



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
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*GAVIN NEWSOM, Governor*  
*CHARLTON H. BONHAM, Director*



June 16, 2025

Dawna Marshall  
City of San Diego  
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**Subject: DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT for the Southwest Village Specific Plan Project, SCH No. 2004051076, SAN DIEGO COUNTY, CA**

Dear Dawna Marshall:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Subsequent Environmental Impact Report (DSEIR) from the City of San Diego (City) for the Southwest Village 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 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.

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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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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 Permittee 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 of San Diego 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 City of San Diego's Multi-Habitat Planning Area (MHPA) identified in the SAP delineates core biological resource areas and corridors targeted for conservation. The DSEIR for the proposed Project must ensure that all requirements and conditions of the SAP and IA are met. The DSEIR 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:** Tri Pointe Homes IE-SD, Inc.

**Objective:** The Project will provide a comprehensive policy framework to guide future development buildout in the Southwest Village District. Anticipated Project activities include grading and construction for 5,130 residential dwelling units, mixed use buildings, public facilities (e.g., school, open space, parks, trails), and the extension of Beyer Boulevard as a secondary access road to the west. Offsite improvements are also anticipated, including roadway improvements to the north, modifying an existing dirt road for secondary emergency vehicle access (EVA) to the south, water and sewer facilities, and stormwater infrastructure (e.g. Spring Canyon drainage outfall).

Adoption of the Project will require an amendment to the City's General Plan and the Otay Mesa Community Plan. In addition, the Project includes a Boundary Line Adjustment (BLA) pursuant to the City's SAP, a Major Amendment to the City's Vernal Pool Habitat Conservation Plan (VPHCP), and a Biologically Superior Option (BSO) wetland deviation that are processed in coordination with the Wildlife Agencies. Construction of the Beyer Boulevard roadway will also require amendments to the

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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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existing conservation easements on West Otay Mesa A and B with approval of the Wildlife Agencies.

Development of the Project will be phased, so the DSEIR analysis includes both project-level and program-level components. The project-level components are more comprehensively analyzed, and address impacts associated with earlier development phases (Phases 1, 2, portion of 4) that will support future phases. These activities include grading and construction of Beyer Boulevard and up to 795 residential units, improvements to the southern EVA road, primitive trails, and infrastructure for stormwater and sewer facilities. The remaining program-level components will subsequently follow and will require a more comprehensive impact analysis to be conducted by the City prior to approval (Phases 3, 5-7, portion of 4).

**Location:** The 490-acre Project area is located within the City's Otay Mesa Community Plan area, north of the United States/Mexico international border, south of State Route 905, and east of Interstate 805. The Project area predominantly consists of undeveloped open space and canyons, with some smaller areas that are developed, agricultural, or disturbed. Surrounding land uses include residential and commercial development to the north, and undeveloped land to the east, west, and south. Several conserved properties occur within the northwestern portion of the Project area. These include the County of San Diego's Furby North Preserve, and two properties protected by conservation easements held by CDFW, referred to as West Otay Mesa A and West Otay Mesa B.

**Biological Setting:** Per the Biological Resources Report (BRR), the Project site is largely undeveloped land and encompasses a variety of land cover types including maritime succulent scrub (including disturbed), Diegan coastal sage scrub (including disturbed), native and non-native grasslands, eucalyptus woodland, disturbed land, agricultural land, and urban/developed land. The Project area also supports a variety of wetland habitats including vernal pools, mule fat scrub, southern willow scrub, tamarisk scrub, natural flood channel, disturbed riparian, and disturbed wetlands. A summary of total acreage by land cover type is included in Table 2a and 2b of the DSEIR. The Project area is within the "Otay Mesa" area described in the City's SAP and 15.25 acres of MHPA is designated on site. The MHPA also extends beyond the Project boundary to the north, east, south, and west. Additionally, the Project site is within the boundary of the City's VPHCP and contains 19.36 acres of 100 percent conserved lands (RECON 2025).

Several narrow endemic plant species were observed or have the potential to occur within the Project's impact area. These include Otay tarplant (*Deinandra conjugens*; Endangered Species Act (ESA)-listed Threatened, California Endangered Species Act (CESA)-listed Endangered, MSCP Covered), San Diego button-celery (*Eryngium aristulatum* var. *parishii*; ESA-listed Threatened, CESA-listed Endangered), thread-leaved brodiaea (*Brodiaea filifolia*; ESA-listed Threatened, CESA-listed Endangered, MSCP Covered), snake cholla (*Cylindropuntia californica* var. *californica*; California

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Rare Plant Rank (CRPR) 1B.1, MSCP Covered), and variegated dudleya (*Dudleya variegata*; CRPR 1B.2, MSCP Covered).

Sensitive wildlife species that were observed or have the potential to occur within the Project's impact area include coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed Threatened, California Species of Special Concern (SSC), MSCP Covered), least Bell's vireo (*Vireo bellii pulchellus*; ESA-listed Endangered, CESA-listed Endangered, MSCP Covered), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; SSC, MSCP Covered), western burrowing owl (*Athene cunicularia*; CESA Candidate Species, MSCP Covered), white-tailed kite (*Elanus leucurus*; California Fully Protected Species), yellow-breasted chat (*Icteria virens*; SSC), yellow warbler (*Setophaga petechia*; SSC), Crotch's bumble bee (*Bombus crotchii*; CESA Candidate Species), San Diego fairy shrimp (*Branchinecta sandiegonensis*; Endangered Species Act (ESA)-listed Endangered, MSCP Covered, VPHCP Covered), Riverside fairy shrimp (*Streptocephalus wootoni*; ESA-listed Endangered, MSCP Covered, VPHCP Covered), Quino checkerspot butterfly (*Euphydryas editha quino*; ESA-listed Endangered; Quino), western spadefoot toad (*Spea hammondi*; Proposed ESA-listed Threatened, California Species of Special Concern (SSC)).

Per Table 8a the BRR, the Project will directly impact 218.60 acres of land including 187.6 acres of sensitive upland vegetation and 2.46 acres of wetland vegetation (RECON 2025; Attachment A). Mitigation for impacts to sensitive habitat types is provided following the mitigation ratios established in the City's SAP and Biology Guidelines and summarized in Tables 15a and 18a of the BRR (RECON 2025; Attachments B and C). Overall, the Project will preserve approximately 208.3 acres of habitat within and adjacent to the Project area as shown in Figure 5.4-9 of the DSEIR (Attachment D). The Project's mitigation package also incorporates several habitat restoration efforts to increase native grassland habitat for the benefit of burrowing owl and Otay tarplant; restore and establish vernal pools with an added focus on Quino and western spadefoot; and restoration of upland habitat for the benefit of coastal cactus wren and Crotch's bumble bee (RECON 2025; Attachments D and E). Additionally, the Project will salvage and translocate San Diego barrel cactus (*Ferocactus viridescens*; CRPR 4.2, MSCP Covered) and snake cholla from the impact area into the mitigation lands.

The Project's BLA will result in a net gain of 3.19 acres overall and a gain of 4.06 acres of sensitive vegetation communities within the MHPA post-restoration. The Project's BSO wetland deviation will also create and enhance 1.45 acres of wetland habitat within Spring Canyon for the benefit of least Bell's vireo, yellow-breasted chat, and yellow warbler and to ensure no net loss of wetland habitat. Post-restoration, the mitigation lands will be conveyed to the City for management in perpetuity as part of the MSCP preserve system, except for the off-site cactus wren restoration area to the north that will be managed by the County of San Diego.

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The Beyer Boulevard roadway will bisect a portion of the MHPA that is intended to serve as a north-south wildlife corridor. To offset impacts to wildlife connectivity, the roadway design was narrowed down from four lanes to two lanes during discussions with CDFW and the United States Fish and Wildlife Service (USFWS; collectively, the Wildlife Agencies) and was designed to incorporate three wildlife under crossings and one overcrossing to facilitate wildlife movement. The constructed slopes along the roadway will be revegetated with native habitat and wildlife fencing will be installed to direct wildlife usage toward the crossings to reduce road mortalities. The wildlife fencing and habitat areas along the roadway will be managed in perpetuity by the City of San Diego.

**Project History:** CDFW previously submitted a comment letter in response to the Notice of Preparation of a DEIR for the Project on March 26, 2020 (CDFW 2020). Since 2020, the Wildlife Agencies have been in negotiations with the City on reconfiguring the Project to avoid, minimize, and mitigate impacts to natural resources and conserved lands (including CDFW-held conservation easements) to ensure consistency with the SAP and regional conservation goals. CDFW has provided extensive feedback on project design, impacts, and proposed mitigation through coordination meetings and site visits throughout the Project area. In January 2025, CDFW provided written concurrence on the Project's proposed Boundary Line Adjustment and Biologically Superior Option (CDFW, 2025). Early consultation on the Project's Lake and Streambed Alteration Agreement notification was initiated in July 2024 and early consultation on the Project's CESA Incidental Take Permit Application for Crotch's bumble bee is ongoing.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources, and to ensure regional conservation objectives in the City's SAP and VPHCP would not be undermined by implementation of the Project. Our comments are limited to the project-level components of the DSEIR. Additional comments or other suggestions are also included to improve the document.

### **COMMENT # 1: Mitigation Schedule**

**Issue:** The DSEIR does not clearly discuss the timing of mitigation relative to the timing of Project impacts. This disclosure is necessary so CDFW can provide comments on the adequacy and feasibility of the proposed mitigation.

**Specific impact:** Habitat mitigation for impacts to fish and wildlife resources should always precede development to maintain rough proportionality. Development of the Project and completion of associated mitigation will be phased over an unknown timeframe which, without clear agreement on both the timing and process of mitigation phases, may result in deferred or inadequate mitigation for sensitive resources above a level of significance. The Project incorporates several interrelated species-specific

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mitigation plans which may be more biologically appropriate if completed together, rather than parsed by phases. Additionally, it is unclear how the mitigation lands will be protected and managed in between phases to ensure that conservation is proceeding in rough step with development.

**Why impact would occur:** Absent clear agreement on the approach to satisfying mitigation requirements to stay ahead of the Project's impacts, the Project's phased impacts may not be roughly proportional to the mitigation that is required to offset those impacts. PR-BIO-15 of the DSEIR describes the overall dedication of mitigation lands that the Project Proponent will provide but only generally ties those dedications to "...prior to issuance of the first grading permit within each phase" without clarifying how the habitat type, species function, and acreage of mitigation in each phase corresponds to the specific impacts occurring at that time. Additionally, several sensitive species will be impacted by habitat loss within multiple development phases, which may occur sequentially or at the same time. Because many species-specific impacts span multiple development phases, the phased mitigation approach may not be feasible or biologically appropriate. These species include western burrowing owl, Crotch's bumble bee, Quino checkerspot butterfly, western spadefoot toad, coastal California gnatcatcher, San Diego fairy shrimp, San Diego barrel cactus, and snake cholla. The DSEIR generally describes the total acreages of habitat mitigation and which will have a net benefit to sensitive species. However, it is unclear how the City will ensure conservation is proceeding in rough step with development and that mitigation lands will be protected and managed in-between phases.

As a specific example, the Project proposes to salvage and translocate San Diego barrel cactus and snake cholla from the impact areas to the restoration sites for cactus wren and vernal pools. Both plant species occur within all the development phases (Phases 1, 2, 4, and Beyer Blvd) and will rely on the two mitigation sites to be ready to receive translocated individuals. However, given that impacts to coastal cactus wren are not anticipated until the construction of Beyer Boulevard, it is unknown whether the species-specific mitigation site would be delayed to later development phases and, if plants would be translocated on a phased schedule. Additionally, it is not clear if there would be interim site protection and management of the translocation sites which, absent such, could render the phased mitigation approach ineffective for the translocation of these species.

Additionally, the Crotch's bumble bee is presumed present within all the development phases and approximately 190 acres of suitable habitat will be impacted by the Project. From our preliminary Incidental Take Permit (ITP) discussions with the Project Proponent and City, it has been CDFW's understanding that mitigation lands for Crotch's bumble bee would be conserved as a whole and prior to any Project impacts rather than parsed out relative to development phases. To streamline the CESA ITP permitting process, CDFW strongly recommends that the Project Proponent in coordination with the City, consider jumpstarting mitigation for Crotch's bumble bee ahead of any impacts to avoid processing delays.

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**Evidence impact may be significant:** Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects using feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Additionally, formulation of mitigation measures shall not be deferred until some future time. Pursuant to CEQA Guidelines section 15126.4, an environmental document, "...*shall describe feasible measures which could mitigate for 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). Additionally, the mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994). Where the mitigation measure is an ad hoc exaction, it must be "roughly proportional" to the impacts of the project. *Ehrlich v. City of Culver City* (1996) 12 Cal.4th 854 (CEQA Guidelines, § 15126.4 (B)). If the DSEIR is unclear on mitigation timing, the Project may result in unmitigated impacts.

The City's IA also calls for habitat preservation to be in rough step with development to assure that adequate progress is made toward building out the MSCP preserve (Section 14; City of San Diego, 1997).

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

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

**Recommendation #1:** Enforceable Timing Triggers for Mitigation Implementation. The DSEIR should revise PR-BIO-15 and PR-BIO-16 (and associated mitigation plans) to include enforceable triggers outlining when species-specific mitigation should be completed and that no grading permit shall be issued for a subsequent phase until prior mitigation has been completed and are under interim management. The current language, which calls for phased dedication prior to issuance of the first grading permit within each Phase, does not ensure that the scale and function of mitigation is matched to the timing of impact or that species-specific needs are addressed.

**Recommendation #2:** Project Mitigation Phasing Schedule. The DSEIR should be updated to clarify the timing of mitigation relative to the project impacts. If the City anticipates mitigation will be implemented in phases, the DSEIR should include a table to summarize the anticipated mitigation components and timeline for each phase. The Mitigation Phasing Schedule should include how the mitigation would be jumpstarted at the beginning of construction along with showing milestones for when and where additional mitigation will occur to continually stay ahead of all impacts. The penultimate goal of this schedule will show how mitigation will be complete at the end of all project construction absent any post-construction compliance requirements.

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## **ADDITIONAL COMMENTS**

**Mitigation and Monitoring Reporting Plan.** CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a Mitigation Monitoring and Reporting Plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment F).

**Impacts to CDFW Conservation Easements.** Construction of the Beyer Boulevard roadway extension will directly impact two mitigation properties that are protected under conservation easements (CEs) held by CDFW. These two properties contain sensitive uplands, vernal pools, and wetlands habitat. Both properties served as prior mitigation for several projects within the City's jurisdiction and the CEs were granted to CDFW because of The Environmental Trust's bankruptcy settlement in 2009. The proposed roadway is not compatible with the existing provisions of the CEs. The CE language strictly prohibits any activity or use of the property that is inconsistent with retaining the property in a natural condition and protecting its natural resources in perpetuity. The proposed impacts to both properties will require amendments to the CEs. CDFW acknowledges that the DSEIR appropriately outlines the regulatory pathway to amend the existing conservation easements and that a replacement conservation easement of greater or equivalent value is needed to offset the impacts associated with the construction of Beyer Boulevard on prior mitigation lands.

On page 3-60 of the DSEIR, we noted an error regarding the overall anticipated replacement CE acreage, in that the City anticipates a "...208-acre area of sensitive vegetation communities would be provided in a replacement conservation easement to offset the proposed 15.64-acre of impacted conservation easement area". This statement is misrepresentative of the anticipated CE replacement acreage. In our discussions with the City, CDFW has conveyed that the replacement conservation easement area will need to be of greater or equivalent value in terms of acreage (15.64 acres) and function, at minimum, to offset the impact to mitigation lands. Additionally, the CE would encompass the acreage to appropriately mitigate the impacts from the Project itself. However, we have not yet identified the final replacement conservation area and acreage. We recommend that this section in the DSEIR be updated to reflect that we are still in the process of identifying the appropriate offset area and acreage in consultation with the Wildlife Conservation Board.

**Impacts to Quino checkerspot butterfly.** The Project will directly impact Quino checkerspot butterfly by removing 0.93 acre of suitable host and nectar plants. Quino is not a Covered Species under the City's SAP or VPHCP; therefore, impacts to Quino

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and their habitat were not anticipated, analyzed, or authorized in the City's NCCP permit. Mitigation Measure (MM)-PR-BIO-5 states that formal consultation with USFWS through ESA Section 10 will be required to confirm adequate mitigation for impacts to Quino. Please note that the California Fish and Game Commission (Commission) received a [petition](#)<sup>3</sup> to list Quino as an endangered species under CESA on December 18, 2024. CDFW recently submitted a [Petition Evaluation for Quino Checkerspot Butterfly](#)<sup>4</sup> to the Commission stating that listing of Quino may be warranted under CESA (CDFW, 2025). If the Commission accepts the petition and Quino advances to CESA candidacy, the Project Proponent, in coordination with the City, should work with CDFW to obtain State Incidental Take Authorization to address Project-related impacts to Quino.

Appropriate take authorization from CDFW under CESA may include an Incidental Take Permit (ITP) or a Consistency Determination as the species is listed under the ESA, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP. It is important that the take proposed to be authorized by CDFW's ITP be described in detail in the Project's CEQA document. Also, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.

While it is still early in the CESA petition process, CDFW highly recommends updating the Draft Subsequent EIR to include the Quino checkerspot butterfly's new petition status and revising MM-PR-BIO-5 to state that CESA take authorization may be needed if the petition is accepted by the Commission.

## **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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<sup>3</sup> Quino Checkerspot Butterfly Petition: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=228103>

<sup>4</sup> CDFW Petition Evaluation: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232637>

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Database (CNDDDB). The [CNDDDB website](#)<sup>5</sup> provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)<sup>6</sup>.

The City should ensure data collected for the preparation of the DSEIR 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 DSEIR 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 Alison Kalinowski<sup>7</sup>, Environmental Scientist.

Sincerely,

Signed by:

  
AD7D070BCB66466...

Glen M. Lubcke  
Environmental Program Manager  
South Coast Region

## **ATTACHMENTS**

<sup>5</sup> <https://wildlife.ca.gov/Data/CNDDDB>

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

<sup>7</sup> Phone: 858-775-6320; Email: [alison.kalinowski@wildlife.ca.gov](mailto:alison.kalinowski@wildlife.ca.gov)

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Attachment A: Biological Resources Report, Table 8a. Direct Impacts to Vegetation Communities within the Project Area

Attachment B: Biological Resources Report, Table 15a. Upland Habitat Mitigation

Attachment C: Biological Resources Report, Table 18a. Wetland Mitigation

Attachment D: Biological Resources Report, Table 10. Mitigation and Project Design Summary

Attachment E: Biological Resources Report, Figure 51 Mitigation and Project Design Features Aerial

Attachment F: Draft Mitigation Monitoring and Reporting Program

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## REFERENCES

California Department of Fish and Wildlife. March 2020. Comments on the Southwest Village Specific Plan Project Notice of Preparation of a Supplemental Environmental Impact Report SCH#2004051076.

California Department of Fish and Wildlife. January 2025. Multi-Habitat Planning Area Boundary Line Adjustment and Biologically Superior Option Wetland Deviation for the Southwest Specific Plan, Project 614791, San Diego, California.

City of San Diego. 1997. Multiple Species Conservation Program City of San Diego MSCP Subarea Plan.

City of San Diego. 2019. Revised Final City of San Diego Vernal Pool Habitat Conservation Plan.

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County of San Diego. 1998. Final Multiple Species Conservation Program (MSCP) Plan.

RECON Environmental, Inc. March 2025. Biological Resources Report for the Southwest Village Specific Plan San Diego, California Project No. 614791.

**ATTACHMENTS**

**ATTACHMENT A: TABLE 8A. DIRECT IMPACTS TO VEGETATION COMMUNITIES WITHIN THE PROJECT AREA (RECON 2025)**

Table 8a Direct Impacts to Vegetation Communities/Land Cover Types within the Project level Survey Areas Assuming an MHPA BLA (acres)								
Vegetation Communities/ Land Cover Types	City of San Diego Tier	Phase 1	Phase 2	Beyer Boulevard	Phase 4	Emergency Vehicle Access Road	Off-site Improvements	Total Acres
<b>Upland Vegetation Communities</b>								
Maritime Succulent Scrub	I	4.72	6.51	13.88	2.38	0.87	-	28.35
Disturbed Maritime Succulent Scrub	I	5.15	1.58	1.85	0.53	-	-	9.12
Native Grassland	I	-	-	-	0.12	-	-	0.12
Diegan Coastal Sage Scrub	II	24.19	1.62	3.17	4.25	0.01	-	33.24
Disturbed Coastal Sage Scrub	II	8.19	-	0.62	1.29	0.83	-	10.93
Non-native Grassland	IIIB	42.14	57.26	2.48	3.81	0.16	-	105.84
<i>Subtotal</i>		<i>84.38</i>	<i>66.97</i>	<i>21.99</i>	<i>12.38</i>	<i>1.87</i>	<i>-</i>	<i>187.59</i>
<b>Wetland Vegetation Communities</b>								
Natural Flood Channel <sup>1</sup>	-	0.14	0.05	0.08	0.18	-	-	0.46
Mule Fat Scrub	-	0.02	-	0.30	0.01	-	-	0.33
Southern Willow Scrub	-	0.32	-	-	<0.01	-	-	0.33
Tamarisk Scrub	-	-	0.01	-	-	-	-	0.01
Disturbed Riparian	-	0.12	-	-	-	-	-	0.12
Disturbed Wetland	-	0.30	0.04	<0.01	-	-	-	0.34
Vernal Pool	-	0.15	0.07	0.03	-	0.01	-	0.26
Vernal Pool with Fairy Shrimp	-	0.56	0.05	0.01	<0.01	-	-	0.62
<i>Subtotal</i>		<i>1.62</i>	<i>0.23</i>	<i>0.41</i>	<i>0.20</i>	<i>0.01</i>	<i>-</i>	<i>2.46</i>
<b>Disturbed/Developed Vegetation Communities</b>								
Eucalyptus Woodland	IV	0.13	-	-	-	-	-	0.13
Disturbed Land	IV	8.48	5.61	5.49	1.90	1.23	0.51	23.22
Urban/Developed Land	-	0.30	-	0.12	-	0.05	4.73	5.20
<i>Subtotal</i>		<i>8.92</i>	<i>5.61</i>	<i>5.61</i>	<i>1.90</i>	<i>1.28</i>	<i>5.23</i>	<i>28.55</i>
<b>Total</b>		<b>94.92</b>	<b>72.80</b>	<b>28.01</b>	<b>14.48</b>	<b>3.16</b>	<b>5.23</b>	<b>218.60</b>

NOTE: Totals may not add due to rounding. Phasing corresponds to grading phasing depicted in Figure 10.1.  
<sup>1</sup>Although ephemeral drainages are not considered a vegetation community, they are captured within the City's designation of "natural flood channel." Note that these are non-wetland waters not regulated by the City of San Diego.

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Attachment B: TABLE 15A. UPLAND HABITAT MITIGATION (RECON 2025).

Table 15a Mitigation Requirements and Proposed Mitigation for Project Level Sensitive Upland Vegetation Community Impacts with Mitigation Occurring Inside the MHPA Assuming an MHPA BLA (acres)										
Vegetation Communities/ Land Cover Types	City of San Diego Tier	Phase 1	Phase 2	Beyer Boulevard	Phase 4	Emergency Vehicle Access Road	Off-site Improvements	Total Mitigation Required <sup>1</sup>	Proposed Upland Mitigation (acres) <sup>2,3</sup>	Mitigation Difference <sup>4</sup>
<b>Upland Vegetation Communities</b>										
Maritime Succulent Scrub	I	4.72	6.50	25.13	2.38	0.87	-	39.60	89.94	+50.34
Disturbed Maritime Succulent Scrub	I	5.15	1.59	2.63	0.53	-	-	9.90	24.82	+14.92
Native Grassland	I	-	-	-	0.12	-	-	0.12	-	-0.12
Diegan Coastal Sage Scrub	II	24.19	1.62	6.26	4.25	0.01	-	36.33	24.93	-11.40
Disturbed Coastal Sage Scrub	II	8.19	-	0.74	1.29	0.83	-	11.05	2.36	-8.69
Non-native Grassland	IIIB	21.07	29.46	3.71	1.91	0.08	-	56.23	18.89	-37.34
<b>Total</b>		<b>63.32</b>	<b>39.17</b>	<b>38.47</b>	<b>10.48</b>	<b>1.79</b>	<b>-</b>	<b>153.23</b>	<b>160.94</b>	<b>+7.71</b>

NOTE: Totals may not add due to rounding. Phasing corresponds to grading phasing depicted in Figure 10.1.

<sup>1</sup>Impacts would be mitigated consistent with the Biology Guidelines mitigation ratios for impacts within or outside the MHPA. All mitigation is proposed inside the MHPA, all impacts occur outside of the MHPA except a 0.37 linear utility portion of Beyer Boulevard that would remain in MHPA (see Table 17d); Mitigation requirement incorporates the additional 1:1 ratio added to the City's standard mitigation ratio for upland impacts within the Furby North Preserve, West Otay Mesa A and West Otay Mesa B, as detailed in Table 17d.

<sup>2</sup>Mitigation acreages exclude all portions of the Spring Canyon drainage that are part of the wetland restoration plans for Southwest Village and Nakano projects, the trail restoration corridor, the vernal pool restoration area, and Otay Tarplant/Native Grassland restoration area.

<sup>3</sup>In addition to the total 160.94 acres of mitigation proposed to offset impacts to sensitive uplands, the proposed mitigation lands include 7.12 acres of disturbed lands, 0.34 acre of natural flood channel (drainages), 0.30 acre of disturbed wetland, 0.46 acre of tamarisk scrub, 0.02 acre of vernal pool, and 0.76 acre of vernal pool with fairy shrimp totaling 169.94 acres.

<sup>4</sup>Impacts to Tier II and Tier IIIB sensitive upland vegetation would be mitigated by up-tiering to Tier I maritime succulent scrub; 0.18 acre of the excess maritime succulent scrub mitigation would be used to address indirect noise impacts to 0.09 acre of Diegan coastal sage scrub habitats (see Section 8.2.6.2.b).

Attachment C: TABLE 18A. WETLAND MITIGATION (RECON 2025)

Table 18a Mitigation Requirements for Direct Impacts to City of San Diego Wetlands										
Grading Phase	Disturbed Wetland			Vernal Pool			Wetland			Mitigation Total
	Impact (acres)	Mitigation Ratio	Mitigation Required	Impact (acres)	Mitigation Ratio	Mitigation Required	Impact (acres)	Mitigation Ratio	Mitigation Required	
<b>Phase 1</b>										
Southwind <sup>1</sup>	-	-	-	0.04	2:1	0.08	-	-	-	0.08
Development Footprint	0.07	2:1	0.14	0.63	2:1	1.26	-	-	-	1.40
Vernal pool with button celery <sup>2</sup>	-	-	-	0.01	3:1	0.03	-	-	-	0.03
<b>Phase 2</b>										
Development Footprint	0.04	2:1	0.08	0.12	2:1	0.24	-	-	-	0.32
<b>Beyer Boulevard</b>										
Beyer Park	-	-	-	-	-	-	0.35	2:1 <sup>3</sup>	0.70	0.70
Furby North	<0.01 (54 sq. ft.)	2:1	<0.01 (108 sq. ft.)	0.01 (264 sq. ft.)	2:1	0.02 (528 sq. ft.)	-	-	-	0.02
West Otay Mesa A	<0.01 (19 sq. ft.)	2:1	<0.01 (38 sq. ft.)	0.02 (847 sq. ft.)	2:1	0.04 (1,694 sq. ft.)	-	-	-	0.04
<b>Phase 4</b>										
Development Footprint	-	-	-	<0.01 (35 sq. ft.)	2:1	<0.01 (70 sq. ft.)	0.01 <0.01 (159 sq. ft.)	2:1 <sup>3</sup>	0.02	0.03
<b>EVA Road</b>										
Development Footprint	-	-	-	0.02	2:1	0.04	-	-	-	0.04
<b>Total</b>	<b>0.11</b>		<b>0.22</b>	<b>0.85</b>		<b>1.70</b>	<b>0.36</b>		<b>0.73</b>	<b>2.65</b>

NOTE: Totals may not add due to rounding.

<sup>1</sup>Mitigation would be implemented for impacts within the Southwind project area by the first project to proceed. If these impacts occur and are mitigated by another project, the impacts and mitigation obligations would be eliminated from this project.

<sup>2</sup>0.01 acre of vernal pool supports San Diego button-celery which requires a 3:1 mitigation ratio, per the VPHCP.

<sup>3</sup>Beyer Park wetlands are classified as mule fat riparian scrub which requires a 2:1 mitigation ratio. The wetlands within Phase 4 includes 0.004 acre (159 sq. ft.) of southern willow scrub which would be mitigated at a 3:1 ratio, whereas the remaining resources within Phase 4 are mule fat scrub which would be mitigated at a 2:1 ratio.

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ATTACHMENT D: TABLE 10. MITIGATION AND PROJECT DESIGN SUMMARY (RECON 2025)

Table 10 Mitigation and Project Design Feature Summary <sup>1</sup>										
Vegetation Communities	Cactus Wren Restoration Area	Upland Mitigation <sup>2</sup>	Otay Tarplant/ Native Grassland Restoration Area	Vernal Pool/ Quino Checkerspot Butterfly Restoration Area	Wetland Plan Mitigation <sup>3</sup>	Wetland Plan Project Design Features <sup>5</sup>	Additional Potential Habitat Preservation (Project Design)	Trail Restoration Area (Project Design) <sup>4</sup>	Furby North Replacement Land	Total
Maritime Succulent Scrub	0.72	89.94	-	0.94	-	-	43.35	2.18	7.80	144.93
Disturbed Maritime Succulent Scrub	1.82	24.82	-	-	-	0.76	24.59	1.86	-	53.85
Diegan Coastal Sage Scrub	-	24.93	-	4.52	-	0.03	13.66	0.41	-	43.55
Disturbed Coastal Sage Scrub	-	2.36	-	-	-	-	0.92	-	-	3.28
Non-native Grassland	-	18.89	0.93	26.13	0.75	0.44	6.16	6.02	-	59.32
Mule Fat Scrub	-	-	-	-	-	1.93	-	-	-	1.93
Natural Flood Channel	-	0.34	-	-	0.14	0.63	0.20	-	-	1.31
Southern Willow Scrub	-	-	-	-	-	0.21	-	-	-	0.21
Tamarisk Scrub	-	0.46	-	-	0.53	0.64	-	0.08	-	1.71
Disturbed Wetland	-	0.30	-	-	-	-	0.07	0.44	0.06	0.87
Vernal Pool	-	0.02	-	0.03	-	-	-	-	-	0.05
Vernal Pool with Fairy Shrimp	-	0.76	-	0.03	-	-	0.16	0.09	-	1.04
Disturbed Land	-	7.12	0.03	2.06	0.02	0.03	6.19	1.10	0.11	16.66
<b>Total</b>	<b>2.54</b>	<b>169.94</b>	<b>0.96</b>	<b>33.71</b>	<b>1.45</b>	<b>4.66</b>	<b>95.29</b>	<b>12.18</b>	<b>7.98</b>	<b>328.71</b>

NOTE: Totals may not add due to rounding; Refer to Figure 51

<sup>1</sup>All areas detailed above would be dedicated to the City of San Diego for long-term management except the Cactus Wren Mitigation Area would remain in County of San Diego ownership and would be managed by the County of San Diego. The Furby North Replacement Lands would be conveyed to the County in fee title and managed by the City consistent with the City's MSCP Subarea Plan (see Figure 52).

<sup>2</sup>The upland mitigation acreage reported includes disturbed land and wetland vegetation communities not proposed as uplands mitigation. Of the 169.94-acre upland mitigation area, a total of 153.23 acres of upland mitigation is provided to meet the mitigation requirements for impacts to sensitive upland vegetation communities (refer to Table 15a).

<sup>3</sup>Total proposed wetland mitigation as presented in the Southwest Village Wetland Plan is reported here (see Table 3 in Attachment 18). A portion of the Southwest Village wetland creation mitigation requirements will be implemented within the Nakano Wetland Plan (RECON 2024f). The Southwest Village Wetland Plan would require implementation of the 3.46-acre Nakano Plan area prior to implementation of the Southwest Village Plan area due to its upstream location. The first project to proceed would implement all components of the Nakano Plan.

<sup>4</sup>Disturbed land, non-native grasslands and disturbed uplands habitats within the Trail Restoration Area would be restored to Diegan coastal sage scrub or maritime succulent scrub habitat to support trail closures.

<sup>5</sup>Total proposed project design components as presented in the Southwest Village Wetland Plan is reported here (see Table 3 in Attachment 18). This includes an approximate 1.20 acre area of weed control and an additional 3.46-acre area associated with the Nakano Wetland Plan. The Southwest Village Wetland Plan would require implementation of the 3.46-acre Nakano Plan area prior to implementation of the Southwest Village Plan area due to its upstream location. The first project to proceed would implement all components of the Nakano Plan.



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ATTACHMENT F: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

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

Mitigation Measure	Timing	Responsible Party
<p><b>Recommendation #1: Enforceable Timing Triggers for Mitigation Implementation.</b> The DSEIR should revise PR-BIO-15 and PR-BIO-16 (and associated mitigation plans) to include enforceable triggers outlining when species-specific mitigation should be completed and that no grading permit shall be issued for a subsequent phase until prior mitigation has been completed and are under interim management. The current language, which calls for phased dedication prior to issuance of the first grading permit within each Phase, does not ensure that the scale and function of mitigation is matched to the timing of impact or that species-specific needs are addressed.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p><b>Recommendation #2: Project Mitigation Phasing Schedule.</b> The DSEIR should be updated to clarify the timing of mitigation relative to the project impacts. If the City anticipates mitigation will be implemented in phases, the DSEIR should include a table to summarize the anticipated mitigation components and timeline for each phase. The Mitigation Phasing Schedule should include how the mitigation would be jumpstarted at the beginning of construction along with showing milestones for when and where additional mitigation will occur to continually stay ahead of all impacts. The penultimate goal of this schedule will show how mitigation will be complete at the end of all project construction absent any post-construction compliance requirements.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>