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## **BIOLOGY SUMMARY REPORT**

Biological Resources, Project Impacts, and Proposed Mitigation

<u>The Secret Hills Ranch Grading Permit Project</u>

APN 520-060-18
Project Number: PDS2020-LDGRMJ-30253
Project Proponent: Stanley and Betty Boney
PO Box 428
Crystal Bay, NV 89402

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#### Summary

The Secret Hills Ranch Grading Permit Project consists of an application to grade and construct a single-family residence with accessory structures and related improvements on a portion of an approximately 76.9-acre parcel. The property supports nearly 100% Granitic Southern Mixed Chaparral (SMC) with small areas of Disturbed Habitat (DH) at the periphery. Large areas of the SMC have been disturbed on an ongoing basis since 2005 with the most recent brushing by CalFire in cooperation with local fire authorities in January/February of 2019. Grading to construct a residential pad and related infrastructure will result in direct impacts to SMC and DH along with the various resident plants and animals associated with the development area, potentially including five known sensitive species. Habitat-based mitigation is required to offset project impacts. Mitigation shall consist of onsite open space preservation. An avian nesting survey and/or seasonal restrictions on site development are also recommended to ensure project consistency with the Migratory Bird Treaty Act and the California Fish and Game Code.

#### Introduction, Project Description, Location, and Setting

The Secret Hills Ranch Grading Permit Project is an application for a County of San Diego Grading Permit that would allow grading associated with the construction of a single-family home, two farm employee houses, a barn and stables, and related improvements near the northeast corner of APN 520-060-18. The ownership totals approximately 76.9 gross acres, with a development area in the northeast corner totaling approximately 21 acres (18.8 acres onsite and 2.2 acre offsite for access). The actual area subject to direct grading totals 11.52 acres. The site currently supports brushed and unbrushed native

chaparral vegetation along with small disturbed areas supporting weeds, bare dirt, non-native trees, and occasional native shrubs at the periphery. Offsite impacts are anticipated for the project. These consist of grading and construction of an access driveway from the existing cul-de-sac off Via Tesoro, a private road, located offsite to the northwest. Elevations on the property range between approximately 1,880 feet and 2,075 feet MSL. The soil-types found onsite consist of: Cieneba-Fallbrook rocky sandy loams (CnG2), 30 to 65 percent slopes, eroded; Fallbrook sandy loam, 9 to 15 percent slopes, eroded Fallbrook sandy loam, 9 to 15 percent slopes, eroded (FaD2); and Fallbrook rocky sandy loam (FeE), 9 to 30 percent slopes. These soil types are not known to support rare or endangered edaphic plant species.

The project site is located in the community of Rancho Palo Verde in Alpine, California within the boundary of the Multiple Species Conservation Program Southern Subregional Planning Area. It is further located in the Metro-Lakeside-Jamul segment of the County of San Diego's Subarea (MSCP) Planning Area. As such, it is subject to the requirements of the County's Biological Mitigation Ordinance (BMO), which restricts land conversion and establishes specific mitigation requirements associate with habitat and species impacts. It is also subject to the County's Resource Protection Ordinance (RPO), which protects environmentally-sensitive areas, including wetlands.

#### Methods

The authors (Vincent Scheidt and Brandon Myers) conducted a field survey of the Secret Hills Ranch property on August 10, 2020 between 08:00-12:00. Weather conditions during the survey included temperatures in the high 60°s to low 80°s, clear skies, and a light westerly breeze.

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

#### Results - Vegetation Communities, Flora/Fauna, and Special Status Species

The Secret Hills Ranch Grading Permit Project site supports two generally discrete plant associations or habitats. These are: Granitic Southern Mixed Chaparral (brushed and unbrushed) and Disturbed Habitat (Figures 3 and 4). Each of these habitats are assigned an MSCP "tier" ranking based on the County's BMO.

#### **Vegetation Communities**

#### Granitic Southern Mixed Chaparral (Holland Code 37121) - Tier III - 72.4 acres

The Granitic form of Southern Mixed Chaparral (SMC) covers the vast majority of the site. This dense, woody vegetation is indicated by Chamise (*Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), hybrid Scrub Oaks (*Quercus x acutiden, Q. x grandidentata*), and a diversity of others. The chaparral components vary to a degree depending on slope and aspect, with some areas being dominated by Eastwood and Big Berry Manzanita (*Arctostaphylos glandulosa, A. glauca*), hybrid Scrub Oaks, Chamise, and Cupped Leaf Ceanothus and Woollyleaf Ceanothus (*Ceanothus perplexans, C. tomentosus*). Patches of California Sagebrush (*Artemisia californica*) with occasional California Buckwheat (*Eriogonum fasciculatum*) shrubs can be found in rocky openings but these are too small and infused with chaparral indicators to qualify as a discrete habitat type. A large, mostly flat area of the SMC has been brushed on an ongoing basis by CalFire for many years, with the most recent brushing in January and February of 2019. In this process, the surface vegetation is mowed, but the stumps always resprout vigorously as in a post-burn situation. The climax community in this brushed area would consist of closed canopy SMC if left undisturbed for a few years. SMC, an MSCP Tier III habitat, is considered a sensitive biological resource in San Diego County, as defined by the County's Guidelines for Determining Significance

#### <u>Disturbed Habitat - Tier IV (Holland Code 11300) - 4.5 acres</u>

Disturbed Habitat (DH) is found along the eastern and northwestern edges of the property where adjoining residences have stripped the area to bare dirt and weeds. This is a result of offsite fire clearing by these adjacent neighbors. Disturbed Habitat, an MSCP Tier IV habitat, is not considered a sensitive resource in San Diego County, as defined by the County's Guidelines for Determining Significance.

#### Flora and Fauna

Eighty-three species of vascular plants and twenty-one species of vertebrate animals were detected on the Secret Hills Ranch Project site during the field survey. The species observed typify the diversity normally found on undeveloped properties in interior foothills areas of San Diego County. A complete list of the plants and animals observed, listed alphabetically, can be found in Table 1, attached. This list would be expected to represent at least 80 percent of the naturalized plants occurring on this property. However, many animals are cryptic, seasonal, or nocturnal. At least dozens of species of animals are expected to use the site, at least on an occasional basis, and it is clear that some seasonal and ephemeral plants could have been missed due to the season of the survey.

#### **Special Status Species**

One special status or "sensitive" plant species was observed on property during the field survey. This was San Diego County Viguiera (*Bahiopsis laciniata*), also known as *Viguiera laciniata*. Sensitive plants are those listed as "Rare", "Endangered", "Threatened", "of Special Concern", or otherwise considered noteworthy by the County of San Diego, the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and/or the California Native Plant Society.

#### San Diego County Viguiera (Bahiopsis [Viguiera] laciniate)

Listing: California Rare Plant Rank, List 4.3

County status: San Diego County Sensitive Plant List, Group D (PDS, 2011)

Federal/State status: none

**Distribution:** This distinctive species occurs from about Mission Valley in central San Diego County south to adjacent areas in northern Baja California along the coast and in foothill areas. Reported localities in San Diego County include Mission Valley, La Mesa, El Cajon, Portrero, Dehesa, Otay, and Tecate. Many populations are threatened by development, although it remains common where it occurs. Also found in Orange County and in other areas where it has been introduced through hydroseeding.

**Habitat:** Occurs in coastal sage scrub, maritime scrub, and xeric chaparral, occasionally as a co-dominant.

**Status on Site:** A single specimen was observed onsite growing in an old vehicle track. This probably represents a waif that was introduced on a piece of heavy equipment.

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

Four sensitive animals were detected on the subject property during the field survey. These are Belding's Orange-Throated Whiptail (*Apiocerids hyperythrus beldingi*), San Diego Horned Lizard (*Phrynosoma blainville*), Southern Mule Deer (*Odocoileus hemionus fuliginatus*), and Turkey Vulture (*Cathartes aura*). Sensitive animals are those listed as "Rare", "Endangered", "Threatened", "of Special Concern" or otherwise considered noteworthy by the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the County of San Diego.

#### Orange-throated Whiptail (Cnemidophorus hyperythrus beldingi)

Listing: County status: San Diego County Sensitive Animal List, Group 2 (PDS, 2011)

State status: "Species of Special Concern" (CDFG, 2008)

Federal status: Former Federal Endangered Species Candidate, C2 (USFWS, 1996)

**Distribution:** Restricted to extreme southwestern California, where it ranges from Orange and Riverside Counties south into northern Baja California.

**Habitat(s):** Inhabits coastal sage scrub, chaparral and areas of open brush with loose soils. May also be found in open, dry riparian areas. Occurs from sea level to about 1,800 feet MSL, occasionally higher on hot, south-facing slopes. Occurs in a variety of open habitats, such as coastal scrub, open chaparral, and xeric riparian areas. Primary requirements include the presence of termites, open areas for foraging and thermoregulation, and friable soils.

**Status on Site:** Two specimens were observed onsite moving about in the southern portion of the property. This species is probably well-distributed in open areas.

#### San Diego Horned Lizard (Phrynosoma blainvillei)

Listing: County status: San Diego County Sensitive Animals List, Group 2 (PDS, 2011)

State status: "Species of Special Concern" (CDFG, 2008)

Federal status: none

**Distribution**: Ventura County south into northern Baja California Norte. Specimens found from sea level to mountain elevations and down desert slopes to the edge of the low desert.

Habitat(s): Open sage scrub, grassland, forested areas and chaparral.

**Status on Site**: A single mature specimen was observed onsite in the proposed development area. This cryptic species is probably relatively common onsite, and relatively common in the vicinity of this property.

#### Southern Mule Deer (Odocoileus hemionus fuliginatus)

Listing: County status: San Diego County Sensitive Animal List, Group 2 (PDS, 2011)

"MSCP Indicator" (PDS, 2011)

State status: Regulated Game Animal (CDFG, 2003)

Federal status: none

**Distribution**: Found over much of western North America, from Mexico to southern Canada. Fairly common in San Diego County foothill areas, although persisting in some coastal localities (e.g.: Torrey Pines)

**Habitat(s)**: Woodlands, chaparral, sage scrub, grasslands. Usually indicated by distinctive scats, occasionally by sightings of specimens themselves.

**Status on Site**: Single specimen observed on the southern end of the property. Scats and tracks well distributed observed in various areas.

#### Turkey Vulture (Cathartes aura)

Listing: "Blue-list" (Tate, 1986)

"Declining" (Unitt, 1984)

County status: San Diego County Sensitive Animal List, Group 1 (PDS, 2011)

Federal/State status: none

**Distribution**: Ranges from southern Canada to Argentina

**Habitat(s)**: Open areas, farmlands, grasslands. Usually seen soaring overhead or sometimes perched on poles, dead trees, or on the ground.

Status on Site: Two adult specimens observed soaring over the property during the

field surveys. No evident nesting habitat on the property.

Sensitive animals known from the vicinity, along with an assessment of the probability of occurrence onsite and basis for factual determination, are presented in Table 3.

#### **Habitat Evaluations for Special Status Species**

Direct habitat evaluations (site assessments) for certain rare and endangered species, including California Gnatcatcher, Quino Checkerspot Butterfly, Hermes Copper Butterfly, and San Diego Thorn-mint, were conducted as part of the site survey work. These evaluations examined various site characteristics, including habitat elements that might support these rare species.

<u>California Gnatcatcher</u>: California Gnatcatcher is a small, non-migratory songbird that occurs in association with coastal scrub plant associations. The project site does not support any coastal scrub, and California Gnatcatchers are not known to occur in the vicinity, although they do occur several miles to the west at lower elevations in Diegan coastal sage scrub. Gnatcatchers could theoretically disperse to this property, although the habitat is not capable of supporting resident pairs or any reproduction. Based on the nature of the chaparral on the subject site, the likelihood of California Gnatcatcher occurring here is considered very low.

Quino Checkerspot Butterfly: Quino Checkerspot Butterfly is a very rare species associated with a diversity of habitat types, including open scrubs, chaparral, and herbaceous grasslands, typically with natural openings in the vegetation. At maturity, the chaparral on the subject site is closed canopy and extremely dense, with openings only associated with small rock outcrops. The site was searched for larval host plants (such as *Plantago erecta* and others) and nectar plants species. The only larval host plant species observed onsite was *Cordylanthus rigidus*, which was observed in association with rock outcrops in small numbers. Quino Checkerspot is known from Wright's Field to the north of the site, although the habitat there is very different from that found on this site, with open grasslands supporting an abundance of larval host plants.

The US Fish and Wildlife Service (USFWS) has provided survey guidelines, including recommendations regarding areas to be surveyed. The first step in this process is a site assessment used to determine if a project site contains areas where surveying for Quino is recommended. If a site does not contain such areas, (i.e., is comprised solely of "excluded" areas), surveys would not be recommended. Excluded Areas not recommended for Quino surveys include; orchards, developed areas, or small in-fill parcels largely dominated by non-native vegetation; areas of active/in-use agriculture without natural or remnant inclusions of native vegetation or that are completely without any fallowed or unplowed areas, and; closed-canopy woody vegetation including forests, riparian areas, shrub-lands, and chaparral. "Closed-canopy woody vegetation" describes shrubs or trees growing closely together in which the upper portions of the vegetation converge (are touching) to the point that the open space between two or more plants is not significantly different than the open space within a single plant. Closed canopy shrubland and chaparral are defined as vegetation so thick that it is inaccessible to humans except by destruction of woody vegetation (branches). As described previously, the SMC on the subject site is closed canopy and matches the description of inaccessibility to humans except by destruction of woody vegetation. Cleared areas of the SMC are temporarily open, but the regrowth of the vegetation is rapid and extremely dense, matching the state of the mature vegetation. Based on the density and closed canopy of the chaparral on the subject site and the lack of larval host plants, the likelihood of Quino Checkerspot Butterfly occurring here is considered low, and the area is considered "excluded".

<u>Hermes Copper Butterfly</u>: Hermes Copper Butterfly is a rare narrow endemic species that is completely dependent on mature patches of *Rhamnus crocea* as its only known larval host plant. *R. crocea* can be relatively abundant in coastal sage scrub and chaparral habitats, including in many areas where Hermes are not found. Hermes Copper Butterflies occur in colonies where the host plants along with specific nectar plants (primarily *Eriogonum fasciculatum*) are intermixed or growing in relatively close proximity to each other (within 10 feet).

The County of San Diego has provided Guidelines for Hermes Copper surveying for project sites with both the butterfly's larval host plant, *R. crocea*, and the preferred primary adult nectaring plant, *E. fasciculatum*, occurring on or near the site. Hermes Copper is dependent on patches of spiny redberry. In Hermes Copper habitat, the *E. fasciculatum* is generally within 10 feet (approximately three meters) of the spiny redberry.

The project site supports both *R. crocea* and *E. fasciculatum*, but the former occurs in very low numbers with only a handful of very widely spaced specimens – it is relatively rare onsite and does not occur in patches. *E fasciculatum* is generally restricted to small groupings not in proximity to *R. crocea*. Neither *R. crocea* nor *E. fasciculatum* are found in any significant numbers in the proposed development area of the property, in any case. Based on the growth configuration the chaparral and paucity of indicators on the subject site, the likelihood of Hermes Copper Butterfly occurring here is considered low.

<u>San Diego Thorn-mint</u>: is a very distinctive, annual forb which occurs in heavy clay soils, usually in pockets within Las Posas or San Miguel-Exchequer series soils. This small plant is readily detected during the appropriate time of year when it is present. The subject property does not support any viable heavy clay habitat or soils for this species, and no signs of this rare herb were seen during the survey. The likelihood of San Diego Thorn-mint occurring here is considered very low.

#### Jurisdictional Wetlands and Waterways

Upland swales run along the west and southwest portion of the Secret Hills Ranch site in a generally northeast to southwest direction. These are all ephemeral and appear to be the product of surface drainage from the surrounding area with no significant drainage basin source. These swales are not considered federal wetlands or jurisdictional "waters", and they are not considered County Wetlands. No RPO wetlands occur onsite. Portions of these drainages may qualify as state wetlands/waters as defined by the California Department of Fish and Wildlife.

The project avoids all drainage swales by design and no direct or indirect impacts are anticipated.

Definitions of Federal, State and County wetlands are listed below.

#### Federal Wetlands

The federal regulations that implement Section 404 of the CWA, which was enacted in 1972, define "wetlands" as follows:

"Those areas that are inundated or saturated by surface or ground water (hydrology) at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation (hydrophytes) typically adapted for life in saturated soil conditions (hydric soils). Wetlands generally include swamps, marshes, bogs, and similar areas." (40 CFR 232.2(r).

Federal jurisdictional wetlands that are regulated by the USACE under Section 404 of the CWA must exhibit <u>all three</u> of the above characteristics: hydrology, hydrophytes, and hydric soils (USACE, 1987). Areas that may function as wetlands ecologically, but exhibit one or two of the three characteristics, do not currently qualify as federal wetlands under Section 404.

The USACE also regulates the discharge of dredge and/or fill material into "waters of the United States". The term "waters of the United States" is defined by Corps regulations at 33 CFR Part 328.3 9(a) as:

- 1) All waters that are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- 2) All interstate waters including interstate wetlands;
- 3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
- (i) which are or could be used by interstate or foreign travelers for recreational or other purposes; or
- (ii) from which fish or shellfish are or could be taken and sold in interstate or commerce; or
- (iii) which are used or could be used for industrial purpose by industries in interstate commerce;
- 4) All impoundments of waters otherwise defined as waters of the United States under the definition;
- 5) Tributaries of waters identified in paragraphs (a)(1)-(4) of this section;
- 6) *The territorial seas;*
- 7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1)-(6) of this section.

"Waters of the United States" are sometimes referred to as "waters of the US", "non-wetland waters", or simply as federal "waters".

The USACE also takes jurisdiction in non-tidal waters when wetlands are not present according to the ordinary high-water mark (OHWM). This is defined as:

"...that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

#### State Wetlands

According to the definition used by the CDFW, wetlands are "lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is covered by shallow water" and they exist where <u>any one</u> of the following conditions are present:

- A) Predominantly undrained hydric soils (soils with low concentrations of oxygen in the upper layers during the growing season):
- B) A predominance, at least periodically, of hydrophytic plants (plants that have adapted to the low availability of oxygen and others stresses in saturated soils):
- C) A nonsoil substrate (such as a rocky shore) that is saturated with water or covered by shallow water each year at some point during the growing season.

California's version of CWA is the Porter-Cologne Act, which established the California Water Resources Control Board and various Regional Water Quality Control Boards (RWQCB) to oversee use and protection of the "waters of the state". In California, all surface waters as well as groundwater are considered "waters of the state".

#### County of San Diego Wetlands

The County of San Diego RPO wetland regulations (San Diego County Code Title 8. Division 6. Chapter 6. 86.602 (q)) define "wetlands" as follows:

- (1) Lands having one or more of the following attributes are "wetlands":
  - (aa) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);
  - (bb) The substratum is predominantly undrained hydric soil; or
  - (cc) An ephemeral or perennial stream is present whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system."
- (2) Notwithstanding paragraph (1) above, the following shall not be considered "Wetlands":
  - (aa) Lands which have attribute(s) specified in paragraph (1) solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:
    - (i) Have negligible biological function or value as wetlands;
    - (ii) Are small and geographically isolated from other wetland systems;
    - (iii) Are not Vernal Pools; and,
    - (iv) Do not have substantial or locally important populations of wetland dependent sensitive species.
  - (bb) Lands that have been degraded by past legal land disturbance activities, to the point that they meet the following criteria as determined by the Director of Planning and Land Use:
    - (i) Have negligible biological function or value as wetlands even if restored to the extent feasible; and,
    - (ii) Do not have substantial or locally important populations of wetland dependent sensitive species.

#### Other Unique Features/Resources

Because of the project site's general homogeneity, it lacks unique features or resources that would enhance its biological significance. There are numerous small rock outcrops onsite, but these are common in Alpine area. The property could be considered part of local habitat linkage/corridor, particularly towards the south where it adjoins vast open areas. However, the proposed development area adjoins areas of existing residential development, thus diminishing this portion of the site's value as a potential corridor to a significant degree.

The property qualifies as a Biological Resource Core Area (BRCA) under the County of San Diego's Biological Mitigation Ordinance (BMO) pursuant to SEC. 86.506(a)(1)(a. It is located at the edge of a very large block of native vegetation that contains biological resources that support or contribute to the long-term survival of sensitive species and the area does support sensitive species. The project site is not mapped as a part of the Wildlife Agencies' Pre-Approved Mitigation Area (PAMA), however.

#### Project NCCP and BMO Compatibility

The conversion of natural habitats in the unincorporated County of San Diego is currently regulated through its Subarea Planning efforts in compliance with the Natural Communities Conservation Program

(NCCP) process. The intent of these efforts is to retain large blocks of native habitats in order to preserve habitat values and reduce the endangerment of "covered" species through the retention of essential biotic variability and long-term habitat viability.

#### Project Compliance with the Biological Mitigation Ordinance

The Secret Hills Ranch Project complies with the requirements of the Subregional Multiple Species Conservation Program (MSCP) and the County of San Diego's "South County" MSCP Subarea Plan. The project also complies with the requirements of the County of San Diego's BMO and the County's interpretation of the California Environmental Quality Act (CEQA). The MSCP and the BMO require certain preserve design elements, the avoidance of certain sensitive plant species, and application of specific mitigation ratios. These are detailed subsequently in the impact and mitigation sections of this report.

#### Significance of Project Impacts and Proposed Mitigation

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

#### Direct, Indirect, and Cumulative Impacts

Anticipated impacts to habitats were calculated by determining the acreage of each habitat-type affected by site development, including onsite and offsite improvements and fire clearing from all habitable structures.

Measurable direct and indirect impacts would result from the development of Secret Hills Ranch project site. Direct impacts result from the actual removal of habitat, plants, and animals from the site through grading and brushing clearing or thinning for fire protection purposes, etc. These direct impacts are considered permanent, because they result in a conversion of habitats to landscaped areas, structures, parks, roads, etc. Indirect impacts also affect habitats, plants, and/or animals residing on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects".

#### **Direct Impacts**

Development as proposed could result in the following direct impacts (summarized in Table 2):

- (1) Up to 18.8 acres of SMC could be impacted as a result of site development. This impact is considered **significant**, as defined by CEQA.
- (2) Up to 2.2 acres of DH will be impacted as a result of site development. This impact is considered **less than significant**, as defined by CEQA.
- (3) The resident specimen of at least one sensitive plant species occurring onsite. This is San Diego County Viguiera. This loss is considered **significant**, as defined by CEQA.
- (4) Resident specimens of at least four sensitive animal species occurring onsite. These are Belding's Orange-Throated Whiptail, San Diego Horned Lizard, Southern Mule Deer, and Turkey Vulture. This loss is considered **significant**, as defined by CEQA.

#### **Indirect Impacts**

Some indirect impacts resulting from changes in land use are anticipated. These are primarily "edge effects" impacting natural areas onsite and adjoining offsite areas. Because the development area is already impacted by edge effects from adjacent residential development, these indirect impacts are considered **less than significant**. No specific mitigation is required for indirect impacts.

#### <u>Cumulative Impacts</u>

Cumulative impacts refer to the combined environmental effects of the proposed Project and other past, present, and probable future projects. In some cases, the impact from a single project may not be significant, but when combined with other projects, the cumulative impact may be significant.

The Secret Hills Ranch project will contribute to the cumulative loss of SMC vegetation. Project-related construction, grading, clearing, or other activities will permanently remove sensitive native or naturalized habitat on the project site. That is, the project will directly impact 18.8 acres of SMC habitat. This vegetation-type is very well distributed in San Diego County, although SMC is considered a sensitive habitat. Therefore, the relatively minor impacts to this vegetation-types (from a regional perspective), although adverse and significant, are not "cumulatively considerable" when viewed in connection with the substantial acreages of chaparral vegetation remaining in the San Diego County region. Also, due to the extent of these habitats onsite and the fact that all impacts the SMC habitat will be mitigated to a level that is below significance, approval of the Secret Hills Ranch project will not have cumulatively considerable impacts when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource.

Below is a list of past, present, and future projects and the significance of the cumulative impacts analyzed. This was compiled by County staff by determining a suitable study area around the proposed project and locating projects within that study area. More details about these projects can be found by using these links:

Accela Citizen Access: https://publicservices.sandiegocounty.gov/CitizenAccess/Default.aspx PDS Document Library: https://www.sandiegocounty.gov/content/sdc/pds/doclibrary.html

Projects within 1 mile	County Records of Habitat or Species Impacts:
PDS2013-TPM-21210	Site fully developed, no native vegetation, no SMC impacts
PDS2006-3910-0614034	TPM, no native vegetation, no SMC impacts
PDS2009-3910-8515001B	MUP modification, no SMC impacts
PDS2009-3301-85-001-02	MUP, no SMC impacts
PDS2012-MUP-86-021M3	MUP Minor Deviation, no SMC impacts
PDS2005-3001-00-057-01	NOE, Categorical Exemption, no native vegetation, no SMC impacts
PDS2012-3800-12-004	GPA for the FCI Lands, no native vegetation, no SMC impacts
PDS2012-3000-12-037	Admin Permit for guest housing, no native vegetation, no SMC impacts

None of these projects impact SMC, and most are ministerial, not involving any native vegetation. None contribute to the loss of SMC in the region.

#### **Proposed Mitigation**

In order to reduce project all impacts to "less than significant", the following mitigation measures are recommended:

1. A loss of up to 18.8 acres SMC (Tier III) is considered "significant" and requires mitigation at a ratio of 1:1 per the requirements of the BMO. This means that a minimum of 18.8 acres of Tier III or a higher Tier habitat is required to mitigate for impacts to SMC. Onsite mitigation for this impact should take place at the southwestern portion of the property in a biological open space easement containing of 34.5 acres of native vegetation (Figures 4). The onsite open space easement will also provide avoidance and protection of the onsite drainages which will ensure protection of water quality in all downslope areas. This area supports the highest value habitat and the largest numbers of the site's resident sensitive species. A proposed Limited Building Zone (LBZ) easement extends 100 feet from the limits of the proposed onsite open space easement (Figure 4). The onsite biological open space easement will require some form of permanent delineation – either fencing and/or signage, as shown in Figure 5. Temporary fencing will also be required along all open space boundaries where clearing or grading is proposed within 100 feet of on- or off-site preserved habitat where permanent fencing has not yet been constructed.

- 2. A loss of 2.2 acre of DH is considered "less than significant" and does not require mitigation.
- 3. No specific mitigation for impacts to sensitive species is required. As promoted by California's NCCP Act, the loss of these sensitive species will presumably be compensated for by the conservation of onsite habitat that theoretically supports such species (habitat-based mitigation). No species-based mitigation is required. Specifically, impacts to the List D and Group II species will utilize this habitat-based mitigation. The impact to the Group I species will utilize species-based mitigation, which will be accomplished through the preservation of habitat.
- 4. Site brushing, grading, and/or the removal of native vegetation within 300 feet of any potential migratory songbird or 500 feet of any potential raptor nesting habitat should not take place during the spring/summer songbird breeding season, defined as from 1 February to 31 August of each year. This is recommended in order to ensure compliance with the federal Migratory Bird Treaty Act and Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prevents the "take" of eggs, nests, feathers, or other parts of most native bird species, and the Endangered Species Act. Limiting brushing and grading to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors. Should it be necessary to conduct brushing, grading, or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas within 500 feet of the proposed activity will be required. The results of the survey will be provided in a report to the Director; Planning and Development Services and the Wildlife Agencies (California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) for concurrence with the conclusions and recommendations.

No other biological mitigation associated with the Secret Hills Ranch Grading Permit Project is recommended at this time.

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### Preparer and Persons/Organizations Contacted

Vincent Scheidt Certified Biological Consultant

> Brandon Myers Associate Biologist

#### **Attachments**

- Table 1. Plants and Animals Observed
- Table 2. Habitat Impacts/Mitigation Analysis
- Table 3. Sensitive Species Known from the Vicinity
- Figure 1. Regional Location
- Figure 2. Recent Aerial Photograph
- Figure 3. Onsite Soils Map
- Figure 4. Onsite and Offsite Biological Resources, Fencing/Signage, and Proposed Open Space on Aerial Photograph
- Figure 5. Onsite and Offsite Biological Resources on Preliminary Grading Plan

#### Table 1. Plants and Animals Observed - Secret Hills Ranch

#### Scientific Name Common Name

#### Plants

Acacia sp. \*WattlesAcmispon glaberDeerweedAcourtia microcephalaSacapelloteAdenostoma fasciculatumChamise

Allophyllum glutinosum Sticky False Gilia

Arctostaphylos glandulosaEastwood's ManzanitaArctostaphylos glaucaBig Berry ManzanitaArtemisia californicaCalifornia Sagebrush

Baccharis sarothroides Desert Broom

Bahiopsis laciniata San Diego County Viguiera

Bromus diandrus \* Ripgut Brome
Bromus rubens \* Red Brome

Calochortus weedii Weed's Mariposa Lily
Calystegia macrostegia Coast Morning Glory

Camissoniopsis sp. Suncups

Carex triquetra sp. Trigonous Sedge

Ceanothus perplexansCupped Leaf CeanothusCeanothus tomentosusWoollyleaf CeanothusCentaurea melitensisMaltese Star-Thistle

Chlorogalum parviflorumSmall-Flowered SoaprootChorizanthe fimbriataFringed SpineflowerCistus creticus \*Hoary Rock-Rose

Cordylanthus rigidus Stiffbranch Bird's Beak

Crocanthemum scopariumPeak RushroseCroton setigerTurkey Mullein

Cryptantha sp. Catseyes

Cuscuta californica California Dodder
Datura wrightii Sacred Datura

Dimorphotheca fruticose \*Trailing African DaisyDiplacus x australisSan Diego Monkeyflower

Dittrichia graveolens \* Stinkwort

Eriastrum filifolium Lavender Woollystar

Erigeron canadensis Horseweed
Erigeron foliosus Leafy Fleabane

Eriogonum fasciculatum California Buckwheat

#### Table 1. Plants and Animals Observed - Secret Hills Ranch

Scientific Name Common Name

Eriophyllum confertiflorum Golden Yarrow

Euphorbia polycarpa Smallseed Sandmat

Galium angustifolium Narrow-Leaved Bedstraw

Galium nuttallii San Diego Bedstraw

Gastridium ventricosum Nit Grass

Gutierrezia sarothrae Broom Snakeweed

Hazardia squarrosa Saw-Toothed Goldenbush

Helianthus gracilentus

Hesperoyucca whipplei

Chaparral Yucca

Heterotheca grandiflora

Telegraphweed

Hirschfeldia incana \*

Shortpod Mustard

Hypochaeris glabra \*

Lactuca serriola \*

Prickly Lettuce

Lepidium sp. Peppergrasses
Limonium sinuatum \* Blue Statice

Logfia filaginoides California Cottonrose
Logfia gallica \* Narrowleaf Cottonrose

Malacothamnus densiflorus Many-Flowered Bush-Mallow

Malosma laurina Laurel Sumac

Myriopteris clevelandii Clevelandis Lipfern

Navarretia hamata Hooked Pincushionplant

Nuttallanthus texanus Blue Toadflax

Olea europaea \* Olive

Opuntia sp. \* Prickly Pear

Pellaea mucronata Bird's Foot Cliffbrake
Prosopis glandulosa \* Honey Mesquite

Pseudognaphalium biolettii Two-Color Rabbit Tobacco

Pseudognaphalium californicumCalifornia CudweedPseudognaphalium luteoalbum \*Jersey CudweedPseudognaphalium microcephalumFeltleaf Everlasting

Quercus x acutidens Torrey's Hybrid Oak

Quercus x grandidentata Engelmann X Scrub Oak Hybrid

Rhamnus crocea Redberry Buckthorn
Rhamnus pilosa Hairyleaf Redberry

Rhus ovata Sugar Bush

Sairocarpus pusillus Lesser Snapdragon

#### Table 1. Plants and Animals Observed - Secret Hills Ranch

Scientific Name Common Name

Salvia apiana White Sage

Salvia columbariae Chia

Selaginella bigelovii Bigelow's Spike Moss
Silene laciniata Cardinal Catchfly

Stephanomeria diegensis
San Diego Wirelettuce
Stipa coronata
Crested Needle Grass
Stylocline gnaphaloides
Everlasting Neststraw
Toxicodendron diversilobum
Pacific Poison Oak
Vulpia myuros \*
Rat's-Tail Fescue
Xylococcus bicolor
Mission Manzanita
Yucca schidigera
Mojave Yucca

Zeltnera venusta California Centaury

#### Birds

Aphelocoma californica California Scrub Jay

Cathartes auraTurkey VultureSpinus psaltriaLesser GoldfinchSayornis phoebeEastern PhoebeZenaida macrouraMourning doveCallipepla californicaCalifornia Quail

Calypte annaAnna's HummingbirdMelozone crissalisCalifornia TowheePipilo maculatusSpotted Towhee

Polioptila caeruleaBlue-gray GnatcatcherPsaltriparus minimusAmerican BushtitSayornis sayaSay's Phoebe

#### Mammals

Canis latrans Coyote
Lynx rufus Bobcat

Neotoma bryantiBryant's WoodratNeotoma macrotisBig-Eared WoodratOdocoileus hemionus fuliginatusSouthern Mule Deer

Sylvilagus bachmani Brush Rabbit

Thomomys bottae Botta's Pocket Gopher

Table 1. Plants and Animals Observed - Secret Hills Ranch

Scientific Name	Common Name
Reptiles	
Aspidoscelis hyperythrus beldingi	Belding's Orange-Throated Whiptail
Phrynosoma blainvillei	San Diego Horned Lizard

Total: 83 species of native and naturalized plants and 21 species of native vertebrates detected \* = non-native species **bold = Special Status Species** 

Table 2. Habitat Impact/Mitigation Analysis - the Secret Hills Ranch Project

Vegetation Community / MSCP Tier	Total Acres Onsite and Offsite <sup>1</sup>	Acres Potentially Impacted; Onsite and Offsite	Impacted Acres Requiring Mitigation	Onsite Mitigation Provided
Granitic Southern Mixed Chaparral / MSCP Tier III	72.4 acres + 0.0 aces offsite	18.8 acres	18.8 acres @ 1:1 ratio	34.5 acres
Disturbed Habitat / MSCP Tier IV	4.5 acres + 0.2 aces offsite	2.2 acres	none	
TOTALS	76.9 acres + 0.2 aces offsite	21.0 acres	18.8 acres	34.5 acres

<sup>1</sup> Acreages rounded per County requirements

Table 3. Sensitive Species Known from the Vicinity - the Secret Hills Ranch Project

Tutis Name																											
Manufache frieightis	Latin Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	MSCP Narrow Endemic	County Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	Probability of Occurrence	Probability Code
Astrogalise demeis  Sem Degrey Sendrever  I De	Acanthomintha ilicifolia	San Diego Thornmint		х	Х					X			х													L	_
Batheysis lucinista	Arctostaphylos otayensis	Otay Manzanita					Α	Г	Х						Х											L	1b
Consideration   Consideratio	Astragalus deanei	Dean's Milkvetch					A	х		X	х		х													L	1a
Commondation austrains   Southern Mountain Misery	Bahiopsis laciniata	San Diego Sunflower					D	х																		О	-
Contractific leptoblecal   Contractific leptob	Calochortus dunnii	Dunn's Mariposa Lily				х	A		х				х		х											L	1a
Commondaryhylor diversifidia   Summor Holly   Sum	Chamaebatia australis	Southern Mountain Misery					D		Х														Х			L	1a
Captresses forbesis	Chorizanthe leptotheca	Peninsular Spine Flower					D		Х				Х													L	1a
Dulliegu variegata   Variegated Dudleya	Comarostaphylos diversifolia	Summer Holly					Α		х						х											L	1b
Harpagemella palmeri	Cupressus forbesii	Tecate Cypress					A		х						х										$\exists$	L	1b
Februaria truncata						х	A	х																	$\exists$	L	1b
Hotekia truncata							D	х		х			Х												$\neg$	L	1a
Lepechinia ganderi	Horkelia truncata	Ramona Horkelia					Α	Г	х																	L	1a
Continue to the seminary in	Lathyrus splendens	Pride of California					D	Г	х		х		х													L	1a
Machaemathern junea         Rush like bristle bush         Image: Control of the cont	Lepechinia ganderi	Gander's Pitcher Sage				х	Α	Г	х																	L	1a
Monardella hypoleuca lanatan   Felt Leaved Rock Mint	Lotus crassifolius otayensis	Otay Mountain Lotus					Α	Г	х						х											L	1a
Notina interata	Machaeranthera juncea	Rush like bristle bush					D	х					х													L	1b
Notina interata	Monardella hypoleuca lanata	Felt Leaved Rock Mint					Α	Г	х				х												$\neg$	L	1a
Poperia leptopetala	**	Dehesa Beargrass			х	х	Α	Г	х				х												$\neg$	L	1a
Polygala comuta fishiae	Piperia leptopetala						D	Н	х			х	х	Х											$\neg$	L	1a
Quercus cedrosensis		Fish's Milkwort					D	Н	х				х												$\neg$	L	
Satureja chandleri         San Miguel Savory         A         A         X         B         X         B		Cedros Island Oak					Α	Г	х						х										$\neg$	L	1a
Satureja chandleri         San Miguel Savory         A         A         X         B         X         B	Ribes canthariforme	Morena Currant					A	Г	х																$\exists$	L	1b
Senecio ganderi         Gander's Butterweed         A         X         I         X         I	-	San Miguel Savory					-	Г					х												$\neg$	$\vdash$	
A							A	Н	х				х												$\exists$	$\vdash$	
Accipiter cooperi		Parry's Tetracoccus					-	Г	х				-												$\exists$	$\vdash$	
Accipiter striatus	Accipiter cooperi	,					Н	x		Х	х	х		х	х							х			$\exists$	$\vdash$	
Aimophila ruficeps canescens         Rufous-Crowned Sparrow         XXX         XXXX         XXXX         XXXX         XXXX         XXXX         XXXX         XXXX         XXXXX         XXXXXX         XXXXXXXX         XXXXXXX         XXXXXXXXX         XXXXXXXXXX         XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		-					Н	_	1		-	-	_		-										$\exists$	$\vdash$	
Amphispiza belli belli         Bell's Sage Sparrow         X	'	_					Н	_					_												$\dashv$	$\vdash$	
Anniella pulchra         Silvery Legless Lizard         X		1					$\Box$	_																	$\exists$	$\vdash$	
Antrozous pallidus         Pallid Bat         X<		-						x		х	х												х		$\exists$	М	2a
Aquila chrysaetos         Golden Eagle         X		, ,						_	х			х	х	х	х	х		Х	х			х			$\exists$	$\vdash$	
Bassariscus astutus         Ringtail         X </td <td></td> <td>Golden Eagle</td> <td></td> <td></td> <td></td> <td>х</td> <td>Н</td> <td>_</td> <td></td> <td><math>\dashv</math></td> <td><math>\vdash</math></td> <td></td>		Golden Eagle				х	Н	_																	$\dashv$	$\vdash$	
Buteo lineatus         Red-Shouldered Hawk         XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX								H	-		х	_	_												$\exists$	$\vdash$	
Cathartes aura         Turkey Vulture         X<		- C						H																	$\exists$	$\vdash$	
Chaetodipus californicus femoralis  Dulzura CA Pocket Mouse  X X X X X X X X X X X X X X X X X X X							H	X	x	X			x	X	x										$\dashv$	$\vdash$	_
Chaetodipus fallax fallax NW San Diego Pocket Mouse XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		-					H	$\vdash$	1				_												$\dashv$	$\vdash$	1a
Charina trivirgata roseofusca  Coastal Rosy Boa  X X X X X X X X X X X X X X X X X X X	, , ,						H	-						-				X	Х						$\dashv$	Н	
Circus cyaneus hudsonius Northern Harrier X X X X X X X X X X X X X X X X X X X							H	_				х	-												$\dashv$	$\vdash$	
Cnemidophorus hyperythrus     Orange-Throated Whiptail     X X X X X X X X X X X X X X X X X X X		-					H	_	<u> </u>	Х							х			Х					<u></u>	Н	
Cnemidophorus tigris multiscutatus Coastal Western Whiptail X X X X X M M 2a-							H	-	х		Х		х													-	
		-					H		1	-		х													$\dashv$	$\vdash$	
CONCORDA VARIAS REVOCERA I DAN DICEVE DANGEG CICANE I I I I I I I I I I I I I I I I I I I	Coleonyx variegatus abbottii	San Diego Banded Gecko					$\vdash$	X		х			X												$\dashv$	M	2a

Table 3. Sensitive Species Known from the Vicinity - the Secret Hills Ranch Project

Latin Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	MSCP Narrow Endemic	County Sensitive Plant List	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Close Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Extensive Agriculture	Probability of Occurrence	Probability Code
Corynorhinus townsendii	Townsend's Big-Eared Bat							X	X	X	X	X	X	X	X		X	X			X				M	2a
Crotalus ruber ruber	Northern Red Diamond Rattlesnake						X	X				x			X		X								M	2a
Danaus plexippus	Monarch Butterfly							X	X		X										X				M	2a
Diadophis punctatus similis	San Diego Ringneck Snake						X	X		X	X	X	X	X											M	2a
Eumops perotis californicus	Greater Western Mastiff Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Euphydryas editha quino	Quino Checkerspot Butterfly	X			X		X	X	X			X					X			X					L	1a
Felis concolor	Mountain Lion						X	X		X	X	X	X	X	X		X	X			X				L	1a
Lanius ludovicianus	Loggerhead Shrike						X		X	X	X						X	X							M	2a
Lepus californicus bennettii	SD Black-Tailed Jackrabbit						X	X	X		X	X	X	X											L	1a
Lycaena hermes	Hermes Copper						X	X				X													L	1a
Myotis ciliolabrum	Small-Footed Myotis							X		X	X	X	X	X	X			X			X				M	2a
Myotis evotis	Long Eared Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis thysanodes	Fringed Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis volans	Long Legged Myotis							X		X	X	X	X	X	X						X				M	2a
Myotis yumanensis	Yuma Myotis						X	X	X	X	X	X	X	X	X	X			X	X	X		X		M	2a
Neotoma lepida intermedia	San Diego Desert Woodrat						X	X		X	X	X													M	2a
Nyctinomops macrotis	Big Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Nyctinomops femorosaccus	Pocketed Free-Tailed Bat						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X		M	2a
Odocoileus hemionus	Southern Mule Deer						X	X	X	X	X	X	X	X	X		X	X			X				О	-
Onychomys torridus ramona	Southern Grasshopper Mouse						X	X	X			X													L	1a
Phrynosoma coronatum blainvillei	San Diego Horned Lizard						X	X	X			X													О	-
Polioptila californica	California Gnatcatcher						X																		L	1a
Salvadora hexalepis virgultea	Coast Patch-Nosed Snake						X	X				X			X										M	2a
Scaphiopus hammondii	Western Spadefoot Toad						X	X	X	Х	X	Х				X				X					L	1a
Taxidea taxus	American Badger						X	X	X		X	X	X		X		X	X			X				L	1a

- Probability of Occurrence Codes:

  L Low Probability
  M Moderate Probability
  H High Probability
  O Observed; see text for detailed discussion

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

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

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

Figure 1. Regional Location – Secret Hill Ranch Project Portion of U.S.G.S. "Alpine, California" 7.5' Quadrangle

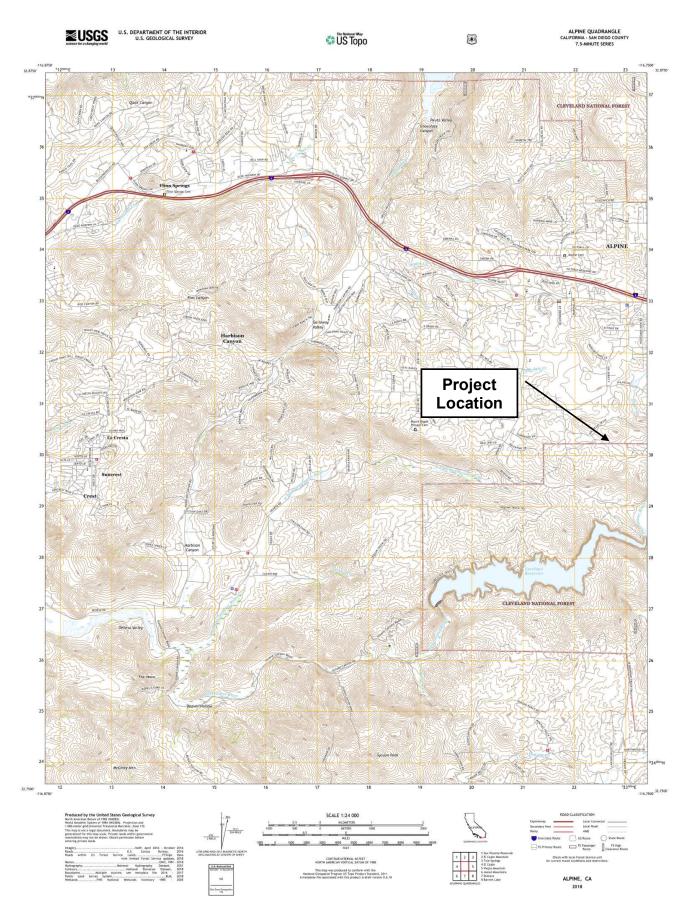


Figure 2. Recent Aerial Photo - Secret Hill Ranch Project



Figure 3. Onsite Soils Map - Secret Hill Ranch Project

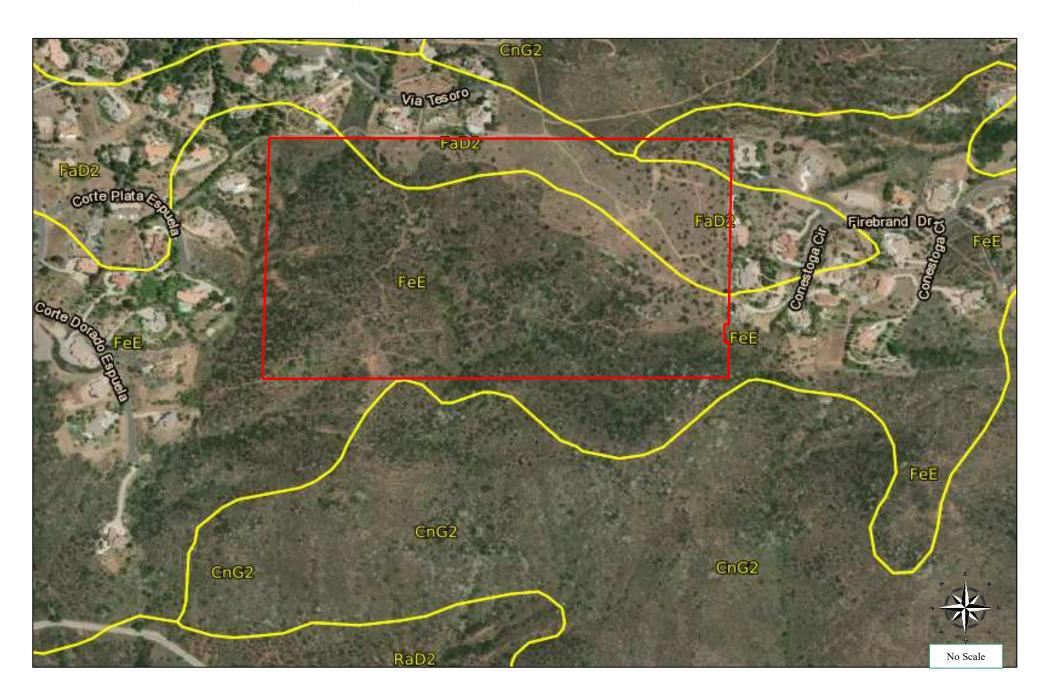


Figure 4. Onsite and Offsite Biological Resources, Fencing/Signage, and Proposed Open Space on Aerial Photograph - Secret Hill Ranch Project

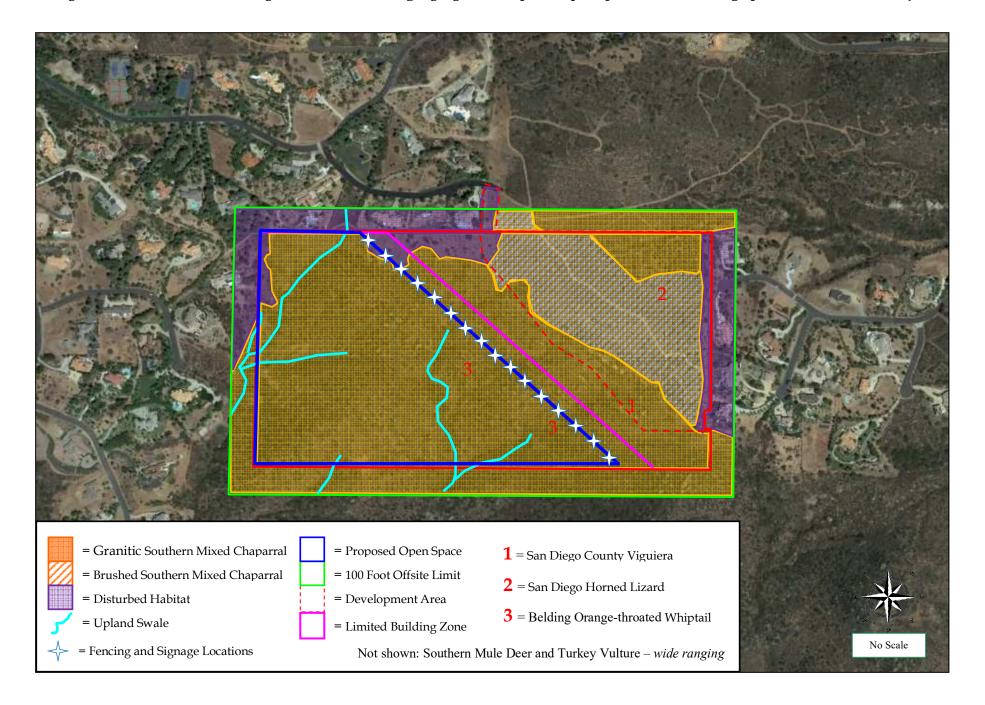
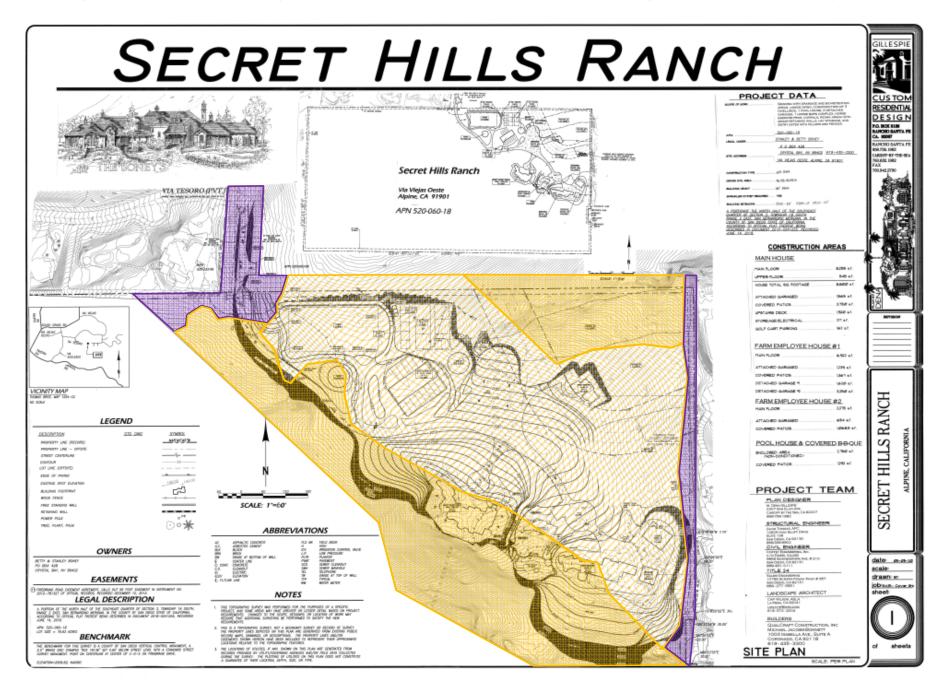


Figure 5. Onsite and Offsite Biological Resources in Development Area on Preliminary Grading Plans - Secret Hill Ranch Project



# Attachment A Fire Clearing Communications

From: Jason McBroom <jmcbroom@alpinefire.org>
Date: Monday, September 21, 2020 at 11:23 AM
To: Steve Gauthier <Steve@gauthcon.com>

Subject: RE: <no subject>

Steve,

Here is what I was given from GAFSC for the areas that were completed during the fuel break. It is on USFS private land work was completed by the GAFSC and burned by the Cal Fire local MVU unit. They were hired to burn the piles.

Jason

