



STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

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September 14, 2023

Governor's Office of Planning & Research

Michael Sin
200 N Spring St, Room 667
Los Angeles, CA 90012
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Sep 14 2023

STATE CLEARINGHOUSE

Subject: Draft Environmental Impact Report for Cornfield Arroyo Seco Specific Plan Update, SCH #2021040206, City of Los Angeles, Los Angeles County

Dear Michael Sin:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (CASP) Update (Project) proposed by the City of Los Angeles (City). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's 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; Pub. 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 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

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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, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.). CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

General Site Description: The Project Area is approximately 600 acres (0.93 square miles) and is located within the original floodplains of the Los Angeles River and Arroyo Seco water bodies, which are part of the lower Los Angeles River Watershed. The Project Area is predominantly developed, with transportation infrastructure being a central feature of the Project Area. Interstate 5 (I-5) and State Route-110 (SR-110) bisect the northern portion of the Project Area. Entrances and exits to and from SR-110 are located on the northern perimeter of the Project Area. The Los Angeles County Metropolitan Authority (LA Metro) L Line (Gold) cuts across the northern portion of the Project Area and provides frequent access to downtown Los Angeles, northeastern sections of Los Angeles, and the cities of South Pasadena and Pasadena.

Location: The Project Area is located entirely within Los Angeles City Council District One, and is generally bordered by Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north.

Objective: The Proposed Project is an update of the existing CASP. The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would strengthen the existing CASP's affordable housing requirements, including the recalibration of the CASP's existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City's new modular Zoning Code. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

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Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the City consider our comments and recommendations when preparing an environmental document that may provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

Specific Comments

Comment #1: Impacts on Burrowing Owls (*Athene cunicularia*)

Issue: The Project may impact over-wintering burrowing owls, which is designated as a California Species of Special Concern (SSC).

Specific impacts: Project ground-disturbing activities such as vegetation removal will result in habitat destruction and may lead to death or injury of individuals. Project construction and activities may also disrupt foraging behavior.

Why impacts would occur: The DEIR acknowledges that burrowing owl have "been known to nest in manmade objects such as pipes and riprap" (page 4.3-25) and have a low potential to occur in the Project area. The DEIR proposes mitigation measure 4.3-2 on page 4.3-27 to perform a pre-construction survey and "All project applicants will be notified of and shall include on their plans an acknowledgement of the requirement to comply with the federal MBTA [Migratory Bird Treaty Act] and CFGC [California Fish and Game Code] [...]" prior to Project activities. The mitigation measures, as presented, may not reduce impacts to a level less than significant if burrowing owls are detected. The measure proposes a general pre-construction survey. According to CDFW's Staff Report on Burrowing Owl Mitigation, burrowing owls require specific time of year surveys (CDFW 2012). Moreover, the DEIR does not discuss mitigation for potential loss of habitat. If the Project removes this habitat for burrowing owls, then regional cumulative impacts to burrowing owl habitat would occur. The DEIR should incorporate a mitigation measure that outlines replacement of burrowing owl habitat.

Evidence impacts would be significant: A SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

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1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under Endangered Species Act (ESA)-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA-threatened or -endangered status (CDFW 2023a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status 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 by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If ground-disturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing ground-disturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st

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through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.

Mitigation Measure #2: Compensatory Mitigation – If the Project will impact habitat supporting burrowing owls, the Project applicant shall offset impacts on habitat supporting this species at no less than a 3:1 mitigation ratio. The Project Applicant shall set aside replacement habitat either on site or off site at a mitigation ratio approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.

Comment #2: Impacts to Bat Species

Issue: The Project may impact several bat species, including western mastiff bat (*Eumops perotis californicus*) and big free-tailed bat (*Nyctinomops macrotis*), that are listed as SSC.

Specific impacts: The DEIR identifies western mastiff bat and big free-tailed bat in records of the California Natural Diversity Database (CNDDDB) on page 4.3-2. Project activities include ground disturbing activities that may disturb areas that may provide foraging 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, and grading), and vibrations caused by heavy equipment.

Why impacts would occur: The removal of vegetation may potentially result in the loss or disturbance of foraging and roosting habitat for bats. Construction activities will temporarily increase the disturbance levels as well as human activity in the Project area. Moreover, a general preconstruction biological reconnaissance survey conducted during daytime hours have potential for bats present on site to be undetected. This may cause the Project to impact individuals not previously known to reside in or around the Project area. Bats would require more species-specific and specific time-of-day surveys.

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). Several bat

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species are considered SSC 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 the City (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #3: Prior to construction activities, a qualified bat specialist shall conduct bat surveys within project 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. Acoustic recognition technology shall be used to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be included in the final EIR. The final EIR shall also 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 prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

Mitigation Measure #4: If maternity roosts are found 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).

Additional Recommendations

Recommendation #1 – Biological Assessment: CDFW recommends modifying Mitigation Measure 4.3-1 on page 4.3-27 of the MND to include underlined language and remove language with strikethrough.

“For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include:

An adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact

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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. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. A biological resource assessment 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. 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, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2023b);
- 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 Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation Online](#) should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project could lead to direct or indirect impacts off site. 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 a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. a review of the California Natural Diversity Database

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~~(CNDDDB) and iNaturalist maps to~~ This search may determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or bat species. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur on the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

- e) 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 a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2023c). Acceptable species-specific survey procedures may 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 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of a 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."

Recommendation #2 – Scientific Collecting Permits: CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW

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2023d). Pursuant to the California Code of Regulations, title 14, section 650, the qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.

Recommendation #3 – Updating the California Natural Diversity Database:

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2023e). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023f).

Recommendation #4 – Rodenticides: Rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project.

Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist the City of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:

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Jennifer Turner, acting for:
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Environmental Program Manager
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References:

- [CDFW] California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- [CDFW] California Department of Fish and Wildlife. 2023a Species of Special Concern. Available from: <https://wildlife.ca.gov/Conservation/SSC>
- [CDFW] California Department of Fish and Wildlife. 2023b. Natural Communities. Available at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>
- [CDFW] California Department of Fish and Wildlife. 2023c. Survey and Monitoring Protocols and Guidelines. Available at: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFW] California Department of Fish and Wildlife. 2023d. Scientific Collecting Permit. Available from: <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>
- [CDFW] California Department of Fish and Wildlife. 2023e. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.
- [CDFW] California Department of Fish and Wildlife. 2023f. Combined Rapid Assessment and Releve Form. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into the Project's environmental document.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- Burrowing Owl	<p>Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the City shall perform a preconstruction survey of the Project area for burrowing owls no further than 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If ground-disturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing ground-disturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) and a non-disturbance buffer shall be</p>	<p>Prior to issuance of development permit</p>	<p>City of Los Angeles (City)/Project Applicant</p>

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	demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.		
MM-BIO-2-Burrowing Owl	If the Project will impact habitat supporting burrowing owls, the Project applicant shall offset impacts on habitat supporting this species at no less than a 3:1 mitigation ratio. The Project Applicant shall set aside replacement habitat either onsite or offsite at a mitigation ratio approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which shall include an appropriate endowment to provide for the long-term management of mitigation lands.	Prior to issuance of development permit	City/Project Applicant
MM-BIO-3-Bats	Prior to construction activities, a qualified bat specialist shall conduct bat surveys within project 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. Acoustic recognition technology shall be used to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be included in the final EIR. The final EIR shall also 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 prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.	Prior to issuance of development permit	City/Project Applicant
MM-BIO-4-Bats	If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but	Prior to issuance of	City/Project Applicant

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	are yet ready to fly out of the roost (March 1 to September 30).	development permit	
REC-1- Biological Assessment	<p>CDFW recommends modifying Mitigation Measure 4.3-1 on page 4.3-27 of the MND to include <u>underlined</u> language and remove language with strikethrough.</p> <p>“For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include:</p> <p><u>An adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place 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. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. A biological resource assessment should include the following information:</u></p> <p>a) <u>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</u></p>	Prior to issuance of development permit	City/Project Applicant

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	<p><u>include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. 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, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities webpage (CDFW 2023b);</u></p> <p>b) <u>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 Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;</u></p> <p>c) <u>Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The Manual of California Vegetation Online should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;</u></p> <p>d) <u>A complete, recent, assessment of the biological resources associated with each habitat type on site</u></p>		
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	<p><u>and within adjacent areas that could also be affected by a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. a review of the California Natural Diversity Database (CNDDDB) and iNaturalist maps to This search may determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or bat species. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur on the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];</u></p> <p>e) <u>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 a project site should also be addressed such as</u></p>		
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	<p>wintering, roosting, nesting, and foraging habitat. <u>Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines for established survey protocol for select species (CDFW 2023c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and,</u></p> <p>f) <u>A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of a 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."</u></p>		
<p>MM-BIO-2- Scientific Collecting Permits</p>	<p>CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2023d). Pursuant to the California Code of Regulations, title 14, section 650, the qualified biologist must obtain appropriate handling permits to capture, temporarily</p>	<p>Prior to Project ground disturbing activities</p>	<p>City/Project Applicant</p>

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	possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.		
MM-BIO-3-CNDDB	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDB by completing and submitting CNDDB Field Survey Forms (CDFW 2023e). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023f).	Prior to Project ground disturbing activities	City/Project Applicant
REC-4-Rodenticide	Rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project.	Prior to Project ground disturbing activities	City/Project Applicant