



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



June 10, 2024

Anne Collins-Doehne  
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The Board of Trustees of the California State University  
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**SUBJECT: FENTON PARKWAY BRIDGE PROJECT DRAFT ENVIRONMENTAL  
IMPACT REPORT SCH# 2023050534, SAN DIEGO COUNTY, CA**

Dear Anne Collins-Doehne:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from The Board of Trustees of California State University (CSU; Lead Agency) for the Fenton Parkway Bridge (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, 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, 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.

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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 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.*), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also oversees implementation of the Natural Community Conservation Planning (NCCP) program, a comprehensive habitat conservation planning program. 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. 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:** San Diego State University (SDSU)

**Objective:** The objective of the Project is to construct a 450-foot-long, 58-foot-wide bridge that spans the San Diego River. The bridge will connect the southern terminus of Fenton Parkway to the northern terminus of Mission City Parkway at the intersection of Camino Del Rio North. The bridge will be supported by concrete seat-type abutments in the river embankments at each end, and two to three piers within the river channel, each consisting of two to three approximately 20-foot-tall, 6-foot-diameter circular concrete columns. The existing storm drain infrastructure in the area will require relocation and/or extension to accommodate bridge construction.

**Location:** The Project site is located in and along the San Diego River in the City of San Diego, north of Interstate 8, between Interstates 805 and 15, and southwest of Snapdragon Stadium. The Project is within the City's MSCP planning area, within the Mission Valley Community Plan (MVCP) area and will traverse and be adjacent to the MHPA, as well as the City's SDSU Stadium Mitigation Site. The DEIR and Biological Resources Map (Figure 3.3-1, Attachment B) indicate that most of the Project footprint is within the MHPA boundary and the area within the San Diego River channel is mapped as 100% conserved MHPA (City of San Diego, 2024). The Project site is at the same location as the bridges previously proposed in a 2001 DEIR and 2019 PDEIR, within the City's MVCP area, for which the City was the Lead Agency.

**Biological Setting:** The San Diego River plays a significant role in wildlife breeding and wintering. In addition to the federally- and state-listed endangered least Bell's vireo (*Vireo bellii pusillus*; vireo), numerous other migratory avian species use the site,

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including yellow warbler (*Dendroica petechia brewsteri*), yellow-breasted chat (*Icteria virens auricollis*), and Cooper's hawk (*Accipiter cooperii*); all of which are State Species of Special Concern (SSC). Several subspecies of willow flycatcher migrate through the San Diego River watershed, and it is possible that the southwestern willow flycatcher (*Empidonax traillii extimus*; flycatcher) occurs on site as a short-term migrant species. Among species that potentially use the area as a stop-over or nesting area are common yellowthroat (*Geothlypis trichas*), red-winged blackbird (*Agelaius phoeniceus*), marsh wren (*Cistothorus palustris*), yellow-rumped warbler (*Dendroica coronata*), waterfowl such as mallards and grebes, and raptor species such as white-tailed kite (*Elanus leucurus*; State Fully Protected). There is suitable habitat in the southern portion of the site for coastal California gnatcatcher (*Polioptila californica californica*; federally threatened; SSC). Rare plants on the Project site include San Diego County viguiera (*Viguiera laciniata*; California Rare Plant Rank (CRPR) 4.3) and San Diego marsh-elder (*Iva hayesiana*; CRPR 2B.2). The site also provides year-round habitat for amphibian, reptile, and mammal species, serving as a local wildlife corridor allowing movement of resident animals within their home range and dispersal of individuals into riparian habitats beyond the area. There is suitable habitat on the Project site for western spadefoot (*Spea hammondi*, federally proposed threatened, SSC), as well as Crotch's bumble bee (*Bombus crotchii*, candidate CESA listing). The San Diego River corridor is within the City's MHPA.

Permanent impacts to vegetation communities include: 0.03 acre of Baccharis-dominated Diegan coastal sage scrub (Tier II), 0.03 acre of restored Diegan coastal sage scrub (Tier II), and 0.80 acre of southern cottonwood-willow riparian forest (City Riparian). Temporary vegetation impacts include: 2.03 acres of Diegan coastal sage scrub (Tier II), and 0.38 acre of southern cottonwood-willow riparian forest. Impacts to Jurisdictional Aquatic Resources are described in the below tables:

**Table 6. Temporary Impacts to Jurisdictional Aquatic Resources**

Habitat Types/Vegetation Communities	Temporary Impacts <sup>1</sup> (acres)
<b>USACE/RWQCB/CDFW/City of San Diego Jurisdictional</b>	
Non-wetland Waters/City Wetland	0.02
Wetland/City Wetland	0.32
<i>Subtotal</i>	0.34
<b>CDFW/City of San Diego Jurisdictional</b>	
Riparian Area/City Wetland	0.06
<b>Total*</b>	<b>0.40</b>

**Note:**

<sup>1</sup> City regulations do not differentiate between temporary and permanent wetland impacts. This impact would be mitigated as permanent and in accordance with City of San Diego Biology Guidelines' Table 2a for an EPP.

\* May not sum due to rounding.

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**Table 7. Permanent Impacts to Jurisdictional Aquatic Resources**

Jurisdictional Aquatic Resource	Permanent Impacts (acres)
<b>USACE/RWQCB/CDFW/City of San Diego Jurisdictional</b>	
Non-wetland Waters–Riparian Area/City Wetland	0.07
Wetland/City Wetland	0.50
<i>Subtotal</i>	<i>0.57</i>
<b>CDFW/City of San Diego Jurisdictional</b>	
Riparian Area/City Wetland	0.27
<b>Total*</b>	<b>0.83</b>

Note:

\* May not sum due to rounding.

Mitigation for wetland/riparian impacts is proposed at a 3:1 ratio, including 1:1 impact-to-creation ratio through either creation, or purchase of credits for creation, of jurisdictional habitat of similar function and values. An additional 2:1 enhancement-to-impact ratio is proposed to meet the overall 3:1 ratio. Impacts to unvegetated stream channel are proposed at 1:1 or 2:1 ratio, with a 1:1 impact-to-creation ratio and the remainder through preservation. Temporary and permanent impacts to Diegan coastal sage scrub are proposed at a 1.5:1 mitigation ratio, and temporary impacts will be restored with a restoration goal of exceeding 80% pre-project native cover.

The Project footprint is excluded from the City’s stadium mitigation site credit area, and no direct impacts to the mitigation site would result from Project implementation.

**Project History:** CDFW previously submitted comments in response to: the DEIR for the City’s Mission City Parkway Bridge and Associated Facilities Project (joint comment with the U.S. Fish and Wildlife Service; USFWS; collectively, the Wildlife Agencies; USFWS/CDFW, 2001), the NOP for the Mission Valley Community Plan Update (CDFW, 2019), the Draft Programmatic EIR (DPEIR) for the Mission Valley Community Plan Update (USFWS/CDFW, 2019), and the Notice of Preparation of the DEIR for the Fenton Parkway Bridge Project (USFWS/CDFW, 2023). On January 4, 2024, the City of San Diego issued a letter to the Wildlife Agencies, declaring the bridge a City of San Diego Essential Public Project (EPP; City’s EPP letter).

SDSU, an entity of CSU, entered into a Memorandum of Understanding (MOU) with the City in August 2020 as part of the purchase and sale agreement between SDSU and the City, for the SDSU Mission Valley site. As described by the MOU, as well as City Ordinance No. O-21564, SDSU will design, plan, and construct the bridge to City Standards. SDSU and the City will share the cost of the project, and the City will assume operation and maintenance obligations upon completion. The DEIR indicates that the City will serve as a Responsible Agency under CEQA, and SDSU is responsible for securing all environmental permits required from State and Federal agencies.

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## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist CSU in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### COMMENT #1: Crotch's Bumble Bee

**Issue:** The Project will impact suitable nesting and foraging habitat for Crotch's bumble bee, a candidate species for CESA listing. The proposed mitigation measures in the DEIR are insufficient to reduce impacts to Crotch's bumble bee to a less than significant level.

**Specific impact:** The Project will result in both temporary impacts and permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee. Ground disturbing activities such as grading, trenching, and drilling could result in direct impacts, including death or injury of individual bees, collapse of burrows, nest abandonment, and reduced nest success. Direct and indirect impacts may occur from temporary disturbance of vegetation in staging areas.

**Why impact would occur:** According to the DEIR, suitable habitat for Crotch's bumble bee exists on the Project site, primarily in areas of coastal sage scrub habitat. The Project will permanently impact 0.07 acre and temporarily impact 2.03 acres of coastal sage scrub communities. The DEIR proposes Mitigation Measure BIO-5 (MM-BIO-5), which indicates that a pre-construction survey will be conducted to detect Crotch's bumble bee nests, if ground disturbing activities occur outside of the overwintering season. If a nest is detected, the biologist will flag a no-disturbance buffer to avoid take. The DEIR indicates that an Incidental Take Permit (ITP) and associated mitigation will only be pursued if impacts to the nest cannot be avoided. Proposed compensatory mitigation measures associated with a potential ITP include off site conservation, or purchase of credits at a CDFW-approved mitigation bank. At the present time, there are not any conservation banks in San Diego with species-specific credits for Crotch's bumble bee.

MM-BIO-5 does not discuss avoidance measures, should foraging individuals be detected. Additionally, compensatory mitigation is proposed if an ITP is pursued for nest impacts, but there is no mitigation proposed for loss of foraging habitat. If foraging individuals are present, vegetation removal may result in take, unless sufficient avoidance measures are incorporated. Removal of foraging habitat without compensatory mitigation may also contribute to a cumulative decrease of foraging habitat for this species.

**Evidence impact may be significant:** The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA,

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determining on September 30, 2022, that the listing “may be warranted” and advancing the species to the candidacy stage of the CESA-listing process. Pursuant to Fish and Game Code section 2085, CESA candidate species enjoy the same protections as CESA-listed threatened and endangered species. Therefore, take of Crotch’s bumble bee is prohibited, except as authorized by State law through the issuance of an ITP or other authorization (Fish & G. Code, §§ 2080, 2085).

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

CDFW recommends that a qualified entomologist familiar with the species’ behavior and life history conduct surveys within one year prior to vegetation removal and/or ground disturbance to determine the presence/absence of Crotch’s bumble bee. Surveys should focus on both nesting and foraging habitat. CDFW has published a Survey Considerations document for CESA Candidate Bumble Bees, which can be found at the following link: <https://wildlife.ca.gov/Conservation/CESA>. This document describes factors such as evaluating potential for presence, habitat assessment, and survey methods.

CDFW recommends that MM-BIO-5 be revised to include surveys for foraging Crotch’s bumble bees, in addition to nest surveys, and that compensatory mitigation be incorporated to account for loss of foraging habitat if the species is identified. CDFW recommends the following revisions to MM-BIO-5, indicated in ~~strikeout~~ and **bold**:

#### **Mitigation Measure #1: Crotch’s Bumble Bee Mitigation**

“MM-BIO-5 Pre-Construction Survey for Crotch’s Bumble Bee and Take Avoidance.

If ground-disturbing activities occur outside of the overwintering season, a pre-construction surveys for Crotch’s bumble bee (*Bombus crotchii*) shall occur within the construction area between February and October prior to the start of construction activities. **Surveys shall be conducted by a qualified entomologist familiar with the species’ behavior and life history.** Crotch’s bumble bee is a habitat generalist, ground-nesting bee. Surveys and other relevant recommendations will be in accordance with the most recent protocol available at the time of the surveys. The survey shall focus on detecting nests for Crotch’s bumble bee within the construction area, **as well as foraging individuals.** If active nests of Crotch’s bumble bee are present, an appropriate no disturbance buffer zone should be established around the nest to reduce the risk of disturbance or accidental take. **If a nest is detected or if foraging individuals are observed, the Project biologist will consult with CDFW to confirm that any proposed site-specific avoidance measures are sufficient to avoid take.**

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If active nests cannot be avoided **or take of foraging individuals is anticipated**, an Incidental Take Permit may be needed and mitigation for direct impacts to Crotch's bumble bee will be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process. **If foraging individuals are detected and an Incidental Take Permit will not be pursued, compensatory mitigation for loss of foraging habitat will be provided at a 1:1 replacement ratio.**

Mitigation will be accomplished either through off site conservation; or through a California Department of Fish and Wildlife (CDFW) approved mitigation bank, if a mitigation bank with species-specific credits for Crotch's bumble bee exists at the time of Project implementation. If mitigation is not purchased through a mitigation bank and lands are conserved separately, a cost estimate will be prepared to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of a maintenance fund to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record will take into account all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development.

Documentation/Reporting: The biologist shall submit a report to the City of San Diego and Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) documenting the methods and results of the surveys prior to clearing/grubbing activities.

Timing: Surveys will be completed between February and October prior to the start of construction activities."

## **COMMENT #2: Least Bell's Vireo**

**Issue:** It is unclear from the DEIR if the Project proponent will obtain a CESA ITP for least Bell's vireo (vireo).

**Specific impact:** Several sections of the DEIR indicate that a CESA ITP will be obtained for vireo, while other sections only reference federal take permits through USFWS. The avoidance and mitigation measures for vireo also incorporate language and measures specific to USFWS, but do not include CDFW.

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The Requested Project Approvals section (DEIR, Section 2.6.2, Item 13) states that a Biological Opinion and Incidental Take Statement will be required for vireo under Section 7 of the Endangered Species Act (consultation with the USFWS) but does not identify CESA permitting for the species. The DEIR proposes Mitigation Measure BIO-1 (MM-BIO-1) to address potential take of listed species, including vireo, flycatcher, and coastal California gnatcatcher. Vireo have been observed on site, and the riparian areas, for the purposes of CESA, are considered occupied. MM-BIO-1 indicates, “[t]ake authorization may be obtained through the federal Section 7 Consultation or Section 10 and state 2081 incidental take permit requirements.” The documentation section of MM-BIO-1 states that, “[a] Biological Opinion and Incidental Take Permit shall be issued by USFWS and California Department of Fish and Wildlife prior to clearing and grubbing of habitat within the San Diego River,” and that “...the USFWS-approved biologist will be on site during the activities specified in condition 4 above.”

**Why impact would occur:** The Project will result in 0.80 acre of permanent impacts and 0.38 acre of temporary impacts to southern cottonwood-willow riparian forest and unvegetated channel (0.03 acre permanent, and 0.02 acres temporary), which have the potential to support vireo nesting and foraging. The DEIR considers the temporary impacts to riparian habitat as permanent for the purposes of calculating the mitigation ratio, as the restored habitat under the bridge may not have equal function and value to the habitat currently present. The DEIR indicates that the impacts to vireo will consist of loss of habitat. Other potential impacts to vireo may include disturbance from noise and night lighting, which could lead to nest abandonment, even with incorporated avoidance measures and compensatory mitigation in MM-BIO-1.

**Evidence impact would be significant:** Consistent with CEQA Guidelines, Section 15380, the status of the least Bell’s vireo as an endangered species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 *et seq.*) and the California Endangered Species Act (Fish & G. Code, § 2050 *et seq.*) qualifies it as an endangered, rare, or threatened species under CEQA. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met.

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

**Recommendation #1: Least Bell’s Vireo:** Given the Project may result in take of least Bell’s vireo (Fish and Game Code, § 86), or lead to potential nest abandonment, CDFW recommends that the Final EIR specify that a CESA ITP will be obtained for take of vireo, and that the document be updated to consistently reflect this throughout each applicable section (i.e. Requested Project Approvals section, MM-BIO-1, and Executive Summary). Authorization from CDFW may



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include an ITP or a consistency determination (CD)(Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Requirements to meet the CESA 'fully mitigated standard' may differ from federal requirements, so early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. The fourth sentence of Mitigation Measure BIO-1 (MM BIO-1) should be updated to read: "Take authorization ~~may~~ **shall** be obtained through the federal Section 7 Consultation or Section 10 and state 2081 incidental take permit requirements." Additionally, the 'monitoring' section of MM BIO-1 shall be updated to read: "The USFWS- **and CDFW**-approved project biologist will be on site during the activities specified in condition 4 above."

### **COMMENT #3: Temporal Loss of Wetland Habitat**

**Issue:** The DEIR does not analyze temporal loss of riparian habitat.

**Specific impact:** The DEIR indicates that the Project will mitigate for impacts to wetland and riparian resources with ratios consistent with the City's SAP and Biology Guidelines. Mitigation for permanent and temporary wetland/riparian impacts is proposed at a 3:1 ratio, including 1:1 impact-to-creation ratio through either creation, or purchase of credits for creation, of jurisdictional habitat of similar function and value. An additional 2:1 enhancement-to-impact ratio is proposed to meet the overall 3:1 ratio. Mitigation is proposed for temporary impacts from construction staging, as well as permanent impacts from vegetation removal; however, temporal loss of habitat is not analyzed.

**Why impact would occur:** The Project will result in 0.80 acre of permanent impacts and 0.38 acre of temporary impacts to southern cottonwood-willow riparian forest, as well as 0.03 acre of permanent and 0.02 acre of temporary impacts to unvegetated channel in the San Diego River. Although the DEIR proposes mitigation for permanent and temporary impacts to riparian resources consistent with Table 2a of the City's Biology Guidelines, it does not factor in temporal loss of the mature southern cottonwood-willow riparian forest. Vireo breeding habitat consists of dense, shrubby vegetation characteristic of early successional stage, usually near river channels or other water (Kus et. al, 2022). While least Bell's vireo typically nest within dense riparian scrub vegetation, both adults and juvenile birds use adjacent mature riparian forest for foraging. It will take several years for the proposed wetland mitigation vegetation to reach the maturity and structure of the lost habitat. The temporal loss of mature riparian habitat will be significant for vireo and other avian species. Additionally, Mitigation Measure BIO-17 indicates that temporary impacts will be restored, with the goal of reaching above 80% of pre-project native cover within 3 years. This still allows for a loss of up to 20% native cover for vegetation that will be temporarily impacted. Furthermore, vegetation clearing creates habitat fragmentation and edge effects, which allow easier

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colonization by non-native plant species such as *Arundo donax* and *tamarix sp.*, and potentially increases opportunities for vireo nest predation.

**Evidence impact would be significant:** Southern cottonwood-willow riparian habitat supports a variety of avian species, including vireo. As indicated in the prior comment, least Bell's vireo is listed as an endangered species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 *et seq.*) as well as the California Endangered Species Act (Fish & G. Code, § 2050 *et seq.*). CDFW also exercises its regulatory authority as provided by Fish and Game Code section 1600 *et seq.* to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

1. Divert or obstruct the natural flow of any river, stream, or lake;
2. Change the bed, channel, or bank of any river, stream, or lake;
3. Use material from any river, stream, or lake; or,
4. Deposit or dispose of material into any river, stream, or lake.

As proposed, the Project will affect the San Diego River and associated riparian habitat, and will require a Lake and Streambed Alteration (LSA) Notification.

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

Impacts to special-status species from temporal loss of habitat can occur, especially in constrained areas of the San Diego River. CDFW recommends that CSU consider a higher mitigation ratio for impacts to riparian resources. While we recognize that CSU is proposing mitigation in accordance with Table 2a of the City's Biology Guidelines, a higher mitigation ratio may be appropriate, given the high-quality value of the habitat, the constrained nature of the San Diego River, and in consideration of temporal loss of riparian resources. To mitigate for impacts to southern cottonwood-willow riparian forest, CDFW recommends incorporating at least a 4:1 mitigation ratio, potentially higher, as agreed upon in consultation with CDFW at the time of the LSA Notification.

### **Mitigation Measure #2: Southern Cottonwood-Willow Riparian Mitigation**

MM-BIO-2 and MM-BIO-18 shall be updated to reflect that temporary and permanent impacts to southern cottonwood-willow riparian forest will be mitigated at a 4:1 ratio, at a minimum.

### **Additional Comments**

1. Project Location and Need: CDFW is concerned about CSU's reliance on the City's designation of the Project as an EPP, as it appears that the gain in public services is

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minimal relative to the magnitude of biological impacts which are anticipated from Project implementation. Although the DEIR relies on the City's designation of the Project as an EPP, we have several concerns regarding the EPP designation as currently justified by the City. These concerns are as follows:

- a. **Vehicle Miles Traveled (VMT):** The City's EPP letter designating the Project as an EPP discusses current out-of-direction travel and inefficient routing, resulting in increased greenhouse gas emissions. The City indicates that the Project will reduce greenhouse gas emissions and take steps towards meeting its Climate Action Planning Goals by reducing out-of-direction travel. Tables 1 and 2 in the Transportation Study (DEIR, Appendix H) forecast change in VMTs in the year 2027 and projected out to 2050. Projections are based on San Diego Association of Governments (SANDAG) modeling. For both the 2027 and the 2050 projections, implementation of the Project will result in a 0.09% decrease of VMTs within a 3-mile radius, and 0.05% reduction in VMTs within a 5-mile radius. Given that this analysis projects a less than 1% decrease in VMTs after Project implementation, the magnitude of the Project and biological impacts do not seem commensurate with the resulting reduction of VMTs.
- b. **Emergency Services:** The City's EPP letter cites the necessity of the Project to improve response time for fire-rescue services. Referring to the "5 Minute Engine Travel Congested and Uncongested" map from the Citygate Report (Citygate Associates, 2017), the City notes an apparent gap in service near the Riverwalk Golf Course and parts of the south side and east side of Mission Valley. However, the letter does not provide a traffic analysis to analyze how emergency response times would be improved by construction of a new bridge. Currently, there is an existing fire station less than one mile from the Fenton Parkway terminus on the north side of the San Diego River, which services Mission Valley north of the river. Additionally, there are several fire stations nearer to the areas that the City states have gaps in service than the Project area; it is not evident from the City's EPP letter that construction of the Project would result in faster response times from fire stations that are farther from those areas. The City's EPP letter also indicates that the bridge would improve access for emergency transport to UCSD Hillcrest Medical Center for current and future residents of Mission Valley East, but does not provide any traffic studies to substantiate that claim. Additionally, Kaiser Permanente Zion Medical Center is located approximately 2.5 miles from the Fenton Parkway terminus of the Project, which would remain a closer emergency facility, even after construction of the Project. Therefore, given these alternatives in emergency service transport locations, it is unclear how the Project would improve emergency response time.
- c. **Trolley Access:** The City's EPP letter indicates in the conclusion that, "the connection will make it possible for many Mission Valley and Mid-City residents to access the Green line trolley and SDSU Mission Valley using alternative

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modes,” but does not discuss existing conditions. On the north side of the San Diego River, there are multiple existing trolley stations that service Mission Valley residents, including a trolley station at Fenton Parkway. West of Interstate 805, residents can access the trolley at Rio Vista Station, by walking or biking across Qualcomm Way, less than 1 mile from the Project site. The trolley also crosses the river in several areas, providing access at the Mission Valley Center Station on the south side of the river, in the case that roads are not crossable during flood events, and also servicing Mid-City residents. Existing access to the Mission Valley area for Mid-City residents is constrained to one of the major freeways, or Fairmount Avenue, due to the hillside terrain acting as a geographic barrier. Residents of those areas have access to the Grantville Trolley station off of Fairmount Avenue, which would remain the closest trolley option from that access point, even if a bridge were to be constructed for access to the Fenton station. To the east, Mission San Diego Station is accessible by crossing Ward Road, 1.3 miles from the Project site (San Diego MTS). While a bridge at Fenton Parkway may improve convenience of access to the Fenton Trolley stop and SDSU Mission Valley Campus, there are no studies provided in the DEIR to demonstrate that there are trolley access barriers under existing conditions that would be greatly improved by construction of a bridge.

As discussed in our NOP comment letter:

*The City’s Biology Guidelines require a deviation for projects that propose wetland impacts. While there is a deviation option for essential public projects (EPP), the project must be essential in both location and need. Based on traffic analysis in the 2001 DEIR, construction of the Mission City Parkway Bridge at this location did not appear necessary and other alternatives were available with lesser biological impacts including the retrofit of existing bridges at Mission Center Road, Camino del Este, Ward Road, or Stadium Way. On May 28, 2002, the City Council and mayor voted unanimously to deny the permit for the Mission City Parkway Bridge because it “could result in maximum disturbance to environmentally sensitive lands” and “increase the alterations of natural landforms which would result in undue risks.” Further, they did “not believe that the proposed development is consistent with the City of San Diego’s MSCP Subarea Plan,” and “would contribute to increase in water quality degradation in an already impaired water body” (USFWS/CDFW, July 2023).*

Given the information provided above, CDFW encourages the Lead Agency to consider whether the Project, as it is currently described and analyzed, will satisfy the needs of City residents as intended while still meeting its natural resources conservation goals and regional planning obligations.

2. MHPA Clarification. As indicated in prior comment letters, CDFW has ongoing concerns about the significant biological impacts from the removal of habitat and the

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additional fragmentation that the proposed bridge would cause to the MHPA. The DEIR explains that,

*SDSU is not signatory to the MSCP and is therefore not a 'Permittee' under this HCP. However, pursuant to a memorandum of understanding between SDSU and the City, project activities will require discretionary approval from the City and, therefore, bridge design and construction will be done in a manner consistent with the MSCP, including the City's ESL Regulations and SDBG, which provide a compliance and implementation mechanism for the Subarea Plan and its Implementing Agreements (City Land Development Code [LDC] Section 143.0103). Because SDSU is not a Permittee of this HCP, and because SDSU does not need to obtain any entitlements that would constitute a discretionary action by the City, the restrictions typically placed on land within the MHPA as per the SDBG do not apply to SDSU or SDSU-owned land. SDSU also is subject to the City's land use policies.*

On January 4, 2024, the City of San Diego issued a letter to the Wildlife Agencies, declaring the bridge a City of San Diego EPP, which allows deviations from the Environmentally Sensitive Land regulations. Table 3.3-9 in the DEIR analyzes compliance with wetland deviation requirements under the EPP option:

**Table 3.3-9. Summary of Compliance with Wetland Deviation Requirements Under Land Development Code Essential Public Project Option**

Requirement	Compliance
Project meets Essential Public Project definition as defined in Land Development Code (LDC) Section 143.0150(d)(1) and the San Diego Biology Guidelines (SDBG)	The proposed project meets the Essential Public Project definition as stated in LDC Section 143.0150(d)(1)(ii) and (iii) and the SDBG because the activities described are a linear infrastructure project identified in the Mission Valley Community Plan as a proposed connection. In addition, the project would provide a high-water crossing in eastern Mission Valley and improve emergency evacuation.
No Project Alternative does not meet project objectives	The No Project Alternative would avoid impacts to wetlands, but would not improve emergency access or provide a high-water crossing in eastern Mission Valley.
Wetlands Avoidance Alternative does not meet project objectives	Wetland avoidance alternatives are not feasible either due to the amount of infrastructure that would need to be rerouted or occupied housing that would need to be demolished in order to accommodate a bridge that did not need piers.
Wetland Impact Minimization Alternatives do not meet project objectives	The wetland impact minimization alternative (Pedestrian/Bicycle Bridge Only Alternative) would result in a smaller bridge that could not accommodate vehicle access.
Wetland impacts are minimized to the maximum extent practicable	Construction of the proposed bridge is entirely within the "no credit area" of the City's Stadium Wetland Mitigation Site, which was reserved for a bridge crossing to be created, and further minimization would not meet the project objectives allowing vehicle access.
All impacts are mitigated in accordance with SDBG Table 2a	TBD - pending the City's decision about the boundary line adjustment to the MHPA
Project does not have a significant adverse impact to the MSCP or the Vernal Pool Habitat Conservation Plan	TBD - pending the City's decision about the boundary line adjustment to the MHPA

The table indicates that a boundary line adjustment (BLA) to the MHPA is being considered by the City; however, in a meeting with the Wildlife Agencies on May 23,

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2024, the City clarified that they have determined that the table is incorrect and that a BLA is not needed because the bridge is considered a conditionally compatible use.

**Recommendation #2:** CDFW recommends that the DEIR be updated to discuss the relationship between an EPP and development in MHPA habitat. Table 3.3-9 should be updated to reflect the City's determination that a BLA will not be needed.

**Recommendation #3:** CDFW recommends that the DEIR be updated to describe and analyze direct impacts to the MHPA including impact acreage calculations and overall preserve function. The final EIR should also ensure that any impacts are consistent with the conservation strategy in the MSCP. CDFW recommends that the Project proponent and City consult with the Wildlife Agencies on appropriate mitigation to offset any MHPA impacts to yield a net benefit to the MHPA, in terms of acreage and function.

3. Alternatives Analysis: The DEIR provides an alternatives analysis that includes: a no project alternative, a pedestrian/bicycle only bridge alternative, a tied-arch bridge alternative, and a suspension bridge alternative. The document also discusses alternatives that were considered but rejected as infeasible, including a retrofit of the Qualcomm Way bridge and the Ward Road bridge. Although the DEIR discusses the infeasibility of bridge retrofit alternatives for Qualcomm Way and Ward Road, there is not a discussion of potentially retrofitting the bridges at Mission Center Road or Camino del Este.

**Recommendation #4:** CDFW recommends that the FEIR analyze feasibility of retrofitting bridges at Mission Center Road and Camino del Este.

4. Western Spadefoot: The Project will impact suitable habitat for western spadefoot, which has a moderate potential to occur on site. The DEIR informs that direct impacts to suitable habitat for western spadefoot will be reduced to a less than significant level, through implementation of MM-BIO-2, which provides compensatory mitigation for loss of habitat. Although we appreciate the inclusion of MM BIO-2, the DEIR does not analyze potential impacts to the species or implement avoidance measures to ensure that impacts to spadefoot are avoided. Additional species-specific avoidance and minimization measures may be appropriate to reduce potential impacts to the species to less than significant.

**Recommendation #5:** We recommend that the Project applicant and City coordinate with the Wildlife Agencies to determine whether additional species-specific avoidance and minimization measures are needed to ensure impacts to western spadefoot are less than significant.

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5. Lake and Streambed Alteration Agreement: The Requested Project Approvals section in the DEIR (2.6.2) indicates that CSU will obtain a LSA Agreement, pursuant to Fish and Game Code section 1600 *et seq.* We look forward to further coordination with CSU, and receipt of the streambed notification package for the Project.
6. Scientific Collecting Permits. Mitigation Measure BIO-9 (MM-BIO-9) in the DEIR summarizes the duties of the on-site Project biologist. The measure indicates that the biologist will flush non-listed wildlife species (i.e., reptiles, mammals, avian, or other mobile species) immediately prior to brush-clearing activities. If wildlife will be physically moved outside the scope of a LSA Agreement, the on-site biologists should be required to obtain Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife, including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the Project site, unless they are a federally and/or state-listed species in which coordination and direction from USFWS and/or CDFW, respectively, shall be required. Additional information is available at: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

**Recommendation #6:** CDFW recommends that MM-BIO-9 be updated to reflect that on-site biologists will be required to obtain a Scientific Collecting Permit (SCP) if wildlife will be physically moved or flushed from the Project site.

## 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 filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT 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.)

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## CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist CSU in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that CSU 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 Jessie Lane, Environmental Scientist, at (858) 354-4105 or [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov).

Sincerely,

  
Victoria Tang  
Environmental Program Manager  
South Coast Region

## Attachments

Attachment A: Draft Mitigation and Monitoring Reporting Plan  
Attachment B: Figure 3.3.1 (DEIR)

EC: California Department of Fish and Wildlife  
Victoria Tang  
Jennifer Turner  
Jessie Lane  
Steve Gibson  
Meredith Osborne  
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California Department of Fish and Wildlife. March 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

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### Attachment A: Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
Mitigation Measure #1	<p>MM-BIO-5 Pre-Construction Survey for Crotch's Bumble Bee and Take Avoidance.</p> <p>If ground-disturbing activities occur outside of the overwintering season, a pre-construction surveys for Crotch's bumble bee (<i>Bombus crotchii</i>) shall occur within the construction area between February and October prior to the start of construction activities. <b>Surveys shall be conducted by a qualified entomologist familiar with the species' behavior and life history.</b> Crotch's bumble bee is a habitat generalist, ground-nesting bee. Surveys and other relevant recommendations will be in accordance with the most recent protocol available at the time of the surveys. The survey shall focus on detecting nests for Crotch's bumble bee within the construction area, <b>as well as foraging individuals.</b> If active nests of Crotch's bumble bee are present, an appropriate no disturbance buffer zone should be established around the nest to reduce the risk of disturbance or accidental take. <b>If a nest is detected or if foraging individuals are observed, the Project biologist will consult with CDFW to confirm that any proposed site-specific avoidance measures are sufficient to avoid take.</b></p>	Before construction	CSU

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	<p>If active nests cannot be avoided <b>or take of foraging individuals is anticipated</b>, an Incidental Take Permit may be needed and mitigation for direct impacts to Crotch's bumble bee will be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process. <b>If foraging individuals are detected and an Incidental Take Permit will not be pursued, compensatory mitigation for loss of foraging habitat will be provided at a 1:1 replacement ratio.</b> Mitigation will be accomplished either through off site conservation; <del>or through a California Department of Fish and Wildlife (CDFW) approved mitigation bank.</del> <del>If mitigation is not purchased through a mitigation bank and lands are conserved separately,</del> a cost estimate will be prepared to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of a maintenance fund to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record will take into account all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development.</p>		
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	<p>Documentation/Reporting: The biologist shall submit a report to the City of San Diego and Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) documenting the methods and results of the surveys prior to clearing/grubbing activities.</p> <p>Timing: Surveys will be completed between February and October prior to the start of construction activities.</p>		
Mitigation Measure #2	MM-BIO-2 and MM-BIO-18 shall be updated to reflect that temporary and permanent impacts to southern cottonwood-willow riparian forest will be mitigated at a 4:1 ratio, at a minimum	Before construction	CSU
Recommendation #1	<p>Given the Project may result in take of least Bell's vireo (Fish and Game Code, § 86), or lead to potential nest abandonment, CDFW recommends that the Final EIR specify that a CESA ITP will be obtained for take of vireo, and that the document be updated to consistently reflect this throughout each applicable section (i.e. Requested Project Approvals section, MM-BIO-1, and Executive Summary). Authorization from CDFW may include an ITP or a consistency determination (CD)(Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Requirements to meet the CESA 'fully mitigated standard' may differ from federal requirements, so early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. The fourth sentence of Mitigation Measure BIO-1 (MM BIO-1) should be updated to read: "Take authorization <del>may</del> <b>shall</b> be obtained through the federal Section 7 Consultation or Section 10 and state 2081 incidental take permit requirements." Additionally, the 'monitoring' section of MM BIO-1 shall be updated to read: "The USFWS- <b>and CDFW</b>-approved project biologist</p>	Before certification of FEIR	CSU

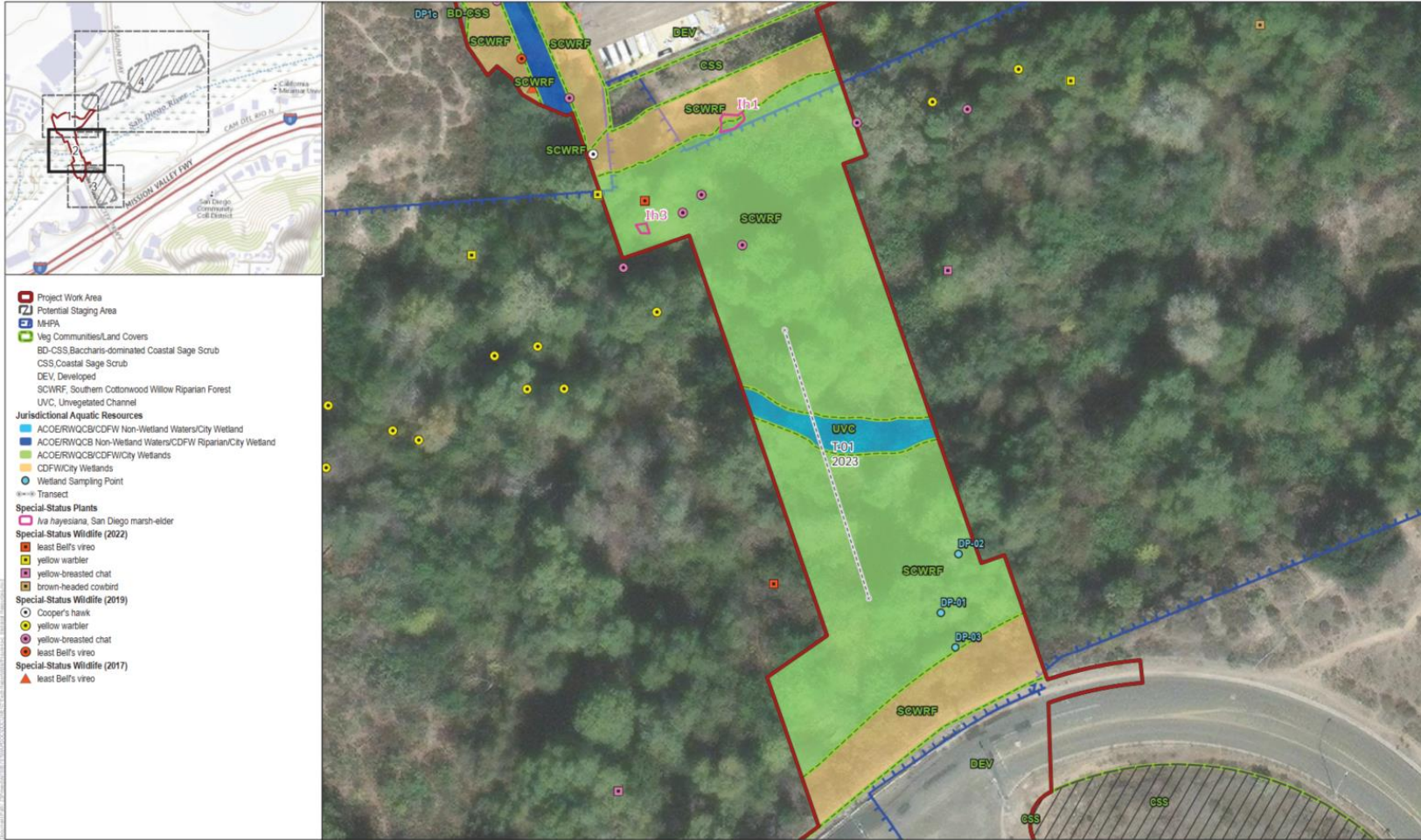
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	will be on site during the activities specified in condition 4 above.”		
Recommendation #2	CDFW recommends that the DEIR be updated to discuss the relationship between an EPP and development in MHPA habitat. Table 3.3-9 should be updated to reflect the City's determination that a BLA will not be needed.	Before certification of FEIR	CSU
Recommendation #3	CDFW recommends that the DEIR be updated to describe and analyze direct impacts to the MHPA including impact acreage calculations and overall preserve function. The final EIR should also ensure that any impacts are consistent with the conservation strategy in the MSCP. CDFW recommends that the Project proponent and City consult with the Wildlife Agencies on appropriate mitigation to offset any MHPA impacts to yield a net benefit to the MHPA, in terms of acreage and function.	Before certification of FEIR	CSU
Recommendation #4	CDFW recommends that the FEIR analyze feasibility of retrofitting bridges at Mission Center Road and Camino del Este.	Before certification of FEIR	CSU
Recommendation #5	We recommend that the Project applicant and City coordinate with the Wildlife Agencies to determine whether additional species-specific avoidance and minimization measures are needed to ensure impacts to western spadefoot are less than significant.	Before certification of FEIR	CSU
Recommendation #6	CDFW recommends that MM-BIO-9 be updated to reflect that on site biologists will be required to obtain a Scientific Collecting Permit (SCP), if wildlife will be physically moved or flushed from the Project site.	Before certification of FEIR	CSU

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**Attachment B: Figure 3.3.1 (DEIR)**

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SOURCE: ESRI IMAGERY 2022; SOSU IMAGERY AUG 2023; CITY OF SAN DIEGO 2023; BOWMAN/PDC 5/08/2023; GROUP DELTA 5/12/2023



**FIGURE 3.3-1- View 2**  
 Biological Resources  
 Fenton Parkway Bridge Project EIR