

MEMORANDUM

To: Adam Robinson, RAF Pacifica Group
From: Erin McKinney, Senior Habitat Restoration Specialist
Subject: Biological Resources Impact for the Eddie Jones Industrial Warehouse Project Multi-Building and Truck Bay Reduction Alternative
Date: August 2, 2024
cc: Vanessa Scheidel, Dudek
Attachment(s): Figure 1- Project Vicinity
Figure 2- Alternative Site Plan Impacts
Figure 3- Alternative Site Plan Riparian Edge 100-Foot Buffer
Figure 4- Site Plan Impacts
Figure 5- Site Plan Riparian Edge 100-Foot Buffer

This technical memorandum summarizes the evaluation of potential biological impacts of the Multi-Building and Truck Bay Reduction Alternative for the Eddie Jones Industrial Warehouse Project (Project), located in the City of Oceanside, California (Figure 1 – Project Location). The Multi-Building and Truck Bay Reduction Alternative (alternative site plan) proposes an alternate site plan footprint that includes four (4) structures with a total of 56 dock-high doors (for semi-truck use), 45 grade-level doors (for smaller delivery truck use), and 593 parking stalls which include 22 ADA stalls and 90 EV stalls (Figure 2, Alternative Site Plan Impacts and Figure 3, Alternative Site Plan Riparian Edge 100-Foot Buffer).

1 Background

The Eddie Jones Industrial Warehouse Environmental Impact Report (EIR) analyzes potential biological impacts for the single building site plan footprint totaling 566,905-square-feet (Section 4.3 of the EIR, Dudek 2023). The site plan includes 114 truck terminals, 590 parking spaces for employee/visitor parking, and 60 truck trailer parking stalls (Figure 4, Site Plan Impacts and Figure 5, Site Plan Riparian Edge 100-Foot Buffer). Dudek conducted vegetation mapping and a general biological survey in 2022. No focused surveys for special-status plants or wildlife were conducted. This following summarizes the results of Dudek's analysis of the biological impacts related to the proposed project as outlined in Section 4.3 of the EIR (Dudek 2023):

1.1 Direct Impacts

1.1.1 Vegetation Communities

The proposed project would result in permanent direct impacts to 30.33 acres of non-native vegetation. These impacts are summarized in Table 1 below.

Table 1. Permanent Impacts to Vegetation Communities and Land Covers

| Vegetation Community/Land Cover | Code | Total Impact (Acres) | Mitigation | | No Impact Wetland Buffer (Acres) |
|---------------------------------|-------|----------------------|------------|---------------------------|----------------------------------|
| | | | Ratio | Mitigation Acres Required | |
| Disturbed habitat | 11300 | 15.43 | 0 | 0 | 0.85 |
| Developed land | 12000 | 14.90 | 0 | 0 | — |
| Total | — | 30.33 | — | 0 | 0.85 |

1.1.2 Special-Status Plant Species

No special-status plants were observed during the vegetation mapping surveys in 2022 and none have moderate or high potential to occur. Therefore, the project would not result in direct impacts to special-status plant species. See Section 4.3 of the EIR for more information (Dudek 2023).

1.1.3 Special-Status Wildlife Species

Two special-status wildlife species, Belding’s orange-throated whiptail and northern harrier, were observed during the vegetation mapping surveys in 2022. There would be no direct impacts to these special-status species because no direct impact to suitable habitat would occur. Additionally, Mitigation Measure (MM) BIO-1 (Nesting Bird Surveys), MM-BIO-2 (Biological Monitoring), and MM-BIO-3 (Temporary Installation of Fencing) would be implemented, further reducing impacts to wildlife species. See Section 4.3 of the EIR for more information (Dudek 2023).

1.1.4 Jurisdictional Resources

No jurisdictional resources are present within the project site. See Section 4.3 of the EIR for more information (Dudek 2023).

1.1.5 Wildlife Corridors/Habitat Linkages

The project site is located within the WCPZ designated by the Subarea Plan (City of Oceanside 2010). However, the site has been previously developed and consists of disturbed habitat and urban/developed land. There is no coastal sage scrub habitat on the site. The project site does not contain the necessary habitat for coastal California gnatcatcher and would not serve as a steppingstone for dispersing coastal California gnatcatchers. Therefore, impacts from the proposed project would be less than significant. See Section 4.3 of the EIR for more information (Dudek 2023).

1.1.6 Wetland Buffer

The proposed project includes a 100-foot biological buffer. The buffer area consists of 0.85 acres of disturbed habitat within the project boundary and 3.51 acres of disturbed habitat and existing urban/developed areas outside the project boundary. The Draft Subarea Plan provides that “In the event that natural habitats do not currently (at the time of proposed action) cover the 100-foot buffer area, native habitats appropriate to the location and soils shall be restored as a condition of project approval.” The Draft Subarea Plan further states that “coastal sage scrub vegetation [is] the preferred habitat to restore within the biological buffer.” (City of Oceanside 2010). Therefore, impacts from the proposed project would be less than significant. See Section 4.3 of the EIR for more information (Dudek 2023).

1.2 Indirect Impacts

Potential short-term or temporary indirect impacts to special-status vegetation communities and special-status plants (if they occur) adjacent to but outside the project site would primarily result from construction activities and include impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides). Potential short-term indirect impacts could affect special-status vegetation communities and special-status plants adjacent to the biological study area in the San Luis Rey River. These impacts are described in detail in Section 4.3 of the EIR and shall be mitigated to less than significant through MM-BIO-2 (Biological Monitoring) and MM-BIO-3 (Temporary Installation of Fencing). See Section 4.3 of the EIR for more information (Dudek 2023).

1.3 Cumulative Impacts

The cumulative biological study area is the area covered by the Oceanside Subarea Plan (City of Oceanside 2010). No direct impacts to special-status plant or wildlife species would occur; therefore, the proposed project would not contribute to any cumulative sensitive species impacts. Indirect impacts would be mitigated to less than significant through implementation of MM-BIO-1 through MM-BIO-4. The project would implement standard best management practices, which would avoid contributions towards a cumulative indirect impact to special-status wildlife species and sensitive habitats. As with all other projects, the proposed project would be required to comply with the CFGC and MBTA to avoid impacts to nesting birds. Therefore, the project is not anticipated to result in significant cumulative impacts to regional biological resources. See Section 4.3 of the EIR for more information (Dudek 2023).

1.4 Minimization and Mitigation Measures

The following minimization and mitigation measures shall be implemented to reduce potential direct and indirect impacts to less than significant.

MM-BIO-1 **Nesting Bird Surveys.** Construction-related ground-disturbing activities (e.g., clearing/grubbing, grading, and other intensive activities) that occur during the breeding season (typically February 1 through September 15) shall require a one-time biological survey for nesting bird species to be conducted within the limits of grading and a 500-foot buffer within 72 hours prior to construction. This survey is necessary to ensure avoidance of impacts to nesting raptors and/or birds protected by the federal Migratory Bird Treaty Act and California Fish and Game Code, Sections 3503 and 3513. If any active nests are detected, the area shall be flagged and mapped on the construction plans or a biological resources figure, and the information provided to the construction supervisor and any personnel working near the nest buffer. Active nests will have buffers established around them (e.g., 250 feet for passerines and 500 feet for raptors) by the project biologist in the field with brightly colored flagging tape, conspicuous fencing, or other appropriate barriers or signage. The project biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to avoid inadvertent impacts to these nests. The project biologist may adjust the 250-foot or 500-foot setback at their discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). However, if needed, additional qualified monitors shall be provided in order to monitor active nests or other project activities in order to ensure all the project biologist's duties are completed. Once the nest is no longer occupied for the season, construction may proceed in the setback areas.

If construction activities, particularly clearing/grubbing, grading, and other intensive activities, stop for more than 3 days, an additional nesting bird survey shall be conducted within the proposed impact area and a 500-foot buffer.

MM-BIO-2 **Biological Monitoring.** To prevent inadvertent disturbance to areas outside the limits of grading for each phase, all grading of native habitat shall be monitored by a biologist. The biological monitor(s) shall be contracted to perform biological monitoring during all clearing and grubbing activities.

The project biologist(s) also shall:

- a. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing and grubbing to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).
- b. During clearing and grubbing, conduct meetings with the contractor and other key construction personnel each morning prior to construction activities to go over the proposed activities for the day, and for the monitor(s) to describe the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife prior to clearing and grubbing.
- c. Review and/or designate the construction area in the field with the contractor in accordance with the final grading plan prior to clearing and grubbing.
- d. Supervise and monitor vegetation clearing and grubbing weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is intact.

- e. Flush wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from occupied habitat areas immediately prior to brush-clearing activities. This does not include disturbance of nesting birds (see MM-BIO-1).
- f. Periodically monitor the construction site to verify that the project is implementing the following stormwater pollution prevention plan best management practices: dust control, silt fencing, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and weather-proof, prohibition of pets on the construction site, and a speed limit of 15 mph during daylight.
- g. Periodically monitor the construction site after grading is completed and during the construction phase to see that artificial security light fixtures are directed away from open space and are shielded, and to document that no unauthorized impacts have occurred.
- h. Keep monitoring notes for the duration of the proposed project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources.
- i. Prepare a monitoring report after the construction activities are completed, which describes the biological monitoring activities, including a monitoring log; photos of the site before, during, and after the grading and clearing activities; and a list of any special-status species observed.

MM-BIO-3 **Temporary Installation of Fencing.** To prevent inadvertent disturbance to areas outside the limits of grading for each phase, the contractor shall install temporary fencing, or utilize existing fencing, along the limits of grading.

MM-BIO-4 **Invasive Species Prohibition.** The final landscape plans shall be reviewed by the project biologist and a qualified botanist to confirm that there are no invasive plant species as included on the most recent version of the California Invasive Plant Council Inventory for the project region. In addition, any planting stock to be brought onto the project site for landscape or habitat creation/restoration/enhancement will be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to, Argentine ants (*Linepithema humile*), fire ants (*Solenopsis invicta*), and other insect pests. Any planting stock found to be infested with such pests will not be allowed on the project site or within 300 feet of natural habitats unless documentation is provided to the U.S. Fish and Wildlife Service that these pests already occur in natural areas around the project site. The stock will be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats. All temporary irrigation will be for the shortest duration possible, and that no permanent irrigation will be used, for landscape adjacent to the on-site preserve. Additionally, upon completion of construction, to avoid and minimize the presence of predators and brown-headed cowbirds on site, signs will be placed around the site near trash containers reminding people to pick up and throw away their trash properly. In addition, trash will be removed as required to prevent overflow of trash from closed trash receptacles. All trash cans will have secure lids to prevent scattering of litter. The dumpsters and recycling enclosures will be fitted with lids and kept closed to avoid attraction of scavenging mammals and birds including rats, opossum, raccoon, ravens, crows, gulls, and cowbirds. Spoil, trash, or any debris will be removed off site to an approved disposal facility.”

1.5 Regional Resource Planning Context – Compliance Review

The proposed project includes a 100-foot wetland buffer from the adjacent San Luis Rey River. Lighting will be directed down and away from the San Luis Rey River. These design features are consistent with the draft Subarea Plan; therefore, the project is in compliance with the City of Oceanside's Subarea Plan. See Section 4.3 of the EIR for more information (Dudek 2023).

2 Multi-Building and Truck Bay Reduction Alternative

The Multi-Building and Truck Bay Reduction Alternative consists of four (4) separate buildings on-site with a total footprint of 491,582 sq/ft and a total building square footage of 497,822 sq/ft (inclusive of mezzanine areas). Table 1 provides the total building area for each of the proposed structures under this alternative site plan. The proposed footprint would include 40,651 sf of office (ancillary) use, 334,275 sf of warehouse uses, and 122,896 sf of manufacturing uses. This alternative site plan would include 56 dock-high doors (for semi-truck use), 45 grade-level doors (for smaller delivery truck use), and 593 parking stalls which include 22 ADA stalls and 90 EV stalls (Figure 2, Alternative Site Plan Impacts).

3 Biological Analysis for the Multi-Building and Truck Bay Reduction Alternative

3.1 Direct Impacts for Alternative Site

The grading footprint for the alternative site plan remains the same as original site plan (Figure 2, Alternative Site Plan Impacts and Figure 4, Site Plan Impacts). The 100-foot wetland buffer would also remain the same as the original site plan (Figure 3, Alternative Site Plan Riparian Edge 100-Foot Buffer and Figure 5, Site Plan Riparian Edge 100-Foot Buffer).

The alternative site plan would still result in permanent direct impacts to 30.33 acres of non-native vegetation. These impacts are summarized in Table 1 above. As such, there would be no change to direct impacts to special status plant or wildlife species, jurisdictional resources, wildlife corridors/habitat linkages, or wetland buffers.

3.2 Indirect Impacts

No changes to potential short-term or temporary indirect impacts to special-status vegetation communities and special-status plants (if they occur) adjacent to but outside the project site would result from the alternative site plan. Potential impacts shall be mitigated to less than significant through MM-BIO-2 (Biological Monitoring) and MM-BIO-3 (Temporary Installation of Fencing). See above and Section 4.3 of the EIR for more information (Dudek 2023).

3.3 Cumulative Impacts

The alternative site plan is not anticipated to result in significant cumulative impacts to regional biological resources as no changes to the grading footprint or wetland buffer location would change (Figure 3, Alternative Site Plan Riparian Edge 100-Foot Buffer and Figure 5, Site Plan Riparian Edge 100-Foot Buffer).

3.4 Minimization and Mitigation Measures

No changes would be made to the minimization and mitigation measures.

3.5 Regional Resource Planning Context - Compliance Review

The alternative site plan would include the same 100-foot wetland buffer adjacent San Luis Rey River. Lighting will be directed down and away from the San Luis Rey River. These design features are consistent with the draft Subarea Plan; therefore, the project is in compliance with the City of Oceanside's Subarea Plan. See Section 4.3 of the EIR for more information (Dudek 2023).

4 Conclusion

In summary, the reduction in total building square footage would have no change to the biological resources. The impact analysis and mitigation measures for the alternative site plan would be the same as the original site plan, regardless of the reduction in building square footage. The mitigation measures outlined in Section 4.3 of the EIR would remain the same with no additional mitigation measures required to bring the impacts to less than significant for this alternative site plan.

5 References

City of Oceanside. 2010. Final Oceanside Subarea Plan. Accessed August 2019.
<https://www.ci.oceanside.ca.us/gov/dev/planning/subarea.asp>.

Dudek. 2023. Draft EIR for Eddie Jones Warehouse, Manufacturing and Distribution Facility Project. October.

LEGEND

- ACCESSIBLE PATH OF TRAVEL 120 MAX. SLOPE, 2% MAX. CROSS SLOPE
- PROPERTY LINE
- POLE MOUNTED LIGHT FIXTURE
- WALLPACK LIGHT FIXTURE
- TRANSFORMER WITH CONCRETE PAD (PROVIDE PROTECTION BOLLARDS PER LOCAL UTILITY OR PUBLIC WORK STANDARDS)
- LANDSCAPE AND IRRIGATION AREA
- FIRE LANE (HATCHED)
- PARKING STALL COUNT TOTAL
- DOCK HIGH TRUCK DOOR
- GRADE LEVEL TRUCK DOOR
- FUTURE DOCK HIGH TRUCK DOOR
- FIRE HYDRANT
- P.V. WITH TAMPER

SAN LUIS REY RIVER

SAN LUIS REY RIVER TRAIL

ALEX ROAD

BENET ROAD

BUILDING 1
±108,100 SF

BUILDING 2
±131,040 SF

BUILDING 3
±149,888 SF

BUILDING 4
±132,454 SF

OBJECT-FREE AREA

1"=80'

SCALE: 1"=80'-0"



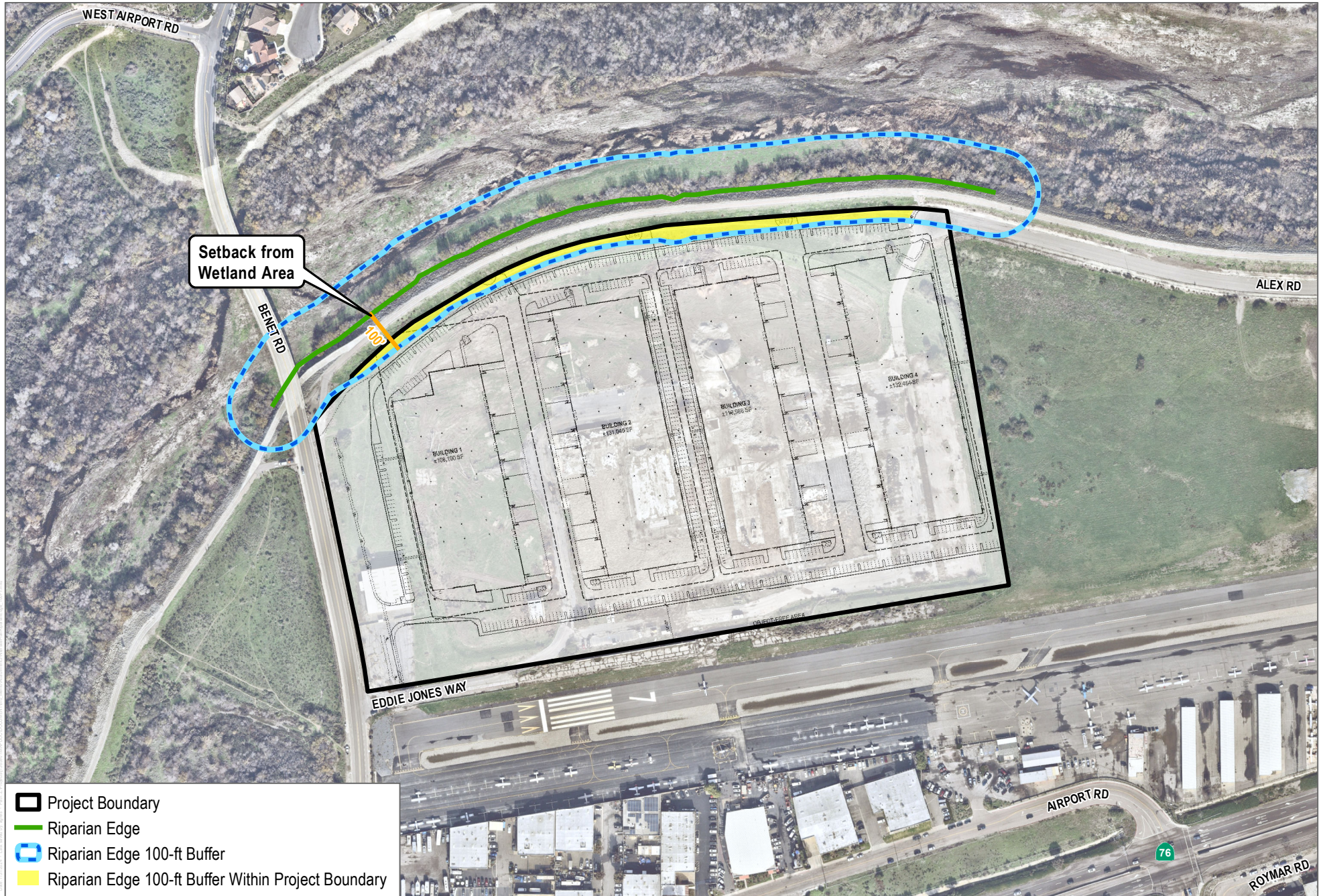
SOURCE: Ware Malcomb, 2024

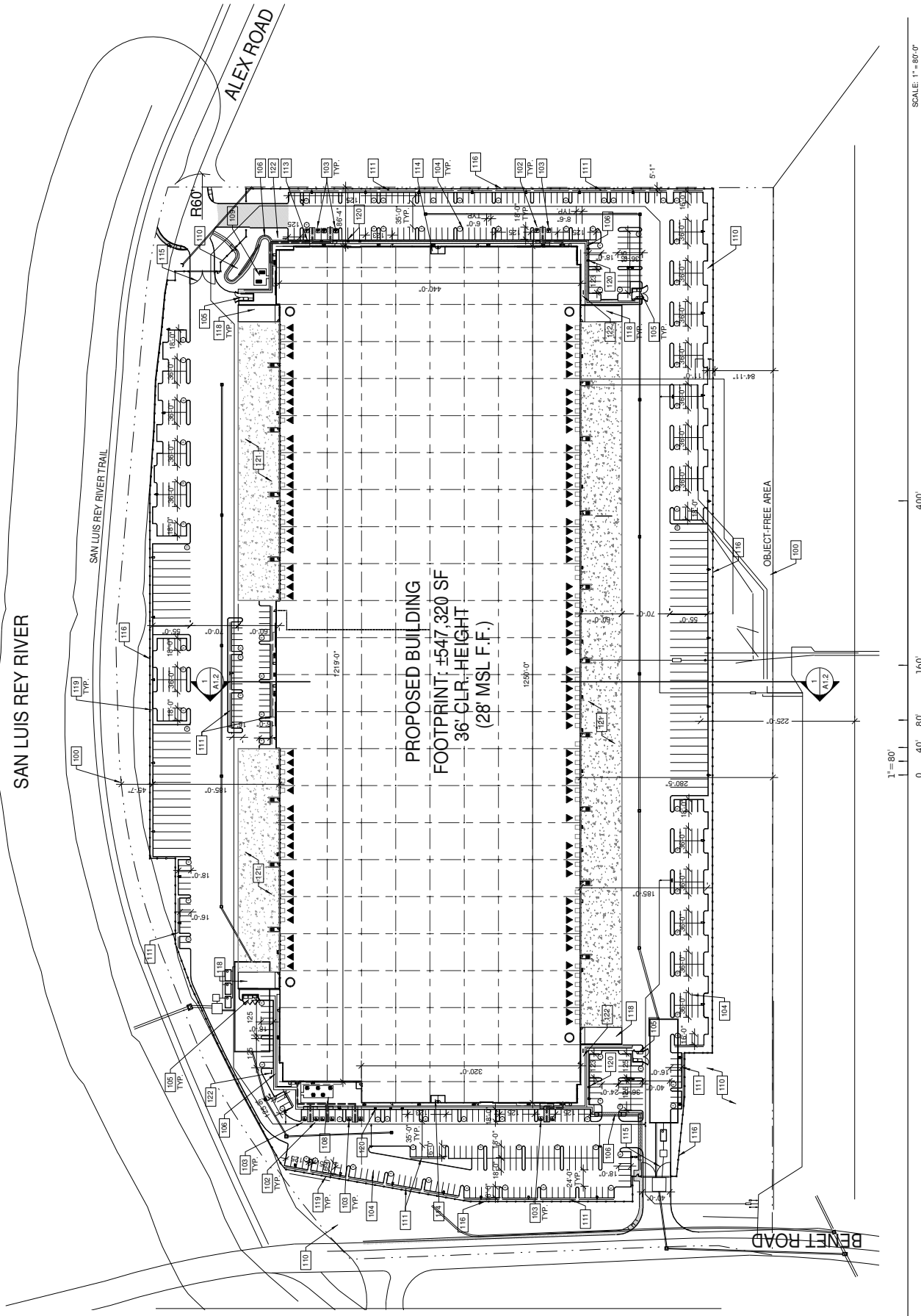
ATTACHMENT 2

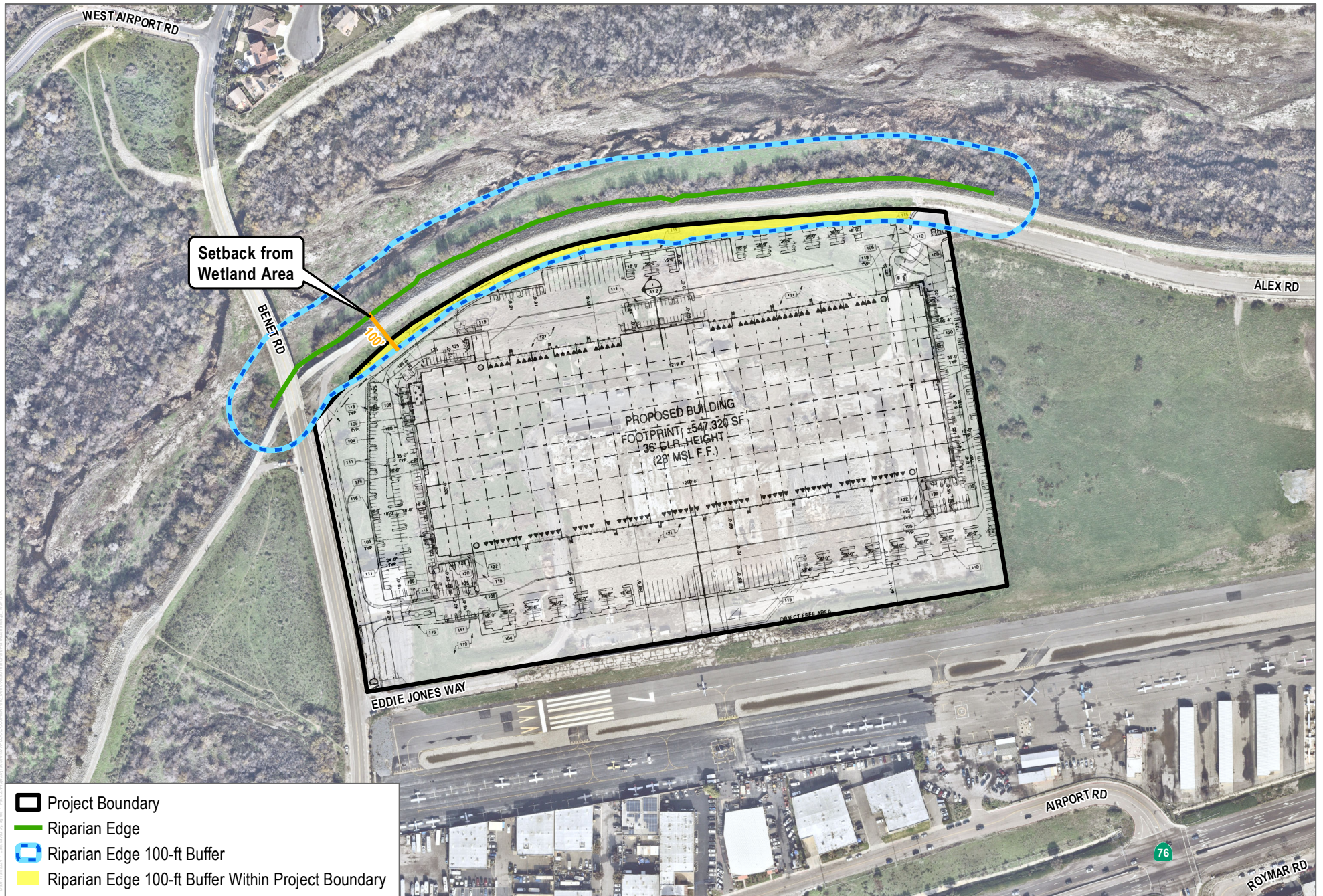
Alternative Site Plan Impacts

Eddie Jones Warehouse, Manufacturing & Distribution Facility Project









SOURCE: SANGIS 2023, 2024