



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 16, 2024

Governor's Office of Planning & Research

**Feb 16 2024**

**STATE CLEARINGHOUSE**

Jocelyn Swain  
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[JSwain@cityoflancasterca.org](mailto:JSwain@cityoflancasterca.org)

**SUBJECT: TENTATIVE TRACT MAP NO. 62321 (PROJECT); MITIGATED NEGATIVE DECLARATION (MND); SCH #2024010716**

Dear Jocelyn Swain:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the City of Lancaster (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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 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

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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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.

## **Project Description Summary**

**Proponent:** Rodeo Credit Enterprises, LLC

**Objective:** The Project proposes to subdivide approximately 20 gross acres into 78 single family residential lots, which range in size from 7,020 square feet to 11,809 square feet. Access to the subdivision would be from Lancaster Boulevard and 25<sup>th</sup> Street East. Roads within the subdivision would be available to the public.

**Location:** The 20-acre Project site is located on the northeast corner of East Lancaster Boulevard and 25<sup>th</sup> Street East in the City. The Project site is bound by a mobile home park to the north, vacant land to the east, 25<sup>th</sup> Street East to the west, and East Lancaster Boulevard to the south. Beyond the immediate borders of the Project site lies several residential subdivisions and Tierra Bonita Park. The Assessor’s Parcel Numbers associated with the Project site include 3150-024-008, 3150-024-009, 3150-024-019, 3150-024-020, and 3150-024-021.

**Biological Setting:** The Project site is currently vacant and undeveloped. Signs of litter, vegetation clearing, grading, and off-road activity are exhibited throughout the entire Project site as well as on the vacant land to the east.

A general biological survey was conducted on November 11, 2004, with findings compiled in a Biological Resources Report (BRR). In addition, an updated general biological survey was conducted on July 28, 2022; findings from the updated survey were discussed in a letter addressed to the Project proponent. Findings from both surveys characterize the Project site as a graded field with small patches of non-native grass and minimal shrubs. The BRR noted that exotic trees were present along the perimeter of the Project site, which have since been removed. No special-status plant species were observed during both surveys. An earthen drainage with vegetation currently exists along the eastern boundary of the Project site. A southern drainage that was described in the BRR has also been removed from the Project site. About wildlife species, no special-status wildlife species were observed during the surveys. Common wildlife species that were observed consist of the house finch (*Haemorhous mexicanus*), white-crowned sparrow (*Zonotrichia leucophrys*), Northern mockingbird (*Mimus polyglottos*), California horned lark (*Eremophila alpestris actia*), and several California ground squirrel (*Otospermophilus beecheyi*).

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Burrowing owls (*Athene cunicularia*; California Species of Special Concern (SSC)) were not detected during the surveys.

## Comments and Recommendations

CDFW offers additional recommendations below to assist the City in adequately identifying the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. 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: Impact on Burrowing Owl

**Issue:** The Project may impact burrowing owl.

**Specific impacts:** While burrowing owls were not detected during the conducted surveys, California ground squirrel burrows on site provide suitable habitat for this species. Vegetation removal and grading activities will result in permanent loss of suitable overwintering habitat for burrowing owls. Project construction activities (e.g., equipment staging, mobilization, and grading) may also disrupt natural burrowing owl behavior.

**Why impact would occur:** According to Antelope Valley Regional Conservation Investment Strategy (AVRCIS), suitable habitat for burrowing owl encompasses a variety of landscapes throughout the region, but it is imperative that burrows, typically from small mammals (e.g., California ground squirrel), already exist to allow burrowing owl to occupy them (DCMA 2021). Although the MND states that, “[N]o habitat was present for sensitive wildlife species including burrowing owl...”, numerous California ground squirrel burrows were observed within the Project site during both surveys (page 19). Additionally, observations of burrowing owl from 2004 and 2005 have been recorded through [California Natural Diversity Database](#) within a mile of the Project site (CDFW 2024a). Burrowing owls may use the burrows throughout the Project site as overwintering habitat. The MND does not provide any avoidance/minimization or mitigation measures specific to this SSC. Without any surveys such as a preconstruction survey, burrow owls may go undetected within the Project site. Heavy machinery utilized during construction may result in death or injury of undetected burrowing owl.

**Evidence impacts would be significant:** 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

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take avoidance surveys prior to Project operations including, but not limited to, ground and vegetation disturbing 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, that can be shown to meet the criteria for listing as endangered, rare, or threatened (CEQA Guidelines, § 15380(d)). 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.

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

**Mitigation Measure #1: Burrowing Owl Surveys** – To reduce impacts to burrowing owl, the Project proponent shall retain a qualified biologist to conduct protocol-level surveys adhering to CDFW's [Staff Report on Burrowing Owl Mitigation](#) (CDFW 2012). All survey efforts shall be conducted prior to any Project activities that could result in habitat disturbance to soil, vegetation, or other sheltering habitat for burrowing owls. Burrowing owl protocol surveys shall be conducted on the Project site and within 500 feet 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 variations 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 an occupied burrow or burrowing owl is found within the development footprint, the biologist 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 and a final Burrowing Owl Mitigation Plan shall be submitted to the City and CDFW for review and approval prior to Project activities.

**Mitigation Measure #2: Burrowing Owl Compensatory Mitigation** – If the Project will impact burrowing owl and associated habitat, the Project proponent shall offset impacts on habitat supporting an SSC at a minimum of 2:1 to ensure no net loss of burrowing owl habitat. The Project proponent shall set aside comparable replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.

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## **Comment #2: Impacts on Drainage**

**Issue:** The Project may impact the on-site earthen drainage.

**Specific impacts:** Project construction and ground-disturbing activities (e.g., equipment staging, mobilization, and grading) may result in fugitive dust and runoff entering the drainage.

**Why impacts would occur:** A drainage was observed in both surveys along the eastern boundary of the Project site. According to the MND, the drainage would not be part of the Project and would be part of an easement dedicated to the City. Although a Project drawing is provided in the MND, the Project description does not provide information pertaining to how the City intends to avoid impacts to the drainage. Without proper avoidance measures in place, fugitive dust and debris from construction activities may enter the drainage. Additionally, without an adequate setback, grading activities may result in encroachment upon the bed, bank, or channel of the drainage. Impacts to the drainage would be subject to Section 1602 Lake and Streambed Alteration Agreement (LSA).

**Evidence impacts would be significant:** CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which include 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:

- 1) Divert or obstruct the natural flow of any river, stream, or lake;
- 2) Change the bed, channel, or bank of any river, stream, or lake;
- 3) Use material from any river, stream, or lake; or
- 4) Deposit or dispose of material into any river, stream, or lake.

The Project may adversely affect the existing water feature directly east of the Project site. 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.

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

**Recommendation #1: MND Revision** – The MND should be revised to provide a discussion of how impacts to the drainage will be avoided, minimized, and/or mitigated. Best management practices to limit any fugitive dust or construction material from entering the drainage should also be included. The MND should also discuss how human disturbance to the drainage will be limited once the residential lots are built out and occupied (i.e., signage, fencing, etc.).

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**Mitigation Measure #3: LSA** – The Project proponent shall notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to obtaining a grading permit. The LSA Notification shall include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity. The hydrology report shall also include a hydrological evaluation of any potential scour or erosion at the Project site due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. The Project proponent shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The Project proponent shall also provide compensatory mitigation at no less than 2:1 for any impacted stream and associated natural community, or at a ratio acceptable to CDFW. Please visit CDFW’s [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2024b).

### **Additional Recommendations**

Southern Drainage. The BRR states that a water ditch occurs along the southern and eastern boundaries of the Project site. It is noted in the updated letter that the southern drainage that was described in the BRR was no longer present. The MND should be amended to provide a discussion pertaining to the southern drainage, describing when and why the southern drainage was removed, and whether the action was undertaken with appropriate wetland permits.

Nesting Birds and Raptors. CDFW recommends the City revise Mitigation Measure 2 by incorporating the underlined language and removing the language with strikethrough:

A nesting bird and raptor survey shall be conducted by a qualified biologist within 14 7 days prior to the start of any construction/ground disturbing activities. The qualified biologist shall survey all suitable nesting habitat within a 500-foot radius of the Project site ~~the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area~~. If no active bird nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures shall be required. If Project activities are delayed or suspended for more than 7 days during the breeding season, the nesting bird and raptor survey shall be repeated. If an active bird nest is found, the species shall be identified, and a “no disturbance” buffer shall be established around the active nest. The size of the “no disturbance” buffer shall be increased or decreased based on the judgement of the qualified biologist and level of activity and sensitivity of the species. At a minimum, the buffer shall be at least 500 feet around active raptor nests and ~~50~~ 100 feet around nests of migratory bird species. Personnel working on the Project, including all contractors working on site, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no disturbance buffers. The qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the “no-disturbance” buffer disturb the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities

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within the “no-disturbance” buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

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 2024c). 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 2024d).

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project’s proposed Biological Resources Mitigation Measures and condition the 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 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). 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).

### **Environmental Document Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing 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 in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City 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.

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Sincerely,

DocuSigned by:



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Victoria Tang  
Environmental Program Manager  
South Coast Region

ec: California Department of Fish and Wildlife

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**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>

[CDFW] California Department of Fish and Wildlife. 2024a. California Natural Diversity Database. Available at: <https://wildlife.ca.gov/Data/CNDDDB>

[CDFW] California Department of Fish and Wildlife. 2024b. Lake And streambed Alteration Program. Available at: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

[CDFW] California Department of Fish and Wildlife. 2024c. Submitting Data to the CNDDDB. Available at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.



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[CDFW] California Department of Fish and Wildlife. 2024d. Combined Rapid Assessment and Releve Form. Available at:

<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

[DCMA] Desert and Mountain Conservation Authority. 2021. Antelope Valley Regional Conservation Investment Strategy. Available at:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=197234>

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**Attachment A:**

**CDFW Draft Mitigation, Monitoring, and Reporting Plan and Associated Recommendations**

Recommendation	Mitigation Measures	Timing	Responsible Party
<p><b>MM-BIO-1 – Burrowing Owl Surveys</b></p>	<p>To reduce impacts to burrowing owl, the Project proponent shall retain a qualified biologist to conduct protocol-level surveys adhering to CDFW’s Staff Report on Burrowing Owl Mitigation. All survey efforts shall be conducted prior to any Project activities that could result in habitat disturbance to soil, vegetation, or other sheltering habitat for burrowing owls. Burrowing owl protocol surveys shall be conducted on the Project site and within 500 feet 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 variations 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.</p> <p>If an occupied burrow or burrowing owl is found within the development footprint, the biologist 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</p>	<p>Prior to Project activities</p>	<p>Project proponent/ Qualified Biologist</p>

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	mitigation/management procedures and a final Burrowing Owl Mitigation Plan shall be submitted to the City and CDFW for review and approval prior to Project activities.		
<b>MM-BIO-2- Burrowing Owl Compensatory Mitigation</b>	If the Project will impact burrowing owl and associated habitat, the Project proponent shall offset impacts on habitat supporting an SSC at a minimum of 2:1 to ensure no net loss of burrowing owl habitat. The Project proponent shall set aside comparable replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.	Prior to Project activities	Project proponent
<b>MM-BIO-3- LSA</b>	The Project proponent shall notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to obtaining a grading permit. The LSA Notification shall include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity. The hydrology report shall also include a hydrological evaluation of any potential scour or erosion at the Project site due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. The Project proponent shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The Project proponent shall also provide compensatory mitigation at no less than 2:1 for any impacted stream and associated natural community, or at a ratio acceptable to CDFW.	Prior to Project activities	Project Proponent

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<p><b>MM-BIO-4- Nesting Bird and Raptor Survey</b></p>	<p>A nesting bird and raptor survey shall be conducted by a qualified biologist within 7 days prior to the start of any construction/ground disturbing activities. The qualified biologist shall survey all suitable nesting habitat within a 500-foot radius of the Project site. If no active bird nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures shall be required. If Project activities are delayed or suspended for more than 7 days during the breeding season, the nesting bird and raptor survey shall be repeated. If an active bird nest is found, the species shall be identified, and a “no disturbance” buffer shall be established around the active nest. The size of the “no disturbance” buffer shall be increased or decreased based on the judgement of the qualified biologist and level of activity and sensitivity of the species. At a minimum, the buffer shall be at least 500 feet around active raptor nests and 100 feet around nests of migratory bird species. Personnel working on the Project, including all contractors working on site, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no disturbance buffers. The qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the “no-disturbance” buffer disturb the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities</p>	<p>Prior to Project activities</p>	<p>Project Proponent/ Qualified Biologist</p>
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	within the “no-disturbance” buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.		
<b>REC-1- MND Revision</b>	The MND should be revised to provide a discussion of how impacts to the drainage will be avoided, minimized, and/or mitigated. Best management practices to limit any fugitive dust or construction material from entering the drainage should also be included. The MND should also discuss how human disturbance to the drainage will be limited once the residential lots are built out and occupied (i.e., signage, fencing, etc.).	Prior to adoption of MND	City
<b>REC-2 – Southern Drainage MND Revision</b>	The MND should be revised to provide a discussion pertaining to the southern drainage. The discussion should describe when the southern drainage was removed and the primary cause for removal of the southern drainage.	Prior to adoption of MND	City
<b>REC-2 – Environmental Data</b>	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. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms. 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.	Prior to Project activities	Qualified Biologist