



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 24, 2025

Sean del Solar
Senior Planner
City of San Marcos
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SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ARMORLITE LOFTS PROJECT, SCH NO. 2024020372, SAN DIEGO COUNTY, CA

Dear Sean del Solar:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the City of San Marcos (City) for the Armorlite Lofts (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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 may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City was a local jurisdiction participant in the planning of the Subregional Multiple Habitat Conservation Program (MHCP) in the late 1990's and early 2000's. The City had prepared a draft Subarea Plan (SAP) under the Subregional MHCP, which addressed regional conservation planning across seven incorporated jurisdictions in northern San Diego County. However, the San Marcos SAP was not finalized, and state and federal permits have not been issued to the City.

PROJECT DESCRIPTION SUMMARY

Proponent: City

Objective: The objective of the Project is to construct 165 residential apartments on a 2.44-acre site. The development will also incorporate 5,600 square feet of commercial use, parking, shared indoor space, and private open space. Project activities will include grading, use of blasting and/or a rock crusher, construction of buildings, construction of retaining walls, and landscaping.

Location: The Project site is located at 225 North Las Posas Road in the City of San Marcos. The site is located on the north side of Armorlite Drive, between North Las Posas Road to the west and Bingham Drive to the east. Primary access to the Project site will be through an unsignalized driveway on Armorlite Drive.

Biological Setting: The Project site contains 2.13 acres of Diegan coastal sage scrub and 0.12 acre of non-native grassland. Diegan coastal sage scrub provides suitable nesting and foraging habitat for special status species such as the coastal California gnatcatcher (*Polioptila californica californica*; CDFW Species of Special Concern (SSC), Federal Endangered Species Act (ESA) listed threatened). The Biological Technical Report (BTR; Dudek 2024) indicates that protocol gnatcatcher surveys were conducted in 2022-2023 and were negative. The Project site is within designated critical habitat for San Diego fairy shrimp (*Branchinecta sandiegonensis*; ESA listed-endangered); however, the BTR states that no vernal pools were detected on the Project site during

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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wet season surveys in 2022-2023. The BTR also identifies several pocket mouse species as having a low potential to occur, including: Dulzura pocket mouse (*Chaetodipus californicus femoralis*; SSC), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*; SSC), and Pacific pocket mouse (*Perognathus longimembris pacificus*; ESA listed- endangered, SSC). The Project will develop the entire site, removing all existing vegetation. Off-site mitigation for the permanent loss of 2.13 acres of Diegan coastal sage scrub is proposed at a 1:1 ratio and mitigation for the permanent loss of 0.12 acre of non-native grassland is proposed at a 0.5:1 ratio. The DEIR indicates that mitigation will be achieved through off-site acquisition, in lieu fees, purchase of credits from an approved mitigation bank, or a combination as approved by the City's Planning Manager and the Wildlife Agencies (CDFW and the U.S. Fish and Wildlife Service).

Project History: CDFW previously issued a comment letter in response to the Notice of Preparation (NOP) of the DEIR, on March 12, 2024 (CDFW, 2024).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Crotch's Bumble Bee

Issue: The Project may impact suitable nesting and foraging habitat for Crotch's bumble bee, a candidate species for CESA listing. The DEIR and BTR do not include any discussion of Crotch's bumble bee or propose species-specific mitigation measures.

Specific impact: The Project site contains habitat that may support nesting or foraging Crotch's bumble bee (*Bombus crotchii*; candidate CESA listing). Crotch's bumble bee often nests underground, sometimes occupying abandoned rodent burrows (Hatfield et al., 2015). The BTR indicates that the site supports small mammal burrows, which may provide suitable habitat for nesting. Crotch's bumble bee may forage in the native habitat on or adjacent to the Project site. If Crotch's bumble bee are using burrows on the Project site for nesting, direct impacts could result from ground-disturbing activities, which could lead to death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success. Indirect impacts may occur from loss of foraging resources.

Why impact would occur: Crotch's bumble bee is not identified in the DEIR as a sensitive species with the potential to occur in the survey area, and there is no assessment of suitable habitat included in the BTR. The final DEIR should incorporate a Crotch's bumble-bee specific mitigation measure that includes focused surveys where habitat is present, as well as a cumulative impact analysis. Absent inclusion of Crotch's

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bumble bee in the DEIR, the document may not adequately assess potential impacts to a CESA candidate species, resulting in unpermitted take. If Crotch's bumble bee is detected during focused surveys, the Project may require a CESA Incidental Take Permit, given that the whole site will be developed and avoidance is not feasible. Proposed mitigation for take of a CESA candidate species and loss of habitat must be of sufficient detail to meet the 'fully mitigated standard' pursuant to CESA.

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, 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 Incidental Take Permit or other authorization (Fish & G. Code, §§ 2080, 2085). 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)

CDFW recommends that the City incorporate the below Crotch's bumble bee-specific mitigation measure into the Final EIR:

Mitigation Measure #1: Crotch's Bumble Bee.

To mitigate potential impacts to Crotch's bumble bee:

a. A qualified entomologist familiar with the species' behavior and life history shall conduct a species-specific survey of suitable habitat within the Project area and surrounding buffer. Surveys shall occur between February and October, 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.

b. If nesting or foraging bees are detected, the site shall be considered occupied, and the Project biologist will notify CDFW. An Incidental Take Permit will be needed for take of Crotch's bumble bee, and mitigation 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

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Take Permit will not be pursued, compensatory mitigation for loss of foraging habitat will be provided at a 1:1 replacement ratio.

d. The qualified entomologist or monitoring biologist shall submit a report to the City and CDFW, documenting the methods and results of the surveys prior to clearing/grubbing activities.

COMMENT # 2: Pocket Mouse

Issue: The Project may impact habitat for pocket mouse species, including the Dulzura pocket mouse and northwestern San Diego pocket mouse, both SSC.

Specific impact: The Project site contains coastal sage scrub habitat that may support northwestern San Diego pocket mouse and/or Dulzura pocket mouse. Though pocket mice were not observed during biological reconnaissance surveys, small mammal trapping was not conducted. Pocket mice are cryptic, and their presence is unlikely to be detected through general reconnaissance surveys. Their small size, nocturnal activity, and burrowing behavior necessitate species-specific survey methods, such as live trapping using Sherman traps and use of track tubes (Kelt, 1996; Brehme et. al, 2019). If pocket mice occupy the site, direct impacts from ground disturbance, grading, and vegetation removal could result in mortality, burrow collapse, and displacement. Indirect impacts, including increased edge effects, predation, and habitat fragmentation, may further jeopardize local populations.

Why impact would occur: The DEIR does not include trapping surveys specific to pocket mice, making it possible that potential impacts are underestimated. Without focused surveys, the Project risks unmitigated impacts to SSC. The BTR indicates that, while there is suitable coastal scrub habitat for Dulzura pocket mouse, the site is relatively small and surrounded by development, so the species was identified as having a low potential to occur. Similarly, the BTR indicates that there is suitable coastal scrub habitat for northwestern San Diego pocket mouse, though the site lacks gravelly or sandy soil typically used for burrows. The BTR reiterates that the site is relatively small and isolated from larger undeveloped lands northeast of the Project site, which are more likely to be utilized, and indicates that the species has a low potential to occur. However, the BTR for the neighboring Palomar Station Specific Plan (City of San Marcos, 2004) indicated that northwestern San Diego Pocket mouse is potentially present in the Project area and is known to be in the region in substantial numbers. Though habitat fragment size plays a role in species richness and diversity, a smaller fragment of several acres does not necessarily preclude occupation by pocket mice (Johnson, 2016). The MHCP indicates that northwestern San Diego pocket mouse does not likely disperse well through developed areas or over roads, so some populations may be isolated. Given that both species of pocket mice have been documented within 5 miles of the Project site (CNDDDB, 2025) and may occur in fragmented habitat remnants, CDFW recommends small mammal trapping surveys and species-specific mitigation for Dulzura pocket mouse and northwestern San Diego pocket mouse.

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Evidence impact would be significant: The northwestern San Diego pocket mouse and Dulzura pocket mouse are designated as California SSC due to habitat loss and fragmentation. As per CEQA Section 15380, impacts to species identified as California SSC are considered significant due to their designation as species requiring special attention and protection. These species are recognized by CDFW as being at risk or vulnerable. Impacts to species listed as endangered, threatened, or rare by federal or state agencies, such as those designated as California SSC, are presumed to be significant impacts under CEQA (CEQA §§ 15063 & 15065). Any adverse effects on these species would be presumed to have significant environmental impacts and would require thorough analysis and mitigation measures implemented within the EIR to minimize or avoid such impacts.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends that the City incorporate the below pocket mouse-specific mitigation measure into the Final EIR:

Mitigation Measure #2: Dulzura Pocket Mouse and Northwestern San Diego Pocket Mouse

To mitigate potential impacts to Dulzura pocket mouse and northwestern San Diego pocket mouse:

- a. A qualified biologist with experience in small mammal trapping shall conduct focused small mammal surveys across the Project site, with the target species being Dulzura pocket mouse and northwestern San Diego pocket mouse. Focused surveys shall include at least three consecutive nights of small mammal trapping, using Sherman live traps. Surveys shall be timed to the appropriate season when the species are most active, typically between March and September.
- b. Any biologists conducting trapping surveys shall possess a Scientific Collecting Permit. 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). For more information, please see CDFW's [Scientific Collecting Permit webpage](#)³.
- c. Target species, along with incidentally captured species shall be documented, and the results of the survey shall be shared with the Wildlife Agencies.
- d. If Dulzura pocket mouse, northwestern San Diego pocket mouse, or other special-status small mammals are detected during focused small mammal surveys, compensatory mitigation will be established for impacts to the species. Mitigation shall

³ <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

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be developed in coordination with the Wildlife Agencies, which may include a higher mitigation ratio for coastal sage scrub, and additional measures such as trapping and relocation of pocket mice to occupied habitat.

ADDITIONAL COMMENTS

COMMENT # 3: Compensatory Mitigation. The City proposes mitigation ratios of 1:1 for Diegan coastal sage scrub and 0.5:1 for non-native grassland, which are consistent with the ratios established in the City's Draft SAP; however, those ratios may not fully account for the ecological value and functional loss of these habitats. The Draft SAP included development of a City-wide preserve system to meet MHCP biological conservation goals. Given that the SAP was not formally adopted, and the preserve system is not in place, the City should consider mitigation ratios that better align with regional conservation objectives and the sensitivity of these habitat types. Diegan coastal sage scrub is a high-priority habitat under the MHCP's regional conservation efforts due to its limited distribution and the species it supports, including federally listed species such as the coastal California gnatcatcher. Absent a City-wide preserve system, a higher mitigation ratio for individual project impacts would better support long-term conservation goals and contribute to regional habitat connectivity in the City. CDFW suggests a mitigation ratio of at least 2:1 for Diegan coastal sage scrub impacts, to ensure no net loss of habitat function within the City. Though non-native grassland is a lower-priority habitat, it still provides important foraging habitat for raptors and other wildlife. CDFW suggests at least a 1:1 mitigation ratio for non-native grassland to maintain ecological functions.

COMMENT # 4: Cumulative Impact Analysis. The Cumulative Impact Analysis in the DEIR is incomplete. Table 2-3 provides an inventory of past, present, and reasonably foreseeable future projects within the vicinity of the Project site; however, the development immediately adjacent to the Project site is not included. Furthermore, the DEIR does not disclose that the Project site falls in the northwestern corner of a polygon that is identified as a Vernal Pool Major Amendment Area in table 2.3-5 of the City's Draft SAP (circled in Attachment B). The remainder of the polygon was developed in 2013, under the Project name Palomar Station Specific Plan (City of San Marcos, 2004). That Project included development of 14.32 acres into condominiums and was required to mitigate for impacts to vernal pools, wetlands, and native habitat. Though the DEIR mentions the Palomar Station condominiums in the site history, the development is not included in the cumulative impact analysis. CDFW recommends that the Final EIR include both a discussion of the Project's location within a Vernal Pool Major Amendment Area, as well as analysis of the Palomar Station Specific Plan within the Cumulative Impact Analysis section. Based on the inclusion the Palomar Station Specific Plan in the Cumulative Impact Analysis, the EIR may need to reevaluate cumulative impacts to Crotch's bumble bee, pocket mice, and Diegan coastal sage scrub. A higher

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mitigation ratio for Diegan coastal sage scrub may be warranted, particularly if sensitive species are present.

COMMENT # 5: Coastal California Gnatcatcher. The DEIR indicates that Dudek conducted focused coastal California gnatcatcher surveys between 2022-2023, which were negative. The U.S. Fish and Wildlife Service typically requires updated surveys every two years for coastal California gnatcatcher. Depending on Project timing, updated surveys may be needed. CDFW recommends further coordination with U.S. Fish and Wildlife Service regarding coastal California gnatcatcher surveys.

COMMENT # 6: Editorial Comments.

a. Mitigation measure BIO-2c (MM BIO-2c; DEIR p. 102). MM BIO-2c incorporates biological monitor requirements and duties, to ensure compliance with mitigation measures. The second bullet point indicates that work will be halted if necessary, to ensure the proper implementation of species and habitat protection measures. The measure states that the biologist will confer with the City and U.S. Fish and Wildlife Service if work is halted. CDFW requests to be added as well.

b. 3.3.7 Conclusion (DEIR p. 103). The first sentence of the Biological Resources Conclusion in the DEIR states, “[b]ased on the presence of suitable avian nesting habitat, pre-construction clearance surveys for nesting birds would be conducted to ensure that no impacts on nesting birds that are afforded protection under the MBTA occur (see mitigation measures MM-BIO-1a and MM-BIO-1b).” The sentence should be edited to remove the word ‘clearance’, as that suggests that nesting birds may be flushed, which would violate Fish and Game Code. Additionally, Fish and Game Code should be referenced along with the MBTA. We suggest the following edit: “[b]ased on the presence of suitable avian nesting habitat, pre-construction ~~clearance~~ surveys for nesting birds ~~would~~ **will** be conducted to ensure that no impacts on nesting birds that are afforded protection under the MBTA **or Fish and Game Code** occur (see mitigation measures MM-BIO-1a and MM-BIO-1b).”

c. Mitigation Measure BIO-3 (MM BIO-3; DEIR p. 103). MM BIO-3 indicates that mitigation for impacts to Diegan coastal sage scrub and non-native grassland will be achieved through off-site acquisition, in lieu fees, or purchase of credits through a mitigation bank, as approved by the City’s Planning Manager and the Wildlife Agencies. We look forward to coordination with the City regarding habitat mitigation.

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

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suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

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 website](#)⁴ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)⁵.

The City should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).


⁴ <https://wildlife.ca.gov/Data/CNDDDB>

⁵ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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Questions regarding this letter or further coordination should be directed to Jessie Lane⁶, Environmental Scientist.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

cc: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Jennifer Turner, Senior Environmental Scientist (Supervisor)
Steve Gibson, Senior Environmental Scientist (Supervisor)
Jessie Lane, Environmental Scientist
Meredith Osborne, Environmental Scientist

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REFERENCES

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- California Department of Fish and Wildlife (2017). California Terrestrial and Vernal Pool Invertebrates of Conservation Priority.
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⁶ Phone: 858-354-4105; Email: jessie.lane@wildlife.ca.gov

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

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

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #1: Crotch’s Bumble Bee.</p> <p>To mitigate potential impacts to Crotch’s bumble bee:</p> <p>a. A qualified entomologist familiar with the species’ behavior and life history shall conduct a species-specific survey of suitable habitat within the Project area and surrounding buffer. Surveys shall occur between February and October, 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.</p> <p>b. If nesting or foraging bees are detected, the site shall be considered occupied, and the Project biologist will notify CDFW. An Incidental Take Permit will be needed for direct impacts to Crotch’s bumble bee and mitigation 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.</p> <p>d. The qualified entomologist or monitoring biologist shall submit a report to the City and CDFW, documenting the methods and results of the surveys prior to clearing/grubbing activities.</p>	<p>Prior to Project Initiation</p>	<p>City</p>

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Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #2: Dulzura Pocket Mouse and Northwestern San Diego Pocket Mouse</p> <p>To mitigate potential impacts to Dulzura pocket mouse and northwestern San Diego pocket mouse:</p> <p>a. A qualified biologist with experience in small mammal trapping shall conduct focused small mammal surveys across the Project site, with the target species being Dulzura pocket mouse and northwestern San Diego pocket mouse. Focused surveys shall include at least three consecutive nights of small mammal trapping, using Sherman live traps. Surveys shall be timed to the appropriate season when the species are most active, typically between March and September.</p> <p>b. Any biologists conducting trapping surveys shall possess a Scientific Collecting Permit. 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). For more information, please see CDFW’s Scientific Collecting Permit webpage⁷.</p> <p>c. Target species, along with incidentally captured species shall be documented, and the results of the survey shall be shared with the Wildlife Agencies.</p> <p>d. If Dulzura pocket mouse, northwestern San Diego pocket mouse, or other special-status small mammals are detected during focused small mammal surveys,</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

⁷ <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

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Mitigation Measure	Timing	Responsible Party
<p>compensatory mitigation will be established for impacts to the species. Mitigation shall be developed in coordination with the Wildlife Agencies, which may include a higher mitigation ratio for coastal sage scrub, and additional measures such as trapping and relocation of pocket mice to occupied habitat.</p>		
<p>Recommendation #1. Compensatory Mitigation. CDFW recommends that Diegan coastal sage scrub impacts be mitigated at a ratio of at least 2:1, and that non-native grassland be mitigated at a 1:1 ratio.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Recommendation #2. Cumulative Impact Analysis. CDFW recommends that the Final EIR include both a discussion of the Project’s location within a Vernal Pool Major Amendment Area, as well as analysis of the Palomar Station Specific Plan within the Cumulative Impact Analysis section. Based on the inclusion the Palomar Station Specific Plan in the Cumulative Impact Analysis, the EIR may need to reevaluate cumulative impacts to Crotch’s bumble bee, pocket mice, and Diegan coastal sage scrub. A higher mitigation ratio for Diegan coastal sage scrub may be warranted, particularly if sensitive species are present.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>
<p>Recommendation #3. Coastal California Gnatcatcher. CDFW recommends further coordination with U.S. Fish and Wildlife Service to ensure that protocol coastal California gnatcatcher surveys are up to date.</p>	<p>Prior to Project Initiation</p>	<p>Lead Agency</p>

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ATTACHMENT B: CITY OF SAN MARCOS DRAFT SAP: FIGURE 2.3-5 – FOCUSED PLANNING AREA SUBAREAS

