

OCT 31 2019

STATE CLEARINGHOUSE

Canyon View Estates

Response to September 30, 2019 CDFW Comment Letter

Comment 1

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 & Game Code, §§ 711.7, subdivision (a) & 1802; Public 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 is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game 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 & Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Response 1

The County welcomes the CDFW biological expertise during the CEQA review of potential project impacts to fish and wildlife resources. The County also agrees that the project will require subsequent regulatory compliance under the Fish and Game Code for lake and streambed alteration regulatory authorization (Fish & Game Code, § 1600 et seq.). The biological documentation for this project has not found any plants or wildlife species that fall under the regulations of the California Endangered Species Act or the Native Plant Protection Act (Pages 25 and 26 of the Initial Study [IS] and the 2017 Biological Constraints Analysis [BCA]).

Comment 2

Objective: The Project proposes to develop 37 single-family residential lots, two open space lots, one public water quality basin, and five public facility lots (basins). The proposed residential lots would occupy approximately 11.09 acres of the Project site. The remaining improved areas of the Project site would include 3.87 acres for supporting public roadway infrastructure, 2.85 acres of desilting basins, and 1.78 acres of water quality basin. Approximately 79 acres of open space is proposed. Onsite drainage would flow to the existing unnamed drainage, which is tributary to Pico Creek. Project activities include vegetation removal,

grading, home construction, road construction, municipal infrastructure construction, and ongoing fuel modification.

Location: The Project site is located south of the intersection of Pico Canyon Road and Stevenson Ranch Parkway in unincorporated Los Angeles County, within the Stevenson Ranch Area. The approximately 94-acre Project site is generally situated west of Interstate 5 (I-5), north of California State Route 118 (SR-118), south of California State Route 126 (SR-126), and east of the Los Angeles-Ventura County boundary. The Project site is located within three parcels; APNs 2826-020-012, 2826-020-013, and 2826-020-061.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County of Los Angeles (County) in adequately identifying, avoiding 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.

Response 2

This comment provides the project description and the project setting that are consistent with the information included in the IS. No additional response is necessary.

Comment 3

Comment #1: Impacts to Special-Status Plant Species

Issue: The Biological Constraints Analysis contains the results of rare plant surveys conducted by ESA in June 2016. Section 5.2 of the Biological Constraints Analysis specifies that during these surveys, "Two sensitive plant species were observed on the [P]roject site, as shown on Figure 8, Special-Status Plant Species Locations. These species include slender mariposa lily and Plummer's mariposa lily. The distinctive dried seed pods of both species were observed in various locations throughout the [P]roject site." The locations of these sensitive plant species are within the impact boundaries of the Project.

Specific impact: Both the slender mariposa lily (*Calochortus clavatus* var. *gracilis*) and Plummer's mariposa lily (*Calochortus plummerae*) are listed by California Native Plant Society (CNPS) as having a rarity ranking of 1B.2, which is considered a locally rare plant species that warrants mitigation. CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive species.

Why impact would occur: Project implementation includes grading, vegetation clearing for, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species.

Evidence impact would be significant: Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Response 3

The CDFW comment summarizes accurately the results of the 2016 focused sensitive plant surveys conducted and only two special-status plant species were observed, one of which is within the project development area. It should be noted that Plummer’s mariposa lily, observed outside the project development envelope, is CRPR 4.2 and not CRPR 1B.2, as indicated above. The County concurs with the assessment that the impact to slender mariposa lily by project grading is potentially significant without mitigation. As indicated below, the IS includes Mitigation Measure BIO-1 to reduce impacts to slender mariposa lily to a less than significant level, consistent with the comment.

Comment 4

Mitigation Measure #1: CDFW recommends conducting focused surveys for sensitive/rare plants on-site and disclosing the results in the final environmental document. Based on the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 2018), a qualified biologist should “conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting.” The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project related direct and indirect impacts.

Response 4

Focused surveys for sensitive plant species have already been conducted in June 2016. The results of these focused surveys are summarized on page 25 of the IS and the BCA. As stated in Comment 3 above, only slender mariposa lily and Plummer’s mariposa lily were observed during the focused surveys. This topic is thoroughly discussed within the IS (Page 24) and the BCA (Page 25), for which Mitigation Measure BIO-1 is recommended.

Comment 5

Mitigation Measure #2: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. To determine the rarity ranking of vegetation communities on

the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

Response 5

As stated in both the IS (Page 29-30) and the BCA (Pages 17-24), the information regarding plant communities follows the Manual of California Vegetation as the comment references. The discussion regarding sensitive plant communities and rarity ranking is provided in the BCA (Page 26) with the conclusion that one sensitive plant community, Thicketleaf Yerba Santa Scrub/Red Brome Semi-natural Stands, occurs on the project site and also within the development envelope, as states in the IS (Page 30) and the BCA (Pages 26 and 48). As a consequence of the project development impacting a sensitive plant community, Mitigation Measure BIO-9 is recommended to reduce project impacts to a less than significant level.

Comment 6

Mitigation Measure #3: CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S-3 ranked communities and 7:1 for S-2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should 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).

Response 6

As indicated in Response to Comment 5, Mitigation Measure BIO-9 is recommended for impacts to Thicketleaf Yerba Santa Scrub/Red Brome Semi-natural Stands sensitive plant community. As the comment recommends, Mitigation Measure BIO-9 requires the preparation of a habitat mitigation and monitoring plan by a qualified biologist and to be approved by the County Biologist prior to the issuance of a grading permit. As the comment recommends, the plan is to include restoration goals, performance standards, site maintenance, monitoring and adaptive management measures should the performance standards not be achieved. A mitigation ratio of 1:1 is recommended in part because the natural community is already disturbed with a dominant component of non-native species, primarily red brome (*Bromus madritensis ssp. rubens*) and this natural community is a transitional community, as defined in the description of Thicketleaf Yerba Santa Scrub, "Plants probably have a similar ecology to that of *Eriodictyon californicum*, whereby seeds collect near plants and form a seed bank; they germinate following disturbance such as fire, and plants die after 20 to 30 years" and "These stands appear after fires that occurred within 20 years ago," (<http://vegetation.cnps.org/alliance/201>). As Lead Agency, the County is the appropriate agency to review and approve the require habitat mitigation and monitoring plan.

Comment 7

Comment #2: Impacts to coast horned lizard (*Phrynosoma coronatum*), California legless lizard (*Anniella pulchra*), and coastal whiptail (*Aspidoscelis tigris stejnegeri*)

Issue: Based on the presence of suitable habitat on the Project site, as indicated in the Biological Constraints Analysis (ESA 2016), multiple Species of Special Concern (SSC) including coast horned lizard (*Phrynosoma coronatum*), California legless lizard (*Anniella pulchra*), and coastal whiptail (*Aspidoscelis tigris stejnegeri*), have moderate potential to occur and be impacted by Project activities.

Specific impacts: Ground clearing and construction activities could potentially lead to mortality of individual lizards found on the Project site.

Why impact would occur: These reptiles are cryptic species that often evade threats from predators by remaining still and blending into the surrounding landscape. Therefore, untrained workers may not recognize the presence of this species.

Evidence impact would be significant: Ground clearing and construction activities could lead to the direct mortality of a species of special concern. The loss of occupied habitat could yield a loss of foraging potential, basking sites, or egg-laying sites and would constitute a significant impact absent appropriate mitigation. CDFW considers impacts to SSC, including legless lizard, coastal whiptail, and coast horned lizard, a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures.

Response 7

The CDFW comment summarizes accurately the discussion regarding special-status wildlife species with the potential to occur on the project site based on presence suitable habitat. The County concurs with the assessment that the potential impact to coast horned lizard, California legless lizard, and coastal whiptail by project grading may be significant without mitigation. As indicated below, the IS includes Mitigation Measure BIO-2 to reduce impacts to special-status reptile species to a less than significant level, consistent with the comment.

Comment 8

Mitigation Measure #1: To mitigate impacts to SSC, CDFW recommends focused surveys for the species. Surveys should typically be scheduled when these animals are most likely to be encountered, usually conducted between June and July. To achieve 100 percent visual coverage, CDFW recommends surveys be conducted with parallel transects at approximately 20 feet apart and walked on-site in appropriate habitat suitable for each of these species. Suitable habitat consists of areas of sandy, loose and moist soils, typically under the sparse vegetation of scrub, chaparral, and within the duff of oak woodlands.

Response 8

As suggested by the comment, Mitigation Measure BIO-2 requires the preparation of a relocation plan that will include the need for focused surveys and within what the habitats the species are most likely to occur.

The County concurs with the CDFW comment that the special-status reptile species are most often found in areas of moist, loose sandy soil beneath sparse scrub vegetation.

Comment 9

Mitigation Measure #2: In consultation with qualified biologist familiar with the life history of each of the SSC, a relocation plan (Plan) should be developed. The Plan should include, but not be limited to, the timing and location of the surveys that will be conducted for this species, identify the locations where more intensive survey efforts will be conducted (based on high habitat suitability); identify the habitat and conditions in any proposed relocation site(s); the methods that will be utilized for trapping and relocating the individuals of this species; and the documentation/recordation of the number of animals relocated. CDFW recommends the Plan be submitted to the Lead Agency for approval 60 days prior to any ground disturbing activities within potentially occupied habitat.

Response 9

As above in Response 8, Mitigation Measure BIO-2 requires the preparation of a relocation plan by a qualified biologist and the plan will include the timing and location of the surveys that will be conducted for this species, identify the locations where more intensive survey efforts will be conducted (based on high habitat suitability); identify the habitat and conditions in any proposed relocation site(s); the methods that will be utilized for trapping and relocating the individuals of this species; and the documentation/recordation of the number of animals relocated. The plan will be submitted to the County for review and approval prior to any ground disturbing activities within potentially occupied habitat.

Comment 10

Mitigation Measure #3: The Plan should include specific survey and relocation efforts that occur during construction activities for the activity period of these reptiles (generally March to November) and for periods when the species may be present in the work area but difficult to detect due to weather conditions (generally December through February). Thirty days prior to construction activities in coastal scrub, chaparral, oak woodland, riparian habitats, or other areas supporting this species, qualified biologists should conduct surveys to capture and relocate individual reptiles to avoid or minimize take of these special-status species. The Plan should require a minimum of three surveys conducted during the time of year/day when these species most likely to be observed. Individuals should be relocated to nearby undisturbed areas with suitable habitat.

Response 10

The County concurs with the additional criteria to be included within the relocation plan, especially that relocation of any capture individuals be with nearby undisturbed areas with suitable habitat.

Comment 11

Mitigation Measure #4: If construction is to occur during the low activity period (generally December through February), surveys should be conducted prior to this period if possible. Exclusion fencing should be

placed to limit the potential for re-colonization of the site prior to construction. CDFW further recommends a qualified biologist be present during ground-disturbing activities immediately adjacent to or within habitat, which supports populations of this species.

Response 11

The County concurs with the recommendation for a qualified biologist to be present during ground-disturbing activities. This recommendation is included as Mitigation Measure BIO-8 of the IS (Page 29).

Comment 12

Comment #3: Impacts to nesting birds

Issue: The supporting document, Biological Constraints Analysis (November 2016) indicates that there is potential for occurrence for coastal California gnatcatcher (*Poliioptila californica californica*), a SSC, on the Project site due to the existence of critical habitat “located less than a mile south of the Project site south of Towsley Canyon Road.”

Specific impacts: Construction during the breeding season for nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment. The Project could also lead to the loss of foraging habitat for sensitive bird species.

Why impact would occur: Impacts to nesting birds could result from vegetation clearing and other ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable nesting and foraging habitats. Construction during the breeding season for nesting birds could result in the incidental loss of reproductive success or otherwise lead to nest abandonment.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code sections 3503 and 3503.5. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures.

Response 12

Coastal California gnatcatcher, a Species of Special Concern (SSC), has not been observed on the project site during biological surveys and nesting opportunities for this species is not expected because suitable nesting habitat is not present (BCA, Page 26). In addition, the closest record for this species in the California Natural Diversity Database (CNDDB) is approximately seven miles northeast of the project site in San Francisquito Canyon, in spite of critical habitat for this species being designated located less than a mile south of the Project site. A significant impact to this SSC is, therefore, not anticipated.

This CDFW comment summarizes accurately the discussion regarding avian species with the potential to nest on the project site. The County concurs that project grading may cause a potentially significant impact to nesting birds without compliance with the Migratory Bird Treaty Act (MBTA) and Fish and Game Code regulations. As indicated below, the IS includes Mitigation Measure BIO-11 to avoid or minimize impacts to nesting bird species to a less than significant level, consistent with the comment.

Comment 13

Mitigation Measure #1: To protect nesting birds that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction during this period must occur, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, they shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction.

Response 13

The County concurs with this comment to protect birds that may nest on the project site. Mitigation Measure BIO-11 (IS Page 34) is recommended specifically to demonstrate how the project will be in compliance with the MBTA and Fish and Game Code regulations by conducting pre-construction nest surveys. Surveys up to 500 feet (for raptors/birds of prey) of the construction footprint will be required to satisfy this mitigation measure.

Comment 14

Comment #4: Impacts to Streams

Issue: CDFW is concerned that the Project location supports streams subject to notification under Fish and Game Code section 1600 et seq. Based on the location of the Project site (at the bottom of multiple canyons) and a review of satellite imagery, the Project is likely to require a Lake or Streambed Alteration (LSA) Notification for grading and construction activities. Page 31 of the Draft Initial Study indicates that there are riparian resources found onsite and may be impacted. "The jurisdictional area is conservatively estimated to be 1.1 acres of CDFW "waters of the State." A significant portion of the northern parcels of the Project site will be graded. "Project construction will impact 0.54 acre of CDFW "waters of the State". The impacts to streambeds may be underestimated as it does not account for the diminishment of onsite hydrology.

Issue: A formal jurisdictional delineation has not been completed for the site. The materials that were provided for review were based on an informal hydrological evaluation for the site.

Specific impacts: The Project may result in the loss of streams and associated watershed function and biological diversity. Grading and construction activities will likely alter the topography, and thus the hydrology, of the project site.

Why impacts would occur: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream streams and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project.

Response 14

This CDFW comment summarizes accurately the discussion jurisdictional resources on the project site. Avoidance of these jurisdictional features by project grading is not possible because of the project site topography. Changes to the project site hydrology are mandated by the County's drainage concept requirements that are incorporated into the project tract map design. The County concurs that project grading will alter the project site stream causing a potentially significant impact to Fish and Game Code jurisdictional resources. As indicated below, the IS includes Mitigation Measure BIO-10 to mitigate impacts to regulated jurisdictional resources by restoration or enhancement of jurisdictional "waters of the State."

Comment 15

Mitigation Measure #1: CDFW has concluded that the Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at www.wildlife.ca.gov/habcon/1600,

CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. However, the MND does not meet CDFW's standard at this time. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Response 15

The County agrees that a Lake and Streambed Alteration Agreement (LSA) issued by CDFW is required subsequent to project approval but prior to ground disturbance. This is described in the IS as Mitigation Measure BIO-10 (Page 32) and in the BCA (page 47). Project site potential jurisdictional features are depicted in Figure 3 of the BCA (Page 9). The CDFW comment indicates that identification of the potential impacts to the stream or riparian resources and provision of adequate avoidance, mitigation, monitoring and reporting

commitments are required prior to issuance of the LSA. The County agrees that this information is appropriately included as part of a project proponent notification package submittal to CDFW.

Comment 16

Mitigation Measure #2: Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration and/or protection and management of mitigation lands in perpetuity.

Response 16

The County agrees that the CDFW may require protective measures in any LSA permit approved for this project. Erosion and pollution control measures are anticipated and these measures are typically included into the project Low Impact Development (LID) requirements that the County Department of Public Works incorporates into their tract map design review and approval, summary of which is described on Pages 57-59 of the IS.

Comment 17

Comment #5: Wildlife Crossing and Use of Site

Issue: Project related activities may impact wildlife movement and usage of the site through loss of suitable habitat, refuge, and permeable landscape. The Project site sits in the Santa Monica-Sierra Madre Habitat Linkage, as identified in Figure 10 of the Biological Constraints Analysis, which is essential for regional movement of wildlife in a north/south fashion.

Specific impact: The Project has the potential to impact wildlife usage of the vital Santa Monica-Sierra Madre Habitat Linkage that faces a significant threat by the I-5 corridor, located about a mile east of the Project site. The South Coast Wildlands Missing Linkages Report (Penrod 2006) identified the Project area and adjacent crossings in their linkage design analysis for the Sierra Madre-Castaic Connection and considers this area highly suitable for regional wildlife movement and connectivity including mountain lion (*Puma concolor*), American badger (*Taxidea taxus*), mule deer (*Odocoileus hemionus*).

Why impacts would occur: The removal of suitable habitat along with the introduction of physical barriers to movement, such as roads or housing, can impede the movement of wildlife species in this peri-urban fringe.

Evidence impact is significant: Aspects of the Project could create physical barriers to wildlife movement from direct or indirect Project-related activities. Impacts from increased traffic, lighting, noise, dust, and increased human activity may interfere with wildlife movement.

Response 17

The IS (Pages 32-34) and BCA (Pages 27-32) describe wildlife movement in general and more specifically in relation to the project site (BCA Pages 33-34). The northern portion of the project site is surrounded by urban development, with residential land uses existing to west, north and east, providing wildlife movement on a larger, "regional" scale to likely occur to and from the project site in the southern portion, where the surrounding area is undeveloped within the Santa Susana Mountains, which ultimately connect the Simi Hills on the southwest with the San Gabriel Mountains to the east. For wildlife, movement on the project site is a "dead end" in the north because there are no large habitat blocks available. The project design is clustered adjacent to existing development (e.g., Pico Canyon Road to the north and nearby residences to the west) and would minimize impacts to the southern portion of the study area. The prominent northwest-southeast trending ridgeline demarcating the proposed developed area from the proposed open space portion of the project site is an appropriate physical feature discouraging wildlife movement north where limited resources are present.

It is acknowledged that the Santa Clarita Woodlands Park is a large block of wildlife habitat south of the project site. The Santa Clarita Woodlands Park is a 4,000-acre public parkland that is a critical component of a cross-mountain range wildlife habitat corridor that links the Santa Monica Mountains to the Angeles and Los Padres National Forests. This chain of conserved open space parcels lying to the south of the project site provide a linkage within the Santa Susana Mountains northwest through the Newhall Ranch Specific Plan open space areas. The effects of the clustered project design at this location would not cause a barrier to movement but could cause minor interference of existing on-site local movement patterns.

The Santa Monica-Sierra Madre Habitat Linkage incorporates the Santa Clarita Woodlands Park and other open space areas within the Santa Susana Mountains, including the Newhall Ranch open space, located both south and west of the project site, as providing continuous habitat fostering the potential regional movement of wildlife between the San Gabriel Mountains to the east, the Santa Monica Mountains to the southwest and the Sierra Madre Range to the northwest of the project site. The proposed project design clusters the residential uses to the northern portion of the site, leaving the southern portion, contiguous with the Santa Clarita Woodlands Park, as open space and without interference of existing wildlife movement in this area.

The clustered project design adjacent to existing residential development and away from open space areas immediately south of these residential areas, wildlife movement through the study area after project implementation would be expected to accommodate east-west movement but potentially constrain north-south movement. The clustered project design is not expected to substantially alter movement through the study area especially in the southern portion of the project site. The effect of the project on movement of any native resident or migratory fish or wildlife species would be less than significant impact and no mitigation is needed or proposed.

Comment 18

Mitigation Measure #1: CDFW recommends the resulting environmental document include studies that track wildlife dispersal, including that for large mammals, across the Project site and across the three under-crossings discussed above, and discuss how the Project will affect the use and dispersal patterns. The environmental document should include maps showing local and regional wildlife movement patterns and analyze how the Project will affect these corridors. The DIS asserts the Project will not have a significant effect on wildlife movement. CDFW requests the environmental document include data and maps to support these conclusions.

As a general rule, CDFW recommends reducing or clustering the development footprint to reduce the total area impacted and providing a larger buffer between housing, maintaining wildlife access to regional under-crossings, and allowing access to perennial water sources.

Response 18

As stated in CDFW Comment 17, the BCA Figure 10 (Page 30) depicts the project site at the periphery of the Santa Monica-Sierra Madre Habitat Linkage. Both the BCA (Pages 27-34) and the IS (Pages 32-34) provide an analysis of the environmental effects of the project on wildlife movement and concludes that the project impact on native resident or migratory fish or wildlife species movement would be less than significant.

Consistent with the CDFW recommendation for clustering development to reduce total impact area, the proposed project design is clustered adjacent to existing residential development and away from open space areas immediately south of these residential areas, such that wildlife movement through the study area after project implementation would be expected to accommodate east-west regional movement but potentially constrain local north-south movement.

State CEQA Guidelines Section 15151 requires an evaluation of the environmental effects of a proposed project to be sufficient to provide decision makers with information that enables them to make an intelligent decision and that the analysis need not be exhaustive. The IS combined with the BCA provides such an analysis for the County decision makers to make an informed decision regarding project impacts to wildlife movement.

Comment 19

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

Response 19

The County concurs that the project would have a less than significant impact on fish and wildlife with implementation of recommended mitigation measures and that payment of the necessary filing fees will become a condition of approval, should the project be granted approval by the Regional Planning Commission.