



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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Governor's Office of Planning &amp; Research

Oct 20 2021

## STATE CLEARINGHOUSE

October 20, 2021

Allison Cook

City of Agoura Hills

30001 Ladyface Court

Agoura Hills, CA 91301

[ACook@agourahillscity.org](mailto:ACook@agourahillscity.org)**Subject: Notice of Preparation of a Subsequent Program Environmental Impact Report for the City of Agoura Hills General Plan Update, SCH #2021090588, City of Agoura Hills, Los Angeles County**

Dear Ms. Cook:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Subsequent Program Environmental Impact Report (SEIR) from the City of Agoura Hills (City; Lead Agency) for the City of Agoura Hills General Plan Update (Project). 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.

*Conserving California's Wildlife Since 1870*

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 2 of 17

## Project Description and Summary

**Objective:** The Project would update the following four elements of the City's General Plan: Housing Element; Land Use Element; Safety Element; and Circulation Element.

- **Housing Element:** The City is required by State law to prepare a Housing Element update for State certification every eight years. The Housing Element identifies and analyzes existing and projected housing needs, and establishes goals, policies, and actions to address these housing needs, including adequate provision of affordable and special-needs housing. The Regional Housing Needs Assessment (RHNA) quantifies the need for housing in every region throughout the State. The RHNA is mandated by State law and is meant to address existing and future housing needs. The City's total RHNA for the 2021-2029 planning period is 318 units. One of the important steps of the Housing Element update is to identify sites that can accommodate the City's RHNA. Such sites would form the housing site inventory list. With input both from the community and City decision-making bodies, the City has identified 20 possible housing sites (Site A through T) to address the City's RHNA obligation by income group.
- **Land Use Element:** The Land Use Element of the General Plan would be updated to reflect the housing sites identified in the Housing Element. The update will revise the City's Land Use Map, including re-designation of some sites on the housing site inventory list from non-residential use to multi-family residential use, and, for those sites currently designated for housing, a higher density of multi-family residential use will be designated. To meet the City's RHNA obligation, an Affordable Housing Overlay District zone would be placed on all 20 possible housing sites.
- **Safety Element:** The purpose of the Safety Element update is to ensure consistency with the Housing Element update and to comply with recent State legislation and guidelines. Technical amendments would be made to the Safety Element to comply with State, regional, and local policies and guidelines. Technical amendments would include data, policies and maps, and incorporate policies and programs from the Local Hazard Mitigation Plan to address fire, geologic, flooding, and seismic hazards, as well as climate change.
- **Circulation Element:** Minor updates would be made to the Circulation Element to replace references to adopted level of service thresholds with vehicle miles traveled as a metric to evaluate traffic impacts of proposed projects. This shift in standard is mandated by the State as part of Senate Bill 743 in keeping with the State's goals to reduce greenhouse gas emissions, encourage infill development and improve public health through active transportation. The new standard took effect July 2020.

**Location:** The Project includes the existing City boundary of approximately 7.86 square miles. The City is located in western Los Angeles County and near the southeastern edge of Ventura County. The City is bordered by the City of Westlake Village to the west, City of Thousand Oaks to the northwest, unincorporated community of Oak Pak to the north, City of Calabasas and unincorporated areas of Los Angeles County to the east, and unincorporated areas of Los Angeles County to the south.

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 3 of 17

### 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 SEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the SEIR when it is available.

### Specific Comments

- 1) 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).
- 2) Biological Resources Assessment for New Development. CDFW recommends the SEIR include a mitigation measure where future housing development facilitated by the Project provide a biological resources assessment per the guidance provided immediately below. A biological resources assessment should include a discussion of a project's potential impact on biological resources including, but not limited to, biological resources discussed in Comments 3 through 13. Based on the results of the biological resources assessment, a qualified biologist should prepare species- and site-specific measures to avoid, minimize, and/or mitigate for a project's potentially significant impacts on biological resources.
  - a) 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 SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document should include the following information:
    - i. 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 Sensitive Natural 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 2021a);

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 4 of 17

- ii. 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;
  - iii. 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;
  - iv. 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](#) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2021b). 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)];
  - v. A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species within a project site and area of potential effect, including SSC 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 2021c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS; and,
  - vi. 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) Open Space and Natural Habitats. According to the Land Ownership dataset available in the [California Natural Diversity Database in BIOS](#), the Project area, specifically Sites A, B, C, I, M, and S, is adjacent to open space and natural habitat owned by a governmental, non-profits, or private entity and protected for open space purposes (CDFW 2021d).

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 5 of 17

- a) Analysis and Disclosure. CDFW recommends the SEIR discuss the Project's potential impact on open space/natural habitats as a result of new/increased development. The Project could result in additional loss of open space/natural habitats due to fuel modifications and introduction of non-native, invasive plants facilitated by the Project (see Comment #4). The SEIR should disclose the amount of open space/natural habitats potentially developed or otherwise impacted as a result of the proposed Project, including all areas that would be impacted due to fuel modification and grading to accommodate housing development.
- b) Avoidance and Setback. CDFW recommends the Project avoid developing and encroaching onto open space/natural habitats. Encroachment onto open space/natural habitats creates an abrupt transition between two different land uses. Encroachment onto open space/natural habitats could affect environmental and biological conditions and increase the magnitude of edge effects on biological resources (see Comment #5).

CDFW recommends the SEIR provide alternatives to the Project that would not result in conversion of open space/natural habitats into developed areas. Pursuant to CEQA Guidelines section 15126.6, an environmental impact report "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives." Furthermore, an environmental impact report "shall include sufficient information about alternatives to allow meaningful evaluation, analysis, and comparison with the proposed project" (CEQA Guidelines, § 15126.6) (see General Comment #4).

Where development may occur near but may avoid impacts on open space/natural habitats, CDFW recommends the SEIR provide minimum standards for effective unobstructed vegetated buffers and setbacks adjoining open space/natural habitats to be implemented by housing development facilitated by the Project. The buffer and setback distance should be increased at a project-level as needed. The SEIR should provide justifications for the effectiveness of chosen buffer and setback distances to avoid impacts on open space/natural habitats.

- c) Mitigation. If avoidance is not feasible, CDFW recommends the SEIR provide measures where any future development facilitated by the Project mitigates (avoids first if feasible) for project-level impacts on open space/natural habitats not previously identified in the SEIR. The SEIR should provide justifications for the effectiveness of all proposed mitigation measures. The SEIR should provide sufficient information and disclosure to facilitate meaningful public review, analysis, and comment on the adequacy of proposed mitigation measures to offset Project-related impacts on open space/natural habitats.
- 4) Fire. The Project proposes to develop sites and/or increase development in sites within a 'Very High' Fire Severity Zone (County of Los Angeles 2021). Development in the wildland urban interface (e.g., Sites A, B, C, I, M, and S) could increase fire frequency and intensity, thus impacting biological resources. Moreover, fuel modification may need to occur around each development. Fuel modification could result in additional habitat loss. CDFW recommends the SEIR discuss how the Project may impact open space/natural areas with respect to intensifying land use in areas that are highly susceptible to fire.

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 6 of 17

- 5) Impacts on Wildlife Corridors. The Project proposes to develop sites that are currently undeveloped open space/natural habitats. Habitat loss and fragmentation, particularly the loss, fragmentation, or degradation of riparian corridors, could affect wildlife dispersal. For example, development of Site A and Site B could result in the loss of open space/natural habitats that wildlife could use as a steppingstone between the Santa Monica Mountains and open space north of Highway 101. In addition, development of Site A and Site B could impact riparian corridors (i.e., Madera Creek and unnamed drainage west of Kanan Road). Maintaining wildlife corridors and habitat continuity is essential for wildlife survival and is increasingly important considering continued habitat loss and fragmentation, as well as climate change.
- a) Analysis and Disclosure. CDFW recommends the SEIR discuss whether the Project would impact wildlife corridors. Impacts include (but are not limited to) habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement.
  - b) Avoidance and Mitigation. CDFW recommends the Project avoid developing and encroaching onto wildlife corridors. If avoidance is not feasible, CDFW recommends the SEIR provide measures where any future development facilitated by the Project analyzes potential impacts on wildlife corridors and depending on findings, provide measures to mitigate (avoid impacts first if feasible) for project-level impacts on wildlife corridors. An analysis should be supported by studies to document wildlife activity and movement through a project area. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment of significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147). “Technical data and analyses shall be readily available for public examination and shall be submitted to the State Clearinghouse” (CEQA Guidelines, §15147).
- 6) Impacts on Mountain Lion (*Puma concolor*). The Project may result in increased development in the wildland urban interface. Increased development could impact wildlife, particularly mountain lion. The Project area is within or adjacent to the Santa Monica Mountains where an evolutionarily significant unit of mountain lion in southern coastal California occurs. Impacts on mountain lion could result from habitat loss and increased human presence, traffic, noise, and artificial lighting. For example, as human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Indirect impacts on mountain lion could also result from increased vehicle traffic and lighting, which could lead to increased wildlife injury or mortality from vehicle strikes and deter wildlife from using otherwise suitable habitat.
- a) Protection Status: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 7 of 17

- b) Analysis and Disclosure: The SEIR should discuss the Project's potential impacts on mountain lion and habitat. Impacts on habitat include (but are not limited to) habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. The SEIR should discuss whether the Project may have direct and indirect impacts on mountain lion resulting from increased human presence, traffic, noise, and artificial lighting. An assessment of impacts on mountain lion should also provide a discussion of edge effects, including (but not limited to) introduction and invasion of non-native plant species into natural areas; attraction for wildlife with food or backyard conditions; predation and disease by domestic animals; and habitat fragmentation caused by volunteer trails.
  - c) Avoidance: CDFW recommends the City avoid and minimize development and encroachment onto lands essential for mountain lion dispersal, breeding and denning sites, and foraging habitat.
  - c) Mitigation: If avoidance is not feasible, CDFW recommends the SEIR provide measures to mitigate for the Project's potentially significant impact on mountain lion. CDFW recommends the SEIR provide measures where any future development facilitated by the Project analyzes potential impacts on mountain lion and, based on findings, provide measures to mitigate (avoid impacts first if feasible) for project-level impacts on mountain lion not previously identified in the SEIR. Appropriate mitigation may include requiring any future development facilitated by the Project obtain appropriate take authorization under CESA (pursuant to Fish & Game Code, § 2080 et seq.). Additionally, the SEIR should provide measures where any future development facilitated by the Project provide compensatory mitigation for significant impacts on mountain lion and habitat.
  - d) CESA: Appropriate take authorization under CESA may include an Incidental Take Permit (ITP) or Consistency Determination, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. To obtain appropriate take authorization under CESA, early consultation with CDFW 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.
- 7) Jurisdictional Waters. According to Figure 2 in the NOP and the U.S. Fish and Wildlife Service's (USFWS) [National Wetland Inventory](#), multiple watercourses are located within the City, which includes, but not limited to, the following: Madea Creek located east of Site A; unnamed drainage located west of Site B, and unnamed drainage is located west of Site D (USFWS 2021a). Housing developed as part of the Project at sites adjacent to streams could impact the stream and associated riparian vegetation. Streams could be channelized or diverted underground. The watercourse could become impaired because of streambank erosion resulting from a housing development. Riparian vegetation along a stream 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).



Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 8 of 17

- a) Stream Delineation and Impact Assessment. CDFW recommends the SEIR 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.
  - b) Avoidance and Setbacks. CDFW recommends the Project avoid impacts on streams and associated vegetation by avoiding or minimizing housing development 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 SEIR 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 SEIR should provide justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated vegetation.
  - c) Mitigation. If avoidance is not feasible, the SEIR 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 2021e).
- 8) Crotch's Bumble Bee (*Bombus crotchii*). According to the CNDDDB, Crotch's bumble bee is known to occur in the Project area, specifically Site C. The Project could result in development of habitat (e.g., scrub and grasslands) supporting Crotch's bumble bee. CDFW recommends the SEIR discuss the Project's potential impacts on Crotch's bumble bee. Crotch's bumble bee is listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017). 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

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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.



Allison Cook  
 City of Agoura Hills  
 October 20, 2021  
 Page 9 of 17

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 the City (CEQA Guidelines, § 15065).

- 9) Rare Plants. The following species of rare plants may occur in the Project area: Catalina mariposa lily (*Calochortus catalinae*); Agoura Hills dudleya (*Dudleya cymosa* ssp. *agourensis*); Santa Monica mountains dudleya (*Dudleya cymosa* ssp. *ovatifolia*); Lyon's pentachaeta (*Pentachaeta lyonii*); Ojai navarretia (*Navarretia ojaiensis*); and Santa Susana tarplant (*Deinandra minthornii*). The Project area is also within 2 miles of critical habitat for Lyon's pentachaeta (USFWS 2021b). Agoura Hills dudleya, Santa Monica mountains dudleya, and Lyon's pentachaeta are listed under the Endangered Species Act (ESA). Lyon's pentachaeta is also listed under CESA. Ojai navarretia and Santa Susana tarplant has a State Rarity Rank of 1B.1 and 1B.2, respectively. Catalina mariposa lily has a State Rarity Rank of 4.2.

CDFW recommends the SEIR discuss the Project's potential impacts on rare plants and habitat. Impacts on rare plants could be significant under CEQA [CEQA Guidelines, §§ 15065(a)(1), 15380]. CDFW recommends the City avoid and minimize development and encroachment onto lands supporting CESA and ESA-listed rare plant species and habitat. If avoidance is not feasible, CDFW recommends the SEIR provide measures where any future development facilitated by the Project analyzes impacts on rare and special-status plants. CDFW also recommends the SEIR provide measures where any future development facilitated by the Project provide compensatory mitigation for impacts on rare and special-status plants. Appropriate mitigation may include requiring any future development facilitated by the Project obtain appropriate take authorization under CESA (pursuant to Fish & Game Code, § 2080 et seq.) and ESA.

- 10) Oak Trees (*Quercus* genus) and Oak Woodlands (*Quercus* genus Woodland Alliance). Development of housing sites including, but not limited to A, B, C, D, F, H, I, and M could result in loss of oak trees and oak woodlands. CDFW considers oak woodlands to be a sensitive plant community. Oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding, regulating water flow in watersheds, and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Moreover, oak trees and woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372) and Public Resources Code section 21083.4 due to the historic and on-going loss of these resources.

CDFW recommends the SEIR discuss the Project's potential impacts on oak trees and oak woodlands. CDFW recommends the City avoid and minimize development and encroachment onto oak woodlands. If avoidance is not feasible, CDFW recommends the SEIR provide measures where any future development facilitated by the Project analyzes impacts on oak trees and oak woodlands. CDFW also recommends the SEIR provide measures where any future development facilitated by the Project provide compensatory mitigation at no less than 3:1 the number of oak trees and acres of oak woodland habitat impacted. The number of replacement trees and oak woodland habitat acres should be

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 10 of 17

higher if the Project would impact large oak trees; impact an oak woodland supporting rare, sensitive, or special status plants and wildlife; or impact an oak woodland with a State Rarity Ranking of S1, S2, or S3.

11) Nesting Birds. The Project could develop open space/natural habitats that provide habitat for nesting birds. For example, Site A is within or adjacent to a bird hotspot located at [Kanan Road at Cornell Road](#) (eBird 2021). Development of Site A or any site that is currently open space/natural habitat could impact nesting birds and raptors. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.

- a. Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
- b. Avoidance. CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. CDFW recommends the SEIR include a measure where future development facilitated by the Project avoids ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
- c. Minimizing Potential Impacts. If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the SEIR include measures where future development facilitated by the Project minimize impacts on nesting birds. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the Project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

12) Loss of Bird and Raptor Nesting and Breeding Habitat. The Project could develop open space/natural habitats providing habitat for nesting birds.

- a) Analysis and Disclosure. CDFW recommends the SEIR analyze and discuss the Project's impacts on bird and raptor nesting and breeding habitat. Edge effects should also be analyzed and discussed. CDFW recommends the SEIR disclose the amount of bird and raptor nesting and breeding habitat that could be impact and lost as a result of the proposed Project.

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 11 of 17

- b) Avoidance and Mitigation. CDFW recommends the Project avoid and minimize development and encroachment onto habitat for nesting birds. If avoidance is not feasible, CDFW recommends the SEIR provide measures where future development facilitated by the Project provide compensatory mitigation for loss of nesting bird habitat. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern (SSC). Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.

In addition, CDFW recommends the SEIR provide measures where future development facilitated by the Project avoid and minimize removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density. If trees are removed, CDFW recommends future development facilitated by the Project provides replacement to compensate for temporal or permanent loss habitat within a project site. This includes replacing understory vegetation (e.g., ground cover, subshrubs, and shrubs). CDFW recommends planting native tree species that are beneficial to birds.

- 13) Bats. Trees in proposed housing sites could provide suitable habitat for bat roosts. Removing trees supporting bat roosts could have direct and/or indirect impacts on bats and roosts. 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). In addition, some bats are considered SSC. CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Accordingly, CDFW recommends the SEIR provide measures where future development facilitated by the Project provides surveys for bats and roosts. The project-level environmental document should disclose and discuss potential impacts on bats/roosts. If necessary, to reduce impacts to less than significant, the project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].
- 14) Los Angeles County Significant Ecological Areas (SEAs). The Project area, specifically Sites A, B, C, I, M, and S, is within or adjacent to the Santa Monica Mountains SEA. [Los Angeles County Significant Ecological Areas](#) are officially designated areas within Los Angeles County identified as having irreplaceable biological resources (LACDRP 2019). These areas represent the wide-ranging biodiversity of Los Angeles County and contain some of Los Angeles County's most important biological resources. CDFW recommends the SEIR provide a discussion of Project impacts on the Santa Monica Mountains SEA.

### **General Comments**

- 1) Disclosure. 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).

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 12 of 17

- 2) 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.

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.

- 3) Biological Direct, Indirect, and Cumulative Impacts. The SEIR 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 SEIR 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 SEIR;
- b) A discussion of both the short-term and long-term effects of the Project on 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

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 13 of 17

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 SEIR; and,
  - 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 SEIR 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 fish, wildlife, and plants, CDFW recommends the following information be included in the SEIR:
- 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

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 14 of 17

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.
- 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 [CNDDB Field Survey Forms](#) (CDFW 2021f). 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) 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.
- 8) 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 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



Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 15 of 17

governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

- 9) 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.
  
- 10) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California" (CFGF 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
  - a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the SEIR and these measures should compensate for the loss of function and value.
  
  - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that

Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 16 of 17

negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

## Conclusion

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

Sincerely,

DocuSigned by:  
  
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Erinn Wilson-Olgin  
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ec: CDFW

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Allison Cook  
City of Agoura Hills  
October 20, 2021  
Page 17 of 17

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