County of San Diego

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DIRECTOR

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

DATE (To Be Determined)

Craig Meredith
1923 Dentro De Lomas
Bonsall, CA 92003

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Habitat Loss Permit

APPLICATION NUMBER: HLP XX-XXX

ASSOCIATED PERMIT(S): PDS2022-LDGRMN-20336

NAME OF APPLICANT: Craig Meredith

DESCRIPTION/LOCATION OF LOSS:

The proposed project is a Minor Grading Permit to rectify a violation for unauthorized grading. The proposed project is located at 1923 Dentro De Lomas in the North County Metropolitan Subregional Planning area, within the unincorporated portion of northern San Diego County. The project location is indicated on the attached USGS map. The project will remove 3.76 acres of coastal sage scrub habitat as shown on the attached Habitat Loss Exhibit.

Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Vince Scheidt (January 2024). The site primarily consisted of row crops, coastal sage scrub, riparian, and urban/developed habitat. No special status plant or wildlife species were observed on the project site. Protocol coastal California gnatcatcher surveys were not

conducted as this project is a violation case and the impacts have already occurred to suitable habitat.

The Diegan coastal sage scrub habitat was considered to be of Intermediate Quality as determined by the criteria established under the Natural Community Conservation Planning (NCCP) Logic Flow Chart. Impacts and mitigation ratios are listed in Table 1. Therefore, all impacts associated with the development of the Meredith Minor Grading project have been mitigated to a level below significance. The proposed project is in conformance with all standards and guidelines outlined in the NCCP Process Guidelines.

Table 1. Habitat, Impacts, and Mitigation

Habitats	Total Habitat Onsite	Impacts Onsite	Mitigation Ratio	Offsite Mitigation
Urban/Developed	7.77	7.77	N/A	N/A
Row Crop	3.43	3.43	N/A	N/A
Riparian	0.45	0.45	3:1	1.35
Coastal sage scrub	3.76	3.76	5:1	18.8
Total	15.41	15.41	--	20.15

DECISION:

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

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

2. Granting concurrence through written notification to the County prior to the conclusion of the 30-day period, initiated by their receipt of this decision, that the project is consistent with the Southern California CSS NCCP Process Guidelines or any approved subregional mitigation guidelines.

Pending the issuance of an associated Grading Permit, Clearing Permit or Improvement Plan from the County of San Diego, this Habitat Loss Permit acknowledges the loss of the above-described coastal sage scrub habitat that was previously cleared, graded, or removed without a valid permit (see attached Habitat Loss Exhibit). However, no take authorization for incidental take of sensitive species, including the California gnatcatcher, shall be conveyed by the County of San Diego for previous clearing, grading, or removal of coastal sage scrub habitat that was accomplished without a valid permit or authorization.

This Habitat Loss Permit cannot be relied upon for the clearing, grading, or removal of any vegetation until a valid Grading Permit, Clearing Permit or Improvement Plan has been issued from the County of San Diego authorizing such vegetation removal. Furthermore, use and reliance upon this Habitat Loss Permit cannot occur until all of the

requirements as specified within the "Conditions of Approval" section of this permit have been satisfied.

CONDITIONS OF APPROVAL:

The following conditions are being placed on PDS2022-LDGRMN-20336. For the final Habitat Loss Permit, the list of conditions will be modified to require satisfaction of all conditions prior to use and reliance on the HLP.

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

1. **BIO#1–COASTAL SAGE SCRUB OFFSITE MITIGATION [PDS, FEE X2]**
INTENT: In order to mitigate for the impacts to coastal sage scrub, which is a sensitive biological resource pursuant to the Resource Protection Ordinance (RPO) and the County's Guidelines for Determining Significance for Biological Resources, offsite mitigation shall be acquired. **DESCRIPTION OF REQUIREMENT:** The applicant shall purchase habitat credit or provide for the conservation of habitat of 18.8 acres (5:1 ratio) of coastal sage scrub, located within a County approved mitigation bank, such as the Red Mountain Mitigation Bank, as indicated below:

    a. **Option 1:** If purchasing Mitigation Credit, the mitigation bank shall be approved by the California Department of Fish & Wildlife. The following evidence of purchase shall include the following information to be provided by the mitigation bank:

        1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.

        2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.

        3. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.

        4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by this project and the amount remaining after utilization by this project.

    b. **Option 2:** If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the conservation habitat of the same amount and type of land located in San Diego County as indicated below:

        1. Prior to purchasing the land for the proposed mitigation, the location should be pre-approved by [PDS].

        2. A Resource Management Plan (RMP) shall be prepared and approved pursuant to the County of San Diego Biological Report Format and Content Requirements to the satisfaction of the Director of PDS. If the offsite mitigation is proposed to be managed by DPR, the RMP shall also be prepared and approved to the satisfaction of the Director of DPR.

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3. An open space easement over the land shall be dedicated to the County of San Diego or like agency to the satisfaction of the Director of PDS. The land shall be protected in perpetuity.

4. The purchase and dedication of the land and the selection of the Resource Manager and establishment of an endowment to ensure funding of annual ongoing basic stewardship costs shall be complete prior to the approval of the RMP.

5. In lieu of providing a private habitat manager, the applicant may contract with a federal, state, or local government agency with the primary mission of resource management to take fee title and manage the mitigation land). Evidence of satisfaction must include a copy of the contract with the agency, and a written statement from the agency that (1) the land contains the specified acreage and the specified habitat, or like functioning habitat, and (2) the land will be managed by the agency for conservation of natural resources in perpetuity.

DOCUMENTATION: The applicant shall purchase the offsite mitigation credits and provide the evidence to the *[PDS, PCC]* for review and approval. If the offsite mitigation is proposed to be owned or managed by DPR, the applicant must provide evidence to the [PDS PCC] that [DPR, GPM] agrees to this proposal. It is recommended that the applicant submit the mitigation proposal to the *[PDS, PCC],* for a pre-approval. If an RMP is going to be submitted in-lieu of purchasing credits, then the RMP shall be prepared and an application for the RMP shall be submitted to the *[PDS, ZONING].* **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the mitigation shall occur. **MONITORING:** The *[PDS, PCC]* shall review the mitigation purchase for compliance with this condition. Upon request from the applicant *[PDS, PCC]* can pre-approve the location and type of mitigation only. The credits shall be purchased before the requirement can be completed. If the applicant chooses option #2, then the *[PDS, ZONING]* shall accept an application for an RMP, and *[PDS, PPD] [DPR, GPM]* shall review the RMP submittal for compliance with this condition and the RMP Guidelines.

2. **BIO#2–RIPARIAN OFFSITE MITIGATION [PDS, FEE X2]**

INTENT: In order to mitigate for the impacts to riparian habitat, which is a sensitive biological resource pursuant to the Resource Protection Ordinance (RPO) and the County's Guidelines for Determining Significance for Biological Resources, offsite mitigation shall be acquired. **DESCRIPTION OF REQUIREMENT:** The applicant shall purchase habitat credit or provide for the conservation of habitat of 1.35 acres (3:1 ratio) of riparian habitat, located within a County approved mitigation bank, such as the San Luis Rey Mitigation Bank, as indicated below:

a. **Option 1:** If purchasing Mitigation Credit, the mitigation bank shall be approved by the California Department of Fish & Wildlife. The following evidence of purchase shall include the following information to be provided by the mitigation bank:

1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.

2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.

3. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.

4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by this project and the amount remaining after utilization by this project.

b. **Option 2:** If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the conservation habitat of the same amount and type of land located in San Diego County as indicated below:

1. Prior to purchasing the land for the proposed mitigation, the location should be pre-approved by [PDS].

2. A Resource Management Plan (RMP) shall be prepared and approved pursuant to the County of San Diego Biological Report Format and Content Requirements to the satisfaction of the Director of PDS. If the offsite mitigation is proposed to be managed by DPR, the RMP shall also be prepared and approved to the satisfaction of the Director of DPR.

3. An open space easement over the land shall be dedicated to the County of San Diego or like agency to the satisfaction of the Director of PDS. The land shall be protected in perpetuity.

4. The purchase and dedication of the land and the selection of the Resource Manager and establishment of an endowment to ensure funding of annual ongoing basic stewardship costs shall be complete prior to the approval of the RMP.

5. In lieu of providing a private habitat manager, the applicant may contract with a federal, state, or local government agency with the primary mission of resource management to take fee title and manage the mitigation land). Evidence of satisfaction must include a copy of the contract with the agency, and a written statement from the agency that (1) the land contains the specified acreage and the specified habitat, or like functioning habitat, and (2) the land will be managed by the agency for conservation of natural resources in perpetuity.

DOCUMENTATION: The applicant shall purchase the offsite mitigation credits and provide the evidence to the *[PDS, PCC]* for review and approval. If the offsite mitigation is proposed to be owned or managed by DPR, the applicant must provide evidence to the [PDS PCC] that [DPR, GPM] agrees to this proposal. It is recommended that the applicant submit the mitigation proposal to the *[PDS, PCC],* for a pre-approval. If an RMP is going to be submitted in-lieu of purchasing credits, then the RMP shall be prepared and an application for the RMP shall be submitted to the *[PDS, ZONING].* **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the mitigation shall occur. **MONITORING:** The *[PDS, PCC]* shall review the mitigation purchase for compliance with this condition. Upon request from the applicant *[PDS, PCC]* can pre-approve the location and type of mitigation only. The credits shall be purchased before the requirement can be completed. If the applicant chooses option #2, then the *[PDS, ZONING]* shall accept an application for an RMP, and *[PDS, PPD] [DPR, GPM]* shall review the RMP submittal for compliance with this condition and the RMP Guidelines.

GRADING PERMIT: *(Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits).*

3. **BIO#3–WETLAND PERMITS [PDS, FEE X2]**
INTENT: In order to comply with the State and Federal Regulations, the following agency permits, or verification that they are not required shall be obtained. **DESCRIPTION OF REQUIREMENT:** The following permit and agreement shall be obtained, or provide evidence from the respective resource agency satisfactory to the Director of PDS that such an agreement or permit is not required:

   a. A Clean Water Act, **Section 401/404** permits issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers for all project related disturbances of waters of the U.S. and/or associated wetlands.

   b. A **Section 1602** Streambed Alteration Agreement issued by the California Department of Fish and Wildlife for all project related disturbances of any streambed.

   DOCUMENTATION: The applicant shall consult each agency to determine if a permit or agreement is required. Upon completion of the agency review of this project, the applicant shall provide a copy of the permit(s)/agreement(s), or evidence from each agency that such an agreement or permit is not required to the *[PDS, PCC]* for compliance. **TIMING:** Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** The *[PDS, PCC]* shall review the permits/agreement for compliance with this condition. Copies of these permits should be transmitted to the *[PDS, LDR]*, for implementation on the grading plans.

ENVIRONMENTAL FINDINGS:

A. CEQA Findings

   1. TO BE PROVIDED

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

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

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

   The proposed project will impact 3.76 acres of coastal sage scrub and no pairs of California gnatcatcher (*Polioptia californica*). Approved coastal sage scrub losses as of the date of January 29, 2024, and including this approval, for the entire unincorporated County, outside the boundaries of the Multiple Species Conservation Program (MSCP), are presented in the following table:

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Unincorporated Area Coastal Sage Scrub Cumulative Losses

Total loss allowed under five percent guideline:	2953.30 acres
Cumulative loss of Coastal sage scrub to date:	1647.23 acres
Net loss due to this project:	3.76 acres
Total cumulative loss:	1650.99 acres
Remaining loss under five percent guideline:	1302.31 acres

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

The northern portion of the project site, which contains the existing single-family home, is mapped as agriculture and high habitat value and the southern portion of the site is mapped as low habitat value on the County habitat evaluation map. Land uses to the south and southwest include single-family residences and extensive agriculture. There is also an approved porject located to the east/southeast portion of the project site. While this project is not built out, it is entitled. These surrounding land uses preclude connectivity between areas of high habitat values.

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

The project site is mapped as outside of the Pre-Approved Mitigation Area (PAMA) and has not been identified for conservation. The project site contained small areas of native habitat and a small drainage. The project site is not strategically located for preservation as it does not constitute a wildlife corridor or core area. Since the habitat is already isolated, the habitat loss will not preclude or prevent the preparation of the subregional NCCP.

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

The habitat onsite is considered of “intermediate” value, pursuant to the NCCP Logic Flow Chart, and as the site is mapped as outside PAMA, it has not been identified for conservation. Per the NCCP Logic Flow Chart, the project would be required to mitigate for impacts to coastal sage scrub at a 2:1 ratio. However, as the clearing was done in advance of permit issuance, a higher mitigation ratio is being provided in order to offset project impacts. The project will be conditioned to purchase 18.8 acres (5:1 ratio) of coastal sage scrub credits at a County approved mitigation bank. The purchase of offsite credits will provide for the long-term viability of habitat that has connectivity to high value districts. Therefore, the habitat loss has been minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the NCCP Process Guidelines.

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

No sensitive plant or wildlife species were observed onsite. The project will be required to offset impacts to coastal sage scrub through the purchase of offsite mitigation at a 5:1 ratio and riparian habitat with the purchase of offsite mitigation at a 3:1 ratio. The offsite

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habitat purchase will preserve habitat with long-term viability that has connectivity to high value districts and potential to support listed species. Therefore, with the implementation of mitigation, the project will not appreciably reduce the likelihood of the survival and recovery of listed species in the wild.

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

The issuance of a Habitat Loss Permit by the County of San Diego, with the concurrence of the Department of Fish and Wildlife and U.S. Fish and Wildlife Service and approval by the County of San Diego of a Grading Permit, Clearing Permit, or Improvement Plan is required to permit the loss of coastal sage scrub habitat that was previously cleared, graded or removed without a valid permit and to allow for conformance with Sections 86.102 and 86.104 of the San Diego County Code. Construction and/or further land use modification will not commence until all appropriate permits have been issued. As such, the anticipated loss will be incidental to "otherwise lawful activities".

NCCP FLOWCHART

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

Based on the NCCP Logic Flow Chart, the quality of habitat supported on the Meredith Minor Grading project is defined as being "Intermediate Value."

MITIGATION MONITORING AND REPORTING PROGRAM:

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

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

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

- Subsequent Project Permits

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

BIO#1-3

- Enforcement

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

  N/A

- Ongoing Mitigation

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

  N/A

NOTICE: The issuance of this permit by the County of San Diego does not authorize the applicant for said permit to violate any federal, state, or county laws, ordinances, regulations, or policies, including but not limited to, the federal Endangered Species Act and any amendments thereto.

NOTIFICATION TO APPLICANT: Because your project has an effect on native biological resources, State law requires the payment (or proof of prior payment) of a $2,916.75 (2024 fees) fee to the California Department of Fish and Wildlife for their review of the Mitigated Negative Declaration (Fish and Wildlife Code §711.4) and a $50 administrative fee to the County ($2,404.75 total). To comply with State law, the applicant must file the NOD and remit applicable fees within five (5) working days of the date of the project approval. Payment or sufficient proof of prior payment to the County Clerk is required at the time of filing. Payment may be made with cash or by check/money order made payable to the "San Diego Recorder/Clerk". American Express, Discover, MasterCard, and Visa Debit card payments are also accepted at County Administration Center with a $2.50 surcharge per transaction, and must be submitted to the Clerk at the time of filing the NOD.

JUDICIAL REVIEW TIME LIMITATIONS: The time within which judicial review of this decision must be sought is governed by Code of Civil Procedure Section 1094.6, which has been made applicable in the County of San Diego by San Diego County Code Section 11.120. Any petition or other paper seeking judicial review must be filed in the appropriate court not later than the 90th day following the date on which this decision becomes final; however, if within 10 days after the decision becomes final a request for the record of the proceedings is filed and the required deposit in an amount sufficient to cover the estimated cost of preparation of such record is timely deposited, the time within which such petition may be filed in court is extended to not later than the 30th day following the date on which the record is either personally delivered or mailed to the party, or the party's attorney of record. A written request for the preparation of the record of

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the proceedings shall be filed with the Director, Planning & Development Services, 5510 Overland Avenue, Suite 110, San Diego, California 92123.

The foregoing decision was approved by the Director of Planning & Development Services on date of decision. A copy of this decision, and the documentation supporting the decision, is on file in the Planning & Development Services office at 5510 Overland Avenue, Suite 110, San Diego, California.

PLANNING & DEVELOPMENT SERVICES
DAHVIA LYNCH, DIRECTOR

BY:
ASHLEY SMITH, Chief
Project Planning Division

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Attachments
Habitat Loss Exhibit
USGS Map
Biological Resource Letter Report (Vince Scheidt, January 2024)

cc: To be provided at issuance of Habitat Loss Permit

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Figure 1. Regional Location – Dentro De Lomas Project U.S.G.S. "Bonsall, California" 7.5′ Quadrangle

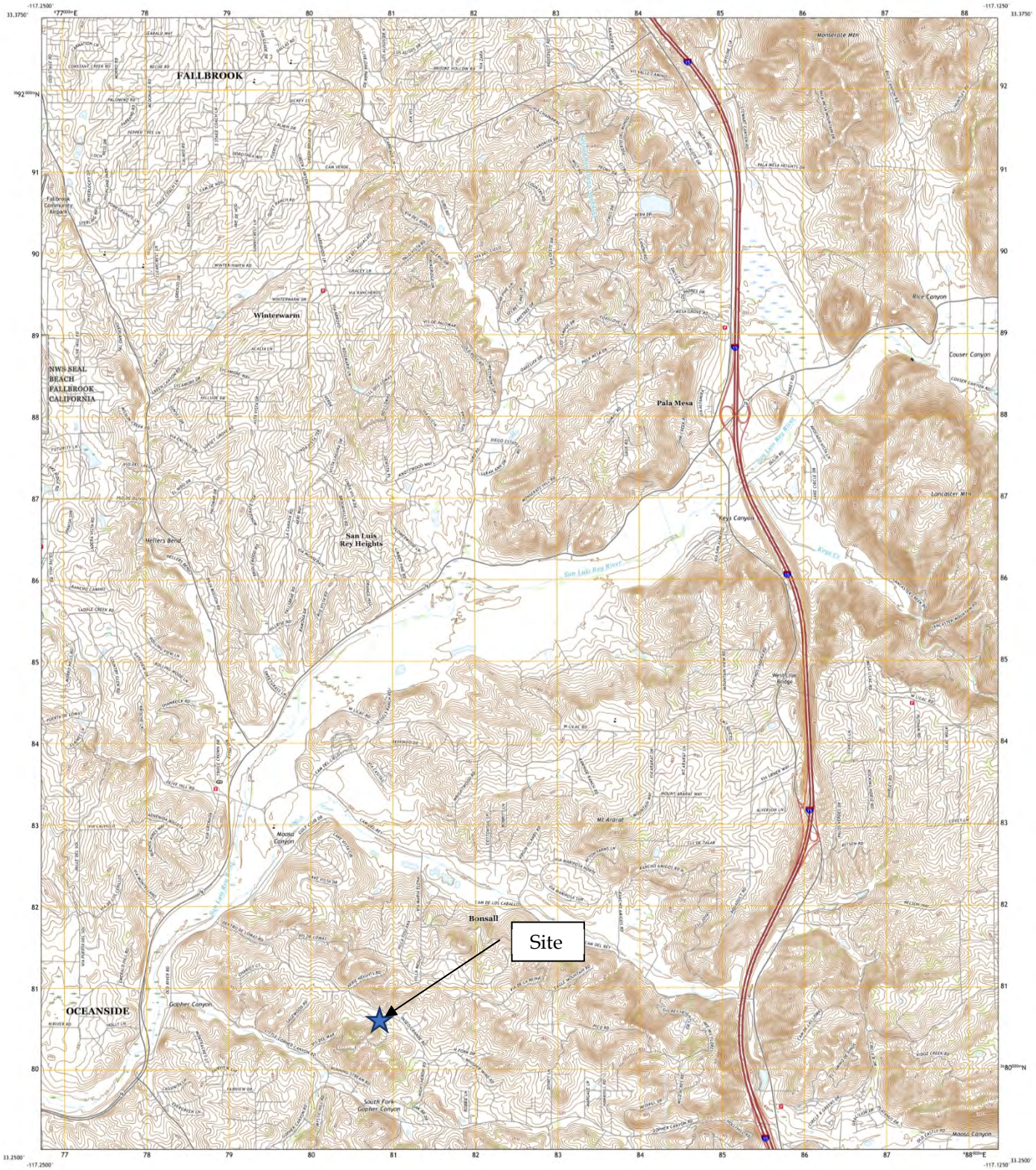
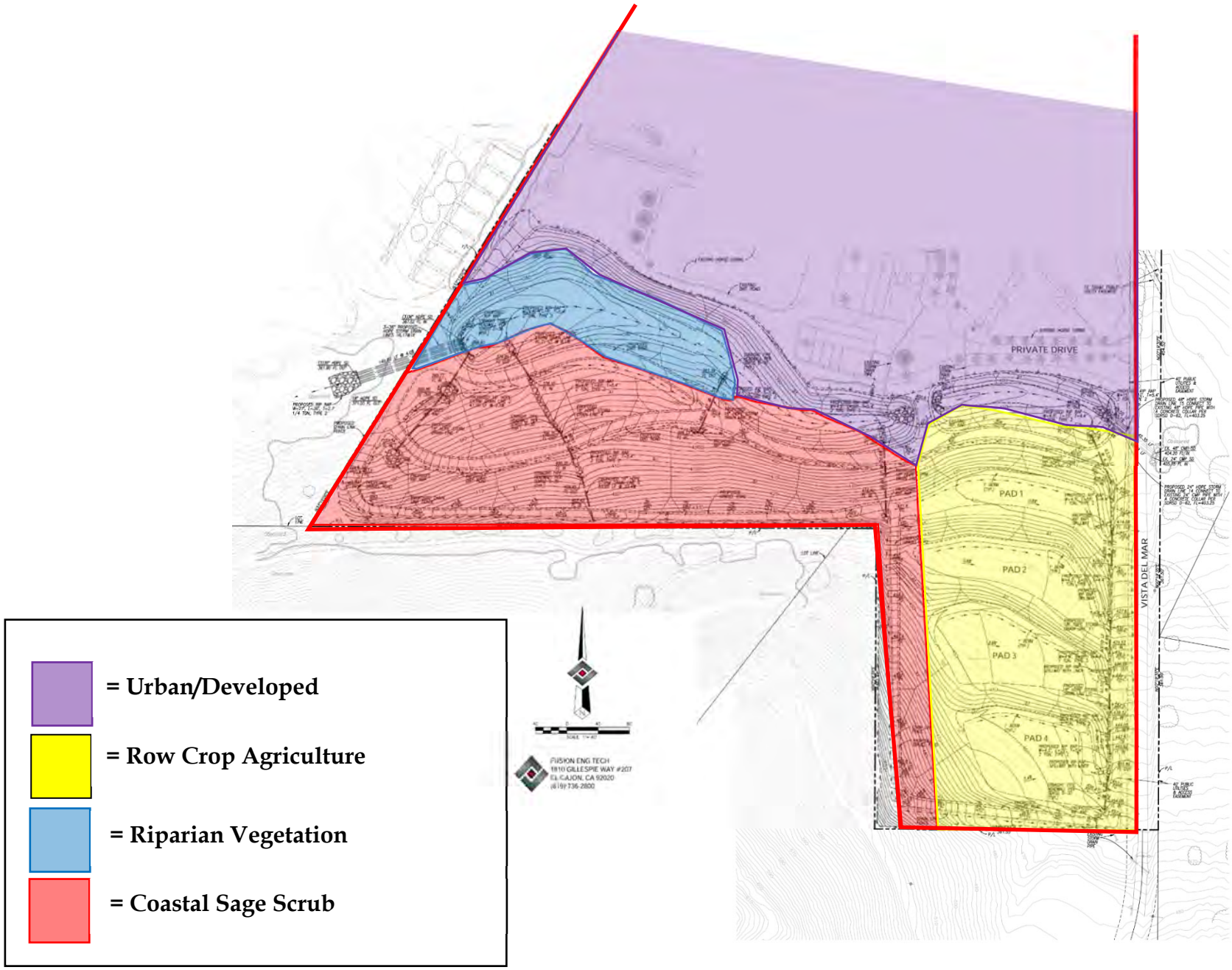


Figure 4. Vegetation on Proposed Remedial Grading Plan – Dentro De Lomas Grading Violation Project



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BIOLOGY LETTER REPORT

Biological Resources, Project Impacts, and Proposed Mitigation
The 1923 Dentro De Lomas Grading Violation Project
PDS2022-LDGRMN-20336

APN 127-141-40
Applicant: Mr. Craig Meredith
1923 Dentro De Lomas
Bonsall, CA 92003

Final January 2024

Summary

The 1923 Dentro De Lomas Grading Violation Project (PDS2022-LDGRMN-20336), hereinafter referred to as "Dentro De Lomas Project", consists of an application for a retroactive grading permit from the County of San Diego. The permit is intended to rectify a violation in connection with impacts that were caused by unauthorized grading. The Dentro De Lomas Project site currently supports Urban Developed Habitat in the form of a residential development, associated improvements, and extensive landscaping. A forensic assessment of the property was conducted to determine the onsite habitats present onsite prior to grading in 2020. The assessment shows the Dentro De Lomas Project site supported Urban Developed Habitat, Riparian Vegetation, Row Crop Agriculture, and Diegan Coastal Sage Scrub prior to grading. Unauthorized grading resulted in direct habitat impacts. Significant impacts identified can be reduced to less than significant with the purchase of offsite habitats at an approved mitigation bank. Finally, an avian nesting survey and/or seasonal restrictions on site development are recommended, should any additional grading be required, to ensure project consistency with the Migratory Bird Treaty Act and the California Fish and Game Code.

Introduction, Project Description, Location, and Regulatory Setting

The Dentro De Lomas Project is an application for a grading permit from the County of San Diego to rectify a violation in connection with recent unauthorized grading on a 15.41-acre parcel (APN 127-141-40) located at 1923 Dentro De Lomas in the North County Metropolitan Subregional Planning area. This is within the community of Bonsall in unincorporated San Diego County. Zoning for the site is Rural Residential (RR). The site is partially developed with a single-family residence and equestrian facilities. The northern portion of the property was originally cleared as early as the 1930's, with development starting in the early 1980's. In 2009 various areas on the southern half of the property were cleared (Figure 2b) and agriculture was established on the southeast portion of the property (Figure 2c). In 2020, the entire southern half of the property was cleared and terraced, converting the property into its current condition (Figure 2d). The baseline for this forensic evaluation can be seen comparing Figure 2c and 2d.

Two soil-types are found onsite. These are Placentia sandy loam, 5 to 9 percent slopes, eroded (PeC2), and Friant rocky fine sandy loam, 30 to 70 percent slopes (FxG). These soil types are not known to support specific edaphic rare or endangered plant species and no sensitive plants were found on the Dentro De Lomas Project site during the survey. Due to the disturbed condition of the majority of the property and the development of the surrounding area, no sensitive species are expected. Elevations on the property range between approximately 370 feet and 475 feet MSL.

The site is located within the County's draft North County Multiple Species Conservation Program (MSCP) Subarea Plan, outside lands designated as Pre-Approved Mitigation Areas (PAMA). There are conserved lands adjacent to the property to the east (Figure 5). The vegetation/habitat types currently on the property are effectively 100 percent disturbed and/or developed at this time. The project must comply with the County's Guidelines for Determining Significance: Biological Resources.

Methods

The author (Vince Scheidt) conducted a field survey of the property on July 6, 2022 from 11:30 to 13:00. Weather conditions during the survey included temps in the high 70^{o}s, clear skies, and no significant wind.

All plants, animals, and habitats encountered during the survey were recorded in the field. Adjoining offsite areas were examined concurrent with the baseline site surveying. The limits of each habitat-type were mapped in the field utilizing a recent aerial photograph of the property. All plants and animals identified in association with the project site are listed in Table 1, attached. Plants were identified in situ, or based on characteristic floral parts collected and later examined in detail. Floral nomenclature used in this letter follows Hickman (1993) and others. Plant communities, as designated by numerical code, follow Holland (1996, as amended). Wildlife observations were made opportunistically. Binoculars were used to aid in observations and all wildlife species detected were noted. Animal nomenclature used in this report is taken from Stebbins (2003) for reptiles and amphibians, American Ornithologist's Union (1998, as updated) for birds, and Jones, et. al (1992) for mammals.

Vegetation Communities, Flora/Fauna, and Special Status Species

The Dentro De Lomas Project site currently supports a single plant association. This is Urban/Developed Habitat. Prior to clearing, the site supported four generally discrete plant associations or habitats. These are Urban Developed Habitat, Riparian Vegetation, Row Crop Agriculture, and Diegan Coastal Sage Scrub (Figures 3 and 4), as reflected below. Each of these habitats have been evaluated as either "sensitive" or "not sensitive" per the County's Biology Guidelines.

Vegetation Communities

Urban/Developed Habitat - Holland Code 12000 – 7.77 acres (forensic)
Urban/Developed Habitat (UD) is present on the northern half of the property. This habitat consists of a single-family residence and associated infrastructure improvements, landscaping, etc. plus equestrian facilities and associated improvements. UD is not considered a sensitive resource in San Diego County, as defined by the County's Biology Guidelines. The biological resource value of this habitat is low and this habitat-type is long established on the subject property.

Row Crops - Holland Code 18320 – 3.43 acres (forensic)
Row Crops (Agriculture) was formerly found on the southeast portion of the property. This consisted of a vineyard with rows of trellises growing grape vines. Areas of RCA extend offsite on adjoining properties. RCA is not considered a sensitive biological resource in San Diego County, as defined by the County's Biology Guidelines. The biological resource value of this habitat was low.

Diegan Coastal Sage Scrub - Holland Code 32500 – 3.76 acre (forensic)
The slopes of the southern half of the property supported Diegan Coastal Sage Scrub (CSS). Indicators from adjoining offsite areas include California Sagebrush *(Artemisia californica)*, Flat-top Buckwheat *(Eriogonum fasciculatum)*, Laurel Sumac *(Malosma laurina)*, and other soft-woody shrubs. CSS is considered a sensitive biological resource in San Diego County, as defined by the County's Biology Guidelines. The biological value of this habitat-type was moderate due to the disjunct distribution in the immediate area south of the property.

Riparian Vegetation - Holland Code 60000 – 0.45 acre (forensic)
The western portion of the onsite drainage supported Riparian Vegetation (RV). Evidence from the surrounding areas show this area likely supported various hydrophytes, including native willows *(Salix)*, along with non-native species such as Eucalyptus, Palms, and other non-natives. RV is considered a sensitive biological resource in San Diego County, as defined by the County's Biology Guidelines and the RPO. The biological value of this habitat-type was moderate due to the number of non-native species within the immediate area.

Flora and Fauna

Nine species of vascular plants and three species of vertebrate animals were observed during the field survey of the Dentro De Lomas Project site. The site itself supported only landscaping and related plants, which were not inventoried, so the species observed were found around the periphery of the property, including at the southern edge where native indicators were present immediately offsite. A list of the plants and animals observed, presented alphabetically, can be found in Table 1, attached. This list would be expected to represent only about 10 percent of the native and naturalized plants formerly occurring on this property. At least dozens of species of animals are expected to use the site, at least on an occasional basis.

Special Status Species

No special status or "sensitive" plant species were observed on the property during the field survey. Sensitive plants are those listed as "Rare", "Endangered", "Threatened", "of Special Concern", or otherwise considered noteworthy by the County of San Diego, the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and/or the California Native Plant Society.

Sensitive plants known from the general vicinity of the property, along with an assessment of the probability of occurrence onsite, are presented in tabular form in Table 3, attached. Most of these are either associated with habitats not found here (such as vernal pools or native grasslands) or are large and distinctive perennials, which would not have been missed if encountered onsite. A few had a limited potential to occur onsite.

No sensitive animal species were detected during the field survey. Sensitive animals are those listed as "Rare", "Endangered", "Threatened", "of Special Concern" or otherwise considered noteworthy by the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the County of San Diego. Sensitive

animals known from the vicinity, along with an assessment of the probability of occurrence onsite, are presented in Table 3.

The majority of the Dentro De Lomas Project site supports potential raptor foraging habitat. However, no raptors were detected, and no raptor nesting is anticipated due to the overall developed nature of the project site and surrounding area.

Some sensitive animal species with a moderate probability of occurring onsite, on at least an occasional basis, include Cooper's Hawk *(Accipiter cooperii)* and possibly other wide-ranging species (such as native bats) which might fly over the property on occasion. Others sensitive animals (such as certain cryptic reptiles) are also possible, although these would be common to most properties in the area, and no populations or significant numbers are expected.

Jurisdictional Wetlands and Waterways

A watercourse is present on the property - in the central portion to the south of the residential area. The onsite drainage currently qualifies as an upland swale, only likely carrying flows during significant rain events. The project proposes improvements to the onsite drainage to accommodate heavy storm events.

The onsite watercourse likely qualifies as "waters" of the state based on forensic evidence prior to grading. Forensic evidence indicates that this feature supported at least some riparian vegetation and offsite areas to the west are well-vegetated with a combination of hydrophytes and noxious invasives. As "waters", the drainage is a regulated resource subject to state clearances associated with the clearing and any drainage improvements, as proposed.

Other Unique Features/Resources

Because of the property's size and mostly-disturbed nature, it lacks unique features or resources that would enhance its local or regional biological significance. The central portion of the property, supporting the main onsite drainage, could function as a local wildlife corridor, providing low lying area for animals that move up and down along the drainage. However, there is little potential for large mammals to use the site, other than urban-tolerant species (skunks, coyotes, etc.) Also, for these reasons, there is little potential for native wildlife nursery sites to be present on the property.

Project NCCP Compatibility

The conversion of native and naturalized habitats in the unincorporated County of San Diego is currently regulated through its Multiple Species Conservation Program (MSCP) Subarea Planning efforts in compliance with the State of California's Natural Community Conservation Planning Act of 1991. Natural Community Conservation Planning (NCCP) is a program implemented at the local level with the goal of preserving large, connected areas of chaparral, oak woodland, coastal sage scrub and other habitats in order to preserve habitat values and reduce the endangerment of "covered" species through the retention of long-term habitat viability in biologically-significant areas of the County. An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity, including land development, agricultural conversion, and related land-use changes.

Project Compliance with the North County MSCP

The Dentro De Lomas Project is consistent with the recommendations of the Subregional (MSCP) Plan and the County of San Diego's draft North County Subarea MSCP Plan (NCMSCP). The project also complies with the requirements of the County of San Diego's interpretation of the California Environmental Quality Act (CEQA). The draft NCMSCP requires certain preserve design elements, the avoidance of certain sensitive plant species, and application of specific mitigation ratios. As proposed, the project will mitigate for impacts to native vegetation caused by the unauthorized grading. The Dentro De Lomas Project site is not located on lands designated by the draft Plan as a Pre-approved Mitigation Area (PAMA).

Significance of Project Impacts and Proposed Mitigation

Impacts associated with unauthorized grading of the Dentro De Lomas Project site are subject to review under CEQA per the County's CEQA Guidelines. This means that the County requires that all project-related impacts to the site's native and naturalized flora, fauna, and habitats be assessed, and that mitigation be provided in the instance that impacts are considered "significant", as defined by CEQA. Mitigation is designed to reduce the effects of development, keeping all impacts at a level that is "less than significant".

Direct, Indirect, and Cumulative Impacts

Measurable direct and indirect impacts have resulted from the unauthorized grading of Dentro De Lomas Project. Direct impacts result from the actual removal of habitat, plants, and animals from the site through grading and brushing clearing or thinning for fire protection purposes, agriculture, etc. These direct impacts are considered permanent, because they result in a conversion of habitats to landscaped areas, structures, parks, roads, etc. Indirect impacts also affect habitats, plants, and/or animals residing on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects". Cumulative impacts are those that contribute to the regional loss of natural resources, even though they may be minor to negligible in their own right.

Impacts to habitats were calculated forensically by determining the acreage of each habitat-type affected by onsite grading. Impacts are summarized in Table 2.

Direct Impacts

Areas of unauthorized grading on the Dentro De Lomas project site are considered impacted and could require mitigation. The following are direct impacts associated with the Dentro De Lomas Project (summarized in Table 2):

(1) Impacts from unauthorized grading of any areas formerly supporting Row Crop Agriculture and Urban Developed Habitat are considered **less than significant**, as defined by CEQA. Mitigation for these losses is not required pursuant to the County's Biology Guidelines.

(2) Impacts from unauthorized grading of 3.76 acres of Coastal Sage Scrub and 0.45 acre of Riparian Vegetation are considered **significant**, as defined by CEQA Mitigation for this potential loss of habitat is required pursuant to the County's Biology Guidelines.

Indirect Impacts

Some indirect impacts resulting from changes in land use are anticipated. These are primarily "edge effects" impacting remaining natural areas. Because the development area is already impacted to a degree by edge effects from historical use of the area for agriculture, the adjacent road, and surrounding developments, these indirect impacts are considered **less than significant.** No specific mitigation is recommended or required for indirect impacts.

Cumulative Impacts

According to Section 15130(a) of the CEQA Guidelines, cumulative impacts must be discussed when project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects.

A list of projects was assembled by reviewing County files in order to establish a biological resources cumulative study area. This area included projects impacting or potentially impacting the same or similar biological resources within one mile of the Dentro De Lomas Project site. Projects included in the biological resources cumulative study area are the subject project (PDS2022-LDGRMN-20336), PDS2022-LDGRMJ-30418, PDS2006-2700-15170, PDS2021-STP-21-024, PDS2003-2700-14446, PDS1998-2140-4736-1, PDS2023-TPM-21336, PDS2023-TM-5649, PDS2014-AD-14-018, PDS2016-MUP-16-014, PDS2004-3000-04-065, PDS2013-AD-13-026, PDS2014-LDGRMJ-00026, and PDS2010-3000-10-037. Only the first eight of these projects has a potential to impact biological resources and each of these projects includes full mitigation for their respective impacts to biological resources, as applicable. The remaining six projects will have no impact to biological resources.

The following statements are addressed in order to assess potential cumulatively considerable impacts associated with the Dentro De Lomas Project:

1. *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, or reduce the number or restrict the range of a rare or endangered plant or animal species?*

Response: The Dentro De Lomas Project impacted approximately 0.45 acres of RV and 3.76 acres of CSS. Although regulated and considered sensitive, these habitat-types remain relatively well-distributed in San Diego County. Furthermore, the habitats present on the Dentro De Lomas project site were disturbed and somewhat isolated in nature. Therefore, this project's relatively minor impacts to RV and CSS (from a regional perspective) are not considered "cumulatively considerable" when viewed in the context of the substantial acreages of these habitat-types persisting in San Diego County. Furthermore, all impacts to these habitat-types will be fully mitigated for, reducing them to below a level of significance.

2. *Does the project have impacts that are individually limited, but cumulatively considerable?*

Response: Because all project impacts will be mitigated to a level that is below significance, Dentro De Lomas project will not have cumulatively considerable impacts when viewed in connection with the effects of past

projects, the effects of other current projects, and the effects of probable future projects affecting the same resources.

Proposed Mitigation

All project impacts are considered "less than significant" assuming the adoption of the following mitigation measures (Table 2):

1. Impacts to 3.76 acres of CSS are considered significant and require in-kind mitigation. The loss of this habitat can be mitigated offsite within an approved conservation bank having a service area that includes the NCMSCP planning area, such as the nearby Red Mountain Conservation Bank. Because the project will impact CSS, a Habitat Loss Permit will need to be obtained from the County in consultation with the California Department of Fish and Wildlife and US Fish and Wildlife Service.

2. Impacts to 0.45 acre of RV are considered significant and require in-kind mitigation. The loss of this habitat can be mitigated offsite within an approved conservation bank having a service area that includes the NCMSCP planning area, such as the nearby San Luis Rey Mitigation Bank.

3. Because the Dentro De Lomas project has impacts to Waters of the State, the project will need to provide evidence of permits and/or agency clearances indicating that these permits will not be required from the San Diego Regional Water Quality Control Board and the California Department of Fish and Wildlife per Section 401 of the Clean Water Act or the Porter-Cologne Act and a 1600-series Lake and Streambed Alteration agreement per the California Fish and Game Code, respectively.

No other biological mitigation associated with the Dentro De Lomas Project is recommended at this time.

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Preparer and Persons/Organizations Contacted

Vince Scheidt
Certified Biological Consultant

Attachments

Table 1. Plants and Animals Observed
Table 2. Habitat Impacts/Mitigation Analysis
Table 3. Sensitive Species Known from the Vicinity

Figure 1. Regional Location
Figure 2a. 2008 Aerial Photo
Figure 2b. 2009 Aerial Photo
Figure 2c. 2018 Baseline Aerial Photo
Figure 2d. 2022 Current Aerial Photo
Figure 3. Biological Resources on Current Aerial Photo
Figure 4. Biological Resources on Grading Plan
Figure 5. Open Space on Adjoining Properties

Table 1. Plants and Animals Observed – Dentro De Lomas Grading Violation Project

Scientific Name	Common Name
Plants	
Artemisia californica ◇	California Sagebrush
Eriogonum fasciculatum◇	Flat-top Buckwheat
Malosma laurina◇	Laurel Sumac
Nicotiana glauca *	Tree Tobacco
Phacelia ramosissima ◇	Branching Phacelia
Salix gooddingii ◇	Goodding's Willow
Salix laevigata ◇	Red Willow
Tamarix sp. * ◇	Tamarisks
Vitis girdiana ◇	Desert Wild Grape
Reptiles	
Sceloporus occidentalis longipes	Great Basin Fence Lizard
Birds	
Carpodacus mexicanus ◇	Housefinch
Mammals	
Thomomys bottae	Valley Pocket Gopher

Total: 9 species of plants and 3 species of animals detected

* = Non-native species ◇ = Observed immediately offsite

Table 2. Vegetation Community Impact/Mitigation Analysis – Dentro De Lomas Grading Violation Project

Vegetation Community	Total Acres Onsite	Acres Impacted	Standard Mitigation Ratio	Offsite Mitigation
Urban/ Developed	7.77 acres	7.77 acres	none	none
Row Crop Agriculture (Forensic)	3.43 acres	3.43 acres	none	none
Riparian Vegetation (Forensic)	0.45 acres	0.45 acres	3:1	1.35 acres
Diegan Coastal Sage Scrub (Forensic)	3.76 acre	3.76 acres	5:1	18.8 acres
TOTALS	**15.41 acres**	**15.41 acres**	**--**	**20.15 acres**

Table 3. Sensitive Species Known from the Vicinity – Dentro De Lomas Grading Violation Project

									VEGETATION TYPE																					
Latin Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	State Threatened	State Rare	MSCP Narrow Endemic	County Sensitive Plant List	Coastal Sage Scrub	Mixed Chapparal	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	Probability of Occurrence	Factual Basis for Determination
Acanthomintha ilicifolia	San Diego Thornmint		X	X			X	A	X		X			X								X					L	1a
Adolphia californica	San Diego Adolphia							B	X		X																L	1a
Ambrosia pumila	San Diego Ambrosia	X					X	A	X		X	X										X					L	1a
Brodiaea filifolia	Thread Leaved Brodiaea		X	X			X	A			X																L	1a
Brodiaea orcuttii	Orcutt's Brodiaea							A			X	X	X	X								X					L	1a
Calandrinia breweri	Brewer's Calandrinia							D	X					X													L	1a
Camissonia lewisii	Lewis Sun Cup							C	X		X																L	1a
Ceanothus verrucosus	Wart Stemmed Ceanothus							B		X				X													L	1a
Chorizanthe procumbens	Prostrate Spineflower							n/a	X	X				X													M	2a
Clarkia delicata	Campo Clarkia							A		X			X	X													L	1a
Comarostaphylos diversifolia diversifolia	Summer Holly							A		X						X											L	1a
Convolvulus simulans	Small Flowered Morning Glory							D	X		X																L	1a
Dichondra occidentalis	Western Dichondra							D	X	X				X													L	1a
Dudleya viscida	Sticky Dudleya							A	X	X				X													L	1a
Ericameria palmeri palmeri	Palmer's Goldenbush						X	B	X			X															L	1a
Harpagonella palmeri	Palmer's Grappling Hook							D	X		X			X													L	1a
Holocarpha virgata elongata	Graceful Tarplant							D			X																L	1a
Juncus acutus leopoldii	Soutwestern Spiny Rush							D				X	X					X									L	1a
Lepidium virginicum robinsonii	Robinson Pepper Grass							A			X																L	1a

Microseris douglasii platycarpha	Small Flowered Microseris							D			X																L	1a
Navarretia fossalis	Spreading Navarretia		X					A	X		X			X								X					L	1a
Ophioglossum californicum	California Adder's Tongue Fern							D		X	X											X					L	1a
Pentachaeta aurea	Golden-Rayed Pentachaeta							D	X	X				X								X					L	1a
Piperia cooperi	Cooper's Rein Orchid							D	X	X			X														L	1a
Piperia leptopetala	Narrow-Petaled Rein Orchid							D		X			X	X	X												L	1a
Quercus engelmannii	Engelmann Oak							D				X	X														L	1a
Selaginella cinerascens	Mesa Club Moss							D	X	X				X													L	1a
Accipiter cooperi	Cooper's Hawk								X	X	X	X	X	X	X	X							X				M	2a
Accipiter striatus	Sharp-Shinned Hawk								X	X		X	X	X	X	X											L	1a
Agelaius tricolor	Tricolored Blackbird										X	X						X								X	L	1a
Aimophila ruficeps canescens	Rufous-Crowned Sparrow								X					X													L	1a
Ammodramus savannarum	Grasshopper Sparrow										X																L	1a
Amphispiza belli belli	Bell's Sage Sparrow								X	X				X													L	1a
Anniella pulchra pulchra	Silvery Legless Lizard								X		X	X													X		L	1a
Antrozous pallidus	Pallid Bat								X	X	X	X	X	X	X	X	X		X	X			X				M	2a
Aquila chrysaetos	Golden Eagle						X		X	X	X		X	X	X	X	X										L	1a
Ardea herodias	Great Blue Heron										X							X							X		L	1a
Asio otus	Long-Eared Owl											X								X							L	1a
Athene cunicularia hypugea	Burrowing Owl						X		X		X									X				X			L	1a
Bassariscus astutus	Ringtail									X		X	X	X													L	1a
Bufo microscaphus californicus	Arroyo Toad	X					X					X															L	1a
Buteo lineatus	Red-Shouldered Hawk											X	X														M	2a
Butorides striatus	Green Heron											X						X									L	1a
Campylorhynchus brunnicapillus couesi	San Diego Cactus Wren						X		X																		L	1a
Cathartes aura	Turkey Vulture								X	X	X	X	X	X	X	X											M	2a
Chaetodipus californicus femoralis	Dulzura California Pocket Mouse								X	X	X		X	X	X												L	1a
Chaetodipus fallax fallax	Northwestern San Diego Pocket Mouse								X	X	X			X					X	X							L	1a
Charina trivirgata roseofusca	Coastal Rosy Boa								X	X			X	X													M	2a
Choeronycteris mexicana	Mexican Long-Tongued Bat								X										X	X							L	1a
Circus cyaneus hudsonius	Northern Harrier								X		X							X			X					X	L	1a

Clemmys marmorata pallida	Southwestern Pond Turtle						X					X						X							X		L	1a
Cnemidophorus hyperythrus	Orange-Throated Whiptail								X	X	X	X		X													M	2a
Cnemidophorus tigris multiscutatus	Coastal Western Whiptail									X		X	X	X													M	2a
Coccyzus americanus occidentalis	Yellow-Billed Cuckoo				X		X					X															L	1a
Coleonyx variegatus abbottii	San Diego Banded Gecko								X		X			X													M	2a
Corynorhinus townsendii	Townsend's Big-Eared Bat									X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	Northern Red Diamond Rattlesnake								X	X				X			X		X								M	2a
Danaus plexippus	Monarch Butterfly									X	X		X										X				M	2a
Dendroica petechia brewsteri	Yellow Warbler											X															L	1a
Diadophis punctatus similis	San Diego Ringneck Snake								X	X		X	X	X	X	X											M	2a
Dipodomys stephensi	Stephen's Kangaroo Rat	X			X				X		X																L	1a
Elanus caeruleus	Black-Shouldered Kite										X	X															L	1a
Empidonax trailii extimus	Southwestern Willow Flycatcher	X					X					X															L	1a
Eremophila alpestris actis	Horned Lark										X												X				L	1a
Euderma maculatum	Spotted Bat											X			X	X	X			X			X				L	1a
Eumeces skiltonianus interparietalis	Coronado Skink								X		X	X	X	X	X	X	X	X									M	2a
Eumops perotis californicus	Greater Western Mastiff Bat								X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Falco columbarius	Merlin (Winter)										X										X						L	1a
Falco mexicanus	Prairie Falcon										X								X	X							L	1a
Felis concolor	Mountain Lion								X	X		X	X	X	X	X	X		X	X			X				L	1a
Gila orcutti	Arroyo Chub											X															L	1a
Ictera virens	Yellow-Breasted Chat											X															L	1a
Lanius ludovicianus	Loggerhead Shrike								X		X	X	X						X	X							L	1a
Larus californicus	California Gull (Non-Breeding)										X							X			X		X	X	X		L	1a
Lasiurus blossevillii	Western Red Bat											X	X		X	X							X				L	1a
Lepus californicus bennettii	San Diego Black-Tailed Jackrabbit								X	X	X		X	X	X	X											L	1a
Lycaena hermes	Hermes Copper								X	X				X													L	1a
Macrotus californicus	California Leaf-Nosed Bat								X	X		X							X	X							L	1a
Myotis ciliolabrum	Small-Footed Myotis									X		X	X	X	X	X	X			X			X				L	1a
Myotis yumanensis	Yuma Myotis								X	X	X	X	X	X	X	X	X	X			X	X	X		X		L	1a

Neotoma lepida intermedia	San Diego Desert Woodrat								X	X		X	X	X												L	1a
Nyctinomops macrotis	Big Free-Tailed Bat								X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		L	1a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat								X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		L	1a
Odocoileus hemionus	Southern Mule Deer								X	X	X	X	X	X	X	X	X		X	X			X			M	2a
Onychomys torridus ramona	Southern Grasshopper Mouse								X	X	X			X												L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard								X	X	X			X												L	1a
Polioptila californica californica	California Gnatcatcher		X						X																	L	1a
Rana aurora draytoni	California Red -Legged Frog		X				X					X						X				X		X		L	1a
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake								X	X				X			X									L	1a
Scaphiopus hammondii	Western Spadefoot Toad								X	X	X	X	X	X				X				X				L	1a
Sialia mexicana	Western Bluebird											X	X		X											L	1a
Taxidea taxus	American Badger								X	X	X		X	X	X		X		X	X			X			L	1a
Thamnophis hammondii	Two Stripe Garter Snake											X						X								L	1a
Thamnophis sirtalis novum	South Coast Garter Snake											X						X								L	1a
Tyto alba	Common Barn-Owl											X	X													M	2a
Vireo bellii pusillus	Least Bell's Vireo	X		X			X					X														L	1a

Probability of Occurrence Codes:
L – Low Probability
M – Moderate Probability
H – High Probability
O – Observed; see text for detailed discussion.

Factual Basis for Determination:
1a - no significant habitat (animal or plant)
1b - distinctive perennial that would not have been missed if present onsite (plant)

2a - might be expected to occur onsite based on habitat suitability and quality (plant or animal);
2b - might be expected to occur onsite, but very rare or cryptic (animal), and/or poorly known (plant or animal)

3a - nearly certain to occur onsite based on habitat suitability and quality (plant or animal)
3b - ephemeral species known from the immediate vicinity and likely to occur onsite, but seasonal in occurrence (plant)

Figure 1. Regional Location – Dentro De Lomas Project U.S.G.S. "Bonsall, California" 7.5′ Quadrangle

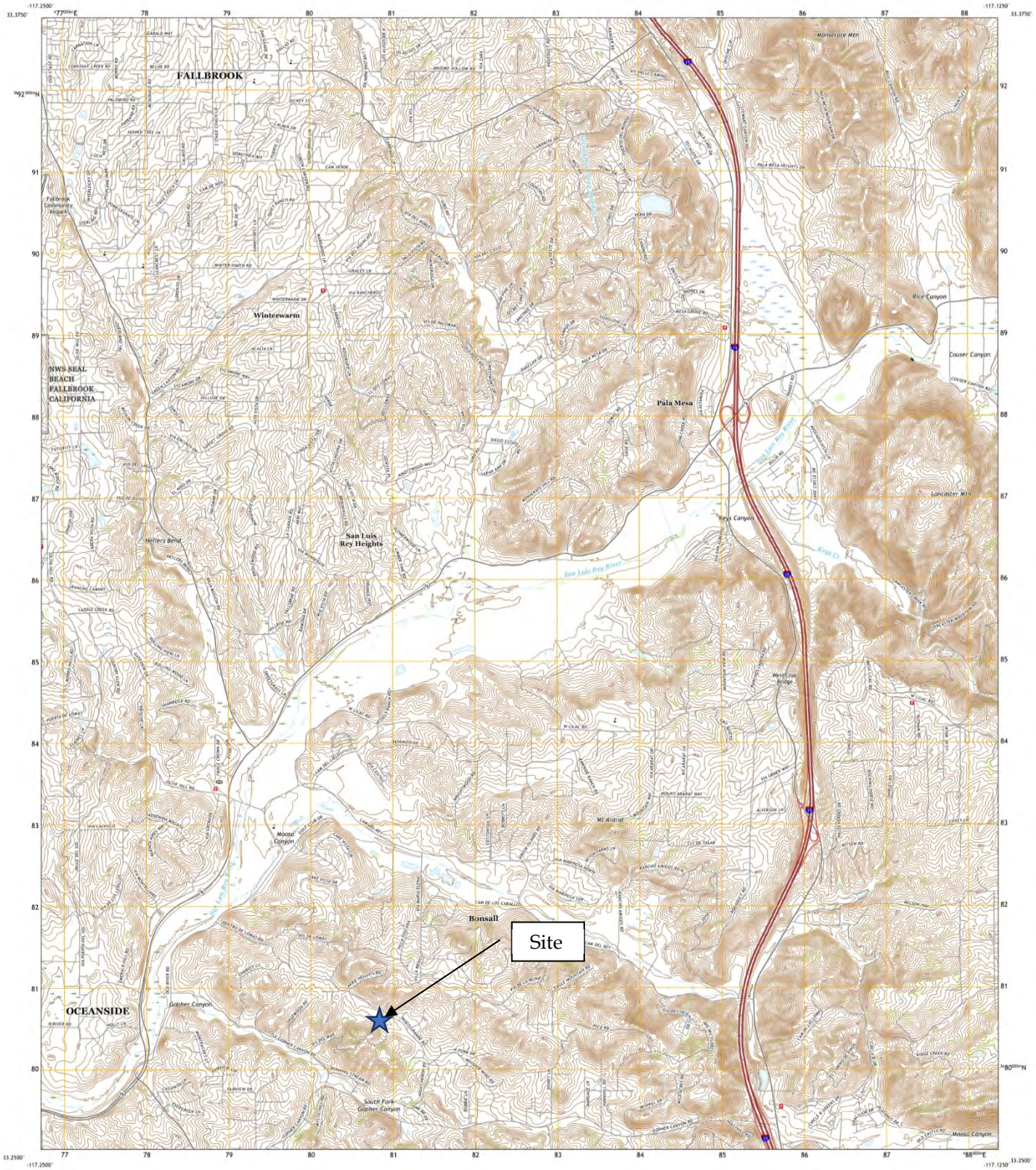

Figure 2a. Aerial Photo of Site in 2008 – Dentro De Lomas Grading Violation Project

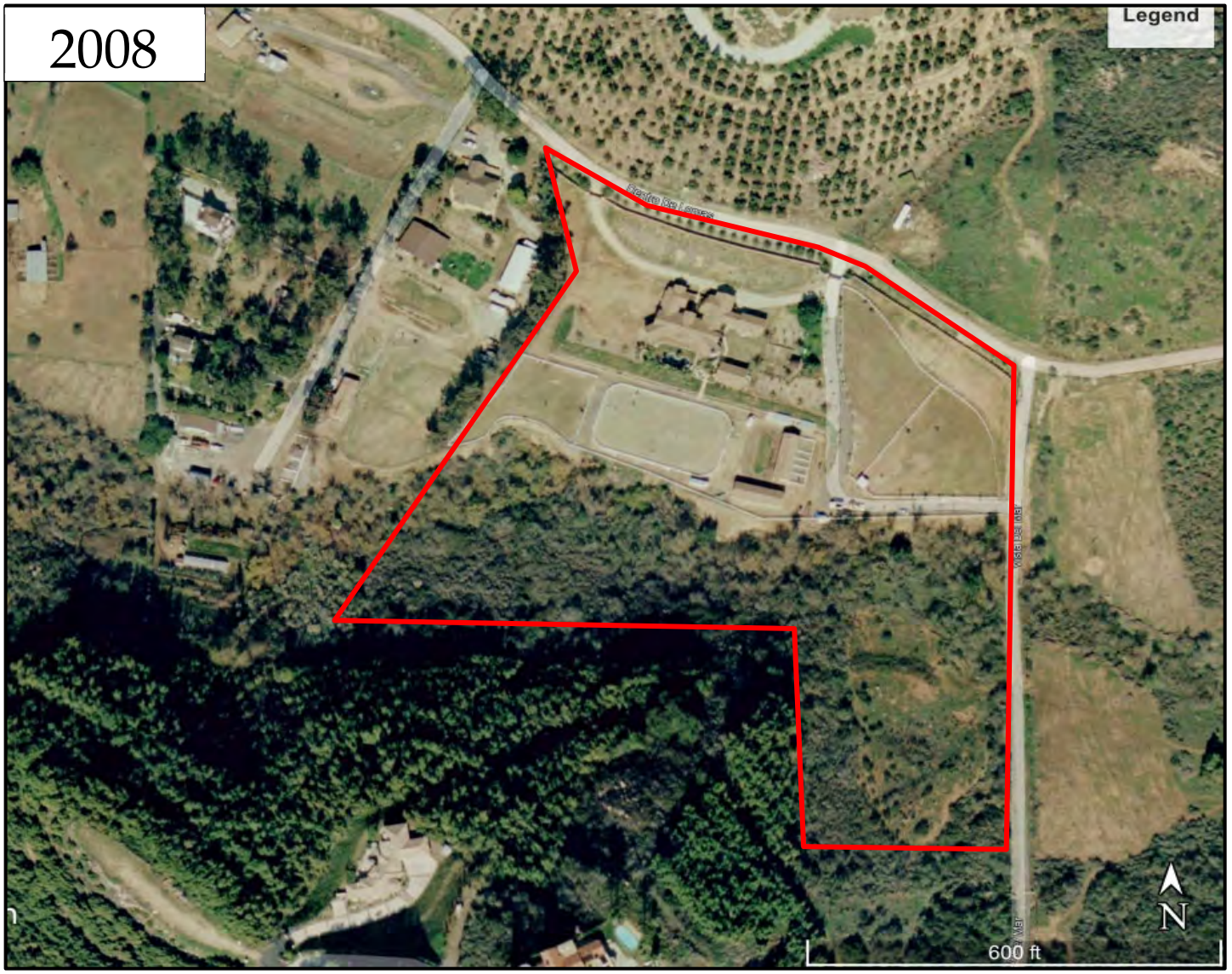

Figure 2b. Aerial Photo of Site in 2009– Dentro De Lomas Grading Violation Project

Figure 2c. Aerial Photo showing Baseline Conditions in 2018 – Dentro De Lomas Grading Violation Project

Figure 2d. Aerial Photo showing Existing (2022) Conditions – Dentro De Lomas Grading Violation Project

Figure 3. Forensic Biological Resources on Current (2022) Aerial Photo – Dentro De Lomas Grading Violation Project

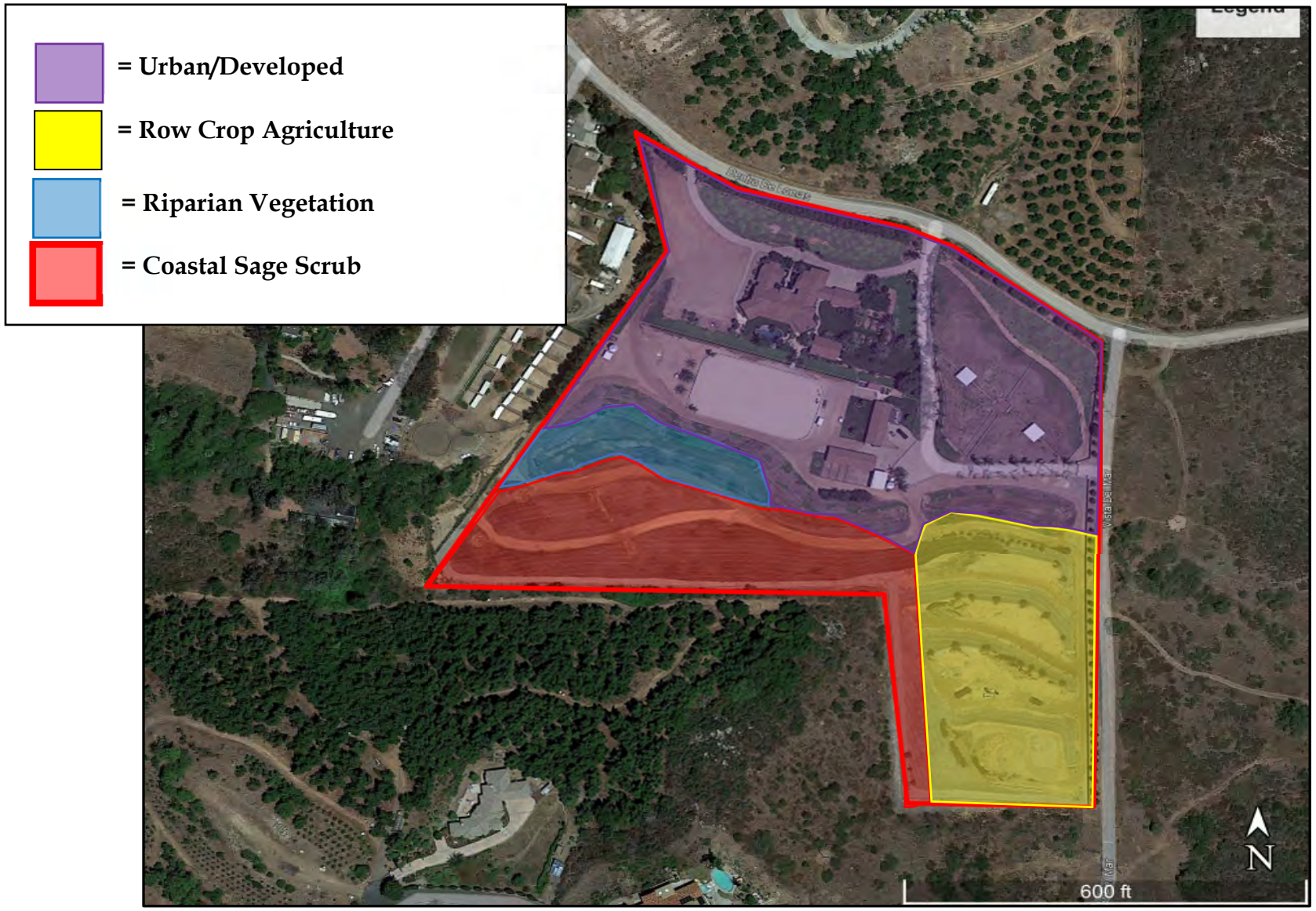

Figure 4. Vegetation on Proposed Remedial Grading Plan – Dentro De Lomas Grading Violation Project

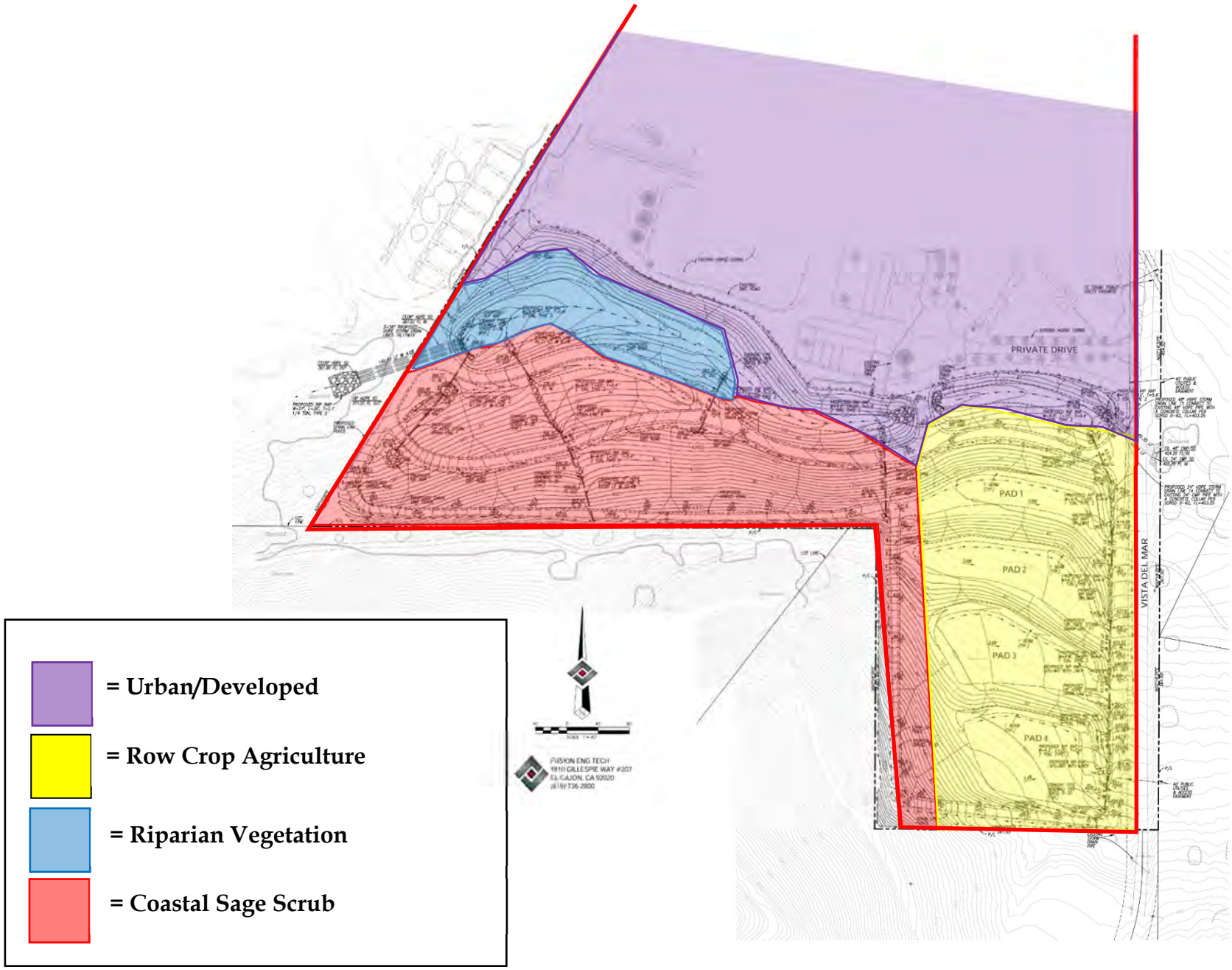
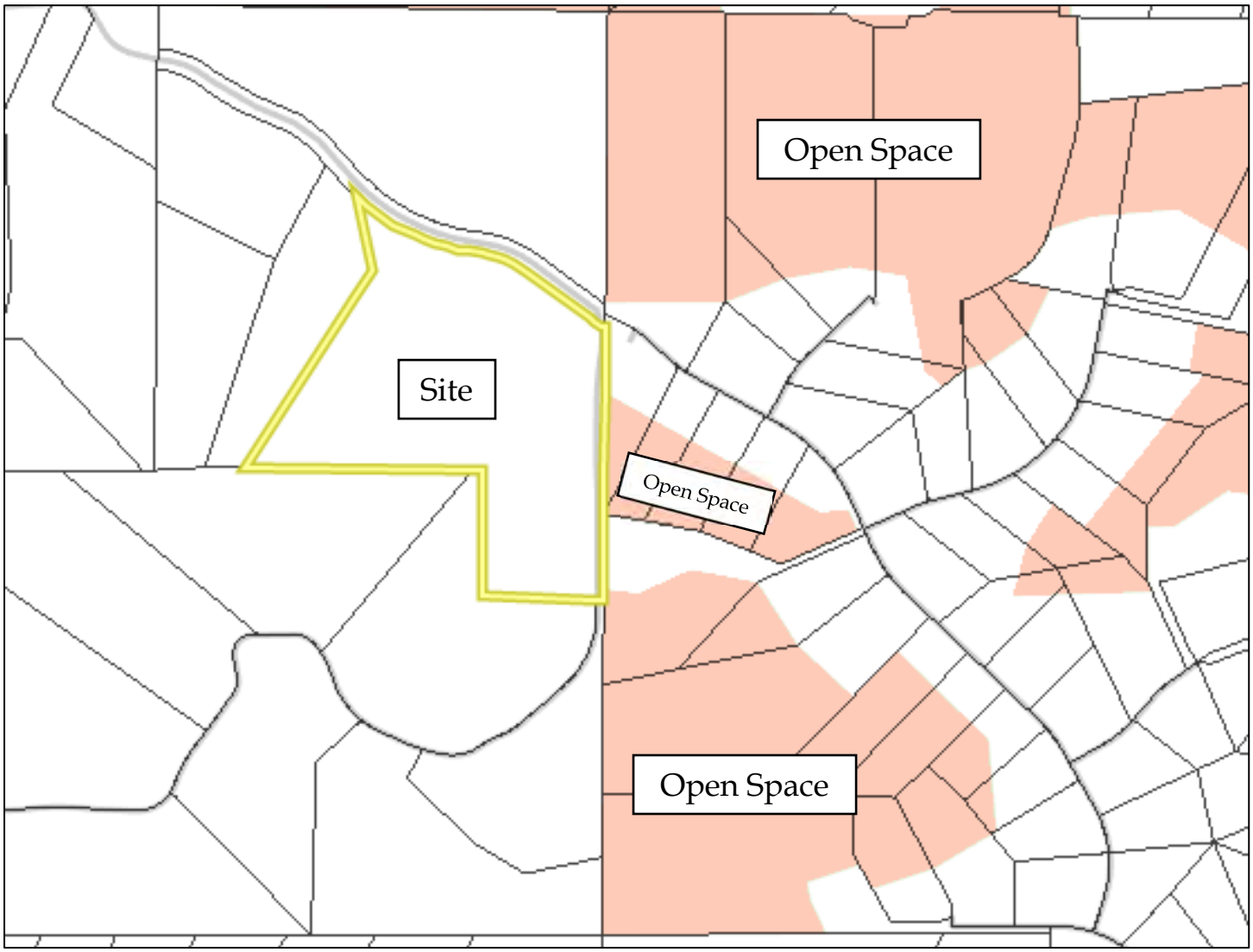
Figure 5. Open Space on Adjoining Properties – Dentro De Lomas Grading Violation Project