



State of California – Natural Resources Agency  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



Governor's Office of Planning & Research

SENT BY EMAIL ONLY

**Aug 17 2022**

August 17, 2022

**STATE CLEARINGHOUSE**

Jimmy Wong  
City of Santa Fe Springs  
11710 Telegraph Road  
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**Subject: OU2 Groundwater Containment Facility, Mitigated Negative Declaration, SCH #2022070227, City of Santa Fe Springs, Los Angeles County**

Dear Mr. Wong:

The California Department of Fish and Wildlife (CDFW) has reviewed an Initial Study/Mitigated Negative Declaration (MND) from the City of Santa Fe Springs (City) for the OU2 Groundwater Containment Facility (Project). The Project is proposed by Omega OU2, LLC (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 & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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## Project Description and Summary

**Objective:** The Project proposes to construct and operate a groundwater treatment facility within the Project site. The total building area for the proposed groundwater treatment facility is 48,515 square feet. The two-level treatment facility will house equipment and groundwater treatment activities. Specifically, the ground level will consist of a 2,693-square-foot office space and an equipment area of 40,727 square feet. The top floor will consist of a 1,940-square-foot mezzanine office and a 3,289-square-foot storage space. Within the facility, the Project proposes to install a greensand filtration system, an advanced oxidation process package system, liquid phase granular activated carbon adsorption vessels, a reverse osmosis treatment system, and a backwash and permeate storage tank.

In addition to the treatment facility, the Project proposes to construct and operate seven groundwater extraction wells at four well sites. Groundwater will be pumped from the extraction wells to the treatment plant via untreated below-grade conveyance pipelines. The groundwater pipelines will be constructed of double contained high density polyethylene material. The Project also proposes to construct a new outfall at a specific location along the San Gabriel River to serve as the primary discharge site. The treated groundwater will be conveyed via below grade conveyance pipelines from the treatment plant to the newly constructed outfall for discharge into the San Gabriel River. The treated groundwater will flow downstream within the San Gabriel River and infiltrate back into the aquifer.

Aside from groundwater treatment, the Project site will consist of five standard stalls, two van accessible stalls, an electric vehicle stall, and an additional 72 stalls. Paving a certain portion of the Project site will accommodate up to 80 parking stalls. Lastly, the Project proposes to provide a total of 18,124 square feet of landscaping throughout the site.

**Location:** The Project site is approximately 3.23 acres located at 10051 Santa Fe Springs Road, in the City of Santa Fe Springs, Los Angeles County. The Project site is bounded by McCann Drive to the north, Telegraph Road to the south, Norwalk Boulevard to the west, and Santa Fe Springs Road to the east. The Project location encompasses Assessor's Parcel Number 8005-015-050.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately avoiding and/or mitigating the Project's 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).

### Specific Comments

#### Comment #1: Impacts to Streams

**Issue:** The Project may result in potential impacts to the San Gabriel River due to construction of a new outfall and groundwater discharge.

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**Specific impacts:** Construction of a new outfall to allow for discharge of treated groundwater may result in alteration of the hydrologic flow at the discharge site and downstream of the San Gabriel River. In addition, the physical and chemical characteristics of the existing water within the river may be impacted through the introduction of treated groundwater.

**Why impacts would occur:** Based on the MND, the Project intends to construct a new outfall in the southern portion of the San Gabriel River. The new outfall will serve as a primary discharge location for treated groundwater. The addition of an unknown amount of groundwater into the river may alter its hydrological flow. Page 38 of the MND states, "Interruption of hydrological flow is not expected to occur." Aside from this one sentence, the MND does not disclose a justification as to how or why the hydrological flow of the San Gabriel River will not be disrupted. Moreover, no hydrological study is provided to demonstrate that the natural flow of the San Gabriel River will be undisturbed. Discharging an unknown amount of groundwater into the river may result in changes of flow, velocity, depth, and volume. In addition to changes in hydrological flow, adding more water into the river may also contribute to sedimentation and channel erosion issues at the discharge site and downstream.

Additionally, the MND does not disclose information regarding the water quality of the discharged groundwater. Although the treatment process is described in the MND, it is unclear if the treated groundwater may contain chemical characteristics that would adversely impact the water quality. The addition of treated groundwater may alter the pH, turbidity, nutrient load, and chemical composition of the existing water at the discharge site and downstream. Changes to the water quality may also have a ripple effect on wading birds, microorganisms, herbaceous vegetation, and wildlife that may utilize the unlined portion of the San Gabriel River. Moreover, altering the chemical characteristics and hydrological flow of water may lead to changes in community composition, increase of exotic or invasive species, and decrease in species diversity.

The MND further states that the discharge site "...is not a suitable habitat for migratory fish or wildlife species." CDFW is unable to assess the biological value of the discharge site since the MND does not provide a map or accurate location aside from "river station 866+00". However, wildlife that have adapted to urbanized areas may still utilize this unlined portion of the river if it has the potential to provide water, food, refuge, or habitat. Overall, installing a new outfall and increasing groundwater discharge may have an impact on the sedimentation, erosion, hydrologic flow, water quality, and associated biological resources at the discharge site and downstream.

**Evidence impacts would be significant:** The Project will alter the channel by constructing a new outfall to allow for discharge of groundwater into the San Gabriel River. Introduction of treated groundwater may alter the existing water quality and hydrological flow. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 *et seq.* to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream or lake; or

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- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration (LSA) Notification when a project activity may substantially adversely affect fish and wildlife resources. The Project could result in reasonably foreseeable impacts on streams. The MND does not provide measures to mitigate for potentially significant impacts. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

### **Recommended Potentially Feasible Mitigation Measure(s):**

**Recommendation #1:** The MND should include an analysis of hydrological flow under wet and dry conditions. At a minimum, the analysis should evaluate a study reach from the discharge site to the southern portion of the San Gabriel River that may be impacted. The analysis should discuss the volume of water flow under pre-Project (i.e., baseline) conditions and post-Project conditions during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.

**Recommendation #2:** The MND should analyze and discuss the Project's effect on the water quality of the existing water under pre-Project and post-Project conditions. An adequate analysis should provide the following information at a minimum:

- 1) A map depicting the discharge location and the southern portion of the San Gabriel River that may be impacted as a result of Project activities;
- 2) Discussion of any inorganic/chemical compounds that may be associated with the treated groundwater (e.g., calcium, phosphate, nitrate);
- 3) Discussion of any metals that may be associated with the treated groundwater (e.g., copper, zinc, lead, mercury, iron);
- 4) Project effects on water quality (e.g., dissolved oxygen, turbidity, pH, and temperature) at the discharge site and downstream; and
- 5) Any Project-related temporal, partial, or permanent effect on water quality at the discharge site and downstream.

**Recommendation #3:** CDFW's issuance of an 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 CEQA document from the City for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the Project's CEQA 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. As such, CDFW recommends the City consider CDFW's comments and revise the MND by incorporating the mitigation measures and revisions recommended in this letter into the Project's final environmental document.

To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution

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control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

**Mitigation Measure #1:** The Project will result in a newly constructed outfall and discharge of treated groundwater into the San Gabriel River. For any such activities, the Project Applicant must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and additional information, CDFW determines whether a LSA Agreement with the applicant is required prior to conducting the Project activities. The LSA notification to CDFW should provide the following information:

- 1) A stream delineation in accordance with the U.S. Fish and Wildlife Service wetland definition adopted by CDFW (Cowardin *et al.* 1979);
- 2) Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. Plant community names at the discharge site and downstream should be provided based on vegetation association and/or alliance per the [Manual of California Vegetation](#), second edition (Sawyer *et al.* 2009);
- 3) Discussion on whether the Project would result in impacts on the San Gabriel River downstream from the discharge site. Potential impacts such as changes to drainage pattern, erosion, and sedimentation should be analyzed; and
- 4) A hydrological study to show the impacts of the Project on the hydrology of the watercourse. The hydrology study should include an analysis to determine if the water discharge will impact the current hydrologic flow (e.g., cfs, acre-feet) and hydraulics (e.g., velocity) on site and downstream. Additionally, the hydrological evaluation should assess a sufficient range of storm events (e.g., 100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate how water and sediment is conveyed under pre-Project and post-Project conditions.

Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information about LSA Notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2022b).

### **Additional Recommendations**

**Landscaping.** The Project proposes drought-tolerant landscaping. CDFW recommends the Project Applicant use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project Applicant should not plant, seed, or otherwise introduce non-native, invasive plant species to areas that are adjacent to and/or near native habitat areas. Accordingly, CDFW recommends the City restrict use of any species, particularly those listed 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2022). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

**Data.** CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] 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 [CNDDDB Online Field Survey Form](#)

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(CDFW 2022a). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022c). The City should ensure that the Project applicant has submitted data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The Project applicant should provide CDFW with confirmation of data submittal.

**Mitigation and Monitoring Reporting Plan.** CDFW recommends updating the MND's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation 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, could 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 Santa Fe Springs and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

### Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Santa Fe Springs 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 Santa Fe Springs 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 [Julisa.Portugal@wildlife.ca.gov](mailto:Julisa.Portugal@wildlife.ca.gov) or (562) 330-7563.

Sincerely,

DocuSigned by:  
  
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Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

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### References:

- [CDFWa] California Department of Fish and Wildlife. 2022. Submitting Data to the CNDDDB. Available at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- [CDFWb] California Department of Fish and Wildlife. 2022. Lake and Streambed Alteration Program. Available at: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>
- [CDFWc] California Department of Fish and Wildlife. 2022. Natural Communities - Submitting Information. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>
- [CAL-IPC] California Invasive Plant Council. 2022. The Cal-IPC Inventory. Available from: <https://www.cal-ipc.org/plants/inventory/>
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. U.S. Fish and Wildlife Service. FWS/OBS-79/31. Washington, D.C.
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.



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### Attachment A: Draft Mitigation and Monitoring Reporting Plan

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

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
<b>MM-BIO-1- LSA Notification</b>	<p>The LSA notification to CDFW shall provide the following information:</p> <ol style="list-style-type: none"> <li>1) A stream delineation in accordance with the U.S. Fish and Wildlife Service wetland definition adopted by CDFW (Cowardin <i>et al.</i> 1979);</li> <li>2) Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. Plant community names at the discharge site and downstream shall be provided based on vegetation association and/or alliance per the <a href="#">Manual of California Vegetation</a>, second edition;</li> <li>3) Discussion on whether the Project would result in impacts on the San Gabriel River downstream from the discharge site. Potential impacts such as changes to drainage pattern, erosion, and sedimentation shall be analyzed; and</li> <li>4) A hydrological study to show the impacts of the Project on the hydrology of the watercourse. The hydrology study shall include an analysis to determine if the water discharge will impact the current hydrologic flow (e.g., cfs, acre-feet) and hydraulics (e.g., velocity) on site and downstream. Additionally, the hydrological evaluation shall assess a sufficient range of storm events (e.g.,</li> </ol>	Prior to the Project-related ground-disturbing activities	City of Santa Fe Springs/ Project Applicant

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	100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate how water and sediment is conveyed under pre-Project and post-Project conditions.		
<b>REC-1- Hydrological Flow Analysis</b>	The MND should include an analysis of hydrological flow under wet and dry conditions. At a minimum, the analysis should evaluate a study reach from the discharge site to the southern portion of the San Gabriel River that may be impacted. The analysis should discuss the volume of water flow under pre-Project (i.e., baseline) conditions and post-Project conditions during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.	Prior to finalizing CEQA document	City of Santa Fe Springs/ Project Applicant
<b>REC-2 – Water Quality Analysis</b>	The MND should analyze and discuss the Project’s effect on the water quality of the existing water under pre-Project and post-Project conditions. An adequate analysis should provide the following information at a minimum: <ol style="list-style-type: none"> <li>1) A map depicting the discharge location and the southern portion of the San Gabriel River that may be impacted as a result of Project activities;</li> <li>2) Discussion of any inorganic/chemical compounds that may be associated with the treated groundwater (e.g., calcium, phosphate, nitrate);</li> <li>3) Discussion of any metals that may be associated with the treated groundwater (e.g., copper, zinc, lead, mercury, iron);</li> <li>4) Project effects on water quality (e.g., dissolved oxygen, turbidity, pH, and temperature) at the discharge site and downstream; and</li> <li>5) Any Project-related temporal, partial, or permanent</li> </ol>	Prior to finalizing CEQA document	City of Santa Fe Springs/ Project Applicant

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	effect on water quality at the discharge site and downstream.		
<b>REC 3 – CEQA Document for LSA</b>	<p>CDFW’s issuance of an 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 CEQA document from the City for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the Project’s CEQA 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. As such, CDFW recommends the City consider CDFW’s comments and revise the MND by incorporating the mitigation measures and revisions recommended in this letter into the Project’s final environmental document.</p> <p>To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.</p>	Prior to finalizing CEQA document	City of Santa Fe Springs/ Project Applicant
<b>REC 4- Landscaping</b>	<p>The Project proposes landscaping throughout the residential development. CDFW recommends the Project Applicant use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project Applicant should not plant, seed, or otherwise introduce non-native, invasive plant species to areas that are adjacent to and/or near native habitat areas. Accordingly, CDFW recommends the City restrict use of any species, particularly those listed ‘Moderate’ or ‘High’ by the <a href="#">California Invasive Plant Council</a>. These species are documented to have substantial and</p>	Prior to finalizing CEQA document	City of Santa Fe Springs/ Project Applicant

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	severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.		
<b>REC 5 – Data</b>	Please report any special status species detected by completing and submitting <a href="#">CNDDB Online Field Survey Form</a> . Information on special status native plant populations and sensitive natural communities, the <a href="#">Combined Rapid Assessment and Relevé Form</a> should be completed and submitted to CDFW’s Vegetation Classification and Mapping Program. The City should ensure that the Project Applicant has submitted the data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The Project Applicant should provide CDFW with confirmation of data submittal.	Prior to finalizing CEQA document	City of Santa Fe Springs/ Project Applicant