



STATE OF CALIFORNIA  
DEPARTMENT OF FISH AND WILDLIFE

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April 13, 2026

Michael Ressler  
City of Vista  
200 Civic Center Dr  
Vista, CA 92084  
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**Subject: PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT for the City of Vista General Plan Update (Vista 2050) Project, SCH No. 2024080799, San Diego County, CA**

Dear Michael Ressler:

The California Department of Fish and Wildlife (CDFW) reviewed the Programmatic Environmental Impact Report (PEIR) from the City of Vista (City) for the City of Vista General Plan Update (Project, Vista 2050) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

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

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<sup>1</sup> 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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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 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 law<sup>2</sup> 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.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** City of Vista

**Objective:** The Project is a focused update of the City's current General Plan (City of Vista General Plan 2030). It reflects changing conditions in the City, legislative updates, and other state requirements for general plans. It will serve as a blueprint for future land use, health, safety, mobility, and resource conservation decisions. Vista 2050 is a policy document that does not include nor propose any site-specific development that could directly result in construction or operational impacts to the environment. Implementation of Vista 2050 would result in changes to land use designations that would allow for additional future development and redevelopment.

**Location:** The Project is located within the municipal boundaries of the City of Vista in northern San Diego County, extending into portions of the City's Sphere of Influence (SOI). The City's SOI is land outside of the municipal boundaries, identified for potential annexation into the City of Vista in the future. The city limits encompass approximately 19 square miles while the SOI encompasses approximately 7 square miles of unincorporated area adjacent to the city limits. The SOI borders Vista to the north and east and a small area to the west.

**Biological Setting:** Vista is part of a biologically diverse region characterized by a variety of habitats. Vegetation communities include: coastal and valley freshwater marsh/emergent wetland, open freshwater, exotic riparian woodland, mule fat scrub, southern cottonwood-willow riparian forest, southern coast live oak riparian forest, southern willow scrub, coastal sage-chaparral, Diegan coastal sage scrub, southern mixed chaparral, *Baccharis* scrub, non-native grassland, coast live oak woodland, and non-native vegetation. Land uses include agriculture, orchards/vineyards, and developed land. Much of the City's natural habitats occur around two significant

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<sup>2</sup> "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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waterways: Buena Vista Creek and San Luis Rey River. The San Luis Rey River represents one of the largest remaining river systems in northern San Diego County and serves as an important regional wildlife movement corridor and riparian habitat network, supporting numerous sensitive species.

Several special status species have been observed on site or have potential to occur on site which include:

### **Birds**

- Coopers hawk (*Accipiter cooperii*; CDFW Watch List (WL))
- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL)
- White-tailed kite (*Elanus leucurus*; California Fully Protected Species (FP))
- Yellow-breasted chat (*Icteria virens*; California Species of Special Concern (SSC))
- Osprey (*Pandion haliaetus*; WL)
- Coastal California gnatcatcher (*Polioptila californica californica*; Federal Endangered Species Act (ESA)-listed threatened, SSC)
- Least bell's vireo (*Vireo bellii pusillus*; ESA-listed endangered, California Endangered Species Act (CESA)-listed endangered)

### **Invertebrates**

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

### **Reptiles**

- California glossy snake (*Arizona elegans occidentalis*; SSC)
- Orange-throated whiptail (*Aspidoscelis hyperythra*; WL)
- Blainville's horned lizard (*Phrynosoma blainvillii*; SSC)
- Coronado skink (*Plestiodon skiltonianus interparietalis*; WL)

### **Mammals**

- Mountain lion (*Puma concolor*; CESA-candidate endangered)
- Western yellow bat (*Lasiurus canthinus*; SSC)
- Hoary bat (*Lasiurus cinereus*; SSC)
- Western red bat (*Lasiurus frantzii*; SSC)
- Yuma myotis (*Myotis yumanensis*; SSC)

### **Plants**

- San Diego thorn-mint (*Acanthomintha ilicifolia*; ESA-listed threatened, CESA-listed endangered, California Rare Plant Rank (CRPR 1B.1))

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- Thread-leaved brodiaea (*Brodiaea filifolia*; ESA-listed threatened, CESA-listed endangered, CRPR 1B.1)
- Orcutt's hazardia (*Hazardia orcuttii*; CESA-listed threatened, CRPR 1B.1)

**Project History:** The City's first General Plan was adopted in 1975 and has been periodically updated. CDFW issued a comment letter on September 19, 2024, in response to the Notice of Preparation for Vista 2050.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below 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. Additional comments or other suggestions are also included to improve the document.

### COMMENT # 1: Sphere of Influence

**Issue:** The PEIR should analyze impacts to Biological Resources within the SOI.

**Specific impact:** The PEIR does not discuss the potential impacts from the zoning changes within the SOI. The land use designations within the SOI are shown in Figure 3-5: Proposed 2050 Land Use Map, but are excluded from Figure 4.4-2: Biological Resources Location Map.

**Why impact would occur:** Land development or redevelopment can result in direct impacts to sensitive habitat and sensitive species from grading, clearing, type conversion, and grubbing of existing vegetation. These activities can have impacts on the local ecosystem, stream resources, and sensitive flora and fauna. A portion of the SOI is changing from rural residential (1 du/ac) to medium density residential (5.1 – 10 du/ac). The PEIR did not provide a discussion and analysis of the potential impacts in the SOI which may have a significant impact on biological resources. Without this analysis, impacts to sensitive species and other CDFW-jurisdictional resources may not be adequately avoided, minimized, or mitigated.

**Evidence impact would be significant:** According to CEQA Guidelines Section 15125(a), an EIR must include a description of the physical environmental conditions in the vicinity of the Project. The PEIR provided the physical environmental conditions within the city limits but did not include the environmental conditions in the SOI.

### Recommended Potentially Feasible Mitigation Measure(s)

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

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**Recommendation #1:** Sphere of Influence Discussion. The PEIR should include a thorough discussion and analysis of the biological impacts within the SOI.

**COMMENT # 2: Impacts to Crotch's Bumble Bee**

**Issue:** The Project may result in impacts to Crotch's bumble bee.

**Specific impact:** CDFW appreciates the consideration of Crotch's bumble bee in MM-BIO 1; however, the analysis could be improved to ensure impacts to Crotch's bumble bee are appropriately mitigated.

**Why impact would occur:** According to CDFW's Crotch's Bumble Bee Range – CDFW [ds3095] dataset, the Project lies within the current range of Crotch's bumble bee (CDFW 2026). Diegan coastal sage scrub and grassland habitat within the Project boundaries may provide suitable habitat to support Crotch's bumble bee. Crotch's bumble bees primarily nest underground in late February through late October in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2012).

Given that the City of Vista is in the current range of Crotch's bumble bee and suitable habitat is present, there is potential for this CESA candidate species to be impacted by development based on future project approvals that benefit from this general plan update. Future projects with ground and vegetation disturbance activities could result in potentially significant impacts to Crotch's bumble bee, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

**Evidence impact may be significant:** The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Take of any endangered, threatened, 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). Impacts to CESA listed species and their habitats 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). Impacts to CESA-listed species and their habitat meet the definition of endangered, rare, or threatened under CEQA (CEQA Guidelines § 15380).

**Recommended Potentially Feasible Mitigation Measure(s)**

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

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**Mitigation Measure #1:** CDFW recommends revising MM-BIO-1.3 to incorporate the underlined language and omit the language in strikethrough:

Crotch's Bumble Bee. If ground-disturbing and/or vegetation removal activities occur outside the overwintering season (November through January) for Crotch's bumble bee (*Bombus crotchii*), a County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of project activities to assess the presence of foraging, nesting, and/or overwintering Crotch's bumble bee. Focused surveys shall be conducted in suitable habitat habitats (i.e., areas that provide suitable nesting, overwintering, and/or foraging resources) within 50 feet of the construction footprint prior to the start of construction activities. Surveys shall be conducted by a qualified biologist familiar with the species' behavior and life history ecology, with methods guided by the recommendations described in the following protocol consistent with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species released by CDFW on June 6, 2023, or the current version at the time of construction. Focused surveys shall also be conducted throughout the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The survey shall focus on detecting Crotch's bumble bee nests, as well as foraging individuals, within 50 feet of the disturbance footprint. If active nests of Crotch's bumble bee are present, an avoidance buffer of at least 50 feet, as determined by the project biologist, shall be established around the nest to reduce the risk of disturbance or accidental take. Construction activities shall not occur within the avoidance buffer(s) until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). If a nest is detected, or if foraging or overwintering individuals are observed, CDFW shall be consulted to confirm that any proposed site-specific avoidance measures, such as the avoidance buffers described above, are sufficient to avoid take the qualified biologist shall have the ability to implement additional avoidance measures including could include, but are not limited to, seasonal restrictions pertaining to the removal of flowering plants and pesticide/herbicide use, dust control measures, and on-going biological monitoring during vegetation removal erosion control measures.

If active nests cannot be avoided or take of foraging individuals is anticipated, the necessary take authorization shall be obtained in the form of an incidental take permit pursuant to California Fish and Game Code (CFGF) Section 2081. Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition in accordance with a conceptual restoration plan to be prepared and submitted to the City for review and approval prior to construction. The conceptual restoration plan shall detail the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. Compensatory mitigation for the permanent loss of occupied Crotch's bumble bee habitat shall be fulfilled through habitat replacement of equal or better functions and values to those

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impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the incidental take permit process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank.

### **COMMENT # 3: Impacts to Bat Species of Special Concern**

**Issue:** The Project may have a significant impact on special status bat species beyond western yellow bat.

**Specific impact:** The Project contains suitable habitat for several bat species including western yellow bat, western red bat, and Yuma myotis. MM-BIO-1.5 specifies avoidance measures only for the western yellow bat and not the additional special status bat species. This omission could lead to unmitigated significant impacts.

**Why impact would occur:** Potential direct impacts include future tree removal or project construction on structures that may provide roosting habitat and therefore have the potential for direct impacts to bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities, and vibrations caused by heavy equipment.

**Evidence impact would be significant:** Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code § 4150, CCR § 251.1). Several bat species are also SSC, which meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines §15380). Adverse impacts to an SSC may have a significant effect on the environment (CEQA Guidelines §15065). Mitigation measures to avoid or substantially lessen the significant impact to bats include not only exclusion from maternity roosts, but also wintering sites, night roosts, mating roosts, and foraging sites.

### **Recommended Potentially Feasible Mitigation Measure(s)**

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

**Mitigation Measure #1:** CDFW recommends revising the first paragraph of MM-BIO-1.5 to include additional special status bat species by incorporating the underlined language and omitting the language in strikethrough:

Bat Surveys and Roost Avoidance. Prior to construction activities within or near suitable habitat for special-status bats ~~riparian vegetation that could disturb potential roost sites for western yellow bat (*Lasiurus xanthinus*)~~, a qualified biologist approved by the City shall conduct a habitat assessment to determine if existing or potential roosts are present on site. If no roosts or potential roost sites are identified, no additional measures will be required to avoid impacts to bat species. If bats are observed roosting or potential roost sites are identified in areas that may be disturbed, the following

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measures shall be implemented to reduce the potential impact to special-status and common bat species.

## **ADDITIONAL COMMENTS**

**Ministerial Actions.** While ministerial actions are exempt from the requirements of CEQA, the City retains the authority to regulate impacts to sensitive biological resources through its municipal code and permitting processes. CDFW recommends the City include language in the PEIR that the policy framework of Vista 2050 would be implemented by the City during future discretionary **and/or ministerial** project reviews to ensure impact minimization. Alternatively, CDFW recommends incorporating biological resource protection standards such as requirements for pre-construction surveys, avoidance buffers, and demonstration of compliance with applicable state and federal wildlife protection laws into its zoning ordinance or development code to ensure impacts from these projects are avoided or minimized to the extent feasible.

**Future Projects.** CDFW is available for scoping efforts related to future projects and would appreciate the opportunity to review and comment on any restoration or conservation management plans associated with individual projects.

**Lake and Streambed Alteration Agreement.** Given that wetlands and waters impacts are not analyzed in this PEIR, CDFW appreciates the acknowledgment that individual projects with the potential to impact wetlands or waters are subject to Fish and Game Code Section 1600 *et seq.*

**Mitigation and Monitoring Reporting Plan.** CDFW recommends the Project's environmental document 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

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Database (CNDDDB). The [CNDDDB website](#)<sup>3</sup> 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](#)<sup>4</sup>.

The City should ensure data collected for the preparation of the PEIR 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 PEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that 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 Helena Candaele<sup>5</sup>, Environmental Scientist.

Sincerely,

Signed by:  
  
AD7D070BCB66466...

Glen M. Lubcke  
Environmental Program Manager  
South Coast Region

<sup>3</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>4</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

<sup>5</sup> Phone: (858) 527-8482; Email: [Helena.Candaele@wildlife.ca.gov](mailto:Helena.Candaele@wildlife.ca.gov)

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## **ATTACHMENTS**

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife  
Glen M. Lubcke, Environmental Program Manager  
Jennifer Turner, Senior Environmental Scientist (Supervisor)  
Helena Candaele, Environmental Scientist

Office of Land Use and Climate Innovation  
[State.Clearinghouse@lci.ca.gov](mailto:State.Clearinghouse@lci.ca.gov)

## **REFERENCES**

[CDFW 2026] California Department of Fish and Wildlife. 2026. California Natural Diversity Database. Available at: <https://wildlife.ca.gov/Data/CNDDDB>.

Hatfield, R., Jepsen, S., Foltz Jordan, S., Blackburn, M., Code, Aimee. 2018. A Petition to the State of California Fish and Game Commission to List Four Species of Bumblebees as Endangered Species.

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, Princeton, New Jersey. 208pp.

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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
<p><b>Mitigation Measure #1: Habitat Assessment</b></p> <p>CDFW recommends revising MM-BIO-1.3 to incorporate the underlined language and omit the language in strikethrough:</p> <p><b>Crotch’s Bumble Bee.</b> If ground-disturbing <u>and/or vegetation removal</u> activities occur <del>outside the overwintering season (November through January) for Crotch’s bumble bee (Bombus crotchii),</del> <u>a County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of project activities to assess the presence of foraging, nesting, and/or overwintering Crotch’s bumble bee.</u> Focused surveys shall be conducted in suitable <del>habitat</del> <u>habitats</u> (i.e., areas that provide suitable nesting, <del>overwintering,</del> and/or foraging resources) within 50 feet of the construction footprint <del>prior to the start of construction activities.</del> Surveys shall be conducted by a qualified biologist familiar with the species’ behavior and <del>life history</del> <u>ecology,</u> <del>with methods guided by the recommendations described in the following protocol</del> <u>consistent with CDFW’s Survey Considerations for CESA Candidate Bumble Bee Species released by CDFW on June 6, 2023, or the current version at the time of construction.</u> <u>Focused surveys shall also be conducted throughout the appropriate flying season (April to August) to ensure no missed detection of Crotch’s bumble bee occurs.</u> <u>Surveys for Crotch’s bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year.</u> <del>The survey shall focus on detecting Crotch’s bumble bee nests, as well as foraging individuals, within 50 feet of the disturbance footprint.</del> If active nests of Crotch’s bumble bee are present, an avoidance buffer of at least 50 feet, as determined by the project biologist, shall be established around the nest to reduce the risk of disturbance</p>	<p>Prior to Project Initiation, During Project Construction</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
<p>or accidental take. Construction activities shall not occur within the avoidance buffer(s) until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days, indicating the colony has completed its nesting season and the next season’s queens have dispersed from the colony). If a nest is detected, or if foraging <u>or overwintering</u> individuals are observed, <del>CDFW shall be consulted to confirm that any proposed site-specific avoidance measures, such as the avoidance buffers described above, are sufficient to avoid take</del> <u>the qualified biologist shall have the ability to implement</u> additional avoidance measures <u>including could include, but are not limited to,</u> seasonal restrictions pertaining to the removal of flowering plants and pesticide/herbicide use, dust control measures, and <u>on-going biological monitoring during vegetation removal</u> <del>erosion control measures.</del></p> <p>If active nests cannot be avoided or take of <u>foraging</u> individuals is anticipated, <u>the</u> necessary take authorization shall be obtained in the form of an incidental take permit pursuant to California Fish and Game Code (CFGF) Section 2081. Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition in accordance with a conceptual restoration plan to be prepared and submitted to the City for review and approval prior to construction. The conceptual restoration plan shall detail the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success.</p> <p>Compensatory mitigation for the permanent loss of occupied Crotch’s bumble bee habitat shall be fulfilled through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the incidental take permit process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank.</p>		

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Mitigation Measure	Timing	Responsible Party
<p>CDFW recommends revising the first paragraph of MM-BIO-1.5 to include additional special status bat species by incorporating the underlined language and omitting the language in strikethrough:</p> <p><b>Bat Surveys and Roost Avoidance.</b> Prior to construction activities within or near <u>suitable habitat for special-status bats</u> <del>riparian vegetation that could disturb potential roost sites for western yellow bat (<i>Lasiurus xanthinus</i>)</del>, a qualified biologist <u>approved by the City</u> shall conduct a habitat assessment to determine if existing or potential roosts are present on site. If no roosts or potential roost sites are identified, no additional measures will be required to avoid impacts to bat species. If bats are observed roosting or potential roost sites are identified in areas that may be disturbed, the following measures shall be implemented to reduce the potential impact to special-status and common bat species.</p>		
<p><b>Recommendation #1: <u>Sphere of Influence Discussion.</u></b> The PEIR should include a thorough discussion and analysis of the biological impacts within the SOI.</p>	<p>Prior to CEQA Adoption</p>	<p>Lead Agency</p>