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August 25, 2025

Clare Lin
City of Sierra Madre
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**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GINKGO
STONEHOUSE RESIDENTIAL PROJECT, SCH NO. 2023100084, LOS ANGELES
COUNTY, CA**

Dear Clare Lin:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the city of Sierra Madre (City; Lead Agency) for the Ginkgo Stonehouse Residential Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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, CDFW appreciates 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 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, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 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 fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

¹ 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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regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's 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 law² of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Ginkgo Stonehouse, LLC

Objective: The Project proposes the development of nine single-family residential detached lots. Approximately four of the nine acres within the Project site are proposed as a non-buildable area that would prohibit the construction of vertical structures but would allow for landscaping and passive open space. The site currently has four existing residential structures and accessory infrastructure that would be demolished prior to grading activities. Following grading activities, residential building pads with associated infrastructure would be constructed. Additionally, a new private street with a cul-de-sac, driveway/fire access road, retaining walls, swales, and utility connections to East Grand View Avenue would be installed. Three custom homes would be built on separate residential building pads and would include a driveway, walkways, drainage system, stormwater biofiltration system, and connections for all utilities. A new Homeowner's Association would maintain the private street, the development's associated infrastructure, and each individual lot biofiltration system.

Alternatives: The City provides two alternatives in the DEIR in addition to the proposed Project. Alternative 1: No Project, Current General Plan and Zoning would result in no new development on the Project site in the immediate future. The site would remain in its current condition for an unknown period of time and would retain the four existing single-family residential buildings, three sheds, and two gazebos. Under Alternative 2: Reduced Lot Size Design Alternative, the Project site would construct nine residential detached lots as proposed in the Project; however, Lots 1 through 4 would be reduced in size and condensed toward the south end of the site and situated close to East Grand View Avenue. In this alternative, the grading footprint would be reduced, no additional driveway and fire access road would be constructed, and the fuel modification and brush management requirements may be reduced within the non-buildable area for individual lot owners.

Location: The Project site is approximately 9 acres located at 935 East Grand View Avenue in the City, Los Angeles County. The site is bound by the San Gabriel Mountains to the north, Liliano Drive and Stonehouse Road to the east, East Grand

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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View Avenue to the south, and Acacia Street to the west. The Assessor's Parcel Numbers associated with the Project site is 5764-001-017 and 5764-001-018.

Biological Setting: The Project site is located at the base of the San Gabriel Mountains within the northern region of Los Angeles County. The topography of the Project site is a mix of flat land and hillside, bordered by residential development to the east, west, and south. A Biological Technical Report (BTR) was provided for the Project, which compiled findings from a general survey, bat focused surveys, an arborist report, 2024 breeding season surveys for coastal California gnatcatcher (*Poliioptila californica californica*; Endangered Species Act (ESA)-listed threatened and California Species of Special Concern (SSC)), and 2024 focused surveys for Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered). No Crotch's bumble bee or coastal California gnatcatcher were identified during their respective surveys. During the bat surveys, the yuma myotis (*Myotis yumanensis*), California myotis (*Myotis californicus*), canyon bat (*Parastrellus hesperus*), big brown bat (*Eptesicus fuscus*), and Mexican free-tailed bat (*Tadarida brasiliensis*) were identified.

A total of 71 plant species were observed within the Project site during the general biological survey and rare plant survey. The vegetation on site encompasses 0.09 acre of arroyo willow (*Salix lasiolepis*) thickets, 2.39 acres of coastal sage scrub (*Artemisia californica*), 1.62 acres of eucalyptus (*Eucalyptus* spp.) grove, and 0.66 acre of mixed coast live oak (*Quercus agrifolia*) woodland. Additionally, no streams or water features were identified throughout the Project site.

A total of 27 wildlife species or signs were observed during field surveys. Species that are of potential concern for the Project include, but are not limited to, mountain lion (*Puma concolor*; CESA candidate endangered), Crotch's bumble bee, coastal California gnatcatcher, western mastiff bat (*Eumops perotis*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), western red bat (*Lasiurus frantzii*; SSC), and raptors and migratory birds. The DEIR incorporates four mitigation measures that outline a general preconstruction survey, tree replacement plan, nesting bird and raptor survey, and a preconstruction roosting bat survey.

Project Timeline: Project construction is anticipated to consist of demolition, site preparation, grading, building construction, paving, and architectural coating over the span of three years.

Project History: CDFW previously reviewed the Notice of Preparation (NOP) and provided a comment letter to the City on November 8, 2023. Comments in the NOP addressed mountain lion, western mastiff bat, rare plants, southern California legless lizard, and nesting and raptors.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially

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significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Alternative 2: Reduced Lot Size Design Alternative

Issue: CDFW supports Alternative 2: Reduced Lot Size Design Alternative, as the Project's current design would result in greater adverse impacts on the flora and fauna within the non-buildable area of the Project site.

Specific impact: The Project's current design will have a larger grading footprint and encroachment upon the natural habitat (i.e., coastal sage scrub) in the northern portion of the Project site. By implementing Alternative 2, the reduced development footprint would consequently decrease the loss of foraging and nesting habitat for special-status species.

Why impact would occur: The Project site supports at least five vegetation communities and is connected to the San Gabriel Mountains. A total of 98 flora and fauna were observed during general biological field surveys within the Project site. Focused surveys identified five different bat species and three different bee species. Based on these findings alone, it is reasonable to conclude that the Project site provides biological value to a wide variety of wildlife in the area. Under Alternative 2, the same number of residential units would be proposed as the current Project design, but the layout would be closer to East Grand View Avenue where development currently exist. This design would allow for less encroachment into the non-buildable area due to the removal of the additional driveway and fire access road, smaller grading footprint, and less fuel modification activities within the non-buildable area. Additionally, moving development away from the hillside and leaving as much coastal sage scrub untouched would allow for more suitable habitat for species such as coastal California gnatcatcher and Crotch's bumble bee. With more available habitat, nesting and foraging opportunities for wildlife would remain consistent with current site conditions.

Evidence impact would be significant: Section 15126.6(e)(2) of the State CEQA Guidelines requires that an EIR identify an environmentally superior alternative among the alternatives evaluated. The Alternative 2 is an environmentally superior alternative, compared to the proposed Project, that would reduce the impacts to natural habitat that supports CESA- and ESA-listed species.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 1: Adoption of Alternative 2 - CDFW strongly recommends the City and Project proponent moves forward with the adoption of Alternative 2: Reduced Lot Size Design Alternative for the Project.

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COMMENT # 2: Fuel Modification Zone

Issue: CDFW is concerned that the DEIR does not adequately address, analyze, and mitigate fuel modification activities in relation to biological resources within the Project site.

Specific impact: The DEIR does not clearly provide compensatory mitigation to offset the loss of habitat within the fuel modification zone. Impacts to native vegetation communities to create defensible space should be treated as permanent impacts to biological resources and mitigated as such.

Why impact would occur: The DEIR states that “[M]aintenance within the non-buildable areas, such as brush management/fuel modification, would be the responsibility of the individual lot owner” (pg. 1-3). The DEIR classified fuel modification as part of maintenance but does not discuss what the fuel modification zones would be for each residential lot and what specific activities would be associated within the fuel modification zones. Additionally, the DEIR does not provide an impact analysis on what vegetative communities would be impacted by fuel modification activities. Moreover, no impact analysis was provided on how fuel modification activities would impact wildlife such as avian species. It is important to note that fuel modification activities constitute as ongoing impacts that will perpetually impact the plant communities and the species that depend on these natural communities. Indirect effects (e.g., noise) from fuel modification activities may also have an impact on wildlife that utilize the open space that abuts the Project site. Given that fuel modification activities will result in ongoing direct and indirect impacts to natural resources within the Project site and surrounding open space, compensatory mitigation should be provided.

Evidence impact would be significant: Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The CESA and NPPA provide additional protection for such species, including take prohibitions (Fish & G. Code, § 2050 et seq.; Fish & G. Code, § 1908). Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA locally sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, 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 or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 2: Fuel Modification Impacts – The City should revise the DEIR to include a Fire Management Plan for public review. With respect to defensible space,

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the Fire Management Plan should fully describe and identify the location, acreage, and composition of defensible space within the Project site. The City through its planning processes, should ensure that defensible space is provided and accounted for within proposed development areas, and not included in any conservation areas. Additionally, the Fire Management Plan should outline compensatory mitigation to offset the permanent loss of natural vegetation.

Mitigation Measure #1: Fuel Modification Compensatory Mitigation - The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone.

COMMENT # 3: Impacts on Mountain Lion

Issue: The Project may impact mountain lion through habitat loss and an increase of human interaction. The DEIR does not provide avoidance, or minimization measures specific to mountain lion.

Specific impact: Project implementation may directly impact mountain lion habitat through vegetation removal, grading, general construction activities, and expose lions to increased human presence within the residential development. Indirect impacts include increased levels of noise, vibration, sound, and lighting.

Why impact would occur: The northern portion of the Project site allows for wildlife to enter the site from the San Gabriel Mountains. According to the BTR, there is a high potential for mountain lion presence based on observed evidence that the northern portion of the site is used as a foraging site (scat, foraged plants, trails to food sources) for larger mammals) for multiple mammal species including mule deer, coyotes and black bears (pg. 23). During surveys, mule deer (*Odocoileus hemionus*) were directly observed within the Project site. Mule deer provide the primary source of food for mountain lions in southern California, making up a significant proportion of their diet (CDFW 2025a). With the residential development footprint abutting the San Gabriel Mountains, it is likely that mule deer will take advantage of the residence as refugia to avoid or limit their potential interactions with predators. Although mountain lions seek to limit interactions with humans, they likely will not be completely deterred from activity within the development. It is entirely possible that lions may continue to frequent the area in seeking prey. Furthermore, it is noted in the DEIR that mountain lion sightings have been made in the surrounding neighborhoods (pg. 5.4-8). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result of the incursion of humans into historically wildland areas, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020) and areas of high human activity have lower occupancy of rare carnivores.

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Evidence impact may be significant: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CBD 2019). As a CESA candidate species, the mountain lion in southern California is granted the full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). As to CEQA, the status of mountain lion as a threatened species under CESA qualifies it as an endangered, rare, or threatened species under CEQA (CEQA Guidelines, §15380). No mitigation has been proposed for impacts on mountain lion from the Project from the standpoint of habitat loss and encroachment, as well as anthropogenic impacts discussed above.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #3: Wildlife Fencing – The City and Project proponent should consider placing a wildlife exclusion fence around the perimeter of the residential community to exclude mule deer and other potential prey for mountain lion from entering the residences. Wildlife fencing should be at least 12-feet tall with an overhang discouraging jumping. Fences should be made from sturdy material with gaps no larger than 4-inches.

Recommendation #4: Human-Wildlife Interaction - To prevent human-wildlife conflicts within the Project site, the Project proponent should incorporate the following elements into the design of the residential development, as well as management and maintenance of the residences in perpetuity. These elements should be recorded in any HOA documents:

1. Never feed deer or other wildlife; it is illegal to feed deer and other big game in California and it will attract mountain lions (Cal. Code Regs., tit. 14 § 251.3);
2. Deer-resistant/detering landscape design, planting species that are less palatable to mule deer;
3. Trim bushes and shrubs to 2 to 3-feet above the ground to reduce hiding places for mountain lions and keep brush trimmed low; and,
4. Install motion-sensitive lighting and consider installing additional deterrents around the residential development

Mitigation Measure #2: Mountain Lion Encounters – If a mountain lion is encountered during pre-construction surveys or construction activities, the qualified biologist and all other worker personnel shall immediately leave the work area. The qualified biologist shall immediately contact CDFW, and the animal shall be allowed to passively move out of harm's way to an area that is unaffected by the Project. Project

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activities the Project site shall not recommence in the work area until the following day and only with coordination and communication with CDFW prior to recommencing project activities.

Mitigation Measure #3: Incidental Take Permit - If take or adverse impacts to mountain lion cannot be avoided, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq.). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

Mitigation Measure #4: Rodenticides – To eliminate potential mortality, the Project proponent shall prohibit use of any and all rodenticides within the Project site in perpetuity. The Project proponent shall inform future homeowners that no rodenticides shall be used on site at any time as a condition of home build or purchase.

COMMENT # 4: Impacts to Crotch's Bumble Bee

Issue: The Project may impact suitable nesting and foraging habitat for Crotch's bumble bee. The DEIR does not include measures to ensure impacts to the species are appropriately mitigated.

Specific impact: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: The Project site contains vegetation such as coastal sage scrub that provides nesting and foraging opportunities for Crotch's bumble bee. According to BTR, three other *Bombus* bee species were identified during the 2024 habitat assessment and focused surveys for Crotch's bumble bee. Additionally, the site provides highly suitable ecological conditions for Crotch's bumble bee habitat with nectar and pollen from scrub species (pg. 17). The City acknowledges the high potential for Crotch's bumble bee to be present but does not incorporate any species-specific measures in the DEIR since the species was not identified during the 2024 focused surveys. While a general pre-construction survey is outlined in Mitigation Measure BIO-1, the level of detail and biological expertise in accurately identifying a Crotch's bumble bee warrants protocol-level surveys by a CDFW-approved biologist. Additionally, bumble bees are known to move their nests sites each year; therefore, focused surveys for this CESA candidate species should be conducted each year that Project activities would occur (CDFW 2023). Although findings from 2024 focused surveys failed to detect Crotch's bumble bee one year, the City or Project proponent cannot guarantee that the Project won't impact Crotch's bumble bee in subsequent years during construction activities without adequate surveys to confirm presence or absence. Without subsequent focused surveys, the Project's ground and vegetation disturbance

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could result in incidental take of a CESA candidate species and significant impacts to the species such as changes in foraging behavior, burrow collapse, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

Furthermore, surveys to determine presence or absence of CESA-listed or candidate species pose the risk of incidental take of the respective species. Given that incidental take may occur, surveyors must be qualified to conduct surveys for Crotch's bumble bee. Project proponents applying for a permit should submit a resume of the proposed surveyor (designated biologist) with their research MOU or ITP application for review by CDFW. Given the level of expertise needed for taxonomic identification, it may be acceptable for a less experienced surveyor to confirm the identifications of the bumble bees encountered during surveys by sending photo vouchers to an experienced taxonomist. If this is the case, please also provide the resume of the taxonomist in addition to the qualified biologist (CDFW 2023). CDFW would appreciate future coordination prior to focused surveys to review and approve survey methodology and surveyors.

Evidence impact would be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the population size and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a State Ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#)³. Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the District (CEQA Guidelines, § 1565).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure # 5: Crotch's Bumble Bee Surveys - The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species](#)⁴. Focused surveys shall also

³ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

⁴ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch's bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.

Mitigation Measure # 6: Crotch's Bumble Bee Incidental Take Permit – If Crotch's bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.

Recommendation # 5: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the Lead Agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

COMMENT # 5: Impacts on Coastal California Gnatcatcher

Issue: The Project may impact coastal California gnatcatcher.

Specific impact: Project activities such as grading and vegetation removal may result in permanent loss of nesting and foraging habitat. Ground-disturbing activities during breeding and nesting season may also result in nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings.

Why impact would occur: The DEIR acknowledges that coastal California gnatcatcher is an obligatory resident of coastal sage scrub, which is present within the Project site. While the City notes that there is potential for this SSC to be present on site, no species-specific measures are incorporated in the DEIR since the species was not observed during the 2024 focused surveys. Subsequent focused surveys should be conducted to accurately determine presence/absence of coastal California gnatcatcher. Project activities without the appropriate surveys could result in injury or mortality of unidentified gnatcatcher, including eggs or nestlings. Furthermore, grading activities and removal of coastal sage scrub can result in permanent loss of breeding and foraging habitat for coastal California gnatcatcher.

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Evidence impact would be significant: CEQA provides protection for special status species, including SSC. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065). The reductions in the number of special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. 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 and/or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 6: USFWS Consultation - Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground disturbing activities and/or vegetation removal that may impact gnatcatcher.

Mitigation Measure # 7: Coastal California Gnatcatcher Surveys – The Project proponent shall retain a qualified biologist with an appropriate USFWS permit to survey the Project site. The qualified biologist shall conduct surveys according to USFWS’s [Coastal California Gnatcatcher \(*Polioptila californica californica*\) Presence/Absence Survey Protocol](#)⁵. The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing. CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City’s issuance of a grading permit.

COMMENT # 6: Impacts on Bat Species and Roosts

Issue: Mitigation Measure BIO-4 does not adequately mitigate the Project impacts on bat species and potential bat maternity roosts.

Specific impact: The Project would result in the removal of trees, tree encroachment, and vegetation removal within the disturbance footprint. These activities could result in direct mortality of individual bats or roost disturbance via increased noise disturbances,

⁵ <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-coastal-california-gnatcatcher.pdf>

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human activity, dust, ground-disturbing activities (e.g., staging, access, grading, excavating, paving), and vibrations caused by heavy equipment.

Why impact would occur: According to the BTR, daytime habitat assessment and nighttime emergence acoustic surveys were conducted on the Project site for bat presence. Findings from the surveys detected five species of bats with most calls coming from two species indicating the potential presence of a roosting site and/or maternity colony within the Project site (pg. 19). Additionally, there is a moderate to high potential for the Townsend's big-eared bat, western mastiff bat, and western red bat to be present within the Project site. While CDFW appreciates the discussion in the DEIR on the Project's impact on bat species and the incorporation of pre-construction surveys, the mitigation measure does not discuss outline compensatory mitigation to offset the loss of bat roosting habitat. Without replacement of bat roosting habitat, the Project would contribute to the cumulative loss of suitable bat habitat on a local and regional scale. At a minimum the City and Project proponent should consider providing artificial roosting structures to replace natural roosting habitat on site.

Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Additionally, 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 ESA-, but not CESA-, threatened, or endangered;
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,
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 2025).

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). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

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Mitigation Measure # 8: Mitigation Measure BIO-4 – CDFW recommends the City revise Mitigation Measure BIO-4 to incorporate the underlined language and remove the language in strikethrough:

Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project site (plus a 100-foot buffer as access allows) ~~a pre-construction bat roost survey shall be conducted~~ to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). A discussion of survey results, including negative findings, shall be provided to the City and CDFW. ~~If individual bats or active maternity roosts are identified, the Project proponent and qualified bat specialist project shall consult with and receive written concurrence from~~ California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat ~~maternity~~ colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified biologist verifies the ~~maternity~~ bat roost is no longer in use.

If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified bat specialist ~~biologist~~ shall conduct a pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are roosting in the project area. If roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified roost sites shall be monitored by a qualified bat specialist ~~biologist~~ to ensure bats have vacated the roost prior to the start of construction activities. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.

Mitigation Measure # 9: Tree Removal – To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the bat specialist, shall elapse prior to such operations to allow bats to escape.

Mitigation Measure #10: Bat Roost Compensatory Mitigation – If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat

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specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.

ADDITIONAL COMMENTS

Mitigation Measure BIO-1. CDFW recommends the City revise Mitigation Measure BIO-1 to incorporate the underlined language and omit the language in strikethrough:

The following measures shall be implemented prior to and during construction as follows:

- a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species ~~within at least a moderate or higher potential to colonize~~ the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.
- b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.
- c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.
- d) If any special-status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

Lighting. Artificial night lighting can affect plants and wildlife through attraction and disorientation, loss of connectivity, interference with pollination and foraging, and disruption of circadian rhythms and lunar and seasonal cycles (Barrientos et al. 2023).

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CDFW recommends the City incorporate a lighting plan in the final EIR that discusses the criteria used in selecting the types of light fixtures, a schedule detailing the hours various lights will be on, and steps taken to minimize adverse effects on wildlife species. Methods for minimizing adverse effects of artificial night lighting include lighting only where light is necessary, turning lights off when they are not in use (e.g., motion detector), only using as much light as is needed, directing the light only where it is needed, and using the lowest possible correlated color temperature for the goal of the lighting.

Landscaping. CDFW recommends the City incorporate a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the [California Invasive Plant Council](#)⁶. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include the mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). 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 a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations 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 natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)⁷ provides directions regarding the types of information that should be reported and allows on-line submittal of field survey forms.

⁶ <https://www.cal-ipc.org/plants/inventory/>

⁷ <https://wildlife.ca.gov/Data/CNDDDB>

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In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)⁸.

The City should ensure data collected for the preparation of the DEIR is properly submitted.

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 City and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order 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

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on 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)).

Questions regarding this letter or further coordination should be directed to Julisa Portugal⁹, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:

5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

⁹ Phone: (858) 203-5872; Email: Julisa.portugal@wildlife.ca.gov

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ec: California Department of Fish and Wildlife
Victoria Tang, CDFW Environmental Program Manager
Steve Gibson, Senior Environmental Scientist Supervisor
Julisa Portugal, Senior Environmental Scientist (Specialist)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

Barrientos, R., Vickers, W., Longcore, T., Abelson, E. S., Dellinger, J., Waetjen, D. P., & Shilling, F. M. 2023. Nearby night lighting, rather than sky glow, is associated with habitat selection by a top predator in human-dominated landscapes. *Philosophical Transactions of the Royal Society B*, 378 (1892), 20220370.

[CBD] Center of Biological Diversity. 2019. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA). Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>

[CDFW] California Department of Fish and Wildlife. 2013. Human/Wildlife Interactions in California: Mountain Lion Depredation, Public Safety, and Animal Welfare. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68271>

[CDFW] California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

[CDFW] California Department of Fish and Wildlife. 2025a. Mountain Lions in California. Available at: <https://wildlife.ca.gov/Conservation/Mammals/Mountain-Lion#632775308-mountain-lion--wolf---prey-spatiotemporal-interactions>

[CDFW] California Department of Fish and Wildlife. 2025b. Threatened and Endangered Species. Available at: <https://wildlife.ca.gov/Conservation/CESA>

Lucas, E. (2020). Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs. *California Fish and Wildlife, Recreation Special Issue 2020*: 29-51.

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #1: Fuel Modification Compensatory Mitigation The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone.</p>	<p>Following Project activities</p>	<p>Project Proponent</p>
<p>Mitigation Measure #2: Mountain Lion Encounters If a mountain lion is encountered during pre-construction surveys or construction activities, the qualified biologist and all other worker personnel shall immediately leave the work area. The qualified biologist shall immediately contact CDFW, and the animal shall be allowed to passively move out of harm’s way to an area that is unaffected by the Project. Project activities the Project site shall not recommence in the work area until the following day and only with coordination and communication with CDFW prior to recommencing project activities.</p>	<p>During Project activities</p>	<p>Qualified Biologist/ Worker Personnel</p>
<p>Mitigation Measure #3: Incidental Take Permit If take or adverse impacts to mountain lion cannot be avoided, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW. The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.</p>	<p>Prior to ground-disturbing activities</p>	<p>Project Proponent</p>
<p>Mitigation Measure #4: Rodenticides To eliminate potential mortality, the Project proponent shall prohibit use of any and all rodenticides within the Project site in perpetuity. The Project proponent shall inform</p>	<p>Prior to, during and following</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
future homeowners that no rodenticides shall be used on site at any time as a condition of home build or purchase.	Project activities	
<p>Mitigation Measure #5: Crotch’s Bumble Bee Surveys The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW’s Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch’s bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.</p>	Prior to ground-disturbing activities	Project Proponent/ Qualified Biologist
<p>Mitigation Measure #6: Crotch’s Bumble Bee Incidental Take Permit If Crotch’s bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW. The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.</p>	Prior to ground-disturbing activities	Project Proponent
<p>Mitigation Measure #7: Coastal California Gnatcatcher Surveys The Project proponent shall retain a qualified biologist with an appropriate USWFS permit to survey the Project site. The qualified biologist shall conduct surveys according to USFWS’s Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) Presence/Absence Survey Protocol. The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing. CDFW recommends gnatcatcher surveys be conducted and</p>	Prior to issuance of grading permit	Project Proponent/ Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
<p>USFWS notified (per protocol guidance) prior to the City’s issuance of a grading permit.</p>		
<p>Mitigation Measure #8: Mitigation Measure BIO-4 Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project site (plus a 100-foot buffer as access allows) to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). A discussion of survey results, including negative findings, shall be provided to the City and CDFW. If individual bats or active maternity roosts are identified, the Project proponent and qualified bat specialist shall consult with and receive written concurrence from California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified biologist verifies the bat roost is no longer in use.</p> <p>If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified bat specialist shall conduct a pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are roosting in the project area. If roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified roost sites shall be monitored by a qualified bat specialist to ensure bats have vacated the roost prior to the start of construction activities. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.</p>	<p>Prior to Project activities</p>	<p>Project Proponent/ Bat Specialist</p>

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Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #9: Tree Removal To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the bat specialist, shall elapse prior to such operations to allow bats to escape.</p>	<p>During Project activities</p>	<p>Worker Personnel/ Bat Specialist</p>
<p>Mitigation Measure #10: Bat Roost Compensatory Mitigation If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.</p>	<p>Following Project activities</p>	<p>Project Proponent</p>
<p>Mitigation Measure #11: Mitigation Measure BIO-1 The following measures shall be implemented prior to and during construction as follows: a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources</p>	<p>Prior to and during Project activities</p>	<p>Project Proponent/</p>

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Mitigation Measure	Timing	Responsible Party
<p>clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species within the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.</p> <p>b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.</p> <p>c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.</p> <p>d) If any special-status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</p>		<p>Project Biologist</p>

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Mitigation Measure	Timing	Responsible Party
<p>Recommendation #1: Adoption of Alternative 2 CDFW strongly recommends the City and Project proponent moves forward with the adoption of Alternative 2: Reduced Lot Size Design Alternative for the Project.</p>	<p>Prior to adoption of final EIR</p>	<p>Lead Agency</p>
<p>Recommendation #2: Fuel Modification Impacts The City should revise the DEIR to include a Fire Management Plan for public review. With respect to defensible space, the Fire Management Plan should fully describe and identify the location, acreage, and composition of defensible space within the Project site. The City through its planning processes, should ensure that defensible space is provided and accounted for within proposed development areas, and not included in any conservation areas. Additionally, the Fire Management Plan should outline compensatory mitigation to offset the permanent loss of natural vegetation.</p>	<p>Prior to final EIR</p>	<p>Lead Agency</p>
<p>Recommendation #3: Wildlife Fencing The City and Project proponent should consider placing a wildlife exclusion fence around the perimeter of the residential community to exclude mule deer and other potential prey for mountain lion from entering the residences. Wildlife fencing should be at least 12-feet tall with an overhang discouraging jumping. Fences should be made from sturdy material with gaps no larger than 4-inches.</p>	<p>Prior to Project activities</p>	<p>Lead Agency/ Project Proponent</p>
<p>Recommendation #4: Human-Wildlife Interaction To prevent human-wildlife conflicts within the Project site, the Project proponent should incorporate the following elements into the design of the residential development, as well as management and maintenance of the residences in perpetuity. These elements should be recorded in any HOA documents:</p> <ol style="list-style-type: none"> 1. Never feed deer or other wildlife; it is illegal to feed deer and other big game in California and it will attract mountain lions; 2. Deer-resistant/deterring landscape design, planting species that are less palatable to mule deer; 	<p>Prior to Project activities and adoption of HOA documents</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
3. Trim bushes and shrubs to 2 to 3-feet above the ground to reduce hiding places for mountain lions and keep brush trimmed low; and, 4. Install motion-sensitive lighting and consider installing additional deterrents around the residential development		
Recommendation #5: CEQA To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project’s CEQA document should fully identify the potential impacts to Crotch’s bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to final EIR	Lead Agency / Project Proponent
Recommendation #6: USFWS Consultation CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground disturbing activities and/or vegetation removal that may impact gnatcatcher.	Prior to ground-disturbing activities	Project Proponent
Recommendation #7: Lighting CDFW recommends the City incorporates a lighting plan in the final EIR that discusses the criteria used in selecting the types of light fixtures, a schedule detailing the hours various lights will be on, and steps taken to minimize adverse effects on wildlife species. Methods for minimizing adverse effects of artificial night lighting include lighting only where light is necessary, turning lights off when they are not in use (e.g., motion detector), only using as much light as is needed, directing the light only where it is needed, and using the lowest possible correlated color temperature for the goal of the lighting.	Prior to final EIR	Lead Agency
Recommendation #8: Landscaping CDFW recommends the City incorporates a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or	Prior to final EIR	Lead Agency/ Project Proponent

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Mitigation Measure	Timing	Responsible Party
otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.		