



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



October 20, 2021

Governor's Office of Planning & Research

**Oct 20 2021**

**STATE CLEARING HOUSE**

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**Subject: Notice of Preparation of a Programmatic Environmental Impact Report for the City of Claremont Housing Element Update, SCH #2021090340, Los Angeles County**

Dear Mr. Johnson:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) from the City of Claremont (City; Lead Agency) for the City of Claremont Housing Element Update (Project). Supporting documents include an Initial Study. 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; 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 is also submitting comments as a Responsible Agency under CEQA (Pub. 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, § 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.

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Brad Johnson  
City of Claremont  
October 20, 2021  
Page 2 of 10

## Project Description and Summary

**Objective:** The Project would amend the City's General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element and updating the Safety Element of the General Plan.

- **Housing Element.** The Housing Element is mandated by State law and is updated every eight years. State law requires the Housing Element to identify and analyze existing and projected housing needs, and establish goals, policies, and actions to address those housing needs. The Housing Element includes goals, policies, programs, and objectives to further the development, improvement, and preservation of housing in a manner that is aligned with community desires, regional growth objectives, and State law. The 2021-2029 Regional Housing Needs Allocation (RHNA) to the City is 1,711 units. A total of 2,236 total units would be needed to account for an additional 20 percent buffer capacity above the RHNA. State law requires local jurisdictions to identify available sites that have the appropriate land use and zoning to accommodate the housing units assigned to the City. Site selection is conducted based on an analysis of site-specific constraints, including zoning, access to utilities, location, development potential, density and whether the site is identified in a previous Housing Element.
- **Safety Element.** The Safety Element would be updated to include new information about natural and human-related hazards. The Safety Element currently includes policies to address the following types of hazards: geology and seismicity; stormwater management and flooding; fire hazards; radon gas; hazardous materials; and disaster response. The Safety Element update would focus on ensuring alignment with other City plans and addressing new State requirements pertaining to climate change, wildfire risk, and evacuation routes for residential neighborhoods.

**Location:** The Project is within the City's limits and the City's sphere of influence, which includes portions of unincorporated Los Angeles County (Plan Area). The City is in the San Gabriel Valley within the eastern portion of Los Angeles County. The City is bordered by the cities of Upland, Pomona, La Verne, and Montclair, as well as the County of San Bernardino.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The PEIR should 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

1. Jurisdictional Waters. Figure 3 in the Initial Study shows a Housing Inventory Opportunity Site on the western side of the Plan Area across from Summer Avenue/Clemson Avenue/Summer Elementary School. This opportunity site may be adjacent to Thompson Wash and riparian vegetation surrounding Thompson Wash. According to U.S. Fish and Wildlife Service's (USFWS) [National Wetland Inventory](#), Thomson Wash is classified as a

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 3 of 10

1.48-acre Riverine habitat (USFWS 2021). Surrounding Thompson Wash is potentially riparian vegetation that the USFWS National Wetland Inventory classifies as Forested/Shrub Riparian (USFWS 2021).

- a) Potential Impact. Housing developed as part of the Project at opportunity sites adjacent to Thompson Wash could impact streams and riparian vegetation. Streams could be channelized or diverted underground. Riparian vegetation could be removed or degraded through habitat modification (e.g., loss of water source, encroachment by development, edge effects leading to introduction of non-native plants).
- b) Stream Delineation and Impact Assessment. CDFW recommends the PEIR provide a stream delineation and analysis of impacts on any river, stream, or lake<sup>1</sup>. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
- c) Avoidance and Setbacks. CDFW recommends the Project avoid impacting streams and associated vegetation by avoiding opportunity sites that are adjacent to streams. Herbaceous and vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. Where development may occur near a stream but may avoid impacts on streams, the PEIR should provide minimum standards for effective unobstructed vegetated buffers and setbacks adjoining streams and associated vegetation for all development facilitated by the Project. The buffer and setback distance should be increased at a project-level as needed. The PEIR should provide justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated vegetation.
- d) Mitigation. If avoidance is not feasible, the PEIR should include measures where future housing development facilitated by the Project provides the following:
  - i. A stream delineation and analysis of impacts;
  - ii. A Lake and Streambed Alteration (LSA) Notification to CDFW pursuant to Fish and Game Code Section 1600 et seq. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW<sup>2</sup>. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2021a).

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<sup>1</sup> Please note that "any river, stream, or lake" includes those that are dry for periods of time as well as those that flow year-round.

<sup>2</sup> CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 4 of 10

2. Disclosure. According to the Initial Study, impacts on biological resources “will not be discussed in the EIR” because mitigation proposed in the Initial Study would reduce impacts to less than significant. CDFW recommends the PEIR provide a discussion of the Project’s impact on biological resources that takes into account the Project’s potential impacts on streams (see Comment #1). An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
3. Development and Conservation. To accommodate increased housing needs, the City is expected to build more units in the coming years. CDFW recommends the City maximize development where it already exists to protect natural lands from development and habitat loss. CDFW recommends the City consider regional and State-wide natural resource conservation strategies outlined in the following reports: [Safeguarding California Plan: 2018 Update](#) (CNRA 2018); [California State Wildlife Action Plan: A Conservation Legacy for Californians](#) (CDFW 2015); and, [California 2030 Natural and Working Lands Climate Change Implementation Plan: January 2019 Draft](#) (CalEPA et al. 2019).

### General Comments

- 1) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document “shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.”
  - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends that the City provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
  - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by a project as proposed, an environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, an environmental document should provide an adequate, complete, and detailed disclosure about a project’s proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 5 of 10

- 2) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a 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. An 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 also considers impacts to California Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document 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)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities. 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 2021b);
  - 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 a project's 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](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where a project's construction and activities 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. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2021c). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in 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 within a project site and area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code,

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 6 of 10

§§ 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 2021d). Acceptable species-specific survey procedures may be developed in consultation with CDFW and 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 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.
- 3) Biological Direct, Indirect, and Cumulative Impacts. The PEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The PEIR should address the following:
- a) A discussion regarding Project-related indirect 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 (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 analyzed and discussed in the PEIR;
  - b) A discussion of both the short-term and long-term effects of the Project to species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted [CEQA Guidelines, § 15126.2(a)];
  - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
  - d) A discussion of Project-related changes on drainage patterns; 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. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;
  - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation 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 PEIR; and,

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 7 of 10

- f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the PEIR should indicate why the cumulative impact is not significant. The City's determination be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 4) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, CDFW recommends the following information be included in the PEIR:
- a) A complete discussion of the purpose and need for, and description of the proposed Project;
- b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,
- c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring the Project's potential development footprint in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.
- Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The EIR "shall" include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 8 of 10

- 5) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021e). The City should ensure data collected for the preparation of environmental documents be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 6) Use of Native Plants and Trees. CDFW strongly recommends avoiding non-native, invasive plants for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2021). CDFW supports the use of native species found in naturally occurring vegetation communities within or adjacent to a project site. Where a project may need to replant trees, CDFW supports planting species of trees and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds.
- 7) 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 CESA-listed plant species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity and development 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 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.
- 8) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing an individual from a 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.
- 9) Compensatory Mitigation. An environmental document should include mitigation measures for adverse project-related direct or indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or

Brad Johnson  
City of Claremont  
October 20, 2021  
Page 9 of 10

enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

- 10) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

## Conclusion

We appreciate the opportunity to comment on the NOP for the City of Claremont Housing Element Update to assist the City in identifying and mitigating for the Project's potential impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at (562) 619-2230 or [Ruby.Kwan-Davis@wildlife.ca.gov](mailto:Ruby.Kwan-Davis@wildlife.ca.gov)

Sincerely,

DocuSigned by:  
  
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Brad Johnson  
City of Claremont  
October 20, 2021  
Page 10 of 10

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