



STATE OF CALIFORNIA  
DEPARTMENT OF FISH AND WILDLIFE

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March 24, 2026

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**Subject: Draft Environmental Impact Report for the Oakcrest Specific Plan Project, SCH No. 2025060511, San Diego County, CA**

Dear Chris Garcia:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from City of San Marcos (City) for the Oakcrest Specific Plan (Project) 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 those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding 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

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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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conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for 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. CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program (Fish & G. Code, §2800 *et seq.*).

## **PROJECT DESCRIPTION SUMMARY**

**Project Proponent:** Meritage Homes

**Objective:** The objective of the Project is to construct a 257-unit residential subdivision over 38.45 acres. Project activities include demolition of existing homes, vegetation removal, grading, construction of new homes and facilities, establishment of fuel modification zones, and development of a 6.22-acre public park. The Project will also preserve 52.59 acres of biological open space on site.

**Location:** The 136.1-acre Project site is in San Marcos, on the west side of North Twin Oaks Valley Road, between Del Roy Drive and Legacy Drive (Attachment A). The site is primarily undeveloped with three existing homes in the central area of the site. Surrounding land uses include undeveloped land to the north, the Twin Oaks Golf Course and residential homes to the east, and residential homes to the south and west. Open space areas protected by conservation easements occur to the northeast, south, and west, directly adjacent to the Project site.

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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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**Biological Setting:** Per the Biological Resources Technical Report (BTR; Bargas 2025), the Project site is dominated by Diegan coastal sage scrub (84.78 acres) and intensive agriculture-pastureland (44.70 acres), with scattered patches of non-native woodland (3.20 acres), eucalyptus woodland (1.00 acre), and urban/developed land (2.50 acres). Historically, the site was used for agricultural purposes (e.g., orchards and cattle ranching), excluding the hillsides on the western end. While the orchard groves were removed in the 1970s, the property still provides pastureland for free-range cattle grazing but the area utilized by cattle has decreased over time. Approximately 0.524 acre of wetland resources occur within the Project area, including an ephemeral drainage that flows from the western end of the site and terminates at the center of the Project site. Two stock ponds are also noted on site, including one along the drainage and one isolated pond in the center of the site. A concrete channel also abuts North Twin Oaks Valley Road in the northeastern corner of the site.

Based on CDFW's review of the BTR and the California Natural Diversity Database<sup>3</sup>(CNDDDB; CDFW 2026), the following species<sup>4</sup> were detected or have the potential to occur within the Project site:

Plants:

- golden-rayed pentachaeta (*Pentachaeta aurea*; CRPR 4.2)
- graceful tarplant (*Holocarpha virgata* ssp. *elongata*; CRPR 4.2)
- ashy spike-moss (*Selaginella cinerascens*; CRPR 4.1)

Invertebrates:

- Crotch's bumble bee (*Bombus crotchii*; CESA-listed candidate endangered)
- monarch butterfly (*Danaus plexippus*; ESA proposed threatened)

Birds:

- white-tailed kite (*Elanus leucurus*; FP)
- western burrowing owl (*Athene cunicularia hypugaea*; CESA-listed candidate endangered; burrowing owl)
- coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, SSC; gnatcatcher)

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

<sup>4</sup> Nomenclature and species status follows the CNDDDB Special Animals List (CDFW, January 2026) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW, January 2026). ESA = Federal Endangered Species Act, CESA = California Endangered Species Act, FP = state Fully Protected Species, SSC = state Species of Special Concern, WL = state Watch List, CRPR = California Rare Plant Rank

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- Cooper’s hawk (*Accipiter cooperii*; WL)
- southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL)

Huffman Environmental biologists conducted general and focused biological surveys for the Project in 2025. Focused surveys included habitat assessments and presence/absence surveys for rare plants, gnatcatcher, burrowing owl, and Crotch's bumble bee. Rare plant surveys detected graceful tarplant (78 individuals; 0.13 acre), ashy spike-moss (70 individuals; 0.27 acre), and golden-rayed pentachaeta (215 individuals; 0.24 acre) on site. Burrowing owl protocol surveys conducted in accordance with CDFW’s 2012 Staff Report were negative. Protocol surveys for gnatcatcher were also negative; however, one gnatcatcher was incidentally observed dispersing on site during a burrowing owl survey in April 2025. Five monarch butterflies, two Crotch’s bumble bees, southern California rufous-crowned sparrow, and Cooper’s hawk were also observed during surveys. White-tailed kite was reported approximately 0.52 miles southeast of the Project area in 2022 (CNDDDB; CDFW 2026) but was not addressed by the BTR and DEIR (Attachment A, Figures 2 and 3).

The DEIR evaluates two options related to the design and impact assessment of a 150-foot-wide fuel modification Zone 2. Under **Option A**, Zone 2 is treated as “impact neutral”, and the 150-foot defensible space buffer is measured from the lot line, yielding approximately 53 acres of preserved biological open space. Under **Option B**, Zone 2 is measured from the primary structure and treated as a permanent impact area, yielding approximately 56 acres of biological open space. The Project impacts to vegetation and land cover types are summarized in Table 1 below.

**Table 1. Project Habitat Impacts**

<b>Vegetation / Land Cover Type</b>	<b>Existing (Acres)</b>	<b>Impacts (Acres) Option A<sup>5</sup></b>	<b>Impacts (Acres) Option B<sup>6</sup></b>
Diegan coastal sage scrub	84.78	32.40	29.70
Intensive agriculture-pastureland	44.70	42.80	40.70
Eucalyptus woodland	1.00	1.00	1.00
Non-native woodland	3.20	3.10	2.90
Urban/developed	2.50	2.10	2.40
<i>Uplands impacts subtotal</i>	<i>136.10</i>	<i>81.40</i>	<i>76.70</i>

<sup>5</sup> Option A for Fuel Modification Zone 2

<sup>6</sup> Option B for Fuel Modification Zone 2

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Ephemeral stream and stock ponds	0.524	0.28	0.28
<i>Wetland impacts subtotal</i>	<i>0.524</i>	<i>0.28</i>	<i>0.28</i>
<b><i>Impacts total</i></b>		<b><i>81.68</i></b>	<b><i>76.98</i></b>

Under Option A, the Project would directly impact 86% of the graceful tarplant (67 individuals; 0.12 acre) and 30% of the ashy-spike moss (21 individuals; 0.06 acre) detected on site. Alternatively, under Option B, the Project would directly impact 35% of the graceful tarplant (27 individuals; 0.12 acre) and 11% of the ashy-spike moss (8 individuals; 0.06 acre) detected on site. Additionally, the Project will directly impact Diegan coastal sage scrub, intensive agriculture-pastureland, and non-native woodland habitats that support gnatcatcher, southern California rufous-crowned sparrow, Cooper’s hawk, monarch butterfly, and Crotch’s bumble bee.

The DEIR incorporates Mitigation Measures (MM)-BIO 1 through BIO-4 to require construction fencing, an environmental awareness training program, biological construction monitoring, gnatcatcher breeding season avoidance and coordination with the Wildlife Agencies (collectively, CDFW and U.S. Fish and Wildlife Service), nesting bird seasonal avoidance or pre-construction surveys, and pre-construction surveys for Crotch’s bumble bee and/or consultation with CDFW for an Incidental Take Permit (ITP). MM-BIO-5 through BIO-7 require compliance with aquatic resources permitting and compensatory habitat mitigation for impacts to Diegan coastal sage scrub at a minimum 1:1 ratio through on-site preservation and management and/or purchase of bank credits.

**Project History:** In 2025, CDFW provided a comment letter on the Notice of Preparation for the Project (SCH No 2025060511). Our letter recommended focused surveys be completed for rare plants and special-status wildlife species including white-tailed kite, gnatcatcher, and Crotch’s bumble bee. Our letter also recommended the DEIR address cumulative impacts, avoidance and minimization of impacts through project design, seasonal avoidance of nesting birds and raptors, native landscaping, fuel modification, artificial lighting, and streambed resources.

**Timeframe:** Project activities are anticipated to occur from December 2026 to December 2028.

**COMMENTS AND RECOMENDATIONS**

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.

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### **COMMENT #1: Fuel Modification Zones**

**Issue:** The DEIR designates fuel modification Zone 2 as “impact neutral” under Option A; however, this designation underestimates long-term effects of fuel modification activities on sensitive vegetation communities and wildlife habitat.

**Specific impact:** Selective thinning and ongoing vegetation management within Zone 2 will result in a permanent reduction in habitat structure value, composition, and ecological function within native vegetation communities.

**Why impact would occur:** Fuel modification activities in Zone 2 include selective removal of shrubs, thinning of woody vegetation, and recurring maintenance to reduce fuel loads. Although these activities do not involve complete vegetation removal, repeated thinning over time alters vegetation density, species composition, and increases edge effects, which cumulatively degrade habitat quality and reduce its suitability for sensitive plant and wildlife species.

**Evidence impact may be significant:** Under CEQA, an EIR must evaluate fuel modification as a biological impact where it results in ongoing changes to vegetation and habitat. CEQA Guidelines §15382 defines a significant effect as a substantial adverse change in physical conditions, including habitat alteration. In addition, §15126.2(a) requires analysis of direct, indirect, and long-term impacts, indicating that recurring vegetation management (such as ongoing thinning in Zone 2) should not be treated as a one-time or negligible effect.

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

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

**Recommendation #1 Revised Fuel Modification Impact Analysis:** CDFW considers all fuel modification zones to be part of a Project’s permanent impacts. As such, CDFW recommends the DEIR be revised to treat impacts within this zone as permanent biological impacts rather than “impact neutral.” The revised EIR impact analysis should reflect repeated vegetation management results in long-term functional degradation of habitat, and appropriate mitigation measures should be identified to address these permanent impacts.

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

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**Issue:** The Project will directly impact habitat occupied by Crotch's bumble bee. The DEIR's MM-BIO-3 does not adequately address potential impacts to Crotch's bumble bee.

**Specific Impact:** Project activities including vegetation clearing, grubbing, and grading directly impact occupied habitats for Crotch's bumble bee.

**Why Impact Would Occur:** Two Crotch's bumble bees, including one queen, were detected within the Project impact footprint during biological surveys in Spring 2025. If Crotch's bumble bees are using burrows within and/or adjacent to the Project site for nesting, direct and/or indirect impacts could result from ground disturbing activities (i.e. vegetation clearing, trenching, horizontal directional drilling) which could lead to death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success.

**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. Crotch's bumble receives the same protections as a listed species while it is a candidate species under CESA. 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). In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the Terrestrial and Vernal Pool Inverts of Conservation Priority List<sup>7</sup>. Crotch's bumble bee also meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

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

CDFW recommends MM-BIO-3 be replaced with the following measure:

**Mitigation Measure #1 Crotch's Bumble Bee Protection:** Prior to any ground-disturbing activities within suitable habitat for the Crotch's bumble bee (i.e., intensive agriculture-pastureland and Diegan coastal sage scrub), the Project Proponent shall consult with CDFW to obtain a CESA Incidental Take Permit (ITP). Additionally, the Project Proponent shall compensate for direct impacts to suitable Crotch's

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<sup>7</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=149499&inline>

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bumble bee habitat (i.e. foraging, nesting, and overwintering) in consultation with CDFW. The mitigation package shall include implementation of a Preserve Management Plan, recordation of a Conservation Easement, non-wasting endowment funding, and long-term management of suitable mitigation lands in perpetuity.

### **COMMENT #3: Impacts to Monarch Butterflies**

**Issue:** The DEIR does not incorporate mitigation measures to address potential impacts to monarch butterflies and suitable breeding habitat.

**Specific Impact:** Project vegetation clearing and grubbing will directly impact habitat occupied by monarch butterflies.

**Why Impact Would Occur:** Per the BTR, five monarch butterflies were detected nectaring within the Project impact footprint during biological surveys in 2025. Additionally, the Project site contains suitable nectar sources and narrow-leaf milkweed (*Asclepias fascicularis*), a primary host plant for monarch breeding. If monarch butterflies are using suitable habitat within and/or adjacent to the Project site for foraging and/or breeding, direct and/or indirect impacts could result from ground disturbing activities (i.e. vegetation clearing or grubbing) which could lead to death or injury of adults, eggs, and larvae.

**Evidence Impact May Be Significant:** The monarch butterfly is included on CDFW's Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan<sup>8</sup> (CDFW 2017; CDFW 2015). The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, impacts to the monarch butterfly could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

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

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

**Recommendation #2 Monarch Butterfly Habitat Disclosure:** CDFW recommends the DEIR include a discussion of the extent of suitable nectaring plants and breeding habitat (i.e. milkweed) within the Project area that may support monarch butterflies and would be impacted. Additionally, the DEIR should

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<sup>8</sup> <https://wildlife.ca.gov/SWAP/Final>

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include a figure depicting suitable nectaring and breeding habitat location(s) in relation to the project footprint.

**Mitigation Measure #2 Monarch Butterfly Avoidance:** To avoid and minimize impacts to monarch butterfly, Project vegetation clearing and grubbing of suitable nectaring and breeding habitat shall occur outside of the breeding season for the monarch butterfly (February 1 - September 31). If avoidance of the breeding season is infeasible, a qualified biologist or botanist shall assess the Project area for milkweed and other nearby plants (up to 10 meters away from milkweed stands) for the presence of monarch eggs, larvae, and chrysalises. Any milkweed or other plants found to be occupied by monarch butterfly eggs, larvae, or chrysalises shall be flagged for avoidance. If Project impacts to monarch-occupied milkweed is unavoidable, CDFW recommends monarch eggs, larvae, and chrysalises be relocated by a qualified biologist holding a Specific Use Scientific Collecting Permit in consultation with CDFW. Additionally, the Project Proponent shall retain a qualified biologist to evaluate the potential to re-plant native milkweed and nectaring plants within the proposed on-site preservation area in consultation with CDFW.

#### **COMMENT #4: Impacts to White-tailed Kite**

**Issue:** The DEIR does not disclose or analyze potential impacts to white-tailed kite, a State Fully Protected species. Take of Fully Protected species must be avoided as no incidental take permit can be issued.

**Specific Impact:** A white-tailed kite was observed flying approximately 0.52 mile southeast of the Project area in 2022 (CNDDDB; CDFW 2025). While this occurrence record was previously mentioned in CDFW's NOP comment letter for the Project, the DEIR and BTR did not evaluate the potential for white-tailed kite within the Project area or whether Project activities could have impacts to the species.

**Why Impact Would Occur:** White-tailed kite nest in trees or large shrubs typically located adjacent to open grassland or agricultural areas used for foraging. The DEIR identifies grassland habitats and Eucalyptus trees within the Project area, which may provide suitable foraging and nesting habitat. Construction-related noise, vegetation removal, or human activity occurring near active nests during the breeding season could result in disturbance or nest abandonment, which may constitute take under the Fish and Game Code. Project activities may also result in temporary disturbance or loss of foraging habitat.

**Evidence Impact May Be Significant:** White-tailed kite is designated as a Fully Protected species under the California Fish and Game Code § 3511. A Fully Protected species may not be taken or possessed at

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any time. Given that no incidental take permit can be issued for Fully Protected species, minimization of significant impacts is not sufficient for Fully Protected species. Impacts must be fully avoided.

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

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

**Recommendation #3 White-tailed Kite Analysis:** The DEIR should disclose historic records of white-tailed kite adjacent to the Project area and include an analysis of whether suitable habitat for white-tailed kite occurs within the Project site. Additionally, the DEIR should include a discussion of how potential direct, indirect, and cumulative impacts to white-tailed kite will be fully avoided.

### **ADDITIONAL COMMENTS**

- 1. Mitigation and Monitoring Reporting Plan.** CDFW recommends the Project's mitigation measures are incorporated into 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 B).
- 2. Designation of Intensive Agriculture-Pastureland Habitat.** CDFW recommends the DEIR re-assess the habitat designation for areas described as intensive agriculture-pastureland. According to Oberbauer 2008, intensive agriculture is limited to areas actively used for dairies, nurseries, poultry ranches, and livestock and where no vegetation is present except for animal holding facilities. Likewise, pasture is described as planted fields that are usually maintained and irrigated fields of monoculture crops. Based on the description and habitat photos provided in the BTR, it is CDFW's opinion that this vegetation type would be more accurately described as non-native grassland. This vegetation community also supports multiple sensitive species on site including graceful tarplant, Crotch's bumble bee, monarch, and potentially white-tailed kite. As such, we recommend any impacts to non-native grassland be mitigated at a minimum mitigation ratio of 0.5:1.

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3. **Lake and Streambed Alteration.** The Project will impact 0.277 acre of jurisdictional aquatic resources, including an ephemeral drainage and two stock ponds. We appreciate the inclusion of MM-BIO-7 that requires written notification to CDFW pursuant to Fish & G. Code, § 1602 *et seq.* We look forward to reviewing the Project notification and coordinating with the City.
4. **Avoidance of Nesting Birds and Raptors.** CDFW appreciates the inclusion of MM BIO-4 to address impacts to nesting birds and raptors protected under the California Fish and Game Code. Specifically, MM BIO-4 requires pre-construction nesting surveys no earlier than five (5) days prior to start of activities to confirm the presence or absence of nesting birds and/or raptors. However, nesting birds may initiate nests quickly during the breeding season, and surveys conducted several days prior to construction may not accurately reflect current nesting conditions. Therefore, CDFW recommends MM BIO-4 be revised to require pre-construction nesting surveys to occur within three (3) days prior to the start of activities to ensure active nests are not inadvertently disturbed. CDFW also recommends that MM BIO-4 clarify that if construction activities are delayed for more than three (3) days after completion of the nesting bird survey, additional surveys shall be conducted prior to the initiation of construction.

## 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 CNDDDB. The CNDDDB website<sup>9</sup> provides directions 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>10</sup>.

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

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<sup>9</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>10</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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## 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 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 of San Marcos in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alison Kalinowski, Environmental Scientist, at (858) 775-6320 or [Alison.Kalinowski@wildlife.ca.gov](mailto:Alison.Kalinowski@wildlife.ca.gov).

Sincerely,

Signed by:  
  
AD7D070BCB66466...

Glen M. Lubcke  
Environmental Program Manager  
South Coast Region

## ATTACHMENTS

- A. Figure 1. Project Location
  - Figure 2. Vegetation and Land Cover Types
  - Figure 3. Special-Status Species
- B. Draft Mitigation Monitoring and Reporting Plan (MMRP) Table

cc: California Department of Fish and Wildlife  
Glen M. Lubcke, Environmental Program Manager  
Jennifer Turner, Senior Environmental Scientist (Supervisor)  
Alison Kalinowski, Environmental Scientist

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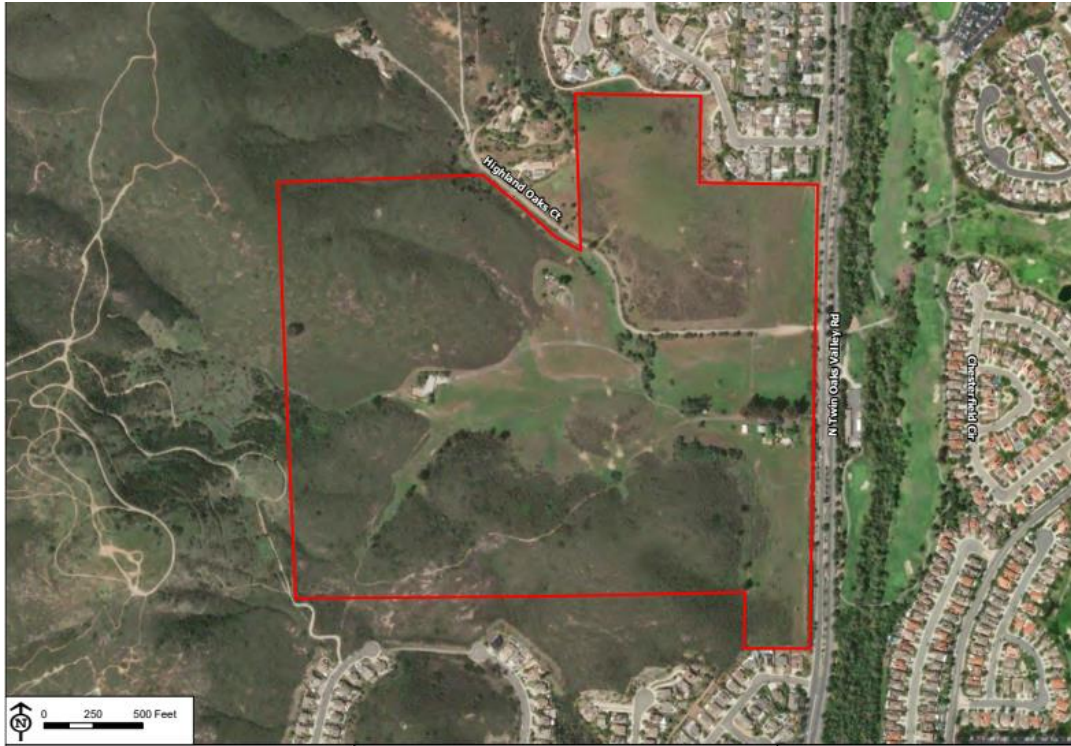
Office of Planning and Research  
State.clearinghouse@lci.ca.gov

## REFERENCES

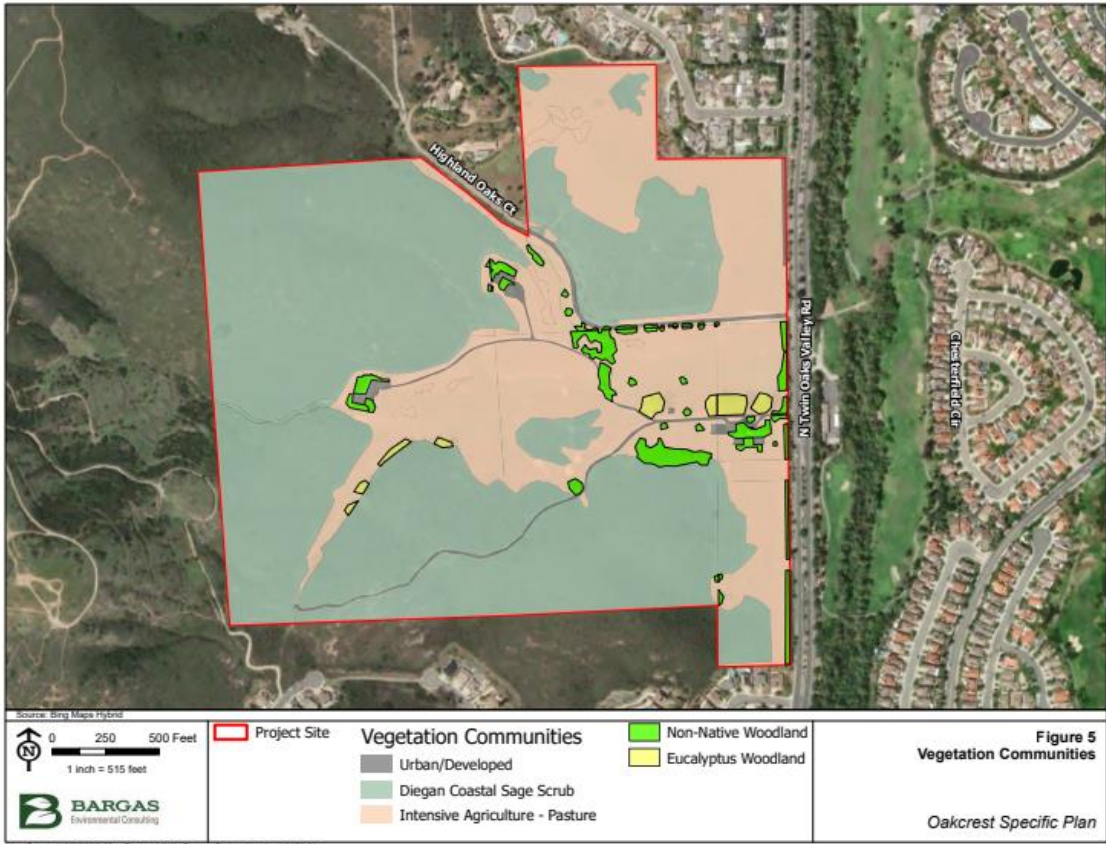
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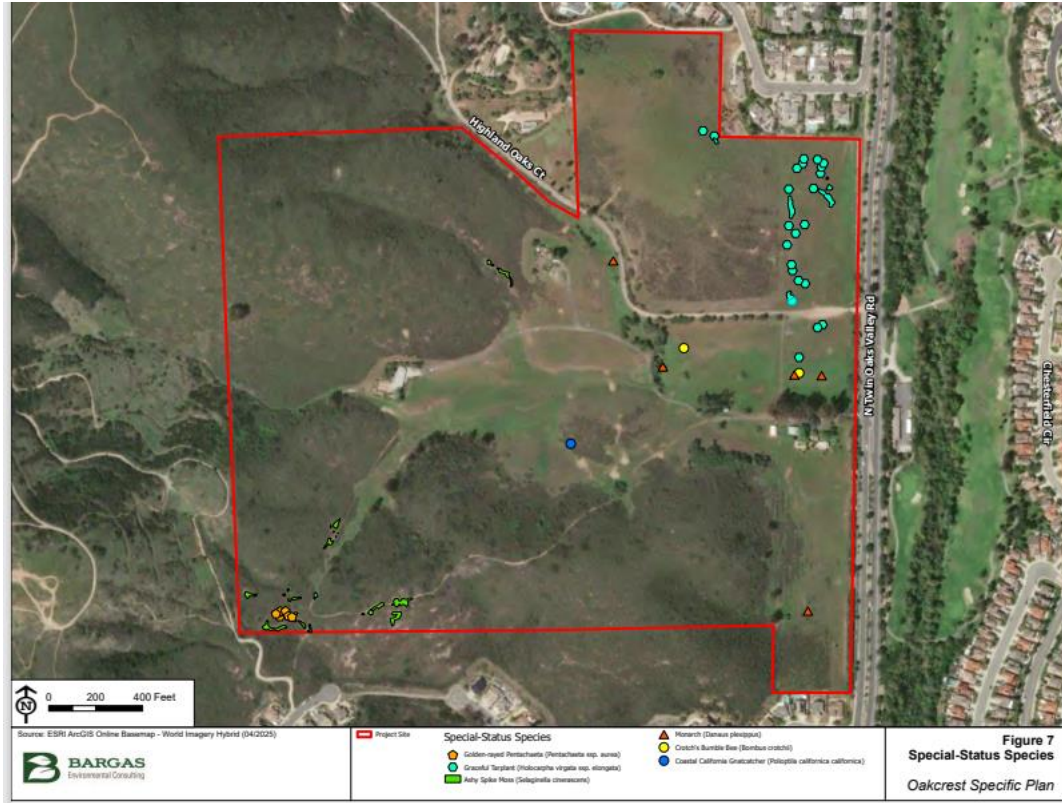
**ATTACHMENT A: FIGURE 1. PROJECT LOCATION (SOURCE: BARGAS 2025)**



**ATTACHMENT A: FIGURE 2. VEGETATION AND LAND COVER TYPES (SOURCE: Bargas 2025)**



### ATTACHMENT A: FIGURE 3. SPECIAL-STATUS SPECIES (SOURCE: BARGAS 2025)



**ATTACHMENT B: DRAFT MITIGATION MONITORING AND REPORTING PLAN (MMRP)**

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

<b>Mitigation Measure</b>	<b>Timing</b>	<b>Responsible Party</b>
<p><b>Recommendation #1 Revised Fuel Modification Impact Analysis:</b> CDFW considers all fuel modification zones to be part of a Project’s permanent impacts. As such, CDFW recommends the DEIR be revised to treat impacts within this zone as permanent biological impacts rather than “impact neutral.” The revised EIR impact analysis should reflect repeated vegetation management results in long-term functional degradation of habitat, and appropriate mitigation measures should be identified to address these permanent impacts.</p>	<p>Prior to adoption of CEQA document</p>	<p>City</p>
<p><b>Mitigation Measure #1 Crotch’s Bumble Bee Protection:</b> Prior to any land-disturbing activities within suitable habitat for the Crotch’s bumble bee (i.e., intensive agriculture-pasture and Diegan coastal sage scrub), the Project Proponent shall consult with CDFW to obtain a CESA Incidental Take Permit (ITP). Additionally, the Project Proponent shall compensate direct impacts to suitable habitat (i.e. foraging, nesting, and overwintering) for Crotch’s bumble bee in consultation with CDFW. The mitigation package shall include implementation of a Preserve Management Plan, recordation of a Conservation Easement, non-wasting endowment funding, and long-term management of suitable mitigation lands in perpetuity.</p>	<p>Prior to Project Initiation</p>	<p>Project Proponent</p>
<p><b>Recommendation #2 Monarch Butterfly Habitat Disclosure:</b> CDFW recommends the DEIR include a discussion of the extent of suitable nectaring plants and breeding habitat (i.e. milkweed) within the Project area that may support monarch butterflies and would be impacted. Additionally, the DEIR should include a figure depicting suitable nectaring and breeding habitat location(s) in relation to the project footprint.</p>	<p>Prior to adoption of CEQA document</p>	<p>City</p>

Mitigation Measure	Timing	Responsible Party
<p><b>Mitigation Measure #2 Monarch Butterfly Avoidance:</b> To avoid and minimize impacts to monarch butterfly, Project vegetation clearing and grubbing of suitable nectaring and breeding habitat shall occur outside of the breeding season for the monarch butterfly (February 1- September 31). If avoidance of the breeding season is infeasible, a qualified biologist or botanist shall assess the Project area for milkweed and other nearby plants (up to 10 meters away from milkweed stands) for the presence of monarch eggs, larvae, and chrysalises. Any milkweed or other plants found to be occupied by monarch butterfly eggs, larvae, or chrysalises shall be flagged for avoidance. If Project impacts to monarch-occupied milkweed is unavoidable, CDFW recommends monarch eggs, larvae, and chrysalises be relocated by a qualified biologist holding a Specific Use Scientific Collecting Permit in consultation with CDFW. Additionally, the Project Proponent shall retain a qualified biologist to evaluate the potential to re-plant native milkweed and nectaring plants within the proposed on-site preservation area in consultation with CDFW.</p>	<p>Prior to Project Initiation, During Project Activities</p>	<p>Project Proponent, Qualified Biologist or Botanist</p>
<p><b>Recommendation #3 White-tailed Kite Analysis:</b> The DEIR should disclose historic records of white-tailed kite adjacent to the Project area and include an analysis of whether suitable habitat for white-tailed kite occurs within the Project site. Additionally, the DEIR should include a discussion of how potential direct, indirect, and cumulative impacts to white-tailed kite will be fully avoided.</p>	<p>Prior to adoption of CEQA document</p>	<p>City</p>

