



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Rd.
San Diego, CA 92123
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



November 22, 2023

Teresa Chan
Los Angeles County Department of Public Works
900 S Fremont Ave
Alhambra, CA 91803
tchan@dpw.lacounty.gov



Subject: Mitigated Negative Declaration for Former High Desert Hospital Site Demolition Project, SCH #2023100652, Los Angeles County Department of Public Works, Los Angeles County

Dear Teresa Chan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) for the Former High Desert Hospital Site Demolition Project (Project) proposed by the Los Angeles County Department of Public Works (LACDPW). 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 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 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 Summary

Objective: The County of Los Angeles, acting through the Department of Public Works (LACDPW), proposes to demolish the former High Desert Hospital and surrounding ancillary structures and construct two stormwater retention basins at the former High Desert Hospital site. All the facilities and structures, totaling 22 structures of more than 300,000 square feet of hospital, ancillary services, and miscellaneous ancillary structures (such as trailers, sheds, modular buildings, container, etc.), would be demolished and no buildings or structures would remain following the Project.

Location: The Project site is in northern Los Angeles County in the Antelope Valley region. It is within the City of Lancaster, which is approximately 70 miles north of downtown Los Angeles and immediately north of the City of Palmdale, at 44900 60th Street West, on the southeast corner of West Avenue I and 60th Street West.

Biological Setting: Vegetation at the 14.2-acre Project site consists of non-native grassland, invasive plants, landscaped trees, as well as other landscaped areas. One western Joshua tree (*Yucca brevifolia*) is located on site. Due to the developed/disturbed nature of the Project site, ongoing maintenance of landscaped areas, and the lack of native habitats, special status plant species are not expected to occur on site. Special status wildlife species, specifically Species of Special Concern (SSC), that may be found in the open space areas within and adjacent to the Project site include burrowing owl (*Athene cunicularia*) and northern California legless lizard (*Anniella pulchra*). Foraging and nesting habitat for many common birds may be found within the Project site. Lastly, foraging and roosting habitat for some bat species may also be found on the Project site.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Comment #1: Impacts to Burrowing Owl

Issue: Project activities may impact potential burrowing owl habitat.

Specific impact: A review of the California Natural Diversity Database (CNDDDB) indicates multiple occurrences of burrowing owl within the Project vicinity. Burrowing owls are also known to regularly occur throughout the Palmdale and Lancaster area.

Why impact would occur: The single general biological survey took place in August and December 2022. Identification of potential for burrowing owls during non-winter months, including the nesting season, may be missed. Burrowing owl protocol require

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multiple surveys conducted during different seasons. Without sufficient surveys, burrowing owls on site or adjacent to the site have the possibility to be missed.

Burrowing owls have been known to use highly degraded and marginal habitat where existing burrows or stem pipes are available. Nest and roost burrows of the burrowing owl are most commonly dug by ground squirrels, but they have also been known to use a variety of other species dens or holes, including coyote (Gervais et al., 2008). Impacts to burrowing owl could result from vegetation clearing and other ground disturbing activities. Project disturbance activities may result in crushing or filling of active owl burrows, causing the death or injury of adults, eggs, and young.

Evidence impact would be significant: The Project may result in direct and indirect burrowing owl mortality or injury; the disruption of natural burrowing owl breeding behavior; and loss of breeding, wintering and foraging habitat for the species. Project impacts would contribute to statewide population declines for burrowing owl. Within the Antelope Valley, the species persists in low densities and continues to experience significant direct and cumulative habitat loss.

Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.” Without appropriate take avoidance surveys prior to Project operations, including but not limited to ground and vegetation disturbing activities and rodent control activities, adverse impacts to burrowing owl may occur because species presence/absence has not been verified. In addition, burrowing owl qualifies for enhanced consideration afforded to species under CEQA, which can be shown to meet the criteria for listing as endangered, rare, or threatened (CEQA Guidelines, § 15380(d)).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Project proponent shall retain a qualified biologist to conduct focused surveys adhering to survey methods described in CDFW’s March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#) (CDFW 2012). Burrowing owl surveys shall be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. If burrowing owls are identified, the Project proponent shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. The Project proponent shall contact CDFW to develop appropriate

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mitigation/management procedures. The Project proponent shall submit a final Burrowing Owl Mitigation Plan to the LACDPW prior to the LACDPW issuing construction permits.

Mitigation Measure #2: The LACDPW shall set aside replacement habitat off site at a mitigation ratio no less than 2:1, approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other approved entity and include an appropriate endowment to provide for the long-term management of mitigation lands.

Mitigation Measure #3: In order to limit the biomagnification of poisons in burrowing owls and their prey, LACDPW shall require avoidance of any rodenticides and second-generation anticoagulant rodenticides during facility operations.

Comment #2: Impacts to California Species of Special Concern

Issue: A review of CNDDDB indicates multiple occurrences of the northern California legless lizard (*Anniella pulchra*) within the Project vicinity.

Specific impact: Project ground disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. In addition, the Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.

Why impact would occur: The vegetation present in and adjacent to the Project site may provide cover and habitat for wildlife, especially small reptiles. Although the northern California legless lizard was not observed, this species has been recorded on CNDDDB within a mile of the Project site. Project implementation includes grading, vegetation clearing, and other activities that may result in direct mortality, population declines, or local extirpation of Special Status reptile species. The mitigation measures proposed in the MND do not consider reptile species being present during Project activities. Wildlife may be trapped or crushed under structures. Large equipment, equipment and material staging, and vehicle and foot traffic could trample or bury wildlife. Impacts to the northern California legless lizard are more likely to occur because this cryptic species is less mobile and seeks refuge under structures.

Evidence impact would be significant: A [California Species of Special Concern](#) is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- 1) if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- 2) if the species is listed as threatened or endangered under Endangered Species Act (ESA)-, but not CESA-, threatened, or endangered;

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- 3) if the species meets the State definition of threatened or endangered but has not formally been listed;
- 4) if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- 5) if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA-threatened or -endangered status (CDFW 2023a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). The MND does not provide mitigation for potential impacts on SSC.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #4- Biological Monitor: Due to the high likelihood that northern California legless lizard may occur on site, LACDWP shall assume presence of the species and provide compensatory mitigation of suitable habitat at a mitigation ratio equal or greater to 2:1.

Additional Recommendations

Recommendation #1 – Western Joshua tree: CDFW recommends that the MND be amended to discuss and analyze, in detail, impacts to the western Joshua Tree individual. If take will occur, the MND should specify whether incidental take for western Joshua tree will be obtained through CESA or through the Western Joshua Tree Conservation Act. If an ITP through CESA will be pursued, then the amended MND should also include details of compensatory mitigation, including land protection instruments and in-perpetuity funding. Additional information pertaining to western Joshua trees and permitting is provided on the CDFW's website (CDFW 2023c).

Recommendation #2 – Nesting Birds: CDFW recommends removing the language with a ~~strike through~~ and adding the underlined language:

“In accordance with the Migratory Bird Treaty Act, demolition (or construction-related activities) that have the potential to impact nesting birds (e.g., tree and vegetation removal, work near or in trees/certain structures, tree disturbance, pruning, etc.), should be scheduled to avoid nesting bird season (generally between February 1st – August 31st). Where avoidance is not feasible, it would be recommended that a qualified biologist complete a nesting bird survey at least 1-week prior to construction-related activities at the Project site to confirm that no active nests, or nesting birds are present. Surveys for active nests must be conducted by a qualified

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biologist to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) should be established around such active nests. A minimum 100-foot no-disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the LACDPW.”

It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss (e.g. PDF-6). Additional mitigation is necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the LACDPW desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Recommendation #3 – Bats: CDFW recommends removing the language below with a ~~strikethrough~~ and adding the underlined language:

“Pursuant to the Endangered Species Act, demolition (or construction related activities) that have the potential to impact roosting bats (e.g., tree and vegetation removal, work near or in trees/certain structures, tree disturbance, pruning, etc.), should be scheduled to avoid mating season (generally March 1 – July 31). Where avoidance is not feasible, it would be recommended that a qualified biologist complete a bat survey at least 1-week prior to construction-related activities at the Project site to confirm that no roosting bats are present. A qualified bat specialist should conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to the LACDPW. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the project on bats and include species-specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of

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robust mitigation measures by a qualified bat specialist should be completed and submitted to the LACDPW prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If roosts are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.”

It should be noted that the temporary halt of Project activities within buffers during roosting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss (e.g. PDF-7). Additional mitigation is necessary to compensate for the permanent removal of roosting/foraging habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the LACDPW desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence of an SSC and would further increase with the occurrence of a CESA-listed species.

Recommendation #4 – Environmental 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)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2023d). 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 2023e).

Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist the LACDPW of Lancaster in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

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Sincerely,

DocuSigned by:

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David Mayer
Environmental Program Manager
South Coast Region

ec: CDFW
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
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CEQA Program Coordinator – Sacramento

OPR
State Clearinghouse – State.Clearinghouse@opr.ca.gov

References:

- [CDFW] California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. Available at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>
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- [CDFW] California Department of Fish and Wildlife. 2023c. Western Joshua tree Conservation Efforts and Permitting. Available at:
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<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>
- Gervais, J.A., Rosenberg, D.K., and Comrack, L.A. Burrowing Owl (*Athene cunicularia*). Shuford, W.D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.



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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into the Project's environmental document.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- Burrowing Owl	The Project proponent shall retain a qualified biologist to conduct focused surveys adhering to survey methods described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation (CDFW 2012). Burrowing owl surveys shall be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. If burrowing owls are identified, the Project proponent shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. The Project proponent shall contact CDFW to develop appropriate mitigation/management procedures. The Project proponent shall submit a final Burrowing Owl Mitigation Plan to the LACDPW prior to the LACDPW issuing		

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	construction permits.		
MM-BIO-2- Burrowing Owl	The LACDPW shall set aside replacement habitat off site at a mitigation ratio no less than 2:1, approved by CDFW. Replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other approved entity and include an appropriate endowment to provide for the long-term management of mitigation lands.	Prior to finalizing CEQA document	LACDPW/Project Applicant
MM-BIO-3- Burrowing Owl	In order to limit the biomagnification of poisons in burrowing owls and their prey, LACDPW shall require avoidance of any rodenticides and second-generation anticoagulant rodenticides during facility operations.	Prior to finalizing CEQA document	LACDPW/Project Applicant
MM-BIO-4- SCC Mitigation	Due to the high likelihood that northern California legless lizard may occur on site, LACDWP shall assume presence of the species and provide compensatory mitigation a mitigation ratio equal or greater to 2:1.	Prior to finalizing CEQA document	LACDPW/Project Applicant
REC-1- Western Joshua Tree	CDFW recommends that the MND be amended to discuss and analyze, in detail, impacts to the western Joshua Tree individual. If take will occur, the MND should specify whether incidental take for western Joshua tree will be obtained through CESA or through the Western Joshua Tree Conservation Act. If an ITP through CESA will be pursued, then the amended MND should also include details of compensatory mitigation, including land protection instruments and in-perpetuity funding. Additional information pertaining to western Joshua trees and permitting is provided on the CDFW's website (CDFW 2023c).	Prior to finalizing CEQA document	LACDPW/Project Applicant
REC-2- Nesting Birds	CDFW recommends removing the language with a strikethrough and adding the <u>underlined</u> language:	Prior to finalizing CEQA document	LACDPW/Project Applicant

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	<p>“In accordance with the Migratory Bird Treaty Act, demolition (or construction-related activities) that have the potential to impact nesting birds (e.g., tree and vegetation removal, work near or in trees/certain structures, tree disturbance, pruning, etc.), should be scheduled to avoid nesting bird season (generally between February 1st – August 31st). Where avoidance is not feasible, it would be recommended that a qualified biologist complete a nesting bird survey at least 1-week prior to construction-related activities at the Project site to confirm that no active nests, or nesting birds are present. <u>Survey for active nests must be conducted by a qualified biologist to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) should be established around such active nests. A minimum 100-foot no- disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the LACDPW.”</u></p>		
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	<p>It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss (e.g. PDF-6). Additional mitigation is necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the LACDPW desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.</p>		
<p>REC-3- Bats</p>	<p>CDFW recommends removing the language with a strike through and adding the <u>underlined</u> language:</p> <p>“Pursuant to the Endangered Species Act, demolition (or construction related activities) that have the potential to impact roosting bats (e.g., tree and vegetation removal, work near or in trees/certain structures, tree disturbance, pruning, etc.), should be scheduled to avoid mating season (generally March 1 – July 31). Where avoidance is not feasible, it would be recommended that a qualified biologist complete a bat survey at least 1-week prior to construction-related activities at the Project site to confirm that no roosting bats are present. <u>A qualified bat specialist should conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify</u></p>	<p>Prior to finalizing CEQA document</p>	<p>LACDPW/Project Applicant</p>

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	<p><u>potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized to maximize detection of bat species and to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to the LACDPW. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the LACDPW prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If roosts are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.”</u></p> <p>It should be noted that the temporary halt of Project activities within buffers during roosting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss (e.g. PDF-7). Additional mitigation is necessary to compensate for the permanent removal of roosting habitat within the Project site based on acreage of impact, vegetation composition, and status of the wildlife species. A minimum ratio of 2:1 is recommended for impacts to occupied habitat. CDFW is available should the</p>		
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	<p>LACDPW desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the status of the species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.</p>		
<p>REC-4- Environmental Data</p>	<p>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)]. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms (CDFW 2023c). 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 2023d).</p>	<p>Prior to finalizing CEQA document</p>	<p>LACDPW/Project Applicant</p>