

Appendix B1

HELIX: Response to USFWS 2019 QCB Survey Data for the Otay Ranch Proctor Valley Village 14 and Preserve Project

Memorandum

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Date: June 20, 2019

To: Sean Kilkenny, Dudek

Cc: David Hubbard, Gatzke Dillon & Ballance LLP
Liz Jackson and Rob Cameron, Jackson Pendo Development Company

From: Shelby Howard and Barry Jones

Subject: Response to USFWS 2019 QCB Survey Data for the Otay Ranch Proctor Valley Village 14 and Preserve Project

HELIX Proj. No.: JPD-08

Message:

In May 2019, the United States Fish and Wildlife Service (USFWS) released survey data for the 2019 Quino checkerspot butterfly (QCB) flight season, including survey data in the Otay Ranch area of San Diego County. The surveys reflect sightings reported to USFWS during the 2019 flight season and were reported by various biologists holding Recovery Plan permits issued by USFWS. As a condition of those permits, the biologists are required to report any QCB sightings to USFWS.

The data recorded QCB sightings in Proctor Valley, proximate to the site of the Otay Ranch Proctor Valley Village 14 and Preserve Project (Proposed Project). We reviewed the 2019 survey data to determine if the new QCB sightings affected the analysis or conclusions set forth in the Proposed Project's Environmental Impact Report (EIR). As explained below, we determined that the 2019 QCB occurrence data did not affect or require changes to the EIR or the impact conclusions drawn therein. The reasons underlying that determination are as follows:

First, none of the 2019 QCB sightings occurred within the Project site.

Second, the 2019 QCB sightings recorded near the Project site were recorded in locations where QCB have been observed during prior surveys incorporated into the EIR's analysis.

To demonstrate these points, we used the GPS coordinates provided by the biologists who conducted the 2019 surveys and plotted their QCB occurrence data on a map of Proctor Valley.

Memorandum (cont.)

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The 2019 sightings were then given “alpha” identifiers and, along with sightings from prior years, superimposed on the Project site. A description of each Proctor Valley 2019 sighting is provided below:

- 2019 Sighting A: This sighting occurred in the northeast portion of Proctor Valley, south of the Project site. In addition, this sighting occurred in almost the exact same location as a prior sighting from 2017 and approximately 1,500 feet from another 2017 QCB sighting further to the north, which was part of the analysis in the EIR.
- 2019 Sighting B: This sighting occurred roughly in the center of Proctor Valley, outside the western boundary of the Project site.
- 2019 Sighting C: This sighting occurred at a location well to the northwest of the Project site and matches up with an earlier sighting from 2017, which was addressed in the EIR.
- 2019 Sightings D, E, and F: These three sightings form a cluster near the center of the Proctor Valley map. The sightings, while near the Project site and Proctor Valley Road, coincide with earlier sightings from 2006 and 2017, and thus have already been accounted for in the EIR.
- 2019 Sightings G and H: These two sightings occurred just off the Project site near the northwest corner of the parcel known as PV1. Both sightings, however, coincide with prior QCB sightings from 2017, which were accounted for in the EIR.
- 2019 Sighting I: This sighting occurred well to the east of the Project site.
- 2019 Sightings J, K, L, M, N, O, P, Q, and R: These sightings occurred in an area well to the west of the Project site. Moreover, 8 of these 9 sightings correspond to or overlap earlier occurrences recorded in 2001 and 2017, which were accounted for in the EIR.
- 2019 Sighting S: This sighting occurred well to the east of the Project’s PV3 parcel.

The 2019 QCB sightings do not change the QCB analysis or conclusions in the EIR. The 2019 QCB survey data closely match 2017 and other previous QCB sightings, which were analyzed in the EIR. For this reason, we have determined that the 2019 QCB survey data does not alter the analysis, conclusions, or mitigation measures set forth in the Project EIR.

Attachment: Proposed Project, QCB Sightings, and Movement Widths