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May 3, 2024

Governor's Office of Planning & Research

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May 03 2024

STATE CLEARINGHOUSE

SUBJECT: BLUEPRINT SD INITIATIVE, HILLCREST FPA, AND UNIVERSITY CPU PROGRAM, DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH#2021070359; SAN DIEGO COUNTY, CA

Dear Elena Pascual:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) from the City of San Diego (City) for the Blueprint San Diego (SD) Initiative, Hillcrest Focused Plan Amendment (FPA), and University Community Plan Update (CPU) (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding the activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate 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, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subdivision (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 state fish and wildlife resources.

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 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, including 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” (see Fish & G. Code, § 2050) 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.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP by implementation of its approved Subarea Plan (SAP) and Implementation Agreement (IA) under the subregional Multiple Species Conservation Program (MSCP). The City’s Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation under the SAP.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego

Objective: In 2008, the City adopted a General Plan to provide policy guidance on long-term development based on several elements including land use and community planning, mobility, economic prosperity, public facilities, services and safety, urban design, recreation, historic preservation, conservation, noise, and housing. Currently, the City implements 48 different Community Plans that tier off from the General Plan’s Land Use and Community Planning Element and provide community-specific policies and land use designation maps.

The Project proposes to amend the General Plan through adoption of the Blueprint SD Initiative, which will update the City’s land use planning framework and policies to ensure projected development is consistent with the housing, climate, and mobility goals outlined in the City’s 2022 Climate Action Plan (CAP) and San Diego Association of Governments’ (SANDAG) 2021 Transportation Plan. Under Blueprint SD, future land use changes would be implemented through Community Plan Updates (CPU), Specific Plans, and Focused Plan Amendments (FPA), with the goal of focusing development of mixed-use “Climate Smart Village” areas near transit and recreational areas to support community sustainability, mobility, and quality of life.

The Project also proposes immediate updates to the University CPU and Hillcrest FPA within the Uptown Community Plan that incorporate amendments to the City’s Land Development Code (LDC) and zoning designations. The Project may include future MSCP Boundary Line Corrections (BLCs) to address MSCP mapping errors (e.g.

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removing pre-SAP development). The Project may also include Boundary Line Adjustments (BLAs) to remove the MHPA designation over lands to allow additional development encroachment (more than 25 percent of the parcel) in certain areas in exchange for additional conservation areas added elsewhere contingent on the exchange yielding an equal or greater biological value. The Project specifically proposes a BLC within the University CPU to add 25.97 acres of City-owned land into the MHPA (25 percent developable, 75 percent conserved) in areas along Nobel Drive and Sorrento Valley Road. In addition, the City will also vacate 2.70 acres of City-owned right-of-way traversing Rose Canyon that will change from 75 percent conserved designation to 100 percent conserved MHPA. The DPEIR Mitigation Measure (MM) BIO-1 stipulates that “any future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City’s Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City’s [SAP] and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City’s ESL Regulations, Biology Guidelines, and [SAP] and VPHCP” (DPEIR page 4.3-64).

Location: The City of San Diego covers approximately 372 square miles in the southwest corner of California. It is bound to the west by the Pacific Ocean, and to the east and south by the cities of Santee, La Mesa, and Lemon Grove, unincorporated County of San Diego lands, and National City. The Project area is bound to the north by the cities of Del Mar, Solana Beach, Escondido, and Poway, and unincorporated County of San Diego lands.

University City encompasses approximately 8,676 acres in the north-central area of the City, classified as the ‘Northern Area’ and ‘Urban Area’ in the SAP. It is bound to the south by State Route 52 and is crisscrossed by Interstate 5 and Interstate 805. It is bound to the east by the community of Mira Mesa and Marine Corps Air Station Miramar and to the west by the Pacific Ocean and the community of La Jolla. This area currently supports a mix of educational, commercial, and industrial facilities, residential development, urban parks, and open space/MHPA lands including portions of Rose Canyon, Torrey Canyon, Carroll Canyon, Sorrento Canyon, and Miramar Canyon.

The Hillcrest FPA is nested within the Uptown community and is located just north of downtown San Diego and covers approximately 380 acres. It is bound to the north by Interstate 8, east by Park Boulevard and Balboa Park, and to the west and south by Old Town San Diego and Interstate 5.

Biological Setting: Per the DPEIR, thirty-one vegetation communities and land cover types are present throughout the City (DPEIR; Table 4.3-1; Attachment A). Vegetation communities and land cover types were classified following Holland (1986) as modified by Oberbauer et al. (Oberbauer et al. 2008). Per the DPEIR, there are 12 special status plant species known to occur within the Project area, with seven species reported within the City’s proposed Climate Smart Village Areas (DPEIR; Table 4.3-2; Attachment B). In

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addition, there are 12 special status wildlife species known to occur within the Project area, with 11 of those species reported within the City's proposed Climate Smart Village Areas (DPEIR; Table 4.3-3; Attachment C). Four of the wildlife species are sensitive nesting birds including California least tern (*Sternula anatillarum browni*; CESA and Endangered Species Act (ESA)-listed endangered, California Fully Protected Species), coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, California Species of Special Concern (SSC)), least Bell's vireo (*Vireo bellii pusillus*; CESA-listed endangered, ESA-listed endangered; vireo), and American peregrine falcon (*Falco peregrinus anatum*). One species, Crotch's bumble bee (*Bombus crotchii*), was left off the list in the DPEIR of species that have occurred or are likely occur within the City limits. Crotch's bumble bee is currently a candidate for listing under CESA; therefore, future projects under the DPEIR will need to address all potential impacts to the species (CDFW 2024a).

Project History: CDFW previously provided comments on the Notice of Preparation for the Blueprint SD Initiative component of the Project in a letter dated August 18, 2021.

COMMENTS AND RECOMMENDATIONS

The DPEIR 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 construction of each project is needed. 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 conservation objectives in the City's SAP and VPHCP would not be eliminated by implementation of the Project. Furthermore, CDFW recommends the City provide Biological Resources Mitigation Measures for the Project and condition the environmental document to include the mitigation measures recommended in this letter. CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (Attachment D).

COMMENT #1: Proposed Amendments to Land Development Code (LDC)

Issue: Section 3.5.1.3 of the DPEIR states that "future LDC amendments may include, but not be limited to, the following: amendments to facilitate ministerial processing of residential and mixed-use development...and changes to support development and mobility improvements" (DPEIR page 3-26). CDFW and City staff (Dan Monroe, Senior Planner) discussed this item briefly in the field on April 23, 2024, and the City relayed that these amendments will likely involve rezoning of

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land use designations and that an amended LDC document has not yet been prepared or included in the DPEIR.

Specific Impact: Proposed amendments to the City's LDC may result in changes to the City's standards for determination of impact and mitigation under CEQA and implementation of their SAP.

Why impact would occur: There is insufficient detail provided in the DPEIR for CDFW to determine if proposed amendments to the LDC will be consistent with the conservation measures provided in the SAP, IA, and NCCP Permit (CDFW 1997).

Evidence that impact would be significant: The City has an approved and permitted NCCP that they implement in partnership with CDFW. As the permitting entity, CDFW has a compelling interest in reviewing any changes to the City's implementation framework such as the LDC. Any amendments to the LDC inconsistent with the SAP may result in noncompliance with the NCCP Permit.

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #1 CDFW Review of Future Amendments to the LDC: All proposed amendments to the LDC shall be consistent with the City's SAP, IA, and NCCP Permit. CDFW would appreciate the opportunity to review and comment on any proposed amendments to the LDC to ensure consistency with the SAP.

COMMENT #2: Impacts to Crotch's Bumble Bee

Issue: Future projects associated with the DPEIR may impact suitable habitat for Crotch's bumble bee (*Bombus crotchii*), a candidate species for CESA listing that is not covered under the SAP. The DPEIR or the Biological Technical Report does not discuss or provide mitigation measures to reduce the Project's impacts to Crotch's bumble bee.

Specific impact: Future projects may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: According to the [California Natural Diversity Database](#), observations of Crotch's bumble bee have been recorded within the City (CDFW 2024b). Additionally, [iNaturalist](#) has recent recorded observations of Crotch's bumble bee within the City (iNaturalist 2024). As with any flying species, Crotch's bumble bee may utilize areas that have suitable nesting habitat and floral resources

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throughout the City. The BTR identifies vegetation throughout the Project site that has the potential to provide suitable nesting, overwintering, and foraging habitat for this species. Crotch's bumble bee primarily nest underground in late February through late October in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Foraging habitat for Crotch's bumble bee includes both native and non-native floral resources in a variety of vegetation types within approximately 0.5 km of a nest. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. The BTR and DPEIR does not discuss the Project's impact on Crotch's bumble bee. Furthermore, the DPEIR does not provide specific avoidance and minimization measures directly related to Crotch's bumble bee. Without sufficient species-specific avoidance, minimization, or mitigation measures impacts to Crotch's bumble bee may occur.

Evidence impact would be significant: Impacts to CESA-listed species and their habitat meet the definition of endangered, rare, or threatened under CEQA (CEQA Guidelines § 15380). Impacts to CESA listed species and their habitats may result in a mandatory finding of significance because the Project has the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines § 15065).

The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA (Fish & G. Code, § 2050 et seq.), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Lastly, Crotch's bumble bee is listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: Crotch's Bumble Bee Surveys - Within one year prior to vegetation removal and/or grading, a qualified entomologist with appropriate handling permits and who is familiar with the species behavior and life history, shall

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conduct focused surveys to determine the presence/absence of Crotch's bumble bee within and adjacent to a proposed project site. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species](#) (CDFW 2023) or the latest guidance from CDFW. Focused surveys shall also be conducted throughout the entire project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing project-related ground-disturbing activities. At minimum, a survey report shall provide the following:

- 1) a description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee;
- 2) field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched;
- 3) map(s) showing the location of observations and any nests/colonies; and
- 4) a description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

Mitigation Measure #2: Avoidance Plan - If Crotch's bumble bee is detected, the applicant in consultation with a qualified entomologist shall develop a plan to fully avoid impacts to Crotch's bumble bee, if feasible. The plan shall include effective, specific, and enforceable measures. An avoidance plan shall be submitted to the CDFW and City for approval prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.

Mitigation Measure #3: Incidental Take Permit - If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided, the Project applicant shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq.). The Project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project applicant shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

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Additional Comments

1. Trails Proposed within Multi-Habitat Planning Area (MHPA) Lands. The DPEIR depicts several proposed trails within and adjacent to MHPA lands (DPEIR Figures 3-15 and 3-26).

Recommendation #2 Proposed Trails: Although CDFW acknowledges that trails are allowed within and adjacent to the MHPA lands consistent with Section 1.5.2 of the City's SAP, we strongly recommend that proposed trails are not pre-emptively depicted in the DPEIR given the programmatic nature of the document. Prior to implementation of any trail projects, CDFW would appreciate the opportunity to evaluate site-specific species and habitat information to analyze biological impacts and determine if the proposed trails and consequent recreational activity are consistent with the MSCP.

To facilitate our review of proposed trails, CDFW recommends that the following information be provided as subsequent trail projects move forward: an aerial photograph with an overlay of the proposed alignment of the trail in relation to any designated or proposed open space, specifications of trail design, measures to avoid/minimize impacts related to users straying off-trail or trail use by unauthorized vehicles such as electric bicycles, responsibility entity and activities related to maintenance, and a discussion of how the proposed location and use of the trail would be consistent with the SAP.

2. Multi-Habitat Planning Area (MHPA) Boundary Line Adjustments (BLA). CDFW recommends that the City consult with the Wildlife Agencies early on to review any future proposed BLA under the Project.

Recommendation #3 Wildlife Agencies' Concurrence on Boundary Line Adjustments: To ensure consistency with the MSCP's conservation goals and objectives, future projects under the DPEIR should provide full disclosure and functional equivalency analysis of any proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals:

- No net loss of MHPA acreage;
- No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb);
- Net impacts/conservation of covered listed species resulting from the BLA;
- Net impacts/conservation of covered non-listed sensitive species resulting from the BLA; and

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- Landscape configuration to maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design')
3. **Lake and Streambed:** Future projects may impact local lakes, rivers, or streams within the City of San Diego. CDFW has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency.

Recommendation #4 Fish and Game Code 1600 Notification: To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DPEIR 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. CDFW recommends the Applicant submit a Lake and Streambed Alteration Notification to CDFW. Notifications can be submitted through CDFW's Environmental Permit Information Management System (EPIMS), which can be found at [Environmental Permit Information Management System \(ca.gov\)](https://www.cdffw.gov/Environmental-Permit-Information-Management-System) (CDFW 2024c).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data> (CDFW 2024d). 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: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals> (CDFW2024e).

ENVIRONMENTAL DOCUMENT 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

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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 of San Diego in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the Lead Agency 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, Environmental Scientist, at Alison.Kalinowski@wildlife.ca.gov or (858) 775-6320.

Sincerely,

DocuSigned by:

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Attachments:

Attachment A. Vegetation Communities and Land Cover Types

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Table 4.3-1 Vegetation Communities and Land Cover Types			
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
Upland Vegetation Communities			
Diegan Coastal Sage Scrub	454	4	596
Non-Native Grassland	<1	0	111
Chaparral/ Southern Mixed Chaparral	255	4	354
Chamise Chaparral	0	0	45
Maritime Succulent Scrub	0	0	446
Scrub Oak Chaparral	0	0	7
Southern Coastal Bluff Scrub	0	0	98
Southern Maritime Chaparral	0	0	255
Torrey Pines Forest	0	0	105
Valley and Foothill Grassland/ Valley Needlegrass Grassland	143	1	509
Total Uplands	853	9	2,527
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
Wetland Vegetation Communities			
Disturbed Wetland	8	0	3
Southern Coastal Salt Marsh	12	0	13
Coastal and Valley Freshwater Marsh	24	0	<1
Freshwater Seep	0	0	1
Southern Riparian Forest	2	0	18
Southern Coast Live Oak Riparian Forest	0	0	7
Southern Cottonwood-Willow Riparian Forest	78	0	0
Southern Sycamore-Alder Riparian Woodland	12	0	89
Southern Riparian Scrub	66	0	57
Southern Willow Scrub	0	0	<1
Subtidal	6	0	4
Shallow Bay	7	0	0
Estuarine	6	0	0
Freshwater	80	0	0
Vernal Pools	0	0	1 ¹
Non-Vegetated Channel or Floodway	3	0	1
Beach	28	0	44
Total Wetlands	331	0	236
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
Disturbed/Developed Land Cover Types			
Disturbed Land	456	6	367
Urban/Developed	23,239	366	5,451
Agriculture	16	0	0
Eucalyptus Woodland	15	<1	95
Total Disturbed/ Developed Land Cover Type	23,726	380	5,913
Notes:			
Acreages are approximate based on generalized data and may not add due to rounding. Focused surveys would be required to verify resources.			
¹ Vernal pool acreages are estimates. Locations of vernal pool resources within the University CPU area are depicted in more detail on Figures 7a and 7b of Appendix D.			

Attachment B. Sensitive Plant Species Within Project Area

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Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas ¹				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diego button-celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Biennial/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April–June; elevation less than 2,000 feet. Known from San Diego and Riverside counties. Additional populations occur in Baja California, Mexico.	Present. Known from 49 locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
California Orcutt grass (<i>Orcuttia californica</i>)	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms April–August; elevation 50–2,200 feet.	Potential. No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Salt marsh bird's beak (<i>Chloropyron maritimum</i> ssp. <i>Maritimum</i> [= <i>Cordylanthus maritimus</i> ssp. <i>Maritimus</i>])	FE SE CRPR 1B.2 City of San Diego MSCP	Annual herb (hemiparasitic); coastal dunes, coastal salt marshes and swamps; blooms May–October; elevation less than 100 feet.	Present. Known from 5 locations in La Jolla (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Spreading navarretia (<i>Navarretia fossalis</i>)	FT CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.	Potential. No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Thread-leaved brodiaea (<i>Brodiaea filifolia</i>)	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Perennial herb (bulbiferous); cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools; often clay soils; blooms March–June; elevation less than 2,850–3,675 feet. California endemic. Known from San Diego, Riverside, Orange, Los Angeles, and San Bernardino counties.	Potential. No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.

Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas ¹				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Orcutt's spineflower (<i>Chorizanthe orcuttiana</i>)	FE SE CRPR 1B.1	Annual herb; maritime chaparral, closed-cone coniferous forest, coastal sage scrub; sandy openings; blooms March–May; elevation less than 400 feet. San Diego County endemic. Known from fewer than 20 occurrences.	Present. Known from 20 locations in La Jolla and Point Loma (CDFW 2024).	Potential. Although no historical records occur (CDFW 2024), this species has potential to occur within suitable coastal sage scrub habitat along the canyon in the northern corner of the Hillcrest FPA Area.
Willow monardella (<i>Monardella viminea</i> [= <i>Monardella linoides</i>])	FE SE CNPS 1B.1 City of San Diego MSCP	Perennial herb; closed-cone coniferous forest, chaparral, coastal sage scrub, riparian scrub, riparian woodlands, sandy seasonal dry washes; blooms June–August; elevation 160–740 feet. San Diego County endemic.	Present. Known from 66 locations throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms March–July; elevation 300–700 feet. San Diego County endemic.	Present. Known from 208 locations throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Otay mesa mint (<i>Pogogyne nudiuscula</i>)	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms May–July; elevation 300–820 feet. In California, known from approximately 10 occurrences in Otay Mesa in San Diego County. Additional populations occur in Baja California, Mexico.	Present. Known from 77 locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego thornmint (<i>Acanthomintha ilicifolia</i>)	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	Present. Known from 60 locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. One historical record occurs from 1936 (CDFW 2024); however, this species is possibly extirpated.
Del Mar manzanita (<i>Arctostaphylos glandulosa</i> ssp. <i>Crassifolia</i>)	FE CRPR 1B.1 City of San Diego MSCP	Perennial evergreen shrub; southern maritime chaparral; sandy soil; blooms December–June; elevation less than 1,200 feet.	Potential. No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.

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Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas ¹				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Variegated dudleya (<i>Dudleya variegata</i>)	CRPR 1B.2 City of San Diego NE, MSCP	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms April-June; elevation less than 1,900 feet.	Present. Known from 106 locations throughout the Climate Smart Village Areas (CDFW 2024).	Potential. One historical record occurs from 1936 (CDFW 2024) and this species has potential to occur in openings in coastal sage scrub and chaparral along the canyons in the northwestern corner of the Hillcrest FPA Area.

¹ Refer to Appendix D for detail on the sensitive plant species that occur or have a potential to occur within the University CPU area.

SOURCES: Jepson Flora Project 2022; CDFW 2024; Calflora 2023; NatureServe 2023

STATUS CODES

Federal Status
 FE = Listed as endangered by the federal government
 FT = Listed as threatened by the federal government

State Status
 SE = Listed as endangered by the state of California

California Native Plant Society (CNPS): California Rare Plant Ranks (CRPR)
 1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
 0.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).
 0.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).

City of San Diego
 MSCP = City of San Diego MSCP Subarea Plan covered species.
 NE = Narrow Endemic species that have limited distributions in the region and require focused evaluations during project review.
 VPHCP = City of San Diego Vernal Pool Habitat Conservation Plan covered species.

Attachment C. Sensitive Wildlife Species Within Project Area

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Table 4.3-3 Sensitive Wildlife Species with a Potential to Occur within the Project Areas				
Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
<i>Invertebrates</i>				
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE	Open, dry areas in foothills, mesas, lake margins. Larval host plant <i>Plantago erecta</i> . Adult emergence mid-January through April.	Present. Known from 74 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Riverside fairy shrimp (<i>Streptocephalus woodtoni</i>)	FE City of San Diego VPHCP	Vernal pools.	Present. Known from 55 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	FE City of San Diego VPHCP	Vernal pools.	Present. Known from 783 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Amphibians</i>				
Western spadefoot (<i>Spea hammondi</i>)	FPT SSC	Vernal pools, floodplains, and alkali flats within areas of open vegetation.	Present. Known from 464 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. Although 1 historical record occurs for this species in 1946 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.
Arroyo toad (<i>Anaxyrus californicus</i> [= <i>Bufo microscaphus californicus</i>])	FE SSC City of San Diego MSCP	Open streamside sand/gravel flats. Quiet, shallow pools along stream edges are breeding habitat. Nocturnal except during breeding season (March–July).	Present. Known from 94 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Reptiles</i>				
Southwestern pond turtle (<i>Emys marmorata</i>)	SSC MSCP	Ponds, small lakes, marshes, slow-moving, sometimes brackish water.	Potential. Suitable ponds, small lakes and marshes with slow-moving water habitats are present throughout the Climate Smart Village Areas.	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.

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Table 4.3-3 Sensitive Wildlife Species with a Potential to Occur within the Project Areas				
Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diegan legless lizard (<i>Anniella stebbinsi</i> [= <i>Anniella pulchra</i>])	SSC	Herbaceous layers with loose soil in coastal scrub, chaparral, and open riparian. Prefers dunes and sandy washes near moist soil.	Present. Known from 385 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Potential. Known from 1 historical location in 1976 (CDFW 2024) and suitable coastal scrub and chaparral habitat occurs in the northwestern corner of the Hillcrest FPA Area.
California glossy snake (<i>Arizona elegans occidentalis</i>)	SSC	Scrub and grassland habitats, often with loose or sandy soils.	Present. Known from 184 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Potential. Known from 1 historical location in 1942 (CDFW 2024) and marginally suitable scrub habitat occurs in the northwestern corner of the Hillcrest FPA Area.
<i>Birds</i>				
American peregrine falcon (<i>Falco peregrinus anatum</i>)	City of San Diego MSCP	Open coastal areas, mud flats. Rare inland. Rare fall and winter resident, casual in late spring and early summer. Local breeding populations extirpated.	Present. Known from 278 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. Known from 1 historical location in 1990 (CDFW 2024); however, no suitable habitat is present.
California least tern (<i>Sternula</i> [= <i>Sterna</i>] <i>antillarum browni</i>)	FE SC, CFP City of San Diego MSCP	Bays, estuaries, lagoons, shoreline. Resident. Localized breeding.	Present. Known from 32 historical locations in Point Loma and La Jolla (CDFW 2024).	Not Expected. No historical records occur (CDFW 2024) and no suitable habitat is present.
Coastal California gnatcatcher (<i>Poliptila californica californica</i>)	FT SSC City of San Diego MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	Present. Known from 1,648 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Potential. No historical records occur (CDFW 2024); however, suitable Diegan coastal sage scrub is present along the northern site boundary.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE SE City of San Diego MSCP	Willow riparian woodlands. Summer resident.	Present. Known from 820 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	Not Expected. Although 1 historic record occurs from 1921 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.

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Attachment D. Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
Recommendation #1 CDFW Review of Future Amendments to the LDC	All proposed amendments to the LDC shall be consistent with the City’s SAP, IA, and NCCP Permit. CDFW would appreciate the opportunity to review and comment on any proposed amendments to the LDC to ensure consistency with the SAP.	Prior to City approval of amendments to the LDC	City
MM-BIO-1-Crotch’s Bumble Bee Surveys	Within one year prior to vegetation removal and/or grading, a qualified entomologist with appropriate handling permits and who is familiar with the species behavior and life history, shall conduct focused surveys to determine the presence/absence of Crotch’s bumble bee within and adjacent to a proposed project site. Focused surveys shall follow CDFW’s Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire project site during the appropriate flying season to ensure no missed detection of Crotch’s bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing project-related ground-disturbing activities. At minimum, a survey report shall provide the following:	Prior to vegetation removal and ground-disturbing activities	Project Applicant/Qualified Entomologist

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	<ol style="list-style-type: none"> 5) a description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch’s bumble bee; 6) field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched; 7) map(s) showing the location of observations and any nests/colonies; and, 8) a description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). 		
<p>MM-BIO-2-Avoidance Plan</p>	<p>If Crotch’s bumble bee is detected, the applicant in consultation with a qualified entomologist shall develop a plan to fully avoid impacts to Crotch’s bumble bee, if feasible. The plan shall include effective, specific, and enforceable measures. An avoidance plan shall be submitted to the CDFW and City for approval prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch’s bumble bee.</p>	<p>Prior to vegetation removal and ground-disturbing activities</p>	<p>Project Applicant/City</p>

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<p>MM-BIO-3- Incidental Take Permit</p>	<p>If Crotch’s bumble bee is detected and if impacts to Crotch’s bumble bee cannot be feasibly avoided, the Project applicant shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq.). The Project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project applicant shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.</p>	<p>Prior to issuance of grading permit and ground-disturbing activities</p>	<p>Project Applicant</p>
<p>Recommendation #2 Proposed Trails</p>	<p>Although CDFW acknowledges that trails are allowed within and adjacent to the MHPA lands consistent with Section 1.5.2 of the City’s SAP, we strongly recommend that proposed trails are not pre-emptively depicted in the DPEIR given the programmatic nature of the document. Prior to implementation of any trail projects, CDFW would appreciate the opportunity to evaluate site-specific species and habitat information to analyze biological impacts and determine if the proposed trails and consequent recreational activity are consistent with the MSCP.</p> <p>To facilitate our review of proposed trails, CDFW recommends that the following information be provided as subsequent trail projects move forward: an aerial photograph with an overlay of the proposed alignment of</p>	<p>Prior to issuance of project-level permits and prior to CEQA public review (if applicable)</p>	<p>Project Applicant/City</p>

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	<p>the trail in relation to any designated or proposed open space, specifications of trail design, measures to avoid/minimize impacts related to users straying off-trail or trail use by unauthorized vehicles such as electric bicycles, responsibility entity and activities related to maintenance, and a discussion of how the proposed location and use of the trail would be consistent with the SAP.</p>		
<p>Recommendation #3 Wildlife Agencies' Concurrence on Boundary Line Adjustments</p>	<p>To ensure consistency with the MSCP's conservation goals and objectives, future projects under the DPEIR should provide full disclosure and functional equivalency analysis of any proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals:</p> <ul style="list-style-type: none"> · No net loss of MHPA acreage; · No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb); · Net impacts/conservation of covered listed species resulting from the BLA; · Net impacts/conservation of covered non-listed sensitive species resulting from the BLA; and · Landscape configuration to maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design') 	<p>Prior to City approval of the BLA</p>	<p>City</p>

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Recommendation #4 Fish and Game Code 1600 Notification	To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DPEIR 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. CDFW recommends the Applicant submit a Lake and Streambed Alteration Notification to CDFW. Notifications can be submitted through CDFW's Environmental Permit Information Management System (EPIMS), which can be found at Environmental Permit Information Management System (ca.gov) (CDFW 2024c).	Prior to issuance of grading permit and ground-disturbing activities	Project Applicant
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