



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



July 24, 2025

Christina Rios
City of Santee
10601 Magnolia Avenue
Santee, California 92071
crios@cityofsanteeca.gov

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CARLTON OAKS COUNTRY CLUB AND RESORT PROJECT, SCH NO. 2024060258, SAN DIEGO COUNTY, CA

Dear Christina Rios:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the City of Santee (City) for the Carlton Oaks Country Club and Resort (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on those aspects of the Project 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

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.

Christina Rios
City of Santee
July 24, 2025
Page 2 of 28

regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project 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 Project as proposed may result in "take" as defined by State law² 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 Project 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. The City is in the process of developing an NCCP/Habitat Conservation Plan Subarea Plan (Draft Santee SAP) under the San Diego Multiple Species Conservation Program (MSCP) Subregional Plan. The Draft Santee SAP has not yet been adopted by the City or permitted by the U.S. Fish and Wildlife Service (USFWS) or CDFW. The Project site is identified in the Draft Santee SAP as "Not a Part" and thus will not receive take coverage under the plan. A portion of the proposed Project also occurs within the City of San Diego's Multi-Habitat Planning Area (MHPA), which delineates core biological resource areas and corridors targeted for conservation under the City of San Diego's MSCP Subarea Plan (San Diego SAP; City of San Diego 1997).

PROJECT DESCRIPTION SUMMARY

Project Proponent: Alika, LLC

Lead Agency: City of Santee

Objective: The objective of the Project is to redevelop the existing Carlton Oaks Golf Course and Country Club into a recreation-oriented mixed-use resort community. The Project site currently consists of a golf course, country club with restaurant/bar, pro shop, 52-key hotel, and tournament hall.

Location: The Project site is located at 9200 Inwood Drive within the boundaries of the existing 165-acre Carlton Oaks Country Club, located in both the City of Santee and the City of San Diego. Offsite improvements are proposed on an additional 3.5 acres to the north and east of the Project site, for a total Project Area of 169 acres. Surrounding land uses include single- and multi-family residential development to the north and riparian habitat and open space associated with the San Diego River and two tributaries (Forester and Sycamore Canyon Creeks) to the east, south, and west. The North Channel of the San Diego River runs east to west through the Project site and the South Channel runs immediately adjacent to the southern boundary of the site.

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."

Christina Rios
City of Santee
July 24, 2025
Page 3 of 28

Timeframe: Construction of the proposed Project would occur in eight phases over approximately two years.

Project Description: The Project includes demolition and redesign of the existing golf course, updated and new golf-related resort amenities and associated improvements (Hotel and Clubhouse), two new residential neighborhoods (Residential North and Residential West), and public trail segments. The redesign of the golf course would include reshaping existing topography and ponds to improve drainage patterns on site. Access to the new Hotel and Clubhouse includes construction of a bridge (265 feet long and 36 feet wide) over the North Channel of the San Diego River from Residential North and an emergency access road through the Vista del Verde condominiums that requires a second river crossing upstream. Construction of Residential West and the Hotel and Clubhouse would involve elevating the grade of the development areas above the existing base flood³ elevation. Fill soil would be imported prior to construction and stored at a disposal site located on the eastern side of the Project site within the current driving range. Lastly, multipurpose public trail segments are proposed that would link to existing and planned trails (e.g., Carlton Oaks Golf Course Segment) to the east and west.

The proposed clubhouse, hotel, residential development, trail segments within the eastern portion of the site, and most of the golf course redesign would be within the City of Santee. A portion of the redesigned golf course (approximately 64 acres), driveway access to Residential West from West Hills Parkway, widening and restriping of West Hills Parkway, a landscape easement (approximately 0.4 acre) along the widened portion of West Hills Parkway, and a portion of a graded bench for future trail use in the southwestern portion of the site would be within the City of San Diego.

Biological Setting: The Project site is within the historic channel of the San Diego River. Aerial photos taken in 1953, before the construction of the current golf course, show the San Diego River occupying the majority of the proposed Project site (Nationwide Environmental Title Research n.d.). The Project site contains the confluences of Sycamore Creek with the North Channel of the San Diego River and Forester Creek with the South Channel of the San Diego River and receives flows from additional watersheds discharging into the San Diego River. The North and South Channels of the San Diego River converge at the downstream end of the Project site.

With the exception of the approximately 17.7-acre parcel (Assessor's Parcel Number (APN) 383-071-06-00) currently housing the clubhouse, hotel, and other facilities, most of the Project site is mapped within the 100-year flood plain and regulatory floodway of the San Diego River (Federal Emergency Management Agency n.d.). The proposed Residential West would be constructed outside the regulatory floodway, but within the 100-year floodplain. The golf course redesign and Hotel and Clubhouse (including two associated access roads) would be constructed within the regulatory floodway of the

³ "Base flood" means the flood having a one percent chance of being equaled or exceeded any given year. Also called the "100-year flood."

Christina Rios
City of Santee
July 24, 2025
Page 4 of 28

San Diego River. Additionally, the Project is located partially within San Diego SAP MHPA and is directly adjacent to City-owned Preserve Lands designated as Existing Protected Open Space in the Draft Santee SAP and serves as a vital wildlife corridor for the Draft Santee SAP.

Numerous natural resources mitigation sites also occur in the vicinity of the Project site. For example: a County of San Diego mitigation site (APN 383-060-25) and a Caltrans mitigation site (APN 383-060-28) are in the San Diego River downstream of the Project site. City of San Diego mitigation sites are in the south channel of the San Diego River immediately adjacent to the southern boundary of the golf course. The Carlton Oaks Conservation Easement and mitigation site (Mast West; APN 383-071-08) is immediately adjacent to the Project to the east, the Lowes Santee mitigation site (APN 383-070-62), Mast Park mitigation site (APN 381-040-24), and Edgemoor mitigation site (APNs 381-050-55, -57, -60, and -61) are in the San Diego River upstream of the Project site. Lastly, a Caltrans mitigation site is in Forester Creek just upstream of its entry onto the Project site.

As proposed the Project would result in permanent impacts to approximately 0.19 acre of Diegan coastal sage scrub habitat within City of San Diego. Within the City of Santee, 1.72 acres of sensitive upland and wetland/riparian habitat would be permanently impacted by the Project with an additional 3.13 acres of sensitive habitats temporarily impacted (Table 1). The entire Project site falls within USFWS-designated Critical Habitat for least Bell's vireo. Critical Habitat for San Diego ambrosia occurs off site to the west (U.S. Fish & Wildlife Service n.d.). Although a majority of the Project site is mapped as developed or developed-golf course, the wetland and riparian habitats located within and immediately adjacent to the site support a wide variety of plant and wildlife species. Sensitive species of concern known to occur on or in proximity to the Project site include⁴:

Plants:

- San Diego ambrosia (*Ambrosia pumila*; ESA-endangered, CRPR 1B.1)

Invertebrates:

- Crotch's bumble bee (*Bombus crotchii*; candidate CESA listing)

⁴ Nomenclature and species status follows the CNDDDB Special Animals List (CDFW, April 2025) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW, April 2025). ESA = Federal Endangered Species Act, BCC = Federal Bird of Conservation Concern, CESA = California Endangered Species Act, SSC = state Species of Special Concern, FP = state Fully Protected, WL = CDFW Watch List, CRPR = California Rare Plant Rank, MSCP-covered = Covered Species for City of San Diego MSCP.

Christina Rios
 City of Santee
 July 24, 2025
 Page 5 of 28

Amphibians:

- western spadefoot (*Spea hammondi*; SSC, proposed ESA-threatened)

Reptiles:

- orange-throated whiptail (*Aspidocelis hyperythra hyperythra*: WL)
- two-striped garter snake (*Thamnophis hammondi*; SSC)

Birds:

- coastal California gnatcatcher (*Polioptila californica californica*; SSC, ESA-threatened)
- Cooper’s hawk (*Accipiter cooperi*: WL)
- double-crested cormorant (*Nannopterum auritum*; WL), nesting colony (i.e., rookery)
- least Bell’s vireo (*Vireo bellii pusillus*; CESA-endangered, ESA-endangered)
- tricolored blackbird (*Agelaius tricolor*; CESA-threatened, BCC)
- vermilion flycatcher (*Pyrocephalus rubinus*; SSC)
- white-tailed kite (*Elanus leucurus*; FP)
- yellow warbler (*Setophaga petechia*; SSC)
- yellow-breasted chat (*Icteria virens*; SSC)

Mammals:

- southern mule deer (*Odocoileus hemionus ssp. fuliginatus*; MSCP-covered)

Table 1: Impacts to sensitive habitats within the City of Santee

Sensitive Habitat Type	Permanent Impact (acres)	Temporary Impact (acres)	Total (acres)
Diegan coastal sage scrub	0.41		0.41
Nonnative grassland	0.01		0.01
Disturbed wetland	0.12		0.12
Freshwater		2.43	2.43
Freshwater marsh		0.56	0.56
Mule fat scrub	0.34	0.02	0.36
Southern cottonwood-willow riparian forest	0.80	0.07	0.87
Nonnative riparian	0.04	0.05	0.09
Total impacts to sensitive habitats within City of Santee	1.72	3.13	4.85

Christina Rios
City of Santee
July 24, 2025
Page 6 of 28

Project History: CDFW previously submitted a comment letter in response to the Notice of Preparation (NOP) of a DEIR for the Project on July 8, 2024. Our previous comments included recommendations that the DEIR include a thorough evaluation of impacts to the San Diego River floodplain and floodway, buffers to sensitive riparian resources in the project design, surveys for Crotch's bumble bee, analyses of impacts to wildlife movement and connectivity, and the proposed Project's consistency with both the Draft Santee SAP and San Diego SAP.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENT # 1: Floodway Encroachment

Issue: The proposed location of the Hotel and Clubhouse development area and associated access roads would encroach into the regulatory floodway of the San Diego River (Figure 3.9-2 of the DEIR).

Specific impact: Development within the regulated floodway may create a potentially significant constriction to the San Diego River corridor in addition to the establishment of a major pinch point on the confluence with Sycamore Canyon Creek. Proposed efforts to protect development from these effects include bank armoring and other stabilization techniques, which can further impact stream functions. These activities may have cascading impacts that could degrade adjacent mitigation lands, including a CDFW-held conservation easement located upstream.

The Flood Study and Drainage Report appendices to the DEIR (Appendices L and J1, respectively) conclude the Project would not have a significant impact on base flood elevations within and adjacent to the Project site and would not result in a net increase of flows from the development. However, the analyses of potential impacts and post-project conditions do not include all potential effects. CDFW remains concerned the Project may result in changes to stream function both upstream and downstream of the Project that could negatively impact nearby natural resource mitigation sites within the San Diego River.

Why impact would occur: Reducing the available cross section of the floodplain and floodway by introducing fill to raise the development area above the floodplain can lead to increased flooding, changes to sediment transport, increased velocity, and increased scour and erosion. Changes to velocity, erosion, or sediment transport can result in aggradation and degradation of stream beds extending far up and down stream of Project activities. Variations in stream elevations or flow patterns could result in impacts to upstream and downstream aquatic, wetland, and riparian habitats, including those associated with the many restoration and mitigation sites adjacent to the Project site.

Christina Rios
City of Santee
July 24, 2025
Page 7 of 28

Evidence impact would be significant: Any changes to the hydrology of the San Diego River and tributaries, and related potential impacts on biological resources, should be analyzed and disclosed in the Final EIR. CEQA Guidelines Section 15126.2 further requires the DEIR to evaluate the potentially significant direct, indirect, or cumulative environmental impacts of locating development in floodplains. Lastly, legally protected lands providing mitigation for past projects and contributing to the San Diego SAP and draft Santee SAP preserves may be indirectly impacted by Project-related changes to the San Diego River corridor. For example, the Mast West mitigation site has a recorded conservation easement with CDFW as the grantee. Conservation easements are a unique property interest created by statute for the purpose of retaining land “...predominantly in its natural, scenic, historical, agricultural, forested, or open-space condition” (Civ. Code § 815.1). By statute, a conservation easement is permanent – it runs with the land and is binding on subsequent owners of the underlying property (Civ. Code §815.2). Project impacts on the Mast West conservation easement are prohibited by the conservation easement deed.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final EIR:

Recommendation #1: Additional modeling and analysis. CDFW recommends the City require additional modeling and analysis to determine the potential of the Project to result in changes to important stream functions at least one mile upstream and one mile downstream from the boundaries of the Project site. The expanded analysis should be included in the Final EIR. If potential impacts to existing conserved lands are identified, the Final EIR should include measures to avoid, minimize, or mitigate those impacts.

COMMENT # 2: Stream and Wetland Impacts

Issue: The Project proposes a substantial amount of grading in stream, wetland, and riparian areas subject to CDFW’s regulatory authority under Fish and Game Code Section 1600 *et seq.* that may not be adequately described in the DEIR.

Specific impact: The DEIR delineates CDFW stream resources based on evidence of wracking, scour, and sediment deposition characteristics which are currently removed by maintenance of the active golf course. Adequate disclosure under CEQA is necessary for CDFW to assist in identifying, avoiding, and/or mitigating a project’s significant, or potentially significant, direct, and indirect impacts on biological resources, including those subject to CDFW’s regulatory authority under Fish and Game Code Section 1600 *et seq.*

Why impact would occur: Accurate delineation of a Project’s impacts is required to identify the appropriate level of mitigation to adequately offset those impacts. In CDFW’s July 8, 2024, comment letter on the NOP, we provided recommendations for delineating the limits of CDFW stream resources. While low flows may be confined to

Christina Rios
City of Santee
July 24, 2025
Page 8 of 28

distinct channels running through the Project site, storm events likely produce flows that overtop the banks of these low flow channels and occupy a larger area. In a natural system, evidence of these overbank flows would accumulate over time, more clearly delineating the lateral extent of the stream. However, routine maintenance of active golf course areas can remove evidence of wracking, sediment deposition, changes in topography, and scour of vegetation. Delineation methodologies that rely on the presence of such evidence are not appropriate for the Project site and may underestimate the extent of CDFW-regulated streambed and riparian resources.

In addition, the DEIR is vague in how unavoidable impacts to wetland and riparian resources will be adequately mitigated. As directed by Fish and Game Commission policies, CDFW strongly discourages development in or conversion of wetlands unless, at a minimum, Project mitigation assures there will be no net loss of wetland habitat values or acreage (MM-BIO-3).

Evidence impact would be significant: CDFW exercises its regulatory authority as provided by Fish and Game Code Section 1600 *et seq.* to conserve fish and wildlife resources which include rivers, streams, or lakes and associated natural communities. Fish and Game Code Section 1602 requires any person, state or local governmental agency, or public utility to submit a Lake and Streambed (LSA) Notification to CDFW prior to beginning any activity that will do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires an LSA Agreement when a project activity may substantially adversely affect fish and wildlife resources. Information regarding submittal of an LSA Notification may be obtained by accessing the [Lake and Streambed Alteration Program website](#)⁵. Verification of the limits of CDFW's jurisdiction is subject to review of the written notification. The Project may result in significant impacts on streams and associated natural communities if development of sites identified by the Project would be near these resources. Without appropriate mitigation, the Project may have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

Furthermore, public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021).

⁵ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

Christina Rios
City of Santee
July 24, 2025
Page 9 of 28

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the Final EIR:

Recommendation #2: Wetland impact avoidance. CDFW recommends the City consider a project alternative that avoids impacts to aquatic and riparian resources to the maximum extent feasible, such as *Alternative 2 - Reduced Project Alternative* described in the DEIR. If avoidance is not possible, the Final EIR should clearly detail the location and type of wetland mitigation (i.e., creation, enhancement, or restoration) and how these mitigation sites will be protected and managed in perpetuity. If the Project will result in impacts to resources subject to Section 1600 *et seq.* of the Fish and Game Code, submittal of an LSA Notification will be required. CDFW recommends all areas occurring within the mapped floodplain be considered subject to CDFW's regulatory authority under Fish and Game Code Section 1600 *et seq.*, as described in our comments on the NOP.

COMMENT # 3: Wildlife Connectivity and Movement

Issue: Conversion of large portions of the existing golf course into residential and resort development and fencing along the proposed trail segments will significantly impact wildlife connectivity and movement along the San Diego River corridor and may result in wildlife mortality. The San Diego River corridor is critical for wildlife movement and habitat connectivity within the Draft Santee SAP.

Specific impact: Per the Biological Survey Report (BSR; ICF, May 2025), Residential North would replace a portion of the existing golf course with residential development that will reduce the open cross section of the existing San Diego River corridor by nearly half. Likewise, development of the Hotel and Clubhouse will bisect the river corridor at the confluence of the San Diego River and Sycamore Canyon Creek, thereby creating two narrower corridors with development on either side (BSR, Figure 12). In addition, Section 2.4.6 (*Project Trail Segments*) of the DEIR states the portion of the San Diego River Trail proposed along both the eastern-southeastern and western boundary of the golf course will be lined by an approximately 10-foot chain link safety fence, which can result in direct impacts to wildlife including entrapment and mortality. These collective impacts may significantly alter wildlife connectivity at the local level.

Why impact would occur: Several components of the Project (e.g., residential developments and resort facility) will introduce new, high-intensity uses where low-intensity uses (golf course) currently exist. The golf course, which is currently unoccupied and unlit at night, serves as a part of the movement corridor and provides additional wildlife movement function along the San Diego River corridor. Conversion of areas of the golf course into residential and resort development will diminish this function significantly, potentially leading to functional severance or substantial reduction in ecological function. The redesign and construction of the golf course itself would also temporarily impact this function.

Christina Rios
City of Santee
July 24, 2025
Page 10 of 28

Lastly, the DEIR does not analyze potential impacts to wildlife movement from fencing that would impede wildlife movement along the boundary of the golf course and proposed trail segments; mammals and low-flying birds may not see a wire fence clearly against the landscape. Birds can collide with fences, breaking wings, impaling themselves on barbs, and tangling in wires. Large, low-flying birds such as ducks, geese, cranes, grouse, hawks, and owls are especially vulnerable. Waterfowl can fly into fences near or across waterways, and low-flying hawks and owls may careen into fences when swooping in on prey. CDFW disagrees with the wildlife corridor analysis assumption that some functions of the re-designed golf course for wildlife movement supports a finding of less than significant impact. This function could potentially be removed and/or hampered if portions of the golf course boundary along the San Diego River were to be fenced. Such impacts to the wildlife corridor could adversely affect species movement, population size and diversity, and overall ecosystem health.

Evidence impact would be significant: The Project may interfere with the movement of wildlife and thus has the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §§ 15065, 15380). As a result, the Project will have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Additionally, under CEQA Guidelines Appendix G, Section IV(b), projects that substantially affect sensitive natural communities or disrupt wildlife movement are considered significant. Furthermore, California Fish and Game Code Sections 1955-1958 and 1930.5 underscore the State's commitment to preserving wildlife connectivity and habitat corridors, thus highlighting the importance of maintaining ecological linkages.

Lastly, while the Project site is designated as "Not a Part" in the Draft Santee SAP, the SAP tiers off the MSCP and must meet the conservation goals and objectives of the MSCP. The Project would impact land designated as Core Biological Resource Area in the San Diego MSCP, which delineates areas with high biological value for regional conservation. This designation acknowledges the San Diego River corridor's importance in providing breeding, sheltering, foraging, and dispersal functions for local wildlife within the Mission Trails/Kearny Mesa/East Elliott/Santee conservation unit. Impingement of the corridor and possible loss of ecological function is inconsistent with the conservation strategy of the MSCP. Any constraints or impacts (direct or indirect) to the San Diego River corridor would be regionally significant.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the Final EIR:

Christina Rios
City of Santee
July 24, 2025
Page 11 of 28

Recommendation #3: Wildlife movement corridors. The San Diego River corridor through the City is a key component for wildlife movement between conserved areas to the east and west, particularly for birds and mammals. CDFW recommends the City consider a project alternative that does not reduce the width of the San Diego River wildlife movement corridor, such as *Alternative 2 - Reduced Project Alternative* described in the DEIR. CDFW also recommends the Final EIR include an analysis of cumulative impacts to wildlife movement through the San Diego River corridor from the Project and other planned and active development within the City limits upstream of the site. The analysis should consider potential impacts to the wildlife connectivity goals and objectives of the Draft Santee SAP, which rely on the San Diego River corridor to provide a functional east-to-west linkage through the Plan Area and between conserved lands to the east and west. If narrowing the corridor is necessary, the Final EIR should include measures to mitigate significant impacts on local wildlife movement. Potential measures include enhancement of avoided areas to support wildlife movement and/or removal of existing barriers to movement.

Recommendation #4: Fencing along trail segments. CDFW recommends the Final EIR include an analysis of potential changes to the function of the Project site post-construction for wildlife movement that considers the impacts of impermeable fencing along portions of the proposed trail segments bordering the golf course. If potentially significant impacts to the function of the onsite wildlife corridor are identified, the Final EIR should include measures to avoid and/or mitigate Project impacts to the San Diego River wildlife corridor (including alternate fencing options that meet safety requirements but also allow for wildlife passage).

COMMENT # 4: Crotch's Bumble Bee

Issue: The Project may adversely impact Crotch's bumble bee (CBB).

Specific impact: The Project may result in permanent and/or temporal loss of suitable nesting, foraging, and overwintering habitat for CBB. Direct impacts from ground disturbing activities may include death or injury of adults, eggs, and larva, as well as cause burrow collapse, nest abandonment, and reduced nest success. While CDFW appreciates the inclusion of a mitigation measure to address these impacts, MM-BIO-15 (*Crotch's bumble bee Pre-construction Surveys*) is not sufficient to ensure complete avoidance of Crotch's bumble bee. While the measure requires avoidance of CBB nests it does not protect foraging individuals if found onsite.

Why impact would occur: Suitable nesting, foraging, and overwintering habitat for CBB exists within the Project site and focused survey results are inconclusive. CBB primarily nests in late February through late September in underground abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, beneath brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). CBB forages on a variety of flowering plants, including exotic and ornamental plant species. Overwintering sites utilized by CBB

Christina Rios
City of Santee
July 24, 2025
Page 12 of 28

queens include soft, disturbed soil (Goulson 2010) or under leaf litter or other debris (Williams, et al. 2014). Ground disturbance from grading and vegetation removal during the overwintering period may inadvertently impact nests or cause mortality of overwintering queens through crushing, burrow destruction, or loss of foraging habitat. These actions could reduce breeding success or lead to nest abandonment or failure, potentially resulting in take under CESA.

The DEIR indicates focused surveys conducted for CBB in August 2024 were negative. However, based on information provided in the DEIR the surveys did not adhere to the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (California Department of Fish and Wildlife 2023) as recommended in our comments on the NOP. The survey visits were conducted less than two weeks apart and were concentrated in August at the end of the Colony Activity Period. As such, it is not possible to presume the Project site is not occupied by CBB.

Evidence impact would be significant: The California Fish and Game Commission accepted a petition to list CBB as threatened or endangered under CESA, determining the listing “may be warranted” and advancing the species to the candidacy stage of the CESA listing process. As a result of advancement, Crotch’s bumble bee is granted full protection under CESA. 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).

In addition, CBB has a State ranking of S1/S2. This means CBB is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). CESA-listed species and their habitats meet the definition of endangered, rare, or threatened under CEQA (CEQA Guidelines § 15380). Without adequate survey results, impacts to CBB and its habitat may result in a mandatory finding of significance because the Project has the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the Final EIR:

Recommendation #5: Updated focused surveys. CDFW recommends the Project proponent repeat the focused surveys for CBB following the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, released by CDFW on June 6, 2023, with results included in the Final EIR to properly disclose potential impacts on CBB pursuant to CEQA. The Project proponent should consult with CDFW prior to conducting the focused surveys to ensure survey methodology will yield valid results. If the focused survey results conclude the presence of CBB, the Final EIR should include a discussion of the results with sufficient detail such that a CESA Incidental Take Permit can be issued based on the analysis provided in the DEIR.

Christina Rios
City of Santee
July 24, 2025
Page 13 of 28

Recommendation #6: Compensatory mitigation for impacts to suitable CBB habitat.

The Final EIR should specify appropriate compensatory mitigation for Project impacts on suitable CBB habitat. Such mitigation may be fulfilled through the Project's proposed mitigation for impacts on nonnative grassland and Diegan coastal sage scrub habitats (MM-BIO-1 and MM-BIO-2).

CDFW requests the following mitigation measure be incorporated into the Final EIR in place of MM-BIO-15:

Mitigation Measure #1: Crotch's bumble bee.

Prior to issuance of a grading permit, a pre-construction survey shall be conducted by a qualified biologist to ensure no nests or Crotch's bumble bee individuals are located within the construction area. The pre-construction survey shall include (1) a habitat assessment and (2) focused surveys, both of which shall be based on recommendations described in the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, released by CDFW on June 6, 2023, or the most current version at the time of construction. The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat onsite including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls and rubble. The habitat assessment shall be repeated prior to February 1st each year ground-disturbing activities occur to determine if nesting resources are present within the impact area. If suitable nesting, foraging, and/or overwintering resources are present in the impact area, focused surveys to determine species presence or absence within the proposed area of disturbance shall be conducted.

Focused surveys shall be performed by a biologist with expertise in surveying for bumble bees and authorized under a CESA Memorandum of Understanding (MOU). The survey shall include at least three survey passes spaced two to four weeks apart. The timing of these surveys shall coincide with the Colony Active Period (April 1 through August 31). Surveys may occur between one hour after sunrise and two hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, rainy, or drizzling) and surveyors shall wait at least one hour following rain. Optimal surveys are those conducted when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 mph). Within any potential habitat suitable for CBB, the biologist shall survey for foraging and nest resources suitable for bumble bee use. Ensuring all nest resources receive 100 percent visual coverage, the biologist shall watch the nest resources for up to five minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after five minutes of observation. If a worker bumble bee

Christina Rios
City of Santee
July 24, 2025
Page 14 of 28

is detected, then a representative shall be identified by species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100 percent visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar to verify nest activity (no longer than 30 minutes).

A written survey report shall be submitted to the City and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the permits, authorizations, and/or qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. Survey results are considered valid until the start of the next Colony Active Period.

If Crotch's bumble bee nests or individuals are not detected during focused surveys, no further mitigation is required. If nesting or floral resources occupied by Crotch's bumble bee are detected within the construction area, the biologist shall notify and consult with CDFW to determine whether Project activities would result in impacts to Crotch's bumble bee, in which case, an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to issuance of a Grading Permit, Demolition Plans/Permits and Building Plans/Permits. All necessary permit conditions shall be fulfilled prior to initiation of Project activities. In the event an ITP is needed, mitigation for direct impacts to Crotch's bumble bee shall be determined through the ITP process. 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; California Code of Regulations, Title 14, Section 786.9).

COMMENT # 5: Least Bell's Vireo

Issue: The Project will impact riparian habitat occupied by least Bell's vireo.

Specific impact: CDFW is concerned about potential Project-related effects to least Bell's vireo-occupied breeding habitat within the San Diego River, Sycamore Canyon Creek, and Forester Creek (Figure 3.3-3 of DEIR). The proposed Project would significantly increase human activity adjacent to occupied riparian habitats on the western and northeastern portions of the site as existing golf course is converted to residential and resort development. Potential impacts include increased noise levels, nighttime lighting, increased predation by domestic animals, introduction of invasive species, and water quality impacts.

Why impact would occur: The BSR indicates least Bell's vireo was observed (including nesting activity) at multiple locations throughout the Survey Area during

Christina Rios
City of Santee
July 24, 2025
Page 15 of 28

protocol-level surveys conducted in 2019 and 2022. As a result, the DEIR considers all suitable habitat on site occupied by least Bell's vireo, except for an isolated 0.37-acre patch of riparian habitat immediately west of the current clubhouse that would be permanently impacted by the proposed Residential North development. Multiple observations of least Bell's vireo are recorded within the riparian habitat between the proposed Residential North and Hotel and Clubhouse. As proposed, there are no discernable buffers between riparian resources and the western end of Residential West, the eastern and southern boundaries of Residential North, and the northern and western boundaries of the Hotel and Clubhouse.

Least Bell's vireo were abundant and widespread in the U.S. until the 1950s (Grinnell and Miller 1944). By the 1960s, they were considered scarce (Monson 1960), and by 1980, there were fewer than 50 pairs remaining (Edwards 1980), although this number had increased to 2,500 by 2004 (Kus and Whitfield 2005). The primary cause of decline for this species has been the loss and alteration of riparian woodland habitats (USFWS 2006). Fragmentation of their preferred habitat has also increased their exposure to brown-headed cowbird (*Molothrus ater*) parasitism (Kus 2002). Current threats to their preferred habitat include colonization by non-native plants such as *Arundo donax* and altered hydrology (e.g., diversion, channelization, etc.) (USFWS 2006). Based on the foregoing, direct and indirect Project impacts would potentially substantially reduce the number of least Bell's vireos.

Evidence impact would be significant: Consistent with CEQA Guidelines § 15380, the status of least Bell's vireo as an endangered species pursuant to the federal ESA (16 U.S.C. § 1531 et seq.) and CESA (Fish & G. Code, § 2050 et seq.) qualifies it as an endangered, rare, or threatened species under CEQA. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met. If the Project may result in take of least Bell's vireo or lead to potential nest abandonment, a CESA permit will be needed. Authorization from CDFW may include an ITP or a consistency determination (CD) (Fish & G. Code §§ 2080.1, 2081, subds. (b), (c)). Requirements to meet the CESA 'fully mitigated standard' may differ from federal requirements, so early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. In order for CDFW to rely on the City's EIR in issuing take authorization for the Project, the DEIR should address all Project impacts to CESA-listed species and specify a mitigation, monitoring, and reporting program with sufficient detail and resolution to satisfy the requirements of a CESA ITP.

In addition to the Federal Migratory Bird Treaty Act of 1918 (50 C.F.R. Section 10.13), the California Fish and Game Code Sections 3503, 3503.5, and 3513 require the avoidance of the incidental loss of eggs or nestlings, or activities that lead to nest abandonment (Fish & G. Code, § 3503, 3503.5, and 3513 et seq.).

Christina Rios
City of Santee
July 24, 2025
Page 16 of 28

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the Final EIR:

Recommendation #7: Riparian buffers. CDFW considers adverse impacts to a species protected by CESA, such as least Bell's vireo, to be significant. CDFW recommends the City consider a project alternative that includes a minimum of 100-foot riparian conservation buffers between the edge of riparian habitat associated with the San Diego River and Sycamore Canyon Creek and proposed development areas. The buffer should be managed for conservation values with limited public access and use. Appropriately managed buffers between development and riparian habitats serve numerous functions for riparian habitat and the species they support. The buffers should provide for expansion of the habitat's biological values, protection from direct and indirect disturbance by humans and domestic animals and reduce edge effects. Buffers can help to mitigate the effects of noise, artificial light, line-of-sight disturbances, and invasive species.

If 100-foot riparian buffers are not feasible, the Final EIR should include buffers of lesser widths along with rationale as to how reduced buffers would still avoid significant adverse impacts to occupied least Bell's vireo breeding habitat based on site-specific information related to construction and subsequent human use of the development.

COMMENT # 6: Double-crested Cormorant Rookery

Issue: The Project may have both short-term and long-term impacts on a double-crested cormorant breeding colony not adequately analyzed by the DEIR.

Specific impact: A double-crested cormorant breeding colony, or rookery, occurs within the golf course redesign impact area in a eucalyptus tree just south of a large pond associated with the North Channel of the San Diego River (Figure 7 of BSR). Potential long-term impacts on this rookery are not analyzed by the DEIR. In addition, the DEIR does not consider potential impacts to foraging habitat and food availability from dewatering the pond area directly adjacent to the rookery during construction.

Why impact would occur: Disruption or loss of breeding at this rookery would have a significant impact on a wildlife nursery site. Per the [San Diego County Bird Atlas](https://sdplantatlas.org/BirdAtlas/BirdPages.aspx)⁶ this rookery represents a rare example of a breeding population of double-crested cormorant, a CDFW Watch List species, within San Diego County. Birds return to the site annually to nest and raise young. Although the DEIR states the eucalyptus trees would not be removed during grading of the golf course, construction noise and activity has the potential to temporarily disrupt breeding activities. Significant impacts from increased levels of activity and human presence associated with the proposed

⁶ <https://sdplantatlas.org/BirdAtlas/BirdPages.aspx>

Christina Rios
City of Santee
July 24, 2025
Page 17 of 28

Residential North and Hotel and Clubhouse developments located to the north and east of the rookery site may permanently impact the rookery.

Evidence impact would be significant: Section 3503 of the Fish and Game Code states it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by the code. Furthermore, CEQA Environmental Checklist IV(d) requires full disclosure of potential impacts that may impede the use of a “wildlife nursery site.” The Project has the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §§ 15065, 15380). Inadequate avoidance, minimization, and mitigation measures for impacts to special status species will result in the Project having a significant adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the Final EIR:

Recommendation #8: Additional impact analysis for rookery. To fully disclose potential impacts to a “wildlife nursery site” under CEQA (CEQA Environmental Checklist IV(d)), CDFW recommends the Final EIR include the following additional information and analysis for the existing double-crested cormorant rookery:

- i. Number of trees included in the rookery, total number of nests, and estimated number of birds using the rookery.
- ii. Presence or absence of birds at the rookery site outside the nesting season (conservatively April 1 through July 31).
- iii. An analysis of potential impacts to foraging habitat during the breeding season, particularly from dewatering of the pond north of the rookery site.
- iv. An analysis of potential indirect impacts to the rookery resulting from new high intensity uses near the rookery site associated with the Residential North and Hotel and Clubhouse developments.

Mitigation Measure #2: Double-crested cormorant rookery. MM-BIO-12 of the DEIR includes a suggested 150-foot “noise impact area” buffer to be established around the double-crested cormorant rookery. However, given the unique status of the rookery CDFW recommends an additional mitigation measure specific to the double-crested cormorant rookery be included in the Final EIR as outlined below:

Construction activities associated with grading, clearing and grubbing, and adjacent tree removal within 500 feet of the double-crested cormorant rookery shall not occur during the typical nesting season (April 1 through July 31). Before initiation of construction activities outside of the typical nesting season (August 1 through March 31), a qualified

Christina Rios
City of Santee
July 24, 2025
Page 18 of 28

biologist shall survey for active breeding activities at the rookery no more than three days prior to the start of construction. If breeding activities are observed at the rookery site, then no construction activities shall be allowed within 500 feet of the rookery until the breeding season has ended, and nests are no longer active (i.e., young have fledged and are no longer dependent on the parents). Completion of the breeding season shall be determined by a qualified biologist. While the rookery is active, the qualified biologist will monitor the rookery for any signs of disruption to breeding activities by ongoing construction activities (e.g., adults appearing agitated, leaving the nest more than average, etc.). If the qualified biologist determines breeding activities are disrupted, the avoidance buffer shall be expanded until the disruption is no longer observed.

Additional Comments

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's Final EIR include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

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, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)⁷ provides directions on 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](#)⁸.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination

⁷ <https://wildlife.ca.gov/Data/CNDDDB>

⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Christina Rios
City of Santee
July 24, 2025
Page 19 of 28

by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the 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 the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response the City 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 Heather Schmalbach⁹, Senior Environmental Scientist (Specialist).

Sincerely,

Signed by:

AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife

Glen M. Lubcke, Environmental Program Manager
Melanie Burlaza, Senior Environmental Scientist (Supervisory)
Heather Schmalbach, Senior Environmental Scientist (Specialist)

U.S. Fish and Wildlife Service

Jonathan Snyder, Jonathan_D_Snyder@fws.gov

Office of Planning and Research

State.Clearinghouse@opr.ca.gov

⁹ Phone: 858-775-7399; Email: Heather.Schmalbach@wildlife.ca.gov

Christina Rios
City of Santee
July 24, 2025
Page 20 of 28

REFERENCES

- California Department of Fish and Wildlife. 2023. "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species."
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.
- City of San Diego. 1997. "Multiple Species Conservation Program City of San Diego Subarea Plan."
https://www.sandiego.gov/planning/work/biodiversity#mscp_program.
- Edwards, C. L. 1980. A report on the distribution, population trends and habitat trends and habitat requirements of the Bell's vireo on the Lower Colorado River. Yuma District Office of the Bureau of Land Management, Arizona Fish and Game Department, Yuma, AZ, USA.
- Federal Emergency Management Agency. n.d. *FEMA Flood Map Service Center: Search by Address*. Accessed June 27, 2024.
<https://msc.fema.gov/portal/search?AddressQuery=carlton%20oaks%20drive%20C%20santee%20ca> .
- Federal Migratory Bird Treaty Act (MBTA) of 1918(50 C.F.R. Section 10.13).
- Goulson, D. 2010. *Bumblebees: Behaviour, Ecology, and Conservation*. New York, NY: Oxford University Press.
- Grinnell, J., and A. H. Miller. 1944. The Distribution of Birds of California. Pacific Coast Avifauna 27. Cooper Ornithological Club, Berkeley, CA, USA.
- Hatfield, R, S Jepsen, E Mader, S H Black, and M Shepherd. 2012. *Conserving Bumble Bees Guidelines for Creating and Managing Habitat for America's Declining Pollinators*. Portland, OR: The Xerces Society for Invertebrate Conservation.
- Kus, B. 2002. Least Bell's Vireo (*Vireo bellii pusillus*). In The Riparian Bird Conservation Plan: a strategy for reversing the decline of riparian-associated birds in California. California Partners in Flight.
http://www.prbo.org/calpif/htmldocs/riparian_v-2.html
- Kus, B. E., and M. J Whitfield. 2005. Parasitism, productivity, and population growth: Response of least Bell's vireos (*Vireo bellii extimus*) and Southwestern Willow Flycatchers (*Empidonax traillii extimus*) to cowbird (*Molothrus* spp.) control. *Ornithological Monographs* 57:16–27
- Monson, G. 1960. The nesting season. Southwest Regional Report, Audubon Field Notes 14:469.

Christina Rios
City of Santee
July 24, 2025
Page 21 of 28

Nationwide Environmental Title Research. n.d. *Historic Aerials; online viewer*. Accessed July 2, 2024. <https://historicaerials.com/viewer>.

U.S. Fish & Wildlife Service. n.d. *Critical Habitat for Threatened & Endangered Species [USFWS]*. Accessed July 1, 2024.
<https://fws.maps.arcgis.com/apps/mapviewer/index.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>.

U.S. Fish and Wildlife Service [USFWS]. 2006. Least Bell's vireo 5-year review: summary and evaluation. USFWS, Carlsbad, CA, USA.

Williams, P H, R W Thorp, L L Richardson, and S R Colla. 2014. *Bumble Bees of North America: An Identification Guide*. Princeton University Press.



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



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
<p>Recommendation #1: <u>Additional modeling and analysis.</u> CDFW recommends the City require additional modeling and analysis to determine the potential of the Project to result in changes to important stream functions at least one mile upstream and one mile downstream from the boundaries of the Project site. The expanded analysis should be included in the Final EIR. If potential impacts to existing conserved lands are identified, the Final EIR should include measures to avoid, minimize, or mitigate those impacts.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Recommendation #2: <u>Wetland impact avoidance.</u> CDFW recommends the City consider a project alternative that avoids impacts to aquatic and riparian resources to the maximum extent feasible, such as <i>Alternative 2 - Reduced Project Alternative</i> described in the DEIR. If avoidance is not possible, the Final EIR should clearly detail the location and type of wetland mitigation (i.e., creation, enhancement or restoration) and how these mitigation sites will be protected and managed in perpetuity. If the Project will result in impacts to resources subject to Section 1600 <i>et seq.</i> of the Fish and Game Code, submittal of an LSA Notification will be required. CDFW recommends all areas occurring within the mapped floodplain be considered subject to CDFW’s regulatory authority under Fish and Game Code Section 1600 <i>et seq.</i>, as described in our comments on the NOP.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

Christina Rios
 City of Santee
 July 24, 2025
 Page 23 of 28

<p>Recommendation #3: <u>Wildlife movement corridors.</u> The San Diego River corridor through the City is a key component for wildlife movement between conserved areas to the east and west, particularly for birds and mammals. CDFW recommends the City consider a project alternative that does not reduce the width of the San Diego River wildlife movement corridor, such as <i>Alternative 2 - Reduced Project Alternative</i> described in the DEIR. CDFW also recommends the Final EIR include an analysis of cumulative impacts to wildlife movement through the San Diego River corridor from the Project and other planned and active development within the City limits upstream of the site. The analysis should consider potential impacts to the wildlife connectivity goals and objectives of the Draft Santee SAP, which rely on the San Diego River corridor to provide a functional east-to-west linkage through the Plan Area and between conserved lands the east and west. If narrowing of the corridor is necessary, the Final EIR should include measures to mitigate significant impacts to local wildlife movement. Potential measures include enhancement of avoided areas to support wildlife movement and/or removal of existing barriers to movement.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Recommendation #4: <u>Fencing along trail segments.</u> CDFW recommends the Final EIR include an analysis of potential changes to the function of the Project site for wildlife movement post-construction that considers the impacts of impermeable fencing along portions of the proposed trail segments bordering the golf course. If potentially significant impacts to the function of the onsite wildlife corridor are identified, the Final EIR should include measures to avoid and/or mitigate Project impacts to the San Diego River wildlife corridor (including alternate fencing options that meet safety requirements but also allow for wildlife passage).</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Recommendation #5: <u>Updated focused surveys.</u> CDFW recommends the Project proponent repeat the focused surveys for CBB following the <i>Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species</i>, released by CDFW on June 6, 2023, with results included in the Final EIR to properly disclose potential impacts on CBB pursuant to CEQA. The Project proponent should consult with</p>	<p>Prior to Project Initiation</p>	<p>Project Proponent</p>

Christina Rios
 City of Santee
 July 24, 2025
 Page 24 of 28

<p>CDFW prior to conducting the focused surveys to ensure survey methodology will yield valid results. If the focused survey results conclude presence of CBB, the Final EIR should include a discussion of the results with sufficient detail such that a CESA Incidental Take Permit can be issued based on the analysis provided in the DEIR.</p>		
<p>Recommendation #6: <u>Compensatory mitigation for impacts to suitable CBB habitat.</u> The Final EIR should specify appropriate compensatory mitigation for Project impacts on suitable CBB habitat. Such mitigation may be fulfilled through the Project’s proposed mitigation for impacts on nonnative grassland and Diegan coastal sage scrub habitats (MM-BIO-1 and MM-BIO-2).</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Mitigation Measure #1: <u>Crotch’s bumble bee.</u> Prior to issuance of a grading permit, a pre-construction survey shall be conducted by a qualified biologist to ensure no nests or Crotch’s bumble bee individuals are located within the construction area. The pre-construction survey shall include (1) a habitat assessment and (2) focused surveys, both of which shall be based on recommendations described in the <i>Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species</i>, released by CDFW on June 6, 2023, or the most current version at the time of construction. The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat onsite including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls and rubble. The habitat assessment shall be repeated prior to February 1 each year ground-disturbing activities occur to determine if nesting resources are present within the impact area. If suitable nesting, foraging, and/or overwintering resources are present in the impact area, focused surveys to determine species presence/absence within the proposed area of disturbance shall be conducted.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

Christina Rios
City of Santee
July 24, 2025
Page 25 of 28

<p>Focused surveys shall be performed by a biologist with expertise in surveying for bumble bees and authorized under a CESA Memorandum of Understanding (MOU). The survey shall include at least three survey passes spaced two to four weeks apart. The timing of these surveys shall coincide with the Colony Active Period (April 1 through August 31). Surveys may occur between one hour after sunrise and two hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, rainy, or drizzling) and surveyors shall wait at least one hour following rain. Optimal surveys are those conducted when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 mph). Within any potential habitat suitable for CBB, the biologist shall survey for foraging and nest resources suitable for bumble bee use. Ensuring all nest resources receive 100 percent visual coverage, the biologist shall watch the nest resources for up to five minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after five minutes of observation. If a worker bumble bee is detected, then a representative shall be identified by species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100 percent visual coverage; this could include a 30-to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar to verify nest activity (no longer than 30 minutes).</p> <p>A written survey report shall be submitted to the City and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the permits, qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. Survey results are considered valid until the start of the next Colony Active Period.</p>		
---	--	--

Christina Rios
 City of Santee
 July 24, 2025
 Page 26 of 28

<p>If Crotch’s bumble bee nests or individuals are not detected during focused surveys, no further mitigation is required. If nesting or floral resources occupied by Crotch’s bumble bee are detected within the construction area, the biologist shall notify and consult with CDFW to determine whether Project activities would result in impacts to Crotch’s bumble bee, in which case, an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to issuance of Grading Permit, Demolition Plans/Permits and Building Plans/Permits, and all necessary permit conditions shall be fulfilled prior to initiation of Project activities. In the event an ITP is needed, mitigation for direct impacts to Crotch’s bumble bee shall be determined through the ITP process. 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; California Code of Regulations, Title 14, Section 786.9).</p>		
<p>Recommendation #7: Riparian buffers. CDFW considers adverse impacts to a species protected by CESA, such as least Bell’s vireo, to be significant. CDFW recommends the City consider a project alternative that includes minimum 100-foot riparian conservation buffers between the edge of riparian habitat associated with the San Diego River and Sycamore Canyon Creek and proposed development areas. The buffer should be managed for conservation values with limited public access and use. Appropriately managed buffers between development and riparian habitats serve numerous functions for riparian habitat and the species they support. They provide expansion of the habitat’s biological values, protection from direct and indirect disturbance by humans and domestic animals and reduce edge effects. Buffers can help to mitigate the effects of noise, artificial light, line-of-sight disturbances, and invasive species.</p> <p>If riparian buffers are not feasible, the Final EIR should include a buffer of lesser width and how it would still avoid significant adverse impacts to occupied least Bell’s vireo breeding habitat based on site-specific information related to construction and subsequent human use of the development.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

Christina Rios
 City of Santee
 July 24, 2025
 Page 27 of 28

<p>Recommendation #8: <u>Additional impact analysis for rookery.</u> To fully disclose potential impacts to a “wildlife nursery site” under CEQA (CEQA Environmental Checklist IV(d)), CDFW recommends the Final EIR include the following additional information and analysis for the existing double-crested cormorant rookery:</p> <ul style="list-style-type: none"> v. Number of trees included in the rookery, total number of nests, and estimated number of birds using the rookery. vi. Presence or absence of birds at the rookery site outside the nesting season (conservatively April 1 through July 31). vii. An analysis of potential impacts to foraging habitat during the breeding season, particularly from dewatering of the pond north of the rookery site. viii. An analysis of potential indirect impacts to the rookery resulting from new high intensity uses near the rookery site associated with the Residential North and Hotel and Clubhouse developments. 	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Mitigation Measure #2: <u>Double-crested cormorant rookery.</u> MM-BIO-12 of the DEIR includes a suggested 150-foot “noise impact area” buffer to be established around the double-crested cormorant rookery. However, given the unique status of the rookery CDFW recommends an additional mitigation measure specific to the double-crested cormorant rookery be included in the Final EIR as outlined below:</p> <p>Construction activities associated with grading, clearing and grubbing, and adjacent tree removal within 500 feet of the double-crested cormorant rookery shall not occur during the typical nesting season (April 1 through July 31). Before initiation of construction activities outside of the typical nesting season (August 1 through March 31), a qualified biologist shall survey for active breeding activities at the rookery no more than three days prior to the start of construction. If breeding activities are observed at the rookery site, then no construction activities shall be allowed within 500 feet of the rookery until the breeding season has ended, and nests are no longer active (i.e., young have fledged and are no longer dependent on the parents). Completion of the breeding season shall be determined by a qualified biologist. While the rookery is active, the qualified biologist</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

Christina Rios
City of Santee
July 24, 2025
Page 28 of 28

will monitor the rookery for any signs of disruption to breeding activities by ongoing construction activities (e.g., adults appearing agitated, leaving the nest more than average, etc.). If the qualified biologist determines breeding activities are disrupted, the avoidance buffer shall be expanded until the disruption is no longer observed.		
---	--	--