



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Via Electronic Mail Only

March 11, 2026

Harley Wallace
Santee Fire Department Administration
City of Santee
10601 Magnolia Avenue
Santee, CA 92071
HWallace@CityofSanteeCa.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the San Diego River Fire Hazard Mitigation Plan Project, SCH No. 2026020351, San Diego County, CA

Dear Harley Wallace:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Santee (City) for the San Diego River Fire Hazard Mitigation Plan (FHMP, or 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 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 conservation, protection, and

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.

Harley Wallace
City of Santee
March 11, 2026
Page 2 of 14

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 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 (Fish & G. Code, § 2800 et seq.). The City is in the process of developing an NCCP/HCP under the Multiple Species Conservation Program (MSCP) Subregional Plan. A draft MSCP Subarea Plan was circulated for public review in late summer 2025 and CDFW provided comments on the DEIR jointly with the U.S. Fish and Wildlife Service in a letter dated September 22, 2025 (SCH No. 2023030471); however, the MSCP Subarea Plan has not yet been adopted by the City and both state and federal take authorizations have not been issued to the City.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Santee, Santee Fire Department Administration

Objective: The objective of the Project is to reduce wildfire risk around critical public infrastructure, adjacent residential neighborhoods, and biologically sensitive habitats within the San Diego River corridor through the removal of non-native and invasive plant species. As part of the Project, a Fuels Treatment Plan (FTP) will be developed that includes treatment strategies specific to wildfire exposure, access conditions, existing vegetation, and proximity to sensitive resources. The FTP will also incorporate

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."

Harley Wallace
City of Santee
March 11, 2026
Page 3 of 14

best management practices to avoid or minimize impacts to natural resources within the project site.

Location: The nearly 300-acre project site encompasses 32 parcels within the San Diego River corridor where it runs through the center of the City. The project site is bound by the unincorporated community of Lakeside in the east and the confluence of the San Diego River with Forester Creek in the west.

Biological Setting: The Project site includes a roughly 3.5-mile stretch of the San Diego River bound by City park recreation facilities and residential and commercial development to the north and south. Natural vegetation communities within the project area include riparian forest and woodland, freshwater marsh, open water, and smaller areas of coastal sage scrub, grassland, and unvegetated channel.

These natural vegetation communities support a variety of sensitive plant and wildlife species. A search of the California Natural Diversity Database (CNDDDB; La Mesa and El Cajon U.S.G.S. 7.5 min. quads) returned observation data for 86 special status species. Sensitive species known to occur within or in proximity to the site include³:

Plants:

- San Diego ambrosia (*Ambrosia pumila*; ESA-endangered, CRPR 1B.1)
- smooth tarplant (*Centromadia pungens ssp. laevis*; CRPR 1B.1)

Invertebrates:

- Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered)
- Quino checkerspot butterfly (*Euphydryas editha quino*; ESA-endangered)
- Hermes copper butterfly (*Lycaena hermes*; ESA-threatened)

Amphibians/Reptiles:

- western spadefoot (*Spea hammondi*; ESA proposed threatened, SSC, proposed for CESA listing)
- California glossy snake (*Arizona elegans occidentalis*; SSC)

Birds:

- least Bell's vireo (*Vireo bellii pusillus*; ESA-endangered, CESA-endangered)

³ 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, SSC = state Species of Special Concern, CRPR = California Rare Plant Rank

Harley Wallace
City of Santee
March 11, 2026
Page 4 of 14

Birds (cont.):

- coastal California gnatcatcher (*Polioptila californica californica*; ESA-threatened, SSC)

Mammals:

- big free-tailed bat (*Nyctinomops macrotis*; SSC)
- pallid bat (*Antrozous pallidus*; SSC)

The riparian corridor also provides a critical linkage for wildlife movement between open space to the east and west of the City's boundaries.

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 to fish and wildlife (biological) resources.

Specific Comments

- 1) Lake and Streambed Alteration. As described in the NOP, the Project proposes activities within and adjacent to the San Diego River. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow of water, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW recommends that the City assess whether notification is appropriate. A Notification package for a LSAA may be obtained by accessing CDFW's [Lake and Streambed Alteration Program website](#)⁴.
- 2) Potential Impacts to Listed Species. CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). CESA-listed species with potential to occur within the project site include least Bell's vireo and CESA candidate species Crotch's bumble

⁴ <http://www.wildlife.ca.gov/Conservation/LSA>

Harley Wallace
City of Santee
March 11, 2026
Page 5 of 14

bee. Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization prior to implementing the Project.

CDFW is aware that the City may pursue take coverage for the Project under the MSCP Subarea Plan currently in draft. However, should the Project proceed before the MSCP Subarea Plan has been finalized and approved by the City, and an NCCP Permit issued by CDFW, other take authorizations should be considered. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subs. (b) and (c)). Per Figure 1 of the NOP, it appears that a portion of the Project site at the far western end extends into an area that is proposed as 'Not a Part' of the MSCP Subarea Plan. If accurate, that area would not be covered for incidental take under the MSCP Subarea Plan and, if determined necessary, would require separate take authorization. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. To ensure CDFW will be able to use the City's CEQA document for the issuance of an ITP, the DEIR should address all Project impacts to CESA-listed and CESA candidate species and specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

- 3) Plant Species to Target for Removal. As described in the NOP, the Project proposes to lower wildfire risk within the San Diego River corridor through targeted removal of non-native and invasive plant species. CDFW recommends targeting non-native, invasive species listed as '*Moderate, High, Limited, and Watch*' by the [California Invasive Plant Council](#)⁵.
- 4) Compliance with Current Land Protections. The Project site encompasses several parcels identified as existing protected open space, preserves, prior mitigation sites, and/or otherwise conserved for natural resource purposes. Several but not all the protected properties within or adjacent to the Project site have recorded Conservation Easements (i.e., Mast Park West, Lowe's Mitigation Preserve, and the Smooth Tarplant Preserve). Others have Conservation Easements in progress (Mast Park Preserve), are protected by Restrictive Covenants (Walker Preserve) and City ordinance (Mast Park East) or provide mitigation for previous projects (Caltrans Forester Creek Mitigation Site). Some also have associated habitat management plans. The DEIR should disclose any approvals required to conduct Project activities within the protected lands and include an analysis of whether the proposed Project

⁵ <https://www.cal-ipc.org/plants/inventory/>

Harley Wallace
City of Santee
March 11, 2026
Page 6 of 14

activities are consistent with the various protection mechanisms and/or management plans for these properties, as well as the conservation strategy of the MSCP Subarea Plan; and if not, how any inconsistencies would be addressed.

General Comments

- 5) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 6) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR.
 - a. A complete discussion of the purpose and need for, and description of the proposed Project.
 - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts to biological resources. CDFW also recommends the City to consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development.
 - c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
 - d. Where the Project may impact aquatic and riparian resources, CDFW recommends the City select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities.

Harley Wallace
City of Santee
March 11, 2026
Page 7 of 14

Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

- 7) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information.
- a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on natural resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities webpage](#)⁶.
 - b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#)⁷. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits

⁶ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

⁷ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

Harley Wallace
City of Santee
March 11, 2026
Page 8 of 14

to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.

- c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The [Manual of California Vegetation](#)⁸, second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off-site.
- d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to CDFW's [California Natural Diversity Database](#)⁹ (CNDDDB). The CNDDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.
- e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See [CDFW's Survey and Monitoring Protocols and Guidelines](#)¹⁰ for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.
- f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for

⁸ <https://vegetation.cnps.org/>

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

¹⁰ <https://wildlife.ca.gov/conservation/survey-protocols>

Harley Wallace
City of Santee
March 11, 2026
Page 9 of 14

wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation could occur over a protracted time frame or in phases.

- 8) Direct and Indirect Impacts to Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DEIR should address the following.
- a. A discussion of potential impacts from lighting, noise, temporary human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts to biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)).
 - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).
 - c. Impacts to, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.
 - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address any potential water extraction activities and the potential resulting impacts to habitat supported by the groundwater. Measures to mitigate such impacts should be included.
 - e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
- 9) Cumulative Impacts. Cumulative impacts to biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may

Harley Wallace
City of Santee
March 11, 2026
Page 10 of 14

substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts to biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). The City's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if the City concludes that the Project would not result in cumulative impacts to biological resources, the City, "shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

- 10) Nesting Birds. To avoid impacts to nesting birds, CDFW recommends that clearing of vegetation occur outside of the peak avian breeding season, which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project activities are necessary during the bird breeding season, a qualified biologist with experience in conducting bird surveys should conduct a nesting bird survey within three days prior to work in the area. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. CDFW generally recommends a 100-foot buffer for common avian species, 300 feet for listed or highly sensitive birds, and 500 feet for raptors. An appropriate buffer should be determined by a qualified biologist and delineated by temporary fencing and remain in effect as long as project activities are occurring. No Project construction shall occur within any nest buffer zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by Project activities. Reductions in nest buffer distances may be allowable depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 11) Mitigation Measures. 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). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be

Harley Wallace
City of Santee
March 11, 2026
Page 11 of 14

feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).

- a. The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
 - b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 12) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be proposed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.
- 13) Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.
- 14) Salvage, Relocation and Translocation of Plants and Animal Species. Salvage, relocation and translocation require the collection, handling, capturing or possession of wildlife and/or plants with the goal of moving or removing them from

Harley Wallace
City of Santee
March 11, 2026
Page 12 of 14

one location and permanently moving them to a new location. CDFW generally does not support the use of relocation or translocation as a mitigation measure for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are often not monitored over the long-term and successful outcomes are dubious. CDFW has found that permanent preservation and management of habitat to support affected species is often a more effective long-term strategy for conserving plants and animals and their habitats.

- 15) Scientific Collecting Permit and Voucher Collecting Permit. A Scientific Collecting Permit would be necessary if Project activities necessitate capture and relocation of wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts to wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's [Scientific Collecting Permit webpage](#)¹¹.

A voucher collection permit is required to collect state-listed plant species for identification purposes during field surveys, or to collect voucher specimens to document a newly discovered or previously unvouchered occurrence of a state-listed plant. There is no charge to apply for a voucher collection permit. Anyone who collects scientific plant specimens of state-listed species, or who may encounter a state-listed species during field surveys should have a plant voucher collection permit. To apply for a Voucher Collecting Permit please see CDFW's [Voucher Collecting Permit Page](#).

- 16) Use of Native Plants and Trees. If restoration is a component of the Project, CDFW recommends the DEIR include a native plant palette. The Project's revegetation plan should be disclosed and evaluated in the DEIR. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as willows (*Salix spp.*), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds as well as high insect and pollinator value.

¹¹ <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

Harley Wallace
City of Santee
March 11, 2026
Page 13 of 14

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](#)¹² 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](#)¹³.

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

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 NOP to assist the City in identifying and mitigating Project impacts to biological resources. Questions regarding this letter or further coordination should be directed to Heather Schmalbach¹⁴, Senior Environmental Scientist (Specialist).

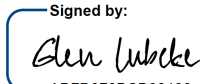
¹² <https://wildlife.ca.gov/Data/CNDDDB>

¹³ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

¹⁴ Email: Heather.Schmalbach@wildlife.ca.gov, Phone: 858-775-7399

Harley Wallace
City of Santee
March 11, 2026
Page 14 of 14

Sincerely,

Signed by:

AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

cc: California Department of Fish and Wildlife
Glen M. Lubcke, Environmental Program Manager
Melanie Burlaza, Senior Environmental Scientist (Supervisor)
Heather Schmalbach, Senior Environmental Scientist (Specialist)

U.S. Fish and Wildlife Service
Jonathan Snyder¹⁵, Assistant Field Supervisor
Susan Wynn¹⁶, Supervisory Fish and Wildlife Biologist
Samantha Padilla¹⁷, Fish and Wildlife Biologist

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

REFERENCES

California Department of Fish and Game. (2011). *CNDDDB Data Use Guidelines*. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27285&inline>

California Department of Fish and Wildlife. (2021). *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

California Fish and Game Commission. (2005). *Miscellaneous Policies*. Retrieved from <https://fgc.ca.gov/About/Policies/Miscellaneous>

Sawyer, J. O., Keeler-Wolf, T., & Evens, J. M. (2009). *A Manual of California Vegetation* (Second ed.). Sacramento, CA: California Native Plant Society. Retrieved from <https://vegetation.cnps.org/>

¹⁵ Jonathan_D_Snyder@fws.gov

¹⁶ Susan_Wynn@fws.gov

¹⁷ Samantha_Padilla@fws.gov