



VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CALIFORNIA 92121
(858) 505-6445 General • (858) 694-2705 Codes Compliance
(858) 565-5920 Building Services

TYLER FARMER
ASSISTANT DIRECTOR

July 29, 2025

Scott Sobiech
Attn: Susan Wynn
U.S. Fish and Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA 92008

Ed Pert
Attn: Melanie Burlaza
CA Department of Fish and Wildlife
3883 Ruffin Road
San Diego CA 92123

RE: SAN LUIS REY TRAINING CENTER; PDS2019-LDGRMJ-30228;
CONCURRENCE REQUEST FOR DE MINIMUS EXEMPTION TO HABITAT
LOSS PERMIT PROCESS

The County of San Diego requests concurrence for a *de minimus* exemption to the Habitat Loss Permit process for the above referenced project. If there is no response within 30 days of the date of this request, the County will assume concurrence and the exemption will be considered valid.

The project site is located at 5772 Camino Del Rey Road in the Bonsall Community Planning Area of unincorporated San Diego County (APN 127-460-12-00, 127-460-13-00).

Based on the habitat evaluations, aerial photographs, the preliminary grading plan, biology report, and protocol surveys, County staff recommends that this project qualifies for the *de minimus* exemption as follows:

1. The project proposes removal of less than one acre of coastal sage scrub habitat as shown on the attached Habitat Loss Exhibit.

The project proposes impacts to 0.346 acres of coastal sage scrub habitat.

2. The site is not occupied by the California gnatcatcher.

No coastal California gnatcatchers were observed in the patches of coastal sage scrub habitat during the site visits, which were conducted by an authorized coastal California gnatcatcher section 10(a)(1)(A) permitted biologist.

3. The project occurs in low value habitat or medium value habitat according to the NCCP Habitat Evaluation Model.

The project occurs within very high and high value habitat according to the NCCP Habitat Evaluation Model. However, the land does not link significant blocks of habitat and is an isolated patch of habitat that has been affected by existing development.

4. The habitat loss will not preclude the design or prevent the preparation of the subregional NCCP preserve system because it is outside of any potential preserve planning areas.

While the project site is located within the Pre-Approved Mitigation Area (PAMA) of the County's draft North County Multiple Species Conservation Program (MSCP), the loss of 0.346 acres of coastal sage scrub would not preclude the design or prevent the preparation of the subregional NCCP preserve system. The land does not support or contribute to the long-term survival of sensitive species and is not adjacent or contiguous to preserved habitat.

5. The habitat loss is counted towards the five percent allowance of loss for the County of San Diego. Approved coastal sage scrub losses as of the date of July 29, 2025 and including this approval, for the entire unincorporated County that is not within the Multiple Species Conservation Program are presented in the following table:

Unincorporated Area Coastal Sage Scrub Cumulative Losses

Total loss allowed under five percent guideline:	2953.30 acres
Cumulative loss of Coastal sage scrub to date:	2057.71 acres
Net loss due to this project:	0.346 acres
Total cumulative loss:	2058.06 acres
Remaining loss under five percent guideline:	895.24 acres

Be aware that the County will require, as a condition of the project, mitigation for impacts to coastal sage scrub habitat in accordance with CEQA and the NCCP Conservation Guidelines and Process Guidelines. Additionally, no clearing or grading will be permitted during the breeding season of the California gnatcatcher to the extent feasible along with monitoring by a qualified biologist.

If you have any questions or need additional information, please contact me at Kendalyn.White@sdcounty.ca.gov or (619) 323-4122.

Sincerely,

Kendalyn White, County Biologist
Project Planning Division

Attachments:

USGS Map
Habitat Loss Exhibit

email cc:

Ashley Smith, Chief, Planning & Development Services
Souphalak Sakdarak, Project Manager, Planning & Development Services