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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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November 21, 2025

Greg Johansen
City of San Diego
202 W. C. Street, 5th Floor M.S. 413
San Diego, CA 92101
gjohansen@sandiego.gov

Subject: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT for the Montgomery Gibbs Executive Airport Master Plan Program, SCH No. 2019029034, San Diego County, CA

Dear Greg Johansen:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Programmatic Environmental Impact Report (DPEIR) from the City of San Diego (City) for the Montgomery Gibbs Executive Airport Master Plan Program (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

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

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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[2] 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.). The City participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Implementing Agreement (IA). CDFW issued the City's NCCP permit in 1997 (SCH No. 93121073). The Multi-Habitat Planning Area (MHPA) identified in the SAP delineates core biological resource areas and corridors targeted for conservation. The DPEIR for the proposed Project must ensure that all requirements and conditions of the SAP and IA are met. The DPEIR should also address any biological issues that are not addressed in the SAP and IA, such as specific impacts to, and mitigation requirements for, sensitive species that are not covered by the SAP and IA.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego (City)

Objective: The proposed Airport Master Plan (AMP, or Project) is a long-range, strategic development plan based on forecasted activity for the Montgomery Gibbs Executive Airport (MYF). The AMP will serve as a decision-making tool and is intended to complement other local and regional plans and ensure compliance with current Federal Aviation Administration (FAA) standards. The AMP includes documentation of existing conditions, a forecast of activity, airport needs based on that forecast, an evaluation of alternatives to meet those needs, and a funding plan for future development. The Airport Layout Plan (ALP) graphically depicts all planned development at the airport, broken down into three phases (Phase 1 Near-Term, Phase II Mid-Term, and Phase III Long-Term) within the AMP's 20-year planning horizon.

Location: The approximately 550-acre MYF (of which 487.3 acres is included in the AMP Area) is owned and operated by the City Airports Division as a general aviation airport. It is located within the Kearny Mesa community north of Aero Drive, east of SR 163, south of Balboa Avenue, and west of Ruffin Road. Portions of the airfield subject to private leases are not part of the AMP, including any future expansion of the San Diego Fire Department station within airport property, and are not addressed by the DPEIR.

[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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Biological Setting: Per the Biological Technical Report (BTR; Helix Environmental Planning Inc. 2025), while parts of the Project site are developed (157.5 acres) there are areas of the property that support sensitive habitats such as coastal sage scrub (97.8 acres), chamise chaparral (5.4 acres) and nonnative grassland (155.5 acres). The Project site also includes an extensive complex of vernal pools (9.28 acres) that support several species covered by the City's Vernal Pool Habitat Conservation Plan (VPHCP). Additionally, portions of the western, northern, and eastern AMP Area are designated as hardline MHPA pursuant to the MSCP SAP and VPHCP.

Focused species surveys were not conducted prior to development of the DPEIR. Sensitive plant and wildlife species known or expected to occur within the Project site were compiled from prior survey data or other City documentation, including the VPHCP, and are listed below[3]. Project-level focused surveys would be required as separate project components move forward.

Plants

- graceful tarplant (*Holocarpha virgata* ssp. *elongata*; CRPR 4.2)
- Nuttall's scrub oak (*Quercus dumosa*; CRPR 1B.1)
- Orcutt's brodiaea (*Brodiaea orcuttii*; CRPR 1B.1, MSCP-covered)
- San Diego barrel cactus (*Ferocactus viridescens*; CRPR 2B.1, MSCP-covered)
- San Diego goldenstar (*Bloomeria clevelandii*; CRPR 1B.1; MSCP-covered)
- San Diego mesa mint (*Pogogyne abramsii*; ESA-endangered, CESA-endangered, CRPR 1B.1, MSCP- and VPHCP-covered [Narrow Endemic])

Invertebrates

- Crotch's bumble bee (*Bombus crotchii*; CESA candidate)
- San Diego fairy shrimp (*Branchinecta sandiegonensis*; ESA-endangered; MSCP- and VPHCP-covered)

Amphibians/Reptiles

- Coronado skink (*Plestiodon skiltonianus interparietalis*; WL)
- orange-throated whiptail (*Aspidoscelis hyperythra*; WL, MSCP-covered)
- San Diego horned lizard (*Phrynosoma coronatum blainvillii*; SSC, MSCP-covered)
- western spadefoot (*Spea hammondii*; ESA candidate, SSC, petitioned for listing under CESA)

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

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Birds

- California horned lark (*Eremophila alpestris actia*; WL)
- coastal California gnatcatcher (*Polioptila californica californica*; ESA-threatened, SSC, MSCP-covered)
- Cooper's hawk (*Astur cooperii*; WL, MSCP-covered)
- least Bell's vireo (*Vireo bellii pusillus*; ESA-endangered, CESA-endangered, BCC, MSCP-covered)
- loggerhead shrike (*Lanius ludovicianus*; BCC, SSC)
- Northern harrier (*Circus cyaneus*; SSC, MSCP-covered)
- sharp-shinned hawk (*Accipiter striatus*; WL)
- southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL, MSCP-covered)
- western burrowing owl (*Athene cunicularia*; burrowing owl; BCC, SSC, CESA candidate, MSCP-covered)
- white-tailed kite (*Elanus leucurus*, FP)

Mammals

- San Diego desert woodrat (*Neotoma lepida intermedia*; SSC)

Per the DPEIR, the Project is anticipated to impact two vernal pools within the MHPA, including one that contains San Diego mesa mint, and eight vernal pools that contain San Diego fairy shrimp (one of which is in the MHPA). Impacts within the MHPA are related to two project components: (1) the Medium Intensity Approach Lighting System (MALSR) and (2) a new hold bay adjacent to Taxiway A. As outlined in the DPEIR, unavoidable impacts to vernal pools or VPHCP-covered species within the Project area would require a minor amendment process in accordance with Section 8.4.3 of the VPHCP.

Project History: CDFW and the United States Fish and Wildlife Service (USFWS; collectively, the Wildlife Agencies) previously submitted a comment letter in response to the Notice of Preparation (NOP) for the Project on March 8, 2019. Our comment letter recommended consistency with the City's MSCP SAP and VPHCP and coordination with the Wildlife Agencies on AMP development.

COMMENTS AND RECOMMENDATIONS

The DPEIR analyzes potential impacts at a programmatic level and provides a foundation for second-tier CEQA documents for subsequent projects but does not analyze the project-specific impacts of individual projects. These analyses will be performed on individual project sites as each future project moves forward. CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources, and to ensure regional

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conservation objectives in the City's SAP and VPHCP would not be impacted by implementation of the Project. Additional comments or other suggestions are also included to improve or provide clarification in the Final PEIR.

COMMENT # 1: Western spadefoot

Issue: The proposed Project could impact western spadefoot.

Specific impact: Project activities could result in direct injury or mortality (e.g., trampling, crushing) during construction activities, as the PEIR does not include avoidance and minimization measures to limit work during the wet season. The Project may also result in loss of breeding, foraging, and burrowing habitat. Western spadefoot may also be negatively affected by night-time construction and new artificial light sources within suitable habitat.

Why impact would occur: The Project area contains suitable habitat for western spadefoot and it has been recorded on site (Helix 2025). As currently proposed, the Project does not limit construction activities during the wet season when ephemeral ponding is present on site and western spadefoot may be more active. Western spadefoots are nocturnal, burrowing anurans that breed in ephemeral pools (e.g., vernal pools, road ruts) and occupy adjacent upland habitats such as open, patchy scrublands and grasslands (Halstead et al. 2021, Rose et al. 2022). They use small mammal burrows, but are also capable of digging into soft substrates, and emerge at night to forage. Western spadefoot can be active all year long, although the peak active period typically falls during wet periods between January and June when conditions are favorable (Alvarez and Woodall 2024). This species appears to occupy shallow burrows during much of the year, which makes them especially susceptible to injury or mortality from minor ground disturbance and habitat alteration.

The Project also proposes installation of new light sources within suitable western spadefoot habitat which has the potential to disrupt the natural physiology, behavior, and ecology of nocturnal amphibian species (Perry et al. 2008). In addition, night-time construction is proposed for some project components (DPEIR, Table 3-6). Since this species is nocturnal, night-time construction has the potential to result in take of western spadefoot. The avoidance and minimization measures included in the DPEIR do not adequately address potential impacts to breeding, foraging, and estivation habitats within the Project area nor potential impacts of night-time construction.

Evidence impact may be significant: Western spadefoot is not a covered species under the City's MSCP SAP. On September 24, 2025, the California Fish and Game Commission (Commission) received a petition to list the northern and southern populations of western spadefoot as threatened and endangered species, respectively, under CESA (CFGC 2025). If the Commission determines the petitioned action may be warranted, western spadefoot will be designated as a candidate species pursuant to CESA, and as such will receive the same legal protection afforded to an endangered or threatened species (Fish & G. Code, § 2068). Take of any endangered, threatened,

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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).

Western spadefoot is also designated as a California Species of Special Concern, which meets the CEQA definition for rare, threatened, or endangered species (CEQA Guidelines, § 15380). Inadequate avoidance, minimization, and mitigation measures for impacts to special status species can result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendation is incorporated into the final CEQA document:

Recommendation #1: Western Spadefoot Avoidance and Minimization Measures. Despite known occurrences within the Project site, the DPEIR does not contain species-specific measures to offset potentially significant impacts to this species from Project-related activities. We recommend the following measures be added to the Final PEIR to avoid and minimize impacts to western spadefoot:

a. Prior to the start of any ground disturbance, construction, or site preparation activities, a qualified biologist will conduct focused surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during the peak activity period of January through June following the first rain event. An estimate of the total larval population for each pond within the proposed impact area and the total density for all impacted ponds will be recorded. Where occupied breeding habitat is present, we also recommend spring and early summer night-time upland survey efforts to determine the extent of adjacent uplands occupied by the species. If western spadefoot becomes listed under CESA, the results of these surveys should be included in second-tier CEQA documents for any subsequent activity that may impact western spadefoot to provide the basis for a potential Incidental Take Permit.

b. Where impacts are proposed within occupied western spadefoot habitat, construction work will be conducted during the dry season to avoid impacts to active breeding pools. Where work must occur adjacent to occupied western spadefoot habitat, the City shall consult with CDFW on potential wildlife exclusion measures that construction staff can use to minimize take of western spadefoot in the vicinity of construction activities. If occupied burrows are found, a 50-foot no-disturbance buffer shall be delineated around any western spadefoot burrow.

c. If avoidance of occupied western spadefoot habitat is not possible, and western spadefoot is not a candidate species or listed under CESA, an avoidance and relocation plan will be developed and submitted to CDFW for approval prior to the initiation of

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project activities. If western spadefoot becomes a candidate species or is listed under CESA and the Project may result in take of the species, the City will consult with CDFW on the need for an Incident Take Permit (ITP). Early consultation is encouraged as significant modification to a Project and mitigation measures may be required to obtain an ITP.

ADDITIONAL COMMENTS

Update Protection Status. The DPEIR does not accurately state the current protection status for burrowing owl and western spadefoot. In October 2024, the California Fish and Game Commission accepted a petition to list the burrowing owl under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Likewise, the DPEIR does not include the recent petition to list western spadefoot under CESA. CDFW recommends that the Final PEIR is updated to reflect the current CESA status for burrowing owl (CESA candidate) and western spadefoot (petitioned for listing under CESA).

Vernal Pool Mitigation Obligation. Per the DPEIR, the vernal pool that would be impacted by the new hold bay adjacent to Taxiway A was included in a larger restoration project undertaken as mitigation for unrelated, prior project impacts. However, the mitigation never received sign-off, leaving the previous project impacts with an outstanding mitigation obligation. CDFW recommends the City coordinate with the Wildlife Agencies to resolve this outstanding mitigation obligation prior to the initiation of impacts related to the new hold bay at Taxiway A.

Vernal Pool Avoidance and Minimization Measure. Section 5.2.4.5 of the PDEIR does not include a key vernal pool avoidance and minimization measure from Section 5.2.1 of the VPHCP. CDFW recommends that the Final PEIR include a measure that grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts to vernal pools and associated watersheds. After a rain even of greater than 0.2 inch, grading shall occur only after the soil surface has dried sufficiently (soil is dry to the touch both at the surface and 1 inch below) and no sooner than 2 days (48 hours) after the rain ends. If rain occurs during grading, work shall stop and resume only after soils are dry.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity

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Database (CNDDB). The CNDDB website[4] 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[5].

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

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Heather Schmalbach[6], Senior Environmental Scientist (Specialist).

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

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

[4] https://wildlife.ca.gov/Data/CNDDB
[5] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[6] Email: Heather.Schmalbach@wildlife.ca.gov

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Heather Schmalbach, Senior Environmental Scientist (Specialist)

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