



# County of San Diego

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
(858) 505-6445 General • (858) 694-2705 Codes  
(858) 565-5920 Building Services  
[www.SDCPDS.org](http://www.SDCPDS.org)

**DAHVIA LYNCH**  
DIRECTOR

**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)

John Honarvar  
1621 Mountain Pass Circle  
Vista, CA 92081

**Draft**  
**Habitat Loss Permit**

APPLICATION NUMBER: HLP XX-XXX  
ASSOCIATED PERMIT(S): PDS2019-LDGRMJ-30214  
NAME OF APPLICANT: John Honarvar  
DESCRIPTION/LOCATION OF LOSS:

The proposed project is for a Habitat Loss Permit and will remove 6.36 acres of coastal sage scrub associated with the Honarvar Property (PDS2019-LDGRMJ-30214) as shown on the attached Habitat Loss Exhibit dated June 10, 2021.

The proposed project is a Major Grading Permit (MUP) for a single-family residence and associated structures. The proposed project is located in the San Dieguito Community Plan area, within the unincorporated portion of northern San Diego County. The project site east side of Via De Las Flores across the street from The Bridges golf course. The project location is indicated on the attached USGS map.

Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by Everett and Associates (February 20, 2023). The site primarily consists of coastal sage scrub and disturbed habitat. Three sensitive wildlife species, turkey vulture, coastal California gnatcatcher, and southern mule deer, were observed onsite, and two sensitive plant species, San Diego goldenstar and Nuttall’s scrub oak, were observed onsite. Protocol coastal California gnatcatcher surveys were conducted with negative results in May-June 2019. However, a pair was later detected during the subsequent visits to the project site.

The project is proposing to put 0.27 acre of coastal sage scrub habitat into biological open space located on the eastern portion of the parcel. Mitigation credit will also be given for the 1.72 acres SDG&E utility easement located on the property. All other habitats onsite will be impacted. The Diegan coastal sage scrub habitat is considered to be of Intermediate Quality as determined by the criteria established under the Natural Community Conservation Planning (NCCP) Logic Flow Chart. Mitigation ratios and open space are listed in Table 1. Therefore, all impacts associated with the development of the Honarvar property 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	Impact Neutral*	Mitigation Ratio	Total Mitigation Needed	Preserved Onsite	Offsite Mitigation
Coastal sage scrub	8.81	6.36	2.26	3:1	19.08	1.99**	17.09
Disturbed	1.30	1.30	0.00	N/A	N/A	N/A	N/A
Total	10.1	7.66	2.26	--	19.08	1.99	17.09

\* Within existing utility easements.

\*\*Includes 0.27 acres at the eastern end of the project parcel and 1.72 acres of SDG&E utility easement.

**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 PDS2019-LDGRMJ-30214. 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.**

A. Prior to use and reliance on this Habitat Loss Permit, the following conditions shall be met:

1. Obtain approval from the County of San Diego of a Grading Permit, Clearing Permit, or Improvement Plan that authorizes the clearing and/or grading of the area addressed by this Habitat Loss Permit.

***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).

**2. BIO#1–ONSITE BIOLOGICAL EASEMENT [PDS, FEE X 2]**

**INTENT:** In order to protect sensitive biological resources, pursuant to the [Resource Protection Ordinance \(RPO\)](#) and County’s Guidelines for Determining Significance for Biological Resources, a biological open space easement shall be granted. **DESCRIPTION OF REQUIREMENT:** Grant to the County of San Diego an open space easement, as shown on the approved Grading Plan. This easement is for the protection of biological resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. The only exception(s) to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997,

(<http://www.sdcounty.ca.gov/PDS/docs/MemoofUnder.pdf>) between the wildlife agencies and the fire districts and any subsequent amendments thereto. Activities conducted pursuant to a revegetation, habitat management, or landscape plan approved by the Director of PDS, DPW or DPR.

**DOCUMENTATION:** The applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the [DGS, RP], and pay all applicable fees associated with preparation of the documents. **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 easements shall be recorded. **MONITORING:** The [DGS, RP] shall prepare and approve the easement documents and send them to [PDS, PCC] for pre-approval. The [PDS, PCC] shall pre-approve the language and estimated location of the easements before they are released to the applicant for signature and subsequent recordation. Upon Recordation of the easements [DGS, RP] shall forward a copy of the recorded documents to [PDS, PCC] [DPR, TC] for satisfaction of the condition.

**3. BIO#2–HABITAT PRESERVATION [PDS, FEE X2]**

**INTENT:** In order to mitigate for the impacts to vegetation communities, habitats for special-status wildlife species, and occurrences of special-status plant species, suitable mitigation land shall be preserved. **DESCRIPTION OF REQUIREMENT:** The applicant shall provide for the conservation of habitat, in permanent open space, as described below and in accordance with Mitigation Measures #2 and #3 of the Biological Resource Letter Report (Everett and Associates, February 20, 2023). If it is determined that this mitigation is not feasible, the project applicant shall provide for the conservation of habitat generally consistent with the assemblage of vegetation communities impacted by the project and receive concurrence from the Wildlife Agencies and County.

1. Onsite open space shall include 1.99 acres (0.27 acres at the eastern end of the project site and 1.72 acres of SDG&E utility easement on the project site). See condition Bio#1.
2. Offsite open space shall include 26.65 acres of existing open space (APN 264-660-06-00) located adjacent to the project site and donated by Martin Boone and SBF Financial LLC to Endangered Habitat Conservation (EHC).
3. The project applicant will provide \$598,150 to EHC for the management of the entire 28.64 acres of onsite and offsite open space. Funds will be held by the San Diego Foundation, or similar entity, to be distributed solely for the purpose of management.
4. Impacts to 50 San Diego Goldenstar individuals will be mitigated by protecting a significant population (over 5,000 individuals) of the plants on the 303-acre Endangered Habitats Conservancy Crestlake property adjacent to Crestridge Ecological Reserve east of El Cajon. The project will fund a five-year effort to control and eradicate the South African long-flowered veldtgrass, a highly invasive non-native weed species that is threatening the goldenstar population on the property. The Endangered

Habitats Conservancy will receive a flat one-time payment of \$30,000 as a direct payment for this work.

**DOCUMENTATION:** The applicant shall provide the evidence of completion of the mitigation to the [PDS, PCC] for review and approval. **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 evidence for compliance with this condition.

**OCCUPANCY:** (Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).

**4. BIO#3–OPEN SPACE SIGNAGE [PDS, FEE]**

**INTENT:** In order to protect the proposed open space easement from entry, informational signs shall be installed. **DESCRIPTION OF REQUIREMENT:** Open space signs shall be placed along the biological open space boundary as indicated on the approved Grading Plan. The signs must be corrosion resistant, a minimum of 6" x 9" in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

**Sensitive Environmental Resources  
Area Restricted by Easement**

Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego,  
Planning & Development Services  
Reference: PDS2019-LDGRMJ-30214

**DOCUMENTATION:** The applicant shall install the signs as indicated above and provide site photos and a statement from a California Registered Engineer, or licensed surveyor, that the open space signs have been installed at the boundary of the open space easement. **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 open space signs shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

- B. Prior to use and reliance on this permit the following conditions shall be placed on the face of all future grading permits or improvement plans:

**PRE-CONSTRUCTION MEETING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances. Happens after the grading permit has been issued and the applicant is ready for ground disturbing activity. Pre-con is a meeting in which the PDCI Inspector meets with the EOW, contractors, monitors, PDS Staff, consultants, and the owner to discuss responsibilities and expectations.

**1. BIO#4–TEMPORARY ORANGE FENCING [PDS, FEE]**

**INTENT:** In order to prevent inadvertent disturbance to areas outside the limits of grading, temporary construction fencing shall be installed. **DESCRIPTION OF REQUIREMENT:** Prior to the commencement of any grading and/or clearing in association with this grading plan, temporary orange construction fencing shall be placed to protect from inadvertent disturbance of all open space easements that do not allow grading, brushing, or clearing. Temporary fencing is also required in

all locations of the project where proposed grading or clearing is within 100 feet of an open space easement boundary. The placement of such fencing shall be approved by the PDS, Permit Compliance Section. Upon approval, the fencing shall remain in place until the conclusion of grading activities after which the fencing shall be removed. **DOCUMENTATION:** The applicant shall provide evidence that the fencing has been installed and have a California licensed surveyor certify that the fencing is located on the boundary of the open space easement. The applicant shall submit photos of the fencing along with the certification letter to the [PDS, PCC] for approval. **TIMING:** Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances the fencing shall be installed, and shall remain for the duration of the grading and clearing. **MONITORING:** The [PDS, PCC] shall either attend the preconstruction conference and approve the installation of the temporary fencing, or review the certification and pictures provided by the applicant.

2. **BIO#5-RESOURCE AVOIDANCE [PDS, FEE X2]**

**INTENT:** In order to avoid impacts to migratory birds and raptors, which are a sensitive biological resource pursuant to the Migratory Bird Treaty Act (MBTA), a Resource Avoidance Area (RAA), shall be implemented on all plans. **DESCRIPTION OF REQUIREMENT:** There shall be no brushing, clearing and/or grading such that none will be allowed within 300 feet of migratory bird nesting habitat and 500 feet of raptor nesting habitat during the breeding season of the migratory bird and raptor within RAA as indicated on these plans. The breeding season is defined as occurring between February 1 and August 31. The Director of PDS [PDS, PCC] may waive this condition, through written concurrence from the US Fish and Wildlife Service and the California Department of Fish and Wildlife, provided that no migratory birds or raptors are present in the vicinity of the brushing, clearing, or grading as demonstrated by a survey completed no more than 72-hours prior to the start of brushing, clearing, or grading. **DOCUMENTATION:** The applicant shall provide a letter of agreement with this condition; alternatively, the applicant may submit a written request for waiver of this condition. Although, no grading shall occur within the RAA until concurrence is received from the County and the Wildlife Agencies. **TIMING:** Prior to preconstruction conference and prior to any clearing, grubbing, trenching, grading, or any land disturbances and throughout the duration of the grading and construction, compliance with this condition is mandatory unless the requirement is waived by the County upon receipt of concurrence from the Wildlife Agencies. **MONITORING:** The [DPW, PDCI] shall not allow any grading in the RAA during the specified dates, unless a concurrence from the [PDS, PCC] is received. The [PDS, PCC] shall review the concurrence letter.

**FINAL GRADING RELEASE:** *Prior to any occupancy, final grading release, or use of the premises in reliance of this permit. Final release coincides with the Occupancy milestone of the Discretionary Permit conditioning.*

3. **BIO#6-PERMANENT OPEN SPACE SIGNAGE [PDS, FEE]**

**INTENT:** In order to protect the proposed open space easement from entry, the permanent signage shall be installed. **DESCRIPTION OF REQUIREMENT:** The permanent open space signs shall be placed along the open space boundary as

shown on the approved grading plans and the approved project development Plans for PDS2019-LDGRMJ-30214.

- a. Evidence shall be site photos and a statement from a California Registered Engineer, or licensed surveyor that the permanent open space signs have been installed.
- b. The signs must be corrosion resistant, a minimum of 6" x 9" in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

**Sensitive Environmental Resources  
Area Restricted by Easement**

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Planning & Development Services  
Reference: PDS2019-LDGRMJ-30214

**DOCUMENTATION:** The applicant shall install the permanent fencing and signage and provide the documentation photos and certification statement to the [PDS, PCC]. **TIMING:** Prior to the occupancy of any structure, final grading release or use of the premises in reliance of this permit, fencing and signage shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

4. **BIO#7-EASEMENT AVOIDANCE [PDS, FEE]**

**INTENT:** In order to protect sensitive resources, pursuant to [County Grading Ordinance Section 87.112](#) the open space easements shall be avoided.

**DESCRIPTION OF REQUIREMENT:** The easement indicated on this plan is for the protection of sensitive environmental resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. It is unlawful to grade or clear within an open space easement, any disturbance shall constitute a violation of the [County Grading Ordinance Section 87.112](#) and will result in enforcement action and restoration. The only exception(s) to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997, (<http://www.sdcounty.ca.gov/PDS/docs/MemoofUnder.pdf>) between the wildlife agencies and the fire districts and any subsequent amendments thereto. Activities conducted pursuant to a revegetation, habitat management, or landscape plan approved by the Director of PDS, DPW or DPR.

**DOCUMENTATION:** The applicant shall provide a letter statement to the [PDS, PCC] stating that all Sensitive Resource Easements were avoided during the grading construction, and that no impacts or encroachment into the open space occurred. **TIMING:** Prior to Final Grading Release the letter verifying the easements were not disturbed shall be submitted. **MONITORING:** The [DPW, PDCI] shall not allow any grading, clearing or encroachment into the open space easement.

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 6.36 acres of coastal sage scrub and 1 pair of California gnatcatcher (*Polioptia californica*). Approved coastal sage scrub losses as of the date of October 18, 2022 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:

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:	1421.30 acres
Net loss due to this project:	6.36 acres
Total cumulative loss:	1427.66 acres
Remaining loss under five percent guideline:	1525.64 acres

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

The 8.81 acres of coastal sage scrub onsite is of intermediate value as outlined by the flow chart in the NCCP Guidelines. The CSS habitat on the eastern side of the site is shown as very high value on the County habitat evaluation map and the remainder of the site is shown as developed on the County habitat evaluation map. Existing development is located to the north, west, and south of the project site. The project would directly impact 6.36 acres of CSS onsite. The project has been designed to develop within the central and western portion of the site and preserve the habitat on the eastern portion of the site, which is located adjacent to an existing preserve and also shown as very high



habitat value. Therefore, the habitat loss will not 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 CSS habitat on the eastern portion of the site is shown as very high value on the County habitat evaluation map and the remainder of the site is shown as developed on the County habitat evaluation map. The western portion of the site is mapped as outside the Pre-Approved Mitigation Area (PAMA), while the remainder of the site is mapped as PAMA. There is existing development located to the north, west, and south of the project site. The project has been designed to develop within the central and western portion of the site, adjacent to the existing development, and preserve the habitat on the eastern portion of the site, which is located adjacent to an existing preserve and also shown as very high habitat value. While there will be impacts to areas mapped as PAMA, 1.99 acres of PAMA onsite will be preserved. This preserved area is located adjacent to existing preserve areas, which will provide an increased wildlife corridor. The onsite and adjacent open space will be managed by the Endangered Habitats Conservancy (EHC) and management will be funded by the project applicant. Therefore, 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. The very high value CSS on the eastern portion of the site is being preserved within a biological open space easement, which was determined to be viable due to its connection with offsite preserved habitat. The onsite and adjacent open space will be managed by the EHC and management will be funded by the project applicant. The area of the site to be developed is shown as developed on the County habitat evaluation map and is surrounded by development on the north, west, and south. Therefore, impacts have been designed within the least sensitive portions of the site. Permanent signage will prevent indirect impacts to the onsite preserved habitats. 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.

Three sensitive wildlife species, turkey vulture, coastal California gnatcatcher, and southern mule deer, were observed onsite, and two sensitive plant species, San Diego goldenstar and Nuttall’s scrub oak, were observed onsite. Habitat loss and impacts to special status wildlife species will be mitigated through on and offsite preservation. The onsite preservation includes 0.27 acres of CSS located on the eastern portion of the site and 1.72 acres located within an existing SDG&E utility easement on the property. The offsite preservation includes 26.65 acres located adjacent to the project site and donated by Martin Boone and SBF Financial LLC to EHC. The 28.64 acres of onsite and offsite mitigation will be funded by the project applicant and managed by the EHC. Breeding season avoidance will be implemented to avoid impacts to avian species protected under

the Migratory Bird Treaty Act (MBTA). Impacts to sensitive plant species will occur through the preservation of San Diego goldenstar individuals offsite and the translocation of the 1 individual Nuttall's scrub oak to the open space area. Through these mitigation measures, the habitat loss will not appreciably reduce the likelihood of 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. Issuance of, and concurrence with, a Habitat Loss Permit is also required to authorize further clearing of any coastal sage scrub supported on the project site. 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 Honarvar 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:

A.1, A.2, A.3, A.4, B.1, B.2, B.3, B.4

**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 \$2,548.00 (2022 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 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

DL:AS:kw

Attachments

Habitat Loss Exhibit dated June 10, 2021

USGS Map

Biological Resource Letter Report (Everett and Associates; February 20, 2023)

cc: To be provided at issuance of Habitat Loss Permit

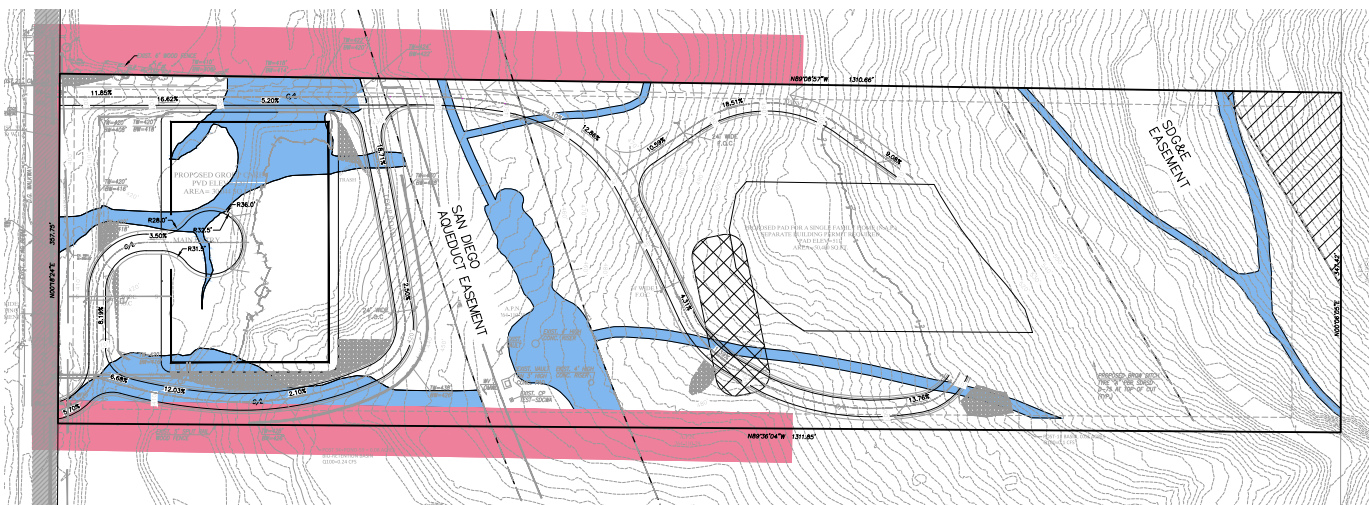
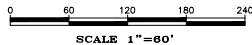
DRAFT

FORENSIC BIOLOGICAL RESOURCES MAP

RANCHO SERENA PROJECT  
PDS2019-MPA-19-001

LEGEND

- DISTURBED HABITAT  
HOLLAND CODE 11300
- DIEGAN COASTAL SAGE SCRUB  
HOLLAND CODE 35200
- URBAN / DEVELOPED  
HOLLAND CODE 12000
- PROPOSED BIOLOGICAL  
OPEN SPACE
- LOCATION OF SAN  
DIEGO GOLDENSTAR  
BLOOMERIA CLEVELANDII



**BASE MAP PREPARED BY:**  
ALI SHAPOURI, AICP, CEO  
SHAPOURI & ASSOCIATES  
10829 CALLE AMBIENTE, SUITE 501  
RANCHO SANTA FE, CA 92067

**BIOLOGICAL RESOURCES MAP PREPARED BY:**

*William T. Everett* 6/10/2021

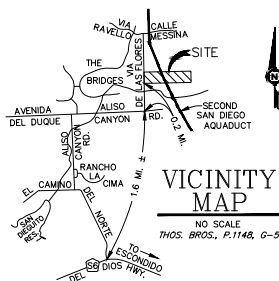
WILLIAM T. EVERETT  
EVERETT AND ASSOCIATES  
ENVIRONMENTAL CONSULTANTS  
POST OFFICE BOX 1085  
LA JOLLA, CALIFORNIA 92038  
858 456-2990

**NOTE:**  
VEGETATION COMMUNITY MAPPING IS PREPARED USING OVERLAYS OF CURRENT AERIAL PHOTOGRAPHS AND IS VERIFIED ON THE GROUND TO THE GREATEST DEGREE POSSIBLE IN THE ABSENCE OF A SYSTEMATIC LAND SURVEY. ALL VEGETATION AREAS, BOUNDARIES, AND FUEL MODIFICATION ZONE LIMITS ARE ESTIMATES SUBJECT TO FINAL DETERMINATION BY A LICENSED PROFESSIONAL LAND SURVEYOR.

**EXISTING, IMPACTED, AND PRESERVED HABITAT ON THE PROJECT SITE**

VEGETATION COMMUNITY	ACREAGE ON-SITE*	IMPACTED ACREAGE	IMPACT NEUTRAL**	TOTAL MITIGATION REQUIRED (Ratio)	PRESERVED OFF-SITE	OFF-SITE MITIGATION (Ratio)
Diegan Coastal Sage Scrub	8.81	6.36	2.26	19.08 (3:1)	1.99	17.09 (3:1)
Disturbed Habitat	1.30	N/A	N/A	0	N/A	N/A
<b>Total</b>	<b>10.1</b>	<b>6.36</b>	<b>2.26</b>	<b>19.08</b>	<b>1.99</b>	<b>17.09</b>

\* Prior to previous unpermitted grading conducted on the site.  
\*\* Worth existing utility easements.



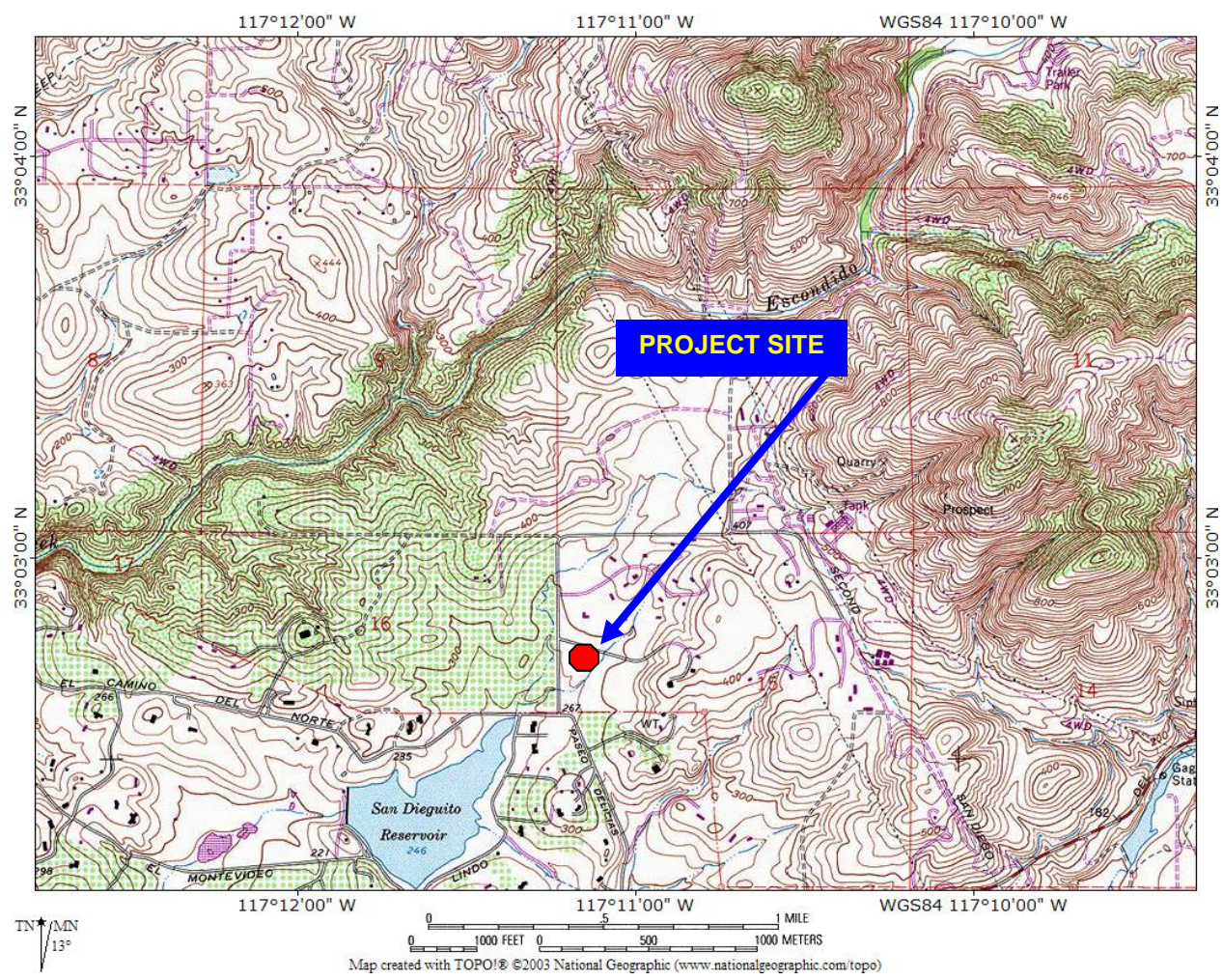


Figure 3. Topographical map showing project site. Taken from USGS Rancho Santa Fe 7.5 minute series quadrangle.

# EVERETT AND ASSOCIATES

## ENVIRONMENTAL CONSULTANTS

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### **FORENSIC BIOLOGICAL RESOURCES LETTER REPORT**

**Project Name: Rancho Serena Project, Rancho Santa Fe, PDS2019-MPA-19-001**

Dear Ali,

I have prepared this Biological Resources Report at your request and in response to correspondence with County staff and several meetings with representatives of the Wildlife Agencies.

The Rancho Serena project (see Figures and accompanying Biological Resources Map) is the application for an after-the-fact permit to resolve a prior grading violation, an application for a Tentative Parcel Map to create two legal parcels, and application for a Major Use Permit to allow for a Senior Care Facility. The site is bisected by the 130 foot wide Second San Diego Aqueduct easement and a 200 foot wide SDG&E High Power Line easement. The parcel (APN 264-110-30) contains 10.1 acres. I previously prepared a Forensic Biological Resources Report (dated 27 February 2015) for the now-abandoned Virissimo Project PDS2014-LDGRMJ-00017. This report provides an update based on more recent field investigations and the new proposed project design.

### **PROJECT LOCATION AND SETTING**

The project site is located on the east side of Via De Las Flores across the street from The Bridges golf course (Figures 1 and 2). The approximate USGS coordinates of the site are 33°03'N, 117°11'W as determined on-site by Global Positioning System (GPS) receiver (Rancho Santa Fe 7.5 minute series quadrangle, see Figure 3). The elevation of the site ranges from 280 to 650 feet, with topography consisting of a west-facing gentle slope increasing to the east on the site. The property is bounded on the west by the golf course, on the north and south by rural residential development, and on the east by undeveloped land (Figures 4 and 5). The project site is located within the County's draft North County Multiple Species Conservation Program (MSCP), with the eastern portion in land designated as Pre-Approved Mitigation Area (PAMA) and the western portion in land designated as Outside the PAMA.

## METHODS AND LIMITATIONS

To conduct an assessment of biological resources for the project as currently designed, I visited the project site on 15 May 2019. The conditions for observation during the visit were excellent, with 100% cloud cover, no impediments to visibility, temperatures in the low 60s, and no wind. The visit lasted from approximately 1200 to 1715. During my visit, I was able to examine the entire project site and adjacent areas. My observations were recorded as they were made and form the basis of this report and the site Biological Resources Map. Animals were identified using scat, tracks, burrows, vocalizations, or by direct observation with the aid of 10X42 Leica binoculars.

In addition, directed surveys for sensitive plant species were conducted on 22 April and 3 June 2019. These surveys were conducted by slowly walking parallel transects five to ten meters apart, depending on the density of the vegetation.

Due to the time period the site was visited within it was unlikely that any crepuscular or nocturnal wildlife species would have been observed. Also, due to the time of year of the site visits were made wildlife migratory bird species that typically winter in the region would not have been observed.

Vegetation mapping was conducted in accordance with vegetation community definitions as described in Oberbauer, et al. (2008). In addition, vegetation mapping on-site was aided by the use of a digital color satellite photograph. It should be noted that all vegetation community mapping is verified on the ground to the greatest degree possible in the absence of a systematic land survey. All vegetation areas and boundaries are best estimates subject to final delineation by a licensed professional land surveyor. Forensic mapping of the historical extent and disturbance of natural vegetation was aided by examination of historic aerial imagery back to 1983.

### Sensitive Species and Habitats

Prior to the site visit, a variety of sources were reviewed to ascertain the possible occurrence of sensitive species at the project site. First, soil types (Bowman 1973) were checked to determine if the site contains soils known to support sensitive plant species. Records searches for the USGS quadrangle and surrounding quads were done of the California Natural Diversity Data Base (CNDDB) and California Native Plant Society (CNPS) On-Line Inventory of Rare and Endangered Plants. Any sensitive species known to occur in the vicinity were given special attention, and available natural history information is reviewed. Seasonal occurrence patterns (*e.g.*, annual plants, migratory birds) were factored into survey plans in the event that site visits were made during time periods when certain species are not present or conspicuous. Information sources include the Jepson Manual (2012), Rare Plants of San Diego (Reiser 1994), A Flora of San Diego County, California (Beauchamp 1986), San Diego Native Plants (Lightner 2011), U.S. Fish and Wildlife Service Recovery Plans for Threatened/Endangered Species, the San Diego County Bird Atlas (Unitt 2004), and numerous other references, publications, and on-line resources.



A list of sensitive species with potential to occur on the site was also reviewed prior to field work (See Appendix D). All species on the list were reviewed, and those species requiring directed or focused protocol surveys were noted and given appropriate attention. In the field, potentially sensitive plant species not readily identified *in situ* were photographed and/or collected for identification via keys or other methods.

During site visits, all habitats were assessed for their suitability for occupation by any sensitive species with potential to occur.

## RESULTS<sup>1</sup>

### Soils

Based on soil conservation service maps (Bowman 1973), the soil type for the project site is Huerhuero loam, 2-9% slopes (HrC). Although a detailed soil analysis is beyond the scope of this report, on-site examination appeared to verify this principal soil type.

### Habitats / Vegetation Communities (See Biological Resources Map)

#### Diegan Coastal Sage Scrub (Holland Code 32520 - 8.81 acres)

This habitat type currently occupies that portion of the project site east of the aqueduct easement. The area contains typical CSS species, including California sagebrush *Artemisia californica*, California buckwheat *Eriogonum fasciculatum* ssp. *fasciculatum*, laurel sumac *Malosma laurina* and other common CSS plant species. This vegetation community type is considered County Resource Protection Ordinance Sensitive Habitat Land as well as being considered a sensitive habitat type by the state and federal Wildlife Agencies.

#### Disturbed Habitat (Holland Code 11300 - 1.30 acres)

Based on historic aerial and satellite imagery, sometime in early 2008 the area west of the aqueduct easement was cleared and graded, creating two level construction pads. Analysis of images prior to 1993 shows a cleared area, likely used for storage, along the north property line where the pads are now located (Figure 6). Also shown is a small area in the southwest corner of the site that was kept free of vegetation. It is also evident that much of the pad areas were cleared of vegetation as far back as the early 1980s, well before the pads were created. Disturbed Habitat is not considered a sensitive habitat type by the County or state and federal Wildlife Agencies.

The current condition of the pad area is disturbed, with mostly bare ground and scattered invasive weedy grasses and forbs, including species from the genera *Avena*, *Brassica*, *Bromus*, *Erodium*, and *Hordeum*.

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<sup>1</sup> Scientific and common names for plant species are derived from The Jepson Manual, 2012; scientific and common names for birds from the A.O.U. Check-list of North American Birds, 1998, and Supplements to date; scientific and common names for mammals from the San Diego County Mammal Atlas, 2017.

Based on forensic analysis, the graded pad areas, with the exception of the two small areas mentioned above, were likely Coastal Sage Scrub (See Biological Resources Map).

## Wildlife

During the site surveys eight common resident and migratory bird species were observed. The only mammal recorded from the site was Botta's Pocket Gopher *Thomomys bottae*. The only reptile or amphibian recorded was Western Fence Lizard *Sceloporus occidentalis*. Additional common animal species likely occur on-site. A complete list of wildlife species detected is provided in Appendix B.

## Special Status Species

Focused surveys, directed surveys, and habitat assessments for sensitive species with potential to occur were conducted. During the current site assessment three species considered sensitive were observed:

The **California Gnatcatcher** *Poliioptila californica* is known to occur in the vicinity (Subarea HCP) so special attention to this species is warranted. The California Gnatcatcher is a federal threatened species, a state species of concern, and is a "target species" of the NCCP process. This species is a non-migratory resident whose range covers the coastal plains and foothills of Southern California and northern Baja California. In San Diego County, it is widespread in coastal lowlands below about 2,000 feet elevation and typically occurs in or near CSS. The California Gnatcatcher is seriously declining due to loss of habitat. Between 85% and 90% of this species' habitat has been lost to urban or agricultural development. It is almost extirpated from Ventura, San Bernadino, and Los Angeles counties. The population is estimated to be just under 5000 pairs. San Diego County appears to be the center of abundance within the United States for this species.

Although no gnatcatchers were detected during protocol surveys of the project site (See Appendix E), a pair were later detected during several subsequent visits to the project site. The California Gnatcatcher is a Group 1 Species on the County of San Diego Sensitive Animal List.

**San Diego Goldenstars** *Bloomeria clevelandii* were observed during the first spring 2019 survey for sensitive plants. Approximately 50 individuals were observed in the CSS area between the Water Authority and SDG&E easements (See Biological Resources Map). A subsequent survey was conducted on 22 April 2020 and only four individuals were observed at that time. Although not listed as threatened or endangered by state or federal agencies, the San Diego Goldenstar is included in List A on the County's Sensitive Plant List Designation. Project implementation (as currently designed) will result in the loss of all the individual plants on the project site.

A single **Nuttall's Scrub Oak** *Quercus dumosa* was observed on the project site east of the aqueduct easement. This species is on the County's List A of sensitive plant species. The project will impact this individual plant.

Two additional species considered sensitive by the County of San Diego were detected during site surveys in 2014. These are:

**Turkey Vultures** *Cathartes aura* forage for carrion over a variety of habitats. They are common migrants and winter residents in San Diego County and were formerly a more common breeding species. Turkey Vultures occur throughout the Americas, with an estimated population of 4,500,000 individuals occupying at least 11,000,000 square miles. The project site may be occasionally used as foraging habitat for this species. Turkey Vultures do not build nests as they prefer crevices in cliff faces or very steep densely vegetated slopes where they nest on the ground. Turkey vultures are only highly sensitive to disturbance at their nests. No suitable nesting habitat occurs on, near, or in the general vicinity of the project site. This species was observed flying overhead during the previous (2014) biological site reconnaissance. Because of the small size of the project site, the highly mobile nature of this species and the large nearby areas undisturbed foraging habitat, no significant impacts to this species are anticipated. The Turkey Vulture is a Group 1 Species on the County of San Diego Sensitive Animal List.

**Southern Mule Deer** *Odocoileus hemionus* are common residents of a variety of Montane and cismontaine habitats in San Diego County and are legally hunted on both public and private lands. They are highly adaptable and even occur along the coast at Torrey Pines State Preserve. Small populations isolated by development may eventually disappear, which is apparently the reason it is considered a sensitive species. The project site bounded on the east extensive areas of preserved habitat. Given this, it is unlikely that the species will be negatively impacted by the proposed project. The Southern Mule Deer is a Group 2 Species on the County of San Diego Sensitive Animal List

No other sensitive species are considered likely to occur on the project site.

**Large mammals**, such as Mule Deer and Mountain Lion *Felis concolor* typically prefer large unfragmented natural areas that offer extensive adequate forage or hunting opportunities as well as the opportunity for movement across long distances. Deer scat and a shed antler were found in the CSS east of the aqueduct easement.

Because the area to be impacted is situated within an essentially developed area, opportunities for large mammal use are very limited. As shown in Figures 4 and 5, the site is surrounded on three sides by extensive, long-established development. The golf course to the west of the site is protected by an eight foot high chain link fence which precludes wildlife from entering or traversing. Opportunities for large mammal use and movement occur nearby in Escondido Creek and the San Dieguito River. Also, east of the project site is a large undisturbed area more suitable for movement by large mammal species that functions as a north/south regional wildlife corridor.

Due to the high density of the CSS on the project site it is unlikely that **raptor species** would forage within the property and there is no suitable raptor nesting habitat available on the site. The site would provide foraging opportunities for other resident and **migratory bird species** and potentially be used as nesting habitat for these species.

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

A wildlife corridor can be defined as a linear landscape feature allowing animal movement between two larger patches of habitat. Connections between extensive areas of open space are integral to maintain regional biodiversity and population viability. In the absence of corridors, habitats become isolated islands surrounded by development. Fragmented habitats support significantly lower numbers of species and increase the likelihood of local extinction for select species when they are restricted to small isolated areas of habitat. Areas that serve as wildlife movement corridors are considered biologically sensitive.

Wildlife corridors can be defined in two categories: regional wildlife corridors and local corridors. Regional corridors link large sections of undeveloped land and serve to maintain genetic diversity among wide-ranging populations. Local corridors permit movement between smaller patches of habitat. These linkages effectively allow a series of small, connected patches to function as a larger block of habitat and perhaps result in the occurrence of higher species diversity or numbers of individuals than would otherwise occur in isolation. Target species for wildlife corridor assessment typically include species such as bobcat, mountain lion, and mule deer.

To assess the function and value of a particular site as a wildlife corridor, it is necessary to determine what areas of larger habitats it connects, and to examine the quality of the corridor as it passes through a variety of settings. High quality corridors connect extensive areas of native habitat and are not degraded to the point where free movement of wildlife is significantly constrained. Typically, high quality corridors consist of an unbroken stretch of undisturbed native habitat.

Most of the area to be developed is surrounded on three sides by long-established residential development (See Figures 4 and 5). The golf course to the west of the site is protected by an eight foot high chain link fence which precludes wildlife from entering. To the east of the project site is a significant regional wildlife corridor, which will be expanded, preserved, and managed in perpetuity as partial mitigation for project impacts.

## **Native Wildlife Nursery Sites**

Native Wildlife Nursery Sites, which are considered sensitive resources that require protection, are defined in the County of San Diego Guidelines for Determining Significance - Biological Resources as “sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies”. Features such as individual raptor or woodrat nests do constitute places where wildlife *concentrate*, thus they do not meet this definition and are therefore not considered Native Wildlife Nursery Sites. No Native Wildlife Nursery Sites occur on or near the project site, and none will be impacted by project implementation.

## **Jurisdictional Wetlands/Waters**

No jurisdictional wetlands and/or waters occur on or near the project site.

## **PROJECT DRAFT MSCP COMPATIBILITY**

The conversion of natural habitats in the unincorporated County of San Diego is currently regulated through Subarea Planning efforts in compliance with the California Natural Community Conservation Program (NCCP) process, and in accordance with County Guidelines based on the California Environmental Quality Act (CEQA) and various County policies. The parcel is not within the approved South County Multiple Species Conservation Program (MSCP) but is contiguous on the east with the Plan. Within the draft North County MSCP Subarea the portion of the project site east of the aqueduct easement is designated as a proposed Pre-Approved Mitigation Area (PAMA). The western portion of the property is not located within a proposed PAMA.

## **PROJECT IMPACTS**

CEQA requires that projects avoid or adequately mitigate for the loss of sensitive species and habitats. Such avoidance or mitigation enables County staff to make a finding that all project impacts are below or will be reduced to a level below significant and to issue a Negative Declaration or Mitigated Negative Declaration for the proposed project.

### **Indirect Impacts**

There is the potential for indirect impacts to occur as a result of implementation of the proposed project. The areas where indirect impacts have the potential to occur could extend from the development areas into sensitive habitat due to such activities as excessive landscape irrigation, vegetation trampling outside developed areas, and introduction of non-native species (*e.g.*, Argentine ants, cats, non-native invasive plant species). These indirect impacts are referred to as “edge effects.” There is the potential for indirect impacts on animals as a result of an increase in noise, dust, and light during permitted activities and from vehicle use. These indirect impacts are considered unavoidable due to the nature of the project and existing surrounding land uses.

Indirect impacts from edge effects are considered adverse, but not significant, because BMPs and other conditions imposed on the project mitigate indirect impacts, and existing edge effects and disturbance are already impacting the site. Additional effects, if any, would be incremental and less than significant.

### **Direct Impacts**

Direct impacts occur when biological resources are altered or destroyed during the course of, or as a result of, project implementation. Examples of such impacts include removal or grading of vegetation, filling wetland habitats, or severing or physically restricting the width of wildlife corridors. Other direct impacts may include loss of foraging or nesting habitat and loss of individual species as a result of habitat clearing. Indirect impacts may include elevated levels of noise or lighting, change in surface water hydrology within a floodplain, and increased erosion or sedimentation. These types of indirect impacts can affect vegetation communities or their potential use by sensitive species. Permanent impacts may result in irreversible damage to

biological resources. Temporary impacts are interim changes in the local environment due to construction and would not extend beyond project-associated construction, including revegetation of temporarily disturbed areas adjacent to native habitats.

The CEQA Guidelines define “significant effect on the environment” as a “substantial, or potentially substantial adverse change in the environment.” The CEQA Guidelines further indicate that there may be a significant effect on biological resources if the project will:

- A. Substantially affect an endangered, rare or threatened species of animal or plant or the habitat of the species.
- B. Interfere substantially with the movement of any resident or migratory fish or wildlife species to the extent that it adversely affects the population dynamics of the species.
- C. Substantially diminish habitat for fish, wildlife, or plants.

The clearing and grading resulting from project implementation result in the removal of ~50 San Diego Goldenstar plants and a single Nuttall’s Scrub Oak plant. In addition to impacts to the San Diego Goldenstar and Nuttall’s Scrub Oak, the project as proposed will impact a sensitive vegetation community (CSS) and removal habitat likely used by the California Gnatcatcher. A tabulation of project impacts is presented in Table 1. Forensic calculations were based on 2006 and earlier color satellite and aerial images.

**Table 1. Existing, impacted, and preserved habitat on the project site.**

VEGETATION COMMUNITY	ACREAGE ON-SITE*	IMPACTED ACREAGE	IMPACT NEUTRAL**	TOTAL MITIGATION REQUIRED (Ratio)	PRESERVED ON-SITE	OFF-SITE MITIGATION (Ratio)
Diegan Coastal Sage Scrub	8.81	6.36	2.26	19.08 (3:1)	1.99	17.09 (3:1)
Disturbed Habitat	1.30	N / A	N / A	0	N / A	N / A
Total	10.1	6.36	2.26	19.08	1.99	17.09

\* Prior to previous unpermitted grading conducted on the site.

\*\* Within existing utility easements.

No off-site impacts will result from implementation of the project as proposed.

### Cumulative Impacts

Cumulative impacts consider the potential regional effects of a project and how a project may affect an ecosystem or one of its sensitive components beyond the project limits and on a regional scale. Section 15064 of the State CEQA Guidelines governs the determination of significant environmental impacts caused by a project. The evaluation of a project’s cumulative impacts is discussed in Section 15064(h) of the CEQA Guidelines. Cumulative impacts must be

discussed when project impacts, although individually limited, may be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant 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 resource (CEQA Guidelines §15064(h)(1)).

A lead agency may determine in an initial study that “a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant”. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than “cumulatively considerable” (CEQA Guidelines §15064(h)(2)). The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable (CEQA Guidelines §15064 (h)(4)).

To assess potential cumulative impacts for this project, several factors were considered. First, the project site is surrounded on three sides existing development. Areas to be impacted outside of the proposed Pre-Approved Mitigation Area (PAMA), suggest that in the regional context, they would not be slated for long-term preservation. Thus, take of sensitive upland habitat in the area (and required mitigation) is likely to be supported as a means of funding and acquiring important tracts of habitat that will ultimately lead to assembly of a regional preserve system consisting of core habitat areas and the linkages that connect them, including habitat that can support candidate, sensitive, or special status species, at least three of which are currently found on the project site.

In the absence of adequate mitigation, the Rancho Serena project would have the potential to significantly degrade the quality of the environment. Other effects that would be considered cumulatively considerable would include substantial reduction the habitat of a fish or wildlife species that cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or significantly reduce the number or restrict the range of a rare or endangered plant or animal species. None of these other effects apply to the Rancho Serena project.

This project would result in losses of Coastal Sage Scrub. However, this is not considered cumulatively significant, because mitigation for these impacts will contribute to the preservation of biologically viable habitat that can support candidate, sensitive, or special status species.

As currently designed, the project could result in cumulatively considerable impacts (in the absence of adequate mitigation). However, because all project impacts will be mitigated to a level that is “less than significant”, the Rancho Serena project will not result in impacts that are cumulatively considerable.

## MITIGATION AND RECOMMENDATIONS

Impacts to 6.36 acres of CSS is considered significant and will require mitigation to reduce impacts to a level below significant and will require issuance of a Habitat Loss Permit (HLP). The eastern portion of the project site is located within a draft Pre-Approved Mitigation Area (PAMA) within the Draft North County MSCP Sub-area Plan and qualifies as a Biological Resources Core Area (BRCA). The Southern California Coastal Sage Scrub NCCP Conservation Guidelines (1993) provide an Evaluation Logic Flow Chart to determine the potential value for long-term conservation of areas containing Coastal Sage Scrub (CSS). The following is an analysis of the value of the CSS impacted on the project site:

- 1. Is natural vegetation present?                      Yes
- 2. Is CSS present?    Yes
- 3. Is land most dense CSS in Subregion?              No
- 4. Is land close to Higher Value District?            Yes

Conclusion: Land has Intermediate Potential Value for Long-term Conservation

Based on the above, the appropriate mitigation ratio for CSS impacts on the project site is 3:1. At a 3:1 ratio a total of 19.08 acres of mitigation is required. The following mitigation strategy has been negotiated with the Wildlife Agencies and agreed upon by all parties:

- 1. Rancho Serena will designate 0.27 acres at the eastern end of the project parcel as permanent biological open space, and the because of its proximity to a significant regional wildlife corridor, the Wildlife Agencies will also allow mitigation credit for the 1.72 acre SDG&E utility easement on the project site. Both these areas (totaling 1.99 acres) will be managed in perpetuity (see below).
- 2. Rancho Serena will acquire 17.09 acres off-site mitigation credits  $[(6.36 \times 3) - 1.99]$ . The total purchase cost of the required mitigation credits is \$598,150 (\$35,000/acre x 17.09 acres) [Conservation credits were only used to determine a fair cost for management endowment] which will be placed with the San Diego Foundation, or similar entity, to be distributed solely for the purpose of management of the 1.99 acres on Rancho Serena and 26.65 acres of existing open space adjacent to Rancho Serena (Figure 7) donated by Martin Boone and SBF Financial LLC to Endangered Habitats Conservancy (EHC). This will expand and maintain a vital regional wildlife corridor and provide management in perpetuity for a total of 28.64 acres. It is anticipated that EHC will manage this acreage. The County and Wildlife Agencies (CDFW and USFWS) shall approve the land manager and any transfers of that responsibility in the future.
- 3. Impacts to 50 San Diego Goldenstar individuals will be mitigated by protecting a significant population (over 5,000 individuals) of the plants on the 303 acre Endangered Habitats Conservancy Crestlake property adjacent to Crestridge Ecological Reserve east of El Cajon. This preservation will exceed the 3:1 mitigation requirement for County List A species. The Rancho



Serena project will fund a five year effort to control and eradicate the South African long-flowered veldtgrass *Ehrharta longiflora*, a highly invasive non-native weed species that is threatening the goldenstar population on the property. The Endangered Habitats Conservancy will receive a flat one-time payment of \$30,000 as a direct payment for this work.

4. Impacts to the one individual Nuttall's Scrub Oak on the project site will not have a significant impact on this species because the single individual will be translocated to the open space area. The transplantation will be supervised by a licensed Landscape Architect and the Project Biologist.

5. Limitations on grading or clearing activities during the bird nesting season (1 February through 31 August) are recommended to reduce impacts to nesting birds. If it is determined by a qualified biologist that no nesting is occurring within 300 feet (for passerine and other non-raptor bird species) or 500 feet (for raptors) of construction activity, such activities may proceed.

6. Due to the steep and isolated location of the proposed biological open space on the project site fencing should not be required. However, signage delineating the open space boundary should be placed along the eastern edge of the SDG&E easement (See Figure 4).

7. In order to prevent any adverse impacts to off-site resources, it is recommended that adequate measures (Best Management Practices) be taken during construction to prevent runoff from entering drainages or other properties. These measures should be sufficient to reduce any possible indirect impacts of the proposed project to a level well below significant.

**Impacts to sensitive biological resources will be mitigated to below a level of significance as defined by CEQA.**

Thank you very much for the opportunity to conduct this work and prepare this report. Please contact me if I can provide any additional information or provide clarification.

Sincerely,



William T. Everett, MS, FN, FRGS, San Diego County Approved Biological Consultant

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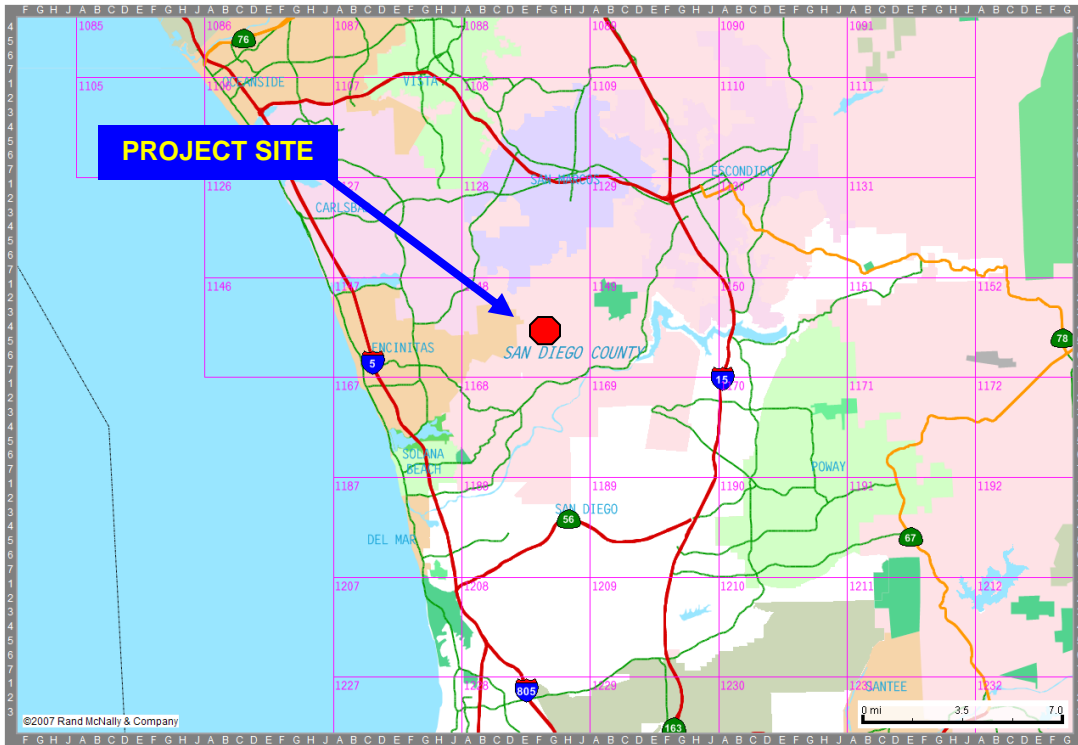


Figure 1. Location of project site in regional context. Thomas Bros. Map page #1148, G5.

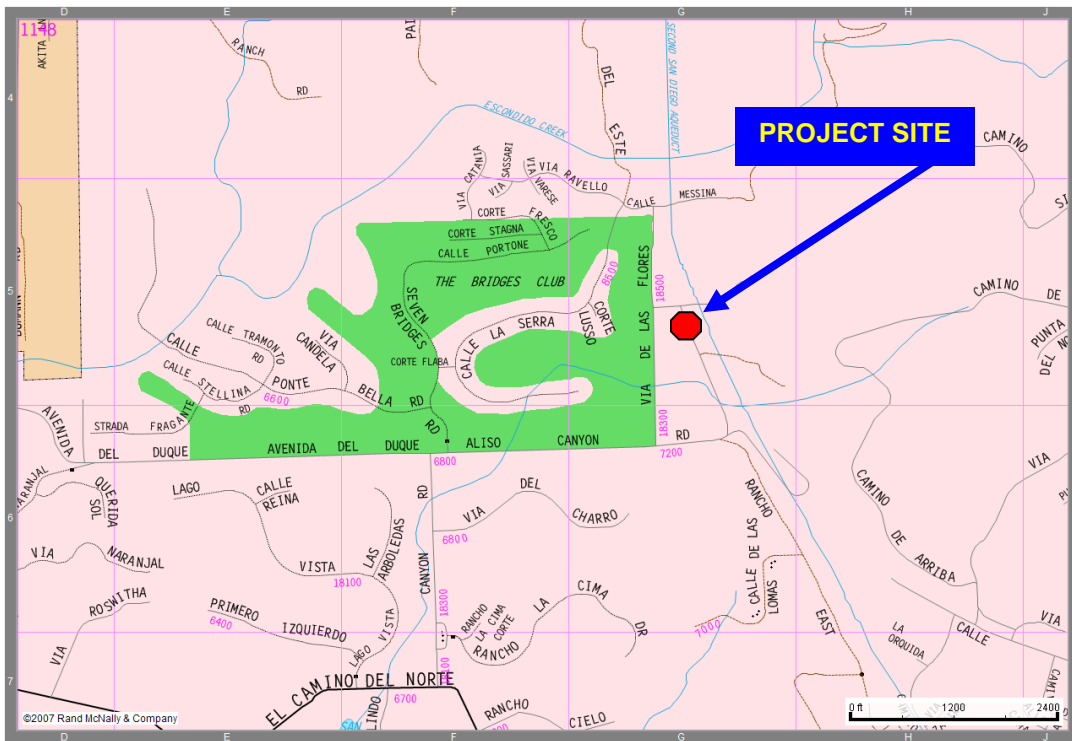


Figure 2. Detail location map of project site. Thomas Bros. Map page #1148, G5.

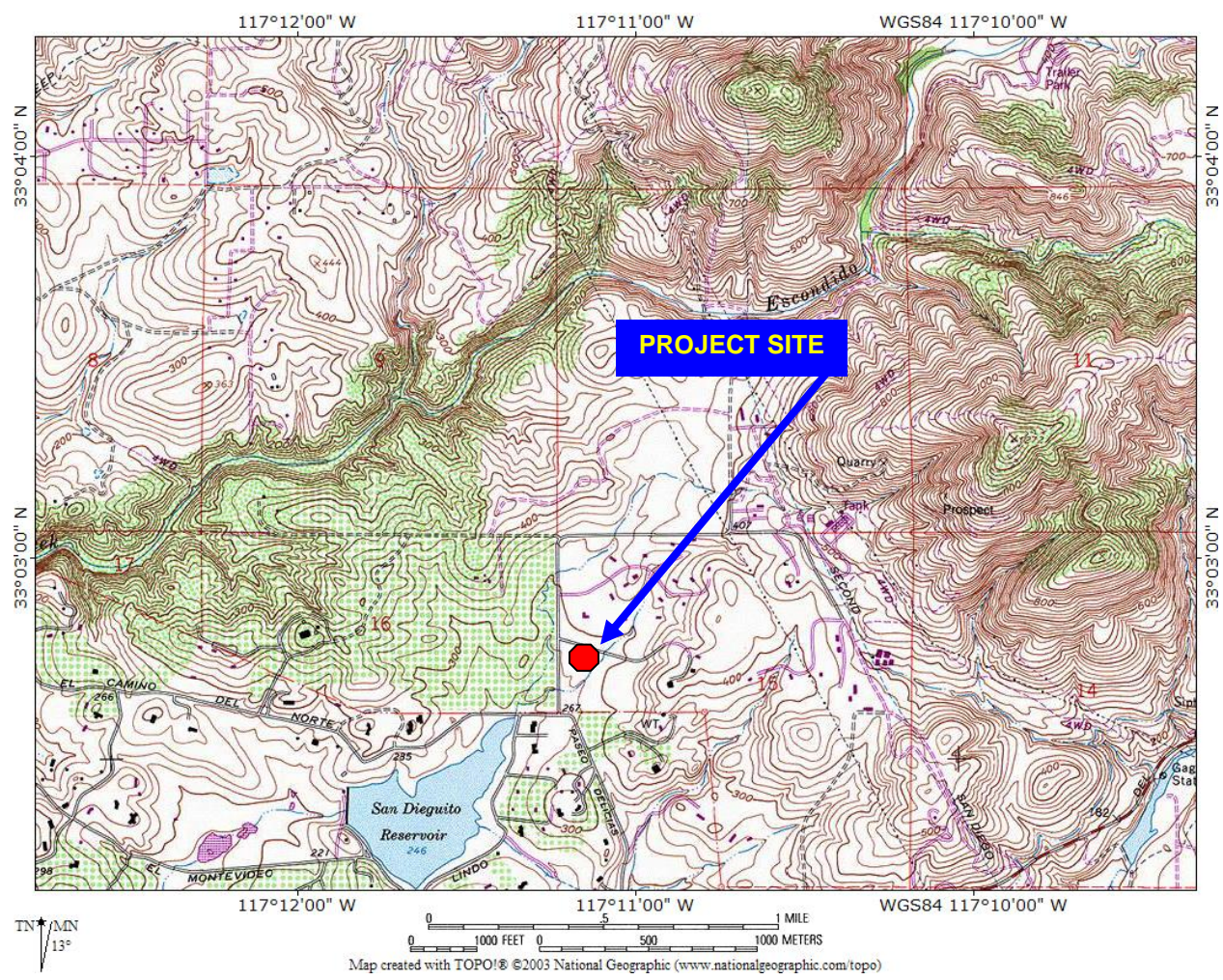


Figure 3. Topographical map showing project site. Taken from USGS Rancho Santa Fe 7.5 minute series quadrangle.

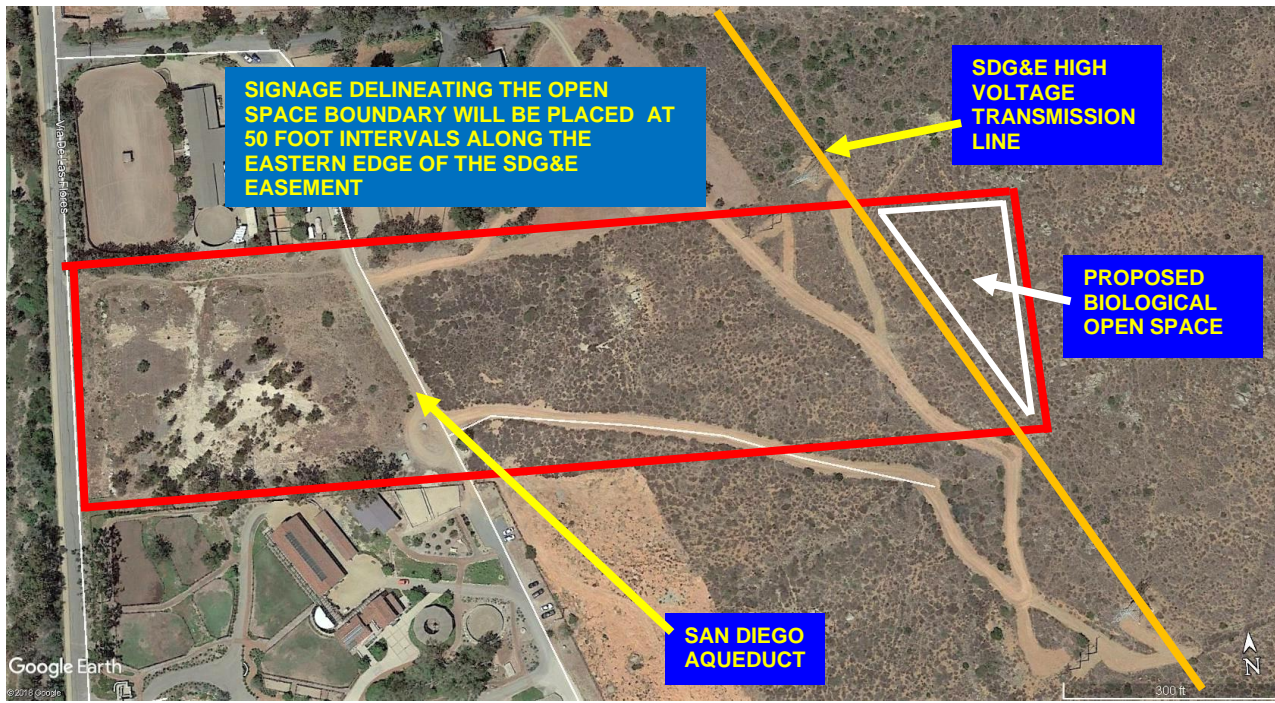


Figure 4. Satellite image (2018) showing project boundaries and proposed open space.



Figure 5. Location of project site in a local context.



Figure 6. Project site in 1994 showing disturbed areas west of the aqueduct.

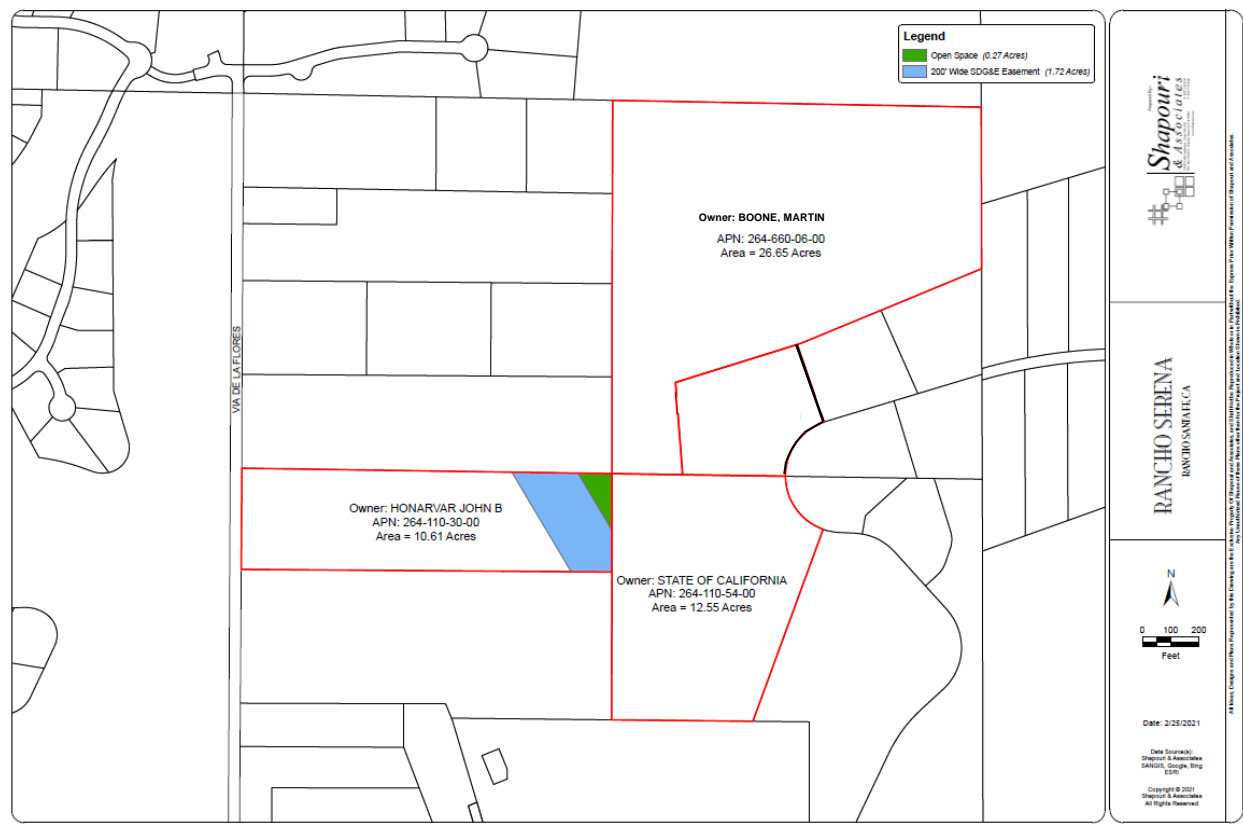


Figure 7. Rancho Serena project site with Boone property to be managed as conserved biological open space.

## APPENDIX A

### PLANT SPECIES OBSERVED ON THE PROJECT SITE

Note: This list contains plant species observed on the site and does not purport to be a complete list of species that occur on the site. Floral lists are compiled to assist in accurate plant community determination and as a byproduct of surveys for sensitive species.

<u>Family</u>	<u>Scientific Name</u>	<u>Common Name</u>
Agavaceae - Agave Family		
	<i>Chlorogalum parviflorum</i>	Soap Plant
Aizoaceae - Carpet-Weed Family		
	* <i>Carpobrotus edulis</i>	Hottentot fig
Anacardiaceae - Sumac Family		
	<i>Malosma laurina</i>	Laurel Sumac
	<i>Rhus ovata</i>	Sugarbush
	* <i>Schinus mole</i>	Peruvian Pepper Tree
Apiaceae (Umbelliferae) - Carrot Family		
	* <i>Foeniculum vulgare</i>	Sweet Fennel
Asteraceae (Compositae) - Sunflower Family		
	<i>Ambrosia psilostachya</i>	Ragweed
	<i>Artemisia californica</i>	California Sagebrush
	<i>Baccharis pilularis</i>	Coyote Brush
	* <i>Centaurea melitensis</i>	Tocalote
	* <i>Cirsium</i> sp.	Thistle
	<i>Deinandra fasciculata</i>	Tarplant
	<i>Encelia californica</i>	Bush Sunflower
	<i>Eriophyllum confertiflorum</i>	Golden Yarrow
	* <i>Glebionis coronaria</i>	Crown Daisy
	<i>Pseudognaphalium californicum</i>	California Everlasting
	* <i>Taraxacum erythrospermum</i>	Common Dandelion



## Brassicaceae (Cruciferae) - Mustard Family

\**Hirschfeldia incana*

Short-Pod Mustard

\**Raphanus sativus*

Wild Radish

## Cactaceae - Cactus Family

\**Opuntia ficus-indica*

Indian Fig

## Chenopodiaceae - Goosefoot Family

\**Salsola tragus*

Russian Thistle

## Convolvulaceae - Morning Glory Family

*Calystegia longipes*

Morning-Glory

## Cucurbitaceae - Gourd Family

*Marah macrocarpus*

Wild Cucumber

## Euphorbiaceae - Spurge Family

\**Ricinus communis*

Castor bean

## Fabaceae - Pea Family

*Acmispon glaber*

Deerweed

\**Vicia villosa*

Winter Vetch

## Fagaceae - Oak Family

***Quercus dumosa*****Nuttall's Scrub Oak**

## Gentianaceae - Gentian Family

*Zeltnera venusta*

Conchalagua

## Geraniaceae - Geranium Family

\**Erodium* sp.

Filaree

## Iridaceae - Iris Family

*Nasella bellum*

Blue-eyed Grass

## Lamiaceae (Labiatae) - Mint Family

*Salvia mellifera*

Black Sage

## Liliaceae - Lily Family

*Calochortus splendens*

Splendid Mariposa Lily

## Malvaceae - Mallow Family

*Malacothamnus fasciculatus*

Coastal Bushmallow

\**Malva parviflora*

Cheeseweed

## Myrtaceae - Myrtle Family

\**Eucalyptus* sp.

Eucalyptus

## Myrsinaceae - Myrsine Family

\**Anagallis arvensis*

Scarlet Pimpernel

## Plantaginaceae - Plantain Family

*Antirrhinum nuttallianum* ssp. *nuttallianum*

Nuttall's Snapdragon

## Plumbaginaceae - Leadwort Family

\**Limonium perezii*

Canary Island Sea-Lavender

## Poaceae (Gramineae) - Grass Family

\**Arundo donax*

Giant Reed

\**Avena* sp.

Wild Oats

*Bromus carinatus*

California Brome

\**Bromus diandrus*

Ripgut Grass

\**Bromus hordeaceus*

Soft Chess

\**Bromus madritensis* ssp. *madritensis*

Red Brome

\**Bromus madritensis* ssp. *rubens*

Red Brome

\**Vulpia myuros*

Rattail Fescue

## Polygonaceae - Buckwheat Family

*Eriogonum fasciculatum* ssp. *fasciculatum*

California Buckwheat

\**Rumex crispus*

Curley Dock

Scrophulariaceae - Figwort Family

*Diplacus aurantiacus*

Orange Bush Monkey-Flower

Themidaceae - Brodiaea Family

*Bloomeria clevelandii*

*Dichelostemma capitatum*

**San Diego Goldenstar**

Blue Dicks

\* = Non-native species

## APPENDIX B

### WILDLIFE SPECIES OBSERVED OR DETECTED ON THE PROJECT SITE

#### BIRDS

Anna's Hummingbird	<i>Calypte anna</i>
Red-tailed Hawk	<i>Buteo jamaicensis</i>
<b>Turkey Vultures</b>	<b><i>Cathartes aura</i></b>
Mourning Dove	<i>Zenaida macroura</i>
<b>California Gnatcatcher</b>	<b><i>Polioptila californica</i> (Observed twice in 2020)</b>
Western Kingbird	<i>Tyrannus verticalis</i>
Northern Mockingbird	<i>Mimus polyglottos</i>
House Finch	<i>Haemorhous mexicanus</i>
California Towhee	<i>Pipilo crissalis</i>

#### MAMMALS

Botta's Pocket Gopher <i>Thomomys bottae</i>	Burrows
<b>Southern Mule Deer</b> <i>Odocoileus hemionus</i>	Shed antler

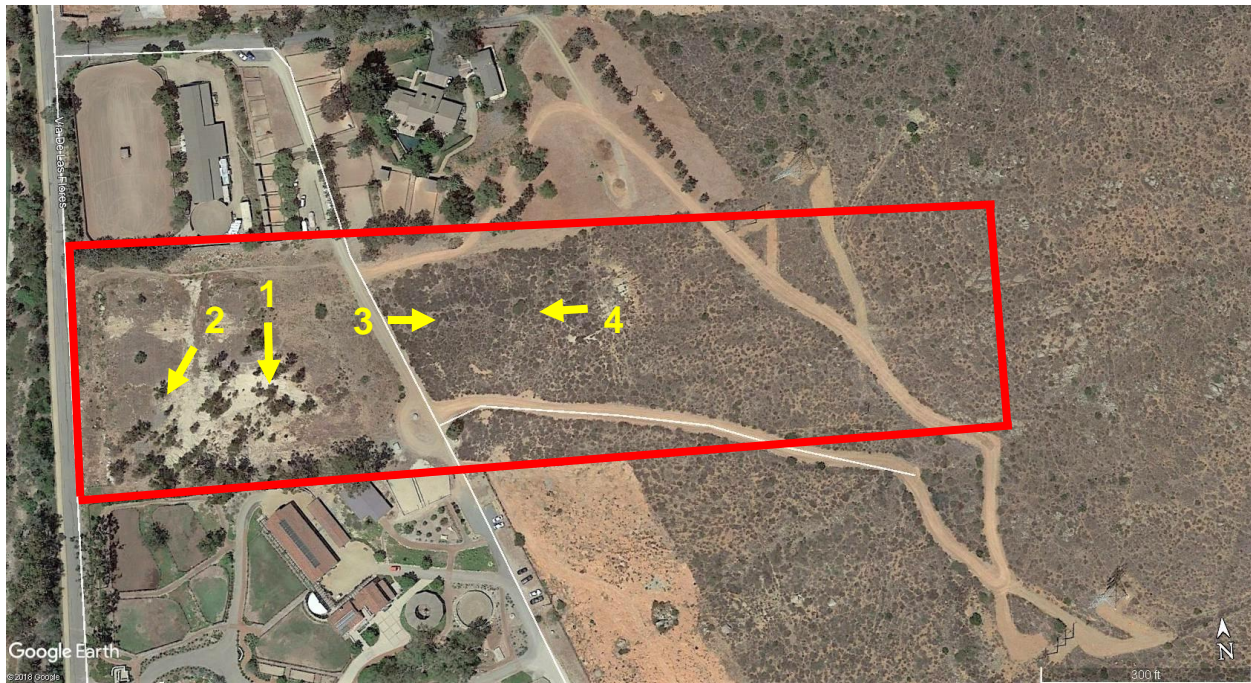
#### AMPHIBIANS AND REPTILES

Western Fence Lizard <i>Sceloporus occidentalis</i>	Observed
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## **APPENDIX C**

### **PHOTOGRAPHS OF THE PROJECT SITE**

All photographs taken 2019 by W.T. Everett



## PHOTOGRAPH INDEX

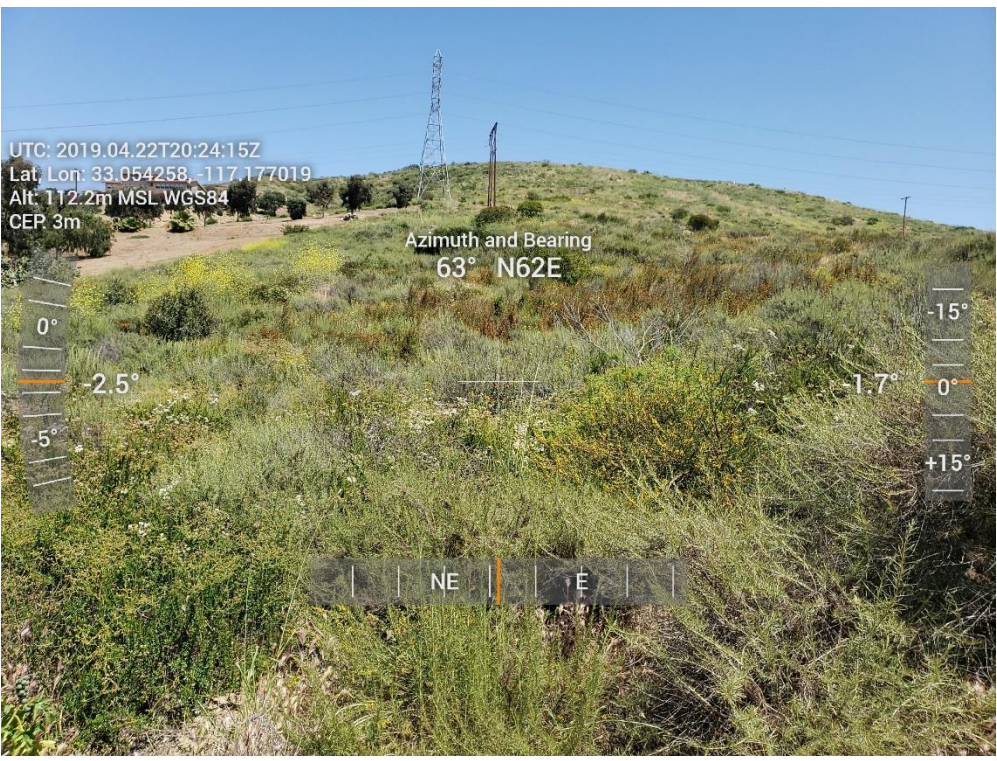
Yellow arrows and numbers indicate the locations and directions from which the following photographs were taken:



Photograph 1. View from lower pad area looking south.



Photograph 2. View of lower pad area adjacent to Via De Las Flores.



Photograph 3. View from San Diego Aqueduct looking east.



Photograph 4. View looking west from the center of the site.



## APPENDIX D

### COUNTY LIST OF SENSITIVE SPECIES WITH POTENTIAL TO OCCUR ON THE PROJECT SITE

#### Legend

#### Status

- 1 = Federally Endangered
- 2 = Federally Threatened
- 3 = State Endangered
- 4 = State Threatened
- 5 = State Rare
- 6 = MSCP Narrow Endemic
- 7 = Not Listed
- 8 = County Sensitive Plant List Designation (A-D)
- Ext = Extirpated

#### Potential to Occur On-site

Note: Species shown in **bold** are those for which Directed Surveys were conducted

L = Low

M = Moderate

H = High

U = Unknown (Sufficient data are not available on the status, distribution, abundance, or natural history of the species to make a reliable determination of the probability of occurring on-site.)

#### Rationale

- 1 = Would likely have been detected during directed surveys if present.
- 2 = Appropriate suitable habitat not present on-site. Habitat type may be present on-site, but is likely disturbed, fragmented, isolated, small in extent, dominated by edge effects, may not have appropriate soil type, micro habitat conditions, or is otherwise not suitable for use by the sensitive species.
- 3 = Insufficient natural history information is available to determine if presence is likely.

Common Name	Scientific Name	Status	Observed On-Site (Y or N)	Potential to Occur On-site	Habitat Preferences
<b>San Diego thornmint</b>	<i>Acanthomintha ilicifolia</i>	<b>2,3, 8A</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools</b>

San Diego needlegrass	<i>Achnatherum diegoense</i>	7, 8A	N	L - 1	Coastal Sage Scrub, Grassland, Salt or Alkali Marsh
<b>San Diego adolphia</b>	<i>Adolfia californica</i>	<b>7, 8B</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub, Grassland</b>
<b>Shaw's agave</b>	<i>Agave shawii</i>	<b>7, 8B</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub</b>
<b>San Diego ambrosia</b>	<i>Ambrosia pumila</i>	<b>1, 6, 8A</b>	N	<b>L - 1, 2</b>	<b>Riparian, Freshwater Marsh</b>
<b>Aphanisma</b>	<i>Aphanisma blitoides</i>	<b>7, 8A</b>	N	<b>L - 2</b>	<b>Coastal Sage Scrub, Coastal or Desert Dune</b>
Palmer's sage	<i>Artemisia palmeri</i>	7, 8B	N	L - 2	Coastal Sage Scrub, Riparian
<b>South coast saltbush</b>	<i>Atriplex pacifica</i>	<b>7, 8A</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub, Chamise Chaparral</b>
<b>Golden snake cactus</b>	<i>Bergerocactus emoryi</i>	<b>7, 8B</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub</b>
<b>San Diego Goldenstar</b>	<i>Bloomeria clevelandii</i>	<b>7,8A</b>	Y	<b>H</b>	<b>Coastal Sage Scrub, Grassland, Oak Woodland, Chamise Chaparral, Vernal Pools</b>
Lewis sun cup	<i>Camissonia lewsii</i>	7, 8C	N	L - 2	Coastal Sage Scrub, Grassland
Brewer's calandrinia	<i>Calandrinia breweri</i>	7, 8D	N	L - 2	Coastal Sage Scrub, Mixed Chaparral
Seaside calandrinia	<i>Calandrinia maritima</i>	7, 8D	N	L - 2	Coastal Sage Scrub
<b>Slender pod jewelflower</b>	<i>Caulanthus stenocarpus</i>	<b>5, 8D</b>	N	<b>L - 2</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Oak Woodland</b>
<b>Orcutt's pincushin</b>	<i>Chaenactis glabriuscula orcuttiana</i>	<b>7, 8A</b>	N	<b>L - 2</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral</b>
<b>Prostrate spineflower</b>	<i>Chorizanthe procumbens</i>	<b>7</b>	N	<b>L - 2</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral</b>
Small-flowered morning glory	<i>Convolvulus simulans</i>	7, 8D	N	L - 2	Non-Native Grassland
<b>Sea dahlia</b>	<i>Coreopsis maritima</i>	<b>7, 8B</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub, Mixed Chaparral</b>
<b>San Diego sand aster</b>	<i>Corethrogyne filaginifolia incana</i>	<b>7, 8A</b>	N	<b>L - 1</b>	<b>Coastal Sage Scrub, Chamise Chaparral</b>

San Dieguito sand aster	<i>Corethrogyne filaginifolia linifolia</i>	7, 8A	N	L - 1	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
Western dichondra	<i>Dichondria occidentalis</i>	7, 8D	N	L - 1	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
Blochman's dudleya	<i>Dudleya blochmaniae blochmaniae</i>	7, 8A	N	L - 1	Coastal Sage Scrub
Many stemmed dudleya	<i>Dudleya multicaulis</i>	7, 8A	N	L - 2	Coastal Sage Scrub, Mixed Chaparral
Variegated dudleya	<i>Dudleya variegata</i>	7, 6, 8A	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Vernal Pools
Sticky dudleya	<i>Dudleya viscida</i>	7, 8A	N	L - 1	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
Palmer's goldenbush	<i>Ericameria palmeri</i> ssp. <i>Palmeri</i>	7, 8B	N	L - 2	Coastal Sage Scrub, Mixed Chaparral
Large leaf fillary	<i>Erodium macrophyllum</i> var. <i>macrophyllum</i>	7, 8B	N	L - 2	Coastal Sage Scrub, Native Grassland
San Diego button celery	<i>Eryngium aristulatum parishii</i>	2,3, 8A	N	L - 2	Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools
Cliff spurge	<i>Euphorbia misera</i>	7, 8B	N	L - 1	Coastal Sage Scrub
Coast barrel cactus	<i>Ferocactus viridescens</i>	7, 8B	N	L - 1	Coastal Sage Scrub
Mission canyon blue cup	<i>Githopsis diffusa filicaulis</i>	7, 8C	N	L - 2	Coastal Sage Scrub, Mixed Chaparral
Orcutt's hazardia	<i>Hazardia orcuttii</i>	7, 8A	N	L - 1	Coastal Sage Scrub
Mesa horkelia	<i>Horkelia cuneata puberula</i>	7, 8A	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
Decumbent goldenbush	<i>Isocoma menziesii decumbens</i>	7, 8A	N	L - 1	Coastal Sage Scrub, Chamise Chaparral, Vernal Pools

<b>San Diego marsh elder</b>	<i>Iva hayesiana</i>	<b>7, 8B</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub, Grassland, Salt or Alkali Marsh</b>
California box-thorn	<i>Lycium californicum</i>	7, 8D	N	L - 2	Mixed Chaparral
Rush like bristle bush	<i>Machaeranthera juncea</i>	7, 8D	N	L - 2	<b>Coastal Sage Scrub, Chamise Chaparral</b>
<b>Willow monardella</b>	<i>Monardella linoidea viminea</i>	<b>1,3, 8A</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Riparian</b>
California spine flower	<i>Mucronea californica</i>	7, 8D	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Coastal or Desert Dune
Little mousetail	<i>Myosurus minimus apus</i>	7, 8C	N	L - 2	Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools
<b>Spreading navarretia</b>	<i>Navarretia fossalis</i>	<b>2, 8A</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools</b>
<b>Snake cholla</b>	<i>Opuntia parryi serpentina (O. californica)</i>	<b>6, 7, 8A</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub</b>
Golden-rayed pentachaeta	<i>Pentachaeta aurea</i>	7, 8D	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
<b>Brand's phacelia</b>	<i>Phacelia stellaris</i>	<b>7, 8A</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Coastal or Desert Dune</b>
Cooper's rein orchid	<i>Piperia cooperi</i>	7, 8D	N	L - 2	Grassland, Chamise Chaparral
<b>Nuttall's scrub oak</b>	<i>Quercus dumosa</i>	<b>7, 8A</b>	<b>Y</b>	<b>H</b>	<b>Coastal Sage Scrub</b>
Mesa club moss	<i>Selaginella cinerascens</i>	7, 8D	N	L - 1	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral
San Diego sunflower	<i>Viguiera laciniata</i>	7, 8D	N	L - 1	Coastal Sage Scrub
<b>La Purissima viguiera</b>	<i>Viguiera purissinae</i>	<b>7, 8A</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub</b>
Robinson's beetle	<i>Phobetus robinsoni</i>	7	N	L - 2	Riparian, Desert Wash

<b>Quino checkerspot butterfly</b>	<i>Euphydryas editha quino</i>	1	N	L – 2	<b>Coastal Sage Scrub, Grassland, Chamise Chaparral, Desert Scrub, Vernal Pools</b>
<b>Hermes copper</b>	<i>Lycaena hermes</i>	7	N	L – 2	<b>Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral</b>
Giant coastal skipper	<i>Megathymus yuccae harbisoni</i>			L – 2	Coastal Sage Scrub, Mixed Chaparral
Western spadefoot toad	<i>Scaphiopus hammondii</i>	7	N	L – 1	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Freshwater Marsh, Vernal Pools
<b>San Diego banded gecko</b>	<i>Coleonyx variegates blainvillei</i>	7	N	L – 2	<b>Riparian, Freshwater Marsh, Montane Meadow, Lakes and Bays</b>
San Diego horned lizard	<i>Phrynosoma coronatum blainvillei</i>	7	N	L – 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Chamise Chaparral, Mixed Conifer
Coronado skink	<i>Eumeces skiltonianus interparietalis</i>	7	N	L – 2	Coastal Sage Scrub, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh
<b>Orange-throated whiptail</b>	<i>Cnemidophorus hyperythrus</i>	7	N	L – 2	<b>Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Chamise Chaparral</b>
Silvery legless lizard	<i>Anniella pulchra pulchra</i>	7	N	L – 2	Coastal Sage Scrub, Grassland, Riparian, Coastal or Desert Dune

Coastal rosy boa	<i>Charina trivirgata roseoffusca</i>	7	N	L – 2	Coastal Sage Scrub, Mixed Chaparral, Oak Woodland, Chamise Chaparral
Northern red diamond rattlesnake	<i>Crotalus 32ubber ruber</i>	7	N	L – 2	Coastal Sage Scrub, Mixed Chaparral Chamise Chaparral, Pinon Juniper, Desert Scrub
San Diego ringneck snake	<i>Diadophis punctatus similis</i>	7	N	L – 2	Coastal Sage Scrub, Mixed Chaparral, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest
Coast patch- nosed snake	<i>Salvadora hexalepis virgultea</i>	7	N	L – 2	Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral, Freshwater Marsh
Yuma myotis	<i>Myotis yumanensis</i>	7	N	U	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays
Pallid bat	<i>Antrozous pallidus</i>	7	N	U	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow
Mexican long- tongued bat	<i>Choeronycteris mexicana</i>	7	N	L	Coastal Sage Scrub, Desert Scrub, Desert Wash

California leaf-nosed bat	<i>Macrotus californicus</i>	7	N	L	Coastal Sage Scrub, Mixed Chaparral, Riparian, Desert Scrub, Desert Wash
Pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	7	N	U	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays
Big free-tailed bat	<i>Nyctinomops macrotis</i>	7	N	U	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays
Greater western mastiff bat	<i>Eumops perotis californicus</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays

<b>Stephen's kangaroo rat</b>	<i>Dipodomys stephensi</i>	1, 4	N	L - 2	Coastal Sage Scrub, Grassland
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	7	N	L - 1	Coastal Sage Scrub, Riparian, Oak Woodland, Chamise Chaparral
<b>Pacific pocket mouse</b>	<i>Perognathus longimembris</i>	<b>1</b>	<b>N</b>	<b>L - 3</b>	<b>Coastal Sage Scrub, Grassland, Coastal or Desert Dune</b>
Dulzura California pocket mouse	<i>Chaetodipus californicus femoralis</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer
Northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Chamise Chaparral, Desert Scrub, Desert Wash
Mountain lion	<i>Felis concolor</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow
Southern mule deer	<i>Odocoileus hemionus</i>	7	Y	H	Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow



San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest
Southern grasshopper mouse	<i>Onychomys torridus Ramona</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Chamise Chaparral
American badger	<i>Taxidea taxus</i>	7	N	L - 2	Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow
<b>Golden eagle</b>	<b><i>Aquila chrysaetos</i></b>	<b>6</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper</b>
<b>Northern Harrier</b>	<b><i>Circus cyaneus hudsonius</i></b>	<b>7</b>	<b>N</b>	<b>L - 2</b>	<b>Grassland, Freshwater Marsh, Salt or Alkali Marsh</b>
<b>Cooper's hawk</b>	<b><i>Accipiter cooperi</i></b>	<b>7</b>	<b>N</b>	<b>L - 2</b>	<b>Grassland, Riparian, Oak Woodland</b>
<b>Sharp-shinned hawk</b>	<b><i>Accipiter striatus</i></b>	<b>7</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Oak Woodland, Mixed Conifer</b>
<b>Turkey vulture</b>	<b><i>Cathartes aura</i></b>	<b>7</b>	<b>Y</b>	<b>H</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest</b>

<b>Burrowing Owl</b>	<i>Athene cunicularia hypugea</i>	<b>7</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub, Grassland, Desert Wash, Coastal or Desert Dune</b>
<b>Bank Swallow</b>	<i>Riparia riparia</i>	<b>4</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Riparian, Freshwater Marsh</b>
<b>California Gnatcatcher</b>	<i>Polioptila californica californica</i>	<b>2</b>	<b>Y</b>	<b>H</b>	<b>Coastal Sage Scrub</b>
<b>San Diego cactus wren</b>	<i>Campylorhynchus brunneicapillus cousi</i>	<b>7</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub</b>
<b>Loggerhead shrike</b>	<i>Lanius ludovicianus</i>	<b>7</b>	<b>N</b>	<b>L - 2</b>	<b>Coastal Sage Scrub, Grassland, Riparian, Oak Woodland, Desert Scrub, Desert Wash</b>
<b>Rufous-crowned sparrow</b>	<i>Aimophila ruficeps canescens</i>	<b>7</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub, Chamise Chaparral</b>
<b>Bell's sage sparrow</b>	<i>Amphispiza belli belli</i>	<b>7</b>	<b>N</b>	<b>L - 1</b>	<b>Coastal Sage Scrub, Mixed Chaparral, Chamise Chaparral</b>

**EVERETT AND ASSOCIATES**  
**ENVIRONMENTAL CONSULTANTS**  
ESTABLISHED IN 1975

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(858) 456-2990 TELEPHONE  
everett@esrc.org EMAIL

**APPENDIX E**

17 June 2019

Ali Shapouri, AICP CEP  
Shapouri & Associates  
10829 Calle Ambiente, Suite 501  
Rancho Santa Fe, CA 92067

Note: California Gnatcatchers were subsequently observed on the site twice during 2020
--

**Re: RANCHO SERENA PROJECT SITE CALIFORNIA GNATCATCHER SURVEYS**

Dear Mr. Shapouri,

This report presents the results of three focused presence/absence surveys that I recently conducted for the federally threatened Coastal California Gnatcatcher *Polioptila californica californica*. The surveys were conducted within the approximately 10 acre Rancho Serena project site on in the community of Rancho Santa Fe, San Diego County.

The California Gnatcatcher is a federal threatened species, a state species of concern, and is a "target species" of the NCCP process. This species is a non-migratory resident whose range covers the coastal plains and foothills of Southern California and northern Baja California. In San Diego County, it is widespread in coastal lowlands below about 2,000 feet elevation and typically occurs in or near Coastal Sage Scrub (CSS). The California Gnatcatcher population is seriously declining due to loss of habitat. Between 85% and 90% of this species' habitat has been lost to urban or agricultural development. It is almost extirpated from Ventura, San Bernadino, and Los Angeles counties. The U.S. population is estimated to be just under 5000 pairs. San Diego County appears to be the center of abundance within the United States for this species.

The survey site is located on the east side of Via De Las Flores across the street from The Bridges golf course (Figures 1 and 2). The approximate USGS coordinates of the site are 33°03'N, 117°11'W as determined on-site by Global Positioning System (GPS) receiver (Rancho Santa Fe 7.5 minute series quadrangle, see Figure 3). The elevation of the site ranges from 280 to 650 feet, with topography consisting of a gentle west-facing slope increasing in elevation to the east end of the site.

**BIOLOGICAL SETTING**

The site was burned in the 2007 Witch Fire, and is still undergoing the process of plant community succession towards recovery. The area to the east of the aqueduct easement contains sparse, typical CSS species, including California sagebrush *Artemesia californica*, California buckwheat *Eriogonum fasciculatum* ssp. *fasciculatum*, laurel sumac *Malosma laurina* and other common species. The remainder of the site contains Disturbed Habitat.

## METHODS

I surveyed the site three times in conformance with current U.S. Fish and Wildlife Service (USFWS) protocol guidelines. The surveys were conducted under the authority granted to me by USFWS permit # TE-788036. The surveys were conducted by slowly walking routes within the survey site. After stopping, listening, and observing at intervals of approximately 30 meters, recorded Coastal California Gnatcatcher vocalizations were played for 30 seconds. After the vocalizations were played, an additional two minutes were spent observing and listening before moving to the next observation site. Weather conditions and time of day were appropriate for the detection of Coastal California Gnatcatchers (Table 1).

**TABLE 1**  
**SCHEDULE OF SURVEYS AND CONDITIONS**

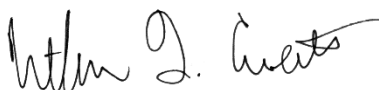
<b>Date</b>	<b>Time (hours)</b>	<b>Temperature (°F)</b>	<b>Wind Speed (mph)</b>	<b>Cloud Cover (%)</b>
4/22/19	0810-1040	61 - 67	0	5
5/15/19	0930-1200	62 - 64	0	100
6/03/19	0845-1100	64 - 66	0	100

## Results

No California Gnatcatchers were detected during the focused surveys. The CSS onsite appears suitable for occupation by California Gnatcatchers.

Thank you very much for the opportunity to conduct this work and prepare this report. Please contact me if you need any additional information or clarification.

Sincerely,



William T. Everett  
 Certified Biological Consultant  
 U.S. Fish & Wildlife Service California Gnatcatcher  
 Survey Authorization Permit # TE-788036

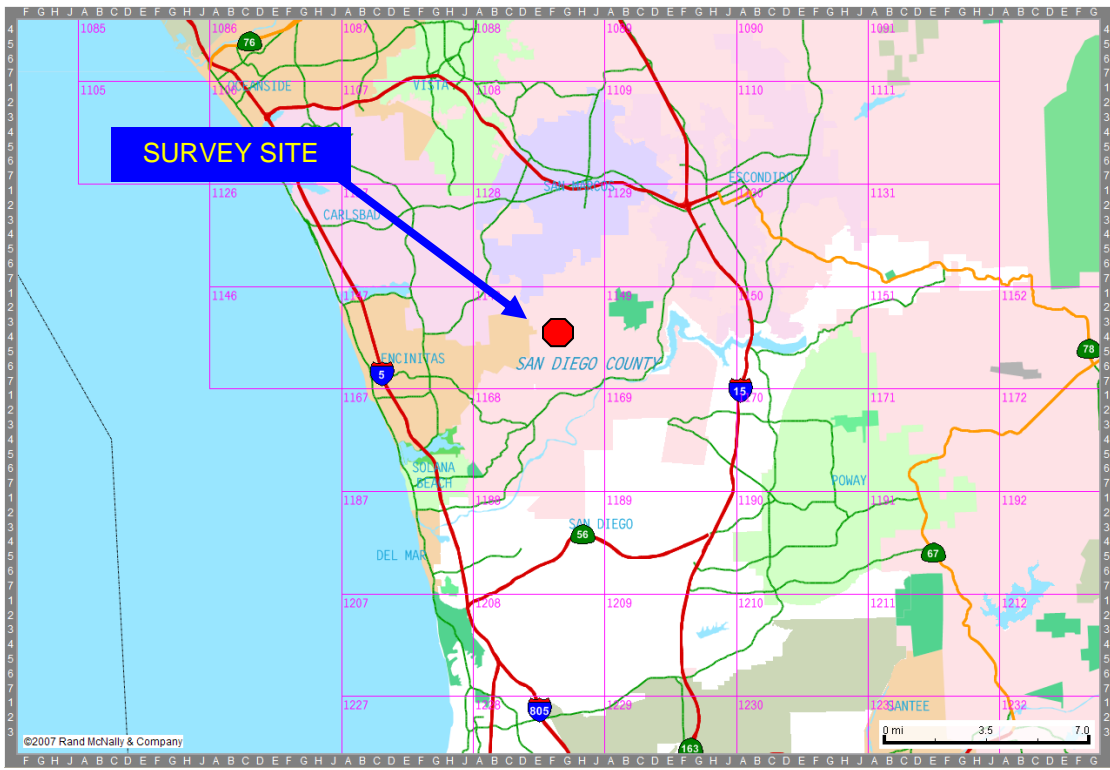


Figure 1. Location of survey site in regional context. Thomas Bros. Map page #1148, G5.

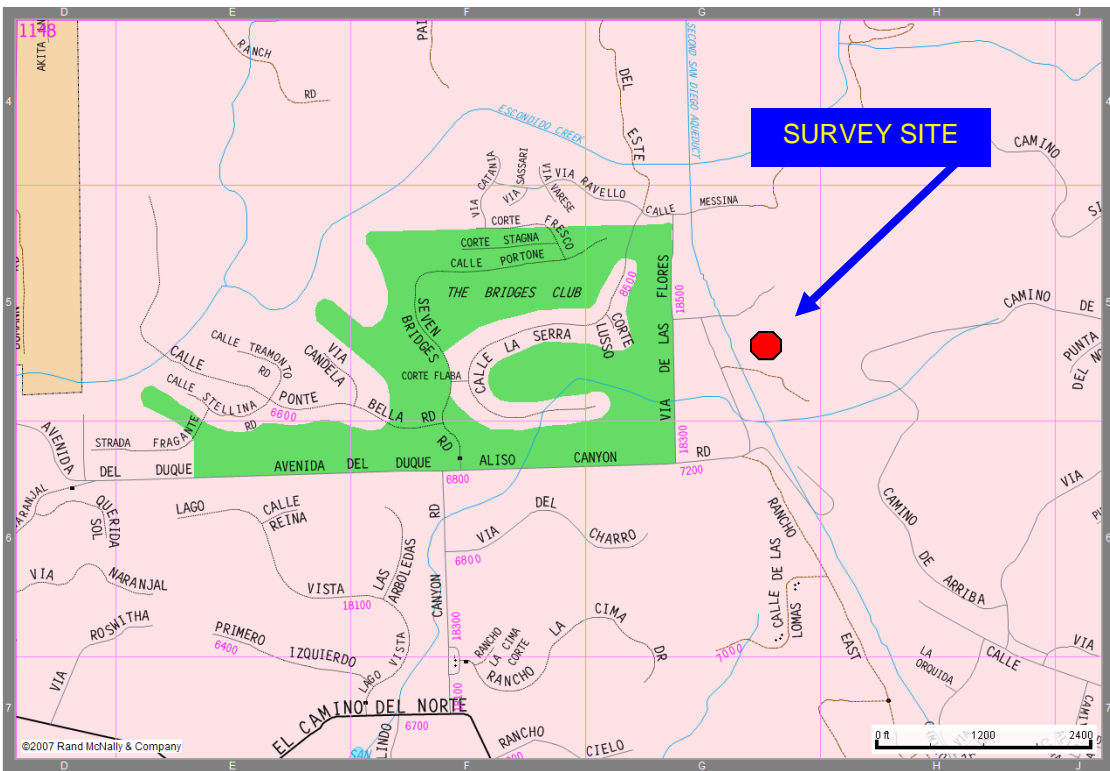


Figure 2. Detail location map of survey site. Thomas Bros. Map page #1148, G5.

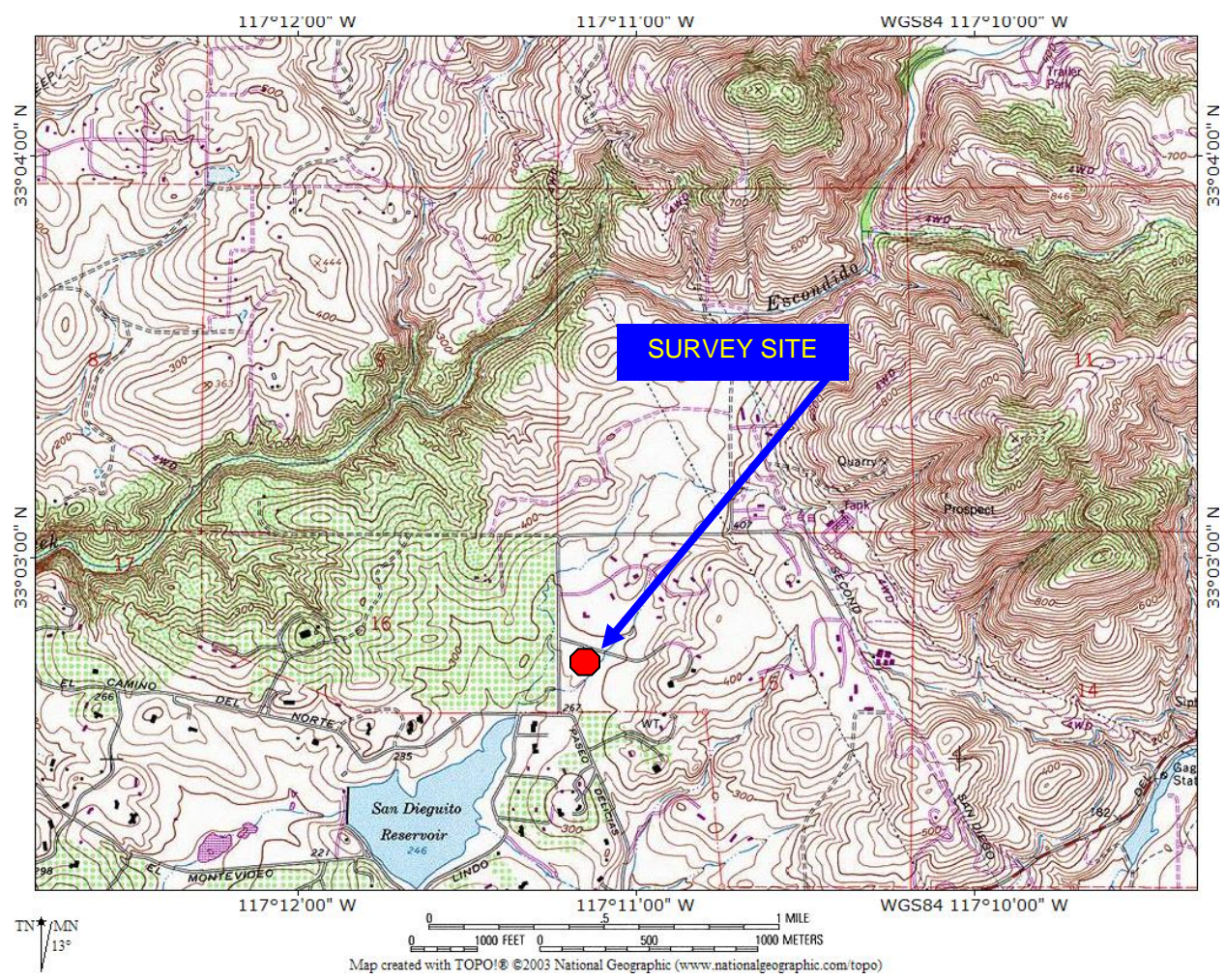


Figure 3. Topographical map showing survey site. Taken from USGS Rancho Santa Fe 7.5 minute series quadrangle.

**APPENDIX F**

**LETTER FROM THE ENDANGERED HABITATS CONSERVANCY  
REGARDING PROGRAM TO ERADICATE LONG-FLOWERED VELDTGRASS**

**ENDANGERED HABITATS CONSERVANCY**  
 PRESERVING BIODIVERSITY THROUGH HABITAT ACQUISITION & STEWARDSHIP



October 10, 2021

To: Ali Shapouri  
 From: Michael Beck, Endangered Habitats Conservancy

**Regarding:** Potential mitigation for Rancho Serena development impacts to ~ 60 San Diego Goldenstar (*Bloomeria clevelandia*).

Dear Ali,

The Endangered Habitats Conservancy is under contract to complete the purchase the 303-acre Crestlake property adjacent to the Crestridge Ecological Reserve by end of year 2021. Property management will be integrated into EHC's larger complex of properties within the Greater Crestridge Ecological Reserve complex.

The Crestlake property includes a significant population of San Diego Goldenstar, numbering in the thousands of plants. This population has been monitored by the Conservation Biology Institute six times since 2014, and is stable with population numbers fluctuating according to rainfall. (The figures enclosed depict the extent of *Bloomeria clevelandii* in 2019 and 2021. In 2019 approximately 5,022 plants were mapped on 3.95 acres; in 2021 approximately 1,786 plants were mapped on 2.85 acres.)

The Crestlake *Bloomeria* population is threatened by the invasive non-native long-flowered veldtgrass, *Ehrharta longiflora*\*.

As a habitat management option for the Rancho Serena mitigation obligation, EHC proposes to control, with the goal of eradicating on site, the veldtgrass threatening the *Bloomeria* population at Crestlake. EHC staff are licensed for herbicide application. We will initiate a 5-year management plan and provide annual reports to the wildlife agencies and County of San Diego. One time cost is \$30,000.

**\* Cal-IPC:**

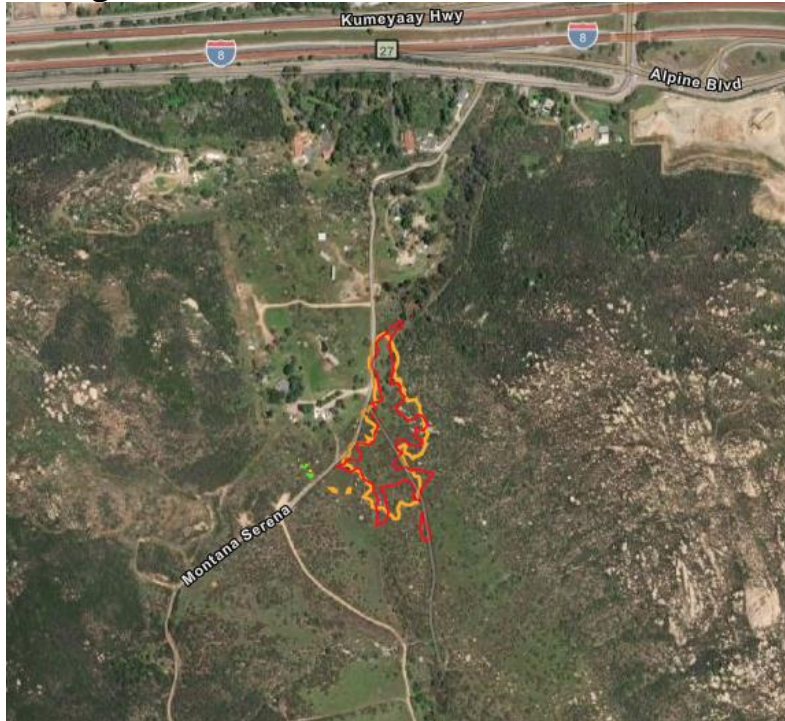
*"Ehrharta longiflora* (long-flowered veldtgrass) is an annual grass (family Poaceae) found on California's south coast, especially near San Diego. Long-flowered veldtgrass was recently introduced to California and is not currently widespread, but it has the potential to spread rapidly in coastal dune and scrub habitats. It may exclude native species in these habitats."



Crestlake - *Bloomeria clevelandii* extent (Zoom out)

Red = 2021 extent

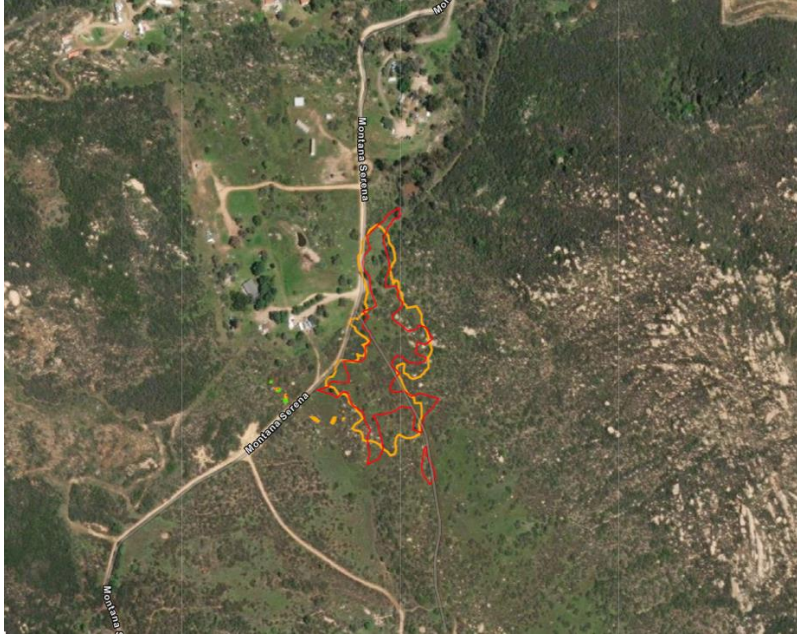
Orange = 2019 extent



Crestlake - *Bloomeria clevelandii* extent (Zoom in)

Red = 2021 extent

Orange = 2019 extent



*Ehrharta longiflora* at Crestlake (2021)



## APPENDIX G

### PREPARER QUALIFICATIONS

**William T. Everett** is a research, consulting, and conservation biologist with more than 44 years' experience in the San Diego environment and around the world. He has logged more than 14,000 hours of field work, all detailed with field notes. In the 1970's Bill apprenticed in the study of chaparral ecology under Frank Gander, the retired but renown premier California botanist of the 1930s and 40s. Although his specialty is ornithology, Bill has a long-standing interest in all endangered species management and conservation issues. As President then Conservation Chairman of the San Diego Chapter of the Audubon Society in the late 1970s, he gained a keen understanding of the conservation challenges facing a growing Southern California. He subsequently became one of the first Biological Consultants certified by the County of San Diego in the 1980s. Bill is a Fellow of the National Association of Environmental Professionals (NAEP) and subscribes to the NAEP Code of Ethics and Standards of Practice for Environmental Professionals.

Bill Everett has conducted research in Southern California, Alaska, Antarctica, Baja California, South America, and throughout the tropical Pacific Ocean. His work has been published in the *Journal of Zoo and Wildlife Medicine*, the *Wildlife Society Bulletin*, the *Condor*, *Western Birds*, *Le Gerfaut* (Belgium), *Proceedings of the Western Foundation of Vertebrate Zoology*, *Marine Ornithology*, *Transactions of the San Diego Society of Natural History*, *Arctic*, *Birds of the World* (Cornell University), *Environment Southwest*, the *Proceedings of the California Academy of Science*, and various popular article outlets.

In 1977, in recognition of his accomplishments, he was appointed as a Research Associate of the Department of Birds and Mammals of the San Diego Natural History Museum, a position he holds to this day. In 1990 he was elected as a Research Fellow of the Zoological Society of San Diego, and in 1988 was appointed as the Senior Conservation Biologist of the Western Foundation of Vertebrate Zoology. The Royal Geographic Society of London elected Bill as a Fellow in 1996, following his election as a Fellow of the Explorers Club in 1990.

Hired as a biologist for the U.S. Fish and Wildlife Service in 1977, Bill conducted research on endangered Peregrine Falcons in Northern California at a time when their continued existence was questionable. His interest in threatened species led to publication by the Audubon Society in 1979 of his paper entitled "Threatened, Declining and Sensitive Bird Species in San Diego County" (Sketches 36:1-2). This paper contained the first published account of the decline of the California Gnatcatcher.

Beyond the Southern California area, Bill has prepared the seabird impacts sections for the Draft and Final Environmental Impact Statements for Hawaii-based Pelagic Fisheries of the Western Tropical Pacific Ocean (2001), received a National Science Foundation major grant to

lead an International Biocomplexity Survey and Expedition to Isla Guadalupe, Baja California, Mexico (2000), led the effort to save North America's most endangered bird species, the San Clemente Loggerhead Shrike (1991-1997). .

Bill holds a U.S. Fish and Wildlife Master Bird Banding Permit (#22378) with Endangered Species Authorization, and California Gnatcatcher Survey Authorization Permit # TE-788036. He received his Masters Degree from the University of San Diego in 1991, and completed a Post-Graduate program at Harvard University in 1997.

Bill served as a member of the Conservation and Research Committee of the Zoological Society of San Diego since the committee was first established. In 1990, he founded the Endangered Species Recovery Council, an international coalition of scientists and conservationists dedicated to finding solutions to the problem of species extinctions. He continues as President of the organization.

In May 2002 Bill was honored in New York as a first recipient of the Explorers Club "Champions of Wildlife" award.