



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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GAVIN NEWSOM, Governor
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February 8, 2024

Michael Ressler
City of Vista
200 Civic Center Drive
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SUBJECT: MITIGATED NEGATIVE DECLARATION FOR LAS LOMAS GRADING PROJECT, SCH #2024010143, CITY OF VISTA, SAN DIEGO COUNTY

Dear Michael Ressler:

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) for the Las Lomas Grading Project (Project) proposed by the City of Vista (City). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's 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; California Environmental Quality Act (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.

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", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G.

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Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Summary

Objective: The Project seeks approval of a Land Development Permit and Grading Plan to allow rough grading of Assessor's Parcel Number 174-260-15 in the City. The proposed Project would also widen adjacent roadways to improve access to the site and existing residential community north and east of the Project site. An additional Project component is the creation of a 20-foot-wide fire equipment emergency access road from the eastern terminus of Kings Way, located west of the site, to Tierra Del Cielo.

Location: The Project site is located on Las Lomas Road, Parcel E Vista, CA 92084. The 2.93-acre parcel is bound by Las Lomas to the north, Tierra Del Cielo to the west, and private roads.

Biological Setting: The parcel is currently undeveloped and supports native vegetation. The northern quarter of the parcel, which has a slight north-facing slope, supports Diegan coastal sage scrub (CSS), while the area to the south, which slopes west or south, supports southern mixed chaparral (SMC). The Project site also may support several special status wildlife species, including the San Diego desert woodrat (*Neotoma lepida intermedia*; California Species of Special Concern (SSC)); red diamond rattlesnake (*Crotalus ruber*; SSC); and orange-throated whiptail (*Aspidoscelis hyperythra*; CDFW Watch List). The Project site also has the potential for occurrence of rare plants, including Parry's tetracoccus (*Tetracoccus dioicus*) and ashy spike moss (*Selaginella cinerascens*).

Comments and Recommendations

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

Impacts to Special Status Species

Issue: BIO-3 in the MND may not mitigate to below significant for impacts to special status species that were observed or have high potential to occur on site.

Specific impact: The MND indicated on page 3-21 that several special status wildlife species, including San Diego woodrat, red diamond rattlesnake, and orange-throated whiptail, can be found within or in the vicinity of the Project site. In addition, ashy spike moss, California Rare Plant Rank 4B.1, is found on site. Project activities such as grading and grubbing may result in habitat destruction, causing the death or injury of plant populations and wildlife adults, juveniles, eggs, or hatchlings. In addition, the

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Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat for special status species.

Why impact would occur: BIO-3 on page 3-24 indicates that grading 1.92 acres of habitat will impact San Diego woodrat, red diamond rattlesnake, orange-throated whiptail, and ashy spike moss. This impact will be mitigated through the preservation of 0.69 acres of CSS and 0.29 acres of SMC habitat on Lot 7, as well as preservation of 0.64 acres of CSS habitat at the Red Mountain Conservation Bank. In total, the preservation is equivalent to 1.62 acres, which is less than a 1:1 mitigation ratio. In addition, the MND does not identify whether the habitat for any of these special status species can be found at the Red Mountain Conservation Bank, potentially not mitigating for some species at all. In general, CDFW does not support mitigation at less than a 1:1 ratio for impacts to special-status species and their habitats. This is of particular concern in the case of preservation of habitat as mitigation (as opposed to restoration or creation) because there is still a net loss of the habitat that supports special status species. Additionally, there is no biological justification provided in the MND that demonstrates that the proposed mitigation will function to support the special status flora and fauna current on site. Without additional mitigation, the Project may continue to have adverse direct, indirect, and cumulative effects, either directly or through habitat modifications, on biological resources.

In addition to mitigation/preservation concerns, CDFW is also concerned that impacts to species could occur during Project implementation. The MND does not propose any measures for avoidance or minimization specific to individual species at this stage of the Project. Without appropriate avoidance or minimization measures, impacts to a special status species could result from ground disturbing and vegetation removal activities. Wildlife may be trapped or crushed under structures. Large equipment, equipment and material staging, and vehicle and foot traffic could trample or bury wildlife. Special status species could be injured or killed.

Evidence impact would be significant: CEQA provides protection not only for CESA and Federal Endangered Species Act (ESA)-listed species, but for any species including but not limited to California Species of Special Concern that can be shown to meet the criteria for State listing. These Species of Special Concern meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065).

About rare plant habitat: the basic purpose of an environmental document is to provide public agencies and the public in general with detailed information about the effect a proposed project is likely to have on the environment, and ways and manners in which the significant effects of such a project might be minimized (Pub. Resources Code, §§ 21002.1, 21061). The MND does not discuss the ways and manners in which the preservation of the acreage on site and at the Red Mountain Conservation Bank would appropriately mitigate for the Project's direct and indirect impacts on ashy spike moss.

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Additionally, CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles; amphibians; fish; plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1 – Preservation Ratio: BIO-3 shall provide mitigation through preservation at a minimum 1:1 ratio for impacts to 1.92 acres. The acreage preserved shall have suitable or occupied habitat for all special status species as indicated in BIO-3. Areas proposed for preservation shall have a recorded conservation easement and be dedicated to an entity that has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

Mitigation Measure #2 – Biological Monitor: A qualified biologist shall be on site daily to move out of harm's way wildlife of low mobility, including but not limited to: San Diego woodrat, red diamond rattlesnake, and orange-throated whiptail, that would be injured or killed during all Project activities. Wildlife shall be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to suitable habitat adjacent to the Project site. In areas where any SSC is found, work may only occur in these areas after a qualified biologist has determined it is safe to do so, and the qualified biologist shall advise workers to proceed with caution near flagged areas.

Mitigation Measure #3 – Scientific Collecting Permit: The City shall require the Project Applicant retain a qualified biologist with appropriate handling permits, or shall obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.

Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW 2024a).

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Mitigation Measure #4- Injured or Dead Wildlife: If any special status wildlife species are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

Mitigation Measure #5 – Rare Plants: For unavoidable impacts to rare and sensitive plants on the Project site with a California Rare Plant Rank (CRPR) greater than or equal to 3, replacement ratios for mitigation shall be implemented, at a 2:1 ratio. For plants with a CRPR less than 3, mitigation at a 3:1 ratio shall be implemented. All revegetation/restoration areas that will serve as mitigation shall include preparation of a restoration plan, to be approved by CDFW prior to any ground disturbance. The restoration plan shall include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

Additional Recommendations

Recommendation #1 – BIO-2: BIO-2 on page 3-24 of the MND states, “[i]mpacts to three individuals of Parry’s tetracoccus shall be mitigated at a 3:1 ratio with the preservation of 12 of the 22 Parry’s tetracoccus on the undeveloped portion of the Lot 7 parcel to be preserved. The additional ten Parry’s tetracoccus on the Lot 7 parcel will also be preserved.” It is unclear how the preservation ratio of 3:1 was arrived at when 22 Parry’s tetracoccus individuals will be preserved on site. It is strongly recommended that the MND be amended to include a thorough discussion of the mitigation ratios. This discussion should include a robust Mitigation Monitoring and Reporting Plan. Compensatory mitigation should also include land protection instruments, restoration, and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

Recommendation #2 – Nesting Birds: The MND proposes BIO-4 to avoid impacts to nesting birds; however, the measure as proposed may not reduce the Project impact on

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nesting birds to less than significant. CDFW recommends adding the underlined language:

“All shrub trimming, thinning, or removal will be performed prior to or after the bird-breeding season, January 1 through September 15 (i.e., only between September 16 and December 31). If clearing is planned to occur during the bird-breeding season, pre-construction nest surveys shall be conducted prior to any clearing. Survey for active nests must be conducted by a qualified biologist to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. Work may proceed if no active bird nests are detected. If active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) should be established around such active nests. A minimum 100-foot no-disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City. By avoiding clearing during the bird-breeding season or performing surveys to ensure no active nests are present prior to clearing, the proposed Project will ensure compliance with the MBTA and pertinent sections of the CFG Code.”

It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation is necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the City desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence of a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Recommendation #3 – Environmental Data: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity Database) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2024b). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW’s Vegetation Classification and Mapping Program (CDFW 2024c).

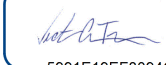
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Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist the City of Vista in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Felicia Silva, Senior Environmental Scientist (Specialist), at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:



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Victoria Tang

Environmental Program Manager I
South Coast Region

cc: California Department of Fish and Wildlife

Jennifer Turner, Senior Environmental Scientist (Supervisory) – San Diego
Brigid Moran, Environmental Scientist – San Diego
Cindy Hailey, Staff Services Analyst – San Diego
CEQA Program Coordinator – Sacramento

Office of Planning and Research

State Clearinghouse – State.Clearinghouse@opr.ca.gov

References:

[CDFW] California Department of Fish and Wildlife. 2024a. Scientific Collecting Permit. Available from: <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>

[CDFW] California Department of Fish and Wildlife. 2024b. Submitting Data to the CNDDDB. Available at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

[CDFW] California Department of Fish and Wildlife. 2024c. Combined Rapid Assessment and Releve Form. Available at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into the Project's environmental document.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- Preservation Ratio	BIO-3 shall provide mitigation through preservation at a minimum 1:1 ratio for impacts to 1.92 acres. The acreage preserved shall have suitable or occupied habitat for all special status species as indicated in BIO-3. Areas proposed for preservation shall have a recorded conservation easement and be dedicated to an entity that has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968)	Prior to finalizing CEQA document	City of Vista (City)/Project Applicant
MM-BIO-2- Biological Monitor	A qualified biologist shall be on site daily to move out of harm's way wildlife of low mobility, including but not limited to San Diego woodrat, red diamond rattlesnake, and orange throated whiptail, that would be injured or killed during all Project activities. Wildlife shall be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to suitable habitat adjacent to the Project site. In areas where any SSC is found, work may only occur in these areas after a qualified biologist has determined it is safe to do so, and the qualified biologist shall advise workers to proceed with caution near flagged areas.	Prior to issuance of development permit	City/Project Applicant
MM-BIO-3- Scientific Collecting Permit	The City shall require the Project Applicant retain a qualified biologist with appropriate handling permits, or shall obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid	Prior to finalizing CEQA document	City/Project Applicant

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	<p>harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW’s Scientific Collection Permits webpage for information (CDFW 2024a).</p>		
<p>MM-BIO-4- Injured or Dead Wildlife</p>	<p>If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist shall be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</p>	<p>Prior to issuance of development permit</p>	<p>City/Project Applicant</p>
<p>MM-BIO-5-Rare Plants</p>	<p>The MND shall require the Project Applicant to avoid any rare and sensitive plants found on the Project site. If avoidance is not feasibleFor unavoidable impacts to rare and sensitive plants on the Project site with a California Rare Plant Rank (CRPR) greater than or equal to 3, replacement ratios for mitigation should all be implemented, at no less than a 2:1 ratio. An even greater mitigation ratio shall be implemented to For plants with a CRPR less than 3, mitigation at a 3:1 ratio shall be implemented. All revegetation/restoration areas that will serve as mitigation shall include preparation of a restoration plan, to be approved by CDFW prior to any ground disturbance. The restoration plan shall include</p>	<p>Prior to issuance of development permit</p>	<p>City/Project Applicant</p>

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	restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).		
REC-1-BIO-2	BIO-2 on page 3-24 of the MND states, “[I]mpacts to three individuals of Parry’s tetracoccus shall be mitigated at a 3:1 ratio with the preservation of 12 of the 22 Parry’s tetracoccus on the undeveloped portion of the Lot 7 parcel to be preserved. The additional ten Parry’s tetracoccus on the Lot 7 parcel will also be preserved.” It is unclear how the preservation ratio of 3:1 was arrived at when 22 Parry’s tetracoccus individuals will be preserved on site. It is strongly recommended that the MND be amended to include a thorough discussion of the mitigation ratios. This discussion should include a robust Mitigation Monitoring and Reporting Plan. Compensatory mitigation should also include land protection instruments, restoration, and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).	Prior to issuance of development permit	City/Project Applicant
REC-2- Nesting Birds	The MND proposes BIO-4 to avoid impacts to nesting birds; however, the measure as proposed may not reduce the Project impact on nesting birds to less than significant. CDFW recommends removing the language with a strikethrough and adding the <u>underlined</u> language:	Prior to issuance of development permit	City/Project Applicant

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	<p>“All shrub trimming, thinning, or removal will be performed prior to or after the bird-breeding season, January 1 through September 15 (i.e., only between September 16 and December 31). If clearing is planned to occur during the bird-breeding season, pre-construction nest surveys shall be conducted prior to any clearing. <u>Survey for active nests must be conducted by a qualified biologist to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. Work may proceed if no active bird nests are detected. If active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) should be established around such active nests. A minimum 100-foot no- disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City.</u> By avoiding clearing during the bird-breeding season or performing surveys to ensure no active nests are present prior to clearing, the proposed Project will ensure compliance with the MBTA and pertinent sections of the CFG Code.”</p> <p>It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation is necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the City</p>		
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	<p>desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.</p>		
<p>REC-3- Environmental Data</p>	<p>CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity Database) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms (CDFW 2024b). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2024c).</p>	<p>Prior to finalizing CEQA document</p>	<p>City/Project Applicant</p>