RECON

An Employee-Owned Company

August 26, 2020

Mr. Olivier Andreu
All Right Storage LP
11300 Sorrento Valley Road #250
San Diego, CA 92121

Reference: Biological Survey for the All Right Self-Storage Project, Santee, California
(RECON Number 9603)

Dear Mr. Andreu:

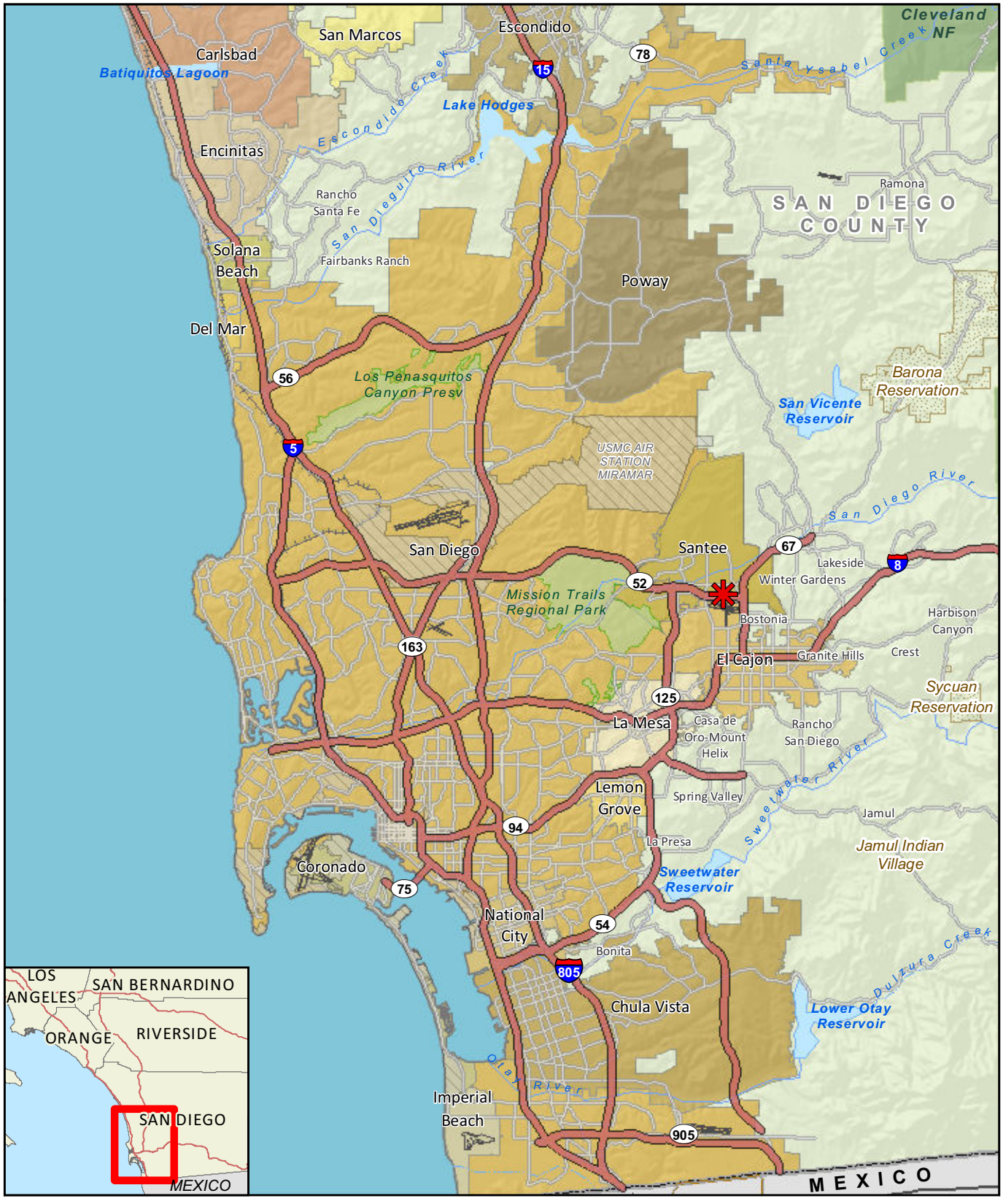
This letter summarizes the background, methods, and results of the biological resources survey for the All Right Self-Storage Project (project), located at 8708 Cottonwood Avenue, north of State Route 52 in the city of Santee, California (Figure 1).

1.0 Introduction

The project area is in an unsectioned portion of the El Cajon Rancho land grant, on the U.S. Geological Survey (USGS) 7.5-minute topographic map, El Cajon quadrangle (USGS 1975; Figure 2). The project occupies all of Assessor's Parcel Number 384-370-25-00, equaling approximately 3.0 acres (Figure 3). The project proposes to construct a 148,458-square-foot (sf) self-storage facility. The project would be developed in two phases. Phase I would construct a three-story, 78,080 sf, mechanically air-conditioned self-storage structure with an incidental office (Building A); a one-story, 4,413 sf self-storage structure (Building B); and a one-story, 5,120 sf self-storage structure with an 800 sf private garage and a 1,130 sf caretaker's living unit as the second story (Building C). Phase I would also introduce 26 on-site parking spaces, along with 57 recreational vehicle parking spaces for rent or for rental trucks for moving purposes. Phase II would remove the recreational vehicle parking spaces for rent and construct a one-story, 8,309 sf self-storage structure (Building D), and a three-story, 50,606 sf, mechanically air-conditioned self-storage structure (Building E). Phase II would also add an additional three parking spaces, resulting in a total of 29 on-site parking spaces.

2.0 Surrounding Land Uses and Setting

The project is located on the floodplain south of the San Diego River. The topography of the project area is relatively flat with an average elevation of 350 feet above mean sea level. Based on historic aerial photographs, a portion of the project site was occupied by a residence in 1953. By 1964, the parcel had been developed as a portion of a mobile home park that continued in this configuration until 2010, by which time all of the homes had been removed. The 2010 photograph also shows the same basic condition as is currently found on the project site (Nationwide Environmental Title Research LLC 2020). As shown on Figure 3, land uses surrounding the project area include single-family residences to the north, single-family residences and a commercial structure to the east, State Route 52 to the south, and a business park with commercial/industrial uses to the west.



Project Location

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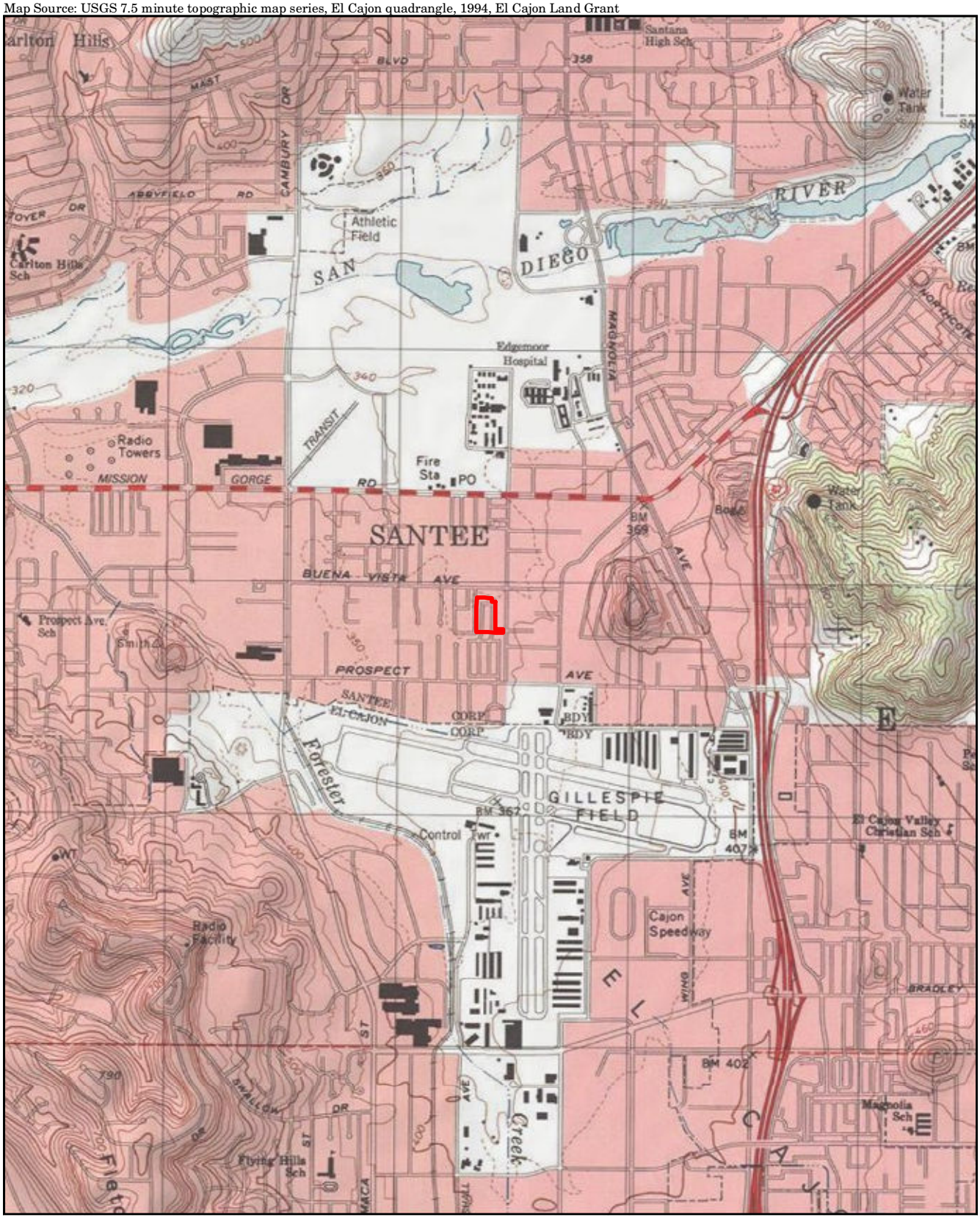
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, El Cajon quadrangle, 1994, El Cajon Land Grant



Project Area

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FIGURE 2
Project Area on USGS Map

Image Source: Nearmap (flown January 2020)

Project Area

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FIGURE 3

Project Area on Aerial Photograph

3.0 Survey Methods

RECON biologist Kevin Israel conducted a general biological survey for the proposed project within the entire project area and a 100-foot buffer by site from the project area on January 29, 2020. Vegetation communities were mapped on a 1-inch-equals-300-feet aerial photograph flown in 2010. All plant species observed on-site were noted and plants that could not be identified in the field were identified later using taxonomic keys. The survey also included a directed search for sensitive plants that would have been apparent during the time of the survey. A general wildlife survey was conducted during the site visit. Animal species observed directly or detected from calls, tracks, scat, nests, or other sign were noted. Limitations to the compilation of comprehensive plant and animal species lists were imposed by seasonal factors, the survey was conducted in the winter, and species that grow or occur in spring or summer may not have been apparent. A survey was also conducted to identify wetlands or drainages considered jurisdictional by the U.S. Army Corps of Engineers (USACE) and the California Department of Fish and Wildlife (CDFW).

Floral nomenclature for common plants follows Jepson Flora Project (2020) and for sensitive plants California Native Plant Society (CNPS; 2020). Vegetation community classifications follow Holland (1986) as modified by Oberbauer (2008). Zoological nomenclature for birds is in accordance with the American Ornithological Society checklist (Chesser et al. 2019) and Unitt (2004); for mammals with Baker et al. (2003) and Hall (1981); for amphibians and reptiles with Crother et al. (2017); and for invertebrates with Evans (2008). Determination of the potential occurrence for listed, sensitive, or noteworthy species is based upon known ranges and habitat preferences for the species (Jennings and Hayes 1994; Unitt 2004; CNPS 2020), and species occurrence records from the California Natural Diversity Database (CNDDB; State of California 2020a, 2020b, 2020c, 2020d, and 2020e), and species occurrence records from other sites in the vicinity of the survey area.

4.0 Survey Results

4.1 Vegetation Communities/Land Cover Types

One vegetation community/land cover type, urban/developed land, was mapped within the approximately 7.7-acre survey area (Figure 4). Of the 28 plant species observed, five are considered native to California and 23 are considered non-native species. A complete list of plant species observed during the survey can be found in Attachment 1.

The project area consists entirely of pavement and ornamental vegetation with no native habitat present. The majority of non-paved areas consist primarily of non-native grasses with occasional trees, primarily Mexican fan palm (*Washingtonia robusta*). Other prominent species include lemon (*Citrus limon*), acacia (*Acacia* sp.), and weeping bottlebrush (*Melaleuca viminalis*), and broom baccharis (*Baccharis sarothroides*). Several gum trees (*Eucalyptus* sp.), and a western sycamore (*Platanus racemosa*) are adjacent to the southern project boundary.

4.2 Wildlife

A list of the 10 wildlife species detected within the survey area can be found in Attachment 2. Common wildlife species include honey bee (*Apis mellifera*), western fence lizard (*Sceloporus occidentalis*), red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaida macroura marginella*), American crow (*Corvus brachyrhynchos hesperis*), northern mockingbird (*Mimus polyglottos polyglottos*), California towhee (*Melozone crissalis*), desert cottontail (*Sylvilagus audubonii*), and domestic dog (*Canis familiaris*). A single osprey (*Pandion haliaetus carolinensis*), a CDFW Watch List species, was observed flying overhead; however, no osprey nesting activity is anticipated to occur within the project area due to a lack of aquatic habitat within or adjacent to it.

4.3 Wetland and Non-wetland Jurisdictional Waters

No drainages, wetlands, or waters were observed within the project area nor are any anticipated to occur.

Image Source: Nearmap (flown January 2020)

FIGURE 4
Existing Biological Resources

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4.4 Survey Conclusions

As described in Section 4.1 above, the biological survey conducted in January 2020 determined that the project area consists entirely of pavement and ornamental vegetation with no native habitat present, and the entire project site and surrounding survey area was mapped as urban/developed land. Therefore, project site conditions do not provide any potential habitat that would support sensitive species, and additional surveys are not recommended.

5.0 Sensitive Biological Resources

5.1 Sensitivity Criteria/Regulatory Setting

For purposes of this report, species will be considered sensitive if they are: (1) listed by state or federal agencies as threatened or endangered or are proposed for listing; (2) given a California Rare Plant Rank (CRPR) 1B (considered endangered throughout its range); CRPR 2 (considered endangered in California but more common elsewhere), CRPR 3 (more information about the plant's distribution and rarity needed) or CRPR 4 (plants of limited distribution) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (2020); (3) considered rare, endangered, or threatened by the CNDDB (State of California 2020b); or (4) identified by another recognized conservation or scientific group as being depleted, potentially depleted, declining, rare, critical, endemic, endangered, or threatened. Sensitive vegetation communities are those identified by the CNDDB (State of California 2020e).

State Regulations

Under Section 3503 of the California Fish and Game Code (CFGC), 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. Section 3503.3 of the CFGC prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs (State of California 1991).

Federal Regulations

The Migratory Bird Treaty Act of 1918 (MBTA) was established to provide protection to the breeding activities of migratory birds throughout the U.S. The MBTA protects migratory birds and their breeding activities from take and harassment. Pursuant to U.S. Department of the Interior Memorandum M-37050, the federal MBTA is not currently interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

San Diego County and City of Santee Regulations

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation program developed by land use jurisdictions and special agencies in southwestern San Diego County, including the City of Santee (City). The MSCP was developed under the Natural Community Conservation Plan (NCCP) Process and Conservation Guidelines approved by the CDFW in November of 1993, following passage of the California Natural Community Conservation Planning Act of 1991. The City is currently participating in the MSCP and has prepared an administrative draft MSCP Subarea Plan (City of Santee 2002).

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by resource and conservation agencies.

Jurisdictional Resources

All wetland areas are considered sensitive. USACE regulates the discharge of dredged or fill material into waters of the U.S. (wetland and non-wetland jurisdictional waters of the U.S.) according to Section 404 of the Clean Water Act. Section 401 of the Clean Water Act requires that a water quality certificate be obtained in conjunction with any federal permits. This certificate is processed through the Regional Water Quality Control Board (RWQCB). CDFW regulates all changes to the natural flow or bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. Riparian habitat and isolated waters, regardless of USACE jurisdiction, are also regulated by CDFW.

5.2 Vegetation Communities

The only vegetation community present within the project area, urban/developed land (see Figure 4), is not considered sensitive.

5.3 Sensitive Plant Species

No sensitive plant species were observed within the project area nor are any sensitive plants anticipated to occur. The site was previously developed and still maintains remnants of the old concrete foundations through much of the site. In addition, the site is surrounded by development on all sides. The site no longer supports suitable habitat to support sensitive plant species.

5.4 Sensitive Wildlife Species

Tree roosting bats may utilize fan palms; however, there is a low potential for occurrence and bats have the ability to vacate when trees are disturbed. No other sensitive wildlife species were observed within the project area nor have the potential to occur based on the developed nature of the site, lack of suitable habitat, and isolation from any areas of natural habitat that could support sensitive wildlife species. Nesting raptors and birds have potential to occur within or adjacent to the project area.

5.5 Wetland and Non-wetland Jurisdictional Waters

No drainages, wetlands, or waters were observed within the project area nor are any anticipated to occur.

5.6 Wildlife Movement Corridors

The project area does not support any vegetation communities dominated by native vegetation, is bounded on all sides by developed land, and does not connect separate isolated areas of habitat (see Figures 3 and 4). Therefore it is does not function as a wildlife corridor.

6.0 Project Impacts

The entire project area is anticipated to be impacted by the proposed activity. Impacts to biological resources in the project area due to the proposed development are discussed below. Direct and indirect impacts to vegetation and sensitive biological resources are covered. Impacts to sensitive biological resources, wetlands and/or habitats that support a listed species would be considered significant and adverse, and would require mitigation.

6.1 Vegetation Communities

The project would impact approximately 3.0 acres of urban/developed land. This land cover type is not considered sensitive, so the impact would not be considered significant or require mitigation.

6.2 Sensitive Plants

No sensitive plant species were observed within the project area nor are any sensitive plants anticipated to occur. Therefore, no impact to sensitive plant species would occur.

6.3 Sensitive Wildlife

No sensitive wildlife species are anticipated to occur. Therefore, no impact to sensitive wildlife is anticipated.

6.4 General Wildlife

The project may cause small mammals and reptiles with low mobility to be inadvertently killed during grading of the site. This may western fence lizard and desert cottontail. Domestic dogs and most birds will be able to move out of the way during grading. Bird species may include mourning dove, American crow, northern mockingbird, and California towhee. These impacts to general wildlife would be considered less than significant.

6.5 Nesting Migratory Birds and Raptors

The project area has potential to support avian species, including migratory birds and raptors, protected by CFGC Sections 3503 and 3503.3, respectively. Raptors may occur in the adjacent gum trees and western sycamore tree, and may include red-tailed hawk and Cooper's hawk (*Accipiter cooperii*). Other nesting migratory birds have a moderate potential to occur within smaller trees, shrubs, and grasses within the project area. Vegetation removal within the project area has potential to cause indirect impacts to nesting raptors and direct impacts to other nesting migratory birds.

6.6 Wildlife Movement Corridors

No wildlife movement corridors are present within the project area. Therefore, no impact to wildlife movement corridors are anticipated.

7.0 Mitigation

Mitigation is required for impacts that are considered significant under the California Environmental Quality Act (CEQA) and by the City. Where impacts are not avoidable or cannot be minimized, mitigation is required to reduce significant impacts to a level of less than significant. The only potential impact to sensitive biological resources is to nesting migratory raptors and migratory birds. However, with implementation of the recommended mitigation measures described herein, such impact may be avoided and no significant impacts would occur.

BIO 1 Nesting Migratory Birds and Raptors

This project may directly and indirectly impact nesting migratory birds on the property if construction occurs during the typical raptor and migratory bird breeding season (i.e., February 1–September 15). The following measures are recommended to avoid or mitigate potential impacts to nesting birds.

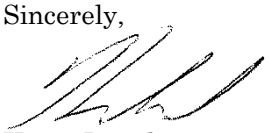
To remain in compliance with the CFGC Section 3503, no direct impacts shall occur to any nesting birds or their eggs, chicks, or nests during the breeding season as mentioned above. If project grading/brush management is proposed during the bird breeding season, the project biologist shall conduct a pre-grading survey for active nests in the development area and the gum trees and western sycamore tree adjacent to it. If active nests are detected, mitigation in conformance with applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction, and/or noise barriers/buffers, etc.) may be required. If no nesting birds are detected, no mitigation would be required.

To avoid potential direct impacts to nesting migratory birds and indirect impacts to nesting raptors protected by CFGC Sections 3503 and 3503.3, respectively, it is recommended that vegetation removal, grading, or other heavy construction activity within the project area, which may support nesting migratory birds or occur adjacent to trees supporting raptor nests, be conducted between September 16 and January 31, to avoid the avian breeding season. If such construction activities must be conducted during the breeding season, a nesting bird survey of the project area and the adjacent gum trees and western sycamore should be conducted by a qualified biologist prior to the activities to determine if any migratory bird or raptor nests are

present. If an active migratory bird or raptor nest is discovered, a buffer should be established around the nest to ensure that indirect impacts do not occur. The required buffer is typically 500 feet for raptors or 300 feet for nesting migratory birds, though it may be reduced if construction is conducted with a biological monitor present to observe any disturbance to nesting activity. No construction activity may occur within this buffer area until a biologist determines that the fledglings are independent of the nest or that no disturbance due to construction activities is observed. Indirect impacts, such as noise impacts, may cause the abandonment of an active nest.

If you have any questions regarding this letter report or the biological resources present on the site, please do not hesitate to contact me.

Sincerely,



Kevin Israel
Biologist

KVI:jg

Attachments

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ATTACHMENTS

ATTACHMENT 1

Plant Species Observed

Attachment 1 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
ANGIOSPERMS: MONOCOTS			
AGAVACEAE	**AGAVE FAMILY**		
Yucca schidigera Ortgies	Mojave yucca	U	N
ARACEAE	**ARUM FAMILY**		
Zantedeschia aethiopica (L.) Spreng.	calla-lily	U	I
ARECACEAE	**PALM FAMILY**		
Phoenix canariensis Chabaud	Canary Island palm	U	I
Washingtonia robusta H. Wendl.	Mexican fan palm	U	I
POACEAE (GRAMINEAE)	**GRASS FAMILY**		
Festuca sp.	fescue	U	I
Poa annua L.	annual blue grass	U	I
ANGIOSPERMS: DICOTS			
ADOXACEAE	**ADOXA FAMILY**		
Sambucus nigra L. ssp. *caerulea* (Raf.) Bolli [=*Sambucus mexicana*]	blue elderberry	U	N
ANACARDIACEAE	**SUMAC OR CASHEW FAMILY**		
Searsia [=Rhus] lancea (L. f.) F.A. Barkley	African sumac	U	I
APIACEAE (UMBELLIFERAE)	**CARROT FAMILY**		
Apium graveolens L.	celery	U	I
APOCYNACEAE	**DOGBANE FAMILY**		
Nerium oleander L.	common oleander	U	I
ASTERACEAE	**SUNFLOWER FAMILY**		
Baccharis sarothroides A. Gray	broom baccharis	U	N
BRASSICACEAE (CRUCIFERAE)	**MUSTARD FAMILY**		
Brassica sp.	mustard	U	I
Capsella bursa-pastoris (L.) Medik.	shephard's purse	U	I
CASUARINACEAE	**BEEFWOOD FAMILY**		
Casuarina glauca	swamp she-oak	U	I
CONVOLVULACEAE	**MORNING-GLORY FAMILY**		
Calystegia macrostegia (Greene) Brummitt	morning-glory	U	N

Attachment 1 Plant Species Observed			
Scientific Name	Common Name	Habitat	Origin
FABACEAE (LEGUMINOSAE)	**LEGUME FAMILY**		
Acacia sp.	acacia	U	I
Melilotus sp.	sweetclover	U	I
GERANIACEAE	**GERANIUM FAMILY**		
Erodium sp.	filaree, storksbill	U	I
MALVACEAE	**MALLOW FAMILY**		
Malva neglecta Wallr.	common mallow, cheeses	U	I
MYRTACEAE	**MYRTLE FAMILY**		
Eucalyptus sp.	gum tree	U	I
Melaleuca viminalis (Sol. ex Gaertn.) Bymes	weeping bottlebrush	U	I
OXALIDACEAE	**OXALIS FAMILY**		
Oxalis sp.	oxalis	U	I
PLATANACEAE	**PLANE TREE OR SYCAMORE FAMILY**		
Platanus racemosa Nutt.	western sycamore	U	N
PLUMBAGINACEAE	**LEADWORT FAMILY**		
Plumbago auriculata	blue plumbago	U	I
RUTACEAE	**RUE FAMILY**		
Citrus limon Osbeck	lemon	U	I
Citrus sinensis	sweet orange	U	I
SOLANACEAE	**NIGHTSHADE FAMILY**		
Nicotiana glauca Graham	tree tobacco	U	I
TAMARICACEAE	**TAMARISK FAMILY**		
Tamarix sp.	tamarisk	U	I

HABITATS
U = Urban

ORIGIN
N = Native to locality
I = Introduced species from outside locality

ATTACHMENT 2

Wildlife Species Observed

Attachment 2 Wildlife Species Observed				
Scientific Name	Common Name	Occupied Habitat	On-site Abundance/ Seasonality (Birds Only)	Evidence of Occurrence
INVERTEBRATES (Nomenclature for insects from Evans 2008)				
APIDAE	**HONEY BEES**			
Apis mellifera	honey bee (I)	U		O
REPTILES (Nomenclature from Crother 2008)				
PHRYNOSOMATIDAE	**SPINY LIZARDS**			
Sceloporus occidentalis	western fence lizard	U		O
BIRDS (Nomenclature from American Ornithologists' Union 2018 and Unitt 2004)				
PANDIONIDAE	**OSPREYS**			
Pandion haliaetus carolinensis	osprey	U	U/ Y	F
ACCIPITRIDAE	**HAWKS, KITES, & EAGLES**			
Buteo jamaicensis	red-tailed hawk	U	C/ Y	O
COLUMBIDAE	**PIGEONS & DOVES**			
Zenaida macroura marginella	mourning dove	U	C/ Y	O
CORVIDAE	**CROWS, JAYS, & MAGPIES**			
Corvus brachyrhynchos hesperis	American crow	U	C/ Y	O
MIMIDAE	**MOCKINGBIRDS & THRASHERS**			
Mimus polyglottos polyglottos	northern mockingbird	U	C/ Y	V
Melozone [=*Pipilo*] *crissalis*	California towhee	U	C/ Y	O
MAMMALS (Nomenclature from Baker et al. 2003)				
LEPORIDAE	**RABBITS & HARES**			
Sylvilagus audubonii	desert cottontail	U		O
CANIDAE	**CANIDS**			
Canis familiaris	domestic dog (I)	U		S

Attachment 2
Wildlife Species Observed

(I) = Introduced species

HABITATS
U = Urban

ABUNDANCE (birds only; based on Garrett and Dunn 1981)
C = Common to abundant; almost always encountered in proper habitat, usually in moderate to large numbers
U = Uncommon; occurs in small numbers or only locally

SEASONALITY (birds only)
Y = Year-round resident; probable breeder on-site or in vicinity

EVIDENCE OF OCCURRENCE
F = Flying overhead
O = Observed
S = Scat
V = Vocalization