



County of San Diego

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PLEASE NOTE THAT A FORMAL APPLICATION FOR A HABITAT LOSS PERMIT HAS NOT BEEN FILED AT THIS TIME. THE FOLLOWING IS A DRAFT FORM OF DECISION FOR A HABITAT LOSS PERMIT SHOWING THE FORMAT AND POSSIBLE CONDITIONS FOR A FUTURE HABITAT LOSS PERMIT. BECAUSE A FORMAL APPLICATION HAS NOT BEEN FILED, CERTAIN DATES, FINDINGS AND OTHER INFORMATION IS ABSENT FROM THE DRAFT FORM OF DECISION, THIS INFORMATION WILL BE INCLUDED IN THE FINAL FORM OF DECISION.

Date

V VCC Havens, LP,
C/O Steve Lane
29354 Vista Valley Drive
Vista, CA 92069

DRAFT DECISION OF THE DIRECTOR Habitat Loss Permit

APPLICATION NUMBER: HLP xx-xxx, ER

ASSOCIATED PERMIT(S): PDS2014-MUP-14-021; PDS2014-ER-14-08-008; PDS2014-VAC-14-002; Vista Valley Pool Center

NAME OF APPLICANT: V VCC Havens, LP

DESCRIPTION/LOCATION OF LOSS:

The proposed project will remove 0.29 acres of coastal sage scrub associated with the Major Use Permit MUP 14-021 as shown on the attached Habitat Loss Exhibit.

The proposed project is a Major Use Permit (MUP) for a pool facility proposed on a 9.8 acre site for the members of the existing private Vista Valley Country Club. The project site contains existing paved areas, houses and outbuildings. The proposed project is located in the Bonsall Community plan area within the unincorporated portion of northern San Diego County. The project area is just south of Gopher Canyon Road and west of Interstate 15 and accessed off of Vista Valley Drive. The project location is indicated on the attached USGS map.

Biological Resources were evaluated by AES (May 2014). The site primarily consists of coastal sage scrub, urban developed, developed, and eucalyptus woodland (Table 1). One sensitive species, turkey vulture was observed onsite, and no sensitive plant species were observed on site. Protocol California Gnatcatcher conducted with negative results in February and March of 2013.

The project is proposing to put 4.54 acre of coastal sage scrub into biological open space located on the eastern portion of the parcel, all other habitat on site will be impacted, as listed in Table 1. The Diegan coastal sage scrub habitat is considered to be of Intermediate Quality as determined by the criteria established under the Natural Community Conservation Planning (NCCP) Logic Flow Chart. Mitigation ratios and onsite open space are listed in Table 1. Therefore, all impacts associated with the development of the Vista Valley Pool Center property have been mitigated to a level below significance. The proposed project is in conformance with all standards and guidelines outlined in the NCCP Process Guidelines.

Table 1. Habitat, Impacts, and Mitigation

Habitats	Total Habitat On site	Impacts On-site	Vacation Impacts Off-site	Total Impacts	Mitigation Ratio	Total Mitigation Needed	On site Mitigation
Coastal sage scrub (CSS)	4.8	0.27	0.02	0.29	2:1/ 4:1*	0.62	4.54
Eucalyptus woodland	0.0	0.0	0.08	0.08	N/A	N/A	N/A
Disturbed	3.8	3.8	0.08	3.88	N/A	N/A	N/A
Developed	0.89	0.89	0.12	1.01	N/A	N/A	N/A
Total	9.5	4.96	0.3	5.26		0.62	4.54

* Onsite impacts are at a 2:1 ratio and impacts offsite are at a 4:1 ratio totaling 0.62 acre.

DECISION:

The Director of Planning & Development Services has approved your application for a HABITAT LOSS PERMIT. This Habitat Loss Permit approval does not become final until both the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) concur with the Director's approval, by the either of the following:

1. Concurrence implied by allowing a 30-day period, initiated by their receipt of this decision, to lapse without presenting written notification to the County that the decision is inconsistent with the Southern California Coastal Sage Scrub (CSS) Natural Community Conservation Planning (NCCP) Process Guidelines (CDFW, November 1993) or any approved subregional mitigation guidelines; or
2. Granting concurrence through written notification to the County prior to the conclusion of the 30-day period, initiated by their receipt of this decision, that the project is consistent with the Southern California CSS NCCP Process Guidelines or any approved subregional mitigation guidelines.

Pending the issuance of an associated Grading Permit, Clearing Permit or Improvement Plan from the County of San Diego, this Habitat Loss Permit allows for the loss of the above-described coastal sage scrub habitat (see attached Habitat Loss Exhibit) and incidental take of the California gnatcatcher for a period of one calendar year commencing the day concurrence is given by both the USFWS and CDFW. If the loss of habitat, as authorized by this Habitat

Loss Permit, has not occurred within this one-year period, this Habitat Loss Permit and the authorization for the loss of coastal sage scrub habitat expires.

This Habitat Loss Permit cannot be relied upon for the clearing, grading or removal of any vegetation until a valid Grading Permit, Clearing Permit or Improvement Plan has been issued from the County of San Diego authorizing such vegetation removal. Furthermore, use and reliance upon this Habitat Loss Permit cannot occur until all of the requirements as specified within the “Conditions of Approval” section of this permit have been satisfied.

CONDITIONS OF APPROVAL:

The following conditions are being placed on MUP 14-021. For the final Habitat Loss Permit, the list of conditions will be modified to require satisfaction of all conditions prior to use and reliance on the HLP.

ANY PERMIT: (Prior to the approval of any plan, issuance of any permit, and prior to occupancy or use of the premises in reliance of this permit).

BIO#1–BIOLOGICAL EASEMENT [PDS, FEE X 2]

In order to protect sensitive biological resources, pursuant to the County Guidelines for Determining Significance for Biological Resources and the Habitat Loss Permit Ordinance, a biological open space easement shall be granted. **DESCRIPTION OF REQUIREMENT:** Grant to the County of San Diego by separate document, an open space easement as shown on the approved Plot Plan. This easement is for the protection of biological resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. The only exceptions to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997, (<http://www.sdcounty.ca.gov/PDS/docs/MemoofUnder.pdf>) between the wildlife agencies and the fire districts and any subsequent amendments thereto.
2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of PDS, DPW or DPR.

DOCUMENTATION: The applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the [DGS, RP], and pay all applicable fees associated with preparation of the documents. **TIMING:**

Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit the easements shall be recorded. **MONITORING:** The [DGS, RP] shall prepare and approve the easement documents and send them to [PDS, PCC] for pre-approval. The [PDS, PCC] shall pre-approve the language and estimated location of the easements before they are released to the applicant for signature and subsequent recordation. Upon Recordation of the easements [DGS, RP] shall forward a copy of the recorded documents to [PDS, PCC] [DPR, TC] for satisfaction of the condition.

BIO#2—LBZ EASEMENT [PDS, FEE X 2]

INTENT: In order to protect sensitive biological resources, pursuant to the County Guidelines for Determining Significance for Biological Resources and the Habitat Loss Permit Ordinance, a Limited Building Zone Easement shall be granted to limit the need to clear or modify vegetation for fire protection purposes within an adjacent biological resource area. **DESCRIPTION OF REQUIREMENT:** Grant to the County of San Diego a Limited Building Zone Easement as shown on the Plot Plan. The purpose of this easement is to limit the need to clear or modify vegetation for fire protection purposes within the adjacent biological open space easement and prohibit the construction or placement of any structure designed or intended for occupancy by humans or animals. The only exceptions to this prohibition are:

1. Decking, fences, and similar facilities.
2. Sheds, gazebos, and detached garages, less than 250 square feet in total floor area, that are designed, constructed and placed so that they do not require clearing or fuel modification within the biological open space easement, beyond the clearing/fuel modification required for the primary structures on the property.

DOCUMENTATION: The applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the [DGS, RP], and pay all applicable fees associated with preparation of the documents. **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the easements shall be recorded. **MONITORING:** The [DGS, RP] shall prepare and approve the easement documents and send them to [PDS, PCC] for pre-approval. The [PDS, PCC] shall pre-approve the language and estimated location of the easements before they are released to the applicant for signature and subsequent recordation. Upon recordation of the easements [DGS, RP] shall forward a copy of the recorded documents to [PDS, PCC] for satisfaction of the condition.

BIO#3—OPEN SPACE SIGNAGE [PDS, FEE]

INTENT: In order to protect the proposed open space easement from entry, informational signs shall be installed. **DESCRIPTION OF REQUIREMENT:** Open space signs shall be placed along the western biological open space boundary as indicated on the approved Plot Plan. The signs must be corrosion resistant, a minimum of 6" x 9" in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

**Sensitive Environmental Resources
Area Restricted by Easement**

Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego, Planning & Development Services
Reference: PDS2014-MUP-14-021, PDS2014-VAC-14-002

DOCUMENTATION: The applicant shall install the signs as indicated above and provide site photos and a statement from a California Registered Engineer, or licensed surveyor, that the open space signs have been installed at the boundary of the open space easement(s). **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the open space signs shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

PRE-CONSTRUCTION MEETING: *(Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances.)*

(BIOLOGICAL RESOURCES)

BIO#4—TEMPORARY FENCING [PDS, FEE]

INTENT: In order to prevent inadvertent disturbance to Diegan coastal sage scrub habitat within the open space easement, temporary construction fencing shall be installed. **DESCRIPTION OF REQUIREMENT:** Prior to the commencement of any grading and/or clearing in association with this grading plan, temporary orange construction fencing shall be placed to protect from inadvertent disturbance of all open space easements that do not allow grading, brushing or clearing. The placement of such fencing shall be approved by the PDS, Permit Compliance Section. Upon approval, the fencing shall remain in place until the conclusion of grading activities after which the fencing shall be removed. **DOCUMENTATION:** The applicant shall provide evidence that the fencing has been installed and have a California licensed surveyor certify that the fencing is located on the boundary of the open space easement(s). The applicant shall submit photos of the fencing along with the certification letter to the [PDS, PCC] for approval. **TIMING:** Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances the fencing shall be installed, and shall remain for the duration of the grading and clearing. **MONITORING:** The [PDS, PCC] shall either attend the preconstruction conference and approve the installation of the temporary fencing, or review the certification and pictures provided by the applicant.”

BIO#5—RESOURCE AVOIDANCE [PDS, FEE X2]

INTENT: In order to avoid impacts to California gnatcatcher and migratory birds, which are a sensitive biological resource pursuant to the Migratory Bird Treaty Act (MBTA), a Resource Avoidance Area (RAA), shall be implemented on all plans. **DESCRIPTION OF REQUIREMENT:** There shall be no brushing, clearing and/or grading such that none will be allowed within 300 feet of Diegan coastal sage scrub habitat during the breeding season of the California gnatcatcher and migratory birds. The breeding season is defined as occurring between February 15th and August 31st. The Director of PDS [PDS, PCC] may waive this condition, through written concurrence from the US Fish

and Wildlife Service and the California Department of Fish and Wildlife, provided that no California gnatcatcher and migratory birds are present in the vicinity of the brushing, clearing or grading. **DOCUMENTATION:** The applicant shall provide a letter of agreement with this condition; alternatively, the applicant may submit a written request for waiver of this condition. Although, No Grading shall occur within the RAA until concurrence is received from the County and the Wildlife Agencies. **TIMING:** Prior to preconstruction conference and prior to any clearing, grubbing, trenching, grading, or any land disturbances and throughout the duration of the grading and construction, compliance with this condition is mandatory unless the requirement is waived by the County upon receipt of concurrence from the Wildlife Agencies. **MONITORING:** The [DPW, PDC] shall not allow any grading in the RAA during the specified dates, unless a concurrence from the [PDS, PCC] is received. The [PDS, PCC] shall review the concurrence letter.”

FINAL GRADING RELEASE: *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

(BIOLOGICAL RESOURCES)

BIO#6–OPEN SPACE SIGNAGE [PDS, FEE]

INTENT: In order to comply with Condition Bio #3 pursuant to the adopted Mitigation Monitoring and Reporting Program (MMRP) for PDS2014-MUP-14-021, the signage shall be installed. **DESCRIPTION OF REQUIREMENT:** The open space signs shall be placed along the western open space boundary as shown on these plans and the approved Conceptual Grading and Development Plan for PDS2014-MUP-14-021.

1. Evidence shall be site photos and a statement from a California Registered Engineer, or licensed surveyor that the open space signs have been installed.
2. The signs must be corrosion resistant, a minimum of 6” x 9” in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

Sensitive Environmental Resources Area Restricted by Easement

Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego,
Planning & Development Services
Reference: PDS2014-MUP-14-021, PDS2014-VAC-14-002

DOCUMENTATION: The applicant shall install the signage and provide the documentation photos and certification statement to the [PDS, PCC]. **TIMING:** Prior to the occupancy of any structure and prior to Final Grading Release ([Grading Ordinance Sec. 87.421.a.3](#)) the signage shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

BIO#7-EASEMENT AVOIDANCE [PDS, FEE]

INTENT: In order to protect sensitive resources, pursuant to [County Grading Ordinance Section 87.112](#) the open space easements shall be avoided. **DESCRIPTION OF REQUIREMENT:** The easement indicated on this plan is for the protection of sensitive environmental resources including Diegan coastal sage scrub and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. It is unlawful to grade or clear within an open space easement, any disturbance shall constitute a violation of the [County Grading Ordinance Section 87.112](#) and will result in enforcement action and restoration. The only exceptions to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997, (<http://www.sdcounty.ca.gov/PDS/docs/MemoofUnder.pdf>) between the wildlife agencies and the fire districts and any subsequent amendments thereto.
2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of PDS, DPW or DPR.

DOCUMENTATION: The applicant shall provide a letter statement to the [PDS, PCC] stating that all Sensitive Resource Easements were avoided during the grading construction, and that no impacts or encroachment into the open space occurred. **TIMING:** Prior to Final Grading Release the letter verifying the easements were not disturbed shall be submitted. **MONITORING:** The [DPW, PDCI] shall not allow any grading, clearing or encroachment into the open space easement.”

ENVIRONMENTAL FINDINGS:

A. CEQA Findings

TO BE PROVIDED

B. FINDINGS MADE IN SUPPORT OF THE ISSUANCE OF THE HABITAT LOSS PERMIT:

The following findings are made based upon all of the documents contained in the record for this project, and pursuant to Section 86.104 of County of San Diego Ordinance No. 8365 (N.S.) and Section 4.2.g of the CSS NCCP Process Guidelines (CDFW, November 1993):

Finding 1.a: The habitat loss does not exceed the five percent guideline.

The proposed project will impact 0.29 acres of coastal sage scrub and no pairs of California gnatcatcher (*Polioptia californica*) present onsite. Approved coastal sage scrub losses as of the date of August 2014 and including this approval, for the entire unincorporated County, outside the boundaries of the Multiple Species Conservation Program (MSCP), are presented in the following table:

Unincorporated Area Coastal Sage Scrub Cumulative Losses	
Total loss allowed under five percent guideline:	2953.30 acres
Cumulative loss of Coastal sage scrub to date:	1187.98 acres
Net loss due to this project:	0.29 acres
Total cumulative loss:	1188.27 acres
Remaining loss under five percent guideline:	1765.03 acres

Finding 1.b: The habitat loss will not preclude connectivity between areas of high habitat values.

The 0.29 acres of coastal sage scrub onsite is of intermediate value as outlined by the flow chart in the NCCP Guidelines. The CSS habitat on the eastern side of the site is shown as high value on the County habitat evaluation map. The project will directly impact only 0.29 acres CSS on site and off site within the allowed off site fire clearing zone. The majority of CSS onsite (94%) will be preserved onsite within a biological open space easement.

Loss of this habitat will not preclude connectivity between areas of high habitat values, because lands to the north and south are impacted by existing residential development. A large area of undeveloped land with high habitat values is located west of the project site within South Fork Gopher Canyon Creek in the San Luis Rey Watershed. There is also approximately 50 acres of undeveloped CSS directly east of the site. To avoid impacts the project site is dedicating a biological open space easement and limited building zone adjacent to this undeveloped land. To protect sensitive species after construction, permanent fencing and signage will be constructed at the interface between the preserved habitat and residential development. Therefore the project impacts are not considered within a wildlife linkage or corridor. For these reasons, the habitat loss associated with the project will not preclude connectivity between areas of high habitat values.

Finding 1.c: The habitat loss will not preclude or prevent the preparation of the subregional NCCP.

Development of this site would not foreclose on the ability to create a viable preserve in the subarea and subregion, the majority of CSS on site will be preserved; therefore if any additional preservation is proposed to the east in the future it will only increase the viability of the preserve. The CSS habitat onsite and directly adjacent to the east is identified for conservation within the Draft North County MSCP. Although no California gnatcatchers were found onsite during protocol surveys, and the site contains no sensitive plant species, it contains high value coastal sage scrub and may be home to resident or transient species in the future. One (1) sensitive wildlife species was observed onsite: turkey vulture. By preserving 4.5 acres (94%) of high value habitat onsite, development of the least sensitive portion of the site will not have a significant

regional impact to these and other sensitive species. Since the acreage of habitat impact is small and surrounded on two sides by residential development, the habitat loss will not preclude or prevent the preparation of the subregional NCCP.

Finding 1.d: The habitat loss has been minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the NCCP Process Guidelines.

A portion of the coastal sage scrub habitat on the project site will be impacted by the projects fuel modification zone, which totals 0.29 acres. By design the project is avoiding and preserving 4.5 acres of CSS, roughly 94% of the CSS habitat onsite. The habitat impacts are considered of “intermediate” value, pursuant to the NCCP Logic Flow Chart. The high value coastal sage scrub on the eastern portion of the site is being preserved within biological open space which was determined to be viable due to its connection with offsite undeveloped habitat. The area of the site to be developed is currently disturbed; therefore impacts have been designed within the least sensitive portions of the site surrounded by existing nearby development to the north, south, and west sides. The project will preserve the highest quality habitat on site, an area dominated by mature CSS. Permanent fencing and signage will prevent indirect impacts to the onsite preserved habitats. To ensure the proposed development does not impact any California gnatcatcher or migratory birds no brushing, clearing and/or grading will be allowed within 300 feet of Diegan coastal sage scrub habitat during the breeding season of the California gnatcatcher and migratory birds. The breeding season is defined as occurring between February 15th and August 31st. As such, the loss of Diegan coastal sage scrub will be mitigated to the maximum extent practicable with breeding season avoidance and onsite preservation in accordance with Section 4.3 the NCCP Process Guidelines.

Finding 2 The habitat loss will not appreciably reduce the likelihood of survival and recovery of listed species in the wild.

Protocol California gnatcatcher surveys were performed in February- March of 2013 with negative results. No sensitive plant species were observed or have a high potential to occur on-site. One sensitive wildlife species, turkey vulture was observed onsite. There will be potential impacts to this sensitive species due to this project, but the site does not contain regionally important populations nor provide significant habitat for these species. To mitigate for the loss of CSS habitat due to the project, onsite preservation of 4.5 acres of CSS is proposed. Through the onsite preservation and breeding season avoidance, the proposed development of the project site will not appreciably reduce the likelihood of the survival and recovery of listed species.

Finding 3: The habitat loss is incidental to otherwise lawful activities.

The project will require grading plans for the proposed development. The issuance of a Habitat Loss Permit by the County of San Diego, with the concurrence of the Department of Fish and Wildlife and U.S. Fish and Wildlife Service and approval by the County of San Diego of a Grading Permit, Clearing Permit, or Improvement Plan is required prior to the clearing of any coastal sage scrub supported on the project site. No state or federal permits are identified as being required at this time. Construction and/or land use modification will not commence until all appropriate permits have been issued. The project has been found to be in conformance with Section 86.104 of the San Diego County Code. As such, the anticipated loss will be incidental to “otherwise lawful activities”.

NCCP FLOWCHART

1. Is natural vegetation present? **Yes.**
2. Is Coastal sage scrub present? **Yes.**
3. Is Coastal sage scrub the most dense in the subregion? **No.**
4. Is the land close to high value district. **Yes.**
5. Is the land located in a corridor between higher value districts. **No.**
6. Does the land support high density of target species? **No.**

Based on the NCCP Logic Flow Chart, the quality of habitat supported on the MUP 14-021 project is defined as being "Intermediate Value."

MITIGATION MONITORING AND REPORTING PROGRAM:

The following shall be the Mitigation Monitoring or Reporting Program for this Habitat Loss Permit:

Public Resources Code Section 21081.6 requires the County to adopt a mitigation reporting or monitoring program for any project that is approved on the basis of a mitigated Negative Declaration or an Environmental Impact Report for which findings are required under Section 21081(a)(1). The program must be adopted for the changes to a project which the County has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment. The program must be designed to ensure compliance during project implementation.

The mitigation monitoring program is comprised of all the environmental mitigation measures adopted for the project. The full requirements of the program (such as what is being monitored, method and frequency, who is responsible, and required time frames) are found within the individual project conditions. These conditions are referenced below by category under the mechanism which will be used to ensure compliance during project implementation.

- Subsequent Project Permits

Compliance with the following conditions is assured because specified subsequent permits or approvals required for this project will not be approved until the conditions have been satisfied:

1-7

- Enforcement

Compliance with the following conditions is assured because complaints of non-compliance may be provided by the public to the County which may then investigate the status of compliance and pursue enforcement:

N/A

- Ongoing Mitigation

Compliance with the following conditions is assured because County staff will monitor the on-going requirements and, if necessary, pursue the remedies specified in the project permit, the security agreement, or the mitigation monitoring agreement:

HABITAT LOSS EXHIBIT

USGS MAP

