



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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Governor's Office of Planning & Research

February 26, 2020

FEB 26 2020

Mr. Michael Baksh
Pauma Band of Luiseño Indians
P.O. Box 369
Pauma Valley, CA 92061

STATE CLEARINGHOUSE

Subject: Notice of Preparation for the Pauma Casino Replacement and Hotel Off-Reservation Environmental Impact Report (SCH# 2020010413)

Dear Mr. Baksh:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced application filed by the Pauma Band of Luiseño Indians for the Pauma Casino Replacement and Hotel Off-Reservation Environmental Impact Report, dated January 29, 2020. The comments provided herein are based on information provided in the associated documents, our knowledge of sensitive and declining vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. In this capacity, the Department administers the California Endangered Species Act (CESA), the Native Plant Protection Act, and other provisions of the California Fish and Game Code that afford protection to the State's fish and wildlife trust resources. The Department also administers the Natural Community Conservation Planning (NCCP) Program. The Department, the U.S. Fish and Wildlife Service, and the County of San Diego (County) entered into a NCCP planning agreement in 2008 for the draft North and East County Multiple Species Conservation Program (MSCP) planning areas (NC-MSCP and EC-MSCP, respectively) to address conservation needs and future planned development in north and east county (County of San Diego, 2008 and 2013).

Off-Reservation activities associated with the Pauma Casino Expansion Project (Proposed Project) consist of the replacement of existing Casino Pauma's temporary structure with a permanent facility. The permanent facility will be entirely located on the Tribal trust land south of the existing facility, largely where a parking lot is currently located. Based on requirements of the Tribal/State Gaming Compact, environmental issues have been identified in this Off-Reservation Environmental Impact Report.

Pursuant to its jurisdiction, the Department offers the following recommendation to assist the Pauma Band of Luiseño Indians in avoiding or minimizing potential impacts to biological resources in association with the Proposed Project.

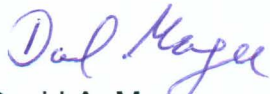
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The Department recognizes that the Proposed Project is within Tribal lands; however, the Off-Reservation environmental impacts may occur within the Preserve Area of the NC-MSCP¹. While the Department acknowledges that this is a draft Plan, we request that the Tribe take actions consistent with the NC-MSCP and other environmental regional planning efforts.

We appreciate the opportunity to comment on the proposed land transfer to Indian trust. Should you have any questions or comments regarding this letter, please contact Nasseer Idrisi of the Department at (858) 467-2720 or Nasseer.Idrisi@wildlife.ca.gov.

Sincerely,



David A. Mayer
Acting Environmental Program Manager
South Coast Region

ec: David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad Field Office
State Clearinghouse

¹ <https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/MSCP-North-County-Plan.pdf>