

July 22, 2019

Ms. Teresa Wilkinson TTG Environmental & Associates 8885 Rio San Diego, #237 San Diego, California 92108

Subject: Apollo Senior Care Project

Dear Ms. Wilkinson:

This letter report addresses the biological resources on the Apollo Senior Care project site.

# **INTRODUCTION**

The approximately 3.3-acre project site is located at 3141 East Valley Parkway in the City of Escondido (City), California (Figures 1 and 2). This letter report is intended to provide the City and land owner with an assessment of the sensitive biological resources that occur on the site, the potential impacts of the preliminary development plan on those resources, and potential mitigation for the impacts to sensitive biological resources.

## **METHODS**

## **Vegetation Mapping**

Prior to visiting the site, aerial imagery was reviewed and a California Native Diversity Database (CNDDB) search was made to identify potential vegetation communities on the site. Alden biologist Greg Mason then conducted a site visit to map vegetation on July 6, 2019. Vegetation communities were mapped according to Holland's Preliminary Descriptions of the Terrestrial Natural Communities of California (Oberbauer, et al. 2008). During the site visit he also made lists of plant and animal species observed or detected (see Attachments A and B) and took representative photos of the site (see Attachment C and Figure 3).

## **Jurisdictional Features**

Prior to the site visit, searches of the National Hydrography Dataset (NHD) and National Wetland Inventory (NWI) were made for the project site, and during the visit, the site was assessed for features that could be considered jurisdictional by the U.S. Army Corps of Engineers (Corps), California Department of Fish & Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB).



## **Sensitive Plant Species**

A focused sensitive plant species survey was not conducted on the site. However, the project site was inspected for sensitive plant species opportunistically, although the timing of the site visit was past the flowering period of most sensitive annual species.

## **Sensitive Animal Species**

No focused sensitive animal species were conducted; however, sensitive animal species were searched for opportunistically during the site visit.

### **Tree Survey**

A tree survey was conducted on the project site by Ahles Landscape Architecture, Inc. Trees were mapped, and their dripline and diameter-at-breast-height measurements were recorded along with notations of which trees are planned to be preserved and which are planned to be removed.

### RESULTS

### **Environmental Setting**

The majority of the property has been altered, and aerial imagery back to 1946 shows that the western portion of the parcel was in agricultural production (possibly fruit trees) through some time in the 1980s. It also appears that a residence and other structures have been on the property since the 1960s (Nationwide Environmental Title Research, LLC 2019). The northern and western edges of the site consist of manufactured slopes as a result of adjacent roadway construction, and those slopes are landscaped with ornamental plant species. Driveways leading to the on-site residence enter the property from the north off of North Hidden Trails Road and from the west off of Old Guejito Grade Road (Figure 3).

The property is generally sloped to the west and north (irrespective of the manufactured roadway slopes) with elevations on site ranging from 730 to 828 feet above mean sea level. The steepest portion of the site is the hilly area in the east (east of the residence), and that area supports the only native vegetation on site. Soils on site consist of Escondido very fine sandy loam (9 to 15 percent slopes, eroded) and Friant rocky fine sandy loam (30 to 70 percent slopes).

The project site is bordered by North Hidden Trails Road to the north, East Valley Parkway and Old Guejito Grade Road to the west, undeveloped land to the east, and avocado groves to the south.

The project site is located within the boundaries of the City's Draft Multiple Habitat Conservation Program Subarea Plan (Draft Subarea Plan; Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001). It is located in the southern end of the Northeastern Habitat Area, and the vegetation shown on Figure 3-1 of the Draft Subarea Plan is agriculture. The



site is not within a Biological Core and Linkage Area (Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001).

## **Vegetation Communities**

Six vegetation along with developed land occur on site (Table 1; Figure 3).

Table 1Vegetation Communities and Land Cover on Site			
Vegetation Community/Land Cover	Acres		
Coast live oak woodland	0.13		
Diegan coastal sage scrub	0.15		
Diegan coastal sage scrub-disturbed	0.17		
Eucalyptus woodland	0.06		
Ornamental	1.10		
Disturbed habitat	1.20		
Developed	0.49		
TOTAL	3.30		

### Coast Live Oak Woodland

Coast live oak woodland is dominated by *Quercus agrifolia*, an evergreen oak that reaches 10-25 meters in height. The shrub layer is poorly developed but may support native shrubs; the herbaceous component is dominated by non-native grasses among other non-native herbaceous species. It often occurs on north-facing slopes and in shaded ravines and can intergrade with coastal scrub (Oberbauer, et al. 2008). Coast live oak woodland on occurs in the eastern portion of the property on a northwest facing slope. The understory vegetation consists primarily of non-native, herbaceous species such as black mustard (*Brassica nigra*) and slender wild oat (*Avena barbata*). Boulders are also present under the trees. The quality of the vegetation community on site is low to moderate due to the non-native understory, the woodland's limited extent, and nearby development.

Coast live oak woodland is a sensitive vegetation community, however, because it is a "sensitive biological habitat" as defined in City municipal code (Sec. 33-1052. Definitions). A sensitive biological habitat supports, or has the potential to support, any rare, endangered, threatened or candidate species of plants, trees, or animals or species of special concern as defined by the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) or Federal Endangered Species Act (16 U.S. C1531 et seq.).



## Diegan Coastal Sage Scrub

Diegan coastal sage scrub is comprised of low, soft-woody subshrubs (to approximately 1 meter high) that are most active in winter and early spring. Many taxa are facultatively drought-deciduous. This community typically occurs on dry sites, and the dominant species often include California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) along with laurel sumac (*Malosma laurina*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*). Diegan coastal sage scrub on site occurs in one patch in the southeastern corner of the property. Characteristic species in this community on site include California sagebrush, California buckwheat, laurel sumac, white sage, and lemonadeberry (*Rhus integrifolia*). Diegan coastal sage scrub is habitat for the federal threatened coastal California gnatcatcher (*Polioptila californica californica*). See Sensitive Animal Species below for a discussion of the gnatcatcher.

Diegan coastal sage scrub is a sensitive vegetation community because it is a "sensitive biological habitat" as defined in City municipal code (Sec. 33-1052, Definitions; see Coast Live Oak Woodland above for the definition).

## Diegan Coastal Sage Scrub-disturbed

Diegan coastal sage scrub-disturbed on site occurs in three patches in the eastern portion of the property. This vegetation has been partially cleared in the past, and historic soil disturbance is noticeable. Non-native plant species such as black mustard make up an appreciable percentage of the vegetative cover.

Diegan coastal sage scrub-disturbed is a sensitive vegetation community because it is a "sensitive biological habitat" as defined in City municipal code (Sec. 33-1052, Definitions; see Coast Live Oak Woodland above for the definition).

## Eucalyptus Woodland

Eucalyptus woodland on site is dominated by trees of the genus *Eucalyptus*. This community typically has little to no understory vegetation because of the allelopathic nature of the abundant leaf litter. Eucalyptus woodland on site, while not a native or sensitive community, may support avian foraging while the trees are in flower, and eucalyptus trees are also known to be used by raptors for nesting. One patch of Eucalyptus woodland occurs in the southeastern portion of the property.

#### Ornamental

Ornamental vegetation on site is where non-native landscaping has been planted. It occurs along the manufactured roadway slopes and throughout much of the rest of the site. Some species in the ornamental vegetation include pine tree (*Pinus* spp.), California pepper tree (*Schinus molle*), Mexican fan palm (*Washingtonia robusta*), and red apple ice plant (*Aptenia cordifolia*). Like eucalyptus woodland, ornamental vegetation has limited wildlife habitat value and is not a sensitive community.



## Disturbed Habitat

Disturbed habitat on site includes areas that are cleared of vegetation (mowed), and/or land containing a preponderance of non-native plant species. Some of the non-native species of disturbed habitat on site include tocalote (*Centaurea melitensis*), Crete hedypnois (*Hedypnois cretica*), black mustard, and cheeseweed (*Malva parviflora*). Since disturbed habitat is regularly altered (mowed) and/or supports a preponderance of non-native plant species on site, it has little wildlife value, and it is not a sensitive vegetation community.

### Developed

Developed land on site includes the residential buildings/structures and driveways.

### **Tree Survey Results**

There are 81 trees on site including oak, pine, olive, ash, California pepper, crape myrtle, Canary Island date palm, eucalyptus, juniper, Norfolk Island pine, and windmill palm (Figure 3).

### **Sensitive Plant Species**

No sensitive plant species were observed site during the site visit, although it was conducted at a time of year when most sensitive annual species have finished blooming. The CNDDB search did not identify any sensitive species on site or in the vicinity of the site. Based on the site's past and current land uses/disturbances and the limited area of native vegetation present, the potential for sensitive plant species to occur on site is considered low.

#### **Sensitive Animal Species**

Based on the site's past and current land uses/disturbances and the limited area of native vegetation present, the potential for sensitive animal species to occur on site is considered low, and none was observed or detected during the site visit. Three sensitive species have been reported to the CNDDB in the vicinity of the site as follows.

<u>Coastal California Gnatcatcher</u>. The federal threatened coastal California gnatcatcher has been reported to the CNDDB in the vicinity of the site, and the U.S. Fish and Wildlife Service has designated Critical Habitat for the gnatcatcher immediately off site to the east. However, the Draft Subarea Plan (Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute 2001) states:

Although coastal California gnatcatchers have occasionally been sighted in the Northeastern Habitat Area, coastal sage scrub habitats in the northeast core are generally considered suboptimal for the gnatcatcher because they are situated at the eastern edge of the species' distribution and above the typical elevational range of the species in San Diego County. The resulting climatic conditions (lower



temperatures) constrain the gnatcatcher's ability to utilize these areas throughout the year. Only one gnatcatcher locality has been recorded in this area despite extensive surveys there.

<u>Least Bell's Vireo (Vireo bellii pusillus)</u>. The federal endangered least Bell's vireo has been reported to the CNDDB in the vicinity of the site; however, there is no least Bell's vireo habitat (riparian woodland and scrub) present on site, so the species is not expected to occur there.

<u>The Dulzura Pocket Mouse (Chaetodipus californicus femoralis)</u>. This California Species of Special Concern was reported to the CNDDB in the vicinity of the site; however, it is not included in the Draft Subarea Plan list of species occurring or potentially occurring in the City. This pocket mouse is primarily associated with mature chaparral, which is not present on site. Therefore, the Dulzura pocket mouse is not expected to occur there.

### **Nesting Birds**

The federal Migratory Bird Treaty Act (MBTA) regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others. Disturbance that causes nest destruction or abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." Given the presence of shrub- and tree associated vegetation on site, there is potential for nesting on site by MBTA-regulated species.

### Wildlife Corridors

The site is located on the eastern edge of the developed City, and according to the Draft Subarea Plan is not within a Biological Core and Linkage Area, which is a large block of natural habitats that "contribute to regional landscape linkages that connect a number of diverse and sensitive habitats, plants, and animals between northern San Diego County's coastal environments and its more interior and drier foothill habitats." Therefore, the site is not a wildlife corridor, nor does it occur within such a corridor.

#### **Jurisdictional Features**

There are no drainages or wetland areas on site; as such, there are no areas that would be considered jurisdictional by the Corps, CDFW, and RWQCB.



# IMPACTS

Based on the project's preliminary development plan impact footprint, construction of the project would impact a total of 2.47 acres on site, as well as 0.02 acre of ornamental vegetation off site (to construct a storm drain system; Table 2; Figure 3). Impacts to coast live oak woodland and Diegan coastal sage scrub-disturbed would be significant and require mitigation because these vegetation communities are considered "sensitive biological habitats." Impacts to eucalyptus woodland, ornamental, disturbed habitat, and developed would be less than significant because they are not sensitive, and no mitigation would be required.

Table 2					
Preliminary Impacts to Vegetation Communities and Land Cover (acres)					
Vegetation Community/	Existing	Impacted	Impacted	Total	
Land Cover	On Site	On Site	Off Site	Impacted	
Coast Live oak woodland	0.13	0.01	0.00	0.01	
Diegan coastal sage scrub	0.15	0.00	0.00	0.00	
Diegan coastal sage scrub-	0.17	0.02	0.00	0.02	
disturbed	0.17	0.03	0.00	0.05	
Eucalyptus woodland	0.06	0.02	0.00	0.02	
Ornamental	1.10	0.83	0.02	0.85	
Disturbed habitat	1.20	1.10	0.00	1.10	
Developed	0.49	0.48	0.00	0.48	
TOTAL	3.30	2.47	0.02	2.49	

# MITIGATION

## **Impacts to Sensitive Biological Habitats**

Per City Municipal Code (Sec. 33-1069, Vegetation Protection and Replacement Standards), Sensitive biological habitat that is removed shall be mitigated either on site or off site by the planting of the same habitat species at a minimum ratio of one to one (1:1). If replacement of sensitive biological species and/or habitat is not feasible on or off site, other equivalent mitigation measures may be considered by the director.

It is anticipated that the project will mitigate for impacts to sensitive biological habitats (coast live oak woodland and Diegan coastal sage scrub-disturbed) through purchase of credits for 0.04 acre in an approved habitat mitigation bank. Per City Municipal Code (Sec. 33-1576, Guidelines.), "All grading, clearing, grubbing and landscaping which involves the loss of Coastal Sage Scrub (CSS) shall be in conformance with Section 4(d) of the Endangered Species Act, as well regulations and guidelines of the Department of Fish and Wildlife, Fish and Game, and Multiple Habitat Conservation Program (MHCP)." A 4(d) Habitat Loss Permit from the City is anticipated to be required for the project because the City's MHCP Subarea Plan is still in draft form.

# **Impacts to Mature and Protected Trees**

For impacts to mature and protected trees, City Municipal Code (Sec. 33-1069, Vegetation Protection and Replacement Standards) states:

- If mature trees cannot be preserved on-site, they shall be replaced at a minimum one to one (1:1) ratio. The preferred replacement is a tree(s) of equal size and caliper. Protected trees shall be replaced at a minimum two to one (2:1) ratio.
- The number, size and species of replacement trees shall be determined on a case-by-case basis by the director, based on the specific circumstances of each request, the characteristics and condition (size, age and location) of the individual trees involved, and any professional report.
- The planting location of the replacement trees may be on-site or elsewhere in the City, as determined by the director.
- Replacement trees and habitat mitigation sites shall be maintained in a flourishing manner on a continuing basis. (Ord. No. 2001-21, § 5, 8-22-01)

The City (2019) stated the following for the project:

The tree survey shows that 23 oaks will be removed. Replacement standards in Section 33-1069(b) of the Zoning Code require replacement with 26 oaks (20 at a 1:1 ratio and three at a 2:1 ratio). Only 10 oaks are shown on the landscape plan. Off-site replacement or an alternative solution may be necessary if on-site replacement is not possible.

## **Impacts to Nesting Birds**

To ensure that MBTA-regulated species' nesting activities are not impacted, a pre-construction general nesting bird survey should be conducted within all potential nesting habitat (in this case, shrub- and tree-associated vegetation on site) that may be impacted by active construction during the general avian breeding season (February 1 through August 31). If site clearing, grubbing, grading, and construction occurs outside this time frame, no mitigation would be required. The pre-construction survey should be conducted no more than 7 days prior to initiation of construction. If no active avian nests are identified within the development impact footprint area or within a 300-foot buffer of the proposed development project area (as feasible), no further mitigation is necessary. If active nests of avian species regulated by the MBTA are detected within the proposed development footprint or within a 300-foot buffer, construction should be halted until the young have fledged, until a qualified biologist has determined the nest is inactive, or until appropriate mitigation measures that respond to the specific situation have been developed and implemented in consultation with the regulatory agencies.

# CONCLUSION

The site is largely former agricultural land that now supports disturbed habitat and ornamental vegetation. Some sensitive biological habitats are present on the hilly area in the eastern portion of the site. A residence and other structures and two driveways are also present.

No sensitive plant or animal were observed on the site during the field visit, and based on the site's past and current land uses/disturbance and the limited area of native vegetation present, the potential for sensitive plant and animal species to occur on site is considered very low.

The project's preliminary development plan impact footprint would impact two sensitive biological habitats, and mitigation for those impacts is anticipated to involve purchase of credits in an approved habitat mitigation bank. The project would also impact mature and protected trees. Mitigation for the loss of those trees would be conducted per City Municipal Code Sec. 33-1069 (Vegetation Protection and Replacement Standards) in coordination with the City. Finally, the project would also comply with the provisions of the MBTA to protect regulated avian species' nesting and any other City environmental requirements not noted herein.

Please contact me if you have any questions regarding this letter report.

Sincerely,

Greg Mason Senior Biologist

Enclosures: Figure 1 – Regional Location Figure 2 – Project Location Figure 3 – Biological Resources Attachment A – Plant Species Observed Attachment B – Animal Species Observed or Detected Attachment C – Representative Photographs

## **References**:

- City of Escondido. 2019. Letter from Bill Martin (Director of Community Development, Planning Division) to Joe Holasek (NOAA Group) RE: PHG19-0015 Conditional Use Permit for New Assisted Living/Memory Care Facility, 3141 East Valley Parkway. June 20.
- Ogden Environmental and Energy Services Co., Inc. and Conservation Biology Institute. 2001. Public Review Draft Escondido Subarea Plan Implementing the Multiple Habitat Conservation Program. City Case File 95-25-GPIP. June. https://www.escondido.org/draftescondido-subarea-plan.aspx



Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge. March 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California", Robert F. Holland, Ph.D., October 1986.







# Attachment A PLANT SPECIES OBSERVED

SCIENTIFIC NAME	COMMON NAME	VEGETATION
LYCOPODIAE		<u>COMMONT P</u>
Selaginellaceae – Moss Family Selaginella bigelovii	Bigelow's mossfern	CSS
ANGIOSPERMAE – MONOCOTYLEDO	NEAE	
Pinaceae – Pine Family Pinus sp. <sup>2</sup>	ornamental pine tree	DEV, ORN
Poaceae– Grass Family Avena barbata <sup>2</sup> Bromus diandrus <sup>2</sup> Bromus madritensis ssp. rubens <sup>2</sup> Cynodon dactylon <sup>2</sup> Festuca myuros <sup>2</sup>	slender wild oat ripgut grass red brome Bermudagrass foxtail fescue	CSS, DH, OW DH DH DH, DEV DH
ANGIOSPERMAE – DICOTYLEDONEA	E	
Aizoaceae – Ice Plant Family Aptenia cordifolia <sup>2</sup> Mesembryanthemum crystallinum	red apple ice plant <sup>2</sup> iceplant	ORN DH
Anacardiaceae – Sumac Family Toxicodendron diversilobum Malosma laurina Rhus integrifolia Rhus ovata Schinus molle <sup>2</sup>	poison oak laurel sumac lemonadeberry sugar bush California pepper	CSS CSS CSS CSS DH, ORN
Aracaceae – Palm Family Phoenix canariensis <sup>2</sup> Syagrus romanzoffiana <sup>2</sup> Washingtonia robusta <sup>2</sup> Chamaerops humilis <sup>2</sup>	Canary Island date palm queen palm Mexican fan palm windmill palm	ORN ORN ORN ORN
Araucariaceae – Conifer family Araugaria heterophylla <sup>2</sup>	Norfolk Island pine	DH
Asteraceae – Sunflower Family Artemisia californica	California sagebrush	CSS

Centaurea melitensis <sup>2</sup>	tocalote	CSS, DH
Eriophyllum confertiflorum	golden yarrow	CSS, DH
Heterotheca grandiflora	telegraph weed	CSS
Hypochaeris glabra <sup>2</sup>	smooth cat's-ear	DH
Hedypnois cretica <sup>2</sup>	Crete hedypnois	DH
Logfia filaginoides	California filago	CSS, DH
Sonchus asper <sup>2</sup>	prickly sow thistle	DH
Boraginaceae – Borage Family		
Amsinckia intermedia	fiddleneck	CSS
Phacelia parryi	Parry's phacelia	CSS
Brassicaceae – Mustard Family		
Brassica nigra <sup>2</sup>	black mustard	OW, CSS, DH, DEV
Hirschfeldia incana <sup>2</sup>	short-pod mustard	DH, DEV
Convoluzione Marria Clary Fo		
Convolvulaceae – Morning-Glory Fa		CSS
Culyslegia macroslegia	doddor	CSS OW
Cuscula subinclusa	dodder	C35, UW
Crassulaceae-Stonecrop Family		
Crassula ovata	jade plant	ORN
Cucurbitaceae-Cucumber Family		
Marah macrocarpa	wild cucumber	CSS
Cupressages Conifer Family		
Luningung sp. <sup>2</sup>	iuninor	OPN
Jumperus sp.	Jumper	OKIN
Fabaceae (Leguminosae) – Pea Fami	ly	
Acacia redolens <sup>2</sup>	prostrate acacia	ORN, DEV
Fagaceae-Oak Family		
Quercus agrifolia var. agrifolia	coast live oak	OW, CSS, DH, ORN
Geraniaceae – Geranium Family		
Erodium botrys <sup>2</sup>	storkshill	DH DEV
Erodium cicutarium <sup>2</sup>	red-stem filaree	DH DEV
Li outum cicutai tam	ieu stem maree	
Lamiaceae – Mint Family	1 1 1	DU
Marrubium vulgare <sup>2</sup>	horehound	DH
Salvia apiana	white sage	CSS
Lythraceae- Loosestrife Family		
Lagerstroemia sp. <sup>2</sup>	crape myrtle	
Malvaceae – Mallow Family		
<i></i>		

Malva parviflora <sup>2</sup>	cheeseweed	DH
Myrtaceae – Eucalyptus Family Eucalyptus <i>sp</i> . <sup>2</sup>	eucalyptus	EW, ORN
Orobanchaceae-Broomrape Family Castilleja affinis ssp. affinis	coast paint-brush	CSS
Oleaceae- Olive Family Olea europaea <sup>2</sup> Fraxinus sp. <sup>2</sup>	olive ash	DH ORN
Phyrmaceae – Lopseed Family Mimulus aurantiacus	monkey flower	CSS
Polygonaceae – Buckwheat Family Eriogonum fasciculatum ssp. fasciculatum	California buckwheat	CSS
Primulaceae – Primrose Family Anagallis arvensis <sup>2</sup>	scarlet pimpernel	DH, DEV
Solanaceae – Nightshade Family Nicotiana glauca <sup>2</sup>	tree tobacco	DH

<sup>1</sup>Vegetation community acronyms: CSS = coastal sage scrub, OW=coast live oak woodland, DH = disturbed habitat, DEV=developed, ORN=ornamental

<sup>2</sup>Non-native species

### Attachment B ANIMAL SPECIES OBSERVED OR DETECTED

#### SCIENTIFIC NAME

#### **COMMON NAME**

#### **INVERTEBRATES**

Agraulis vanilla Apis mellifera Cicada sp. Papilio zelicaon Pepsis sp. Pieris rapae Pogonomyrmex barbatus Polyommatus icarus gulf fritillary honeybee cicada anise swallowtail tarantula hawk cabbage white red harvester ant southern blue

### VERTEBRATES

#### **Reptiles**

Sceloporus occidentalis

#### **Birds**

Calypte anna Carpodacus mexicanus Cathartes aura Colaptes auratus Corvus corax Icterus cucullatus Melospiza melodia Mimus polyglottos Sialia mexicana Zenaida macroura

## **Mammals**

Canis latrans Neotoma sp. Otospermophilus beecheyi Thomomys bottae western fence lizard

Anna's hummingbird house finch turkey vulture northern flicker common raven hooded oriole song sparrow northern mockingbird western bluebird mourning dove

coyote wood rat California ground squirrel Botta's pocket gopher

Attachment C REPRESENTATIVE PHOTOGRAPHS



Photo Point 1. 7/7/19



Photo Point 2. 7/7/19



Photo Point 3. 7/7/19



Photo Point 4. 7/7/19



Photo Point 5. 7/7/19



Photo Point 6. 7/7/19



Photo Point 7. 7/7/19



Photo Point 8. 7/7/19



Photo Point 9. 7/7/19



Photo Point 10. 7/7/19



Photo Point 11. 7/7/19



Photo Point 12. 7/7/19



Photo Point 13. 7/7/19



Photo Point 14. 7/7/19



Photo Point 15. 7/7/19



Photo Point 16. 7/7/19



Photo Point 17. 7/7/19



Photo Point 18. 7/7/19



Photo Point 19. 7/7/19



Photo Point 20. 7/7/19



Photo Point 21. 7/7/19



Photo Point 22. 7/7/19



Photo Point 23. 7/7/19