



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 26, 2021

Governor's Office of Planning & Research

Mar 01 2021

STATE CLEARINGHOUSE

Susan Courtey
 Glendale Community College District
 1500 N Verdugo Road
 Glendale, CA 91208
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Subject: Comments on the 2019 Facilities Master Plan Update to the 2015 Master Plan Draft Environmental Impact Report, SCH #2020070231, Glendale Community College District, Los Angeles County

Dear Ms. Courtey:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) from the Glendale Community College District (GCCD; Lead Agency) for the 2019 Facilities Master Plan Update to the 2015 Master Plan (Project) and supporting documentation, *Biological Resources Reconnaissance Assessment for the Glendale Community College District 2019 Glendale Community College District Facilities Master Plan Update* (BRR), dated October 23, 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 & G. 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 & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, §

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2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Project Description and Summary

Objective: The objective of the Project is to provide a long-range plan for the development of facilities to support GCCD's vision, mission, and goals. The Project proposes 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. Improvements are intended to update existing technological and program services to meet increasing needs of students and faculty. The 2019 Facilities Master Plan Update plans for expansion of instructional space, acquiring land to expand the Garfield Campus, expansion of the Montrose Campus, and various other campus upgrades in addition to what was included in the 2015 GCCD Master Plan. The Project includes projects listed in both the 2015 Facilities Master Plan and the 2019 Facilities Master Plan Update that are not currently underway or have not already been analyzed.

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.

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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, as well as the parking lot behind the building.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the GCCD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

Comment #1: Impacts to Crotch's Bumble Bee

Issue: CDFW is concerned that suitable habitat for Crotch's bumble bee (*Bombus crotchii*) may be present at the Verdugo Campus. Therefore, the Project could impact Crotch's bumble bee.

Specific Impact: Project ground disturbing activities for new building construction may result in crushing or filling of active bee colonies, causing the death or injury of adults, eggs, and larvae. Crotch bumble bee inhabits open grassland and scrub habitats. According to the BRR, coastal sage scrub habitat is located directly adjacent to the Verdugo campus. The Project may impact bee habitat by disturbing vegetation that may support essential foraging habitat. In addition, the Project biological survey took place on September 1, 2020, which is at the very end of flying season, making detection less likely.

Why Impact would occur: According to Figure 2-11 of the DEIR, construction of a district storage facility will take place directly adjacent to coastal sage scrub habitat. In addition, the science building will be constructed, and the aviation/art building will be renovated in the vicinity of the coastal sage scrub habitat, which contains species often associated with Crotch bumble bee, such as California sagebrush and brittlebush (Hatfield et al. 2018). Crotch's bumble bee primarily nest in late February through late October and may be difficult to detect with one general biological survey conducted near the end of flying season. They nest underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, underbrush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Without species focused level surveys, Crotch bumble bee has the possibility to be missed. Project disturbance activities, including building construction or renovation, could result in mortality or injury to hibernating bees, as well as temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of bees could result in the incidental loss of breeding success or otherwise lead to nest abandonment. In addition, survey efforts that take place outside of flying season when bees are most likely to be detected may lead to false negative results. This may also lead to insufficient mitigation measures to protect bees or colonies that may be found on site.

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Evidence Impact would be significant: 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). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by GCCD (CEQA Guidelines, § 15065). The Project has potential to substantially reduce or adversely modify habitat, impair the viability of populations, and reduce the number and range of the Crotch's bumble bee.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: Due to suitable habitat within the Project site, within one year prior to grading and/or vegetation removal, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, should be submitted to GCCD prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. At minimum, a survey report should provide the following:

- a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee;
- b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched;
- c) Map(s) showing the location of nests/colonies; and,
- d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

Mitigation Measure #2: If Crotch's bumble bee is detected, GCCD in consultation with a qualified entomologist should develop a plan to fully avoid impacts to Crotch's bumble bee. The plan should include effective, specific, enforceable, and feasible measures. An avoidance plan should be submitted to GCCD prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.

Mitigation Measure #3: If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, GCCD/qualified entomologist should coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. CDFW recommends GCCD mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.

Comment #2: Impacts to Bat Species, including California Species of Special Concern

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Issue: The Project includes activities that will result in the removal of trees and vegetation that may provide foraging and roosting habitat for bats. In addition, the BRR concludes the western mastiff bat (*Eumops perotis californicus*) and western yellow bat (*Lasiurus xanthinus*), both designated California Species of Special Concern, are absent on site. CDFW is concerned that neither the DEIR nor BRR provided information as to what criteria was used to conclude that suitable habitat is not present.

Specific impacts: Project activities include the removal of trees, vegetation, and/or structures that may provide foraging or roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, excavating, and grading), and vibrations caused by heavy equipment.

Why impacts would occur: The removal of vegetation and trees and demolition of existing structures may potentially result in the loss of foraging and roosting habitat for bats. Construction activities will temporarily increase the disturbance levels as well as human activity in the Project area. The BRR mentions several mature trees are on site but concluded there is no high-quality habitat. Bats do not only nest in trees but are often found in buildings in urban areas. A general biological reconnaissance survey conducted from 0800 to 1200 hours would not determine the presence/absence of bats, which require more species-specific and specific time-of-day surveys. Development activities may impact any bat species that could be within the Project boundary or its vicinity.

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). There are many bat species that can be found year-round in urban areas throughout the south coast region of California (Miner & Stokes, 2005). Several bat species are considered California Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by GCCD (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to GCCD. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to GCCD prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

Mitigation Measure #2: If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree

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removal, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

Mitigation Measure #3: If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

Mitigation Measure #4: If maternity roosts are found and GCCD determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before sunset and 30 minutes after sunrise.

Additional Recommendations

Recommendation #1: Vegetation Communities

The BRR states “Although there is potential for special status species to occur within the Survey Area, only one of the proposed Project Sites, the proposed District Storage Facility, would involve construction activities occurring adjacent to Disturbed Coastal Sage Scrub habitat. No work at the proposed District Storage Facility or the other proposed construction sites is expected to enter the Disturbed Coastal Sage Scrub or Coastal Sage Scrub areas identified during the survey.” CDFW concurs and recommends no project construction, activities, and equipment staging should occur within these vegetation communities. No work, including operation of loaders, dozers, other construction equipment, and vehicles, should occur within 50 feet from the vegetation to minimize impacts to plant and wildlife species that may occupy the habitat. Vehicles and workers should not be allowed to enter this area. CDFW recommends fencing and signage should be installed 50 feet from the vegetation community to exclude entry into the area for the duration of the project. Fencing and signage should not be moved and be maintained for the duration of the project. GCCD should advise all workers of the intent of the protection measures prior to the start of project construction and activities. CDFW recommends GCCD establish appropriate setbacks from the vegetation and demarcate the staging area. A setback should provide a buffer between the vegetation and staging area so that accidental spillage of pesticides, oil, gasoline, and other liquids within the staging area would not pass into the coastal sage scrub habitat. All staging should be within the designated staging area only.

Recommendation #2: Nesting Birds

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The Project's Mitigation Measure MM-BIO-1, as it is currently proposed, does not include an accurate breeding and nesting season of raptors even though the Project site supports multiple raptor species. Primarily, CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying Mitigation Measure MM-BIO-1 by expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through August 31. If the Project occurs between January 1 through August 31, a nesting bird and raptor survey should be conducted prior to any ground-disturbing activities (e.g., staging, mobilization, excavation, grading) as well as prior to any vegetation removal within the Project site.

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW should be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Recommendation #3: Vegetation Communities

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](#) (Sawyer 2008). 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.

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 & G. 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. Please consider incorporating the attached Biological Mitigation Measure and Recommendation Table into a future environmental document for the Project. 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.

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Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

cc: CDFW

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CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
MM-BIO-1-Crotch's bumble bee	<p>Due to suitable habitat within the Project site, within one year prior to grading and/or vegetation removal, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, shall be submitted to GCCD prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. At minimum, a survey report shall provide the following:</p> <ul style="list-style-type: none"> a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee; b) Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched; c) Map(s) showing the location of nests/colonies; and, d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) 	Prior to Construction	Glendale Community College District

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	<p>conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).</p>		
MM-BIO-2-Crotch's bumble bee	<p>If Crotch's bumble bee is detected, GCCD in consultation with a qualified entomologist shall develop a plan to fully avoid impacts to Crotch's bumble bee. The plan shall include effective, specific, enforceable, and feasible measures. An avoidance plan shall be submitted to GCCD prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.</p>	Prior to Construction	Glendale Community College District
MM-BIO-3-Crotch's bumble bee	<p>If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, GCCD/qualified entomologist shall coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. GCCD shall mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.</p>	Prior to Construction	Glendale Community College District
MM-BIO-4-Bat Species	<p>Prior to construction activities, a qualified bat specialist shall conduct bat surveys on site (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bat species to minimize impacts to sensitive bat species. A</p>	Prior to Construction	Glendale Community College District

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	discussion of survey results, including negative findings shall be provided to GCCD. Depending on the survey results, a qualified bat specialist will discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to GCCD prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.		
MM-BIO-5-Bat Species	If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.	Prior to Construction	Glendale Community College District
MM-BIO-6-Bat Species	If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).	Prior to Construction	Glendale Community College District

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MM-BIO-7-Bat Species	If maternity roosts are found and GCCD determines that impacts are unavoidable, a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology shall be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost. Work shall also not occur between 30 minutes before sunset and 30 minutes after sunrise.	Prior to Construction	Glendale Community College District
Recommendations			
Recommendation-1	The BRR states “Although there is potential for special status species to occur within the Survey Area, only one of the proposed Project Sites, the proposed District Storage Facility, would involve construction activities occurring adjacent to Disturbed Coastal Sage Scrub habitat. No work at the proposed District Storage Facility or the other proposed construction sites is expected to enter the Disturbed Coastal Sage Scrub or Coastal Sage Scrub areas identified during the survey.” CDFW concurs and recommends no project construction, activities, and equipment staging shall occur within these vegetation communities. No work, including operation of loaders, dozers, other construction equipment, and vehicles, shall occur within 50 feet from the vegetation to minimize impacts to plant and wildlife species that may occupy the habitat.	Prior to Construction	Glendale Community College District

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	<p>Vehicles and workers shall not be allowed to enter this area. CDFW recommends fencing and signage shall be installed 50 feet from the vegetation community to exclude entry into the area for the duration of the project. Fencing and signage shall not be moved and be maintained for the duration of the project. GCCD shall advise all workers of the intent of the protection measures prior to the start of project construction and activities. CDFW recommends GCCD establish appropriate setbacks from the vegetation and demarcate the staging area. A setback should provide a buffer between the vegetation and staging area so that accidental spillage of pesticides, oil, gasoline, and other liquids within the staging area would not pass into the coastal sage scrub habitat. All staging should be within the designated staging area only.</p>		
<p>Recommendation-2</p>	<p>The Project's Mitigation Measure MM-BIO-1, as it is currently proposed, does not include an accurate breeding and nesting season of raptors even though the Project site supports multiple raptor species. Primarily, CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying Mitigation Measure MM-BIO-1 by expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through August 31. If the Project occurs between January 1 through August 31, a nesting bird and raptor survey should be conducted prior to any ground-disturbing activities (e.g., staging, mobilization, excavation, grading) as well as prior to any vegetation removal within the Project site.</p> <p>It shall be noted that the temporary halt of Project activities within nesting buffers during nesting season</p>	<p>Prior to Construction</p>	<p>Glendale Community College District</p>

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	<p>does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.</p>		
<p>Recommendation-3</p>	<p>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 (Sawyer 2008). 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.</p>	<p>Prior to Construction</p>	<p>Glendale Community College District</p>