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Governor's Office of Planning & Research

Apr 30 2021

April 30, 2021

STATE CLEARINGHOUSE

Norm Pedersen
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Development Services Department, Planning Division
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Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for Hallmark-Barham Specific Plan (Project) SCH #2021040009

Dear Mr. Pedersen:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from City of San Marcos (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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. (*Id.*, § 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 is also submitting comments 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 of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

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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CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City has prepared a draft NCCP Subarea Plan (SAP) under the San Diego Multiple Habitat Conservation Plan (MHCP), but this plan has not been formally adopted.

PROJECT DESCRIPTION SUMMARY

Proponent: Mariana McGrain, Hall Land Company, 740 Lomas Santa Fe Drive, Suite 204 Solana Beach, CA 92075

Objective: The Project will require a General Plan Amendment (GP20-0002), Specific Plan (SP20-0002), Rezone (RZ20-0001), Multi-Family Site Development Plan (MFSDP20-0001), Tentative Subdivision Map (TSM20-0001), a Conditional Use Permit (CUP20-0007) and a Grading Variance (GV20-0002). The Project will construct 151 multi-family residential units situated on approximately 10.6 acres. Residential buildings comprise approximately 2.8 acres of the Project site. Multi-family residential dwelling units include one, two, and three-story condominiums; overall building heights will not exceed 40 feet. Open space within the Specific Plan area will total approximately 5.35 acres. Common open space is divided into four components: common open space area with grades 10 percent or greater, common open space area with grades less than 10 percent, the water quality basin bioretention area, and recreational areas.

The Project will require a Grading Variance because it includes slopes exceeding 20 feet in height without benching. Areas where slopes are proposed to be greater than 20 feet include the southern extent of development (31.6-foot maximum slope height), a small area on the western edge of the Project site (25.8-foot maximum slope height), and a portion of the Project frontage along East Barham Drive (22.8-foot maximum slope height with 6-foot retaining wall). Due to granitic bedrock conditions, blasting and rock crushing may be required during the Project grading and site preparation activities. If required, blasting will occur in the northeast portion of the Project site. The Project will comply with all provisions identified in the City's Municipal Code section 17.60.06 as it relates to blasting and blasting shall only be permitted between the hours of 9:00 A.M. and 4:00 P.M. during any weekday. The Project approvals will also include a Conditional Use Permit, which would allow for the temporary use of the rock crusher.

Access to the Project site will be through two driveways on East Barham Drive which will provide an internal loop through the Project site and provide access to alleys. A secondary emergency-only access is provided through the western boundary of the Project site to connect to an existing emergency access driveway on the adjacent property, which connects to Saddleback Way and then to East Barham Drive. The southern end of the Project includes a 150-foot fuel modification buffer subject to vegetation management to reduce fire fuels. Construction materials will be stored on site.

Location: The Project site is located at 943 East Barham Drive, west of La Moree Road in the Barham/Discovery Community in the eastern portion of the City. The assessor parcel number (APN) is 228-310-0100. The Project vicinity is developed with primarily residential uses: the Mira Lago to the east; Williamsburg to the southeast; and the Walnut Hills II Specific Plan to the southwest. Designated open space is located south of the Project, along with a private community park/viewpoint, and additional residences within the Williamsburg residential development. The Grace Church and the Barham Park & Ride are located to the west. The northern boundary of the Project site is East Barham Drive, and immediately north of East Barham Drive is the Right-of-Way (ROW) for the State Route 78 (SR-78).

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Biological Setting: Preliminary biological analysis identifies the following sensitive habitats on site: Diegan coastal sage scrub (CSS), chaparral, and non-native grasslands. Special status wildlife species with the potential to occur near the Project include the coastal California gnatcatcher (*Polioptila californica californica*; federal Endangered Species Act (FESA)-threatened and State Species of Special Concern (SSC)). Special status plant species identified with the potential to occur include: San Diego thornmint (*Acanthomintha ilicifolia*; FESA- and California Endangered Species Act (CESA)-endangered), San Diego button-celery (*Eryngium aristulatum* var. *parishii*; FESA- and CESA-endangered), and spreading navarretia (*Navarretia fossalis*; FESA-threatened and California Native Plant Society (CNPS) rare plant rank 1B.1). Other sensitive plant species with the potential to occur near the Project include Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*; FESA-endangered and CNPS 1B.1), and wart-stemmed ceanothus (*Ceanothus verrucosus*; CNPS 2B.2).

Timeframe: The Project is expected to start construction in late 2022 with an occupancy date of spring 2025, assuming Project approvals are acquired in late 2021.

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. Based on the potential for the Project to have a significant impact on biological resources, CDFW agrees that a DEIR is appropriate for the Project.

Listed Species and California Species of Special Concern

1. A review of the California Natural Diversity Database (CNDDDB) and the Initial Study (IS) indicate historic presence of CESA-listed plants, including San Diego thornmint and San Diego button-celery, in the Project vicinity. Project related activities may adversely impact potential habitat for this species. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Take of any endangered, threatened, candidate species, or State-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project Proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subs. (b) and (c)). CDFW encourages early consultation because significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. 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 unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation, monitoring, and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation, monitoring, and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
2. CNDDDB includes detection of State Species of Special Concern and FESA-listed coastal California gnatcatchers in coastal sage scrub habitat to the west of the Project area. The DEIR should include a report of recent, seasonally appropriate, focused surveys for coastal California gnatcatcher in all areas with suitable habitat within and adjacent to the Project. Focused

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species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required to determine species presence under FESA. Acceptable species-specific survey procedures are detailed in *Coastal California Gnatcatcher (Poliioptila californica californica) Presence/Absence Survey Guidelines* (United States Fish and Wildlife Service (USFWS) 1997). If present, the DEIR should disclose potential impacts to the species as well as proposed avoidance and mitigation measures. CDFW considers impacts to federally threatened species a significant direct and cumulative adverse effect without the implementation of appropriate avoidance and/or mitigation measures. If impacts are proposed to occupied or suitable habitat or adjacent habitats, CDFW recommends that the DEIR include consultation with the USFWS at the earliest opportunity as take authorization may be required.

3. The IS identifies California Rare Plant Rank 1B.1 and FESA-threatened spreading navarretia as a potential concern. CNDDDB also documents the presence of California Rare Plant Rank 1B.1 Del Mar manzanita, and 2B.2 wart-stemmed ceanothus immediately adjacent to the south and southwest of the site. The DEIR should include a report of seasonally appropriate surveys in all areas with suitable habitat for sensitive plants, conducted within the last two years. If present, the DEIR should disclose potential impacts to the species as well as proposed avoidance and mitigation measures.
4. The preliminary biological analysis provided in the IS notes the potential for sensitive plants such as San Diego button-celery, spreading navarretia, and San Diego thornmint. The first two of these species are associated with vernal pools, and San Diego thornmint may be associated or located in the vicinity of vernal pools. Vernal pools are considered a rare resource, as it is estimated over 95% of vernal pools in California have been destroyed (USFWS 1998). CDFW considers the loss of these pool complexes to be regionally and biologically significant. To the extent practicable, vernal pools and depressions, and the entire sub-watershed that supports the hydrology of the pool/depression, should be avoided and conserved. The DEIR should identify any existing vernal pool habitat, analyze potential impacts, and propose avoidance and mitigation measures should vernal pools be identified on site.

Project Description and Alternatives

5. The NOP includes a brief discussion of the Project but does not provide sufficient detail to conduct a comprehensive analysis of the potential impacts. To facilitate meaningful review of the Project from the standpoint of the protection of plants, fish, and wildlife, CDFW recommends the following information be included in the DEIR:
 - a. the document should contain a complete discussion of the purpose and description of the Project, including all staging areas and access routes to the construction and staging areas; and,
 - b. the DIER should include a range of feasible alternatives to ensure that alternatives to the Project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources.

Biological Baseline Assessment

6. CDFW has responsibility for wetland and riparian habitats. CDFW strongly discourages development in wetlands or conversion of wetlands to uplands. CDFW opposes any development or conversion that would result in a reduction of wetland acreage or wetland

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habitat values, unless, at a minimum, project mitigation assures there will be “no net loss” of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to aquatic resources must be included in the DEIR.

- a. The central portion of the Project site includes an aquatic feature that may have a bed, bank, or channel. As a Responsible Agency under CEQA, CDFW has authority over a) activities in streams and/or lakes that will divert or obstruct the natural flow; b) changes in the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; and, c) use of material from a streambed. For any such activities, the Project Proponent must provide written notification to CDFW pursuant to Fish and Game Code section 1600 *et seq.*
 - b. CDFW’s issuance of a Lake or Streambed Alteration Agreement (LSAA) for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the Environmental Impact Report of the local jurisdiction (City) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA.
 - c. A preliminary delineation of the streams and associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW’s authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers’ section 404 permit and Regional Water Quality Control Board section 401 Certification.
 - d. In Project areas which may support ephemeral streams, herbaceous vegetation and woody vegetation also serve to protect the integrity of these resources and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated buffer areas adjoining ephemeral drainages. If these buffer areas are proposed for impact, they should be included in the sensitive habitat impact analysis.
 - e. Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR.
 - f. As part of the LSAA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
7. The NOP includes a brief discussion of the flora and fauna within the Project’s area of potential effect but does not provide a full assessment in sufficient detail to conduct a comprehensive analysis of the potential impacts. CDFW recommends the DEIR provide a complete

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assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete species compendium of the entire Project site, undertaken at the appropriate time of year. The DEIR should include the following information:

- a. CEQA Guidelines, section 15125(c), specifies that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed 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 from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3, and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
- b. a complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CNDDDB should be reviewed to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>;
- c. an inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and USFWS;
- d. 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 Natural Communities* (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>); floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *A Manual of California Vegetation*, second edition, should be used to inform this mapping and assessment. Alternately, for assessing vegetation communities located in western San Diego County, the *Vegetation Classification Manual for Western San Diego County* (Sproul et al. 2011) may be used; and,
- e. adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

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Biological Direct, Indirect, and Cumulative Impacts and Proposed Mitigation Measures

8. The NOP does not provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. To facilitate meaningful review of the Project's potential impacts on biological resources, the DEIR should include a detailed discussion of potential impacts as well as specific measures to offset such impacts.
 - a) Indirect Impacts: a discussion of potential adverse impacts from lighting, noise, exotic species, and human activity and proposed mitigation measures to alleviate such impacts.
 - i) Adjacent Resources: the DEIR should include a discussion regarding indirect Project impacts on biological resources, including 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 the proposed NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - ii) Landscaping: the Project includes landscaped areas. Habitat loss and invasive plants are a leading cause of native biodiversity loss. CDFW recommends that the DEIR also stipulate that no invasive plant material shall be used. Furthermore, CDFW recommend using native, locally appropriate plant species for landscaping on the Project site. A list of invasive/exotic plants that should be avoided as well as suggestions for suitable landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>.
 - iii) Pesticide: the Project may include outside pesticide use. Please be aware of a new California law, AB 1788, which bans the use of second-generation rodenticide.
 - b) Mitigation Measures: the DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. CDFW recommends that mitigation ratios should be consistent with the table *Mitigation Ratios for Impacts to Subarea Plan Species* on page 72 of the City's draft conservation plan. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance, and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the City must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
 - i) Long-term Management of Mitigation Lands: the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide

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for long-term management of mitigation lands.

- ii) Sensitive Bird Species: to avoid impacts to nesting birds, the DEIR should require that, when biologically warranted, construction (especially clearing and rough grading) would occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the Project area would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. CDFW generally recommends the buffer be a minimum width of 100 feet for general passerine birds, 300 feet from state or federal listed bird species, and 500 feet for raptor species. The buffer should be demarcated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No Project construction shall 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 the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
 - iii) Translocation: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
- c) Cumulative Effects: a cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to the DEIR impacts on similar wildlife habitats.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base 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 CNDDDB. The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

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.)

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Elyse Levy, Senior Environmental Scientist, at Elyse.Levy@wildlife.ca.gov.

Sincerely,

DocuSigned by:



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David A. Mayer
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