



schaefer ecological solutions
regenerating nature

815 Madison Avenue
San Diego, CA 92116
619.991.8968
schaeferecology@cox.net
schaeferecology.com

**County Staff Received by Email
on 8/18/17**

August 18, 2017

Frank Everett Allen and Karen Lee Allen Revocable Trust
Attn: Frank Allen
27455 Alamendra
Mission Viejo, CA 92691

Subject: Biological Letter Report in of the Rancho Sueños Vineyards Project, Ramona, San Diego County, CA.

Dear Mr. Allen:

This letter presents the results of a biological assessment conducted by Schaefer Ecological Solutions (SES) on a 4.33-acre parcel (APN 277-110-46) off Rancho Sueños Drive in the community of Ramona in the County of San Diego, CA (Figure 1). The parcel is will be developed with a hand-planted vineyard. The report follows the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Biological Resources (2010), herein referred to as County Biology Guidelines; the County's Resource Protection Ordinance (RPO, 2011); and San Diego County Grading Ordinance (2012). It provides methods, surveys results and an assessment of impacts to County-identified sensitive biological resources for the above referenced project, as defined by the County of San Diego and applicable federal and state regulations. Figures are attached to the letter report (Attachment A).

Location and Planning Context

The 4.3-acre site is located at 7270 Rancho Sueños Drive, in the western end of the Ramona community in the Central Foothills Ecoregion of the unincorporated County of San Diego (Figure 1). The property is accessible via State Route 67 and Archie Moore Road (Figure 2), with the property center at coordinates 33 degrees 01 minutes and 37.09 seconds North (330137.09 N) and 116 degrees 57 minutes and 03.95 seconds West (1165703.95 W).

The site is surrounded by residential development and agricultural land uses. It is in the County's A-70 Zone with a Building Type Designator of "C", both of which allow for single-family detached residences. It is also located in close proximity to, but outside of the planned Pre-Approved Mitigation Area (PAMA), which delineates the Draft North County Multiple Species Conservation Plan (NCMSCP) preserve boundaries (Figure 3).

Project Description

An application has been submitted for an administrative permit for agricultural clearing of the Rancho Sueños property. The property owner proposes clearing 2.95 acres of the vacant 4.33 acre site for hand-planting of vines; the native vegetation around the fringes of the proposed vineyard will remain. Existing vegetation will be hand-cleared and vegetative materials will be ground up on site to be used as compost. The existing coast live oak (*Quercus agrifolia*) trees will remain as well as native vegetation outside of the planting area which will be retained as a vegetative buffer for the site. An area will also be cleared for a 12 foot wide decomposed granite driveway.

Small mechanical equipment will be used for the grading operation. There will be no import or export of soils. A small rip rap feature will be assembled on the site at the base of the graded pad for drainage purposes. There is no well on the property. Drip irrigation will be installed with a water hookup. Site clearing will avoid the migratory bird breeding season (February 15 through September 15).

Existing Conditions

The Project site is located in an interior valley of San Diego County within the Peninsular Range. The property elevation is approximately 1,436 feet above mean sea level (amsl). The site is relatively level with the exception of a small berm off the entrance from Rancho Sueños Drive. It is mainly occupied by scrub vegetation and grassland in the northern portion of the property. Site photos are included in Attachment B.

On a regional level, San Diego County has a Mediterranean climate, which is characterized by wet winters and dry summers. This is largely due to a semi-permanent high pressure zone that sits over the Pacific Ocean during much of the year. The nearest weather recording location (Ramona) has recorded an average annual precipitation of 16.4 inches and the average daily high and low temperatures are approximately 77.2 and 46.3 degrees Fahrenheit, respectively (www.usclimatedata.com).

The non-mafic soils of the site are characteristic of the Ramona scrub communities and do not contain wetlands soils. The southern half of the property contains Fallbrook-Vista sandy loams (15-30 percent slopes); the northern portion is made up of Fallbrook sandy loams (5-9 percent slopes) with a small strip of Fallbrook sandy loams (9-15 percent slopes) to the east (Figure 4).

Survey Methods

After review of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB) information of species that had been historically recorded within a 1-mile radius surrounding the site, Christina Schaefer, biologist with Schaefer Ecological Solutions, surveyed the property on foot on June 7, 2017. The survey was conducted in the early afternoon of a partly cloudy day with a light breeze at nine miles per hour (9 mph) and temperature of 70 degrees Fahrenheit.

The purpose of the site visit was to confirm project boundaries and current conditions and to characterize vegetation communities, detect or observe any potentially occurring sensitive habitats, including wetlands, or special-status species, as defined below, and to identify any mature trees that would provide nesting habitat to any species protected by the federal Migratory Bird Treaty Act (MBTA).

Vegetation communities and land cover types were visually inspected on the project site and a 100-foot buffer surrounding the site. The 100-foot buffer is entirely developed (residential and agricultural development and Rancho Sueños Drive) and was, therefore, not mapped; no sensitive species observations were observed or noted.

Data analysis was conducted pursuant to the County of San Diego Biology Guidelines and Resource Protection Ordinance (RPO). Survey limitations include diurnal and seasonal bias as surveys were conducted during the day (nocturnal species wouldn't be encountered) and, due to the project schedule, during the summer after the height of the blooming period when sensitive plants would be most detectable.

Survey Results

Vegetation and Flora

The Rancho Sueños property is occupied by common native and non-native plant species found in the vegetation communities described below. Vegetation communities were classified in accordance with the categories set forth in the suggested Oberbauer (2005) revisions to the Holland 1986 Descriptions of the Terrestrial Vegetation Communities of California for San Diego County. Five habitat types (four vegetation communities plus urban/developed) were mapped in the survey area (Figure 5). The site is characterized by a mix of disturbed habitat, non-native grassland, and southern mixed chaparral and includes oak species and a small area of sensitive coastal sage scrub habitat (see Attachment B). No wetlands or drainages subject to the County's RPO occur on the site. Vegetation communities in the study area are described below.

Diegan Coastal Sage Scrub (32520)

Diegan coastal sage scrub – Inland Form (CSS) is an endemic vegetation community and considered a sensitive habitat by local, state, and federal regulatory agencies primarily because it supports a number of state- and/or federally-listed as threatened or endangered vascular plant and wildlife species. CSS has lost much of its historic range to development and agricultural conversion. Constituent indicator species of CSS observed in the study area included California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), and black sage (*Salvia mellifera*) (Photos 1-3). High quality CSS occurs in the south-west corner of the property and occupies approximately 0.1 acre. The area between the high quality CSS and southern mixed chaparral is disturbed with a mixture of CSS species and non-native forbs and grasses. The area qualifies as disturbed CSS, which is treated as CSS by the County of San Diego pursuant to the County Biology Guidelines. The onsite CSS is not occupied by the federally threatened

California gnatcatcher (*Poliioptila californica californica*). Approximately 0.32 acre qualifies as disturbed CSS on the site. Therefore, a total of 0.42 acre of CSS exists on the site.

Granitic Southern Mixed Chaparral (37121)

Granitic southern mixed chaparral (SMC) is a fire-adapted vegetation community composed of broad-leaved sclerophyllous shrubs that can reach to ten feet in height and form dense stands with poorly developed understories. This vegetation community occurs on dry, rocky, often steep north-facing slopes with little soil. Species present on site include mountain mahogany (*Cercocarpus minutiflorus*), wild lilacs (*Ceanothus* sp.), chamise (*Adenostoma fasciculatum*), and laurel sumac (*Malosma laurina*) (Photos 4, 5). Two mature coast live oaks occur in this habitat onsite. Approximately 2.24 acres of SMC occurs within the central portion of the site.

Non-Native Grasslands (42200)

Non-native grassland (NNG) is present in the northern portion of the site and appears to be mowed. The constituent species present within NNG included a mixture of invasive annual grasses such as various bromes (*Bromus* spp.), and forbs such as black mustard (*Brassica nigra*), tocalote (*Centaurea melitensis*), and filaree (*Erodium cicutarium*) (Photo 6). NNG offers foraging habitat for sensitive raptor species such as eagles and hawks. Approximately 1.6 acres of NNG occur on the site.

Disturbed Lands (11300)

Disturbed lands/habitat consists of areas impacted by human activities such mowing. The area characterized as disturbed habitat on the site occurs outside of the fenced area and encompasses the driveway between the subject property and the property on the west side and areas along the fenced that are dominated by non-native forb species. The disturbed habitat on the site amounts to 0.05 acres.

Urban / Developed (12000)

Urban / developed areas within the study area include permanently impacted areas such as the entrance and access roads to the property (dirt road). Approximately 0.01 acre of area is developed.

Fauna

Fauna that occupies the site is consistent with wildlife typically found in chaparral scrub communities and non-native grasslands and in residential and agricultural communities. No fish or amphibians were observed as habitat for these species does not occur onsite. A variety of reptiles are expected to occur on the site, such as side-blotched lizard (*Uta stansburiana*), southern alligator lizard (*Elgaria multicarinata*), western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis melanoleucus*), and rattlesnakes, (*Crotalus* sp.).

Observed bird species include greater roadrunner (*Geococcyx californianus*), violet-green swallow (*Tachycineta thalassina*), bushtit (*Psaltiriparus minimus*), California towhee (*Pipilo crissalis*) and Pacific flycatcher (*Empidonax difficilis*). The project site is occupied by mature trees and shrubs that would

provide nesting habitat to migratory bird species protected under the federal MBTA. Under the MBTA, it is a federal offense to harm any migratory birds.

Mammal species observed include valley pocket gopher (*Thomomys bottae*), California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), and San Diego black-tailed jack rabbits (*Lepus californicus bennettii*). Other wildlife potentially occurring on the site include woodrat (*Neotoma* sp.), coyote (*Canis latrans*), raccoon (*Procyon lotor*), bobcat (*Lynx rufus*), and a variety of mouse species.

Sensitive Biological Resources

No sensitive (state or federally threatened, endangered or rare species), narrow endemic, or special-status plant species were observed in the study area at the time of the surveys. The survey was conducted during the breeding season of migratory bird species (February through September); no active nests were confirmed on the site. In addition, no federally designated critical habitat and/or wildlife movement corridors exist on the site; the site is surrounded by residential and agricultural development. Two individual San Diego black-tailed jackrabbits were observed. This species is on the County's Group 2 list and also on the NCMSCP Watch List.

Table 1. Listed Species with a Potential to Occur in the Vicinity of the Project Site¹

Latin Name	Common Name	Listing Status ²	County List	Potential to Occur
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	FE/--/NCMSCP	Group 1	None. Occurs in vernal pools
<i>Anaxyrus californicus</i>	Arroyo toad	FE/SSC/NCMSCP	Group 1	None. Occurs in riparian habitat open habitat surrounding sandy streams
<i>Phrynosoma blainvillii</i>	Coast horned lizard	--/SSC/NCMSCP	Group 2	Low. Occurs in open coastal sage scrub and chaparral.
<i>Poliophtila californica</i>	Coastal California gnatcatcher	FT/--/NCMSCP	Group 1	None. Occurs in coastal sage scrub over 0.4 acre in size
<i>Agelaius tricolor</i>	Tricolored blackbird	--/SE/NCMSCP	Group 1	None. Occurs in freshwater marsh and wetlands
<i>Taxidea taxus</i>	American badger	--/--/NCMSCP*	Group 1	Low. Occurs in open grassland with sandy loams
<i>Lepus californicus bennettii</i>	San Diego black-tailed jack rabbit	--/SSC/NCMSCP*	Group 2	Observed. Occurs in open chaparral, coastal sage scrub and grassland habitats.

¹ **Data Source:** The most recent versions of the following databases were queried within 1 kilometer of the survey area –ESP, SANDAG, CNDDB, SDNHM, USFWS, CDFW, and USFS.

² **Status:** The format for the species status is [federal status] / [state and/or CNPS status]. A double dash ("--") means that there is no official federal or state sensitivity status. Federal: FE – endangered, FT – threatened. State: SE – endangered, ST – threatened, SR – rare, SSC – special concern, FP – fully protected. NCMSCP – proposed to be covered by the NCMSCP (*indicates Draft Watch List).

Coastal California Gnatcatcher

The federally threatened California gnatcatcher (CAGN) has not been observed in the vicinity (CNDDDB 2016), and was not observed during the site visit. The CSS present onsite is too small to provide suitable nesting habitat for the species or function as a migratory stepping stone. CAGN have been reported to occur in patches of CSS as small as 0.4 acre in their coastal habitat; however, in its inland habitat, territory size increases to about 4 acres per breeding pair (Atwood et al. 1998, *Description of Population Size of California Gnatcatchers on the Palos Verdes Peninsula, 1993-1997*. Western Birds 29:340-350). The onsite CSS is fragmented and not connected to CSS patches that may occur in the region as the project site is surrounded by residential housing and agricultural land uses. Therefore, there is no potential for CAGN to occupy the site.

Impact Assessment

Vegetation Communities

The development of a hand-planted vineyard on about 60% of the 4.33-acre site would result in direct impacts to biological resources on the site (Figure 6). Clearing of the site would have direct, permanent impacts to approximately 2.6 acres of habitats, as detailed in Table 2. Direct, permanent impacts to County-sensitive habitats, including CSS (0.07 acre), SMC (1.35 acres) and NNG 1.18 acres) would occur. This is an incremental loss of habitats, including foraging habitat for wide-ranging raptor species. Despite the relatively small amount of habitat loss, mitigation will be required pursuant to the County's Biology Content Guidelines.

Table 2. Vegetation Communities and Impacts (Acres)

Holland Code	Vegetation Community	Acres in Study Area	Impact	Mitigation Ratio	Mitigation
32520	Diegan Coastal Sage Scrub	0.421	0.068	2:1	0.136
37121	Granitic Southern Mixed Chaparral	2.239	1.347	0.5:1	0.673
42200	Non-Native Grassland	1.610	1.180	0.5:1	0.590
11300	Disturbed Habitat	0.049	0.002	N/A	N/A
12000	Urban/Developed	0.012	0	N/A	0
Total		4.332	2.598		1.399

Fauna

No sensitive federally or state listed species would be impacted, and no wildlife movement corridor or federal designated critical habitat would be negatively affected by the project. The land for the vineyard would be cleared prior to the migratory bird breeding season (February 15 through September 15); the project would therefore be consistent with the MBTA. Direct impacts to foraging habitat for black-trailed jackrabbit could potentially occur from clearing of vegetation; however, the species uses

residential and agricultural properties and could potentially continue to use the vineyard and adjacent properties.

Land Use/Conservation Planning

The property is located just outside the Draft NCMSCP PAMA and is consistent with the County's habitat conservation planning, resource protection and Biology Guidelines. The NCMSCP has not yet been finalized or approved by the Wildlife Agencies. Impacts to CSS habitat outside an approved Natural Communities Conservation Plan (NCCP) require authorization under the County's Habitat Loss Permit (HLP) process (County of San Diego HLP Ordinance – Code of Regulatory Ordinances Section 86.100, 2004) for the conservation of the California gnatcatcher pursuant to Section 4(d) Rule of the Federal Endangered Species Act. However, due to the small size of CSS (less than 1 acre) and the extremely low potential for the California gnatcatcher to occupy the habitat (see above), the project fulfills the criteria for a De Minimus Exemption from the HLP Process.

Indirect Impacts

Indirect impacts could potentially occur through the use of fertilizers and pesticides if these chemicals would spread to neighboring wildlands. However, the site is surrounded by residential and agricultural uses. Therefore, the level of impacts is considered less than significant.

Significance Determination

The following significance criteria were assessed per the County of San Diego 4.0 Guidelines for Determining Significance, and other state of federal guidelines and regulations:

1. *A-E: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less Than Significant Impact – No sensitive species would be expected on the property and would be potentially impacted by the project except for the San Diego black-tailed jackrabbit, which was observed. This impact is considered less than significant because the species would continue to use the property and adjacent properties because habitat would be converted from native to agricultural rather than eliminated and the species could seek cover in the vineyard and continue to forage in the conserved perimeter of the project. No mitigation is required.

2. *A-E: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Potentially Significant Impact – Direct permanent impacts to vegetation communities identified as sensitive by the County, including Diegan coastal sage scrub, granitic southern mixed chaparral and

grassland (foraging habitat for raptors), are potentially significant as identified in the County's Biology Guidelines. Mitigation will be required (see below).

3. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?*

No Impact – No wetlands occur on the project site.

4. *A-F: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

No Impact – No wildlife movement corridors or nursery sites occur on the project site.

5. *A-L: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact – The project is consistent with the County's Biology Guidelines and RPO. All mature oak trees will be preserved and the breeding season for migratory birds would be avoided.

6. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?*

No Impact – The project is outside the PAMA of the NCMSCP. The NCMSCP has not yet been adopted by the County of San Diego.

7. *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact – The project is outside the PAMA of the Draft NCMSCP. While the NCMSCP has not yet been adopted by the County of San Diego, the project is nevertheless consistent with the Draft NCMSCP, the RPO, San Diego County Grading Ordinance and Biology Guidelines.

8. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

No Impact – No federally or state-listed species, or wetlands occur on the property. The project does not have the potential to jeopardize the continued existence of species or eliminate habitats or populations. No mitigation required.

9. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects.)*

No Impact – Impacts to sensitive habitats are minimal and mitigated below a level of significance. The property is outside the PAMA of the NCMSCP. Therefore, impacts are cumulatively less than significant.

Mitigation

Pursuant to San Diego County Biology Guidelines, mitigation for impacts to County-sensitive vegetation communities would be required as follows: impacts to CSS will be mitigated at a 2:1 ratio, and impacts to SMC and NNG at 0.5:1 ratio (Table 2). A total of 1.399 acres of in-kind or similar upland habitat would be conserved pursuant to County Report Format and Guidelines as follows:

Offsite mitigation to be purchased for biological impacts to non-Multiple Species Conservation Program (MSCP) lands must meet the following criteria: (1) Habitat to be acquired off site must be the same habitat type and/or comparable in biological function, (2) to the maximum extent feasible, the land must be located in the unincorporated area in the same ecoregion as the proposed project, and (3) the land must have equal or greater habitat value as the impacted resource, high or very high habitat value, and long-term viability.

Therefore, mitigation would be accomplished through the purchase of upland credits at a County approved mitigation bank, ideally within the unincorporated County in the same ecoregion (Central Foothills) as the subject property unless the deviations apply as detailed below.

The following County of San Diego-approved mitigation banks exist within the Central Foothills Ecoregion, within which the project is located:

1. San Vicente Conservation Bank (Poway): mitigation credits for NNG, CSS and SMC (CSS no longer available)
2. Crestridge Phase Conservation Bank (Lakeside): mitigation credits for CSS, SMC (CSS no longer available)
3. Willow Road Conservation Bank (Lakeside): mitigation credits for CSS, chamise chaparral.

Only one mitigation bank sells NNG credits (San Vicente). Therefore, it is not possible to locate at least two banks that sell NNG credits (see County Biological Guidelines below) and the project will mitigate impacts to NNG out of kind with SMC available at approved mitigation banks in the Central Foothills Region (either Crestridge or San Vicente).

CSS credits are no longer available at any of the above-referenced mitigation banks within the ecoregion; information about the Willow Road Conservation Bank is currently unknown. Therefore, CSS will be mitigated outside the ecoregion.

Mitigation for NNG and SMC

Pursuant to County Biology Guidelines, the following justification for out-of-kind mitigation applies:

1. *The biological function and value of the habitat used for mitigation is similar to that which was impacted*

The vegetation functional value of NNG and SMC are perceived similar by the County of San Diego as they are both assigned a 0.5:1 mitigation value. Onsite NNG and SMC both provide wildlife value to the black-tailed jackrabbit, a County sensitive species observed on the site.

2. *For non-native grassland habitats that have been created by past legal human activity, it may be appropriate to mitigate with the native habitat type that the land formerly supported. Use observed vegetation species as indicators of the probable pre-disturbance habitat. When no appropriate vegetation indicator species are present, use other evidence to determine the appropriate habitat. Such evidence may include, but not be limited to: aerial photographs, vegetation mapping information, historical biological reports or vegetation maps, and observed habitat on adjacent lands*

The northern tip of Rancho Sueños Property has been historically cleared and intensively used for agricultural purposes since historical photographs are available (1946). However, it is obvious from historic photos based on the adjacent habitat and the agricultural clearance patterns that the entire site was once occupied by homogeneous chaparral vegetation. Therefore, pursuant to County Biology Guidelines, the criterion is met.

3. *The land must have equal or greater habitat value as the impacted resource, high or very high habitat value, and long-term viability*

SMC consists of native vegetation communities, while NNG is mostly comprised of non-native plants; therefore, SMC would be considered of higher value than NNG. Furthermore, habitat conserved by an approved mitigation bank will be managed in perpetuity, thereby guaranteeing high habitat value and long-term viability.

Based on the above referenced justification for out-of-kind mitigation, the project will mitigate NNG with SMC at a ratio of 0.5:1. Consequently, the project will require 1.263 acres of SMC mitigation credits (NNG and SMC mitigation requirements combined) which will be met at the Crestridge Phase Conservation Bank within the Central Foothills Ecoregion.

Mitigation for CSS

As stated above, the required amount of 0.136 acre of CSS mitigation credits are no longer available at Central Foothills mitigation banks. Therefore, the project is required to mitigate outside the ecoregion in the neighboring ecoregion under the following County Biology Guidelines rationale:

If it is not possible to locate at least two banks or properties for acquisition under different ownerships that meet all of the biological and geographic criteria, staff would determine feasibility using the following measures, in the order listed, until two banks or properties for acquisition under different ownerships qualify:

The requirement that the habitat acquired be located within the same ecoregion may be waived. Habitat in the immediately adjacent ecoregions within the unincorporated area, with the appropriate habitat type and comparable biological function and value may be considered.

If two banks or properties for acquisition under different ownerships still do not qualify, the requirement that the habitat acquired be located within the unincorporated area may be waived. Habitat in adjacent cities (with a preference to be located within the same ecoregion) with the appropriate habitat type and comparable biological function and value may be considered.

Based on the above-referenced rationale, the project will mitigate all impacts at mitigation banks within the Northern Foothills Ecoregion, which is located north of and adjacent to the Central Foothills Ecoregion. The following mitigation banks area available within the Northern Foothills Ecoregion:

1. Daley Ranch Conservation Bank (Escondido): mitigation credits for CSS
2. Brook Forest Mitigation Bank (Valley Center): mitigation credits for CSS, NNG and MSMC
3. Heights of Pala Mesa Conservation Bank (Fallbrook): mitigation credits for CSS
4. Red Mountain Conservation Bank (Fallbrook): CSS, MSMC.

The project will mitigate for the 0.136 acre of CSS at the Daley Ranch Mitigation Bank in the City of Escondido. Although this bank is not in the unincorporated County, it is geographically closer to the project site than those banks in the unincorporated County listed above and, therefore, be ecologically and biologically more suitable as mitigation for CSS.

Conclusion

In summary, the project has significant direct permanent impacts to sensitive vegetation communities that require mitigation. The project is consistent with federal and state regulations and County of San Diego Biology Guidelines, RPO and Grading Ordinance. About 60 percent of the site would be cleared, which causes a permanent direct impact on approximately 2.6 acres of vegetation communities considered sensitive by the County, which would be mitigated through the purchase of 1.399 acres of upland habitat credits, specifically 1.263 acres of SMC at the Crestridge Phase Conservation Bank, and 0.136 acre of CSS at the Daley Ranch Mitigation Bank. No direct impacts to sensitive species would occur other than the habitat conversion of foraging habitat for the San Diego black-tailed jackrabbit, which is considered less than significant. The federally threatened California gnatcatcher has no potential to occur in the less than 1 acre CSS habitat onsite; therefore, a de Minimus Exemption from the County's HLP Process would apply.

pg. 12
Frank Allen
8/18/2016

I herewith certify that the information contained in this report adheres to all professional standards and provides a truthful assessment of the biological resources found on the site at the time of the survey. Please feel free to contact me with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christina Schaefer', with a stylized flourish at the end.

Christina Schaefer
President, Schaefer Ecological Solutions

Attachment A
Figures

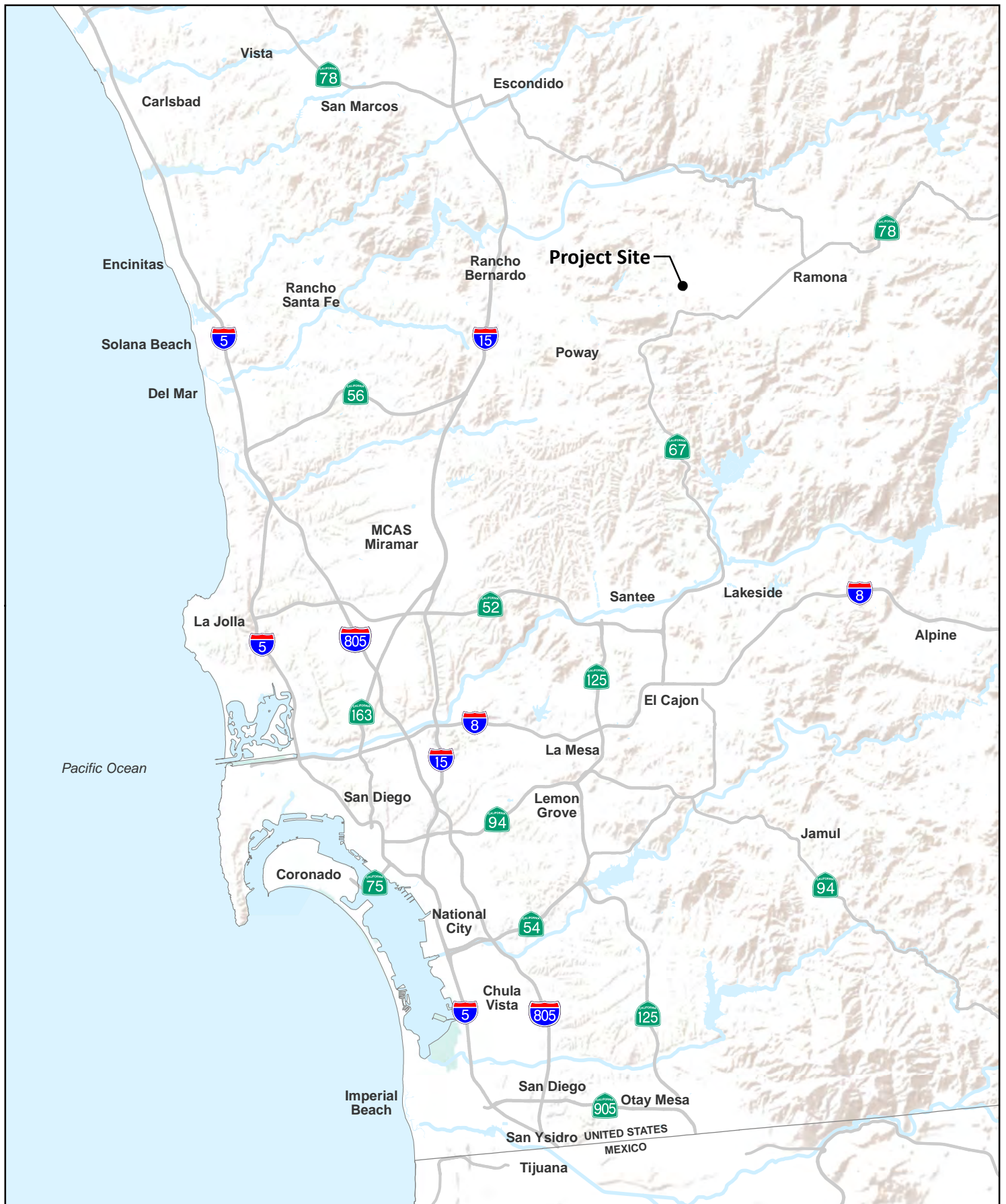


Figure 1



Project Location

RANCHO SUENOS VINEYARD



Figure 2

Project Vicinity

RANCHO SUENOS VINEYARD





Figure 3

Site Map

RANCHO SUENOS VINEYARD



○ Boundary

Soils

- CID2 - Cieneba coarse sandy loam, 5 to 15 percent slopes, eroded
- CmE2 - Cieneba rocky coarse sandy loam, 9 to 30 percent slopes, eroded
- FaC2 - Fallbrook sandy loam, 5 to 9 percent slopes, eroded
- FaD2 - Fallbrook sandy loam, 9 to 15 percent slopes, eroded
- FvE - Fallbrook-Vista sandy loams, 15 to 30 percent slopes

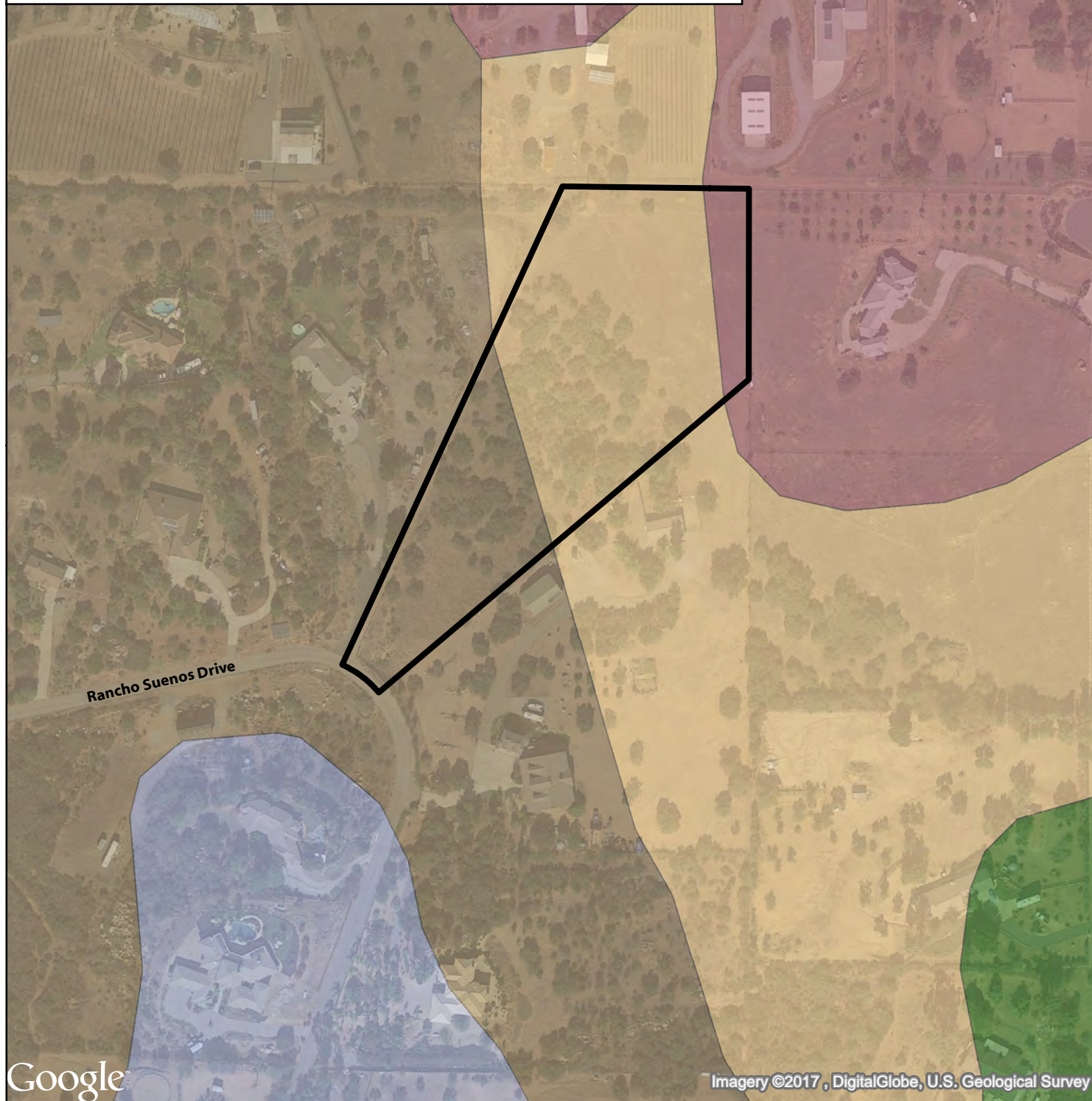


Figure 4

Soils

RANCHO SUENOS VINEYARD



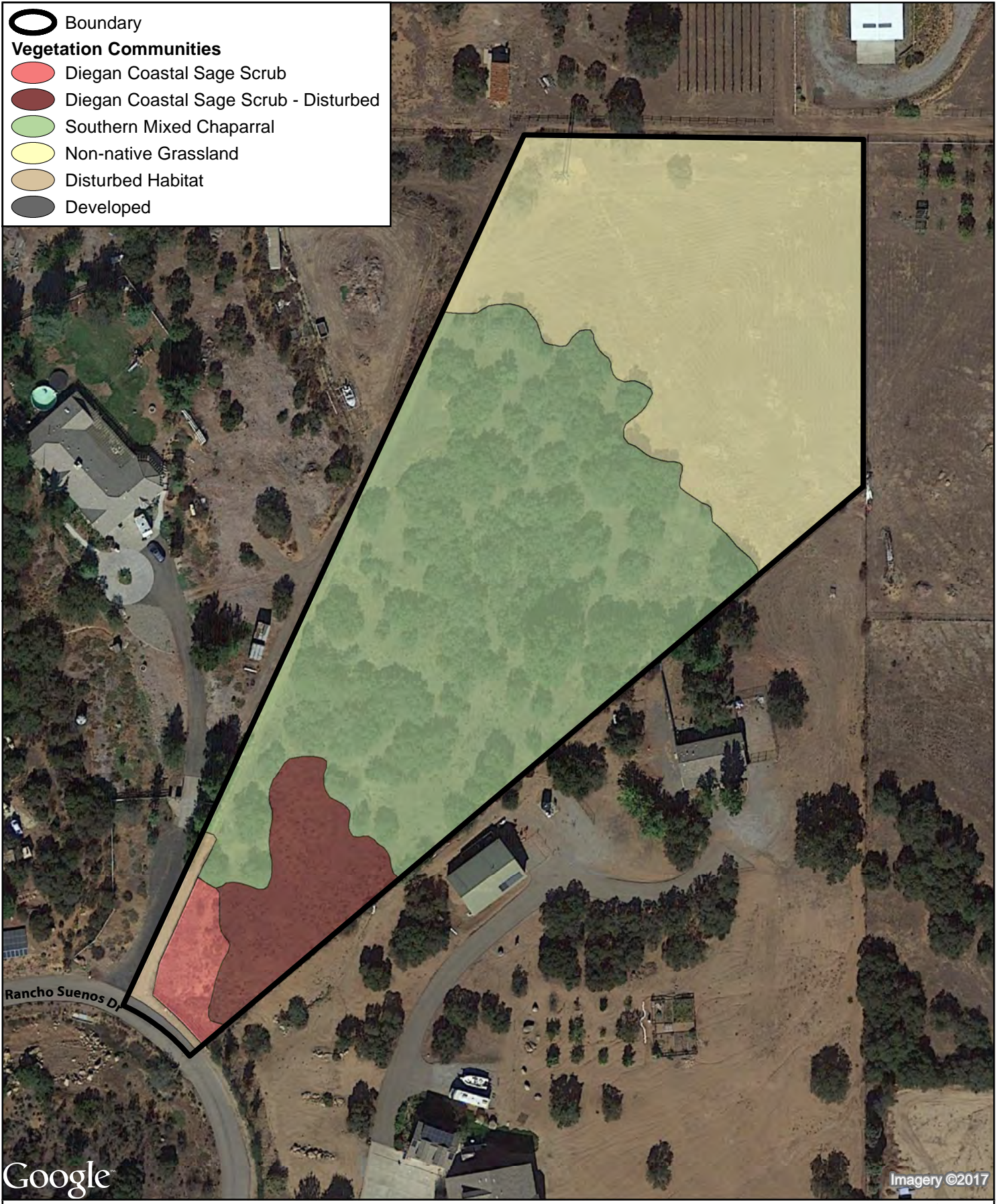
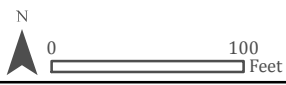


Figure 5



Vegetation

RANCHO SUENOS VINEYARD

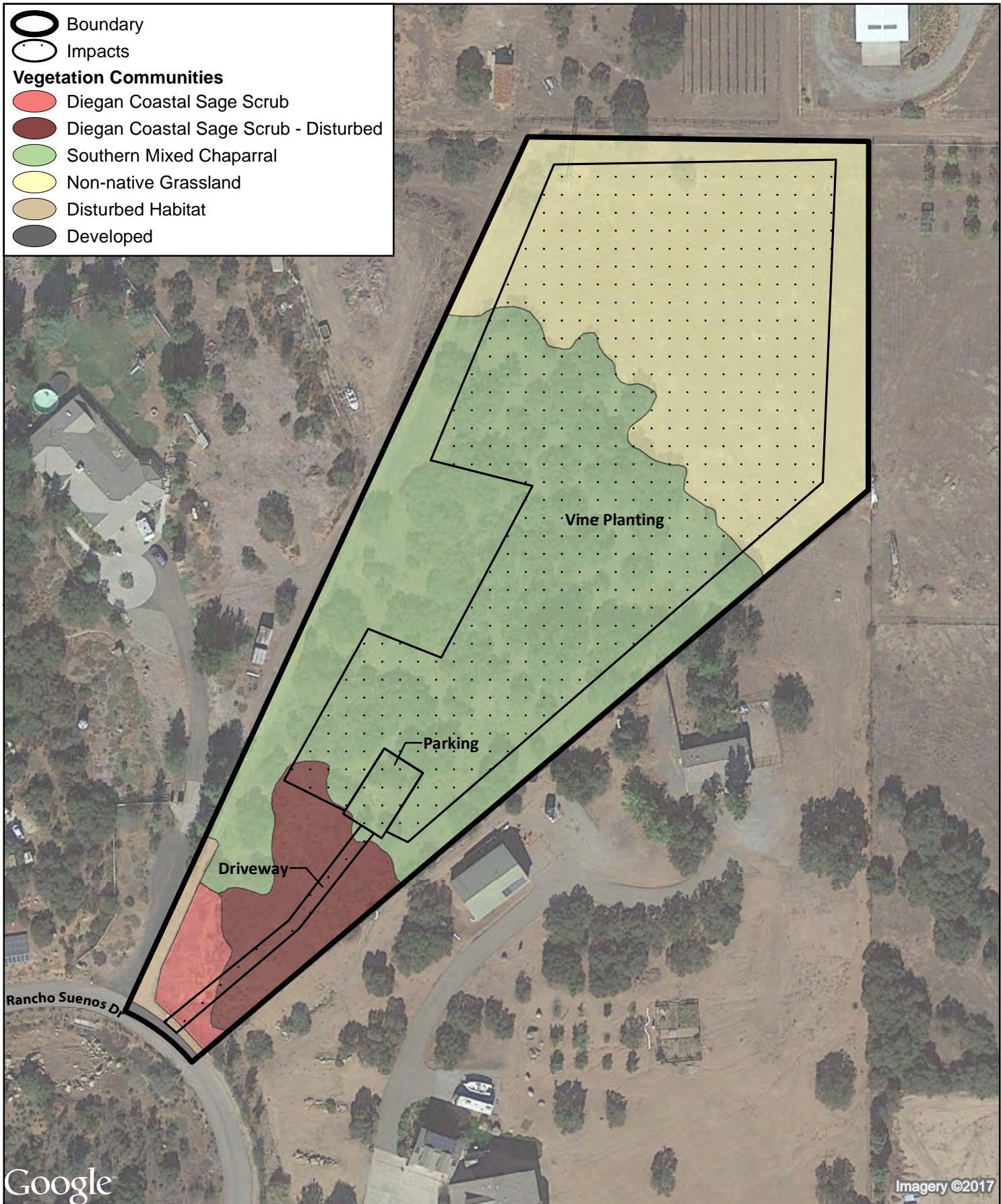


Figure 6

Attachment B
Photo Plate of Existing Site Conditions



Photo 1. Coastal Sage Scrub (CSS) elevated berm in the southern property, looking north-east



Photo 2. CSS, disturbed CSS, southern maritime chaparral (SMC) and non-native grassland (NNG), looking north-east



Photo 3. Disturbed CSS on the southern property, looking south-east



Photo 4. SMC and disturbed CSS (dominated by invasive species), looking north-east



Photo 5. Interface between SMC, disturbed SMC and NNG, looking east



Photo 6. NNG in the northern portion of the property, looking south