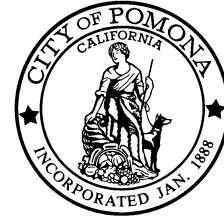


THE CITY OF
POMONA

Water Resources Department



April 24, 2023

**To: California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123**

Subject: Pedley Spreading Grounds Pond Enhancements Project SCH #2023030023

Attention: Erinn Wilson-Olgin, Environmental Program Manager I

Dear Ms. Wilson-Olgin:

The City of Pomona appreciates your comments on the California Environmental Quality Act (CEQA) Initial Study for the Pedley Spreading Grounds Pond Enhancement Project. In response to your comments, the City of Pomona has amended the mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) for the project to include:

- Crotch's Bumble Bee – Mitigation measure BR-5 has been added to include survey for Crotch's bumble bee between March 1 to September 1, development of an avoidance plan if the species is detected, and coordination with CDFW regarding appropriate permits if impacts cannot be feasibly avoided during project construction.
- Southern California legless lizard and San Diego woodrat – Mitigation measure BR-1 has been revised to: 1) specifically reference preconstruction focused surveys for Southern California legless lizard and San Diego woodrat, 2) note that if sensitive wildlife species are detected, the area will be flagged, photos taken, location mapped, and CDFW notified prior to any ground-disturbing activities, 3) detail procedures for non-invasive, passive relocation, and 4) detail procedures to follow in the event of the death or injury of a special status animal.
- Worker Training – Mitigation measure BR-3 has been revised to detail procedures if construction workers encounter a sensitive species during construction of the project (stop work, notify the project biologist, and resume work in the area of the find only if authorized by the project biologist).

- Rare Plants – Mitigation measure BR-1 has been revised to include season-appropriate, focused rare plant surveys for intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), lucky morning glory (*Calystegia felix*), white rabbit tobacco (*Pseudognaphalium leucocephalum*), and Sanford's arrowhead (*Sagittaria sanfordii*).
- Nesting Birds – The City is committed to limiting impacts to nesting birds at the project site and will implement mitigation measure BR-2. However, the use of the site for stormwater management generally limits the construction period to the non-rainy season. Additionally, the site is immediately adjacent to an elementary school and construction noise impacts on the school are a project consideration. Therefore, limitation of the construction period to outside of the bird nesting season may not be feasible at this project location.

The City understands and acknowledges that handling permits are required to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with project construction. Further, the City acknowledges that it will report any special status species detected during project construction by completing and submitting CNDDDB Field Survey Forms. The City will pay appropriate filing fees upon filing of the Notice of Determination for the project.

Thank you for your review of the CEQA document for this project. Additional questions regarding the project can be directed to Jorge Anaya, City of Pomona Water Resources Department, jorge.anaya@pomonaca.gov.

Sincerely,



Jorge D. Anaya
Senior Water Resources Engineer

cc: Chris Diggs, Water Resources Director
Julie Carver, Environmental Compliance Supervisor