October 9, 2017

(b)(6);(b)(7)(C)
U.S. Customs & Border Protection
(b)(6);(b)(7)(C)
Laguna Niguel, CA 92677

Subject: Final After-Field Summary Letter Report, Biological Surveys of the San Diego Sector (SDC) Border Wall Prototype, San Diego County, California, Task Order HSBP1017F00134, Work Order 01

Dear (b)(6);(b)(7)(C)

At the request of U.S. Customs and Border Protection (CBP), Gulf South Research Corporation (GSRC) conducted biological resources surveys on August 23, 2017 (approximately 54 acres) and September 19, 2017 (approximately 3.5 acres) of the SDC Border Wall Prototype project area. The biological resources survey is in support of the proposed construction of a border wall prototype in an approximately 120-foot by 1,000-foot corridor on the U.S./Mexico border in the alignment of the existing secondary border fence. The project area is located between the Otay Mesa Land Port of Entry (LPOE) and Tin Can Hill in San Diego County, California. The corridor currently serves as a border enforcement zone with primary and secondary border fences, an all-weather road, and border lighting and surveillance technology. The project area consists of a potential 10-acre staging area (General Service Administration [GSA] Lot), if necessary, three access roads, the border wall prototype footprint, an all-weather road, and a potential staging area (concrete washout area) within the border enforcement zone (Attachment A). The access points will be repaired or improved to support the transport of heavy trucks and equipment to the border wall prototype construction area. Construction staging will be done within the border wall prototype construction area. A concrete washout location will be located near the border wall prototype construction area at a location to be determined by CBP prior to project commencement.

This letter report is intended to provide CBP the initial findings and locations of sensitive natural resources, and will be followed by a comprehensive draft and final survey report that presents the findings of the surveys. This and the comprehensive survey report to follow will assist CBP in minimizing impacts on natural resources as part of CBP's environmental stewardship. For the Migratory Bird Treaty Act (MBTA) surveys, GSRC surveyed the project area as defined by the maps and guidance provided by CBP and a 500-foot buffer (where possible) to assess the presence of nesting and breeding birds.

Entry and Potential Staging Area:
The Entry and Potential Staging Area is bound by industrial buildings to the north and east, and by heavy-truck transport infrastructure to the west and south (Attachment B, Map 1). This area shows evidence of heavy prior disturbances in the form of grading and recent chronic mowing activities. The vegetation community can best be described as non-native grassland with mixed forbs dominated by brome grass (*Bromus* spp.), Russian thistle (*Salsola* sp.), prickly lettuce (*Lactuca serriola*), and Australian saltbush (*Atriplex semibaccata*) (Attachment C, Photographs 1 and 2). No rare, threatened, or endangered (RTE) species were observed within the Staging Area. Several small mammal burrows were observed within the survey area, primarily along the western edge of the GSA Lot. There was no evidence of occupation or use of these burrows by burrowing owls (*Athene cunicularia* [BUOW]), and no BUOWs were observed in Staging Area. No habitat indicative of vernal pools was observed within this portion of the survey area. However, the survey was conducted during the dry season and vegetation indicative of vernal pools may not be visible. There was no evidence of any active bird breeding or nesting behaviors observed.

A shallow ditch within the enforcement zone to the east of the entry and potential staging area displayed vegetation and hydrology consistent with wetlands and should be considered as potential wetland habitat (Attachment B, Map 1), (Attachment C, Photographs 3 and 4).

Exit:
The Exit Area identified in Map 1 of Attachment B, is an improved road extending from Enrico Fermi Road to the secondary border enforcement fence. The road is bound by industrial buildings to the west and a stormwater collection basin to the east, (Attachment C Photograph 5 and 6). The vegetation community in the immediate vicinity of the access road can best be described as non-native grassland with mixed forbs and shrubs dominated by brome grass, Russian thistle, prickly lettuce, tamarisk (*Tamarisk* sp.), and Australian saltbush. There is a line of large non-native Eucalyptus trees (*Eucalyptus* sp.) along the western edge of the access road. No RTE species were observed along this corridor. There was no evidence of occupation or use by BUOWs, and no BUOWs were observed in this area of the project. No habitat indicative of vernal pools was observed within this portion of the survey area. However, the survey was conducted during the dry season and vegetation indicative of vernal pools may not be visible. There was no evidence of any active bird breeding or nesting behaviors observed.

Guillen Easement Area:
The Guillen Easement Area is an unpaved heavily disturbed area running south of Via de La Amistad to the secondary border fence (Attachment B, Map 1). This area is bound by industrial buildings to the west, disturbed non-native grassland to the east, and the border enforcement zone to the south (Attachment C, Photographs 7 and 8). The vegetation community in the immediate vicinity can best be described as non-native grassland with mixed forbs and shrubs. The survey area is completely disturbed and is nearly devoid of vegetation. No RTE species were observed within this corridor. There was no evidence of occupation or use by BUOWs, and no burrowing owls or burrows were observed in

this corridor. No habitat indicative of vernal pools was observed within this portion of the survey area. However, the survey was conducted during the dry season and vegetation indicative of vernal pools may not be visible. There was no evidence of any active bird breeding or nesting behaviors observed.

Enforcement Corridor Area:
The enforcement corridor is heavily disturbed and currently serves as a border enforcement zone with primary and secondary border fences, all-weather road, and border lighting and surveillance technology (Appendix B, Maps 1, 2, and 3). Disturbances include frequent mowing of vegetation and vehicular traffic (Attachment C, Photographs 9 and 10). The vegetation community in the immediate vicinity can best be described as non-native grassland with mixed non-native forbs dominated by brome grass, Russian thistle, prickly lettuce, and Australian saltbush.

During the survey multiple BUOWs and 37 active BUOW burrows were observed in this area. GSRC biologists reported 19 BUOWs, 12 of which were observed at burrow sites (Attachment C, Photograph 11). An absolute count of BUOWs was difficult to make as a result of multiple owls flying up and down the survey corridor. The position of all active burrows and burrows with owls observed was taken using a handheld Trimble™ global positioning system (GPS) unit capable of sub meter accuracy. These burrow locations are depicted on Maps 1, 2, and 3 in Appendix B. California Department of Fish and Wildlife (CDFW) recommends a 50-meter buffer around active BUOW burrows during the non-breeding season (September 1 through January 31) (CDFW 1995, California Burrowing Owl Consortium [CBOC] 1993).

No other RTE species were observed within this portion of the survey area and other than the BUOWs, no other nesting or breeding bird behavior was observed. No habitat indicative of vernal pools was observed within this portion of the survey area.

Prototype Construction Area:
The border wall prototype construction area is located in the extreme eastern portion of the project area (Attachment B, Map 3). This area is heavily disturbed and bound by disturbed non- native grassland to the north and the U.S./Mexico Border to the south (Attachment C, Photographs 12 and 13). A majority of this portion of the survey area is devoid of vegetation. A small strip of heavily disturbed (frequently mowed) non-native forb-grassland runs along the southern edge of the survey area adjacent to the border. No RTE species were observed within this area. There was no evidence of occupation or use by BUOWs, and no BUOWs were observed in this area of the project. No habitat indicative of vernal pools was observed within this portion of the survey area. There was no evidence of any active bird breeding or nesting behavior observed.

On September 19, 2017, an additional 3.5acre area was surveyed for biological resources east of the project area (approximately 54 acres) originally surveyed on August 23, 2017. No RTE species or evidence of any active bird breeding or nesting behavior was observed in the approximately 3.5-acre area (Appendix B, Map 3). No habitat indicative

of vernal pools was observed within this portion of the survey area. There was no evidence of any active bird breeding or nesting behavior observed.

Conclusions and Recommendations:
The GSRC biologists identified a potential wetland area south of the entry and potential staging area within the border enforcement zone. This area should be avoided during construction activities.

The GSRC biologists identified multiple active BUOW burrows and BUOWs within the border enforcement zone. These areas were mapped and given a 50-meter buffer zone. To avoid disturbance of the BUOWs and BUOW burrows, care should be taken to keep all construction activity and equipment staging outside of these 50-meter buffer zones. Construction traffic through this area should be limited to the all-weather road and traffic should be restricted to 25 miles per hour. All construction personnel should be made aware of the protected status of BUOWs and general knowledge of this species identification and biology prior to admittance to the site.

No other RTE species, breeding birds, or vernal pool habitats were observed in the project areas during the biological resources surveys. Based on the survey results, GSRC will prepare a biological resources survey report. The draft report will be provided to CBP for review and comment. Upon receiving and addressing CBP comments on the draft report, GSRC will prepare the final report.

Should you need further information or clarification of this report, please contact me.

Respectfully,

(b) (6)

Project Manager
Gulf South Research Corporation

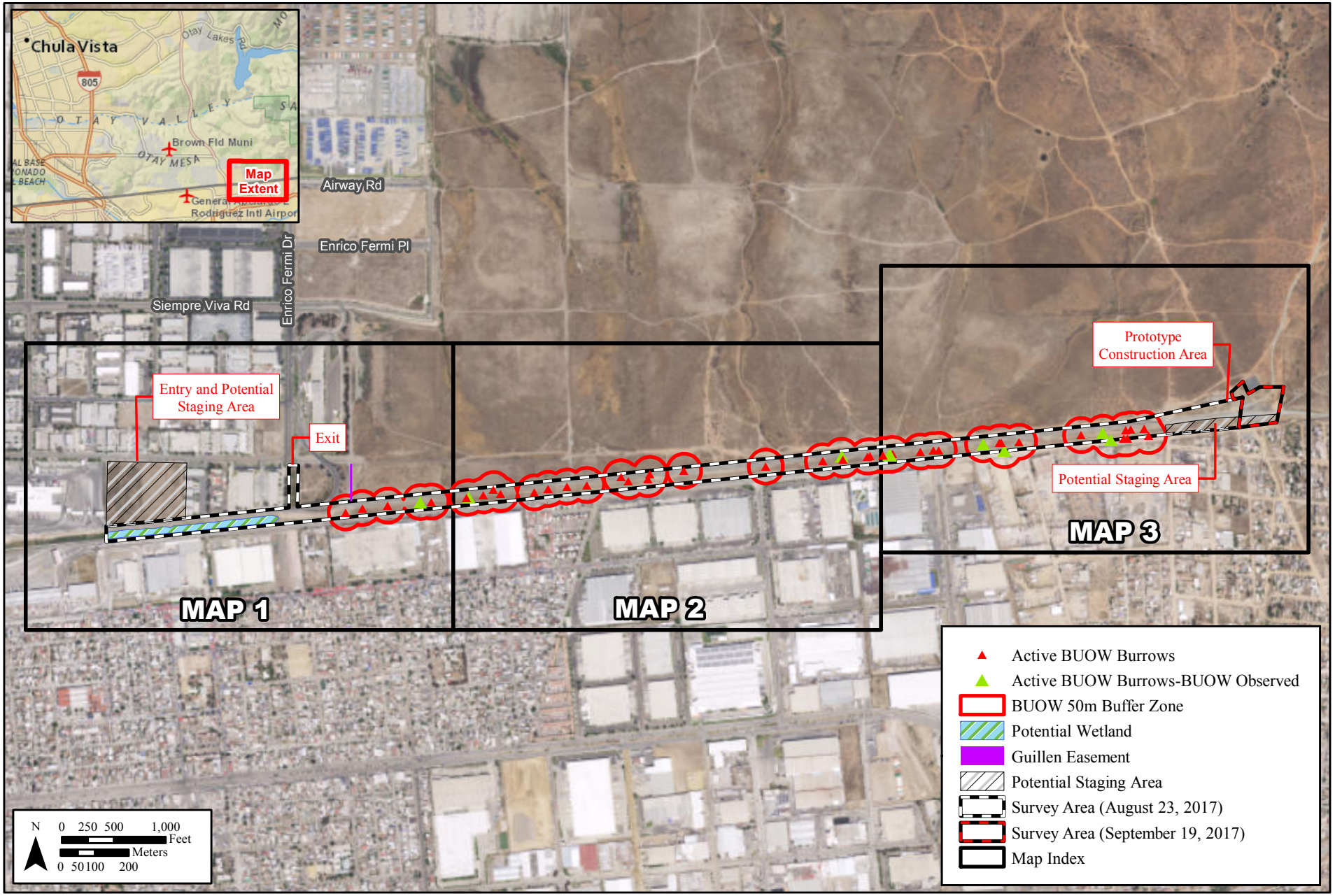
Attachments

References:

CBOC (California Burrowing Owl Consortium). 1993. Burrowing owl survey protocol and mitigation guidelines.

CDFG (California Department of Fish and Game). 1995. Staff report on burrowing owl mitigation. Unpublished report. 8 pp.

ATTACHMENT A
Project Area Overview Map



Project Survey Area
Map Index

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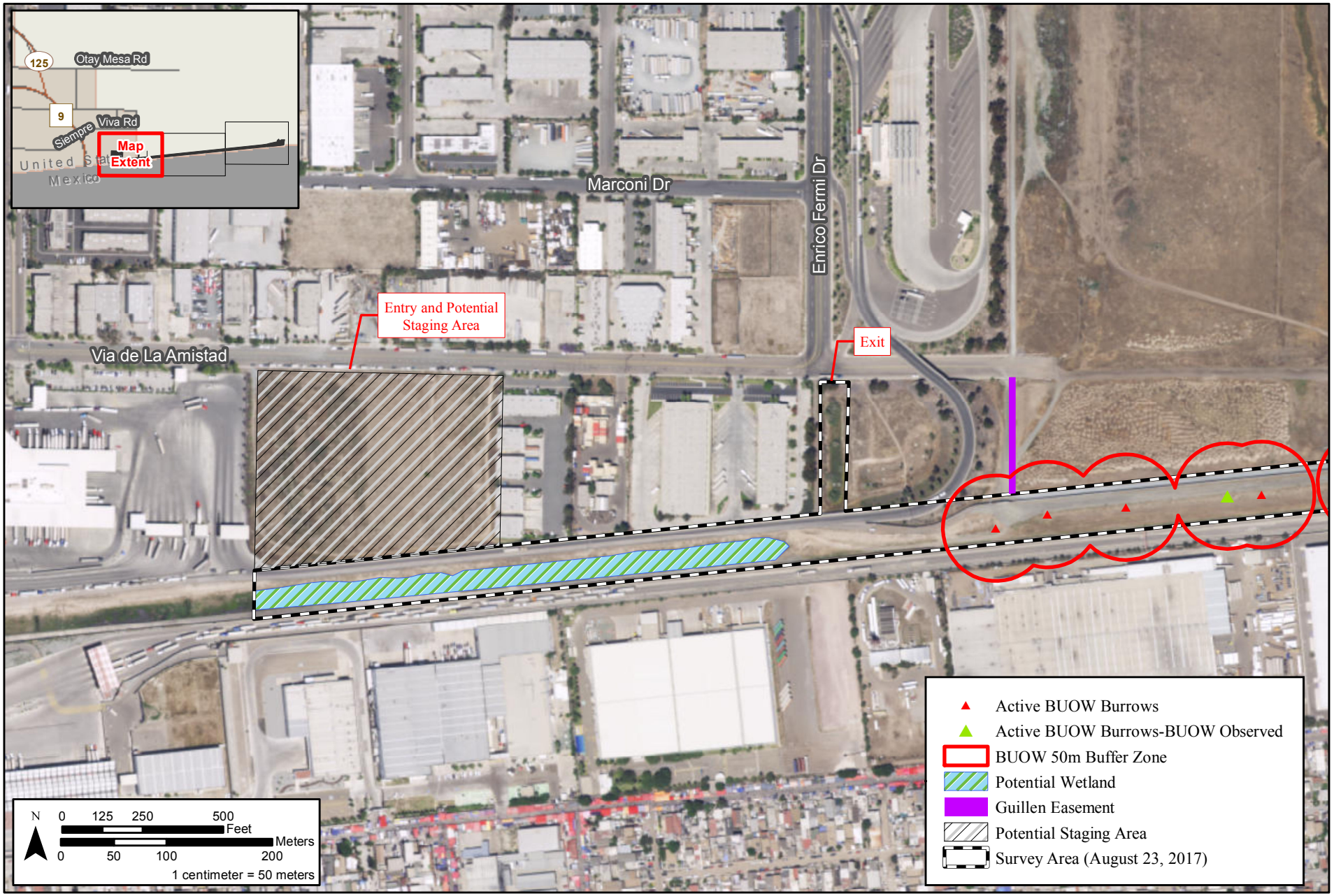
September 2017

ATTACHMENT B
Project Survey Area Maps



Project Survey Area
Map 1

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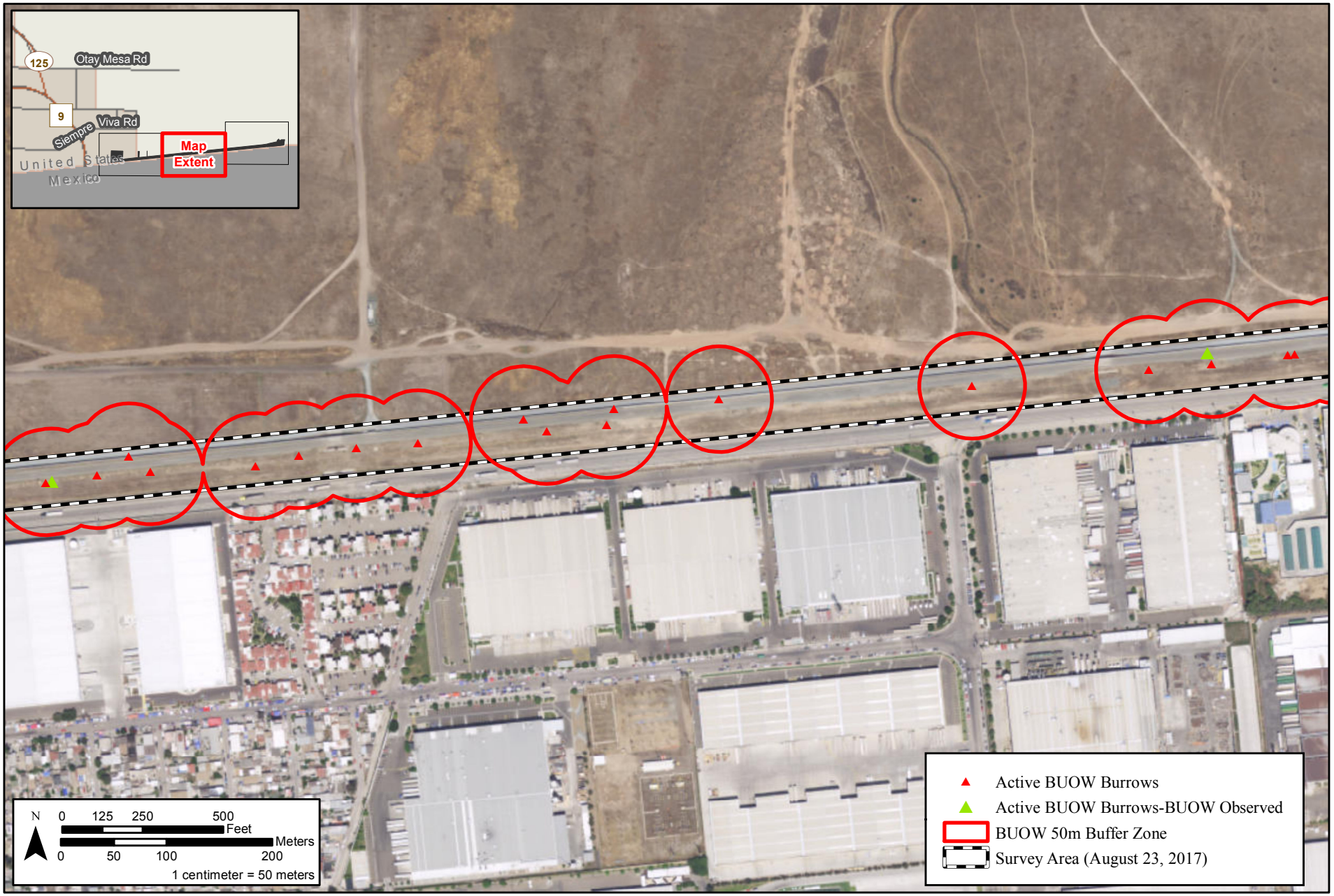
September 2017



Project Survey Area
Map 2

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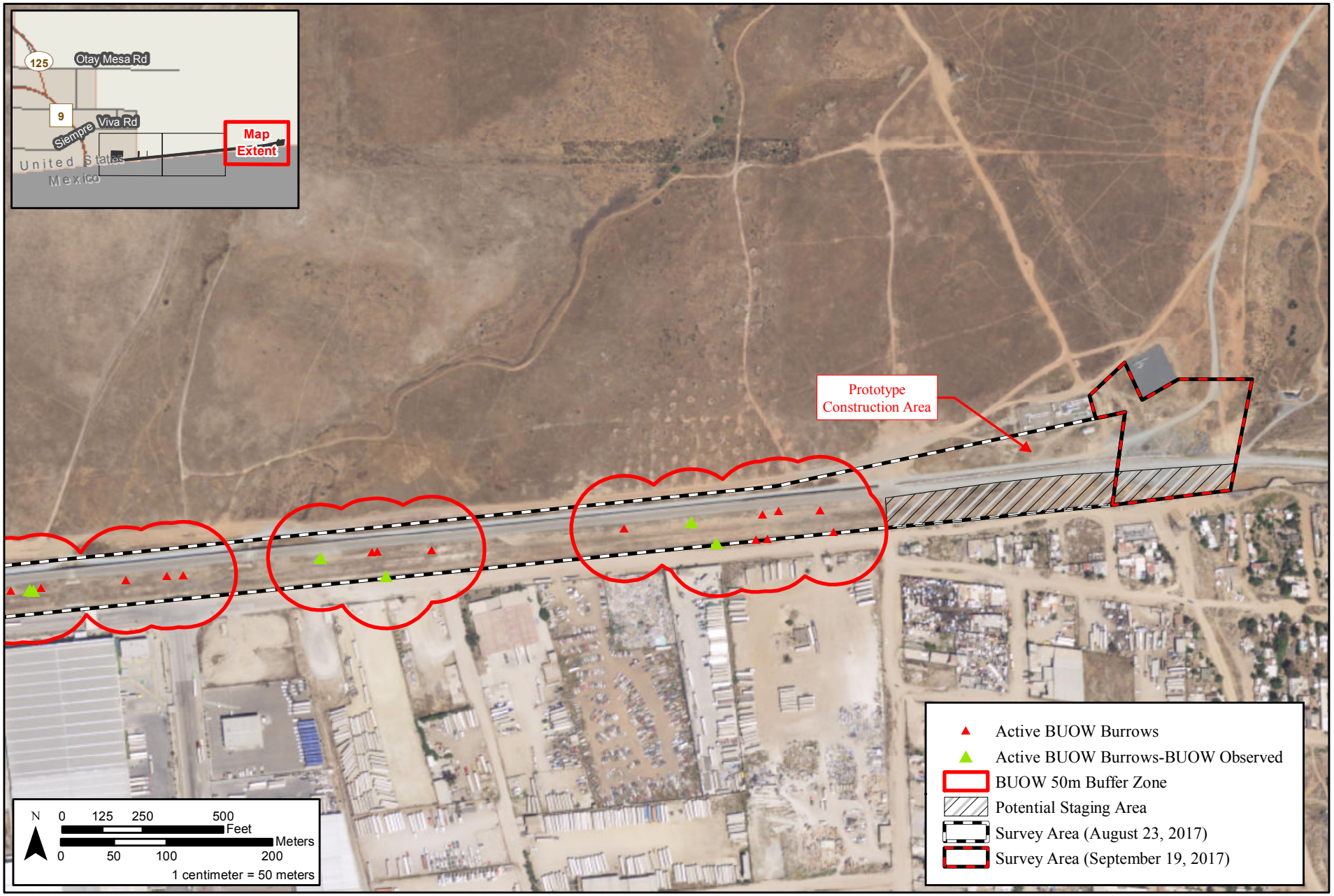

Project Survey Area
Map 3

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September 2017

ATTACHMENT C
Representative Site Visit Photographs

SDC Prototype Wall Construction Biological Resources Survey, After-Field Report Photo Pages

Photograph 1. This image depicts the heavily disturbed landscape within the entry and potential staging area, dominated by non-native species; (looking southwest from northeast corner).

Photograph 2. This image depicts the heavily disturbed landscape within the entry and potential staging area, dominated by non-native species (looking south from an approximate center of survey area).

Photograph 3. This image depicts the potential wetland immediately south of the entry and potential staging area (looking east from eastern end of project corridor).

Photograph 4. This image depicts the potential wetland immediately south of the entry and potential staging area (looking west towards the project terminus).

Photograph 5. This image depicts the Enrico Fermi Road exit survey area (looking south from north end).

Photograph 6. This image depicts the Enrico Fermi Road exit survey area (looking north from the south end).

Photograph 7. This image depicts the Guillen additional survey area; (looking northwest from south end).

Photograph 8. This image depicts the Guillen additional survey area (looking south from northern portion).

Photograph 9. This image depicts the typical level of disturbance and conditions within the border enforcement zone survey area (looking south).

Photograph 10. This image depicts the typical level of disturbance and conditions within the enforcement zone survey area (looking west from the eastern end of the project area).

Photograph 11. This image depicts an active burrowing owl burrow with invertebrate prey remains, whitewash, and decoration display.

Photograph 12. This image depicts the typical level of disturbance and conditions within the prototype construction survey area (looking east from the eastern end of the secondary fence).

Photograph 13. This image depicts the typical level of disturbance and conditions within the prototype construction survey area (looking west from the eastern end of project area).