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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 13, 2025

Kirsten Uchitel
San Diego Association of Governments
1011 Union Street, Unit 400
San Diego, CA 92101
kirsten.uchitel@sandag.org

Subject: Draft Environmental Impact Report (DEIR) for the 2025 Regional Plan, SCH No. 2023010039, San Diego County, CA

Dear Kirsten Uchitel:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the San Diego Association of Governments' (SANDAG) for the 2025 Regional Plan (Plan) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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example, the Plan may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Plan as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Plan proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program (Fish & G. Code, § 2800 et seq.). While SANDAG is not an implementing entity of any regionally adopted NCCP, the DEIR includes lands within several NCCP plan areas, including: all Subarea Plans under the Subregional Multiple Species Conservation Program (MSCP), draft North County Plan, draft East County Plan, and all Subarea Plans under the Subregional Multiple Habitats Conservation Plan (MHCP). Subsequent projects tiering off of the DEIR may be subject to the provisions of the respective NCCP.

PLAN DESCRIPTION SUMMARY

Proponent: San Diego Association of Governments (SANDAG)

Objective: The Plan is an update to San Diego Forward: The 2021 Regional Plan adopted in October 2021 and subsequently amended in October 2023, and the 2021 Federal Regional Transportation Plan, adopted in December 2021. The DEIR analyzes the significant environmental impacts of the proposed 2025 Plan, which focuses on developing an integrated planning strategy for achieving sustainability in the areas of land use decisions, housing development, and planned transportation for the San Diego region through 2050. The Plan delineates an integrated transportation system throughout the 11 Major Travel Corridors of the San Diego region, specifically: South Bay to Sorrento; Central Mobility Hub; State Route 125 (SR 125); Interstate 15 (I-15); Interstate 5 (I-5) North Coast Corridor; State Route 94 (SR 94); Interstate 8 (I-8); Coast, Canyons, and Trails; State Route 56 (SR 56); San Vicente; and North County.

The programmatic and long-term nature of the proposed Plan necessitates a general, and at times qualitative approach, to the evaluation of impacts. The DEIR analyzes impacts for the two main physical components of the proposed Plan, as well as the combined impacts of these components: regional growth and land use change, and transportation network improvements and programs.

The DEIR functions as a Programmatic EIR under CEQA Guidelines Section 15168 for streamlining future projects. The DEIR provides a foundation for second-tier CEQA

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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documents for subsequent projects but does not analyze the project-specific impacts of individual projects. Examples of subsequent projects covered by the DEIR are:

- Central County Subregion:
  - I-15 Bikeway: Murphy Canyon Road to Affinity Court,
    State Route 52 Bikeway: I-5 to Santo Road;
  - Regional Rail 398: Oceanside to Downtown San Diego (Double tracking, bridge replacements, realignment in Del Mar, new platform at Fairgrounds);
  - Regional Rail 398: Camp Pendleton to Downtown San Diego (Grade separations, curve straightening, Miramar Tunnel, new station at Camp Pendleton and UTC)
  - Light Rail 582: Mission Valley to U.S.–Mexico Border via City Heights, National City, and Chula Vista; and
  - Regional Rail 598: Pacific Surfliner Rail2Rail (LOSSAN).

- East County Subregion:
  - San Diego River Trail: Mast Park to Lakeside Baseball Park;
  - San Diego River Trail: Carlton Oaks Segment;
  - State Route 94 Multi-Use Pathway;
  - State Route 67: Multimodal operational improvements with shoulder widening for enhanced emergency access from Mapleview to Dye Road;
  - State Route 76: Shoulder widening along Pala Reservation Western Boundary to Pala Reservation Eastern Boundary; and

  - State Route 94: Jamul Reservation to Tecate Road Shoulder Widening/Straightening.

- North County Subregion:
  - Mid-County Bikeway: Coastal Rail Trail to Inland Rail Trail
  - Inland Rail Trail: Vista to Oceanside,
  - San Luis Rey River Trail,
  - State Route 76: SR 79 to Valley Center Road Facility Improvements, Rice Canyon Road to Pala Reservation Road Straightening, and Harolds Road to Pauma Rancho Road Straightening; and
  - SPRINTER (Oceanside to Escondido): Double-tracking and grade separations.

Location: The Plan encompasses the entirety of San Diego County, which is more than 4,200 square miles. Most of the urban development lies in the western portion of San Diego County near the coast. Development inland in the eastern portion of the region is less dense and has a more rural character. The boundaries of the Plan include the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and unincorporated areas within the County.

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Over half of the total land area in the region is not available for public development, including public lands, dedicated parks and open space, lands constrained for environmental reasons, and military use.

Timeframe: The 2025 Regional Plan projects impacts forward to 2050. SANDAG is required to update the Regional Plan every 4 years.

Biological Setting: The DEIR identifies 17 vegetation types in three categories in the San Diego Region: Wetlands and Riparian (Beach/Coastal Dunes/Saltpan/Mudflats, Marsh, Meadows and Seeps, Open Water and Streams, Riparian Forest/Woodland, Riparian Scrub, Vernal Pools), Uplands (Chaparral, Coastal Scrub, Desert Dunes, Desert Scrub, Oak Woodlands, Forest/Woodland, Grasslands), and Other Cover Types (Agriculture, Disturbed Habitat, Urban/Developed). As indicated in the DEIR, 34 federally or state-listed or candidate plant species and approximately 244 additional special-status plant species have known distributions within San Diego County. Twenty-nine (29) federally and/or state-listed or candidate animal species have potential to be found within San Diego County, as year-round residents or as migrants. An additional 138 special status wildlife species have known distributions within San Diego County.

Wildlife movement occurs across landscape features (e.g., wildlife corridors, habitat linkages) within the boundaries of the Regional Plan. The various NCCP plans, both adopted and still in draft, identify landscape-level biological linkages that serve to connect large tracts of core habitat. These linkages allow species movement over time between habitat patches that would otherwise be disconnected. The DEIR focuses on the qualitative and quantitative analysis of landscape level regional wildlife movement and habitat linkages rather than specific local corridors (e.g., small canyons, ephemeral drainages); the latter would be evaluated individually during subsequent project-level CEQA review.

The Biological Resources section of the DEIR projects significant and unavoidable impacts in 2035 and 2050 to natural resources from projects tiering from the Plan:

> BIO-1 projects significant and unavoidable impacts to sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS and state or federally regulated waters and wetlands through direct removal, filling, hydrological interruption, or other means. BIO-1 mitigation measures include: design, minimization, and avoidance measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources; provision of compensatory mitigation; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.
>
> BIO-2 projects significant and unavoidable direct and indirect impacts to certain species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or listed by CDFW or USFWS, including their federally designated critical habitat, or species that are considered sensitive

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in CEQA Guidelines Section 15380. BIO-2 mitigation measures include: design, minimization, and avoidance measures for Special Status animal species; provision of compensatory mitigation for Special Status plant and animal species; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.

BIO-3 projects significant and unavoidable impacts to the movement of native resident or migratory fish and wildlife species, to established native resident or migratory wildlife corridors, and to the use of native wildlife nursery sites. Mitigation would involve facilitation of wildlife movement.

BIO-4 projects that no conflicts with any approved HCPs, NCCPs, other conservation plans, and local biological protection policies and ordinances would occur. The DEIR states that encroachment into hardline preserve areas would not conflict with NCCPs or HCPs because biologically equivalent or superior compensation of habitat or project redesign would be required when there is encroachment into hardline preserve areas. Thus, BIO-4 projects less than significant impacts. The County of San Diego's draft North County and East County Plans were not included in this analysis.

CDFW's primary concerns with respect to climate change in San Diego County are the effects on biodiversity, special status plant and wildlife species, natural vegetation communities, and connections which maintain viable movement corridors between blocks of conserved habitat. Because climate change may impact species directly or indirectly by altering the distribution of vegetation types, promoting expansion of non-native species, duration and severity of drought, and increased frequency or magnitude of wildfires, CDFW considers the use of regional scale, multiple species conservation plans to be a valuable tool to lessen the effects of climate change.

COMMENTS AND RECOMMENDATIONS

It is the policy of CDFW to promote and foster the development of planning strategies at the ecosystem level through active participation in local development of regional NCCPs, which often include innovative multiple species habitat conservation planning efforts (e.g., MSCP). The success of these plans is reliant on maintaining core biological resource areas and habitat linkages that are essential to the long-term biological viability of associated flora and fauna. Many of the projects defined within the Plan extend through diverse and biologically valuable habitats where the need for comprehensive planning and creative designs solutions will be essential to ensure goals and objectives articulated in current and draft NCCP/HCP efforts are not undermined. CDFW believes the Plan provides a unique opportunity to develop and refine the SANDAG policies and strategies that could lead to more effective implementation of resource conservation and species protection. This includes compliance with State and Federal endangered species acts, approved NCCP/HCPs (e.g., County of San Diego's

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and City of San Diego's approved MSCP and several others) and the in-process North County and East County Plans. Our comments below are intended to complement existing work to date and provide guidance to reduce the potential for any subsequent conflict that could occur between existing and/or future plans, and other regulations for species protection (e.g., MSCP/MHCP, Lake and Streambed Alteration Agreements under Fish and Game Code §1600 et seq., Fish and Game Code §3500, et seq., etc.) that have received, or are anticipated to receive, State and Federal permits.

CDFW offers the comments and recommendations below to assist SANDAG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Recommendations may also be included to improve the document.

COMMENT # 1: Consistency with Natural Community Conservation Planning (NCCP) Programs

Issue: The DEIR does not analyze potential conflicts with draft and final NCCPs.

Specific impact: The North and East County Plans have not yet been finalized; however, in March 2021, the County of San Diego (County) reinstated the Planning Agreement with the United States Fish and Wildlife Service (USFWS) and CDFW for both draft plans. The County has completed the North County Plan conservation design and identified priority areas for conservation that are being considered in the CEQA analysis of development projects within the North County Plan planning area. While a planning effort for the eastern portions of the San Diego region was considered by the County in 2008, the East County Plan planning efforts have slowed. However, preliminary conservation design was completed for this area, which identified areas for conservation that are considered during CEQA analysis as described above for the North County Plan. Without a discussion of these draft NCCPs, CDFW is concerned that subsequent projects that tier off the Regional Plan may conflict with the goals and objectives of the draft NCCPs. The Regional Plan is an appropriate document to highlight this outstanding need.

Why impact would occur: There has been an ongoing effort by the County and the Wildlife Agencies (CDFW and USFWS; collectively, the Wildlife Agencies) to finalize the draft North County Plan and prepare the draft East County Plan. To ensure compliance with the CEQA Guidelines Section 15125(d), the DEIR should discuss any inconsistencies between the proposed projects described in the Plan and applicable general plans and regional plans, such as the draft North and East County Plans.

Furthermore, the Planning Agreement outlines an Interim Review Process to ensure that preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures are not precluded and that project impacts are adequately mitigated. Projects subject to the Interim Review Process are partly defined within the Planning Agreement as projects subject to

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discretionary permits. The Plan includes proposed projects that may impact land formerly subject to the County's discretionary permitting process and thereby the Interim Review Process. CDFW requests the Plan include a supplemental analysis for Biological Resources to ensure regional conservation objectives of the draft North and East County Plans would not be eroded by implementation of the Plan.

Lack of analysis of future conflicts with the draft North and East County Plans may inhibit forward planning for preservation, acquisition, management and monitoring of open space and biological resources and funding opportunities for support of the existing and future conservation actions.

Evidence impact may be significant: Compliance with approved and draft habitat plans, such as the MSCP, MHCP, and draft North and East County Plans, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. The proposed Plan update occurs across multiple NCCP areas and is subject to the provisions and policies of the appropriate NCCPs. An assessment of the impacts to the various NCCPs as a result of the Plan update is necessary to address CEQA requirements.

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #1: <u>Recirculate with NCCP information</u>. SANDAG should consider recirculating the DEIR to include additional information about the draft NCCPs in the Plan area. The recirculated DEIR should specify how the Plan and subsequent projects will have "no impact" in terms of conflict with draft and final NCCPs.

COMMENT # 2: Connectivity

Issue: The Plan crosses multiple NCCP linkage areas and construction and associated activities in these areas may prevent wildlife from utilizing the linkages.

Specific impact: Project activities such as working in and constructing new infrastructure within wildlife linkage areas may prevent wildlife from using these areas, thus reducing connectivity.

Why impact would occur: NCCP linkage areas are important for wildlife connectivity for numerous sensitive species, such as coastal California gnatcatcher (*Polioptila californica californica; Endangered Species Act (ESA)-listed threatened and California Species of Special Concern (SSC)),* and Peninsular Bighorn Sheep (*Ovis canadensis nelsoni; ESA-listed endangered and CESA-listed threatened)*, as well as fish species. The DEIR lacks information for CDFW to determine if the anticipated transportation projects described in the Plan will negatively affect wildlife connectivity. In general, wildlife is losing its ability to move and migrate as habitat is converted, or infrastructure built (Leonard et al., 2017). New roads or other transportation infrastructure may

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present a semi-permeable to impermeable barrier to wildlife connectivity. By reducing connectivity, reductions in gene flow and lower genetic diversity can lead to overall reductions in a population's fitness and adaptability.

The ecological footprint of roads extends beyond its physical footprint due to road mortality, habitat fragmentation, and indirect impacts (Spencer et al, 2010). Limiting movement and passage of species can lead to the reduction of genetic fitness in populations, making them more vulnerable to stochastic events or extreme conditions, and lead to the inability of populations to recolonize habitat after disturbance events (e.g. fires, floods, droughts). It also can result in the loss of resident wildlife populations by altered community structure (e.g. species composition, distribution), and/or partial or complete loss of populations of migrant species due to blocked access to critical habitats (CDFW, 2009; Haddad et al., 2015; Nicholson et al., 2006).

The California Fish Passage Assessment Database [ds69] on BIOS a shows that there are several potential fish passage locations which warrant or require further assessment, according to reconnaissance surveys done by Pacific States Marine Fisheries Commission or California Conservation Corps in 2020 and 2021. Improper stream crossing design and installation can create fish passage barriers which would be detrimental to the multiple sensitive fish species found throughout San Diego County. This potential disruption of the longitudinal connectivity of rivers and other bodies of water by the installation and/or repairs to transportation infrastructure may impede fish movements to feeding and spawning grounds (Barbarossa et al., 2020).

The DEIR should recognize that additional areas for fish and wildlife movement may be subsequently identified through future studies and/or become necessary as a result of future urbanization/development in San Diego County. Thus, projects which tier off the final EIR may need to address wildlife corridor issues beyond the corridors identified in the DEIR.

Evidence impact would be significant: Changes to road width and levels of human disturbance are reasonable potential direct and indirect physical changes in the environment that will likely impact wildlife connectivity. Habitat conversion and fragmentation forces many California species to migrate in search of replacement habitat, and it also risks continued survival of species by compromising genetic diversity, among other things. (Fish & G. Code, § 1955 (b).) California wildlife is losing the ability to move as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors (Fish & G. Code, § 1955 (c).) Habitat connectivity and wildlife migratory corridors are essential to the continued survival of many California species. (Fish & G. Code, § 1955 (d).) Habitat connectivity is also necessary to reduce wildlife-vehicle collisions, which put people and wildlife at risk of injury or death. (Fish & G. Code, § 1955 (e).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 711.7.)

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In addition, Streets and Highways Code section 156.3 (Senate Bill 857) requires the California Department of Transportation (Caltrans), who is often a Lead Agency along with SANDAG on the specific projects analyzed under this Plan, to assess and address potential fish passage barriers for projects affecting fish bearing streams, in consultation with CDFW. As the activities described within the Plan may affect fish passage barriers, this is a potentially significant impact under CEQA that should be analyzed and addressed (CEQA Guidelines § 15071(e)).

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #2: The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 4.4-34 of the DEIR) as well as corresponding text on page 4.4-35 should be expanded to include certain omitted linkages prior to publication of the final EIR. Connectivity throughout the subregional MHCP and draft North and East County Plans should be included; for example, connections through Oceanside for coastal California gnatcatcher should be added to the map. The map is also missing the linkage along the I-15 through North County. Additionally, there is no reference to linkage in the text. Additionally, it is not clear if Multi-Habitat Planning Areas (MHPA) on the map shown near the Border include the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep and whether this is included in the areas referenced in the text on page 4.4-32 under the Las Californias Binational Conservation Initiative section.

COMMENT # 3: Impacts to Quino checkerspot butterfly

Issue: The Plan includes projects that may impact suitable habitat for Quino checkerspot butterfly (*Euphydryas editha quino*; *ESA-listed endangered and CESA candidate*), and ground disturbing activity may result in take of these species.

Specific impact: The DEIR states that Quino checkerspot butterfly is federally endangered and does not have any protections under CESA (Page 4.4-16). On August 13, 2025, the California Fish and Game Commission accepted a petition to list Quino checkerspot butterfly under CESA, determining the listing “may be warranted” and advancing the species to the candidacy stage of the CESA listing process. Activities resulting in ground disturbance or vegetation disturbance could result in loss of foraging resources and/or direct take.

Why impact would occur: Quino checkerspot butterfly was once a common butterfly throughout Southern California but has lost over 75% of its habitat. The Quino checkerspot butterfly is now only known from 62 potential sites in southern San Diego and Riverside Counties. Of those 62, the butterfly has been observed in only 33 sites (53.2%) during the last 10 years, and all sites are threatened by habitat destruction, degradation, fragmentation, wildfires and the effects of climate change.

Activities related to individual projects described in the Plan could result in potential significant impacts, including loss of foraging resources, changes in foraging behavior, reduced health and vigor of eggs, young, and/or adults and direct mortality. Ground

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disturbance and vegetation removal associated with project implementation during the breeding season could result in the loss of breeding success. Habitat loss resulting from project activities will contribute to a cumulative decrease of foraging habitat for this species, as urban development projects continue to eliminate tracts of native vegetation. Thus, projects which tier off the final EIR may need to address impacts to Quino checkerspot butterfly beyond the analysis identified in the DEIR.

Quino checkerspot butterfly is not a Covered Species under the City of San Diego's MSCP or Vernal Pool Habitat Conservation Plan, the County's MSCP, or draft North County Plan; therefore, impacts to Quino checkerspot butterfly and their habitat were not anticipated, analyzed, or authorized in the associated NCCP permits. Appropriate take authorization from CDFW under CESA may include an Incidental Take Permit (ITP) or a Consistency Determination, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP.

Evidence impact may be significant: Quino checkerspot butterfly is a CESA candidate species, and take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). CDFW considers impacts to species that are candidates for CESA listing to be significant under CEQA. Accordingly, the activities described in the Plan may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The Plan may reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Quino checkerspot butterfly. The Plan may include projects that may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands.

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #3: Disclosure of potential impacts to Quino checkerspot butterfly. The EIR should be updated to reflect the status of Quino checkerspot butterfly as a CESA candidate species and include any updated analyses to reflect the Plan's impact on floral resources, host plants, and habitat for Quino checkerspot butterfly.

Recommendation #4: Early Consultation for Quino checkerspot butterfly. Early consultation with CDFW is encouraged, as significant modification to potential proposed projects and mitigation measures may be required to obtain an ITP or a Consistency Determination if projects proposed in the Plan may impact Quino checkerspot butterfly.

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ADDITIONAL COMMENTS

COMMENT #5: Regional Funding Source

The *TransNet* Extension Ordinance and Expenditure Plan, approved countywide by voters in November 2004, includes an Environmental Mitigation Program (EMP) which is a funding allocation category for the costs to mitigate habitat impacts for regional transportation projects. This funding program is projected to expire in Fiscal Year 2028. The EMP is a unique component of the *TransNet* Extension in that it goes beyond traditional mitigation for transportation projects by including a funding allocation for habitat acquisition, management, and monitoring activities as needed to help implement the MSCP and MHCP, including subarea plans issued under these subregional planning efforts. This funding allocation is tied to mitigation requirements and the environmental clearance approval process for proposed transportation projects. Additionally, SANDAG has been discussing funding needs for planning and implementation of regional conservation efforts throughout San Diego County, including the monitoring and management of regional preserves. CDFW strongly supports the development of the Regional Funding Source to support implementation of the MSCP and MHCP, and it should be a critical component of the San Diego Forward program.

COMMENT #6:New commuter and light rail alignments

CDFW acknowledges that the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Commuter Rail Corridor Alignment, San Diego segment, Project is being analyzed through a separate CEQA document. CDFW provided comments on the Updated Notice of Preparation circulated on May 16, 2025, regarding our concerns with impacts to special status species, sensitive habitats, and conserved lands. The LOSSAN Project is disclosed in the DEIR, and it appears some segments may tier off the Plan EIR. Given the magnitude of potential impacts from the LOSSAN Project and the potential Boundary Line Adjustments or minor amendments that may be required pursuant to the City of San Diego's MSCP and County of San Diego's South County MSCP, CDFW requests early consultation with the Wildlife Agencies prior to public review of any subsequent project-level CEQA documents.

Recommendation #7: New commuter and light rail alignments proposed through the City and County of San Diego

CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies, the City of San Diego, and County of San Diego to design alignments that avoid sensitive resources and preserved lands**.**

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, §

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21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[3] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4].

SANDAG should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist SANDAG in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the SANDAG has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Katrina Rehrer[5], Senior Environmental Scientist (Specialist).

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[5] Phone: (310) 387-9260; Email: Katrina.rehrer@wildlife.ca.gov

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ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

Attachment B: MSCP core resource areas and linkages map

Attachment C: Fish passage locations

ec: California Department of Fish and Wildlife
Melanie Burlaza, Senior Environmental Scientist (Supervisory)
Katrina Rehrer, Senior Environmental Scientist (Specialist)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	**Timing**	**Responsible Party**
Recommendation #1: Recirculate with NCCP information. SANDAG should consider recirculating the DEIR to include additional information about the draft NCCPs in the Plan area and establishment of a Regional Funding Source. The recirculated DEIR should specify how the Plan and subsequent projects will have "no impact" in terms of conflict with draft and final NCCPs.	Prior to adoption of the final Environmental Impact Report	Lead Agency
Recommendation #2: The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 4.4-34 of the DEIR) as well as corresponding text on page 4.4-35 should be expanded to include certain omitted linkages prior to publication of the final EIR. Connectivity throughout the subregional MHCP and draft North and East County Plans should be included; for example, connections through Oceanside for coastal California gnatcatcher should be added to the map. The map is also missing the linkage along the I-15 through North County and there is no reference to it in the text. Additionally, it is not clear if Multi-Habitat Planning Areas (MHPA) on the map shown near the Border include the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep and whether this is included in the areas referenced in the text on page 4.4-32 under the Las Californias Binational Conservation Initiative section.	Prior to adoption of the final Environmental Impact Report	Lead Agency
Recommendation #3: Disclosure of potential impacts to Quino checkerspot butterfly.	Prior to adoption of the final	Lead Agency

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Mitigation Measure	Timing	Responsible Party
The EIR should be updated to reflect the status of Quino checkerspot butterfly as a CESA candidate species and include any updated analyses to reflect the Plan's impact on floral resources, host plants, and habitat for Quino checkerspot butterfly.	Environmental Impact Report	
Recommendation #4: Early Consultation for Quino checkerspot butterfly. Early consultation with CDFW is encouraged, as significant modification to potential proposed projects and mitigation measures may be required to obtain an ITP or a Consistency Determination if projects proposed in the Plan may impact Quino checkerspot butterfly.	Prior to project-level activities	Lead Agency
Recommendation #6: New commuter and light rail alignments CDFW acknowledges that the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Commuter Rail Corridor Alignment, San Diego segment, Project is being analyzed through a separate CEQA document. CDFW provided comments on the Updated Notice of Preparation circulated on May 16, 2025 regarding our significant concerns with impacts to sensitive species, habitats, and conserved lands. The overall LOSSAN Project is disclosed in the DEIR, and it appears some segments may tier off the Plan EIR. Given the magnitude of potential impacts from the LOSSAN Project and the potential Boundary Line Adjustments or minor amendments that may be required pursuant to the City of San Diego's MSCP and County of San Diego's South County MSCP, CDFW requests early consultation with the Wildlife Agencies prior to public review of any subsequent project-level CEQA documents.	Prior to public review of any subsequent project-level CEQA documents	Lead Agency
Recommendation #7: Recommendation #6: New commuter and light rail alignments proposed through the City and County of San Diego	Prior to public review of any subsequent	Lead Agency

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Mitigation Measure	**Timing**	**Responsible Party**
CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies, the City of San Diego, and County of San Diego to design alignments that avoid sensitive resources and preserved lands**.**	project-level CEQA documents	

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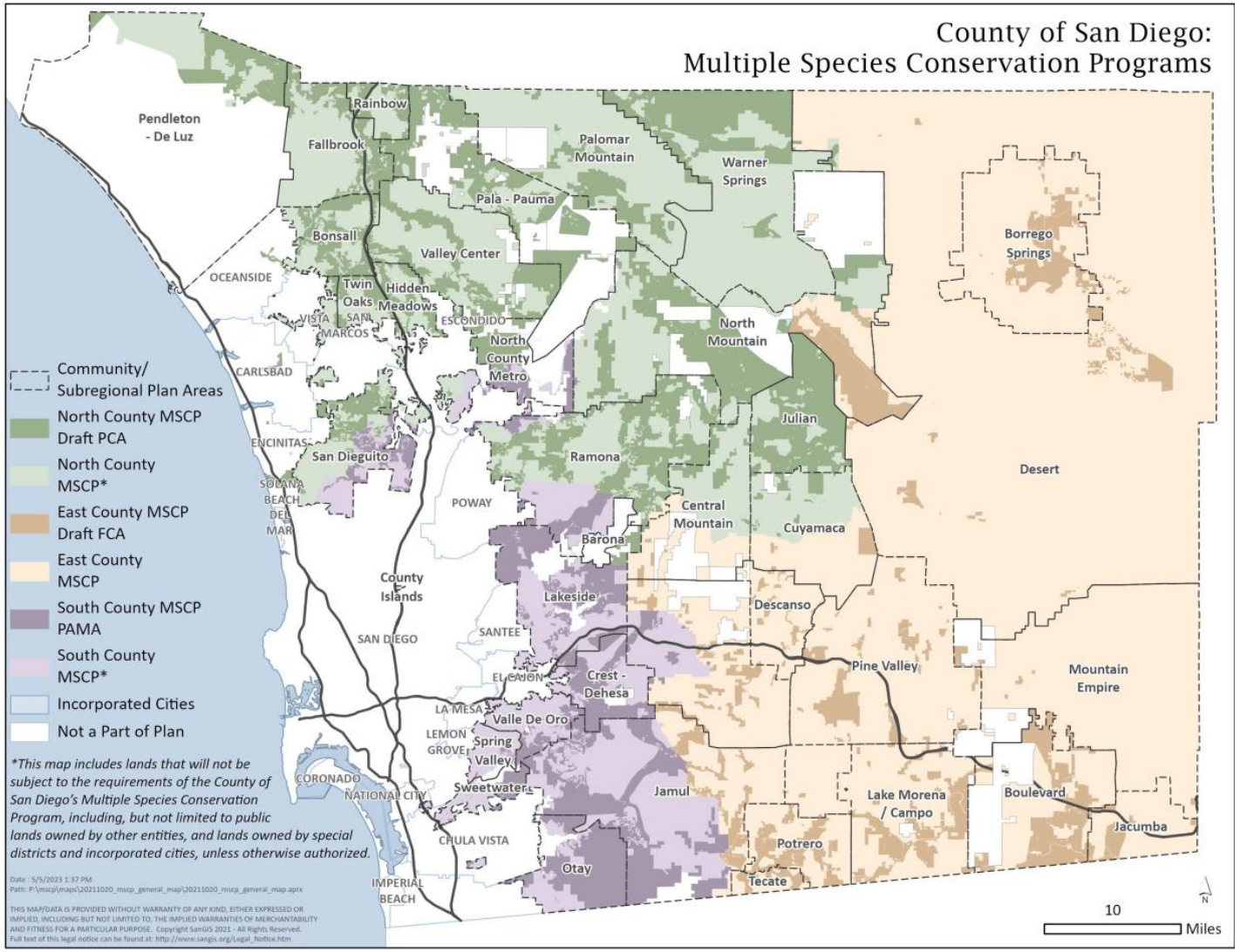

ATTACHMENT B: MSCP CORE RESCOURCE AREAS AND LINKAGES MAP

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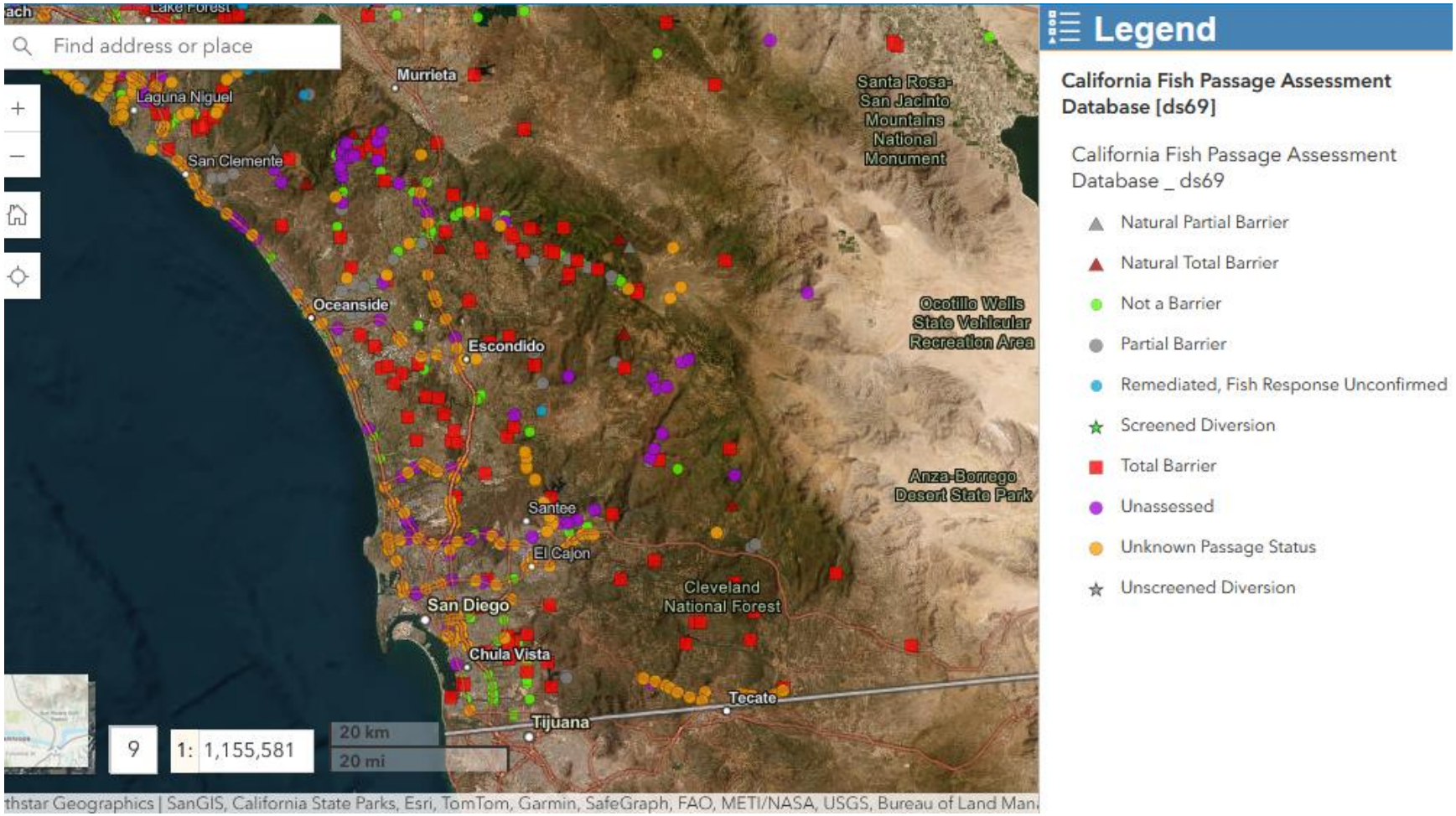

ATTACHMENT C: FISH PASSAGE LOCATIONS