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BY EMAIL ONLY

May 19, 2022

Melissa Soto
California State University, Long Beach
Office of Design + Construction Services
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Subject: Notice of Preparation of a Draft Environmental Impact Report for the proposed California State University, Long Beach Master Plan Update, SCH #2022040460, County of Los Angeles

Dear Ms. Soto:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) by the California State University, Long Beach (CSULB) for the for the CSULB Master Plan Update Project (Project). The NOP's supporting documents included a Project Initial Study (IS). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is submitting comments as the trustee agency for the State's fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a), 1802; Pub. Resources Code, § 21070; Cal. Code Regs., tit. 14, § 15386, subd. (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. (Fish & G. Code, § 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 the State's fish and wildlife resources.

CDFW is also submitting comments as a potential responsible agency under CEQA (Pub. Resources Code, § 21069; Cal. Code Regs., tit. 14, § 15381) because the Project might require a permit from CDFW in the form of a streambed alteration agreement under Fish and Game Code section 1602 and/or of take authorization under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) and the Native Plant Protection Act (Fish & G. Code, § 1900 et seq.). CDFW expects the Project proponent to obtain appropriate authorization for the Project under the Fish and Game Code from CDFW.

Project Description and Summary

Objective: The Project proposes a comprehensive update of the current campus Master Plan, last updated in 2008, to accommodate enrollment growth, campus population, and physical development of the campus through the year 2035. The Project focuses on optimizing the existing physical assets of the campus, enhancing the efficiency of facilities throughout the campus, and evolving the existing buildings and programs to accommodate future campus needs, thereby minimizing the need for net new developed square footage. The CEQA document for this Project will be evaluated at a programmatic level for use in evaluating later development activities proposed as well as a project level for specific near-term projects.

The primary strategies for implementing the Project include renovation of existing buildings, demolition and replacement of existing buildings in the same physical location, construction of new buildings, and leaving buildings in their existing location and configuration. The Project also identifies goals and strategies to improve open space, mobility, parking, sustainability, and resiliency.

Location: The Project site consists of the CSULB campus located within the City of Long Beach, in southern Los Angeles County, California. The City of the Long Beach is bordered by the cities of Paramount and Lakewood to the north; the Pacific Ocean to the South; the cities of Hawaiian Gardens, Cypress, and Los Alamitos, the unincorporated community of Rossmoor, and the city of Seal Beach in Orange County to the east; and the cities of Los Angeles, Carson, and Compton to the west.

Comments and Recommendations

CDFW offers the following comments and recommendations below to assist CSULB in adequately identifying, avoiding, and mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources (Pub. Resources Code, § 21061; Cal. Code Regs., tit. 14, §§ 15003, subd. (i), 15151). CDFW looks forward to commenting on the DEIR when it becomes available.

Specific Comments

1) Jurisdictional Waters. Bouton Creek runs through the Project site and may be impacted by future development within or adjacent to the creek. 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 provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq*.

    a) Analysis and Disclosure. In preparation of the Project's DEIR, CDFW recommends the DEIR include a stream delineation and evaluation of impacts on any river, stream, or lake. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin *et al*. 1979). The DEIR should discuss the Project's potential impact on streams including impacts on associated natural communities. Potential impacts may include changes to drainage pattern, runoff, and sedimentation.

The DEIR should include a map of where Project development and rezoning could occur overlaid on streams.

b) Lake and Streambed Alteration Agreement. CDFW's issuance of a Lake and Streambed Alteration (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. Please visit CDFW's Lake and Streambed Alteration Program webpage for information about LSA Notification (CDFW 2022).

2) Nesting Birds. There are trees and shrubs within the Project site that could support nesting birds. Project activities occurring during the nesting bird season, especially in areas providing suitable nesting habitat, could result in the incidental loss of fertile eggs or nestlings, or 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 3502, 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) Analysis and Disclosure. The DEIR should discuss the Project's potential impact on nesting birds and raptors. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the Project resulting in ground-disturbing activities and/or vegetation removal.

c) Avoidance. CDFW recommends the DEIR include measures that require future projects facilitated by the Project to fully avoid impacts on nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g. mobilizing, staging, drilling, and excavating), and vegetation removal should occur 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.

3) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Miner and Stokes 2005). Project-related activities may include plans to demolish currently existing structures and the construction of new structures, which could impact roosting bats. This could result in injury and/or mortality of bats, as well as loss of roosting habitat. Bats and roosts could also be impacted by increased noise, human activity, dust, and ground vibrations.

a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code Regs., tit. 14, § 251.1). In addition, some bats are considered a California Species of Special Concern (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 § 15065).

b) Analysis and Disclosure. The DEIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the Project resulting in ground-disturbing activities and/or vegetation removal.

c) Avoidance and Minimization. If the Project would impact bats, CDFW recommends the DEIR include measures that require future projects facilitated by the Project to avoid and minimize impacts on bats, roosts, and maternity roosts. Individual projects should be required to retain a qualified bat specialist identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. The DEIR should include mitigation measures in accordance with California Bat Mitigation Measures (Johnston et al. 2004) that would be implemented at a project-level.

General Comments

1) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project 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 CSULB 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).

   b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

2) 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 sensitive natural communities detected by completing and submitting CNDDB Field Survey Forms (CDFW 2022). To submit additional information on sensitive natural communities, the Combined Rapid Assessment and Releve Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022). CSULB should ensure data collected for the preparation of the DEIR be properly submitted and with all applicable data fields filled out.

3) 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 the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to California Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information:

   a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity 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 2022);

   b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Botanical field surveys should be comprehensive over the entire Project area, including areas that could be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology;

   c) Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project area and within adjacent areas. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer *et al.* 2009). This assessment should include adjoining habitat areas that could be directly or indirectly impacted by the Project;

   d) A complete and recent assessment of the biological resources associated with each habitat type in the Project area and within adjacent areas. CDFW's California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2022). An assessment should include a minimum nine-quadrangle search of the CNDDB to determine a list of species potentially present in the Project area. A lack of records in the CNDDB does not

mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

e) A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project area and adjacent areas, 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 the Project area 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 2022). Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service; 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 projects may warrant periodic updated surveys for certain sensitive taxa, particularly if build out and project implementation could occur over a protracted time frame or in phases.

4) Biological Direct, Indirect, and Cumulative Impacts. The DEIR 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 DEIR 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 areas adjacent to the Project, should be fully analyzed and discussed in the DEIR;

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) 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 DEIR; and,

e) 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 natural communities. If CSULB determines that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant. CSULB's determination should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

5) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2800, 2085; Cal. Code Regs., tit, 14 §786.9). Consequently, if the Project or any Project-related activities during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order 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.

6) Use of Native Plants and Trees. CDFW supports the use of native plants for any project proposing revegetation and landscaping. 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 2022). CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project area. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) in order to create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

7) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location 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 endangered, rare, or threatened plants and animals. 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 plants and animals and their habitats.

8) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization 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 inadequate to 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 and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

9) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset 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" (CFGC 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 benefiting local and transient wildlife populations. CDFW recommends mitigation

measures to compensate for unavoidable impacts be included in the DEIR 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 negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

Conclusion

We appreciate the opportunity to comment on the NOP for the California State University, Long Beach Master Plan Update Project to assist the California State University of Long Beach in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Nicole Leatherman, Environmental Scientist, at Nicole.Leatherman@wildlife.ca.gov or (858)-761-8020.

Sincerely,

DocuSigned by:
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Erinn Wilson-Olgin
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