



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

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

June 12, 2026

Sarah Cluff
Senior Planner
City of San Marcos Planning Division
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Subject: Notice of Preparation of a Draft Single Condition Environmental Impact Report for the Sancerra Mission Road Mixed Use Development, SCH No. 2026050746, San Diego County, CA

Dear Sarah Cluff:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Draft Single Condition Environmental Impact Report (DEIR) from City of San Marcos (City) for the Sancerra Mission Road Mixed Use Development (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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 conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those

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

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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 and Game Code 2800 *et seq.*).

PROJECT DESCRIPTION SUMMARY

Proponent: Michael White, Sancerra Mission Road, LLC

Objective: The objective of the Project is to construct a 100-unit residential subdivision. Project activities include grading, vegetation removal, construction of homes and facilities, and development of a centrally located courtyard area, one acre of common landscaped area, and a private roadway. Off-site improvements would include portions of the secondary fire access road to the west of the parcel, as well as utility connections beneath North Pacific Street and Descanso Road.

Location: The 5.65-acre Project site is located at 302 North Pacific Street in San Marcos, north of West Mission Road, south of Palomarcos Avenue, and east of South Rancho Sante Fe Road (Attachment A, Figure 1). The site is primarily undeveloped; however, a single structure and storage shed occur on the eastern end of the property adjacent to North Pacific Street. Surrounding land uses include industrial development to the south and residential homes to the north, west, and east. Open space areas protected by conservation easements occur off-site to the north (Baldwin property) and to the west (Rancho Santalina).

Biological Setting: The NOP did not include a biological report, nor did it disclose any biological resources that may occur on site. Based on CDFW's review of aerial imagery, the California Natural Diversity Database (CNDDB; CDFW 2026) and a site visit conducted on

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

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June 12, 2025, the Project site is largely undeveloped and appears to support a mixture of non-native grasslands and disturbed habitat.

Based on CDFW's review of the CNDDDB, the following species were detected or have the potential to occur within the Project site:

Plants:

- thread-leaved brodiaea (*Brodiaea filifolia*; ESA-listed threatened, CESA-listed endangered, CRPR 1B.1)

Invertebrates:

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

CNDDDB records indicate the entire Project site is within U.S. Fish and Wildlife Service (USFWS)-designated critical habitat for thread-leaved brodiaea and supports one of the few remaining unconserved populations of the species within the City. WRA Environmental Consultants (WRA) conducted a rare plant survey within the Project area in spring 2024 and documented 528 thread-leaved brodiaea plants on site (WRA 2024). RECON Environmental, Inc. (RECON) conducted an updated rare plant survey within the Project area in 2025; however, the survey results have not yet been provided to CDFW for review.

Additionally, per communication with RECON, a habitat assessment and focused protocol-level survey for Crotch's bumble bee were conducted within the Project area in 2025. No Crotch's bumble bees were detected during the surveys.

Project History: Since 2025, CDFW has been coordinating with the City and Proponent on the Project's proposed impacts to thread-leaved brodiaea and subsequent measures to avoid, minimize, and mitigate impacts to the species.

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.

Specific Comments

- 1) Cumulative Impacts. The DEIR should discuss and analyze cumulative impacts of the Project, considering geographical proximity and similar impacts of the Oakcrest Specific Plan, San Marcos Creek Specific Plan, and Pacific Specific Plan. Given several development projects are being pursued by the City for which CDFW is acting as a Responsible and Trustee Agency under CEQA, CDFW recommends the DEIR include an analysis and discussion of whether the Project's impacts to biological resources are cumulatively considerable. "Cumulatively considerable" means the incremental effects of

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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 impacts should be supported by evidence to make those conclusions. Specifically, if the City concludes the Project would not result in cumulative impacts on 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)).

- 2) Project Design. CDFW recommends the DEIR include a discussion of Project design and configuration in relation to existing open space areas and biological resources. The discussion should confirm whether development areas will be consolidated and sited within the least sensitive biological resource areas. CDFW recommends reducing or clustering the development footprint to maximize the protection of the remaining grasslands for sensitive plants and wildlife which provide valuable connectivity for wildlife between properties .
- 3) Thread-leaved Brodiaea. CNDDDB records indicate USFWS-designated critical habitat for thread-leaved brodiaea overlaps the entire Project area (CDFW 2026). Additionally, 528 thread-leaved brodiaea plants were documented within the Project area during focused rare plant surveys conducted in 2024 (WRA 2024). Thread-leaved brodiaea is listed as an endangered species under the California Endangered Species Act (CESA) and take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). CDFW recommends the DEIR fully analyze the extent of presence of thread-leaved brodiaea within the Project area and evaluate the Project's direct, indirect, and cumulative impacts to the species. Additionally, the extent to which designated critical habitat will be lost or impacted should also be evaluated. The DEIR should also identify feasible measures to avoid, minimize, and mitigate impacts from the proposed project.

CDFW appreciates the City's and Proponent's early scoping efforts for potential impacts to thread-leaved brodiaea. We look forward to continuing coordination on a CESA Incidental Take Permit application at the appropriate time.

- 4) Nesting Birds and Raptors. CDFW recommends vegetation clearing activities occur outside of the avian nesting season, which generally runs from February 1 through September 15 (as early as January 1 for some raptors). If Project construction is necessary during the avian nesting season, a qualified biologist with experience conducting nesting 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 should be established between the construction activities and the nest so nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 100-foot buffer from common avian species, 300 feet for listed or

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highly sensitive, and 500 feet for raptors. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction should occur within the fenced nest 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 the Project. 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.

- 5) Artificial Nighttime Lighting. The DEIR should discuss the biological impacts associated with artificial nighttime lighting to be utilized or installed during Project construction and/or operation. CDFW recommends the Project avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. If infeasible, any nighttime lighting should be directed downwards and shielded away from adjacent open space areas; this includes lighting associated with Project activities as well as any permanent lighting in the development.
- 6) Fuel Modification Zones. The City should ensure defensible space is provided and accounted for within proposed development areas and not accounted for as adjacent open space or conservation lands. The DEIR should include a thorough discussion of the following elements: (1) if fuel modification zones are being proposed as mitigation to offset impacts associated with the Project; and (2) if conserved open space is also proposed to serve as defensible space. Please note that lands proposed to be managed for defensible space purposes will have lower conservation resource value as they require on-going vegetation management.
- 7) Use of Native Plants and Trees. CDFW recommends the City require the Proponent to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project, especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, exotic, or invasive species for landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the [California Invasive Plant Council](https://www.cal-ipc.org/plants/inventory/)³ 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 oaks (*Quercus* spp.), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with

³ <https://www.cal-ipc.org/plants/inventory/>

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high insect and pollinator value.

General Comments

- 1) 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).
- 2) 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 proposed Project along with the purpose and need for the project.
 - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on 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 on 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. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. 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.

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- 3) Baseline Biological 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, with special emphasis on 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](#)⁴.
 - 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](#)⁵. 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 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](#)

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

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

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[California Vegetation](#)⁶, 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](#)⁷ (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](#)⁸ 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 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 build out could occur over a protracted time frame or in phases.

⁶ <https://vegetation.cnps.org/>

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

⁸ <https://wildlife.ca.gov/conservation/survey-protocols>

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- 4) Direct and Indirect Impacts on 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 and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on 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 on, 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 the potential water extraction activities and the potential resulting impacts on 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.
- 5) 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 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

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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.

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](#)⁹ 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](#)¹⁰.

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.)

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

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

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP 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.gov¹¹.

Sincerely,

Signed by:

AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

ATTACHMENTS

A. Figure 1. Project Location

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

United States Fish and Wildlife Service
Jonathan Snyder, jonathan_d_snyder@fws.gov

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REFERENCES

California Department of Fish and Wildlife. (2017). *Terrestrial and Vernal Pool Inverts of Conservation Priority List*. Available at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=149499&inline>

California Department of Fish and Wildlife. (2026). *California Natural Diversity Database* (webpage). Available at: <https://wildlife.ca.gov/Data/CNDDB>

¹¹ Email: Alison.Kalinowski@wildlife.ca.gov

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

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. Available at: <https://www.xerces.org/sites/default/files/2019-10/CESA-petition-Bombus-Oct2018.pdf>

Thorp, R. W., Horning, D. S., Jr., & Dunning, L. L. (1983). *Bumble bees and cuckoo bumble bees of California (Hymenoptera: Apidae)*. Bulletin of the California Insect Survey, 23, 1–79. Available at: <https://essig.berkeley.edu/documents/cis/cis23.pdf>

WRA Environmental Consultants (WRA). 2024. Rare Plant Survey Report San Marcos Mission Road Development.

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ATTACHMENT A: FIGURE 1. PROJECT LOCATION (SOURCE: City 2026)

