

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.

DRAFT DATE: January 21, 2010

Charles Froehlich, Jr.
655 West Broadway, Suite 1600
San Diego, CA 92101

**DRAFT DECISION OF THE DIRECTOR
Habitat Loss Permit**

APPLICATION NUMBER: HLP XX-XXX, ER 06-08-026

ASSOCIATED PERMIT(S): TM 5494

NAME OF APPLICANT: Charles Froehlich, Jr.

DESCRIPTION/LOCATION OF LOSS:

The project is a major subdivision of 31.3 acres into six residential lots, ranging in size from 4.2 to 6.9 acres. The project will impact 6.0 acres of coastal sage scrub (CSS) of the total 11.4 acres present onsite as shown on the attached Habitat Loss Exhibit. The project includes the grading of six residential pads as well as the construction of driveways and on-site septic systems. There are no off-site improvements proposed as the access to the site has already been constructed under a previous discretionary action.

The project site lies along Double K Road, south of Sierra Rojo Road in the Valley Center Community Planning area within unincorporated San Diego County as indicated on the attached USGS map. The site is currently vacant and includes both native habitat and agricultural uses. Surrounding uses include single-family residences and agricultural uses.

Biological resources on the project site were evaluated in a biology report and resources map prepared RC Biological Consulting (2009). On-site habitat includes southern arroyo willow riparian forest, coast live oak riparian forest, Diegan coastal

sage scrub, granitic southern mixed chaparral, avocado orchards and developed and disturbed lands. Four sensitive wildlife species and no sensitive plant species were identified onsite: orange-throated whiptail, yellow-breasted chat, turkey vulture and red-shouldered hawk. Protocol surveys for the California gnatcatcher were not performed onsite due to their low likelihood to occur onsite based on the site elevation and winter microclimate. Nine biological surveys were performed onsite, 6 of which occurred during the 2008 California gnatcatcher breeding season. During these surveys, no California gnatcatchers were detected.

The proposed project will impact 16.0 acres, as listed in Table 1. Mitigation will occur through the onsite preservation of 1.2 acres of Diegan coastal sage scrub and 2.6 acres of granitic southern mixed chaparral as well as the offsite purchase of 10.8 acres of Diegan coastal sage scrub. 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 off-site mitigation acreages are listed in Table 1. In addition, 4.2 acres of Diegan coastal sage scrub, 2.3 acres of granitic southern mixed chaparral, 1.2 acres of southern arroyo willow riparian forest and 1.5 acres of coast live oak riparian forest will be set aside in on-site biological open space easements, but this area is considered impact neutral because its preservation is required by the Resource Protection Ordinance, and the western open space area is adjacent to agricultural and residential uses. Therefore, all impacts associated with the development of the Froehlich property will be 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.

| Habitats | Existing (acres) | Impact Neutral | Impacts (acres) | Mitigation Ratio | Mitigation Required | On site Mitigation (acres) | Off-site Mitigation (acres) |
|--|------------------|----------------|-----------------|------------------|---------------------|----------------------------|-----------------------------|
| Southern Arroyo Willow Riparian Forest | 1.2 | 1.2 | 0 | 3:1 | 0 | 0 | 0 |
| Coast Live Oak Riparian Forest | 1.5 | 1.5 | 0 | 3:1 | 0 | 0 | 0 |
| Coastal Sage Scrub | 11.4 | 4.2 | 6.0 | 2:1 | 12 | 1.2 | 10.8 |
| Granitic Southern Mixed Chaparral | 4.9 | 2.3 | 0 | 0.5:1 | 0 | 2.6 | 0 |
| Avocado Groves | 9.3 | 1.4 | 7.8 | -- | -- | -- | -- |
| Disturbed | 1.7 | -- | 0.9 | -- | -- | -- | -- |
| Developed | 1.3 | -- | 1.3 | -- | -- | -- | -- |
| Total | 31.3 | 10.6 | 16.0 | | | 3.8 | 10.8 |

**An additional 0.1 acres of Avocado Groves and 0.8 acres of Disturbed habitat are included in the onsite open space but are not counted toward onsite mitigation amounts

DECISION:

The Director of Planning and Land Use 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 Game (CDFG) concur with the Director's approval, by 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 (CDFG, 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 allows for the loss of the above-described coastal sage scrub habitat (see attached Habitat Loss Exhibit) and incidental take of the California gnatcatcher for a period of one calendar year commencing the day concurrence is given by both the USFWS and CDFG. If the loss of habitat, as authorized by this Habitat Loss Permit, has not occurred within this one-year period, this Habitat Loss Permit and the authorization for the loss of coastal sage scrub habitat expires.

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 TM 5494. 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 the approval of any plans, issuance of any permits, and approval of any final map(s), provide evidence to the satisfaction of the Director of Public Works (DPW) that the following "Specific Environmental Items" have been indicated on the grading, and or improvement plans:

1. The grading, and or improvement plans, shall indicate permanent fences along the open space boundary of lots 2 through 6 as shown on the Fence and Sign Exhibit for the Biological Open Space dated **April 30, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026.
 - a. The fence shall be a minimum of four feet (4') high and consist of three strand wire fencing. Any change in construction materials and fence or wall design shall be approved by the Department of Planning and Land Use prior to installation.
2. The grading, and or improvement plans shall indicate open space signs along the open space boundary of lots 2 through 6 as shown on the Fence and Sign Exhibit for the Biological Open Space dated **April 30, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026.
 - a. 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**

Unauthorized Entry is Restricted. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego, Department of Planning and Land Use
Reference: ER 06-08-026”

3. The grading, and or improvement plans, shall indicate Temporary Orange Construction fencing to protect from inadvertent disturbance of all open space easements that do not allow grading, brushing or clearing. The fencing shall be placed along the open space boundary of lots 2 through 6 as shown on the Fence and Sign Exhibit for the Biological Open Space dated **April 30, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026.
- B. Prior to the approval of any plans, issuance of any permit, and approval of any final map(s), provide evidence to the satisfaction of the Director of Public Works (DPW) that the following “Specific Environmental Notes” have been placed on the grading, and or improvement plans:
1. “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 temporary fencing shall be removed after the conclusion of such activity.”

2. “Restrict all brushing, clearing and/or grading such that none will be allowed during the raptor breeding season. This is defined as occurring between January 15 and July 15. The Director of Planning and Land Use may waive this condition, through written concurrence from the US Fish and Wildlife Service and the California Department of Fish and Game, that no raptors are present in the vicinity of the brushing, clearing or grading.”
3. “Prior to the conclusion of grading activities and Final Grading Release, provide evidence to the satisfaction of the Director of Planning and Land Use that the permanent fences and open space signs have been placed along the biological open space boundary of lots 2 through 6 as shown on these plans and the Fence and Sign Exhibit for the Biological Open Space dated **April 30, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026. “
 - a. Evidence shall be site photos and a statement from a California Registered Engineer, or licensed surveyor that the permanent walls or fences, and 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:

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for more information about easement restrictions and
exceptions contact the County of San Diego,
Department of Planning and Land Use
Reference: ER 06-08-026”

- C. Prior to approval of grading and/or improvement plans, and prior to approval of the Final Map, the applicant shall grant to the County of San Diego by separate document, an open space easement as shown on the Tentative Map dated **February 13, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026. 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 sole exceptions 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 Uniform Fire Code and the Memorandum of Understanding dated February 26, 1997, between the wildlife agencies and the fire districts and any subsequent amendments thereto.
 2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of Planning and Land Use or the Director of Public Works.
 3. Vegetation removal or application of chemicals for vector control purposes where expressly required by written order of the Department of Environmental Health of the County of San Diego.
- D. Prior to approval of grading and/or improvement plans, and prior to approval of the Final Map, grant by separate document to the County of San Diego a Limited Building Zone Easement as shown on the Tentative Map dated **February 13, 2009** on file with the Department of Planning and Land Use as Environmental Review Number 06-08-026. The purpose of this easement is to limit the need to clear or modify vegetation for fire protection purposes within the adjacent biological open space easement and prohibits the construction or placement of any structure designed or intended for occupancy by humans or animals. The only exceptions to this prohibition are:
1. Decking, fences, and similar facilities.
 2. Sheds, gazebos, and detached garages, less than 250 square feet in total floor area, that are designed, constructed and placed so that they do not require clearing or fuel modification within the biological open space easement, beyond the clearing/fuel modification required for the primary structures on the property.
- E. Prior to the approval of any plans, issuance of any permit, and approval of any final map(s), provide evidence to the satisfaction of the Director of Planning and Land Use that 10.8 acres of Diegan Coastal Sage Scrub habitat credit has been secured in a mitigation bank approved by the California Department of Fish &

Game, located in North County. Evidence of purchase shall include the following information to be provided by the mitigation bank:

1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.
2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.
3. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by this project and the amount remaining after utilization by this project.

-OR-

Provide for the conservation and habitat management of a minimum of 10.8 acres of Diegan Coastal Sage Scrub habitat located in the North County. A Resource Management Plan (RMP) for the Diegan Coastal Sage Scrub habitat must be submitted and approved by the Director of the Department of Planning and Land Use. The plan shall be prepared and approved pursuant to the County of San Diego Biological Report Format and Requirement Guidelines. An open space easement over the acquired habitat must be dedicated to the County of San Diego prior to or immediately following the approval of the RMP. Alternatively, proof that a federal, state or local government agency with the primary mission of resource management has taken fee title to the land will be accepted in lieu of an easement.

ENVIRONMENTAL FINDINGS:

A. CEQA Findings

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 (CDFG, November 1993):

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

The proposed project will impact 6.0 acres of coastal sage scrub. Approved coastal sage scrub losses as of the date of November 12, 2009 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: | 2,953.30 acres |
| Cumulative loss of Coastal sage scrub to date: | 1,159.82 acres |
| Net loss due to this project: | 6.0 acres |
| Total cumulative loss: | 1,165.82 acres |
| Remaining loss under five percent guideline: | 1,787.48 acres |

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

The coastal sage scrub on-site is of intermediate value as outlined by the flow chart in the NCCP Guidelines. The County habitat evaluation model ranks the site as predominantly agriculture, with a small amount of low ranked habitat in the southwestern and southeastern corners of the project site. The site is located within a rural residential area of Valley Center. Most of the surrounding properties are developed with a combination of single family residential land uses and agricultural uses. The habitat surrounding the site is ranked as agriculture and low by the County habitat evaluation model.

The most valuable biological resource areas on the project site are the wetland areas in the southeastern and southwestern corners of the project site. These areas support southern coast live oak riparian forest and southern arroyo willow riparian forest. These wetlands serve as tributaries to Moosa Canyon Creek which occurs approximately 500-feet south of the project site and serves as a local corridor. Moosa Canyon Creek is mapped as very high value on the habitat evaluation model for the County. The riparian habitat areas on site have connectivity to off-site resources and will be maintained within biological open-space easements. The open space design will ensure that connectivity between valuable habitat areas is maintained.

Therefore, the loss of 6 acres of coastal sage scrub habitat on the Froehlich property will not preclude connectivity between areas of high habitat values. In accordance with the NCCP, these impacts to coastal sage scrub habitat are considered significant, and mitigation will occur through the onsite preservation of coastal sage scrub habitat as well as offsite purchase of no less than 10.8 acre credits of coastal sage scrub within a County approved mitigation bank.

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

Development of this site would not exclude the ability to create a viable preserve in the subarea and subregion. The coastal sage scrub habitat on-site is not identified for conservation on Attachment B of the Process Guidelines. The proposed project would maintain the site's habitat function and values and would preserve the highest value habitat onsite which include two wetlands containing southern arroyo willow riparian forest and coast live oak riparian forest. The proposed open space would include all of the on-site areas mapped as "Natural Upland Habitat within PAMA" and "Riparian/Wetland Habitat and Transition Zone within PAMA" according to the Draft North County MSCP.

No California gnatcatchers were found onsite during nine onsite surveys, six of which occurred during the 2008 California gnatcatcher breeding season. Four sensitive wildlife species and no sensitive plant species were identified onsite: orange-throated whiptail, yellow-breasted chat, turkey vulture and red-shouldered hawk. Development of the site will avoid a significant regional impact to these and other sensitive species through the preservation of onsite habitat as well as the purchase of offsite lands in areas known to support these sensitive species. Based on the above facts, 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.

Approximately 6.0 acres of the 11.4 acres of Diegan coastal sage scrub habitat on the project site will be impacted. The habitat is considered of "intermediate" value, pursuant to the NCCP Logic Flow Chart because the Diegan coastal sage scrub habitat on site is relatively patchy and disturbed and is bordered by agricultural lands and residential development. The project will be required to purchase no less than 10.8 acres of offsite Diegan coastal sage scrub in addition to the preservation of 5.4 acres of Diegan coastal sage scrub habitat onsite. The offsite habitat must be purchased either within a County-approved mitigation bank or a County-approved off-site location. For habitat purchases outside of a formal mitigation bank, a Habitat Management Plan would be required to the satisfaction of the County. The purchase of off-site habitat will provide for the long-term viability of habitat that has connectivity to high value districts. As such, the loss of Diegan coastal sage scrub will be mitigated to the maximum extent practicable for intermediate-value habitat in accordance with Section 4.3 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.

Protocol Least Bell's Vireo surveys were performed in 2008 with negative results. No sensitive plant species were observed or have a high potential to occur onsite. Four sensitive wildlife species, orange-throated whiptail, yellow-breasted chat, turkey vulture and red-shouldered hawk were observed onsite. There will be potential impacts to these sensitive species due to this project, but the site does not contain regionally important populations nor provide significant habitat for these species. During nine onsite surveys, six of which occurred during the 2008 California gnatcatcher breeding season, no California gnatcatchers were observed. Due to the absence of California gnatcatchers during onsite surveys, as well as the elevation of the project site, it is not expected that California gnatcatchers have the potential to occur onsite. Mitigation for the loss of coastal sage scrub habitat due to the project will be required at a 2:1 ratio, including onsite preservation of 1.2 acres and offsite purchase of 10.8 acres of coastal sage scrub habitat. An additional 4.2 acres of coastal sage scrub will be preserved onsite, but considered impact neutral. Offsite habitat purchase will preserve habitat with long-term viability that has connectivity to high value districts and potential to support listed species. Through these mitigation measures, the proposed residential development of the project site will not appreciably reduce the likelihood of the survival and recovery of listed species.

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

The project will require grading plans for site preparation for rural residential development. The issuance of a Habitat Loss Permit by the County of San Diego, with the concurrence of the Department of Fish and Game 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 prior to the clearing of any coastal sage scrub supported on the project site. No state or federal permits are identified as being required at this time. Construction and/or land use modification will not commence until all appropriate permits have been issued. The project has been found to be in conformance with Section 86.104 of the San Diego County Code. 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 Froehlich 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, B, C, D, E

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 of a \$1,993 fee to the California Department of Fish and Game for their review of the Mitigated Negative Declaration (Fish and Game Code §711.4) and a \$50 administrative fee to the County (\$2,043 total). If you made this payment at the time of public review of the environmental document pursuant to Administrative Code Section 362, Article XX, effective August 27, 1992, you have met this obligation. If the fee has not been paid, to comply with State law, the applicant should remit to the County Department of Planning and Land Use, within two (2) working days of the effective date of this approval (the "effective date"

being the end of the appeal period, if applicable). **The payment must be by certified check or cashier's check payable to the "County of San Diego" and can be submitted to the cashier at the DPLU office or directly to the County Clerk.** The fees (excluding the administrative fee) may be waived for projects that are found by the Department of Planning and Land Use and the California Department of Fish and Game to have a no effect impact on fish and wildlife resources. Failure to remit the required fee in full within the time specified above will result in County notification to the State that a fee was required but not paid, and could result in State imposed penalties and recovery under the provisions of the Revenue and Taxation Code. In addition, Section 21089(b) of the Public Resources Code, and Section 711.4(c) of the Fish and Game Code, provide that no project shall be operative, vested, or final until the required filing fee is paid.

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, Department of Planning and Land Use, 5201 Ruffin Road, Suite B, San Diego, California 92123.

The foregoing decision was approved by the Director of Planning and Land Use on date of decision. A copy of this decision, and the documentation supporting the decision, is on file in the Department of Planning and Land Use offices at 5201 Ruffin Road, Suite B, San Diego, California.

DEPARTMENT OF PLANNING AND LAND USE
ERIC GIBSON, DIRECTOR

BY:

JASON GIFFEN, Chief
Project Planning Division

EG:JG:ag

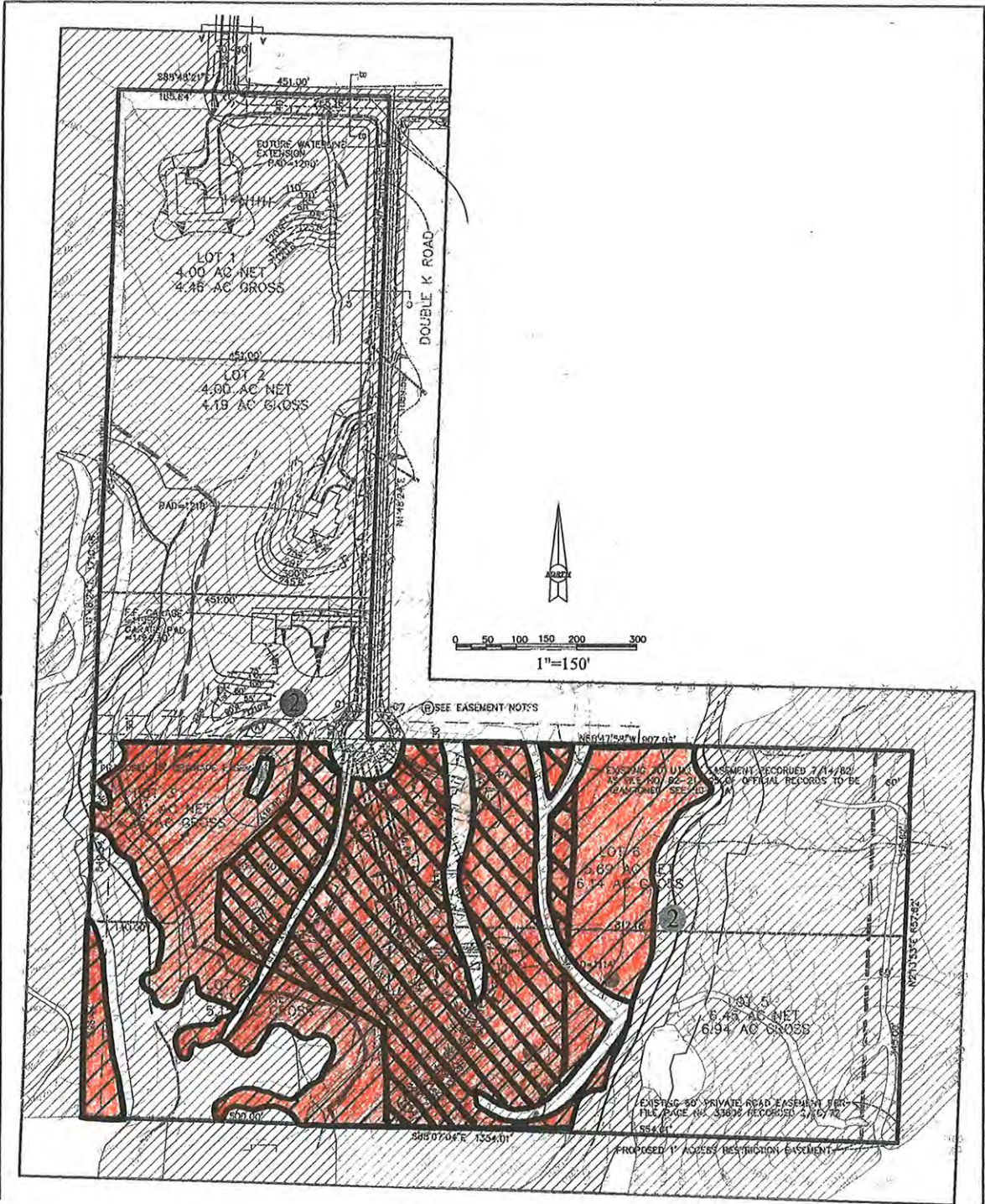
Attachments

Habitat Loss Exhibit dated December 10, 2009

USGS Map

Biological Resources Letter Report, RC Biological Consulting, November 2009

cc: To be provided at issuance of Habitat Loss Permit



Diegan Coastal Sage Scrub



Impacted Diegan Coastal Sage Scrub

Habitat Loss Exhibit

Froehlich; TM 5494; ER 06-08-026

Ashley Gungle

Ashley Gungle, Staff Biologist, DPLU
December 10, 2009