



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 82123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Aug 12 2020

STATE CLEARINGHOUSE

August 12, 2020

Susan Courtney
Glendale Community College District
1500 N Verdugo Road
Glendale, CA 91208
susan@glendale.edu

Subject: 2019 Facilities Master Plan Update to the 2015 Master Plan Notice of Preparation of a Draft Environmental Impact Report, SCH #2020070231, Los Angeles County

Dear Ms. Courtney:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced 2019 Facilities Master Plan Update to the 2015 Master Plan (Project). In addition, CDFW reviewed the Project's supporting documentation including the Initial Study, published July 2020. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW'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 & 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.*) authorization as provided by the applicable Fish and Game Code will be required.

Susan Courtney
Glendale Community College District
Page 2 of 9
August 12, 2020

Project Description and Summary

Objective: The Project is a long-range plan for the development of facilities to support Glendale Community College District's (GCCD) vision, mission, and goals. It recommends site and facilities improvements for three GCCD sites: the Verdugo Campus, the Garfield Campus, and the Professional Development Center (Montrose Campus). The 2015 GCCD Master Plan outlines capital improvements through 2025 and proposes construction of new buildings, renovation, modernization and additions to existing facilities, demolition of existing buildings, and landscaping enhancements.

An overview of the Project updates for the three campuses is provided as follows: Verdugo Campus: The GCCD 2019 Facilities Master Plan Verdugo Campus improvements would result in 228,853 square feet of renovation, 52,443 square feet of new construction, and 170,387 square feet of demolition. In addition, the Proposed Projects at the Verdugo Campus would add 650 parking spaces to the campus. Garfield Campus: The GCCD 2019 Facilities Master Plan Update Garfield Campus improvements would result in 43,090 square feet of renovation. Montrose Campus: The GCCD 2019 Facilities Master Plan Update Montrose Campus improvements would result in 21,559 square feet of renovation and 17,611 square feet of new construction. In addition, the Proposed Projects at the Montrose Campus would add up to approximately 100 parking spaces to the campus.

Location: The three GCCD campuses are located in the greater-Glendale community. All three campuses are near regional transportation routes including State Route 2, which connects to Interstate Highway 5 and 210 and State Route 134.

The Verdugo Campus is located at 1500 North Verdugo Road in the City of Glendale, California, 91208. The Verdugo Campus is built on the terraced hillside of the San Rafael Hills in Verdugo Canyon. The campus boundaries are defined to the east by State Route 2 Glendale Freeway, Mountain Avenue to the south, and Verdugo Road to the west.

The Garfield Campus is located at 1122 Garfield Avenue, Glendale, California 91205. The Garfield Campus is situated on a fairly level site within a dense, low-rise urban neighborhood consisting of mixed land uses. The boundaries of the Garfield campus are South Adams Street on the west, East Garfield Avenue on the north, and the boundaries of the parking lot to the east and south.

The Montrose Campus is located at 2340 Honolulu Avenue, Montrose, California 91020, in the town center of Montrose and in close proximity to the State Route 2 Glendale Freeway and Interstate Highway 210. The Montrose Campus is located among neighborhood shops and restaurants. The Montrose campus includes the building at 2340 Honolulu Avenue, also known as the Professional Development Center (PDC), as well as the parking lot behind the building.

Comments and Recommendations

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

Susan Courtney
Glendale Community College District
Page 3 of 9
August 12, 2020

Specific Comments

- 1) Nesting Birds. Section 2.6 Best Management Practices of the Initial Study states, “If tree removal is to occur between March 1 through July 30, a survey to identify active bird nests shall be conducted by a qualified biologist no more than two weeks before the start of construction. Removal of any mature trees with active bird nests will be delayed until a qualified biologist determines that the subject bird(s) are no longer nesting or until juveniles have fledged.” CDFW is concerned that not only are the dates presented excluding a portion of the nesting season, but avoidance measures are not prioritized as a primary mean of mitigation. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
 - a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - b) Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs.
 - c) If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area, 500-feet for raptors, and 0.5 a mile for special status species. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Changes (including reductions and increases) in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 2) Landscaping. Section 5.4.1 indicates that the, “Project will incorporate landscaping improvements.” Invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate, plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, including pepper trees (*Schinus* genus) and fountain grasses (*Pennisetum* genus), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>.
- 3) Tree Removal: Section 5.4.1 indicates that, “implementation of the Master Plan may require the removal of large trees.” Habitat loss is one of the leading causes of native

Susan Courtney
 Glendale Community College District
 Page 4 of 9
 August 12, 2020

biodiversity loss. To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees. CDFW recommends replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.

- a) Due to tree removal, Project activities have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species. To reduce impacts to less than significant the final environmental document should describe an infectious tree disease management plan and how it will be implemented in order to avoid significant impacts under CEQA. All trees identified for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: thousand canker fungus (*Geosmithia morbida*), see <http://www.thousandcankers.com/>; Polyphagous Shot Hole Borer (*Euwallacea spp.*), see <http://eskalenlab.ucr.edu/avocado.html>; and goldspotted oak borer (*Agrilus auroguttatus*), see <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.
- 4) Bat Species. A review of California Natural Diversity Database (CNDDB) indicates occurrences of several bat species within the Project vicinity. These species include, western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), and silver-haired bat (*Lasionycteris noctivagans*). The yellow, mastiff, and free-tailed bat species are all designated California Species of Special Concern. The Initial Study fails to mention any bat species that may be within any of the Project sites or within the Project vicinity. Despite the high diversity and sensitivity of bats in Southern California, numerous bat species are known to roost in trees and structures throughout Los Angeles County. Project activities may have the potential to adversely impact bat populations within the vicinity.

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish and Game Code, § 4150, California Code of Regulations, § 251.1). A Draft Environmental Impact Report (DEIR) should provide a thorough discussion of potential impacts to bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures. The DEIR should describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines, §15126.4[a][1]).

- 5) Biological Baseline Assessment. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts, as referred in General Comment 1 (See below) CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct

Susan Courtney
Glendale Community College District
Page 5 of 9
August 12, 2020

and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's CNDDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;
- e) A review of the CNDDDB indicates a record of the Plummer's mariposa lily (*Calochortus plummerae*), a species of limited or infrequent distribution throughout the state, within a half mile south of the Verdugo Campus. The DEIR should include a complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable,

Susan Courtney
Glendale Community College District
Page 6 of 9
August 12, 2020

are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,

- f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

General Comments

- 1) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DEIR:
 - g) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - h) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species and identification of any mitigation measures;
 - i) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. After review of the Natural Communities Commonly Associated with Groundwater (NCCAG) Dataset (USDAFS, 2014), this hydrology impact discussion is especially important due to the identification of Coast Live Oak as a groundwater dependent ecosystem downstream from the Project site. Coast Live Oak woodlands are a sensitive vegetative community and may be adversely impacted by changes to hydrology. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
 - j) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
 - k) A cumulative effects analysis, as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects,

Susan Courtney
Glendale Community College District
Page 7 of 9
August 12, 2020

should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

- 2) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 3) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or State-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 4) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 5) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status

Susan Courtney
Glendale Community College District
Page 8 of 9
August 12, 2020

species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

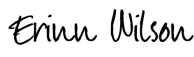
Filing Fees

The Project, as proposed, could 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).

Conclusion

We appreciate the opportunity to comment on the Project to assist GCCD in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that GCCD has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 430-0098.

Sincerely,

DocuSigned by:

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Erinn Wilson
Environmental Program Manager I

ec: CDFW

Victoria Tang – Los Alamitos
Felicia Silva – Los Alamitos
Baron Barrera – Los Alamitos
Susan Howell – San Diego
CEQA Program Coordinator – Sacramento

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Susan Courtney
Glendale Community College District
Page 9 of 9
August 12, 2020

References:

Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed.
ISBN 978-0-943460-49-9.