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May 27, 2025

**RE: Biological Resource Letter Report Biological Scoping; Record ID: PDS2022-LDGRMJ-30446; APN 267-147-06-00; Trust Account Number: 2226306-D-09909**

The following Biological Resource Letter Report analyzes project related impacts for a single-family residence located within the County of San Diego, California (Figure 1). The proposed project is specifically located west of Camino Del Sur, north of Artesian Road and south of Top of Morning Way (Figure 2). Furthermore, the study parcel (Assessor Parcel Number (APN) 267-14-706-00) is in a Minor Amendment area of the County's Multiple Species Conservation Program (SC MSCP).

### **SUMMARY**

The proposed project consists of a single-family home located in unincorporated lands within the County of San Diego.

The study area (project parcel and a 100-foot buffer) contains Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, non-native grasslands, riparian scrub, eucalyptus woodland, disturbed habitat, and developed lands. The project will impact 1.73 acres which includes approximately 1.53 acres of disturbed and undisturbed Diegan coastal sage scrub, 0.07-acre of riparian scrub, 0.6-acre of non-native grassland and 0.03-acre of eucalyptus woodland. The project will impact suitable habitat for two special-status species, including Cooper's Hawk and California adolphia. Direct impacts will not occur to jurisdictional wetlands or waterways, or sensitive wildlife corridors. Mitigation for habitat impacts will be achieved by conserving habitats at an off-site mitigation parcel and by purchasing mitigation credits at an approved County of San Diego mitigation bank. Impacts to 18 California adolphia plants will be mitigated through preservation of 44 individuals at the off-site mitigation parcel.

Please note, clearing of vegetation within on-site areas represents a potentially significant impact to nesting birds if the removal vegetation occurs during the nesting bird season. As a mitigation measure for this potential impact, if any construction work is proposed to occur during the County of San Diego migratory bird or raptor breeding season (February 1 through August 31), a qualified biologist will be required to conduct a bird and raptor survey no more than three days prior to scheduled operations to ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum of 300 feet for migratory bird species and 500 feet for raptor species, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the young have fledged and will not be impacted by the project. This will reduce the potential impact to below a level of significance.

## **INTRODUCTION, PROJECT DESCRIPTION, LOCATION AND SETTING**

### **Project Description**

The proposed project consists of one single family residence, associated hardscape features, and ornamental landscaping. Implementation of the project will include clearing of vegetation, grading, installation of leach lines, retaining walls, and the construction of a driveway. The project does not propose any off-site impacts.

### **Project Location**

The proposed project is located within the SC MSCP planning area of the County of San Diego (California). Specifically, the proposed project is located west of Camino Del Sur, north of Artesian Road and south of Top of Morning Way (Figure 2).

### **Project Setting**

The study area, which comprises the proposed project site and a 100-foot buffer, contains primarily undeveloped lands dominated by Diegan coastal sage scrub and non-native grassland habitat. The study area is accessible via Caminito Del Vientecito and is also located on the Rancho Santa Fe USGS 7.5' Quadrangle (Figure 2). The approximate elevation range of the study area is from 400 feet above mean sea level (AMSL) to 460 feet AMSL. The study area slopes moderately from the high point in the southwestern corner to the low point in the northeastern corner of the study parcel. Two soil types occur on-site, each from the Huerhuero loam soil complex (Huerhuero loam, 15 to 30 percent slopes, eroded; Huerhuero loam, 2 to 9 percent slopes).

### **SITE SURVEY**

Klutz Biological Consulting (KBC) biologist Korey Klutz conducted a general biological resources survey on August 25<sup>th</sup>, 2023. The survey was conducted between the hours of 1000 and 1200, respectively. Conditions during the survey consisted of partly cloudy skies and a temperature of approximately 66 degrees Fahrenheit (F) with winds from 1 mile per hour. The survey was conducted by slowly walking meandering transects within the study area and recording all plants and wildlife species observed. A search of the California Natural Diversity Database was also conducted to identify sensitive species known to occur in the general vicinity of the project site. Although the entire project area was surveyed, some sensitive resources may not have been detected due to the timing and duration of the survey events. Specifically, wildlife species that are not active during the day (e.g. strictly nocturnal), that are secretive in their habits, or that use the site only periodically like during nesting may not have been detected during the survey.

Mapping was performed following the Biological Resource Mapping Guidelines within the Report Format and Content Requirements: Biological Resources (County of San Diego 2010). Wildlife was identified directly by sight or by vocalizations, and indirectly by scat, tracks, or burrows. Field notes were maintained throughout the surveys. The primary focus of the general survey was to document and map the size, location, and general quality of all habitat types and to determine the presence or potential presence of any sensitive resources (plant or wildlife) on-site. Nomenclature for this report conforms to Hickman (2014) for plants, Holland (1986) and Oberbauer (2008) for plant communities and habitat types, American Ornithological Union (AOU 1998 and 2000) for birds, Jennings (1983) and Stebbins (2003) for reptiles and amphibians, Jones (1992) for mammals, and Powell (1979) for insects.

Following the general biological survey of the site, focused surveys were conducted in the spring and summer of 2024 (Appendix A). Focused surveys completed included protocol presence/absence United States Fish and Wildlife Survey (USFWS) coastal California gnatcatcher (*Poliioptila californica*) surveys, focused surveys for Crotch's Bumble Bee (*Bombus crotchii*), special status rare plant surveys and an assessment for vernal pools. Appendix A details the date, type and survey conditions for all surveys conducted in support of the proposed project.

### **Biological Resources Present**

This section presents the results of the site survey, and the regional context of the biological resources observed or that have the potential to occur on-site. The study area contains four landcover types including disturbed Diegan coastal sage scrub, non-native grassland, disturbed habitat, and urban/developed lands.

### **Regional Biological Context**

The project is located within the SC MSCP. Specifically, the site is mapped as occurring within a Minor Amendment Area and development on-site will be subject to the County's BMO (Figure 3). However, please note that the study area does not qualify as a Biological Resource Core Area (BRCA) as defined by the County's BMO.

### **Habitats and Vegetation Communities**

The following is a summary of the existing habitats and vegetation communities. Habitat types within the study area are comprised primarily of lands that have been previously disturbed. A discussion of each landcover or habitat type observed within the study area is provided below. A list of all plant species observed during the field survey is provided as Appendix B.

#### **Diegan Coastal Sage Scrub (32500) (Tier II)**

Diegan coastal sage scrub consists predominantly of low- growing, aromatic, and generally soft-leaved shrubs. Diegan coastal sage scrub is a native plant community characterized by soft, low, aromatic shrubs and subshrubs characteristically dominated by drought-deciduous species. This community typically occurs on sites with low moisture availability, such as dry slopes and clay-rich soils that are slow to release stored water. The representative species in this habitat type are California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), and laurel sumac (*Malosma laurina*).

On-site this habitat consists of a mixture of undisturbed and disturbed stands of primarily black sage, white sage (*Salvia apiana*), California buckwheat and California sagebrush. Overall shrub density and cover is low to moderate. Areas between shrubs are primarily comprised of small boulders/rock outcrops and non-native grasses with sparse native annual cover. Approximately 1.53 acres of disturbed and undisturbed Diegan coastal sage scrub occurs on-site.

#### **Non-native Grassland (42200) (Tier III)**

This habitat type is characterized by a dominance of annual grass species as well as annual native forbs in years with adequate rainfall. Areas mapped as non-native grassland are dominated by non-native plant species comprised primarily by cultivated oat (*Avena sativa*), ripgut grass (*Bromus diandrus*), Russian thistle (*Salsola tragus*), field bindweed (*Convolvulus arvensis*), and redstem filaree (*Erodium cicutarium*). Smaller amounts of black mustard (*Brassica nigra*), Asian mustard (*Brassica tournefortii*), London rocket (*Sisymbrium irio*), dwarf mallow (*Malva neglecta*), and Bermuda grass (*Cynodon dactylon*) were also observed. Approximately 0.6 acre of non-native grassland habitat occurs on-site.

#### Riparian Scrub (63310) (Tier I)

Riparian scrub is a depauperate, tall, herbaceous riparian scrub dominated by mule fat and sparse to low cover of willow species (*Salix leavigata*, *Salix goodingii*, & *Salix lasiolepis*). Within the study area, this community occurs in one location along the eastern portion of the property and is associated with an ephemeral drainage. Approximately 0.07-acre of riparian scrub habitat occurs on-site.

#### Disturbed Habitat (11300) (Tier IV)

Disturbed land includes areas in which the vegetative cover comprises less than 10 percent of the surface area (disregarding natural rock outcrops) and where there is evidence of soil surface disturbance and compaction from previously legal human activity; or where the vegetative cover is greater than 10 percent, there is soil surface disturbance and compaction, and the presence of building foundations and debris (e.g., irrigation piping, fencing, old wells, abandoned farming or mining equipment) resulting from legal activities (as opposed to illegal dumping). Vegetation on disturbed land (if present) will have a high predominance of non-native and/or weedy species that are indicators of surface disturbance and soil compaction, such as Russian thistle (*Salsola tragus*), telegraph weed (*Heterotheca grandiflora*), horehound (*Marrubium vulgare*), and sow-thistle (*Sonchus oleraceus*).

Disturbed habitat occurs off-site only within the 100-foot survey buffer. These areas appear to be associated with brush management zones that are maintained for wildland fire suppression.

#### Eucalyptus woodland (11100) (Tier IV)

A grove of mature eucalyptus trees occurs in the western portion of the property. This woodland is moderately dense and could support nesting raptor species. Approximately 0.1-acre of Eucalyptus woodland occurs on-site.

#### Urban/Developed (12000) (Tier IV)

Within the study area urban/developed lands includes existing residential dwellings, patio structures, hardscape features, dirt roads and as well as paved roads. Within this landcover type, ornamental vegetation also occurs. All areas mapped as urban/developed are routinely maintained and contain limited biological value. However, mature ornamental trees that occur in this landcover do provide some cover and nesting opportunities for wildlife species. Urban/Developed areas only occur within the study area buffer.

#### **General Wildlife Observations**

During the site surveys 44 wildlife species were documented including thirty-two birds, two mammals, one lizards, four butterflies and four bumblebee species. Common species observed included, yellow faced bumblebee (*Bombus vosnesenskii*), Common raven (*Corvus corax*), House finch (*Haemorhous mexicanus*), Song sparrow (*Melospiza melodia*), California towhee (*Melospiza crissalis*), and Lesser goldfinch (*Spinus psaltria*). Of note, one foraging Crotch's bumblebee (*Bombus cortchii*) and one Cooper's Hawk (*Accipiter cooperi*) was observed flying overhead. No other sensitive wildlife species were observed. A list of all wildlife species observed during the field survey is provided as Appendix C.

#### **Special Status Species**

The following is a summary of all sensitive species with potential to occur on the site or on land immediately adjacent to the project area. Sensitive or special status plant and wildlife species and habitats are those that are considered rare, threatened, or endangered within the state or region by local, state, or federal resource conservation agencies. Sensitive species are so called because of their limited distribution, restricted habitat requirements, susceptibility to human disturbance, degradation due to development or invasion by non-native species, or a combination of these factors.



The following were used in the determination of sensitive biological resources: U.S. Fish and Wildlife Service (USFWS) (2007, 2010); California Department of Fish and Game (CDFG) (2009, 2010a, 2010b, 2010c), County Sensitive Plant and Animal list (County 2010), County of San Diego Biology Scoping Letter, California Native Plant Society (CNPS) online inventory (2020), and the California Natural Diversity Database (CNDDB 2020).

### **Sensitive Plants**

Based on the literature search conducted prior to the field survey seventeen special status plant species were identified as potentially occurring within the general project vicinity including San Diego Thornmint (*Acanthomintha ilicifolia*), California adolphia (*Adolphia californica*), Shaw's agave (*Agave shawii*), Aphanisma (*Aphanisma blitoides*), south coast saltbush (*Atriplex pacifica*), golden snake cholla (*Bergerocactus emoryi*), seaside calandrinia (*Calandrinia maritima*), Lewis sun cup (*Camissonia lewisii*), southern tarplant (*Centromadia parryi australis*), Orcutt's spineflower (*Chorizanthe glabriuscula orcuttiana*), prostrate spineflower (*Chorizanthe procumbens*), sea dahlia (*Coreopsis maritima*), San Diego sand aster (*Corethrogyne filaginifolia incana*), San Dieguito sand aster (*Corethrogyne filaginifolia linifolia*), western dichondra (*Dichondra occidentalis*), San Diego button celery (*Eryngium aristulatum prishii*), cliff spurge (*Euphorbia misera*), coast barrel cactus (*Ferocactus viridescens*), Orcutt's hazardia (*Hazardia orcuttii*), graceful tarplant (*Holocarpha virgata elongata*), mesa horkelia (*Horkelia cuneata puberula*), decumbent goldenbush (*Isocoma menziesii decumbens*), San Diego marsh elder (*Iva hayesiana*), Robinson's pepper grass (*Lepidium virginicum robinsonii*), California box-thorn (*Lycium californicum*), small flowered microseris (*Microseris douglasii platycarpha*), willowy monardella (*Monardella linoides viminea*), California spine flower (*Mucronea californica*), San Diego goldenstar (*Muilla clevelandii*), little mousetail (*Myosurus minimus apus*), spreading navarretia (*Navarretia fossalis*), prostrate navarretia (*Navarretia prostrata*), California adder's tongue fern (*Ophioglossum californicum*), snake cholla (*Opuntia parryi serpentina*), golden-rayed pentachaeta (*Pentachaeta aurea*), Brand's phacelia (*Phacelia stellaris*), Cooper's rein orchid (*Piperia cooperi*), mesa club moss (*Seleginella cinerascens*), and San Diego sunflower (*Vieguiera laciniata*) (CNDDB 2024, County of San Diego 2023).

Focused rare plant surveys detected one special status plant species on-site. A population of approximately 18 California adolphia (*Adolphia californica*; County List B) shrubs were observed and mapped within the northeastern portion of the property (Figure 3). This population is located outside of the proposed development and will not be directly impacted by the proposed project. No other special status rare plant species were detected during the field survey, and none are considered to have high potential or likely to occur on-site (Appendix D).

### **Sensitive Wildlife**

Sensitive or special status wildlife species are those that are considered rare, threatened, or endangered within the state or region by local, state, or federal resource conservation agencies. Sensitive species are so called because of their limited distribution, restricted habitat requirements, or susceptibility to human disturbance, or a combination of these factors.

Wildlife species identified during the literature search as potentially occurring on-site included: Cooper's hawk (*Accipiter cooperi*), Sharp-shinned hawk (*Accipiter striatus*), Rufous-crowned sparrow (*Aimophila ruficeps canescens*), Tricolored blackbird (*Agelaius tricolor*), Rufous-crowned sparrow (*Aimophila ruficeps canescens*), Grasshopper sparrow (*Ammodramus savannarum*), Bell's sage sparrow (*Amphispiza belli belli*), Silvery legless lizard (*Anniella pulchra pulchra*), Pallid bat (*Antrozous pallidus*), Great blue heron (*Ardea herodias*), Short-eared owl (*Asio flammeus*), Burrowing owl (*Athene cunicularia hypogea*), San Diego fairy shrimp (*Branchinecta sandiegoensis*), Canada goose (*Branta canadensis*), Dulzura California pocket mouse (*Chaetodipus californicus femoralis*), Northwestern San

Diego pocket mouse (*Chaetodipus fallax fallax*), Coastal rosy boa (*Charina trivirgata roseofusca*), Mexican long-tongued bat (*Choeronycteris mexicana*), Northern harrier (*Circus cyaneus hudsonius*), Orange-throated whiptail (*Cnemidophorus hyperythrus*), Coastal western whiptail (*Cnemidophorus tigris multiscutatus*), Yellow-billed cuckoo (*Coccyzus americanus occidentalis*), San Diego banded gecko (*Coleonyx variegatus abbottii*), Northern red diamond rattlesnake (*Crotalus ruber ruber*), Monarch butterfly (*Danaus plexippus*), San Diego ringneck snake (*Diadophis punctatus similis*), Black-shouldered kite (*Elanus caeruleus*), Horned lark (*Eremophila alpestris actis*), Coronado skink (*Eumeces skiltonianus interparietalis*), Greater western mastiff bat (*Eumops perotis californicus*), Merlin (*Falco columbarius*), Prairie falcon (*Falco mexicanus*), American peregrine falcon (*Falco peregrinus anatum*), Mountain lion (*Felis concolor*), Loggerhead shrike (*Lanius ludovicianus*), California gull (*Larus californicus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), California lindellaria (*Linderiella occidentalis*), Coastal giant skipper (*Megathymus yuccae harbisoni*), San Diego desert woodrat (*Neotoma lepida intermedia*), Big free-tailed bat (*Nyctinomops macrotis*), Pocketed free-tailed bat (*Nyctinomops femorosaccus*), Southern mule deer (*Odocoileus hemionus*), Robinson's beetle (*Phobetus robinsoni*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), Bank swallow (*Riparia riparia*), California gnatcatcher (*Poliophtila californica*), Coast patch-nosed snake (*Salvadora hexalepis virgulata*), Western spadefoot toad (*Scaphiopus hammondi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and American badger (*Taxidea taxus*).

These species have the potential to occur because they have been previously identified in close proximity to the project site. During on-site field surveys, two special status wildlife species were observed including Crotch's bumble bee (*Bombus crotchii*) (CBB) and Cooper's hawk. A discussion of these species and California gnatcatcher is provided below. No other special status wildlife species were observed or are considered to have a high potential occur on-site (Appendix D).

California gnatcatcher (*Poliophtila californica californica*) Status: Federally Threatened, California Species of Concern, County Group 1

The County's scoping letter requested focused presence/absence surveys be conducted for the California gnatcatcher. These surveys were performed by Antonette Gutierrez in accordance with USFWS service protocol (Appendix E). Three surveys were conducted in the months of March and April of 2024 and the results were negative for the presence of CAGN on-site. Overall habitat quality for the California gnatcatcher was determined to be of low quality and the site is unlikely to support this species.

Crotch's bumble bee (CBB) Status: Candidate Listing under the State Endangered Species Act

On October 16, 2018, the Xerces Society for Invertebrate Conservation (Xerces) filed a petition with the California Fish and Game Commission to list CBB, along with four other native bumble bee species, as endangered under the California Endangered Species Act (CDFW 2018). The species had previously been listed as endangered in 2008 on the International Union for the Conservation of Nature Red List of Threatened Species (Xerces et al. 2018). Once a species is considered a candidate for listing under the California Endangered Species Act, it receives the same level of protection afforded listed species until the time a listing determination is made by the California Fish and Game Commission.

CBB is a generalist pollinator and has historically been observed foraging on plants from a wide array of plant families and a wide range of flowering species, including perennial shrubs and annual herbaceous species, regardless of habitat type. CBB have exhibited preference for species within the Fabaceae, Apocynaceae, Asteraceae, Boraginaceae, Ericaceae, Hydrophyllaceae, Lamiaceae, Plumbaginaceae, and Polygonaceae families (Thorp et al. 1983; Richardson 2017; Osborne 2020).

Foraging is documented across multiple genera with strong preferences shown for native sage species (*Salvia* spp.), milkweed (*Asclepias* spp.), and plants within the Fabaceae family (Thorp et al. 1983; Williams et al. 2014). CBB are most likely encountered in areas with an abundance of preferred floral resources and not likely encountered where flowers are absent, even if CBB are present in the surrounding habitat.

The annual bumble bee lifecycle begins between February or March when a foundress queen emerges from hibernation and leaves her overwintering location (CDFW 2023). Over the next few weeks, the foundress queen will search for a suitable nest location to establish a new colony. Once she identifies a nesting site, she will spend the next month building waxen pots, filling them with collected pollen and nectar, and laying the first brood of eggs, which will become workers (an all-female cast) (Xerces 2023a). After another 4 to 5 weeks, the adult workers will emerge and take over pollen foraging and nest maintenance responsibilities from the foundress queen. The foundress queen continues to produce additional workers, allowing the colony to grow until a substantial worker caste is established, and the foundress queen no longer needs to leave the nest to forage. Each worker has a life span of 1 to 2 months.

The foundress queen switches to laying two sets of eggs: gynes, i.e., fertilized eggs that will become next season's foundress queens, and unfertilized male eggs. Once matured, the gynes leave the colony to mate but will return to the nest for protection and to contribute pollen. The colony will continue to grow through late spring, at which point the female workers may begin to lay unfertilized eggs that will become males. Males do not collect pollen and do not return to their natal colony once they leave to mate; they perch on high vegetation (from which they chase after prospective mates) through the end of summer, nectar for their own survival, and die a few weeks after leaving the nest. The newly mated queens, formerly known as gynes, continue to nectar on any remaining blooms to build up fat reserves for the winter. These future foundress queens identify sites for overwintering and retreat into abandoned rodent burrows or burrow themselves into suitable soil, where they enter a hibernation-like state until the following spring.

Field surveys identified one foraging Queen during the foundress early flight season (March 2024). This CBB was observed foraging briefly on black sage and then flew off-site and was not seen again. During each additional survey on-site, particular attention was given to identifying all *Bombus* species. No other CBB were observed but three additional *Bombus* species were recorded/observed using the site. *Bombus* species observed included Western bumble bee (*Bombus californicus*), Yellow bumble bee (*Bombus vosnesenskii*), and Black-tailed bumble bee (*Bombus melanopygus*). All three of these species were observed regularly foraging on-site and a yellow bumble bee nest site was also detected.

#### Cooper's Hawk Status: County Group 1

One Cooper's hawk was observed during the focused California gnatcatcher surveys. This individual was observed flying overhead but may also utilize the site for perching and foraging. The eucalyptus woodland on-site does represent potential nesting habitat for Cooper's hawk and other raptors, but no nests were observed during the field surveys.

#### Large Mammal Use

Due to the proximity of the project site to existing development and the overall small size of the study area the site contains low quality or limited habitat for large mammals.

#### Raptor Nesting & Foraging

The site contains areas that could support raptor foraging. Raptors are large predatory or scavenger birds that typically require tall trees for perching and nesting associated with adjacent open grasslands to forage. Due to declining habitat and the associated declining numbers of these species on the whole, many raptor species have been designated as California Species of Special Concern by the CDFW. These species are protected, especially during their critical nesting and wintering stages. Raptors are protected under the CDFW California Raptor Protection Act (Title 14, Section 670). Please note that no raptor nests were observed on-site.

#### Migratory Bird Treaty Act

On-site bird species have the potential to nest within the vegetation associated with the Diegan coastal sage scrub, non-native grasslands, and the eucalyptus woodland habitats. Active bird nests are protected under the Migratory Bird Treaty Act (MBTA).

#### Jurisdictional Wetlands and Waterways

A potential jurisdictional wetland/ephemeral drainage occurs along the eastern portion of the property. This feature transports water from off-site, south to the north and then continues northwest beyond the study property. This feature contains sparse wetland plants including black willow and mule-fat. Off-site to the south, the feature appears to be man-made or altered to support storm water run-off. On-site, the drainage widens from a low flow channel of approximately 1-foot to five-foot in the corner of the property before it then narrows again and flows off-site into the neighboring residential community where it appears to empty into a golf course pond. The connection downstream of the pond to the San Dieguito River does not appear to be maintained. This resource will not be directly impacted by the project but if the property owner intends to impact this feature in the future a formal wetland delineation would be required to determine its jurisdictional boundaries. This feature would not be classified as a County Resource Protection Ordinance (RPO) wetland.

#### Other Unique Features/Resources

##### Wildlife Corridors and Linkages

No regional wildlife corridors or regional linkages occur within the project site. The project site is located outside of the SC MSCP PAMA and provides limited regional biological value.

##### Topography/Connectivity

Overall, the project area is isolated from large areas of natural habitats and lacks important connectivity features. The project site is surrounded on all sides by existing residential properties.

#### **SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION**

The study area is located within the County of San Diego's SC MSCP but is outside of the PAMA and does not meet the criteria of a BRCA. The impact analysis and associated mitigation requirements are consistent with the SC MSCP, BMO, and the County's Guidelines for Determining Significance for Biological Resources (County of San Diego, 2010).

#### **Riparian Habitat and Sensitive Natural Community**

The proposed project will directly impact 1.73 acres of the 2.3 acres on-site. However, due to the project's location within a Minor Amendment Area, the entire property would be considered impacted, and all sensitive habitats on-site would require habitat-based mitigation (Table 1, Figure 4). Table 1 details the impacts to each land cover type and the required mitigation.

**Table 1. Project Impacts to Vegetation Communities**

<i>Habitat Type</i>	<i>Acres within the Project Site</i>	<i>Impacts within Project Footprint (Acres)</i>	<i>Impacts Outside the Project Footprint (Acres)</i>	<i>Mitigation Ratio*</i>	<i>Mitigation Acreage</i>
Urban/Developed	0.0	0.0	0.0	NA	NA
Disturbed Habitat	0.0	0.0	0.0	NA	NA
Non-Native Grassland	0.6	0.4	0.2	0.5:1	0.3
Diegan Coastal Sage Scrub	1.53	1.3	0.23	1:1	1.53
Riparian Scrub	0.07	0.0	0.07	2:1	0.14
Eucalyptus Woodland	0.1	0.03	.07	NA	NA
Total	2.3	1.73	0.57	NA	1.97

\*Mitigation ratios determined through Attachment K of the BMO, assuming that the impact site is not a BRCA and the mitigation site is a BRCA.

### **Special Status Species**

The project will impact suitable nesting and foraging habitat for Cooper's Hawk. The project contains suitable nesting and foraging habitat for Cooper's Hawk, but it should also be noted that this species was not observed nesting on-site (Attachment C) (Figure 4). As detailed previously, a lone CBB queen was observed during one site visit in March of 2024 foraging on black sage. Following the observation, a search of the site was conducted on each additional site visit to determine if CBB continued to utilize the site for foraging and or nesting. No further observations of CBB occurred and no CBB nest sites were observed. The project site does support a nest for the common yellow bumble bee. The observation of CBB on-site is not considered significant because a nest location was not observed and regular use of the site by CBB queens, gynes, worker or males was not observed. However, to ensure the project does not impact CBB, the project will be conditioned to perform a pre-construction nest survey prior to any clearing and grubbing during the CBB nesting period (April 1<sup>st</sup>-August 31<sup>st</sup>).

The project has the potential to indirectly impact 18 California adolphia plants. These sensitive plants will not be directly impacted by the proposed project footprint but since they will not be conserved within an on-site open space easement they have been assessed as impacted. California adolphia impacts will require species-based mitigation at a 1:1 ratio.

### **Federal Wetlands**

A potential jurisdictional wetland occurs along the eastern portion of the property. This ephemeral drainage will not be directly impacted by the project and federal permits are not anticipated as a result of the implementation of the project.

### **Wildlife Movement and Nursery Sites**

The project will not impact any significant wildlife movement areas and mitigation is not necessary.

### **Local Plans, Ordinances and Adopted Plans**

Based upon the County's Guidelines for Determining Significance for Biological Resources (2010), a significant impact related to local policies, ordinances and adopted plans would occur if the project would:

- Impact coastal sage scrub vegetation within lands outside of the MSCP more than the County's five-percent habitat loss threshold.
- Preclude connectivity between areas of high values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.
- Preclude or prevent the preparation of the subregional NCCP.
- Impact any amount of wetlands or sensitive habitat lands as outlined in the RPO.
- Not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- Not conform with the goals and requirements, as outlined in any applicable Habitat Conservation Plan, Habitat Management Plan, Special Area Management Plan, Watershed Plan, or similar regional planning effort.
- Not minimize impacts to Biological Resources Core Areas (BRCAs) within lands in the MSCP, as defined by the Biological Mitigation Ordinance (BMO).
- Not maintain existing movement corridors and/or habitat linkages as defined by the BMO.
- Not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- Reduce the likelihood of survival and recovery of listed species in the wild.

- Result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (MBTA).
- Result in the take of eagles, eagle eggs or any part of an eagle (Bald Eagle Protection Act)

#### Impact to Coastal Sage Scrub

The project is located within the MSCP and will be mitigated in accordance with the County's BMO

#### Preparation of a Subregional NCCP

The project site is within SC MSCP and outside PAMA or a BRCA. Project impacts are in accordance with the County's BMO, therefore no impact is identified for this threshold. The project would not impact the preparation of a subregional Natural Communities Conservation Plan (NCCP).

#### Impact Wetlands or Sensitive Lands as Identified in the RPO

The project will not impact wetlands, or any other sensitive land identified in the RPO. Jurisdictional wetland and waterways do not occur on-site.

#### Minimization/Mitigation of Coastal Sage Scrub Habitat Loss

The project will impact 1.53 acres of disturbed Diegan coastal sage scrub. These impacts will be mitigated in accordance with the County's BMO.

#### Non-Conformance with HCP, HMP, Special Area Management Plan, Watershed Plan or Similar Plan

The project site is within SC MSCP and outside PAMA or a BRCA. Project impacts are in accordance with the County's BMO, therefore no impact is identified for this threshold. The project would not impact the preparation of a HCP, HMP, Special Area Management Plan, Watershed Plan or Similar Plan.

#### Connectivity between High Habitat Values

The project contains sensitive habitats that support special-status species but is surrounded by existing residential properties on all four sides (north, south, west and east). The County's original MSCP habitat evaluation model mapped the property as containing high to very high habitat but since the model was created, the project site has become isolated due to the approval of off-site residential developments. The property no longer contains habitat that would be considered to have high or very high lands for landscaped connectivity.

#### Movement Corridors

The project site has limited functionality to support wildlife movement. As shown in Figure 3, the site is surrounded by existing single-family residences. However, a small, disturbed ephemeral drainage parallels the eastern portion of the property. The drainage appears to be altered or man-made south of the project site and then contains as a natural drainage channel on-site. Within the drainage, water flows from south to north, and then in the corner of the property continues northwest through an existing residential community where it empties into a golf course pond. There doesn't appear to be a natural connection downstream of the pond to the San Dieguito River.

On-site, the vegetation within the drainage consists of an open canopy, comprised of primarily mule-fat but downstream and off-site, the drainage contains a higher density of riparian vegetation before

connecting with the golf course pond. The project site on a whole, contains limited wildlife movement habitat but the ephemeral drainage would be considered a local wildlife movement corridor allowing movement from south to north into the open space area associated with the golf course downstream.

#### Impacts to Biological Resource Core Areas (BRCAs)

The project site does meet the criteria of a BRCA. Therefore, no impact would occur.

#### Impacts to MSCP Narrow Endemic Species

No MSCP narrow endemic species have been identified within the project area and, therefore, there are no impacts.

#### Reduce Survival and Recovery of Listed Species

No listed species have been identified within the project area and, therefore, there are no impacts.

#### MBTA Species

The project will directly impact 1.73 acres of native and naturalized habitats . These areas have the potential to provide suitable vegetation for nesting birds. To avoid the direct loss of nest(s) protected under the MBTA a pre-construction nesting survey will be required. If project brushing, clearing, grubbing, grading, or construction activities are proposed within 500 feet of raptor nesting habitat and/or 300 feet of migratory bird nesting habitat during the migratory bird breeding season (February 1 through August 31), a qualified County-approved biologist shall conduct a pre-construction survey no more than three days prior to the proposed activities to determine the presence/absence of nesting raptors and/or other migratory birds to ensure that active nests are not impacted. If active nest(s), are detected, no construction activities should occur until the young have fledged and are no longer returning to the nest(s), as determined by the project biologist. If no active nests are present, construction activities may commence since there would be no potential for significant direct or indirect impacts to nesting migratory birds and/or raptors.

#### Take of Eagles or Eagle Eggs

No golden eagles have been recorded in the project area and no nesting sites are known within 4,000 feet of the project site. Thus, the project would not have an impact to eagles. No impact is identified for this subthreshold.

### **CUMULATIVE IMPACTS**

Since the site is located outside of PAMA and does not meet the criteria of a BRCA the proposed site improvements would not result in a potential cumulatively significant impact.

### **MITIGATION**

As detailed previously, due to the location of the property within a SC MSCP Minor Amendment Area the entire project site will be considered impacted. This includes impacts to 1.53 acres of Diegan coastal sage scrub, 0.6-acre of non-native grassland, 0.07-acre of riparian scrub and 0.1-acre of eucalyptus woodland. Impacts to Diegan coastal sage scrub, non-native grassland and riparian scrub will require mitigation (Diegan Coastal Sage Scrub Tier II habitat at a 1:1 ratio, non-native grassland Tier III at a 0.5:1 and riparian scrub Tier I at a 2:1 ratio). Mitigation for habitat impacts to Tier I, Tier II



and Tier III habitats will be achieved by conserving and purchasing 1.97 acre of credits at an approved mitigation bank and at the off-site mitigation parcel (Appendix F) (1.53 acres of Diegan coastal sage scrub (or Tier II habitat), 0.3 acre of non-native grassland (or Tier III habitat) and 0.14-acre of riparian scrub or Tier III habitat). Impacts to 18 California adolphia plants will be mitigated by the preservation of 44 individuals at the off-site mitigation parcel (Appendix F).

As detailed previously, the observation of one CBB queen on-site is not considered significant because a nest location was not observed and regular use of the site by CBB queens, gynes, worker or males was not observed. However, to ensure the project does not impact CBB, the project will be conditioned to perform a pre-construction nest survey prior to any clearing and grubbing during the CBB nesting period (April 1st-August 31st).

Clearing of vegetation on-site represents a potentially significant impact. As a mitigation measure for this potential impact, if any construction work is proposed to occur during the County of San Diego migratory bird or raptor breeding season (February 1 through August 31), a qualified biologist will be required to conduct a bird and raptor survey no more than three days prior to scheduled operations to ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer would be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum of 300 feet for migratory birds and 500 feet for raptors, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction would be allowed to occur within the fenced zone until the young have fledged and will not be impacted by the project. This will reduce the potential impact to below a level of significance.

Standard siltation and erosion control Best Management Practices (BMPs) will be implemented during construction, including boundary silt fencing, gravel bags, fiber rolls, weed-free straw wattles and mulch, and slope stabilization. The landscape plan will stipulate that project landscaping will not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list.

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**Preparer and Persons/Organizations Contacted**

Prepared by:



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Korey Klutz, County Approved Biologist

**ATTACHMENTS:**

Figure 1 Regional Vicinity

Figure 2 Project Vicinity & MSCP Categories

Figure 3 Biological Resources

Figure 4 Project Impacts

Appendix A Survey Dates and Weather Conditions

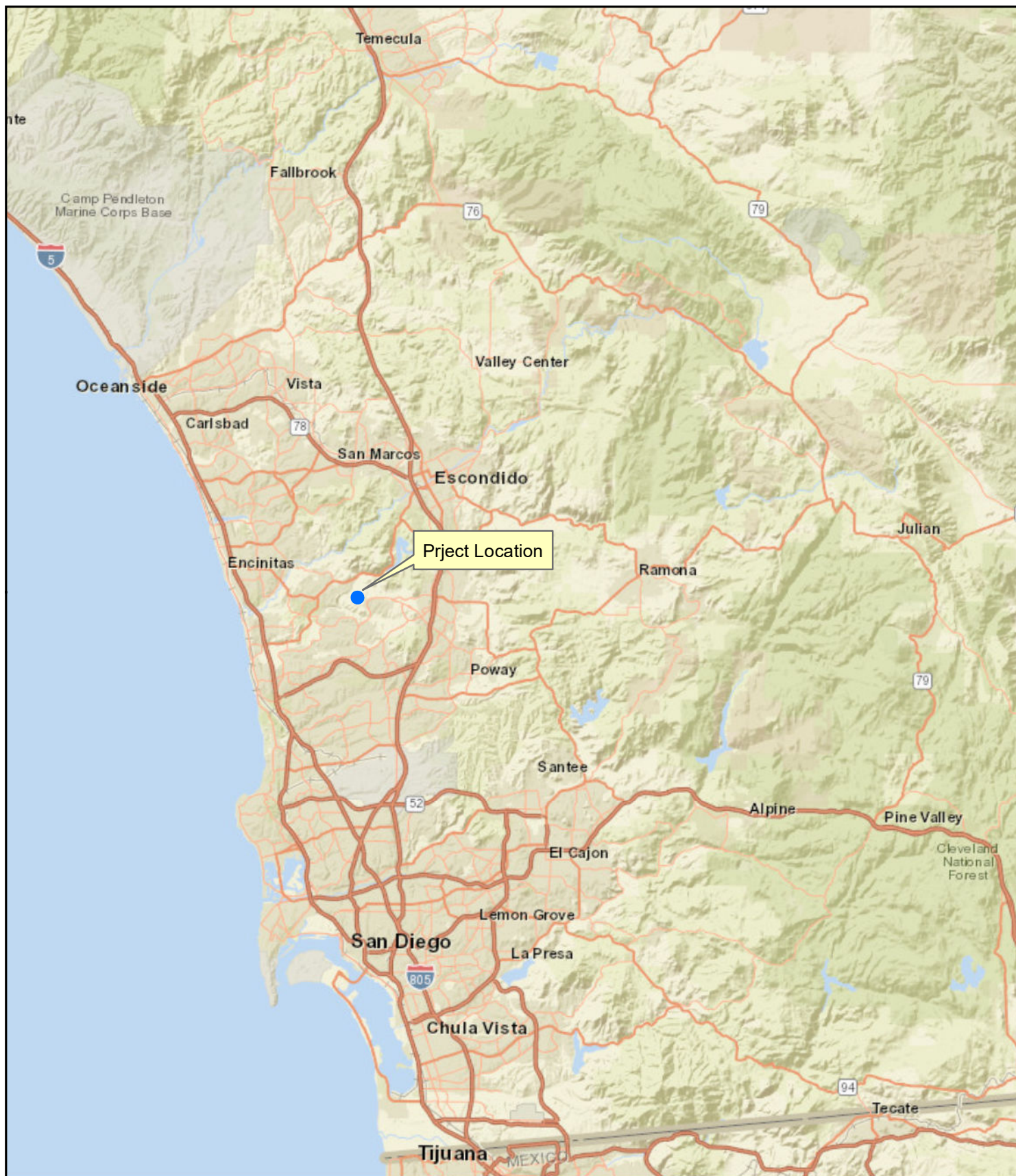
Appendix B Wildlife List

Appendix C Plant List

Appendix D Special Status Species with Potential to Occur

Appendix E Focused Protocol Survey Report for the coastal California gnatcatcher

Appendix F Proposed Mitigation Plan for Habitat and California Adolphia Impacts

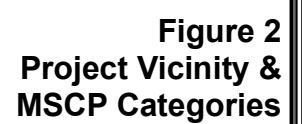
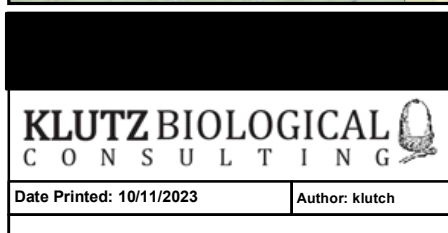


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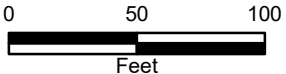


**Figure 1**  
**Regional Vicinity**









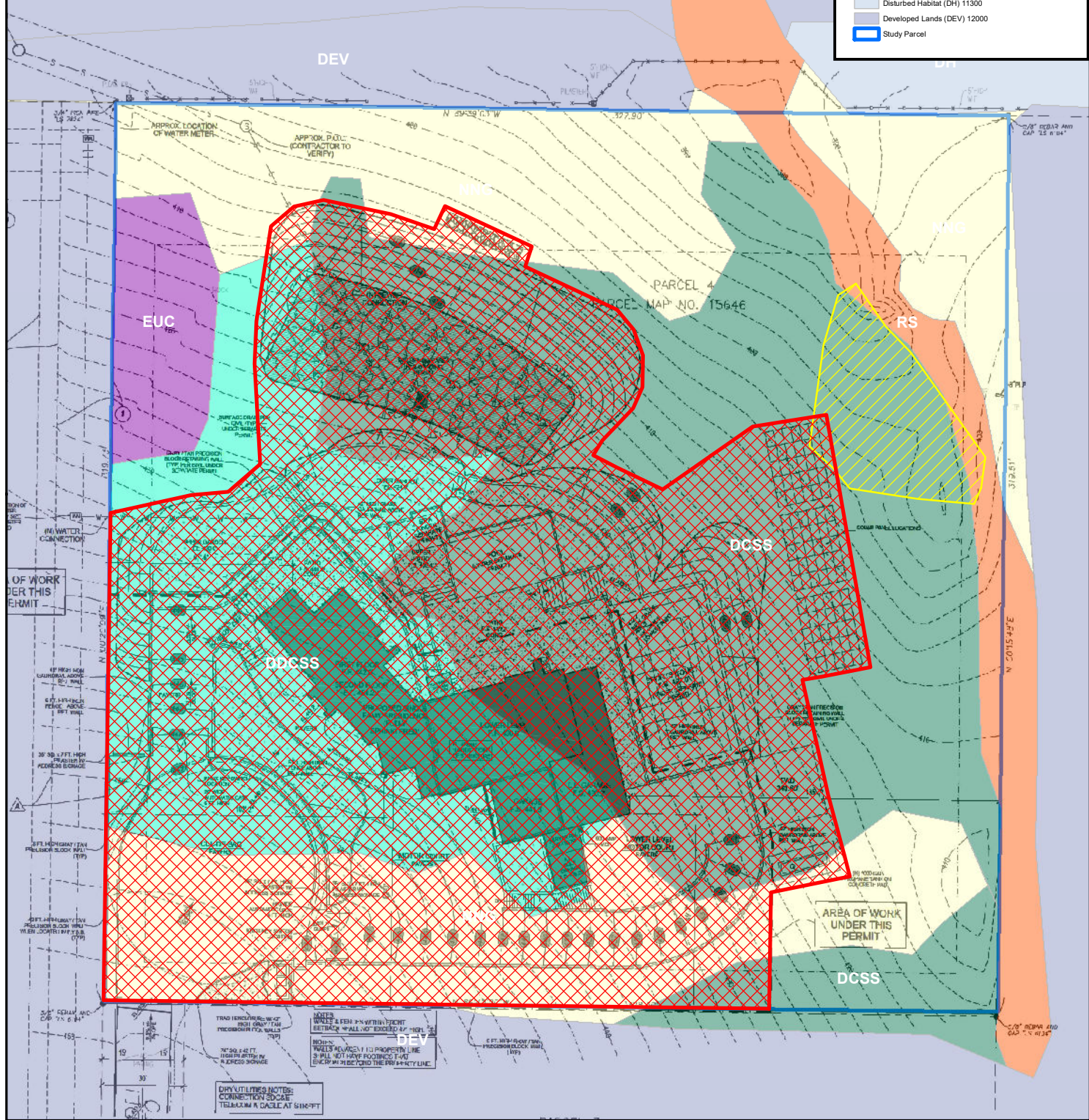
**Figure 3**  
**Biological Resources**



ALL PROPOSED BUILDINGS, STRUCTURES, ADDITIONS, MODIFICATIONS TO BUILDINGS/STRUCTURES MUST COMPLY WITH THE APPROVED LOCATION, AS SHOWN ON THE COUNTY APPROVED PLOT PLAN SHEET AT D. AT THE DISCRETION OF THE COUNTY, THE PROPERTY OWNER MAY BE REQUIRED TO PROVIDE PROOF OF CURRENT PLACEMENT OF EACH PARCEL. THIS MAY INCLUDE A STAMPED AND SIGNED SEBACK CERTIFICATE PREPARED BY A CALIFORNIA LICENSED SURVEYOR OR CIVIL ENGINEER. [COUNTY BUILDING CODE 91.1.107.2]

**APPROXIMATE LANDSCAPE AREA**  
 TOTAL PROPOSED LANDSCAPE AREA: 12,425 SF.  
 LANDSCAPE PLAN SUBMITTED UNDER:

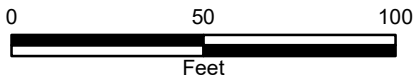
- Proposed Project Impacts
- California adolphia (Adolphia californica)
- Diegan Coastal Sage Scrub (DCSS) 32500
- Disturbed Diegan Coastal Sage Scrub (DDCSS) 32500
- Non-Native Grassland (NNG) 42200
- Riparian Scrub (RS) 63000
- Eucalyptus Woodland (EUC) 79100
- Disturbed Habitat (DH) 11300
- Developed Lands (DEV) 12000
- Study Parcel



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**Figure 4**  
**Proposed Project Impacts to**  
**Biological Resources**

## Appendix A Survey Dates & Weather Conditions

Survey Date	High Temp (°F)	Survey Time	Wind Range (mph)	Cloud Cover (%)	Biologist	Survey Type
8/23/23	66	1000-1200	1	35	K. Klutz*	General survey
2/25/24	67	1000-1200	5-10	65	K. Klutz*	Rare Plants
3/14/24	58	0900-1000	4	80	A. Guitierrez*	CAGN**
3/17/24	59	1000-1200	3-12	75	K. Klutz*	Rare Plants\CBB
3/28/24	68	0945-1045	1-2	50	A. Guitierrez*	CAGN
4/7/24	68	1000-1100	2-7	35	K. Klutz*	Rare Plants\CBB
4/12/24	57	1000-1100	5-10	95	A. Guitierrez*	CAGN Survey
5/5/24	75	1000-1130	0-5	60	K. Klutz*	Rare Plants\CBB
6/18/24	78	1000-1100	0-5	50	K. Klutz*	Rare Plants\CBB
3/23/25	70	930-1145	0-5	60	K. Klutz*	Off-site mitigation
3/30/25	59-63	1100-1400	0-5	40-50	K. Klutz*	Lusardi Creek Preserve Mitigation Analysis\On-site review of California adolphia population status\CBB

\*= Qualified CBB biologist \*\*= CBB Queen documented during CAGN survey



## Attachment B Wildlife List Detected During Field Surveys

Scientific Name	Common Name
<i>Buteo jamaicensis</i>	Red-tailed hawk
<i>Buteo lineatus</i>	Red-shouldered hawk
<i>Accipiter cooperii</i>	Cooper's hawk (WL)
<i>Charadrius vociferus</i>	Killdeer
<i>Pheucticus melanocephalus</i>	Black-headed grosbeak
<i>Cathartes aura</i>	Turkey vulture
<i>Zenaida macroura</i>	Mourning dove
<i>Corvus brachyrhynchos</i>	American crow
<i>Corvus corax</i>	Common raven
<i>Haemorhous mexicanus</i>	House finch
<i>Spinus psaltria</i>	Lesser goldfinch
<i>Stelgidopteryx serripennis</i>	Northern rough-winged swallow
<i>Psaltiriparus minimus</i>	Bushtit
<i>Icterus cucullatus</i>	Hooded oriole
<i>Molothrus ater</i> *	Brown-headed cowbird*
<i>Mimus polyglottos</i>	Northern mockingbird
<i>Toxostoma redivivum</i>	California thrasher
<i>Oreothlypis celata</i>	Orange-crowned warbler
<i>Setophaga coronata</i>	Yellow-rumped warbler
<i>Melospiza melodia</i>	Song sparrow
<i>Melospiza crissalis</i>	California towhee
<i>Pipilo maculatus</i>	Spotted towhee
<i>Zonotrichia leucophrys</i>	White-crowned sparrow
<i>Passer domesticus</i> *	House sparrow*
<i>Sturnus vulgaris</i> *	European starling*
<i>Calypte anna</i>	Anna's hummingbird
<i>Selasphorus sp</i>	Allen's or rufous hummingbird

## Attachment B Wildlife List Detected During Field Surveys

Scientific Name	Common Name
<i>Thryomanes bewickii</i>	Bewick's wren
<i>Troglodytes aedon</i>	House wren
<i>Chamaea fasciata</i>	Wrentit
<i>Sayornis nigricans</i>	Black phoebe
<i>Tyrannus vociferans</i>	Cassin's kingbird
<i>Bombus crotchii</i>	Crotch's bumblebee (CCESA)
<i>Bombus californicus</i>	Yellow bumblebee
<i>Bombus melanopygus</i>	Black-tailed bumblebee
<i>Bombus vosnesenskii</i>	Vonsnesenski's bumblebee
<i>Pseudacris hypochondriaca</i>	Baja California tree frog
<i>Sceloporus occidentalis</i>	Western fence lizard
<i>Canis latrans</i>	Coyote
<i>Otospermophilus beecheyi</i>	California ground squirrel
<i>Leptotes marina</i>	Marine blue
<i>Zizina labradus oxleyi</i>	<i>Southern Blue</i>
<i>Apodemia virgulti</i>	<i>Behr's Metalmark</i>
<i>Anthocharis sara</i>	<i>Sara's Orangetip</i>
WL: California Watch List species FT: Federally listed as Threatened SSC: California Species of Special Concern, CCESA: Candidate Species for California Endangered Species, *Introduced species	

### Appendix C Vascular Plant List

Scientific Name	Common Name	Legal Status
<i>Adolphia californica</i>	California adolphia	CRPR 2B, County Group B
<i>Acmispon scoparius</i>	Deerweed	None
<i>Baccharis sarothroides</i>	Chaparral Broom	None
<i>Baccharis salicifolia</i>	Mulefat	None
<i>Oxalis pes-caprae</i> **	Bermuda Buttercup	None
<i>Artemisia californica</i>	California Sagebrush	None
<i>Lactuca serriola</i> **	Prickly Lettuce	None
<i>Opuntia littoralis</i>	Coastal Prickly Pear	None
<i>Medicago polymorpha</i> **	Bur Clover	None
<i>Salix exigua</i>	Narrowleaf Willow	None
<i>Brassica nigra</i> **	Black Mustard	None
<i>Cynara cardunculus</i> **	Artichoke Thistle	None
<i>Rhus integrifolia</i>	Lemonade Berry	None
<i>Stipa pulchra</i>	Purple Needlegrass	None
<i>Stipa lepida</i>	Foothill Needlegrass	None
<i>Conyza canadensis</i> **	Canadian Horseweed	None
<i>Carex densa</i>	Dense Sedge	None
<i>Salvia mellifera</i>	Black Sage	None
<i>Salvia apiana</i>	White Sage	None
<i>Picheris echiodes</i> **	Picheris	None
<i>Deinandra fasciculata</i>	Clustered Tarweed	None
<i>Avena barbata</i> **	Slender Wild Oat	None
<i>Chlorogalum pomeridianum</i>	Soap Plant	None
<i>Dichelostemma capitatum</i>	Blue Dicks	None
<i>Galium angustifolium</i>	Narrowleaf Bedstraw	None

### Appendix C Vascular Plant List

Scientific Name	Common Name	Legal Status
<i>Sisyrinchium bellum</i>	Blue-eyed Grass	None
<i>Erodium botrys</i> **	Broadleaf Filaree	None
<i>Adenostoma fasciculatum</i>	Chamise	None
<i>Eriogonum fasciculatum</i>	California buckwheat	None
<i>Mimulus aurantiacus</i>	Sticky Monkeyflower	None
<i>Gnaphalium californicum</i>	California Cudweed	None
<i>Quercus agrifolia</i> *	Coast Live Oak	None
<i>Rhamnus crocea</i>	Redberry	None
<i>Eucalyptus</i> sp. **	Blue Gum	None
<i>Galium nuttallii</i>	Nuttall's Bedstraw	None
<i>Isomeris arborea</i>	Bladderpod	None
<i>Schoenoplectus</i> sp**	Bulrush	None
<i>Gnaphalium bicolor</i>	Bicolor Cudweed	None
<i>Platanus racemosa</i> *	Western Sycamore	None
<i>Convolvus arvensis</i> **	Morning Glory	None
<i>Calytstegia marcostegia</i>	Morning Glory	None
<i>Stachys</i> sp.	Stachys	None
<i>Schinus terebinthifolia</i> **	Brazilian Peppertree	None
<i>Schinus molle</i> **	Peppertree	None
<i>Atriplex semibicata</i> **	Atriplex	None
<i>Bromus diandrus</i> **	Ripgut	None
<i>Bromus hordeaceus</i> **	Soft Brome	None
<i>Bromus reubens</i> **	Foxtail	None
<i>Lonicera subspicata</i>	Honeysuckle	None

### Appendix D Special Status Species with Potential to Occur

Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Accipiter cooperii</i>	Cooper's Hawk	Woodlands, riparian forests, and suburban areas with mature trees.	None	Watch List	NA	Yes	Detected
<i>Accipiter striatus</i>	Sharp-shinned Hawk	Dense coniferous and mixed forests, often near riparian zones.	None	Watch List	NA	No	Note detected. Low to moderate.
<i>Aimophila ruficeps canescens</i>	Rufous-crowned Sparrow	Coastal sage scrub, open chaparral, rocky slopes, and grasslands with scattered shrubs.	None	Watch List	NA	Yes	Note detected. Moderate.
<i>Agelaius tricolor</i>	Tricolored Blackbird	Freshwater marshes, agricultural fields with tall vegetation, grasslands with nearby water.	None	Threatened	NA	Yes	Note detected. Low.
<i>Ammodramus savannarum</i>	Grasshopper Sparrow	Open grasslands, prairies, and pastures with sparse shrubs and low vegetation.	None	Species of Special Concern	NA	No	Note detected. Low.
<i>Amphispiza belli belli</i>	Bell's Sage Sparrow	Coastal sage scrub, arid scrublands, and open chaparral often on rocky or sandy soils.	None	Watch List	NA	Yes	Note detected. Moderate.
<i>Anniella pulchra pulchra</i>	Silvery Legless Lizard	Loose, sandy soils under leaf litter or duff in coastal dunes, chaparral, and woodlands.	None	Species of Special Concern	NA	Yes	Note detected. Low.
<i>Antrozous pallidus</i>	Pallid Bat	Deserts, scrublands, and woodlands; roosts in rock crevices, buildings, and caves.	None	Species of Special Concern	NA	Yes	Note detected. Low.
<i>Ardea herodias</i>	Great Blue Heron	Wetlands, estuaries, marshes, shorelines, and riparian zones.	None	None	NA	No	Note detected. Low.
<i>Asio flammeus</i>	Short-eared Owl	Open country, grasslands, marshes, and coastal prairies with low vegetation.	None	Species of Special Concern	NA	Yes	Note detected. Low to moderate.
<i>Athene cunicularia hypogea</i>	Burrowing Owl	Open grasslands, deserts, agricultural fields; uses burrows for nesting.	None	Species of Special Concern	NA	Yes	Note detected. Low.
<i>Branchinecta sandiegoensis</i>	San Diego Fairy Shrimp	Vernal pools and ephemeral wetlands in coastal mesas and grasslands.	Endangered	None	NA	Yes	Note detected. Low.

Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Branta canadensis</i>	Canada Goose	Lakes, ponds, rivers, and agricultural fields; often in urban parks.	None	None	NA	No	Note detected. Low.
<i>Chaetodipus californicus femoralis</i>	Dulzura California Pocket Mouse	Coastal sage scrub, chaparral, and rocky hillsides.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Chaetodipus fallax fallax</i>	Northwestern San Diego Pocket Mouse	Scrublands and chaparral, often in sandy or rocky soils.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Charina trivirgata roseofusca</i>	Coastal Rosy Boa	Rocky hillsides, scrub, chaparral, and deserts; uses rodent burrows.	None	None	NA	No	Note detected. Moderate.
<i>Choeronycteris mexicana</i>	Mexican Long-tongued Bat	Desert canyons and riparian habitats with flowering agaves and cacti.	None	None	NA	No	Note detected. Moderate.
<i>Circus cyaneus hudsonius</i>	Northern Harrier	Marshes, grasslands, and agricultural fields; nests on the ground.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Cnemidophorus hyperythrus</i>	Orange-throated Whiptail	Coastal sage scrub, chaparral, and edges of grasslands.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Cnemidophorus tigris multiscutatus</i>	Coastal Western Whiptail	Open habitats including scrub, chaparral, and desert washes.	None	None	NA	No	Note detected. Moderate.
<i>Coccyzus americanus occidentalis</i>	Yellow-billed Cuckoo	Riparian woodlands and dense forests near water.	Threatened	Endangered	NA	Yes	Note detected. Low.
<i>Coleonyx variegatus abbottii</i>	San Diego Banded Gecko	Rocky outcrops, canyons, and arid scrublands.	None	None	NA	Yes	Note detected. Low.
<i>Crotalus ruber ruber</i>	Northern Red Diamond Rattlesnake	Coastal scrub, chaparral, rocky hillsides, and grasslands.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Danaus plexippus</i>	Monarch Butterfly	Meadows, grasslands, and urban gardens; larvae depend on milkweed.	Candidate	None	NA	No	Note detected. Low.
<i>Diadophis punctatus similis</i>	San Diego Ringneck Snake	Moist woodlands, riparian areas, and under rocks or debris.	None	None	NA	No	Note detected. Low.

Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Elanus caeruleus</i>	Black-shouldered Kite	Grasslands, marshes, and agricultural areas with perching sites.	None	Watch List	NA	Yes	Note detected. Moderate.
<i>Eremophila alpestris actis</i>	Horned Lark	Open fields, grasslands, and coastal plains.	None	Watch List	NA	No	Note detected. Moderate.
<i>Eumeces skiltonianus interparietalis</i>	Coronado Skink	Moist habitats, woodlands, grasslands, and near streams.	None	None	NA	No	Note detected. Moderate.
<i>Eumops perotis californicus</i>	Greater Western Mastiff Bat	Cliffs, canyons, and large rock outcrops; roosts in crevices.	None	Species of Special Concern	NA	Yes	Note detected. Low.
<i>Falco columbarius</i>	Merlin	Open woodlands, grasslands, tundra, and coastal areas during migration.	None	None	NA	No	Note detected. Low.
<i>Falco mexicanus</i>	Prairie Falcon	Open country, deserts, grasslands, and cliffs for nesting.	None	Watch List	NA	No	Note detected. Low.
<i>Falco peregrinus anatum</i>	American Peregrine Falcon	Cliffs and urban structures; forages over wetlands and open areas.	Delisted (formerly Endangered)	Delisted (formerly Endangered)	NA	Yes	Note detected. Low.
<i>Felis concolor</i>	Mountain Lion	Mountains, chaparral, and large undeveloped areas with cover and prey.	None	None	NA	Yes	Note detected. Low.
<i>Lanius ludovicianus</i>	Loggerhead Shrike	Open scrub, grasslands, and agricultural areas with perches.	None	Species of Special Concern	NA	Yes	Note detected. Low.
<i>Larus californicus</i>	California Gull	Lakes, coastal estuaries, and inland wetlands.	None	None	NA	No	Note detected. Low.
<i>Lepus californicus bennettii</i>	San Diego Black-tailed Jackrabbit	Coastal sage scrub, chaparral, and open grasslands.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Linderiella occidentalis</i>	California Lindellaria	Vernal pools and ephemeral freshwater wetlands.	None	None	NA	Yes	Note detected. Low.
<i>Megathymus yuccae harbisoni</i>	Coastal Giant Skipper	Coastal sage scrub with presence of host yucca species.	None	None	NA	No	Note detected. Low.
<i>Neotoma lepida intermedia</i>	San Diego Desert Woodrat	Coastal sage scrub, arid chaparral, and rocky areas.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.

Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Nyctinomops macrotis</i>	Big Free-tailed Bat	Deserts, canyons, and rocky cliffs; roosts in crevices and buildings.	None	None	NA	No	Note detected. Low.
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat	Deserts, rocky terrain; roosts in caves and crevices.	None	None	NA	No	Note detected. Low.
<i>Odocoileus hemionus</i>	Southern Mule Deer	Woodlands, chaparral, forests, and meadows.	None	None	NA	Yes	Note detected. Moderate.
<i>Phobetus robinsoni</i>	Robinson's Beetle	Unknown; possibly associated with sandy soils in coastal areas.	None	None	NA	No	Note detected. Low.
<i>Phrynosoma coronatum blainvillei</i>	San Diego Horned Lizard	Open scrublands, sandy washes, and grasslands with ant populations.	None	Species of Special Concern	NA	Yes	Note detected. Moderate.
<i>Riparia riparia</i>	Bank Swallow	Nests in vertical banks along rivers or streams; forages over open water.	None	Threatened	NA	No	Note detected. Low.
<i>Acanthomintha ilicifolia</i>	Thornmint	Clay soils in coastal sage scrub and grasslands, often in vernal pool areas.	Endangered	Endangered	1B.1	Yes	Note detected. Low.
<i>Adolphia californica</i>	California adolphia	Clay soils in Diegan coastal sage scrub and chaparral.	None	None	2B.1	Yes	Note detected. Detected.
<i>Agave shawii</i>	Shaw's agave	Coastal bluffs and dunes in coastal sage scrub and maritime succulent scrub.	None	None	2B.1	Yes	Note detected. Low.
<i>Aphanisma blitoides</i>	Aphanisma	Coastal strand and bluffs; sandy saline soils near the ocean.	None	None	1B.2	Yes	Note detected. Low.
<i>Atriplex pacifica</i>	South coast saltbush	Coastal bluff scrub and alkaline soils in lowland areas.	None	None	1B.2	Yes	Note detected. Low.
<i>Bergerocactus emoryi</i>	Golden snake cholla	Coastal sage scrub, maritime succulent scrub on sandy soils.	None	None	2B.2	Yes	Note detected. Low.
<i>Calandrinia maritima</i>	Seaside calandrinia	Sandy soils in coastal dunes and bluffs.	None	None	1B.2	Yes	Note detected. Low.
<i>Camissonia lewisii</i>	Lewis sun cup	Sandy or rocky soils in coastal sage scrub and chaparral.	None	None	4.2	No	Note detected. Low.
<i>Centromadia parryi australis</i>	Southern tarplant	Seasonally moist depressions in valley and foothill grasslands.	None	None	1B.1	Yes	Note detected. Low.
<i>Chorizanthe glabriuscula orcuttiana</i>	Orcutt's spineflower	Coastal bluffs and dunes with sandy soils.	Endangered	Endangered	1B.1	Yes	Note detected. Low.



Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Chorizanthe procumbens</i>	Prostrate spineflower	Sandy or gravelly openings in chaparral and coastal scrub.	None	None	3.3	No	Note detected. Low.
<i>Coreopsis maritima</i>	Sea dahlia	Coastal bluffs and dunes in sandy soils of maritime scrub.	None	None	4.2	Yes	Note detected. Low.
<i>Corethrogyne filaginifolia incana</i>	San Diego sand aster	Coastal sage scrub and sandy areas in disturbed sites.	None	None	1B.1	Yes	Note detected. Low.
<i>Corethrogyne filaginifolia linifolia</i>	San Dieguito sand aster	Chaparral and coastal sage scrub, often in sandy or rocky soil.	None	None	4.2	No	Note detected. Low.
<i>Dichondra occidentalis</i>	Western dichondra	Shaded coastal canyons and oak woodland understory.	None	None	1B.1	Yes	Note detected. Moderate.
<i>Eryngium aristulatum prishii</i>	San Diego button celery	Vernal pools and seasonally wet meadows in coastal areas.	Endangered	Endangered	1B.1	Yes	Note detected. Low.
<i>Euphorbia misera</i>	Cliff spurge	Dry slopes and bluffs in coastal sage scrub and succulent scrub.	None	None	2B.2	Yes	Note detected. Low.
<i>Ferocactus viridescens</i>	Coast barrel cactus	Open areas of coastal sage scrub and chaparral with rocky soils.	None	None	2B.1	Yes	Note detected. Low.
<i>Hazardia orcuttii</i>	Orcutt's hazardia	Rocky slopes and bluffs in coastal sage scrub.	None	None	2B.1	Yes	Note detected. Low.
<i>Holocarpha virgata elongata</i>	Graceful tarplant	Grasslands and clay soils of foothill valleys.	None	None	1B.1	No	Note detected. Low.
<i>Horkelia cuneata puberula</i>	Mesa horkelia	Sandy openings in chaparral and coastal scrub.	None	None	1B.1	No	Note detected. Low.
<i>Isocoma menziesii decumbens</i>	Decumbent goldenbush	Dry slopes in coastal scrub and disturbed areas.	None	None	1B.2	No	Note detected. Low.
<i>Iva hayesiana</i>	San Diego marsh elder	Moist soils of coastal salt marsh and disturbed wetland edges.	None	None	2B.2	No	Note detected. Low.
<i>Lepidium virginicum robinsonii</i>	Robinson's pepper grass	Disturbed habitats, often in coastal sage scrub or grasslands.	None	None	1B.2	No	Note detected. Low.
<i>Lycium californicum</i>	California box-thorn	Coastal bluffs, dunes, and sandy washes in sage scrub.	None	None	2B.1	Yes	Note detected. Low.
<i>Microseris douglasii platycarpa</i>	Small flowered microseris	Grasslands, particularly in clay soils and vernal pool areas.	None	None	4.2	No	Note detected. Low.
<i>Monardella linoides viminea</i>	Willow monardella	Sandy washes and seasonal drainages in coastal scrub.	Endangered	Endangered	1B.1	Yes	Note detected. Low.
<i>Mucronea californica</i>	California spine flower	Sandy soils in coastal dunes and disturbed sites.	None	None	1B.1	No	Note detected. Low.

Scientific Name	Common Name	Habitat	Federal Status	State Status	CNPS	MSCP Covered	Potential to Occur
<i>Muilla clevelandii</i>	San Diego goldenstar	Vernal pools and clay soils in grasslands or sage scrub.	None	None	1B.2	Yes	Note detected. Low.
<i>Myosurus minimus apus</i>	Little mousetail	Seasonal wetlands, vernal pools, and damp grasslands.	None	None	3.1	No	Note detected. Low.
<i>Navarretia fossalis</i>	Spreading navarretia	Vernal pools and alkali seasonal wetlands.	Threatened	None	1B.1	Yes	Note detected. Low.
<i>Navarretia prostrata</i>	Prostrate navarretia	Vernal pools and clay soils in grasslands.	None	None	1B.1	Yes	Note detected. Low.
<i>Ophioglossum californicum</i>	California adder's tongue fern	Moist grasslands, vernal seeps, and woodland edges.	None	None	2B.2	No	Note detected. Low.
<i>Opuntia parryi serpentina</i>	Snake cholla	Rocky slopes in chaparral and coastal sage scrub.	None	None	1B.1	No	Note detected. Low.
<i>Pentachaeta aurea</i>	Golden-rayed pentachaeta	Open grasslands and clay soils in foothill valleys.	None	None	1B.2	No	Note detected. Low.
<i>Phacelia stellaris</i>	Brand's phacelia	Sandy soils in coastal dunes and bluffs.	None	None	1B.1	Yes	Note detected. Low.
<i>Piperia cooperi</i>	Cooper's rein orchid	Open woodlands, chaparral, and grasslands.	None	None	4.2	No	Note detected. Low.
<i>Seleginella cinerascens</i>	Mesa club moss	Dry slopes in chaparral, coastal scrub, and grasslands.	None	None	4.2	No	Note detected. Moderate.
<i>Vieguiera laciniata</i>	San Diego sunflower	Coastal sage scrub and grasslands with sandy soils.	None	None	4.2	No	Note detected. Low.

May 25, 2024

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### **2024 Survey Results Coastal California Gnatcatcher Surveys for the Balaz Property, San Diego County, California**

Dear Ms. Love:

This letter presents the results of the U.S. Fish and Wildlife Service (USFWS) 2024 protocol presence/absence survey of the federally listed coastal California gnatcatcher (*Poliioptila californica californica*; CAGN) conducted for Klutz Biological Consulting for the Balaz Project (Assessor Parcel Number 267-14-706-00) in San Diego County, California (Figure 1).

#### **PROJECT LOCATION**

The study area is located west of Camino Del Sur, north of Artesian Road and south of Top of the Morning Way (Figure 1). The project elevation ranges from approximately 400-feet above mean seal level (AMSL) to 460-feet AMSL. The study area is moderately sloped from the southwest to the northeast. The property is situated in Section 26 of Township 12 South, Range 2 West on the Rancho Santa Fe U.S. Geological Survey 7.5-minute quadrangle map (Figure 1).

#### **HABITAT DESCRIPTION**

The Balaz property supports Diegan coastal sage scrub (DCSS), disturbed Diegan coastal sage scrub (DDCSS), non-native grassland (NNG), riparian scrub (RS), eucalyptus woodland (EW), disturbed habitat (DH) and developed lands (DL). Of these land cover types, DCSS, DDCSS, and RS are suitable CAGN habitats on site and consist of approximately 1.5 acres of Diegan coastal sage scrub (DCSS and DDCSS combined) and 0.1 acres of riparian scrub. The DCSS consists of California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), white sage (*Salvia apiana*), deerweed (*Acmispon glaber*), and sugar bush (*Rhus ovata*). The understory supports native wildflowers such as golden stars (*Bloomeria crocea*), blue-eyed grass (*Sisyrinchium bellum*), California everlast (*Gnaphalium californicum*), and blue dicks (*Dichlostema capitatum*). The DDCSS contains single stand-alone shrubs that are found in the DCSS

and the DDCSS understory has non-native annual species including filaree (*Erodium cicutarium*) and prickly lettuce (*Lactuca serriola*) and non-native grasses are also found in the understory. On-site RS is dominated by coyote bush (*Baccharis pilularis*) and mule-fat (*Baccharis salicifolia*) shrubs.

## METHODS

The surveys consisted of three site visits conducted by permitted biologist Antonette Gutierrez (TE-50992B-2) in accordance with the current U.S. Fish and Wildlife Service (USFWS) Coastal California Gnatcatcher (*Poliophtila californica californica*) Presence/Absence Survey Protocol for the CAGN (USFWS 1997). The surveys were conducted on foot by meandering through suitable CAGN habitat. The survey route covered all habitat with potential for occupancy by CAGN. All surveys were conducted with binoculars to aid in bird detection. The CAGN surveys were conducted between March and April 2024 Table 1 details the survey dates, times, and conditions.

**Table 1. Summary of Survey Dates, Times, Conditions, and Biologists**

Survey Date	Start Time (Hours)	Conditions	Permitted Biologist
14 March 2024	0900-1000	Weather: 95% - 100%cc Wind: 4 MPH Air Temperature: 59° F	Antonette Gutierrez
28 March 2024	0945-1045	Weather: 100% cc- 75% cc Wind: 1-2 MPH Air Temperature: 63° F	Antonette Gutierrez
12 April 2024	1000-1100	Weather: 100% cc Wind: 1-2 MPH Air Temperature: 62° F-63° F	Antonette Gutierrez

**cc** – cloud cover; **MPH** – miles per hour; **° F** – degrees Fahrenheit

## RESULTS

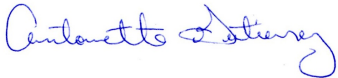
The Balaz property supports low quality CAGN habitat. On site suitable CAGN habitat consists of patchy stands of shrubs that are disconnected by a mosaic of non-native grasslands. The site is surrounded by developed lands with no suitable CAGN habitat found adjacent to the property. No CAGN were documented on site during the 2024 focused surveys.

Additional avian and incidental species detected during the survey are attached.

## CERTIFICATION

I certify that the information in this survey report fully and accurately represents my work. Please contact me at (808) 542-2941 or via email [gutierrezantonette4@gmail.com](mailto:gutierrezantonette4@gmail.com) if you have any questions.

Respectfully,



Antonette Gutierrez, Principal Investigator  
USFWS Permit TE-50992B-2

### **References Cited**

USFWS. 1997. Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. July 28, 1997.

USFWS. 2007. Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Coastal California Gnatcatcher (*Polioptila californica californica*); Final Rule. Federal Register 72:72009-72213.



## Representative Photos



Balaz property disturbed Diegan coastal sage scrub.



Balaz property disturbed Diegan coastal sage scrub.



Balaz property Diegan coastal sage scrub and riparian scrub habitats.

## Wildlife Species Detected 2024

Scientific Name	Common Name
<i>Buteo jamaicensis</i>	Red-tailed hawk
<i>Buteo lineatus</i>	Red-tailed hawk
<i>Accipiter cooperii</i>	Cooper's hawk (WL)
<i>Charadrius vociferus</i>	Killdeer
<i>Pheucticus melanocephalus</i>	Black-headed grosbeak
<i>Cathartes aura</i>	Turkey vulture
<i>Zenaida macroura</i>	Mourning dove
<i>Corvus brachyrhynchos</i>	American crow
<i>Corvus corax</i>	Common raven
<i>Haemorhous mexicanus</i>	House finch
<i>Spinus psaltria</i>	Lesser goldfinch
<i>Stelgidopteryx serripennis</i>	Northern rough-winged swallow
<i>Psaltiriparus minimus</i>	Bushtit
<i>Icterus cucullatus</i>	Hooded oriole
<i>Molothrus ater</i> *	Brown-headed cowbird*
<i>Mimus polyglottos</i>	Northern mockingbird
<i>Toxostoma redivivum</i>	California thrasher
<i>Oreothlypis celata</i>	Orange-crowned warbler
<i>Setophaga coronata</i>	Yellow-rumped warbler
<i>Melospiza melodia</i>	Song sparrow
<i>Melospiza crissalis</i>	California towhee
<i>Pipilo maculatus</i>	Spotted towhee
<i>Zonotrichia leucophrys</i>	White-crowned sparrow
<i>Passer domesticus</i> *	House sparrow*
<i>Sturnus vulgaris</i> *	European starling*
<i>Calypte anna</i>	Anna's hummingbird
<i>Selasphorus sp</i>	Allen's or rufous hummingbird
<i>Thryomanes bewickii</i>	Bewick's wren
<i>Troglodytes aedon</i>	House wren
<i>Chamaea fasciata</i>	Wrentit
<i>Sayornis nigricans</i>	Black phoebe
<i>Tyrannus vociferans</i>	Cassin's kingbird
<i>Bombus crotchii</i>	Crotch's bumblebee (CCESA)
<i>Bombus californicus</i>	Yellow bumblebee
<i>Bombus melanopygus</i>	Black-tailed bumblebee

Scientific Name	Common Name
<i>Bombus vosnesenskii</i>	Vonsnesenski's bumblebee
<i>Pseudacris hypochondriaca</i>	Baja California tree frog
<i>Sceloporus occidentalis</i>	Western fence lizard
<i>Canis latrans</i>	Coyote
<i>Otospermophilus beecheyi</i>	California ground squirrel

WL: California Watch List species

FT: Federally listed as Threatened

SSC: California Species of Special Concern

CCESA: Candidate Species for California Endangered Species

\*Introduced species



## Appendix F Proposed Habitat & California Adolphia Mitigation Approach

As detailed in the project's biological letter report, habitat impacts will occur to approximately 1.53 acres of Diegan Coastal Sage Scrub (DCSS), 0.6 acre of non-native grassland (NNG), 0.07 acre of riparian scrub (RS), and 0.1 acre of eucalyptus woodland (EW) as a result of the proposed residential development. In addition to these habitat impacts, 18 California adolphia (*Adolphia californica*) plants will be indirectly impacted and as a result will require species-specific mitigation at a 1:1 ratio. The following outlines a conceptual approach to mitigate project impacts to habitats and to California adolphia.

### Habitat Mitigation Approach

Habitat impacts will be mitigated through the purchase of mitigation credits at the South County MSCP approved Willows Mitigation Bank and at the North County Mitigation Parcel (NCMP) (Assessor Parcel Number (APN) 264-11-107) (Figures 1 and 2). The NCMP is located approximately 3 miles north of the proposed project site (Balaz Project). It is currently surrounded on all sides by previously conserved lands that are managed by the Center for Natural Lands Management (CNLM) and the Escondido Creek Conservancy (ECC).

The project team has engaged both the CNLM and ECC to determine their interest in taking on the management of the NCMP. CNLM has not yet officially responded but has verbally expressed interest. The ECC has officially responded and has outlined the following terms:

- One-time payment in the amount of \$60,000 for preserve management
- ECC would take title with an easement granted to the County of San Diego
- Project applicant/proponent would process a lot-line adjustment which would include transferring title and recording the biological conservation easement (BCE)

The NCMP is approximately 0.99-acre in size and contains Southern Maritime Chaparral (SMC, Tier I, 0.36-ac) and Diegan Coastal Sage Scrub (DCSS, Tier II, 0.63-ac) habitat (Figures 1 & 2). As detailed in Table 1, 0.99-acre of habitat mitigation is proposed at the NCMP. This includes using 0.14-acre of Tier I credits for impacts to Riparian Scrub and a combination of Tier I and Tier II credits (0.85-acre) for impacts to DCSS.

The remaining habitat mitigation credits would be satisfied by purchasing Tier II and Tier III credits at the Willows Mitigation Bank. Table 1 below details the habitat impacts and mitigation proposed at each of the two mitigation locations.

**Table 1 Balaz Habitat Mitigation**

Habitat	Project Impacts (acres)	Ratio	Mitigation Requirement	North County Mitigation Parcel (acres)	South County Willows Bank (acres)
Riparian Scrub (Tier I)	0.07	2:1	0.14	0.14	0
Diegan Coastal Sage Scrub (TierII)	1.53	1:1	1.53	0.85*	0.68
Non-native Grassland (Tier III)	0.6	0.5:1	0.3	0	0.3
Totals	2.2	NA	1.97	0.99*	0.98
* = includes up tiering with excess SMC at the NC Mitigation Parcel					

### California Adolphia Mitigation Approach

The California adolphia mitigation approach includes the purchase of a conservation easement at the NCMP (Figures 1 & 2). The NCMP property contains approximately 44 California adolphia plants, as well as two other sensitive plant populations: wart-stem lilac (*Ceanothus verrucosus*, co-dominant within the SMC) and ashy spike moss (*Selaginella cinerascens*) (Figure 2). If implemented, the effective mitigation ratio for California adolphia would be 2.4:1.

Additional details and requirements include:

- Purchase of mitigation credits from the current property owner and recordation of a biological conservation easement (see terms outline above by the ECC).
- County and Wildlife Agency approval to allow mitigation of species impacts within the NC MSCP Plan Area, rather than within the South County MSCP (SC MSCP) planning area.
- No additional long-term management actions would be required, aside from integration of the property within the ECC existing management programs.

