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April 12, 2018

VIA EMAIL AND U.S. MAIL

Josh Menvielle
Land Use/Environmental Planner
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: County's Incomplete Response to Golden Door's Public Records Act
Request Regarding the Draft NC MSCP and Newland Sierra Project Site

Dear Mr. Menvielle:

I am writing on behalf of Golden Door Properties, LLC ("Golden Door") regarding its August 8, 2017 request under the Public Records Act for records relating to the North County Multiple Species Conservation Program ("NC MSCP") and the Newland Sierra project site. We thank you for your response; however, your response appears incomplete. Several of our requests were not met, and some documents appear to have been improperly withheld or redacted. We ask that you supplement your response within 10 calendar days of the date of this letter and provide any necessary clarifications regarding the County's basis for withholding certain information.

As you know, the Golden Door opposes the Newland Sierra project and has reviewed and commented on the County's environmental documents for that project. The biological analysis in the draft environmental impact report ("DEIR") for the Newland project relies on a proposed "hardline" designation for the project site in the NC MSCP—a plan that is in draft form and has not been published, despite previous representations that the draft plan would be made publicly available by the end of 2017. In order to more fully understand the County's purported justification for this proposed "hardline" designation, the Golden Door requested information from the County under the Public Records Act. The County has repeatedly asserted that it has scientific evidence to support its characterization of the Newland project site as a "hardline" in the NC MSCP; yet, this information has not been provided to the public. The documents produced by the County in response to the Golden Door's August 8, 2017 request fail to support the County's claims and raise significant concerns about the characterization of the Newland site as a "hardline" project in the draft NC MSCP. The effect of this failure is compounded because the Newland Sierra project's DEIR relies on these unsupported claims and illusory analysis regarding the NC MSCP to make significance determinations under the California Environmental Quality Act ("CEQA").

Unless the County provides this underlying analysis and evidence as previously requested, we must conclude that the inclusion of the Newland Sierra project in the NC MSCP was the result of a political concession in favor of a developer advocating for an unapproved amendment to the General Plan and not the result of an actual, good faith, substantive planning effort based on biological principles and evidence or an objective and good faith environmental review. The absence of this evidence calls into question the veracity of the following statements made in the County's June 5, 2017 letter (from County Planning and Services Director Mark Wardlaw):

- “[I]nclusion of the Project in the Draft Plan does not, in any manner, indicate County support for the Project or provide the Project with an approval advantage.”
- “The Project’s inclusion in the Draft Plan reflects the County’s view that the Project’s proposed development footprint and open space preserve area should be considered within the conservation analysis for the Draft Plan but does not give the project any preferential treatment or eliminate any mitigation requirements.”
- “A fundamental piece of the Draft Plan will be a conservation analysis that forms the scientific basis upon which the Wildlife Agencies will base their biological opinions and findings in order to issue the County an Incidental Take Permit per the Act. The conservation analysis is currently in a working draft form that includes a preliminary analysis of potential impacts in the planning area, as well as an analysis of potential build-out of a preserve through mitigation, avoidance, and land acquisition. In order to complete this analysis, the County conducted an assessment of potential projects that are currently expected to occur within the planning area for the Draft Plan.”

Should any such evidentiary support actually exist, the County must provide it to the public and re-circulate the Newland Sierra DEIR. If no such evidentiary support exists – which would be contrary to the County’s prior public statements – the County must remove any analysis or conclusions relying upon the non-existent biological analysis in the Newland Sierra DEIR and recirculate the document.

I. THE COUNTY HAS FAILED TO PROPERLY DISCLOSE PUBLIC RECORDS IN RESPONSE TO THE GOLDEN DOOR’S REQUEST.

The Golden Door’s August 8, 2017 records request cited specific language from (1) a June 5, 2017 letter from County Planning and Services Director Mark Wardlaw (**Attachment A**) and (2) a May 23, 2017 draft of the NC MSCP, and requested various documents and communications regarding the same. The County, however, has failed to provide such documents, which include a preliminary conservation analysis, documents pertaining to County biologists, a specific request from a project applicant, and specific biological surveys. Notably, we are now approaching a year that these issues continue to be unresolved, and the public has still not seen a revised draft of the NC MSCP or the explanations or analysis that Mr. Wardlaw promised in his letter from last June. Notably, Mr. Wardlaw repeatedly stated in his June 5, 2017

letter that a new draft NC MCSP, along with supporting evidence, would be released to the public for review “by the end of 2017.” Nearly half-way through 2018, we have yet to see this new draft or the supporting evidence that the County asserts exists but refuses to disclose.

Preliminary Conservation Analysis. The Golden Door requested the “preliminary conservation analysis” referenced in Mr. Wardlaw’s June 5, 2017 letter and various communications pertaining thereto. The documents produced by the County do not appear to include a “preliminary conservation analysis.” The County produced a document titled “Preliminary Comments on the Conservation Strategy Methodology by FWS for discussion at 4-13-17 meeting w/ County.” This document is attached as **Attachment B**. Attachment B appears to be a list of comments prepared by the U.S. Fish and Wildlife Service (“USFWS”) responding to a separate “conservation analysis” with specific page references. The underlying document to which the USFWS comments respond, however, is not provided. Further, the “preliminary conservation analysis” noted in Mr. Wardlaw’s letter appears to reference a document prepared by “County biologists,” not a document prepared by USFWS.¹

Please provide the “preliminary conservation analysis” referenced in Mr. Wardlaw’s letter and the authors and date of such document. Please also provide all related documents and communications, as requested in the Golden Door’s August 8, 2017 letter, to the extent such documents have not already been disclosed. Should the County determine that any records or portions of records might be exempt from disclosure, pursuant to Government Code section 6253, please disclose the non-exempt portion of the document and redact the portion the County asserts is exempt from disclosure and state the specific legal basis upon which such information is being withheld.

County Biologists. The Golden Door requested communications related to the Newland Sierra project site and the “County biologists” referenced in Mr. Wardlaw’s June 5, 2017 letter. The documents produced by the County do not identify any “County biologists” and do not provide any contracts or other documents demonstrating a relationship between any biologists and the County that demonstrate the existence of any “County biologists.” The County’s own CEQA Guidelines require a memorandum of understanding following a specific form to be executed with consultants, such as any “County biologists” providing analysis for the NC MCSP.²

Two email chains produced by the County include communications with Tom Oberbauer of AECOM. One email chain from December 19, 2016, includes an email sent from County staff member Alexandra Elias to Mr. Oberbauer in which she asks whether Mr. Oberbauer is “doing

¹ The complete sentence in Mr. Wardlaw’s June 5, 2017 letter referencing the “preliminary conservation analysis” reads as follows: “In conducting the preliminary conservation analysis, ***County biologists*** believe that the open space design and future preservation of the 1,209 acres of land that the Project proposes complements the anticipated preserve and Pre-Approved Mitigation Area for the Draft Plan.” (Emphasis added.)

² The County’s CEQA Guidelines, including a sample memorandum of understanding, are available online at <http://www.sandiegocounty.gov/pds/docs/CEQAGDLN.pdf>.

the ‘project review’ of the proposed Newland hardline for consistency with the Planning Agreement/NC Plan.” This email is attached as **Attachment C**. No response to Ms. Elias’s question is provided.

The second email chain ranges from December 7, 2016, to December 19, 2016, and includes a request from Ms. Elias to Mr. Oberbauer to “have a biologist that knows the NC plan look at a proposed hardline for a project to ensure that making findings can be made prior to including it in the Plan.” Ms. Elias goes on to note that draft findings and “other bio info” have already been prepared and are ready for Mr. Oberbauer’s review. In a subsequent email on this chain, Mr. Oberbauer states that he can review the information. The name of the project referenced in this second email chain is not provided, and no responsive analysis from Mr. Oberbauer is included. This second email chain is attached as **Attachment D**. We also note that portions of Attachment D have been improperly redacted. (Discussed further below.)

Based on review of the County’s production, therefore, it appears that the County considers Mr. Oberbauer to be its sole biologist, the County lacks any formal agreement with Mr. Oberbauer, and the County is unable to produce any biological analysis provided by Mr. Oberbauer. Moreover, it appears that Mr. Oberbauer was provided with findings and “other bio info” that had been prepared by someone else and that he did not provide any unique analysis or data. In addition, we note that Mr. Oberbauer is not included on the County’s list of approved CEQA consultants (**Attachment E**). Finally, Mr. Wardlaw’s letter referred to “County biologists” in the plural, but the documents produced by the County provide no indicia of any other individual that could potentially be construed as one of the “County biologists” referenced by Mr. Wardlaw.

Please provide the names of all “County biologists” referenced in Mr. Wardlaw’s letter, describe the relationship of such biologists to the County, and provide any documents, including contracts or other agreements, setting forth or describing the relationship between such biologists and the County. Please also provide all related documents and communications, as requested in the Golden Door’s August 8, 2017 letter, to the extent such documents have not already been disclosed. Should the County determine that any records or portions of records might be exempt from disclosure, pursuant to Government Code section 6253, please disclose the non-exempt portion of the document and redact the portion the County asserts is exempt from disclosure and state the specific legal basis upon which such information is being withheld.

Applicant’s Request. The Golden Door requested documents and communications related to the “applicant’s request” that the Newland Sierra project site be included as a “hardline” project in the draft NC MSCP, which is noted in a May 23, 2017 draft of the NC MSCP. The County produced no such request from the “applicant,” which is presumably Newland Sierra. Please provide the “applicant’s request” referenced in the May 23, 2017 draft of the NC MSCP and all related documents and communications, as requested in the Golden Door’s August 8, 2017 letter, to the extent such documents have not already been disclosed. Should the County determine that any records or portions of records might be exempt from disclosure, pursuant to Government Code section 6253, please disclose the non-exempt portion of the document and redact the portion the County asserts is exempt from disclosure and state the specific legal basis upon which such information is being withheld. Please note that any

communications from Newland Sierra or its representatives to the County regarding the NC MSCP may not be subject to any claim of privilege, because Newland Sierra is not a party to the NC MSCP.

Biological Surveys. The Golden Door requested specific “[b]iological surveys” referenced in the May 23, 2017 draft NC MSCP, which purportedly were conducted between 2000 and 2015, as well as related documents and communications. The County’s disclosure did not include any biological surveys. Please provide the “[b]iological surveys” referenced in the May 23, 2017 draft of the NC MSCP and all related documents and communications, as requested in the Golden Door’s August 8, 2017 letter, to the extent such documents have not already been disclosed. Should the County determine that any records or portions of records might be exempt from disclosure, pursuant to Government Code section 6253, please disclose the non-exempt portion of the document and redact the portion the County asserts is exempt from disclosure and state the specific legal basis upon which such information is being withheld.

II. THE COUNTY IMPROPERLY WITHHELD AND REDACTED DOCUMENTS

In addition to our concerns that the County failed to provide documents responsive to the Golden Door’s request, we are concerned that certain documents and information have been improperly withheld or redacted. The California Public Records Act dictates that public records must be disclosed to the public, upon request, unless there is a legal basis not to do so. The County has asserted blanket privilege and withholding claims, without providing the specific basis for nondisclosure of the information. Any exemption to disclosure is narrowly construed. (*County of Los Angeles v. Superior Court* (2012) 211 Cal.App.4th 57, 63.)

Withheld Documents. Your letter dated September 8, 2017, states that “several” email chains were withheld pursuant to the attorney-client privilege and that two email chains were withheld because they would reflect or reveal the deliberative process between staff and management.

For the several email chains withheld pursuant to the attorney-client privilege, the County provides no information aside from its assertion of privilege. Please describe each email withheld pursuant to the attorney-client privilege, including the individuals sending or receiving the emails, the email’s date, the specific request from the Golden Door to which the email is responsive, and the basis for the privilege. In addition, please disclose whether any such emails have been shared with third parties, such as Newland Sierra, which may break any otherwise applicable privilege asserted by the County. Or, pursuant to Government Code section 6253, redact the portions of these records that the County asserts is privileged and produce the remainder of the document that is non-privileged, such as the email headers with factual information regarding the sender, addressees, cc’s, bcc’s, transmittal date and time, etc. Without such information, it is impossible for us to evaluate the County’s assertions of privilege with the information available to us.

For the two email chains withheld subject to the deliberative process privilege, a brief, conclusory, and insufficient description is provided. When asserting the deliberative process privilege, the burden is on the party asserting the privilege to establish the conditions for the

privilege. (See *Citizens for Open Gov't v. City of Lodi* (2012) 205 Cal.App.4th 296, 306; *Humane Society of U.S. v. Superior Court* (2013) 214 Cal.App.4th 1233, 1267.) Here, your September 8, 2017 letter describes that the two email chains withheld pursuant to the deliberative process privilege pertained to internal discussions regarding questions received from the public and a general policy statement about avoiding “chilling” staff’s communication. While we do not dispute the principles of this general policy statement about “chilling,” mere recitation of generally applicable policy is insufficient to invoke the deliberative process privilege. (*Citizens for Open Gov't, supra*, 205 Cal.App.4th at 307.) In addition, the deliberative process privilege is provided for senior public officials, not all levels of agency staff. (See *Regents of University of California v. Superior Court* (1999) 20 Cal.4th 509, 540.) The deliberative process privilege also is reserved for formulation of government policy, not any communication among or between staff members. (*Ibid.*).

Further explanation is required, and we request that for each withheld email you provide, at least, the individuals sending or receiving the emails, the email’s date, the specific request from the Golden Door to which the email is responsive, the question from the public being discussed, and a thorough description of the public’s interest in non-disclosure of each specific email in the importance CEQA places on public disclosure of information relating to a public agency’s environmental analysis. In addition, please disclose whether any such emails have been shared with third parties, such as Newland Sierra, which may break any otherwise applicable privilege asserted by the County. Or, pursuant to Government Code section 6253, redact the portions of these records that the County asserts is privileged and produce the remainder of the document that is non-privileged, such as the email headers with factual information regarding the sender, addressees, cc’s, bcc’s, transmittal date and time, etc. Without such information, it is impossible for us to evaluate the County’s assertions of privilege with the information available to us.

Redacted Document. In addition, the County redacted significant portions of an email chain between Mr. Oberbauer and County staff, which has been attached as **Attachment D**, including non-privileged information contained in the email headers. (See, e.g., California Civil Discovery Practice (4th ed Cal CEB) § 3.8 [“The privilege, however, protects only the content of the communication; it does not immunize the underlying facts from disclosure.”].) We are unaware of any privilege protecting the biologist’s communications with the County, and we ask that the County provide more detail on the basis for redacting the emails, including the factual information contained in the email headers. The basis for such redactions was not discussed in your letter of September 8, 2017. It appears that an attorney may be included on the email chain via a “gmail” account; therefore, more information is needed to understand any attorney-client relationship that may be implicated and how privilege is implicated for the redacted portions of the email chain. The County cannot properly claim a blanket privilege based on the mere inclusion of an attorney on the email.

Further, we do not believe the emails constitute a “deliberative process” because the biologist is not a member of the agency, nor is the County in the process of evaluating an action or making a decision. (Gov. Code §§ 6254(k), 6255; *Rogers v. Superior Court* (1993) 19 Cal.App.4th 469, 478 [citing *American Civil Liberties Union v. Deukmejian* (1982) 32 Cal.3d

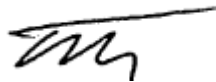
440, 447]; see also *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325, 1342.) The County must clarify its reasoning behind asserting the deliberative process privilege.

Moreover, we are concerned this email chain may have been shared with representatives of the Newland Sierra or other third parties that may break any otherwise applicable privilege, if one exists. We request the County to explain whether the emails have been shared with any third party and the basis for any assertion of the privilege with such parties.

Because these emails may contain important information regarding biological issues necessary for the public to adequately participate in the NC MSCP process and to understand the Newland Sierra DEIR's reliance on such information, please provide a response within 10 calendar days of the date of this letter. It has been nearly a year since the County asserted to us that evidence for the Newland Sierra project's inclusion in the NC MSCP indeed exists but, to date, no evidence to support that claim has been made available. Accordingly, if we do not hear back within a reasonable time period, please be advised that we are prepared to exercise our rights under Government Code sections 6258 and 6259 to judicial review of the propriety of the County's disclosure in this matter.

We thank you for your time and attention to this matter. Please do not hesitate to contact us should you have any questions or comments.

Sincerely,



Taiga Takahashi
LATHAM & WATKINS LLP

Cc (email):

Mark Wardlaw, County Planning and Development Services
Kathleen Flannery, County Planning and Development Services
Lisa Gordon, County Planning and Development Services
Mary Kopaskie, County Planning and Development Services
Mark Slovic, County Planning and Development Services
Ashley Smith, County Planning and Development Services
William W. Witt, Esq., Office of County Counsel
Claudia Silva, Esq., Office of County Counsel
William Pettingill, Esq., Office of County Counsel
Dan Silver, Endangered Habitats League
Laura Hunter, Wildlife and Habitat Conservation Coalition
Stephanie Saathoff, Clay Co.
Denise Price, Clay Co.
Christopher W. Garrett, Esq., Latham & Watkins LLP
Andrew Yancey, Esq., Latham & Watkins LLP

LATHAM & WATKINS LLP

Kathy Van Ness, Golden Door

Attachment A



County of San Diego

MARK WARDLAW
DIRECTOR

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June 5, 2017

Latham & Watkins LLP
Christopher W. Garrett
12670 High Bluff Drive
San Diego, CA 92130

RESPONSE TO "INVESTIGATION NEEDED INTO NEWLAND'S MISLEADING BACKROOM DEALING FOR ITS 'SIERRA' PROJECT AND POTENTIAL IMPLICATIONS FOR COUNTY STAFF"

Dear Mr. Garrett,

At the request of the County Board of Supervisors and Chief Administrative Officer Helen Robbins-Meyer, Planning & Development Services (PDS) is responding to your May 17, 2017 letter titled "Investigation Needed into Newland's Misleading Backroom Dealing for Its 'Sierra' Project and Potential Implications For County Staff."

Background

As you know, the County is currently processing an application submitted by Newland Sierra LLC for a proposed development project (Project) located north of Deer Springs Road, directly west of Interstate 15 in the North County Metropolitan Subregional Plan and Bonsall Community Plan areas, within unincorporated San Diego County. The Project includes a General Plan Amendment, Specific Plan, Rezone, and Tentative Map to subdivide approximately 1,985 acres into 2,135 dwelling units, 81,000 square feet of commercial space, a 6-acre school site, approximately 36 acres of public and private parks, 19 miles of trails and approximately 1,209 acres of biological open space. While the Project is located on a site similar to that on which the former Merriam Mountains project was proposed, it is a new application and includes a new project description.

County's Role in the Process

As the lead agency, PDS completes an independent evaluation of private land development applications, including the Project, for compliance with applicable County, State and Federal laws, regulations and ordinances. As such, PDS is not an advocate for or against the Project, but acts in an independent regulatory capacity as the lead agency for the Project. Based on its independent evaluation of the Project's compliance with applicable requirements, PDS will

formulate a recommendation for the Planning Commission and then the Board of Supervisors (Board) who has the ultimate authority to (i) certify or decline to certify an Environmental Impact Report (EIR) for the Project; and (ii) approve or deny the Project. In addition, and as described more fully below, during the processing of the Project by the County, there will be extensive opportunities for public review and comment, including input from the appropriate community/ sponsor group, public review and comment of the Draft EIR, and public hearings held by both the Planning Commission and the Board about the Project and the evaluation. This is in addition to the public EIR scoping meeting and Notice of Preparation (NOP) public review period that have already occurred for the Project.

As part of the County's independent evaluation of projects, PDS consults with other agencies which may have additional permitting authorities. Your letter raises concerns that PDS staff are included on emails between the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) (collectively referred to as Wildlife Agencies) and the applicant. However, it is common practice for the County, a project applicant, and the Wildlife Agencies to communicate where a project will require approvals and/or concurrence from both the County and the Wildlife Agencies. It is also standard practice for the County to elevate issues within an agency to pursue issue resolution. The County's role in communicating with other agencies does not include advocating or lobbying these agencies to approve projects. The County has not traveled to the USFWS Regional Office in Sacramento or to the USFWS office in Washington, D.C. on behalf of the project applicant to circumvent working with the local USFWS Carlsbad Office.

While the County facilitates the public input process and consults with outside agencies, it should be clarified that the Building Industry Association (BIA) is independent from the County. None of the analysis or determinations made by PDS were based on the BIA matrix nor did the County have any involvement in its preparation. Lastly, PDS recovers the full cost of services related to the processing land development permit applications through deposit accounts that are paid for by project applicants. PDS does not use public funds to process permit applications.

Public Participation in the Process

A Draft EIR is being prepared for the Project by the applicant and will be released for a 60-day public review and comment period. All public comments received during the comment period are responded to and included in a Final EIR to be presented to the Planning Commission and Board at noticed public hearings for consideration and action. The Project will also likely require permits from the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers and will, therefore, also likely undergo public review in accordance with the National Environmental Policy Act (NEPA).

Impacts to biological resources are studied as part of the California Environmental Quality Act (CEQA) and NEPA processes and appropriate mitigation is required to be provided. Through analysis of the biological resources onsite, it has been determined that the Project will result in impacts to Diegan coastal sage scrub (CSS) and result in the need for "take" of the California gnatcatcher, a federally listed threatened species. In accordance with the Endangered

Species Act (Act), there are currently three options for the Project to pursue take authorization for the California gnatcatcher including: (i) obtaining a Section 7 permit; (ii) obtaining a Section 10 permit; or (iii) through the issuance of and concurrence on a Habitat Loss Permit (HLP) in accordance with Section 4(d) of the Act, State Natural Community Conservation Planning (NCCP) Act Conservation Guidelines and Process Guidelines, and the County's HLP Ordinance implementing the 4(d) process. The applicant's pursuit of these permits requires the County's involvement with and determinations by the Wildlife Agencies.

Multiple Species Conversation Program – Draft North County Plan (Draft Plan)

The Project is also located within the planning area for the Multiple Species Conservation Plan – Draft North County Plan (Draft Plan), a regional multi-species Habitat Conservation Plan (HCP) and NCCP currently being prepared for consideration and approval by the Board and the Wildlife Agencies. Should the Draft Plan be approved, it would provide a fourth option for the Project to pursue take authorization for the California gnatcatcher.

As part of the effort to develop the Draft Plan, the County is conducting stakeholder outreach and engagement to gather input and feedback from interested parties as we work with the Wildlife Agencies to develop the Draft Plan. The County intends to release a public review of the Draft Plan and kick-off scoping for the environmental documentation process by the end of 2017, including the issuance of a NOP.

Currently, the County shows the Project site as a proposed “hardline” (preserve and development area defined) project within the Draft Plan. As was done in the previous public review of a prior iteration of the Draft Plan that was released in 2009, the anticipated public review of the Draft Plan will include supplemental information within an appendix that explains and justifies why certain projects were included as proposed hardlines. Information provided below indicates some of the rationale for including proposed hardline projects, which will be fully articulated in the public review of the Draft Plan that is anticipated for release at the end of 2017. It should also be noted that although the Wildlife Agencies accepted a hardline for the former Merriam Mountains project, this Project does not propose to revise or rely upon that hardline, but instead proposes a new hardline based on the current proposed Project.

In order for a project to be included as a hardline within the approved Multiple Species Conservation Plan – North County Plan (Final Plan), the project footprint to be developed and the footprint to be preserved, including any offsite mitigation areas, must be concurred upon by the Wildlife Agencies, the project proponent, and the County. While the Project is the only proposed project included within the current Draft Plan that has not yet received Board approval, inclusion of the Project in the Draft Plan does not, in any manner, indicate County support for the Project or provide the Project with an approval advantage. The Project will separately need Board approval as required by applicable laws and ordinances, and if it is denied by the Board or significantly revised, it will be removed or modified within the Draft Plan. In addition to the Board's required approval of the Project, the Wildlife Agencies will also need to approve take, either through the incidental take permit for the Final Plan or via one of the other options listed above.

The Project's inclusion in the Draft Plan reflects the County's view that the Project's proposed development footprint and open space preserve area should be considered within the conservation analysis for the Draft Plan but does not give the project any preferential treatment or eliminate any mitigation requirements. A fundamental piece of the Draft Plan will be a conservation analysis that forms the scientific basis upon which the Wildlife Agencies will base their biological opinions and findings in order to issue the County an Incidental Take Permit per the Act. The conservation analysis is currently in a working draft form that includes a preliminary analysis of potential impacts in the planning area, as well as an analysis of potential build-out of a preserve through mitigation, avoidance, and land acquisition. In order to complete this analysis, the County conducted an assessment of potential projects that are currently expected to occur within the planning area for the Draft Plan.

The main purpose of identifying projects and including them as proposed hardlines is so they can be properly incorporated in the conservation analysis of the Draft Plan. Inclusion of the Project as a proposed hardline does not exempt the project from or eliminate the need for the Project to provide mitigation for its biological impacts under either the Act or CEQA. In conducting the preliminary conservation analysis, County biologists believe that the open space design and future preservation of the 1,209 acres of land that the Project proposes complements the anticipated preserve and Pre-Approved Mitigation Area for the Draft Plan. As a result, the Project has been included in the Draft Plan and, to be included in the Final Plan, the Wildlife Agencies must concur. The Final Plan will also have to be approved by the Board.

The County appreciates your interest in the evaluation of the Project application and the formulation of the Draft Plan. You have been included on PDS's notification list to receive a notice of the availability of public review of the Draft EIR for the Project. We look forward to receiving additional comments from the Golden Door on the Draft EIR when it is released. If you have any questions about the Project, please contact the Project Manager, Ashley Smith at (858) 495-5375 or Ashley.Smith2@sdcounty.ca.gov or Planning Manager, Mark Slovick at (858) 495-5172 or Mark.Slovick@sdcounty.ca.gov.

Sincerely,



MARK WARDLAW, Director
Planning & Development Services

cc: County Board of Supervisors
Helen Robbins-Meyer, Chief Administrative Officer
Sarah Aghassi, Deputy Chief Administrative Officer
William Witt, County Counsel
Victor Avina, Policy Advisor, District 1
Adam Wilson, Policy Advisor, District 2
Jason Paguio, Policy Advisor, District 3

Christopher W. Garrett

June 5, 2017

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Adrian Granda, Policy Advisor, District 4
Melanie Wilson, Policy Advisor, District 5
Michael Fris, Assistant Regional Director, USFWS
Mendel Stewart, Field Supervisor, USFWS
Karen A. Goebel, Assistant Field Supervisor, USFWS
Ed Pert, South Coast Regional Manager, CDFW
Gail K. Sevens, Environmental Program Manager, CDFW
Andrew Yancey, Latham & Watkins
Dan Silver, Endangered Habitats League
Denise Price, Clay Co.
Doug Hageman, Newland
George Courser, Sierra Club San Diego
Kathy Van Ness, Golden Door
Laura Hunter, Wildlife and Habitat Conservation Coalition
Mark Dillon, Gatzke Dillon & Balance
Paul Robinson, Hecht Solberg Robinson Goldberg & Bagley
Stephanie Saathoff, Clay Co.
Bonsall Community Sponsor Group
Hidden Meadows Community Sponsor Group
Twin Oaks Valley Community Sponsor Group

Attachment B

Preliminary Comments on the Conservation Strategy Methodology by FWS for discussion at 4-13-17 meeting w/County

Document needs a summary of conservation policies and regulations (if there are any) and how those apply to assumptions regarding conservation analysis (e.g. wetlands, vernal pools, narrow endemics) – do any of these policies override potential impacts regardless of whether an occurrence is in or out of the PAMA

B.1.1 pp B-5: Private development impacts within the Permit Area should not be compared to impacts in the Plan Area, by definition the permit area is the area where all impacts will occur.

It is not clear from footnote on table B-1 and text on page B-6 whether or not the agriculture clearing is inclusive to the impacts for single-family homes/private development or is additive.

Pp B-6, exemptions up to 4500 ac of ag impacts with no mitigation; text states 2000 inside PAMA and 4500 outside PAMA which totals 8500 ac?

Covered Sp Analysis pp B-7: impacts to species est. for future discretionary private development and hardline projects...does not include County projects? Need to clarify/consistent use of the term discretionary private development projects vs single family homes

What is “sustainable species occurrences: replacing itself overtime? We need to be assessing core populations not just individual occurrences

B.1.3 (pp B-8) Not clear what the conservation objectives are based on ...a the proportion of natural vegetation, species habitat and occurrences...?

Species Observation (pp B-9): what are the timeframes of the observation data.

Species Occurrence (pp B-9): the use of the 0.25mi linear distance may not be appropriate for all species or all observations.

Pp B-10 description of the areas outside the Permit Area....verify that these areas were excluded from the analysis..(Gregory canyon to be put back in)

Pp B-12 how is County’s mitigation (for County projects, single family homes and agricultural) accounted for in estimating contribution to Preserve Assembly (will this be acquisition of new lands or use of existing County baseline lands?)

Table B-2 and B-3: May need to consider changing mitigation ratios, recommend that css mitigate in kind.

Vegetation Analysis (Based on review of overall methodology and then the specific analysis for Scrub)

Vegetation Community Conservation - Table B-4

- What is last row “various natural vegetation communities” include
- What about Agriculture – is there a targeted amount that needs to be conserved?

- Not clear how Avoidance Ordinance acreage was calculated – is this the steep slopes that will be avoided? Foot note refers to appendix B which is this document
- What is the difference between columns 6 “estimated acquisition...” and 7 “estimated additional conserved private land” which refers to a footnote that says these would be from “purchase of conservation easements”
- Estimated acquisition by public agencies is 20,860 – of this 10,708 are identified as mitigation for single family residence and 4,500 for agricultural expansion – Will the mitigation for County projects also be included in this column? If you do not account for county project mitigation, there still is only 5,652 identified to meet “nccp” standards or to be purchased by Wildlife Agencies

Please explain the basis for assuming that 10% will be avoided outside PAMA – It seems that the assumption of what will be avoided due to steep slopes would be the same regardless of whether it is in or out of PAMA

For each vegetation community –

- What does the acreage of the first table under important planning unit represent? If it is the PAMA/Preserve – why does it not always match the summary of the Veg 1B table – see santa margarita scrub 4,816 versus 5016 (the rest match for scrub – did not check other veg types) – Also, since planning units are limited to the PAMA/Preserve, it is awkward to track impacts versus conservation within planning units – It may make more sense to define planning units more broadly so that we can then evaluate impacts in a given area versus conservation.
- Can you expand the Veg 1B tables to include impacts by unit, similar to the conservation? Also, can you add a column that shows the total acreage to be conserved (i.e. Baseline+some percentage of PAMA+hardline)– location matters since not all units are important for specific species

Table B-5 Single family residence

- Need some assessment of where single family impacts will occur
- Estimated conservation for each vegetation type is not a required conservation objective, but the impacts were estimated by vegetation type? Need to get clarification
- Does the impact assessment (9,811) include lands that can subdivide and then invoke the exemption?
- County is committing to purchase 10,708 acres of habitat to mitigate for these impacts – is it in kind? How will it be tracked relative to the impacts – rough step? And where will it occur – same planning unit?
- Section 3.3.1 New Single family residential exemptions states that the allowances maybe exceeded for fire protection and reference to the fire MOU – this is an incorrect assumption – the fire MOU only addresses existing structures as of the date of the MOU (1997) – it does not cover new development.

Agriculture

- Need some assessment of where impacts are likely to occur

- Footnote 1 on table B-1 implies that County is committing to mitigate at a 1:1 ratio – will it be in kind? Within same unit? How will it be tracked?

Table B-6 and B-7: how were avoidance assumptions determined and how relates to the % avoided patch sizes; explain basis of assumptions..

Pp B-21. If avoidance of scrub habitat primarily occurs on steep slopes this strategy may be problematic for species analysis (eg if species does not prefer steep slopes such as the CAGN)

Table B-Veg1B: Are Tribal Lands in Fee excluded from the Planning Units?

Table B-Veg1E

- Footnote 2 states that it is assumed that 50% of small patches and 70% of med and large patches will be avoided within the PAMA – what is this based on, how will it be implemented – the reference to section 3.4.1 of the HCP does not provide any additional information
- If there is only 14,466 acres of scrub habitat within the PAMA as shown in the first column, how can the conservation objective in table B-Veg 1G be 17,500?

Table B-Veg1F

- If Table IE estimates that 6,059 acres of the PAMA have development potential – how does the County assure that only 1,842 acres will be impacted within the PAMA?

Table B-Veg1G

- Please clarify what the basis is for the total conservation objective – does this represent the goal that was put into the SITES model? 2010 analysis (table 16) had a goal of conserving 80% within PAMA which equaled 62% conservation in Plan Area for scrub
- Please explain footnote 1 – 8% of 8,407 does not equal 735 – also, what is the basis for assuming 8% and how is this different then the acquisition column?

Species Analysis – (did not evaluate goals, objectives, management or monitoring that is included in HCP – all of this is relevant to overall conservation analysis)

Assumption that there will be no impacts to baseline preserve species occurrence seems flawed in that there are covered activities that can occur there

Sustainable occurrences — “can replace itself over time within a particular geographic location within the Plan Area” - definition is too general, how do you define location, over what period of time – who decides

Core areas and core species populations should be identified as part of the conservation objectives and included in the analysis of impacts and conservation

Need some assessment of where single family and agricultural impacts will occur – if the only known occurrences will be impacted by these activities, offsetting measures may not be feasible

Table B-9 – vegetation communities too broad for some of the species

Dun skipper – delete grassland and make consistent with text in species section

San Diego button-celery – delete scrub, chaparral, grassland, meadow and seep

Spreading navarretia – delete scrub, chaparral, grassland, meadow and seep

Spadefoot – not sure any one veg community is appropriate – needs ponded water

SKR – should be grassland

Spineflower – soil is more relevant than veg community

Thornmint – soil is more relevant than veg community

Species Predictive Models – Not great for most species on covered species list – may work for more of the watch species list – probably ok for vp species, riparian species, horned lizard

For SKR, Gnatcatcher, ARTO, and spineflower need to use more refined models (some may have already been developed by others ie gnatcatcher model).

If the model is no good, then just explain why and then don't include in the text - Harbison's dun skipper, Hermes Copper, Western spadefoot toad,

golden eagle – may work for identifying foraging habitat, but nest sites and territories need to be addressed, more recent data should be available from USGS.

Table B-10 – for vernal pools, there are specific soils that support them in plan area (e.g. Placentia) – does parent material and texture capture this specificity?

Species Specific Tables (broad comments, not species specific)

- Can the dates of the occurrences be added to the “C” tables
- G tables – is assumption that all mitigation is just based on vegetation or for some species does occupancy need to be demonstrated?
- Can impact and conservation to be broken down by unit
- H tables – how will the acquisition track with impacts? Will specific vegetation or predicted habitat be targeted?
- Is there a summary table for each species – combine tables G and H in some fashion so reader can assess overall impacts and conservation

Issues to be clarified/resolved in order to do analysis

Permit area (take occurs) and Plan area (covered activities and conservation): do we need to differentiate for the purposes of this plan because impacts on conservation lands (within the Plan

Area) from management activities would not be covered if they are not within the Permit area. When using the term outside PAMA does this mean the Permit Area or Plan Area?

Does the conservation from the hardline projects functionally contribute to the Preserve?

Need an inventory and consensus on baseline preserve lands contribution to the Preserve (extent of recreation, fragmentation, other potentially conflicting uses; BLM MOU still valid; management and monitoring consistent with the Plan)

How to ensure distribution of conservation within Planning Units: vegetation target range; species core areas/occurrences.

Attachment C

-----Original Message-----

From: Oberbauer, Tom [mailto:Tom.Oberbauer@aecom.com]

Sent: Thursday, August 17, 2017 11:10 AM

To: Benham, Crystal <Crystal.Benham@sdcounty.ca.gov>; Eichar, Peter <Peter.Eichar@sdcounty.ca.gov>

Subject: FW: Species for North County Plan

From: Elias, Alexandra [mailto:Alexandra.Elias@sdcounty.ca.gov]

Sent: Monday, December 19, 2016 9:52 AM

To: Oberbauer, Tom

Subject: RE: Species for North County Plan

Tom, you're also doing the "project review" of the proposed Newland hardline for consistency with the Planning Agreement/NC Plan?

Thanks for all you're doing (the week before Christmas!!)

Alex

From: Oberbauer, Tom [mailto:Tom.Oberbauer@aecom.com]

Sent: Monday, December 19, 2016 9:47 AM

To: keoni.calantas@icfi.com <<mailto:keoni.calantas@icfi.com>>

Cc: Harris, Susan; Elias, Alexandra

Subject: Species for North County Plan

Hello Keoni:

Susan Harris is out sick. She has asked me to ask you to send me the species accounts as soon as you finish with them. If there are some that you don't think you will have time to work on, you can send those to me as well. I will have time to work on them today through Wednesday.

Thanks

Tom Oberbauer

Senior Scientist

Tom.oberbauer@aecom.com <<mailto:Tom.oberbauer@aecom.com>>

AECOM

401 West A Street, Suite 1200, San Diego, California 92101

619 610 7660

www.aecom.com <<http://www.aecom.com>>

Attachment D

From: [Oberbauer, Tom](#)
To: [Benham, Crystal](#); [Eichar, Peter](#)
Subject: FW: review of "hardline" project (attorney client confidential)
Date: Thursday, August 17, 2017 11:10:58 AM

-----Original Message-----

From: Slovic, Mark [<mailto:Mark.Slovick@sdcounty.ca.gov>]
Sent: Monday, December 19, 2016 5:10 PM
To: Oberbauer, Tom
Cc: Claudia Anzures; Smith, Ashley; Elias, Alexandra
Subject: Re: review of "hardline" project (attorney client confidential)

Thanks Tom. Yes let's plan on discussing at 9:30 tomorrow. If you're available in person that would be great, but we can also call you if that's easier just let us know. We will meeting with our Director in our Drake conference room if you plan to attend in person.

Thanks again,

Mark Slovic, Planning Manager
County of San Diego | Planning & Development Services T. 858.495.5172<tel:858.495.5172>

Sent from my iPhone

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From: Slovic, Mark [<mailto:Mark.Slovick@sdcounty.ca.gov>]
Sent: Monday, December 19, 2016 12:56 PM
To: Claudia Anzures; Smith, Ashley; Oberbauer, Tom
Cc: Elias, Alexandra
Subject: RE: review of "hardline" project (attorney client confidential)

Hi Tom and Claudia,

Sorry for not getting back to you sooner, but are you available tomorrow to discuss with our Director at around 9:30 or 10 am?

Thanks,

Mark Slovic, Planning Manager
County of San Diego | Planning & Development Services T. 858.495.5172

From: Claudia Anzures [<mailto:claudia.anzures@gmail.com>]
Sent: Thursday, December 15, 2016 1:22 PM
To: Smith, Ashley
Cc: Oberbauer, Tom; Slovic, Mark; Elias, Alexandra

Subject: Re: review of 'hardline' project (attorney client confidential)

I could meet on Tuesday morning.

I am out of town on Wednesday and Thursday next week.

Claudia Anzures

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CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

On Thu, Dec 15, 2016 at 1:11 PM, Smith, Ashley

<Ashley.Smith2@sdcounty.ca.gov<<mailto:Ashley.Smith2@sdcounty.ca.gov>>> wrote:

Hi Tom and Claudia,

I've been asked to set up a meeting for early next week to go over any feedback that Tom may have following his review. What is your availability Tuesday morning? If that doesn't work, what about Wednesday or Thursday?

Thanks,

Ashley

Ashley Smith, Land Use/ Environmental Planner COUNTY OF SAN DIEGO | Planning & Development Services
T. 858.495.5375<tel:(858)%20495-5375>

From: Oberbauer, Tom [<mailto:Tom.Oberbauer@aecom.com><<mailto:Tom.Oberbauer@aecom.com>>]

Sent: Wednesday, December 14, 2016 4:04 PM

To: Claudia Anzures

Cc: Smith, Ashley; Slovick, Mark; Elias, Alexandra

Subject: RE: review of 'hardline' project (attorney client confidential)

Hello Claudia:

I am going to think about it a bit more and provide more feedback on Monday if that is OK for the timeline.

Thanks

Tom Oberbauer

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From: Oberbauer, Tom [<mailto:Tom.Oberbauer@aecom.com>]

Sent: Wednesday, December 07, 2016 4:25 PM

To: Elias, Alexandra

Cc: Smith, Ashley; Slovick, Mark

Subject: RE: review of "hardline" project

That would work. By mail or delivery to my office? Since the office is not far from the County building, maybe you could have it brought to the receptionist by somebody who has to go to a meeting in the County building.

Thanks

Tom Oberbauer

From: Elias, Alexandra [<mailto:Alexandra.Elias@sdcounty.ca.gov>]

Sent: Wednesday, December 07, 2016 4:20 PM

To: Oberbauer, Tom
Cc: Smith, Ashley; Slovick, Mark
Subject: RE: review of 'hardline' project

Great, thanks. Right now we are planning to put it on a flash drive and get it down to you. Does that work?

From: Oberbauer, Tom [<mailto:Tom.Oberbauer@aecom.com>]
Sent: Wednesday, December 07, 2016 4:17 PM
To: Elias, Alexandra
Subject: RE: review of 'hardline' project

Hello Alex:

I can look at it on Monday.

Thanks

Tom Oberbauer
From: Elias, Alexandra [<mailto:Alexandra.Elias@sdcounty.ca.gov>]
Sent: Wednesday, December 07, 2016 2:14 PM
To: Oberbauer, Tom
Cc: Claudia Anzures (claudia.anzures@gmail.com<<mailto:claudia.anzures@gmail.com>>); Slovick, Mark
Subject: review of 'hardline' project

Tom:

We need to have a biologist that knows the NC plan look at a proposed hardline for a project to ensure that making findings can be made prior to including it in the Plan.

I believe we have the draft HLP findings and other bio info ready for review (Mark Slovick will confirm and send asap), but I wanted to make sure you could block out some time for this.

Thank you so much in advance.
Alex

Attachment E

COUNTY OF SAN DIEGO

CEQA CONSULTANTS LIST FOR PRIVATELY INITIATED PROJECTS

KEY FOR SUBJECT AREA ABBREVIATIONS

AG	AGRICULTURAL RESOURCES
AQ	AIR QUALITY
AR	ARCHAEOLOGICAL RESOURCES
BI	BIOLOGICAL RESOURCES
EP	EIR PREPARER
FP	FIRE PROTECTION PLANNING
GW	GROUNDWATER
HS	HISTORIC RESOURCES
MN	MINERAL RESOURCES
NO	NOISE
RP	REVEGETATION PLANNING
TT	TRANSPORTATION & TRAFFIC
VA	VISUAL ANALYSIS

Pursuant to the County CEQA Guidelines, Planning & Development Services (PDS) selects lists of individuals (not firms) that are approved to prepare CEQA documents for the County for privately initiated projects through a Request for Qualifications (RFQ) and selection process. Consultant lists are reestablished periodically. Applicants are responsible for selecting and direct contracting with specific consultants from the County’s list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant’s firm (if applicable) and County shall execute a Memorandum of Understanding (MOU) or similar agreement that addresses payment, communications, confidentiality of information, and report preparation and handling. Consultants that prepare CEQA documents for County initiated projects will continue to be selected through the standard County procurement processes.

CEQA CONSULTANTS LIST - AGRICULTURAL RESOURCES

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Chagala	James	Chagala & Associates	10324 Meadow Glen Way East	Escondido	CA	92026	760-751-2691	jchagala@hotmail.com
Domeier	Jennifer	RECON Environmental, Inc.	1927 Fifth Avenue	San Diego	CA	92101	619-308-9333	jdomeier@reconenvironmental.com
Greco	F. James	T&B Planning Consultants, Inc.	8885 Rios San Diego, Suite 227	San Diego	CA	92108	619-325-0290	jgreco@tbplanning.com
Marcin	Dennis	Helix Environmental Planning, Inc.	8100 La Mesa Boulevard, Suite 150	La Mesa	CA	91941	619-462-1515	dennism@helixepi.com
Shamlou	Shawn	Dudek & Associates	605 Third Street	Encinitas	CA	92024	760-479-4228	sshamlou@dudek.com
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Established March 9, 2007

Supplemented December 22, 2014

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Boparai	Poonam	Ascent Environmental, Inc.	455 Capitol Mall, Suite 300	Sacramento	CA	958144	858-354-4151	Poonam.Boparai@ascentenvironmental.com
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Byrne	Dana	PAN Environmental	11551 Corte Playa Las Brisas, Suite 110	San Diego	CA	92124	858-560-6585	dbyrne@panenvironmental.com
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Vander Pluym	Duane	Rincon Consultants, Inc.	790 East Santa Clara Street	Ventura	CA	93001	805-641-1000	duane@rinconconsultants.com
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Established March 9, 2007

Supplemented July 26, 2013

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Dice	Michael	Michael Brandman Associates, Inc.	621 E. Carnegie Drive, Suite 100	San Bernardino	CA	92408	909-884-2255	mdice@brandman.com
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Farrell	Jenna	Tetra Tech, Inc.	2969 Prospect Park Drive, Suite 100	Rancho Cordova	CA	95670	916-853-4575	jenna.farrell@tetrattech.com
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Gallegos	Dennis	Statistical Research Inc.	PO BOX 82404	San Diego	CA	92138	760-845-9364	dgallegos@sricrm.com
Garcia-Herbst	Arleen	Spindrift Archaeological Consulting	2449 Ardath Road	La Jolla	CA	92037	858-333-7202	arleen@spindriftarchaeology.com
Gardner	Jill	Jill K. Gardner & Associates, Inc.	1199 Pacific Highway, Suite 703	San Diego	CA	92101	619-876-1486	jill.k.gardner@gmail.com
Ghabhlain	Sinead Ni	ASM Affiliates, Inc.	2034 Corte Del Nogal	Carlsbad	CA	92011	760-804-5757	sinead@asmaffiliates.com
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Glenn	Brian	BonTerra Consulting Inc.	151 Kalmus Drive, Suite E-200	Costa Mesa	CA	92626	714-444-9199	
Gregory	Carrie	Statistical Research Inc.	4425 Juan Tabo Blvd. NE, Suite 112	Albuquerque	NM	87111	505-323-8300	cgregory@sricrm.com
Gross	G. Timothy	Ecology and Environment, Inc.	401 West A Street	San Diego	CA	92101	619-696-0578 x 4906	Ggross@ene.com
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Kyle	Carolyn	Kyle Consulting	PO BOX 640	Julian	CA	92036	760-765-2173	crkyle@aol.com
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McGinnis	Patrick	Tierra Environmental Services, Inc.	9915 Businesspark Avenue, Suite C	San Diego	CA	92131	858-578-9064	Pmcg1717@yahoo.com
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McLean	Deborah	LSA Associates, Inc.	20 Executive Park, Suite 200	Irvine	CA	92614	949-553-0666	debbie.mclean@lsa-assoc.com
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Driscoll	Arthur (Trey)	Dudek	605 Third Street	Encinitas	CA	92024	760-415-1425	tdriscoll@dudek.com
Jones	Jay	Environmental Navigation Servies, Inc.	PO BOX 231026	Encinitas	CA	92024		jwjones4@pacbell.net
Peterson	John	Peterson Environmental Services	5580 La Jolla Boulevard, Unit 398	La Jolla	CA	92037	858-454-9984	petersonenv@hotmail.com
Roff	Doug	AECOM	7807 Convoy Court, Suite 200	San Diego	CA	92111	858-300-2701	Douglas.Roff@aecom.com
Wiedlin	Matthew	Wiedlin & Associates, Inc.	PO BOX 910462	San Diego	CA	92191-0462	858-259-6732	mwiedlin@san.rr.com
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Established March 9, 2007

Supplemented May 5, 2016

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Collett	Russell		502 Glen Oaks Drive South	Alpine	CA	91901	619-794-7877	
Gregory	Carrie	EDAW, Inc.	1420 Kettner Boulevard, Suite 620	San Diego	CA	92101	619-233-1454	Carrie.Gregory@edaw.com
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Levanetz	Joel	Chambers Group, Inc.	9909 Huennekens Street	San Diego	CA	92121	619-850-2694	jlevanetz@chambersgroupinc.com
Manley	William	ASM Affiliates, Inc.	2034 Corte Del Nogal	Carlsbad	CA	92011	760-804-5757	wrmanley@asmaffiliates.com
May	Ronald	Legacy 106, Inc.	PO BOX 15967	San Diego	CA	92175	619-269-3924	legacy106inc@aol.com
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Pierson	Larry	Brian F. Smith and Associates	14010 Poway Road, Suite A	Poway	CA	92064	858-484-0915	pierarchaeo@bfsa-ca.com
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Established September 8, 2006

Supplemented December 22, 2014

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Established August 1, 2007

CEQA CONSULTANTS LIST - NOISE

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Established March 9, 2007

Supplemented May 5, 2016

CEQA CONSULTANTS LIST - REVEGETATION PLANNING

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Cherry	Thomas	Cherry Engineering	12721 Poway Road	Poway	CA	92064	858-679-3410	tcherry@cherryeng.com
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Established August 1, 2007

Supplemented July 26, 2013

CEQA CONSULTANTS LIST - TRANSPORTATION TRAFFIC

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Chen	Monique	Chen Ryan Associates	PO BOX 1062	La Jolla	CA	92038	619-318-4664	mchen@chenryanmobility.com
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Established September 8, 2006

Supplemented July 26, 2013

CEQA CONSULTANTS LIST - VISUAL ANALYSIS

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