



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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SENT BY EMAIL ONLY

Governor's Office of Planning & Research

December 27, 2021

Dec 27 2021

Mr. Jeff Kugel
City of Glendora
116 East Foothill Boulevard
Glendora, CA 91741
JKugel@cityofglendora.org

STATE CLEARINGHOUSE

Subject: City of Glendora Housing Element Update – 6th Regional Housing Needs Assessment Cycle – 2021-2029, Negative Declaration, SCH #2021120003, City of Glendora, Los Angeles County

Dear Mr. Kugel:

The California Department of Fish and Wildlife (CDFW) has reviewed the Negative Declaration (ND) from the City of Glendora (City; Lead Agency) for the Housing Element Update – 6th Regional Housing Needs Assessment (RHNA) Cycle – 2021 - 2029 (Project). The Project is proposed by the City of Glendora (Project Applicant). 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

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& G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The Project proposes a housing element update (HEU) to address the City housing needs for the October 15, 2021 to October 15, 2029 Planning Period. The HEU sets goals, objectives, policies, and programs to achieve future housing needs for the City. The southern California Association of Governments (SCAG) RHNA allocation for the City identified a housing need of 2,276 units. The 2,276 units allocated to the City is divided into the following categories: 368 extremely low-income units, 367 very low-income units, 368 low-income units, 388 moderate-income units, and 767 above moderate-income units. In addition, the City anticipates twenty accessory dwelling units (ADUs) will be developed annually. Currently, the City has eighty-four units that have been approved or are in the entitlement process. These units will be credited to the above moderate-income units.

In an effort to meet the RHNA, the City proposes to increase population density and rezone several sites. The Route 66 Barranca Gateway and Arrow Highway sites will increase their current units per acre and maximum stories per building. The increase proposes 30 units per acre and three stories maximum per building. The City also proposes to rezone two sites within the three years following the HEU adoption. The first site is the Route 66/Glendora site, which comprises of 12 parcels on 3.67 acres. The site will be rezoned to permit 30 units per acre and will potentially yield 71 net units. The second site is 100 W Route 66, which comprises of 15 parcels on roughly 4 acres. The site will be rezoned to also permit 30 units per acre and potentially yield 87 net units. Furthermore, there are 64 acres and 36 acres within the Route 66 Specific Plan and Arrow High Specific Plan that have potential for redevelopment. Likewise, there are 44 acres of vacant and underutilized sites within the City that can be utilized for redevelopment. Lastly, there is no physical development, construction, or other ground disturbance activity proposed in the HEU. Adoption of the HEU does not approve any future housing developments.

Location: The Project will encompass the entire City of Glendora, located at the base of the San Gabriel Mountains, within Los Angeles County. The City of Glendora is bounded by the City of Azusa to the west, City of La Verne to the east, City of Covina to the south and San Gabriel Mountains to the north.

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 impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

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Specific Comments

Comment #1: Impacts on Coastal California Gnatcatcher

Issue: CDFW is concerned the Project could impact coastal California gnatcatcher (*Polioptila californica californica*), an Endangered Species Act (ESA)-listed threatened species and a California Species of Special Concern (SSC).

Specific Impacts: Project housing development activities during the coastal California gnatcatcher breeding and nesting season could result in the incidental loss of fertile eggs or nestlings.

Why impacts would occur: The South Hills located within the City of Glendora is designated as the East San Gabriel Valley significant ecological area. Numerous observations of wildlife have been recorded within the South Hills including coastal California gnatcatcher (CDFW 2021f). According to Figure 2 in the ND, there are various sites located adjacent to South Hills where the population density will increase as well as future developments may occur. Future development near or within the South Hills can result in injury or mortality of unidentified gnatcatcher, including eggs or nestlings. Furthermore, removal of trees can result in loss of breeding and foraging habitat for coastal California gnatcatcher.

Evidence impact would be significant: CEQA provides protection for special status species, including Species of Special Concern (SSC). These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065). The reductions in the number of special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends the ND require any future proposed housing development to conduct coastal California gnatcatcher surveys to determine presence/absence of gnatcatcher. Future Project proponents should retain a qualified biologist with an appropriate USFWS permit to survey the areas. The qualified biologist should conduct surveys according to USFWS [Coastal California Gnatcatcher \(*Polioptila californica californica*\) Presence/Absence Survey Guidelines](#) (USFWS 1997). The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.

Mitigation Measure #2: CDFW also recommends subsequent developments avoid any construction activity during nesting season. If not feasible, CDFW recommends that if future

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housing development occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the ND require subsequent Project proponents require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

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

Recommendation: Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.

Comment #2: Impacts on Bats

Issue: The MND does not provide a mitigation measure that addresses bat species within the Project site.

Specific Impacts: According to the [California Natural Diversity Database](#), the pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis*), and hoary bat (*Lasiurus cinereus*) have been observed within and adjacent to the Project site (CDFW 2021e). In addition, bats including the hoary bat have been observed and recorded near the Project site (iNaturalist 2020). Future housing developments may have direct impacts that involves removal of trees, vegetation, and/or structures. These trees, vegetation, and/or structures may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts from future housing developments may result from increased noise disturbances, human activity, dust, ground disturbing activities (e.g., staging, access, grading, excavating, drilling), and vibrations caused by heavy equipment.

Why impacts would occur: In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts (Avila-Flores and Fenton 2005; Oprea et al. 2009; Remington and Cooper 2014). Trees and crevices in buildings in and adjacent to the Project site could provide roosting habitat for bats. Bats can fit into very small seams, as small as a ¼ inch. Modifications

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to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

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 species are considered California Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: For future housing developments, CDFW recommends the ND require future Project proponents to retain a qualified bat specialist to conduct bat surveys within the Project site and within a 500-foot buffer. Bat surveys allow for the identification of potential habitat that could support daytime and/or nighttime roost sites. CDFW recommends bat surveys are conducted using acoustic recognition technology to maximize detection of bats. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats. Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City. Surveys and mitigation measures should be submitted prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

Mitigation Measure #2: CDFW recommends the City include the following tree removal process as a mitigation measure for future housing developments. "If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees, trees shall be pushed down using heavy machinery rather than felling it with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape."

Mitigation Measure #3: CDFW also recommends the City includes the following measure in the event that maternity roosts are found during surveys for future housing development projects. "If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30). If tree removal occurs during maternity season, trees identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist. Inspection of each tree should be no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. Trees determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an

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active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.”

Additional Recommendations

Jurisdictional Waters. The Big Dalton Wash and Little Dalton Wash run through the City of Glendora. In addition, the San Dimas Wash runs through the southern extent of the City. CDFW recommends future housing developments assess the Project’s potential impacts on streams. Modifications to a river, creek, or stream in one area may result in bank erosion, channel incision, or drop in water level along that stream outside of the immediate impact area. If a future development results in impacts to a stream, the Project proponent should apply for a Lake and Stream Alteration Agreement pursuant under Fish and Game Code, section 1600 *et seq.* The Project applicant (or “entity”) must provide notification to CDFW pursuant to Fish and Game Code, section 1600 *et seq.* Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. Please visit CDFW’s [Lake and Streambed Alteration Program](#) webpage to for information about LSA Notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2020b). CDFW also recommends the LSA Notification should include a hydrology report to evaluate whether altering the streams may impact headwater streams where there is hydrologic connectivity. The hydrology report should also include a scour analysis to demonstrate that stream banks and streambed would not erode as a result of impacts within the Project site. Also, CDFW also requests a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions.

Biological Baseline Assessment and Impact Analysis. CDFW recommends the ND require subsequent projects provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The ND 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 ND should require subsequent projects to include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a [State-wide ranking](#) of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level (CDFW 2020c);

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b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities](#) (CDFW 2018a);

c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. [The Manual of California Vegetation](#), second edition, should also be used to inform this mapping and assessment (Sawyer, 2009). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project;

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 & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and

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

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity 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 detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2021d). The City should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The City should provide CDFW with confirmation of data submittal.

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist the City in developing 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 (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation

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measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

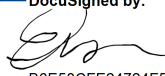
Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Glendora and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Glendora in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Glendora has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Julisa Portugal, Environmental Scientist, at (562) 330-7563 or Julisa.Portugal@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
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ec: CDFW

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Attachment A: Draft Mitigation and Monitoring Reporting Plan

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

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- coastal California gnatcatcher Survey	Any future proposed housing development shall conduct coastal California gnatcatcher surveys to determine presence/absence of gnatcatcher. Future Project proponents shall retain a qualified biologist with an appropriate USFWS permit to survey the areas. The qualified biologist shall conduct surveys according to USFWS Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) Presence/Absence Survey Guidelines . The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol shall be followed for all surveys unless otherwise authorized by the USFWS in writing. CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.	Prior to construction activities and vegetation removal	Project-level lead agency/ Designated Biologist
MM-BIO-2- Nesting Bird Surveys	Subsequent developments shall avoid any construction activity during nesting season. If not feasible, if future housing development occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate		Project-level lead agency/ Designated Biologist

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	<p>on potential roosting or perch sites. CDFW recommends the ND require subsequent Project proponents require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p>		
<p>MM-BIO-1- Bat Surveys</p>	<p>Future Project proponents shall retain a qualified bat specialist to conduct bat surveys within the Project site and within a 500-foot buffer. Bat surveys allow for the identification of potential habitat that could support daytime and/or nighttime roost sites. CDFW recommends bat surveys are conducted using acoustic recognition technology to maximize detection of bats. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats. Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City. Surveys and mitigation measures shall be submitted prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.</p>	<p>Prior to construction activities and vegetation removal</p>	<p>Project-level lead agency/ Bat Specialist</p>
<p>MM-BIO-2- Bat Tree Removal Process</p>	<p>If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees, trees shall be pushed down using heavy machinery rather than felling it with a chainsaw. To ensure the optimum warning for</p>	<p>During any construction and activities</p>	<p>Bat Specialist</p>

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	any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape.		
MM-BIO-3- Bat Maternity Roost Detection	If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30). If tree removal occurs during maternity season, trees identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist. Inspection of each tree shall be no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. Trees determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.	Prior to and during any construction and activities	Bat Specialist
REC-1- Consultation	CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.	Prior to any construction activities and vegetation removal	Project-level lead agency/ Project Applicant
REC-2- Jurisdictional Waters	CDFW recommends the ND require future housing developments asses the Project’s potential impacts on streams. Modifications to a river, creek, or stream in one area may result in bank erosion,	Prior to construction activities and	City of Glendora/ Project-level lead agency

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	<p>channel incision, or drop in water level along that stream outside of the immediate impact area. If a future development results in impacts to a stream, the Project proponent should apply for a Lake and Stream Alteration Agreement pursuant under Fish and Game Code, section 1600 <i>et seq.</i> The Project applicant (or “entity”) must provide notification to CDFW pursuant to Fish and Game Code, section 1600 <i>et seq.</i> Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. Please visit CDFW’s Lake and Streambed Alteration Program webpage to for information about LSA Notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal. CDFW also recommends the LSA Notification should include a hydrology report to evaluate whether altering the streams may impact headwater streams where there is hydrologic connectivity. The hydrology report should also include a scour analysis to demonstrate that stream banks and streambed would not erode as a result of impacts within the Project site. Also, CDFW also requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions.</p>	<p>vegetation removal</p>	
<p>REC-3- Biological Baseline Assessment</p>	<p>CDFW recommends the ND require subsequent projects provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The ND should include the</p>	<p>Prior to construction activities and vegetation removal</p>	<p>Project-level lead agency/ Project Applicant</p>

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	<p>following information:</p> <p>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 ND should require subsequent projects to include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a State-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level</p> <p>b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</p> <p>c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions</p> <p>d) A complete, recent, assessment of the biological resources associated with each habitat type on site and</p>		
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	<p>within adjacent areas that could also be affected by the Project</p> <p>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 & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and</p> <p>f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.</p>		
<p>REC-4- Data</p>	<p>Project-level lead agencies shall ensure sensitive and special status species data have been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. Confirmation of data submittal shall be provided to CDFW.</p>	<p>Prior to finalizing/adopting project-level CEQA document</p>	<p>Project-level lead agency</p>

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REC-5- Mitigation and Monitoring Reporting Plan	The City should update the Project's environmental document to include mitigation measures recommended in this letter. The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing/ adopting project-level CEQA document	City of Glendora
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