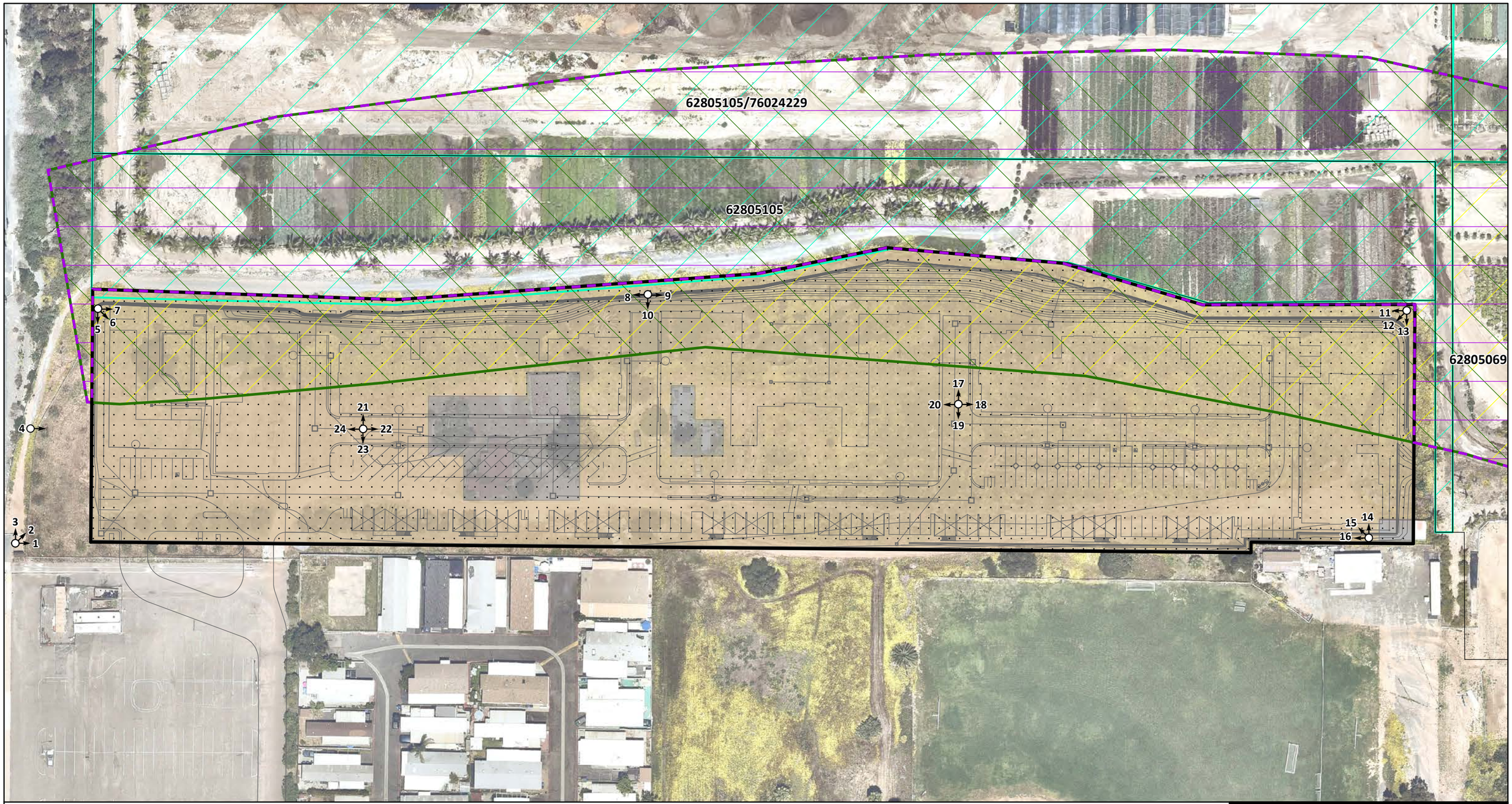
5.0 SURVEY RESULTS

5.1 PHYSICAL CHARACTERISTICS

Available aerial imagery of the site from 1953 through 2016 (Nationwide Environmental Title Research, LLC [NETR] 2021) shows the site as relatively unchanged from its current disturbed and developed condition; although, for many of the years during that period the current disturbed portions of the site were in active agriculture. Currently, upper flat portion of the is a graded pad being used as a construction staging area for materials and heavy equipment.

The northern boundary of the site lies adjacent a plant nursery and a paved access road to the nursery. Trolley tracks and Hollister Street lie to the west of the site. To the east, the land has been disturbed but is undeveloped. South of the site lies a baseball diamond associated with a school, an undeveloped lot, a mobile home park, and large parking lots associated with a commercial property and the Palm Avenue trolley station.

Elevations on site range from 22 to 58 feet above mean sea level. According to the Natural Resource Conservation Service Soil Survey, the soils on site include Huerhuero loams and Visalia gravelly sandy loam.



Property Boundary
Project Impacts
Photo Location

Existing MHPA Boundary
Proposed MHPA Boundary

VPHCP Baseline Conservation
100
75 - 99

Vegetation
Disturbed Land
Developed

N
W E
S

0 40 80
Feet

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Figure 3

Biological Resources

PALM HOLLISTER

5.2 VEGETATION COMMUNITIES/LAND COVER TYPES

The entire site was mapped as disturbed land and developed as described below (also see Table 1 and Figure 3).

Table 1
VEGETATION COMMUNITIES/LAND COVER TYPES ON SITE

Vegetation Community/ Land Cover Type[1]	Acres Outside the MHPA	Acres Inside the MHPA	Total Acres
Disturbed Land (Tier IV)	3.4	2.2	**5.6**
Developed (No tier)	0.3	0.0	**0.3**
TOTAL	**3.7**	**2.2**	**5.9**

[1]Tier IV (other upland) is not considered sensitive by the City. Developed is a land cover type that is not assigned to a tier of sensitivity by the City.

Disturbed Land

Disturbed land includes land cleared of vegetation, containing a preponderance of non-native plant species, or showing signs of past or present usage that does not provide viable wildlife habitat. Almost the entire site is disturbed land that comprises areas cleared and being used as a construction staging area or that supports area predominated by non-native plant species. Typical plant species in disturbed land on site include garland daisy (*Glebionus coronaria*), Hottentot's fig (*Carpobrotus edulis*), black mustard (*Brassica nigra*), and star thistle (*Centaurea melitensis*). Disturbed land is considered Tier IV (other upland) by the City and is not sensitive.

Developed

Developed land is where permanent structures, landscaping, and/or pavement have been placed, which prevents the growth of native vegetation. On site, developed land is comprised of unoccupied residential buildings and a small area in the site's southeast corner used for storage. Developed land is not assigned to a tier by the City and is not sensitive.

5.3 PLANT SPECIES OBSERVED

Thirty-seven species of plants have been observed on site. A list of these plant species is presented in Appendix A.

5.4 ANIMAL SPECIES OBSERVED OR DETECTED

Nine species of animals have been observed or detected on site. A list these animal species is presented in Appendix B.

5.5 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).

5.5.1 Sensitive Vegetation Communities

In addition to City Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City 2018), sensitive vegetation communities are those considered rare within the region or sensitive by CDFW (Holland 1986). These communities, in any form (e.g., disturbed), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site does not support any sensitive vegetation communities.

5.5.2 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 2022). 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.

The database queries returned a single report of special status plant species, singlewhorl burrobrush, potentially from the site in 1936. No sensitive plant species were observed on site, and none is expected to occur due to the disturbed and developed condition of the site (Tables 2 and 3).

Table 2 SENSITIVE PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
Singlewhorl burrobrush (*Ambrosia monogyra*)	CNPS Rank 2B.2	Chaparral and Sonoran desert scrub with sandy soils. In California, found in Riverside, San Bernardino, and San Diego counties.	August to November	Not expected. While reported from 1936 within 1 mile of the site, and possibly on site, per the CNDDB, there is currently no habitat for this species on the site.
San Diego sagewort (*Artemisia palmeri*)	CNPS Rank 4.2	Stream courses, often within coastal sage scrub and southern mixed chaparral. Coastal San Diego County and Baja California, Mexico.	(February) May to September	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Golden-spined cereus (*Bergerocactus emoryi*)	CNPS Rank 2B.2	Sandy soils and dry bluffs along the coast associated with maritime succulent scrub. Coastal San Diego County; Baja California, Mexico; San Clemente and Catalina islands.	May to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*)	CNPS Rank 1B.1	Dry, stony places associated with coastal scrub or chaparral near the coast. Near the coast from San Luis Obispo County south to northern Baja California, Mexico.	April to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
San Diego barrel cactus (*Ferocactus viridescens*)	CNPS Rank 2B.1 MSCP Covered	Diegan coastal sage scrub hillsides, often at the crest of slopes and growing among cobbles. Occasionally found on vernal pool periphery and mima mound topography in Otay Mesa. San Diego County and Baja California, Mexico.	May to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.

Table 2 (cont.) **SENSITIVE PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
Beach goldenaster (*Heterotheca sessiliflora* ssp. *sessiliflora*)	CNPS Rank 1B.1	Chaparral, coastal dunes, and coastal scrub. San Diego County and Baja California, Mexico.	March to December	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*)	CNPS Rank 1B.2	Chaparral and coastal scrub (often in disturbed, sandy areas). Orange and San Diego counties; Baja California, Mexico; San Clemente and Santa Catalina islands.	April to November	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
San Diego marsh-elder (*Iva hayesiana*)	CNPS Rank 2B.2	Intermittent streambed with an open riparian canopy. Often sandy alluvial embankments with cobbles. San Diego County and Baja California, Mexico.	April to October	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)	CNPS Rank 4.3	Openings in chaparral and coastal scrub scrub. Southwestern California and the Channel Islands.	January to July	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.

[1]**CNPS (California Native Plant Society) Rare Plant Rank**

1B – Rare, threatened, or endangered in California and elsewhere
2B – Rare, threatened, or endangered in California but more common elsewhere
3 – More information is needed – a review list
4 – Limited distribution – a watch list
.1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
.2 – Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat)
.3 – Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

City

MSCP Covered - Covered Species are those species included in the Incidental Take Authorization issued to the City by the USFWS and CDFW.

Table 3 NARROW ENDEMIC AND VERNAL POOL PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
NARROW ENDEMIC[1] SPECIES				
San Diego thornmint (*Acanthomintha ilicifolia*)	FT SE CNPS Rank 1B.1	Occurs on clay lenses in grassy openings in chaparral or sage scrub. Prefers friable or broken, clay soils. Range limited to coastal areas of San Diego County and Baja California, Mexico.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within one mile of the site.
Shaw's agave (*Agave shawii*)	CNPS Rank 2B.1	Coastal sage scrub and coastal bluff scrub. Range limited to coastal areas of San Diego County and Baja California, Mexico.	September to May	Not expected. No habitat is present on site. Not reported to the CNDDB within one mile of the site.
San Diego ambrosia (*Ambrosia pumila*)	FE CNPS Rank 1B.1	Found (often) in disturbed areas within sandy loam or clay soils in chaparral, coastal sage scrub and grasslands. Range includes San Diego and Riverside counties and Baja California, Mexico.	April to October	Not expected. Habitat is not present on site. Not reported to the CNDDB or USFWS within one mile of the site.
Aphanisma (*Aphanisma blitoides*)	CNPS Rank 1B.2	Occurs in sandy areas along the coast. Range includes islands off the southern California coast from San Onofre to Imperial Beach in San Diego County.	April to May	Not expected. No habitat is present on site. Not reported to the CNDDB within one mile of the site.
Coastal dunes milk vetch (*Astragalus tener* var. *titi*)	FE SE CNPS Rank 1B.1	Occurs in sandy places along the coast, including coastal dunes.	March to May	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Encinitas baccharis (*Baccharis vanessae*)	FT SE CNPS Rank 1B.1	Occurs on sandstone soils in chaparral, known from the Encinitas area.	August to November	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

Table 3 (cont.) **NARROW ENDEMIC AND VERNAL POOL PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
NARROW ENDEMIC[1] SPECIES (continued)				
Thread-leaved brodiaea (*Brodiaea filifolia*)	FT SE CNPS Rank 1B.1	Clay soils in vernally moist grasslands and on vernal pool peripheries.	March to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Short-leaved dudleya (*Dudleya blochmaniae* ssp. *brevifolia*)	SE CNPS Rank 1B.1	Occurs on Torrey sandstone soils in chaparral and coastal scrub.	April	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.
Variegated dudleya (*Dudleya variegata*)	CNPS Rank 1B.2	Occurs on clay soil in chaparral, coastal sage scrub, grasslands and near vernal pools.	May to June	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.
Otay tarplant (*Deinandra conjugens*)	FT SE CNPS Rank 1B.1	Occurs on clay soils in coastal scrub and valley and foothill grasslands in southern San Diego County.	(April) May to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Snake cholla (*Opuntia parryi* var. *serpentina*)	CNPS Rank 1B.1	Chaparral and coastal scrub in San Diego County and Baja California, Mexico.	April to May	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.

Table 3 (cont.) **NARROW ENDEMIC AND VP PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
VERNAL POOL SPECIES				
San Diego button-celery (*Eryngium aristulatum* var. *parishii*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Mesic coastal scrub, valley and foothill grassland, and vernal pool habitats in southern California and Baja California, Mexico.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Spreading navarretia (*Navarretia fossalis*)	FT CNPS Rank 1B.1 VPHCP Covered	Occurs in chenopod scrub, marshes and swamps and vernal pools.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Orcutt grass (*Orcuttia californica*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Vernal pools in southern California and Baja California, Mexico.	April to August	Not expected. No vernal pool habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Orcutt grass (*Orcuttia californica*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Vernal pools in southern California and Baja California, Mexico.	April to August	Not expected. No vernal pool habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
San Diego mesa mint (*Pogogyne abramsii*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Occurs in vernal pools in San Diego County.	March to July	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

Table 3 (cont.) **NARROW ENDEMIC AND VP PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
VERNAL POOL SPECIES (continued)				
Otay mesa mint (*Pogogyne nudiuscula*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Occurs in vernal pools in San Diego County and Baja California, Mexico.	May to July	Not expected. No habitat for this species is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

[1]**Federal**
FE – Federal listed endangered
FT – Federal listed threatened
State
SE – State listed endangered
CNPS (California Native Plant Society) Rare Plant Rank
1B – Rare, threatened, or endangered in California and elsewhere
.1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
.2 – Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat

City of San Diego
Narrow Endemic - Some native species with restricted geographic distributions, soil affinities, and/or habitats.

VPHCP Covered - The Vernal Pool Habitat Conservation Plan was developed using the requirements of a Habitat Conservation Plan under Section 10(a)(1)(B) of the federal Endangered Species Act as the basis for take authorization for the seven covered vernal pools species (i.e., Vernal Pool Covered Species).

5.5.3 Sensitive Animal Species

Sensitive animal species are those that are considered federal or State 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 2022) as a State Species of Special Concern, State Watch List species, State Fully Protected species, or federal Bird of Conservation Concern.

No sensitive animal species were observed on site, and none is likely to occur due to the disturbed and developed condition of the site (Table 4). Of the sensitive species with any potential to occur, only the burrowing owl was assessed as having a low potential (non-significant) to occur. As noted in Table 4, there are no database records for the burrowing owl within 1 mile of the site. While a survey report (RECON 2020) for another project across Hollister Street determined that there was moderate potential for the species to occur on that site, no burrowing owl or active burrows were observed during the four surveys conducted in late 2019/early 2020 for that project. No potential burrowing owl burrows were observed on the Palm/Hollister site. A single ground squirrel was observed on the eastern portion of the site; however, there was no evidence of owl occupation. Ground squirrels are ubiquitous across the County and are not an indicator of burrowing owl presence. Most of the site currently supports a graded pad being used as a construction staging area for materials and heavy equipment. In addition, the site is surrounded by development and the adjacent lands are not considered to be burrowing owl habitat (open, non-native grassland fields).

Table 4 SENSITIVE ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
INVERTEBRATES			
Quino checkerspot butterfly (*Euphydryas editha quino*)	FE	Potential habitat includes vegetation communities with areas of low-growing and sparse vegetation including open stands of sage scrub and chaparral, adjacent open meadows, old foot trails, and dirt roads. Primary larval host plant in San Diego at low elevations is dwarf plaintain (*Plantago erecta*).	Not expected. While reported within 1 mile of the site per the USFWS, there is no habitat for this species on the site.
REPTILES			
Southern California legless lizard (*Anniella stebbinsi*)	SSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1958, there is no habitat for this species on the site.
California glossy snake (*Arizona elegans occidentalis*)	SSC	Inhabits arid scrub, rocky washes, grasslands, chaparral. with open areas and areas with soil loose enough for easy burrowing (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1946, there is no habitat for this species on the site.
Baja California coachwhip (*Masticophis fuliginosus*)	SSC	In California, found mainly in open areas such as grassland, shrubland, and coastal sand dunes (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1947, there is no habitat for this species on the site.
Coast horned lizard (*Phrynosoma blainvillii*)	SSC MSCP Covered	Inhabits open areas of sandy soil and low vegetation in valleys, foothills and semiarid mountains. Found in grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil. Often found in lowlands along sandy washes with scattered shrubs and along dirt roads. Often found near ant hills feeding on ants (CaliforniaHerps.com 2021).	Not expected. While reported from 1935 within 1 mile of the site, and possibly on site, per the CNDDB, there is currently no habitat for this species on the site.

Table 4 (cont.) **SENSITIVE ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
BIRDS			
Burrowing owl (*Athene cunicularia*)	BCC SSC MSCP Covered	Typically found in grassland or open scrub habitats supporting California ground squirrel (*Otospermophilis beecheyi*) burrows or other burrows or places for nesting (e.g., in piles of riprap or debris).	Low. There are no database records for the species within 1 mile of the site. While a survey report (RECON 2020) for another project across Hollister Street determined that there was moderate potential for the species to occur on that site, no burrowing owl or active burrows were observed during the four surveys conducted in late 2019/early 2020 for that project. No potential burrowing owl burrows were observed on the Palm/Hollister site by Alden in 2021 (the ground squirrel was observed [Appendix B]), and most of the site currently supports a graded pad being used as a construction staging area for materials and heavy equipment. Therefore, there is low potential for the burrowing owl to occur on the Palm/Hollister site.
Western snowy plover (*Charadrius alexandrines nivosus*)	FT SSC MSCP Covered	Beaches, dunes, and salt flats.	Not expected. While reported within 1 mile of the site per the CNDDB, there is no habitat for this species on the site.
Belding's savannah sparrow (*Passerculus sanwichensis beldingi*)	SE MSCP Covered	Coastal marshes dominated by pickleweed (*Salicornia* spp.).	Not expected. While reported within 1 mile of the site per the CNDDB, there is no habitat for this species on the site.
Coastal California gnatcatcher (*Polioptila californica californica*)	FT SSC MSCP Covered	Coastal sage scrub, coastal bluff scrub, and coastal sage-chaparral scrub.	Not expected. While reported within 1 mile of the site per the USFWS, there is no habitat for this species on the site.

Table 4 (cont.) **SENSITIVE ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
BIRDS (cont.)			
Light-footed Ridgway's rail (*Rallus obsoletus levipes*)	FE SE MSCP Covered	Coastal salt marshes, especially those dominated by cordgrass (*Spartina* sp.), but has been known to use brackish and freshwater sites.	Not expected. While reported within 1 mile of the site per the CNDDB and USFWS, there is no habitat for this species on the site.
Least Bell's vireo (*Vireo bellii pusillus*)	FE SE MSCP Covered	Riparian forest, riparian woodland, and riparian scrub.	Not expected. While reported within 1 mile of the site per the CNDDB and USFWS, there is no habitat for this species on the site.
MAMMALS			
Pallid bat (*Atrozous pallidus*)	SSC	Most commonly associated with arid, open scrub or grassland but can also be found in coniferous forests and often occurs on oak- and sycamore-lined floodplain terraces. Open water is often nearby. Roosts in a variety of crevice and cavity locations. In the U.S. is found from Oregon to southern California (Tremor, et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB in 1946 (in Nestor), there is no habitat for this species on site.
Mexican long-tongued bat (*Choeronycteris mexicana*)	SSC	Prefers to roost in dimly lit areas in caves, mines, rock crevices, and buildings. Feeds on fruit, pollen, nectar, and insects. In San Diego County, it is found primarily in fall and winter and in arid habitats from sea level to 500 meters or below in urban and suburban locations along the coast and in the inland valleys (Tremor et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB in 1986 (at "Imperial Beach"), there is no habitat for this species on site.

Table 4 (cont.) **SENSITIVE ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
MAMMALS (cont.)			
Western mastiff bat (*Eumops perotis californicus*)	SSC	Prefers to roost in high, vertical cliffs, rock quarries, and fractured boulders. Feeds on insects. Occurs throughout San Diego County but is strongly associated with its roosting habitat (Tremor et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB (no date; (in the "vicinity of Otay"), there is no habitat for this species on site.

U.S. Fish and Wildlife Service

FT Federal Endangered

FT Federal Threatened

BCC Bird of Conservation Concern—Represents the highest conservation priorities and draws attention to species in need of conservation action.

California Department of Fish and Wildlife

SE State Endangered

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

WL Watch List—Species 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.

City of San Diego

MSCP Covered Covered Species are those species included in the Incidental Take Authorization issued to the City by the USFWS and CDFW

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

No potential Waters of the U.S., Waters of the State, and/or City Wetlands were found during the literature review of current and historic aerial imagery of the site and its surroundings as well as National Wetland Inventory and National Hydrography Dataset mapping for potential wetlands and waterways on or connected to the site. Additionally, no potential jurisdictional features were found on site during the site survey.

5.5.5 Wildlife Corridors

One of the objectives of the MHPA is to delineate core corridors targeted for conservation while acknowledging that limited development may occur (City 1997a). The MHPA on the project site (Figure 3) is depicted on Figure 11 of the MSCP Subarea Plan and included in the MHPA-Southern Area mapped as agriculture (City 1997a), and the site currently supports disturbed and developed land. The site immediately adjacent to the north of the project site (and closer to the Otay River Valley) is an active plant nursery (Terra Bella Nursery, Inc.), which is mapped on the aforementioned Figure 11 as agriculture and developed.

Available aerial imagery of the project site from 1953 through 2016 (Nationwide Environmental Title Research, LLC [NETR] 2021) shows the site as relatively unchanged from its current disturbed and developed condition; although, for many of the years during that period the current disturbed portions of the site were in active agriculture. The project site (and Terra Bella Nursery) is currently designated open space as a result of preserve design serving as resource buffer to Otay River Valley (County of San Diego, City of Chula Vista, and City of San Diego 2016).

The project site is essentially surrounded by existing development and disturbance. The northern boundary of the project site lies adjacent to Terra Bella Nursery and a paved access road to the nursery. Trolley tracks and Hollister Street lie to the west of the site. To the east, the land has been disturbed but is undeveloped. South of the site lies a baseball diamond associated with a school, an undeveloped lot, a mobile home park, and large parking lots associated with a commercial property and the Palm Avenue trolley station (Figure 2). The project site, which is on the outer limits of the mapped open space buffer is not a wildlife corridor; nor is it part of the Otay River Valley corridor. Rather, it is designated as a buffer to that corridor; it does not provide for wildlife movement.

6.0 MSCP COMPLIANCE

6.1 MHPA BOUNDARY LINE ADJUSTMENT

If a project would encroach into the MHPA beyond the allowable development area pursuant to Sections 143.0142 and 131.0250(b) of the Land Development Code and pages 13-15 of the City's Biology Guidelines, an MHPA boundary line adjustment is required. Under the City's MSCP Subarea Plan, an adjustment to the City's MHPA boundary is allowed only if the new MHPA boundary results in an exchange of lands that are functionally equivalent or higher in biological value. A determination of functionally equivalent or higher biological value is based on site-specific information (both quantitative and qualitative) that addresses six boundary adjustment criteria outlined in Section 5.4.3 of the Final MSCP Plan (August 1998).

As noted in Table 1 of this report, 2.2 acres of the 5.9-acre project site, which supports disturbed land, are in the MHPA. The project proponent proposes to develop the entire site; therefore, an MHPA boundary line adjustment is proposed to remove the 2.2 acres of disturbed land from the MHPA on site and preserve higher quality habitat in the MHPA off site on the 9.92-acre Najor parcel (APN 366-031-12) located in the East Elliott preserve area in the City (Figure 4). Mr. Daniel Najor (Seller) entered into a land transaction agreement with Palm Hollister LLC (Buyer) on January 3, 2023 to sell the parcel.

The Najor parcel is entirely within the MHPA and is designated as 75 percent baseline conservation (25% developable). According to SANDAG (2012), the parcel supports coastal scrub and Diegan coastal sage scrub. The National Wetlands Inventory and National Hydrography Dataset show that the parcel supports a riverine feature and stream/river feature, respectively. Database records (USFWS, CNDDB, SanBios) of sensitive species on the parcel include willowy monardella (*Monardella viminea*; Federal and State endangered), red-diamond rattlesnake (*Crotalus ruber*; State species of special concern), prairie falcon (*Falco mexicanus*; State watch list), and coastal California gnatcatcher (*Polioptila californica californica*; Federal threatened, State species of special concern).

Specifically, 2.2 acres within a 25 percent portion of the Najor parcel where development would be allowed (which totals 2.48 acres) would be used for this land exchange. Palm Hollister LLC would acquire the entire 9.92-acre parcel and grant it to the City in fee title, to be managed by the City as MHPA land. Given that only 2.2 acres of the parcel is required for the MHPA boundary line adjustment, Palm Hollister LLC proposes to retain the rights to the remainder of the parcel to potentially use as mitigation or land exchange(s) for other projects in the future.

An equivalency analysis for the proposed MHPA removal and the exchange land is provided below and summarized in Table 5.

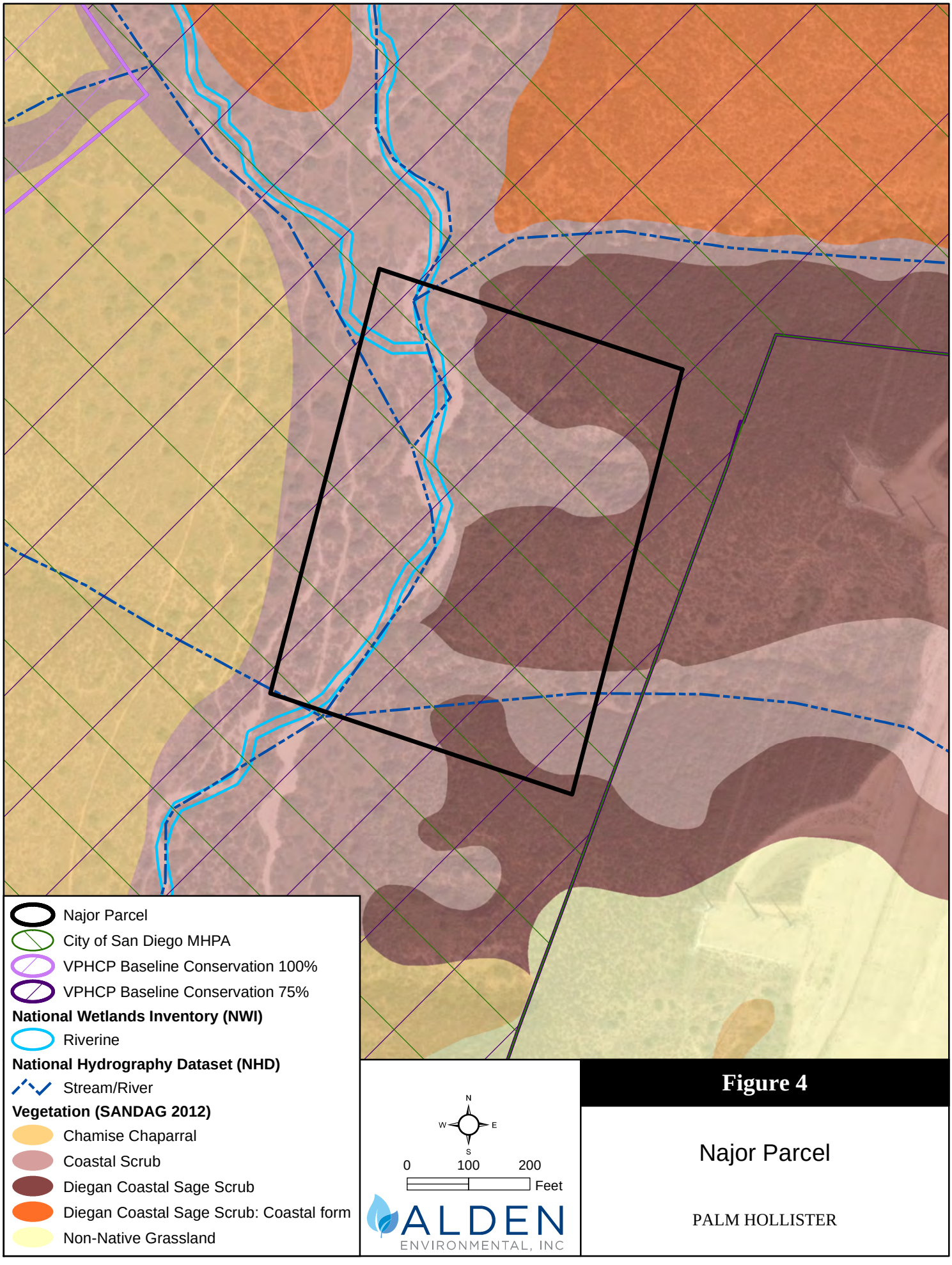

Figure 4

Najor Parcel

PALM HOLLISTER

Table 5 MHPA EXCHANGE (acres)				
HABITAT	**EXISTING MHPA ON PALM/HOLLISTER**	**PROPOSED ENCROACHMENT**	**PROPOSED ADDITION TO THE MHPA[1]**	**NET CHANGE TO MHPA[1]**
Disturbed land (Tier IV)	2.2	2.2	0.0	-2.2
Coastal scrub/Diegan coastal sage scrub	0.0	0.0	2.2	+2.2

[1]The proposed addition and net change to the MHPA includes 2.2 acres of coastal scrub/Diegan coastal sage scrub, which is part of the 2.48 acres that could be developed on the 9.92-acre parcel.

MHPA Boundary Adjustment Criteria/Equivalency Analysis

1. *Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly and sufficiently conserved habitats, as defined in Section 3.4.2 [of the MSCP Plan]).*

The proposed boundary adjustment would result in the preservation of 2.2 acres, which would include no decrease of habitat within the MHPA because that 2.2 acres is within 2.48 acres of land on the Najor parcel, which are allowed to be developed. The project proposes to remove 2.2 acres of Tier IV disturbed land from the MHPA and proposes to add 2.2 acres of Tier II coastal scrub/Diegan coastal sage scrub with greater habitat quality to the MHPA rather than develop it. Therefore, the exchange would improve the conservation, configuration, or status of significantly and sufficiently conserved habitats.

2. *Effects on covered species (i.e., the exchange maintains or increases the conservation of covered species).*

The 2.2 acres of disturbed land to be removed do not support any covered species. The 2.2 acres of land to be conserved on the Najor parcel may support one or more covered species including willowy monardella and coastal California gnatcatcher. Therefore, the exchange has potential to increase the conservation of covered species.

3. *Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves any habitat linkages or wildlife corridors).*

As explained in Section 5.5.5, *Wildlife Corridors*, the project site is not a wildlife corridor, nor is it part of the Otay River Valley corridor. Rather, it is designated as a buffer to that corridor; it does not provide for wildlife movement. The Najor parcel, on the other hand, is part of the East Elliott preserve. The National Wetlands Inventory riverine feature on the parcel provides and natural corridor for wildlife movement north and south through that portion of the preserve, and the surrounding upland habitats provide connectivity to other preserved habitat to the north, south, east, and west. Therefore, the exchange would maintain habitat linkages and opportunities for wildlife movement.

4. *Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection of biological resources).*

Since the Najor parcel is already part of the City's East Elliott preserve and in the MHPA, the exchange would result in similar management efficiency and protection of biological resources.

5. *Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).*

The exchange would not occur on the Palm/Hollister project site, so this adjustment criterion is not applicable. However, the land on the Najor parcel would not be altered; therefore, the topographic and structural diversity and habitat interfaces of the East Elliott preserve would be maintained.

6. *Effects on species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state ESAs).*

The exchange would remove disturbed land that does not support covered or uncovered sensitive species and would replace it with habitat of higher quality (coastal scrub/Diegan coastal sage scrub) that is known to support both covered species (e.g., willowy monardella and coastal California gnatcatcher) and uncovered species (e.g., red-diamond rattlesnake and prairie falcon). Therefore, the exchange would not increase the likelihood that an uncovered species will meet the criteria for listing under either the Federal or State ESAs.

In conclusion, the proposed MHPA boundary adjustment would result in greater biological function and value than maintaining the MHPA on the project site.

6.2 LAND USE ADJACENCY GUIDELINES

Because the project would occur adjacent to the MHPA located off site to the north and northwest (following the MHPA boundary line adjustment), conformance with the adjacency guidelines would be required. Development adjacent to the MHPA must ensure that indirect impacts to the MHPA are minimized. Sections 1.4.2 and 1.4.3 of the City's Subarea Plan outline 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 following addresses the guidelines and how the project complies with them. All of the required MHPA Land Use Adjacency Guidelines measures would become conditions of project approval.

6.2.1 Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

During construction, the project will employ the use, as applicable, of structural and non-structural Best Management Practices (BMPs), Best Available Technology, and sediment catchment devices downstream of paving activities to reduce potential drainage impacts associated with construction. Additionally, the project design complies with the Standard Urban Stormwater Management Plan and Municipal Stormwater Permit criteria of the State Water Resources Control Board and City.

Hardscape associated with the built project would result in runoff, which could significantly impact water quality in the MHPA. However, the project would provide stormwater treatment through two Modular Wetland Systems (WMS) and two underground stormwater cisterns (Figure 3). Stormwater on the site would be directed to the two WMS, which use filters, wetland vegetation, and biological processes to remove contaminants from the water before entering the cisterns. The vegetation used in the WMS are non-invasive wetland associated species, appropriate for the designated filtration uses. The western cistern would have a storage volume of 11,942 cubic feet (cf), and storage volume of the eastern cistern would be 5,933 cf. Each cistern will detain the water and allow it to flow from the site through two outfalls at a regulated rate, equivalent to the pre-project runoff condition. The stormwater outlets (Figure 3) would include energy dissipators to reduce discharge velocities and minimize the potential for erosion, and the project would not result in any increase in off-site discharge of stormwater runoff. Therefore, the project is in conformance with this Land Use Adjacency Guideline. More information regarding stormwater treatment is provided in the Storm Water Quality Management Plan (SWQMP) for the project (Pasco Laret Suiter & Associates 2022).

6.2.2 Toxics

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

The project site is the location of former agricultural use. Therefore, Phase I and Phase II Environmental Site Assessments (ESAs) were conducted (Advantage Environmental Consultants, LLC 2020a, 2020b). The Phase I ESA concluded that there is no evidence of Recognized Environmental Conditions associated with the project site. The current uses of the site and its adjacent properties are not indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products (based on visual observations and regulatory database review) that have adversely impacted the site. The Phase II ESA included soil sampling and an analysis that detected lead, Title 22 metals, and organochlorine concentrations; however, the levels did not exceed their respective residential or commercial screening levels. As such, soil in the areas sampled are not considered to be toxic.

No trash, oil, parking, or other construction/development related material/activities will be located outside approved project impact limits. While there are no specific staging/storage areas identified for construction, they will only be located within the project impact footprint and, as required, will incorporate appropriate BMPs to ensure that there are no indirect effects to the adjacent MHPA. All construction related debris will be removed off site to an approved disposal facility. Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.2.3 Lighting

Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Night lighting will be shielded, as necessary, to prevent light from spilling into the MHPA. Shielding will consist of the installation of fixtures that physically direct light away from the MHPA or landscaping, berms, or other barriers that prevent such light overspill. The lighting used will adhere to the City's Outdoor Lighting Regulations (SDMC §142.0740).
Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.2.4 Noise

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the

MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

The MHPA, which is north of the project site, is already subject to noisy uses such as the trolley and vehicular use of Hollister Street that create noise. The project primarily involves residential housing, which is not an excessively noisy use. The project would also include a bar-b-que pavilion, fire table, turf area incorporating a nature playground, game courts, sofa seating areas, and a pedestrian landscaped walkway along the top of the northern slope connecting the residential buildings to these amenities, which would be situated to take advantage of views of Otay Valley Regional Park to the north. Noise generated from the use of these amenities is not expected to be excessive or long lasting, and there are no sensitive species breeding areas in the adjacent MHPA (the MHPA to the north consists of agricultural and developed land associated with the Terra Bella Nursery). Vehicular access to the project would be from the south and not adjacent to the MHPA. Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.2.5 Barriers

New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

The project will install a six-foot high, chain link fence along the site's northern boundary, which would be adjacent to the MHPA after the boundary line adjustment. Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.2.6 Invasives

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

The project will follow SDMC Landscape Standards (Section 1.3) and not use invasive species in landscaping adjacent to the MHPA, which will prevent their introduction to areas adjacent to the MHPA. The Palm and Hollister Landscape Development Plan prepared by Howard Associates Landscape Architecture was reviewed to confirm that it does not include any invasive species, which will prevent the spread of invasive species to the MHPA. The plant palette is included in Table 6. The palette includes natives and native hybrids along the northern project boundary, adjacent to the MHPA. The palette component areas adjacent to the MHPA include Low-fuel Shrubs and Groundcovers, Low-fuel Keystone Retaining Wall Planting, and Low-fuel Easement Native Groundcovers Adjacent to Future O.V.R.P. Specific non-native species are included in the interior of the project, away from the MHPA and would not pose an invasive threat to the MHPA. Given the lack of invasive species and use of natives/native hybrids along the MHPA boundary, the project is in conformance with this Land Use Adjacency Guideline.

Table 6 PLANT PALETTE	
Low-fuel Shrubs and Groundcovers[1]	
Bahiopsis laciniata	San Diego County sunflower
Baccharis 'Pigeon Point'	coyote brush
Encelia californica	California brittlebrush
Epilobium canum	hummingbird trumpet
Salvia clevelandii	Cleveland sage
Tagetes lemonii	mountain marigold
Low-fuel Keystone Wall Plantings[1]	
Arctostaphylos 'Pacific Mist'	Pacific mist manzanita
Baccharis 'Pigeon Point'	coyote brush
Rosmarinus prostratus	creeping rosemary
Low-fuel Easement Native Groundcovers Adjacent to Future O.V.R.P.[1]	
Arctostaphylos 'Pacific Mist'	Pacific mist manzanita
Artemisia 'Canyon Grey'	trailing sagebrush
Baccharis 'Pigeon Point'	coyote brush
Eriogonum parvifolium	sea cliff buckwheat
Salvia 'bees bliss'	bee's bliss creeping sage
Large Accent Trees	
Platanus racemosa	sycamore
Tipuana tipu	tipu tree
Ulmus p. 'True Green'	Chinese elm
Evergreen Parking Area Trees	
Arbutus 'Marina'	no common name
Geijera parviflora	Australian willow
Metrosideros excelsa	New Zealand Christmas tree
Small, Flowering Accent Trees	
Eriobotrya deflexa	bronze loquat
Jacaranda 'Bonsai Blue'	dwarf jacaranda
Rhaphiolepis 'Majestic Beauty'	Indian hawthorn
Native Slope Trees	
Cercis occidentalis	western redbud
Heteromeles arbutifolia	toyon
Prunus ilicifolia	hollyleaf cherry
Evergreen Theme Trees	
Arecastrum romanzoffianum	queen palm
Hymenosporum flavum	sweetshade
Laurus nobilis	bay laurel
Tristania conferta	Brisbane box
Vines/Espaliers	
Bougainvillea spp.	bougainvillea
Distictis spp.	trumpet vine

Table 6 (cont.) **PLANT PALETTE**	
Ornamental Shrubs	
Aloe spp.	aloe
Aeonium 'sunburst'	no common name
Agave attenuata	foxglove agave
Alyogyne huegellii	blue hibiscus
Anigozanthos spp.	kangaroo paw
Arbutus u. compacta	no common name
Baccharis 'Centennial'	coyote brush
Callistemon 'Little John'	dwarf bottle brush
Feijoa sellowiana	pineapple guava
Lantana spp.	lantana
Ligustrum texanum	waxleaf privet
Phormium spp.	New Zealand flax
Raphiolepis umbellata minor	Indian hawthorn
Tecoma 'Orange Jubilee'	orange bells
Verbena De La Mina	purple verbena
Westringia 'Blue Gem'	coastal rosemary
Groundcover	
Baccharis p. 'Pigeon Point'	coyote brush
Bougainvillea 'Rosenka'	bougainvillea
Lantana 'New Gold'	lantana
Lomandra 'Breeze'	breeze lomandra
Turf	
dwarf marathon fescue sod	

[1]Species along the northern boundary, adjacent to the MHPA

6.2.7 Brush Management

New development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the pad and outside of the MHPA. Zone 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than is currently required by the City's regulations. Initial thinning of woody vegetation shall not exceed 50 percent coverage of the existing vegetation prior to implementation of Brush Management activities. Additional thinning and pruning shall be done consistent with City standards to obtain minimum vertical and horizontal clearances and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party. For existing and approved projects, the brush management zones, standards and locations, and clearing techniques will not change from those required under existing regulations.

All brush management for the project incorporates Zone 1 brush management on site and on the development pad (Plan Sheet LO03). The project includes Alternative Compliance Brush Management Zone 1, and no Zone 2 brush management is required. Brush management would be located outside of the MHPA after the proposed boundary line adjustment. Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.2.8 Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

The project incorporates all slopes on the site and within the development footprint. Therefore, the project is in conformance with this Land Use Adjacency Guideline.

6.3 GENERAL PLANNING POLICIES AND DESIGN GUIDELINES

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. Due to the boundary line adjustment, there would be no MHPA on site. The site would still be adjacent to the MHPA where it occurs on the site immediately to the north.

Roads and Utilities – Construction and Maintenance Policies

This section of the Subarea Plan includes eight guidelines/policies. Each is summarized below along with an explanation describing how the project complies with the guidelines/policies where it occurs adjacent to the MHPA.

1. *All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA.*

   There are no utility lines proposed off site in the MHPA.

2. *All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located, and constructed to minimize environmental impacts. If avoidance is infeasible, mitigation would be required.*

   No new development for utilities and facilities would occur within or crossing the MHPA.

3. *Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable.*

   Areas of temporary disturbance for construction would occur on the site, which does not support existing habitat.

4. *Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage.*

The project site is not in a wildlife corridor.

5. *Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, essential collector streets, and necessary maintenance/emergency access roads.*

   The project does not include roadway construction.

6. *Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible, and if a road crosses the MHPA, it should provide for fully-functional wildlife movement capability.*

   The project does not include roadway construction.

7. *Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.*

   The project does not include roadway construction.

8. *Existing roads and utility lines are usually considered a compatible use in the MHPA.*

   The project does not involve use of any roads or utility lines existing in the MHPA.

Fencing, Lighting, and Signage

This section of the Subarea Plan includes three guidelines/policies. Each is summarized below along with an explanation as to how the project complies where it occurs adjacent to the MHPA.

1. Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA.

   There are no incompatible land uses adjacent to the MHPA associated with the project. However, the project will install a six-foot high, chain link fence along the site's northern boundary separating the site from the adjacent MHPA.

2. Lighting shall be designed to avoid intrusion in the MHPA.

   Lighting adjacent to the off-site MHPA will be directed away/shielded and will be consistent with City Outdoor Lighting Regulations per LDC Section 142.0740.

3. Signage will be limited to access, litter control, and educational purposes.

   Signage will be installed on the project's side of the project site's northern boundary fencing to note that entry to the MHPA is prohibited.

Materials Storage

Storage of materials (e.g., hazardous or toxic chemicals, equipment, etc.) shall not be located within the MHPA, and proper storage of such materials is required per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.

No trash, oil, parking, or other construction/development related material/activities will be located outside approved construction limits. No staging/storage areas for equipment and materials will be located adjacent to the MHPA. All construction related debris will be removed off site to an approved disposal facility.

6.4 GENERAL MANAGEMENT DIRECTIVES

The following summarized, General Management Directives for all areas of the City's MSCP Subarea Plan are applicable to the project. Those directives not applicable include Invasives Exotics Control and Removal (except Invasives; see Section 6.2.6, *Invasives*) and Flood Control (since there are no flood control channels on site).

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

   The mitigation measures in Section 8.0, *Mitigation Measures*, of this report have been formulated to satisfy the requirements of the City's MSCP Subarea Plan, Biology Guidelines, and ESL Regulations.

2. Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City.

   No restoration or revegetation in the MHPA is proposed for the project.

3. Public Access, Trails, and Recreation. This directive includes requirements for trail signage, type, location, design, and use.

   There are no trails associated with the project.

4. Litter/Trash and Materials Storage. This directive includes requirements for trash removal and permanent materials storage in the MHPA.

   Trash and other construction related materials will be kept within approved construction limits, and no storage areas will be located adjacent to the MHPA. All construction related debris will be removed off site to an approved disposal facility. There would be no permanent storage of any kind adjacent to the MHPA (KLR Planning 2022).

6.5 CONDITIONS AND ASMDs FOR MSCP COVERED SPECIES

There are no MSCP Covered Species with moderate or high potential to occur on the project site (Tables 2 through 4). Therefore, no conditions for Covered Species or Area Specific Management Directives for Covered Species apply.

7.0 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 7.1 of this report.

7.1 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.

7.1.1 Direct Impacts to Vegetation Communities

The project would develop the entire 5.9-acres site, and the direct impacts would be to 5.6 acres of disturbed land and 0.3 acre of developed. Since disturbed land and developed are not sensitive, the impacts would be less than significant, and no mitigation is required.

7.1.2 Direct Impacts to Sensitive Plant Species

No impacts to sensitive plant species are anticipated since no sensitive plant species were observed, and none is expected to occur (Tables 2 and 3).

7.1.3 Direct Impacts to Sensitive Animal Species

No sensitive animal species were observed or are expected to occur (refer to Section 5.5.3 and Table 4). Therefore, impacts to sensitive animal species are not anticipated.

7.1.4 Direct Impacts to Waters of the U.S., Waters of the State, and City Wetlands

No impacts to potential Waters of the U.S., Waters of the State, and/or City Wetlands would occur as none is present. As such, the project does not require agency permitting or City Wetland deviation findings.

7.1.5 Direct Impacts to Wildlife Corridors

The project site is not a wildlife corridor nor is it part of the Otay River Valley corridor. Therefore, the project would not impact wildlife movement.

7.2 INDIRECT IMPACTS

Like lighting or noise, which are indirect impacts addressed by the Land Use Adjacency Guidelines, indirect impacts of a project may also include the secondary effects of fugitive dust.

Fugitive dust produced by construction can disperse onto nearby vegetation. A continual cover of dust may reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals that are dependent on these plants (e.g., seed-eating rodents). Fugitive dust also may make plants unsuitable as habitat for insects and birds.

Construction of the project will adhere to applicable construction dust control measures prescribed by the City. These measures include, for example, reduced driving speeds on unpaved roads and regular watering of dirt surfaces. Potential impacts from fugitive dust would be less than significant and, therefore, would not require mitigation.

7.3 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. The project would comply with the City's Subarea Plan by conforming to the MHPA Land Use Adjacency Guidelines to protect the off-site MHPA from potential indirect effects and by proposing an MHPA boundary line adjustment that would result in greater biological function and value to the MHPA than maintaining the MHPA on the project site.

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, and no mitigation for cumulative impacts would be required.

8.0 MITIGATION MEASURES

The project would not have significant impacts on sensitive vegetation as none is present. The project would not have significant impacts on sensitive plant or animal species as none is present or are not expected to occur (one [burrowing owl] has low potential to occur). There would be no impacts to potential jurisdictional areas as none is present.

Additionally, the project would comply with the MHPA Land Use Adjacency Guidelines to avoid/minimize indirect effects on the MHPA and would, through the proposed MHPA boundary line adjustment, result in greater biological function and value to the MHPA than maintaining the MHPA on the project site. Therefore, the project would not have significant effects on biological resources, and no mitigation is required.

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10.0 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.

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

Appendix A
PLANT SPECIES OBSERVED

FAMILY	SCIENTIFIC NAME	COMMON NAME	HABITAT[1]
ANGIOSPERMS – MONOCOTS			
Aizoaceae	*Carpobrotus edulus*[2]	Hottentot's fig	DL, DEV
	Mesembryanthemum crystallinum[2]	crystalline iceplant	DL
Arecaceae	*Syagrus romanzoffiana*[2]	queen palm	DL, DEV
	Washingtonia robusta[2]	Mexican fan palm	DL
Asphodelaceae	*Aloe maculata*[2]	Aloe	DEV
Cupressaceae	*Juniperus chinensis*[2]	Chinese juniper	DEV
Pinaceae	*Pinus* sp.[2]	ornamental pine	DL, DEV
Poaceae	*Avena fatua*[2]	wild oats	DL
	Bromus diandrus[2]	common ripgut grass	DL
	Bromus madritensis ssp. *rubens*[2]	foxtail chess	DL
	Hordeum murinum[2]	barley	DL
	Stipa pulchra	purple needlegrass	DL
ANGIOSPERMS – DICOTS			
Apiaceae	*Foeniculum vulgare*[2]	fennel	DL
Anacardiaceae	*Malosma laurina*	laurel sumac	DL
	Schinus molle[2]	California pepper	DEV
	Schinus terebinthifolius[2]	Brazilian pepper tree	DL, DEV
Asteraceae	*Baccharis sarothroides*	broom baccharis	DL
	Centaurea melitensis[2]	star thistle	DL
	Dittrichia graveolens[2]	stinkwort	DL
	Glebionis coronaria[2]	garland daisy	DL
	Hedypnois cretica[2]	Crete hedypnois	DL
	Hypochaeris glabra[2]	smooth cat's-ear	DL
	Matricaria discoidea[2]	pineapple weed	DL
	Xanthium strumarium[2]	cocklebur	DL
Brassicaceae	*Brassica nigra*[2]	black mustard	DL
	Hirschfeldia incana[2]	perennial mustard	DL
	Raphanus raphanistrum[2]	wild radish	DL
	Salsola tragus[2]	Russian thistle	DL
Fabaceae	*Acmispon glaber*	deer weed	DL
	Melilotus indica[2]	Indian sweet clover	DL
Geraniaceae	*Erodium sp*[2]	filaree	DL
Lamiaceae	*Marrubium vulgare*[2]	horehound	DL
Magnoliaceae	*Magnolia grandiflora*[2]	southern magnolia	DEV
Malvaceae	*Malva parviflora*[2]	cheeseweed	DL
Polygonaceae	*Eriogonum fasciculatum*	California buckwheat	DL
Rutaceae	*Citrus limon*[2]	lemon tree	DEV
Solanaceae	*Nicotiana glauca*[2]	Tree tobacco	DL

[1]Habitat acronyms: DL=disturbed land, DEV=developed
[2]Non-native species.

Appendix B
ANIMAL SPECIES OBSERVED

SCIENTIFIC NAME	COMMON NAME
INVERTEBRATES	
Pogonomyrmex barbatus	harvester ant
VERTEBRATES	
Birds	
Buteo jamaicensis	red-tailed hawk (flying overhead)
Carpodacus mexicanus	house finch
Larus californicus	California gull (flying overhead)
Melospiza melodia	song sparrow
Mimus polyglottus	northern mockingbird
Zenaida macroura	mourning dove
Mammals	
Spermophilus beecheyi	California ground squirrel
Sylvilagus audubonii	Desert cottontail

Appendix C
REPRESENTATIVE PHOTOGRAPHS

REPRESENTATIVE PHOTOGRAPHS

Photo Point 1. 04/22/21

Photo Point 2. 04/22/21

Photo Point 3. 04/22/21

Photo Point 4. 04/22/21

Photo Point 5. 04/22/21

Photo Point 6. 04/22/21

Photo Point 7. 04/22/21

Photo Point 8. 04/22/21

Photo Point 9. 04/22/21

Photo Point 10. 04/22/21

Photo Point 11. 04/22/21

Photo Point 12. 04/22/21

Photo Point 13. 04/22/21

Photo Point 14. 04/22/21

Photo Point 15. 04/22/21

Photo Point 16. 04/22/21

Photo Point 17. 04/22/21

Photo Point 18. 04/22/21

Photo Point 19. 04/22/21

Photo Point 20. 04/22/21

Photo Point 21. 04/22/21

Photo Point 22. 04/22/21

Photo Point 23. 04/22/21

Photo Point 24. 04/22/21

Appendix D NARROW ENDEMIC AND VERNAL POOL PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
NARROW ENDEMIC[1] SPECIES				
San Diego thornmint (*Acanthomintha ilicifolia*)	FT SE CNPS Rank 1B.1	Occurs on clay lenses in grassy openings in chaparral or sage scrub. Prefers friable or broken, clay soils. Range limited to coastal areas of San Diego County and Baja California, Mexico.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within one mile of the site.
Shaw's agave (*Agave shawii*)	CNPS Rank 2B.1	Coastal sage scrub and coastal bluff scrub. Range limited to coastal areas of San Diego County and Baja California, Mexico.	September to May	Not expected. No habitat is present on site. Not reported to the CNDDB within one mile of the site.
San Diego ambrosia (*Ambrosia pumila*)	FE CNPS Rank 1B.1	Found (often) in disturbed areas within sandy loam or clay soils in chaparral, coastal sage scrub and grasslands. Range includes San Diego and Riverside counties and Baja California, Mexico.	April to October	Not expected. Habitat is not present on site. Not reported to the CNDDB or USFWS within one mile of the site.
Aphanisma (*Aphanisma blitoides*)	CNPS Rank 1B.2	Occurs in sandy areas along the coast. Range includes islands off the southern California coast from San Onofre to Imperial Beach in San Diego County.	April to May	Not expected. No habitat is present on site. Not reported to the CNDDB within one mile of the site.
Coastal dunes milk vetch (*Astragalus tener* var. *titi*)	FE SE CNPS Rank 1B.1	Occurs in sandy places along the coast, including coastal dunes.	March to May	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Encinitas baccharis (*Baccharis vanessae*)	FT SE CNPS Rank 1B.1	Occurs on sandstone soils in chaparral, known from the Encinitas area.	August to November	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Thread-leaved brodiaea (*Brodiaea filifolia*)	FT SE CNPS Rank 1B.1	Clay soils in vernally moist grasslands and on vernal pool peripheries.	March to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

Appendix D (cont.)
NARROW ENDEMIC AND VERNAL POOL PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR

SPECIES	SENSITIVITY[1]	HABITAT(S)/DISTRIBUTION	BLOOM PERIOD	POTENTIAL TO OCCUR
NARROW ENDEMIC[1] SPECIES (continued)				
Short-leaved dudleya (*Dudleya blochmaniae* ssp. *brevifolia*)	SE CNPS Rank 1B.1	Occurs on Torrey sandstone soils in chaparral and coastal scrub.	April	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.
Variegated dudleya (*Dudleya variegata*)	CNPS Rank 1B.2	Occurs on clay soil in chaparral, coastal sage scrub, grasslands and near vernal pools.	May to June	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.
Otay tarplant (*Deinandra conjugens*)	FT SE CNPS Rank 1B.1	Occurs on clay soils in coastal scrub and valley and foothill grasslands in southern San Diego County.	(April) May to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Snake cholla (*Opuntia parryi* var. *serpentina*)	CNPS Rank 1B.1	Chaparral and coastal scrub in San Diego County and Baja California, Mexico.	April to May	Not expected. No habitat is present on site. Not reported to the CNDDB within 1 mile of the site.
VERNAL POOL SPECIES				
San Diego button-celery (*Eryngium aristulatum* var. *parishii*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Mesic coastal scrub, valley and foothill grassland, and vernal pool habitats in southern California and Baja California, Mexico.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Spreading navarretia (*Navarretia fossalis*)	FT CNPS Rank 1B.1 VPHCP Covered	Occurs in chenopod scrub, marshes and swamps and vernal pools.	April to June	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Orcutt grass (*Orcuttia californica*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Vernal pools in southern California and Baja California, Mexico.	April to August	Not expected. No vernal pool habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

Appendix D (cont.) **NARROW ENDEMIC AND VP PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
VERNAL POOL SPECIES (continued)				
Orcutt grass (*Orcuttia californica*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Vernal pools in southern California and Baja California, Mexico.	April to August	Not expected. No vernal pool habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
San Diego mesa mint (*Pogogyne abramsii*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Occurs in vernal pools in San Diego County.	March to July	Not expected. No habitat is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.
Otay mesa mint (*Pogogyne nudiuscula*)	FE SE CNPS Rank 1B.1 VPHCP Covered	Occurs in vernal pools in San Diego County and Baja California, Mexico.	May to July	Not expected. No habitat for this species is present on site. Not reported to the CNDDB or USFWS within 1 mile of the site.

[1]**Federal**
FE – Federal listed endangered
FT – Federal listed threatened

State
SE – State listed endangered

CNPS (California Native Plant Society) Rare Plant Rank
1B – Rare, threatened, or endangered in California and elsewhere
.1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
.2 – Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat

City of San Diego
Narrow Endemic - Some native species with restricted geographic distributions, soil affinities, and/or habitats.

VPHCP Covered - The Vernal Pool Habitat Conservation Plan was developed using the requirements of a Habitat Conservation Plan under Section 10(a)(1)(B) of the federal Endangered Species Act as the basis for take authorization for the seven covered vernal pools species (i.e., Vernal Pool Covered Species).

Appendix E SPECIAL STATUS PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR				
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**BLOOM PERIOD**	**POTENTIAL TO OCCUR**
Singlewhorl burrobrush (*Ambrosia monogyra*)	CNPS Rank 2B.2	Chaparral and Sonoran desert scrub with sandy soils. In California, found in Riverside, San Bernardino, and San Diego counties.	August to November	Not expected. While reported from 1936 within 1 mile of the site, and possibly on site, per the CNDDB, there is currently no habitat for this species on the site.
San Diego sagewort (*Artemisia palmeri*)	CNPS Rank 4.2	Stream courses, often within coastal sage scrub and southern mixed chaparral. Coastal San Diego County and Baja California, Mexico.	(February) May to September	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Golden-spined cereus (*Bergerocactus emoryi*)	CNPS Rank 2B.2	Sandy soils and dry bluffs along the coast associated with maritime succulent scrub. Coastal San Diego County; Baja California, Mexico; San Clemente and Catalina islands.	May to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*)	CNPS Rank 1B.1	Dry, stony places associated with coastal scrub or chaparral near the coast. Near the coast from San Luis Obispo County south to northern Baja California, Mexico.	April to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
San Diego barrel cactus (*Ferocactus viridescens*)	CNPS Rank 2B.1 MSCP Covered	Diegan coastal sage scrub hillsides, often at the crest of slopes and growing among cobbles. Occasionally found on vernal pool periphery and mima mound topography in Otay Mesa. San Diego County and Baja California, Mexico.	May to June	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Beach goldenaster (*Heterotheca sessiliflora* ssp. *sessiliflora*)	CNPS Rank 1B.1	Chaparral, coastal dunes, and coastal scrub. San Diego County and Baja California, Mexico.	March to December	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*)	CNPS Rank 1B.2	Chaparral and coastal scrub (often in disturbed, sandy areas). Orange and San Diego counties; Baja California, Mexico; San Clemente and Santa Catalina islands.	April to November	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.

Appendix E (cont.)
SPECIAL STATUS PLANT SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR

SPECIES	SENSITIVITY[1]	HABITAT(S)/DISTRIBUTION	BLOOM PERIOD	POTENTIAL TO OCCUR
San Diego marsh-elder (*Iva hayesiana*)	CNPS Rank 2B.2	Intermittent streambed with an open riparian canopy. Often sandy alluvial embankments with cobbles. San Diego County and Baja California, Mexico.	April to October	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.
Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)	CNPS Rank 4.3	Openings in chaparral and coastal scrub scrub. Southwestern California and the Channel Islands.	January to July	Not expected. Reported within 1 mile of per the CNDDB; however, there is no habitat for this species on site.

[1]**CNPS (California Native Plant Society) Rare Plant Rank**
1B – Rare, threatened, or endangered in California and elsewhere
2B – Rare, threatened, or endangered in California but more common elsewhere
3 – More information is needed – a review list
4 – Limited distribution – a watch list
.1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
.2 – Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat)
.3 – Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)
City
MSCP Covered - Species for which the City has take authorization under its MSCP Subarea Plan.

Appendix F SPECIAL STATUS ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
INVERTEBRATES			
Quino checkerspot butterfly (*Euphydryas editha quino*)	FE	Potential habitat includes vegetation communities with areas of low-growing and sparse vegetation including open stands of sage scrub and chaparral, adjacent open meadows, old foot trails, and dirt roads. Primary larval host plant in San Diego at low elevations is dwarf plaintain (*Plantago erecta*).	Not expected. While reported within 1 mile of the site per the USFWS, there is no habitat for this species on the site.
REPTILES			
Southern California legless lizard (*Anniella stebbinsi*)	SSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1958, there is no habitat for this species on the site.
California glossy snake (*Arizona elegans occidentalis*)	SSC	Inhabits arid scrub, rocky washes, grasslands, chaparral. with open areas and areas with soil loose enough for easy burrowing (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1946, there is no habitat for this species on the site.
Baja California coachwhip (*Masticophis fuliginosus*)	SSC	In California, found mainly in open areas such as grassland, shrubland, and coastal sand dunes (CaliforniaHerps.com 2021).	Not expected. While reported within 1 mile of the site per the CNDDB in 1947, there is no habitat for this species on the site.
Coast horned lizard (*Phrynosoma blainvillii*)	SSC MSCP Covered	Inhabits open areas of sandy soil and low vegetation in valleys, foothills and semiarid mountains. Found in grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil. Often found in lowlands along sandy washes with scattered shrubs and along dirt roads. Often found near ant hills feeding on ants (CaliforniaHerps.com 2021).	Not expected. While reported from 1935 within 1 mile of the site, and possibly on site, per the CNDDB, there is currently no habitat for this species on the site.
BIRDS			
Western snowy plover (*Charadrius alexandrines nivosus*)	FT SSC MSCP Covered	Beaches, dunes, and salt flats.	Not expected. While reported within 1 mile of the site per the CNDDB, there is no habitat for this species on the site.
Belding's savannah sparrow (*Passerculus sanwichensis beldingi*)	SE MSCP Covered	Coastal marshes dominated by pickleweed (*Salicornia* spp.).	Not expected. While reported within 1 mile of the site per the CNDDB, there is no habitat for this species on the site.
Coastal California gnatcatcher (*Polioptila californica californica*)	FT SSC MSCP Covered	Coastal sage scrub, coastal bluff scrub, and coastal sage-chaparral scrub.	Not expected. While reported within 1 mile of the site per the USFWS, there is no habitat for this species on the site.
Light-footed Ridgway's rail (*Rallus obsoletus levipes*)	FE SE MSCP Covered	Coastal salt marshes, especially those dominated by cordgrass (*Spartina* sp.), but has been known to use brackish and freshwater sites.	Not expected. While reported within 1 mile of the site per the CNDDB and USFWS, there is no habitat for this species on the site.

Appendix F (cont.) **SPECIAL STATUS ANIMAL SPECIES NOT DETECTED AND THEIR POTENTIAL TO OCCUR**			
SPECIES	**SENSITIVITY[1]**	**HABITAT(S)/DISTRIBUTION**	**POTENTIAL TO OCCUR**
BIRDS (cont.)			
Least Bell's vireo (*Vireo bellii pusillus*)	FE SE MSCP Covered	Riparian forest, riparian woodland, and riparian scrub.	Not expected. While reported within 1 mile of the site per the CNDDB and USFWS, there is no habitat for this species on the site.
MAMMALS			
Pallid bat (*Atrozous pallidus*)	SSC	Most commonly associated with arid, open scrub or grassland but can also be found in coniferous forests and often occurs on oak- and sycamore-lined floodplain terraces. Open water is often nearby. Roosts in a variety of crevice and cavity locations. In the U.S. is found from Oregon to southern California (Tremor, et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB in 1946 (in Nestor), there is no habitat for this species on site.
Mexican long-tongued bat (*Choeronycteris mexicana*)	SSC	Prefers to roost in dimly lit areas in caves, mines, rock crevices, and buildings. Feeds on fruit, pollen, nectar, and insects. In San Diego County, it is found primarily in fall and winter and in arid habitats from sea level to 500 meters or below in urban and suburban locations along the coast and in the inland valleys (Tremor et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB in 1986 (at "Imperial Beach"), there is no habitat for this species on site.
Western mastiff bat (*Eumops perotis californicus*)	SSC	Prefers to roost in high, vertical cliffs, rock quarries, and fractured boulders. Feeds on insects. Occurs throughout San Diego County but is strongly associated with its roosting habitat (Tremor et al. 2017).	Not expected. While reported within 1 mile of the site per the CNDDB (no date; (in the "vicinity of Otay"), there is no habitat for this species on site.

U.S. Fish and Wildlife Service

FT Federal Endangered

FT Federal Threatened

California Department of Fish and Wildlife

SE State Endangered

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

WL Watch List—Species 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.

City of San Diego

MSCP Covered Covered Species are those species included in the Incidental Take Authorization issued to the City by the USFWS and CDFW

References

CaliforniaHerps.com. 2021. http://www.californiaherps.com/index.html

Tremor, Scott; Drew Stokes; Wayne Spencer; Jay Diffendorfer; Howard Thomas; Susan Chivers; and Philip Unitt, editors. *San Diego County Mammal Atlas. Proceedings of the San Diego Society of Natural History*. August 1.