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September 30, 2025

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**SUBJECT: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR
THE HUNGRY VALLEY STATE VEHICULAR RECREATION AREA GENERAL PLAN
UPDATE
STATE CLEARINGHOUSE NO. 2023110034
VENTURA, KERN, AND LOS ANGELES COUNTIES, CALIFORNIA**

Dear Katie Metraux:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Program EIR (DEIR) from the California Department of Parks and Recreation (Parks) for the Hungry Valley State Vehicular Recreation Area (SVRA) General Plan Update (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

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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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 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.), the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), or the Western Joshua Tree Conservation Act (Fish & G. Code, § 1927 et seq.) the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division

Objective: The objective of the Project is to update the existing General Plan for the Hungry Valley SVRA. Primary Project objectives of the General Plan Update include defining long-range visions and goals and providing direction for future types of improvements, services, and programs. Additionally, the Project includes multiple infrastructure improvements to the SVRA, including new or upgraded administration, maintenance, recreation, and visitor-serving facilities. New visitor-serving facilities may include a new northern public access point, a new public loop trail, a new recreational vehicle (RV) campground with full hookups, additional track facilities, a designated unmanned aerial vehicle area, and a new visitors center. Further, this Project includes various SVRA maintenance and operations activities, such as roadway improvements and upgrades, and additions to the administrative and maintenance buildings.

Location: The Hungry Valley SVRA is located just south of the point where Los Angeles, Ventura, and Kern Counties intersect. The majority of the SVRA is located in Los Angeles and Ventura Counties, while a smaller northern portion lies within Kern County. Hungry Valley SVRA can be accessed via Interstate 5 (I-5). At the halfway point of Hungry Valley SVRA, State Highway 138 bisects I-5 and provides primary access from the southern boundary to the interior of Hungry Valley SVRA, the Alamo Mountain, Hardluck, and other recreation areas in the Los Padres National Forest. The Angeles National Forest is to the south and east. Nearby is the town of Gorman and the communities of Lebec and Frazier Park.

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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Timeframe: The Hungry Valley SVRA General Plan Update is expected to be utilized for a 30 year duration.

Biological Setting: Hungry Valley SVRA consists of approximately 19,625 acres encompassing several distinct geographic ecoregions such as the San Emigdio Mountains, the Tehachapi Mountains of the Transverse Ranges, the Coast Range, the southern Sierra Nevada, the Central Valley, and the Mojave Desert. A June 2024 wildfire of approximately 10,000 acres in the eastern and southern portions of the park significantly changed the environmental setting at Hungry Valley SVRA. The fire burned much of the habitat and vegetation, charred or altered many of the natural features, and destroyed two on-site structures. Although a major portion of the SVRA was impacted by wildfire, there are several sections that were unaffected by fire.

Over forty vegetation communities exist at Hungry Valley including woodland, chaparral, sagebrush and scrub, riparian and wetlands, and grasslands and herbaceous communities. The diverse population of wildlife found at Hungry Valley includes, but is not limited to, many types of birds, reptiles, insects, and mammals.

Special-status species that have the potential to occur on site, and may be impacted by the Project, include, but are not limited to: blunt-nosed leopard lizard (*Gambelia sila*; Endangered Species Act (ESA)-listed Endangered, California Endangered Species Act (CESA)-listed Endangered, Fully Protected Species (FP)), California condor (*Gymnogyps californianus*; ESA Endangered, CESA Endangered, FP), least Bell's vireo (*Vireo bellii pusillus*; ESA Endangered, CESA Endangered), golden eagle (*Aquila chrysaetos*; FP), white-tailed kite (*Elanus leucurus*; FP), ringtail (*Bassariscus astutus*; FP), Swainson's hawk (*Buteo swainsonii*; CESA Threatened), Crotch's bumble bee (*Bombus crotchii*; CESA Candidate Species), western burrowing owl (*Athene cunicularia hypugaea*; CESA Candidate Species), monarch butterfly (*Danaus Plexippus*; ESA Proposed Threatened), western Joshua tree (*Yucca brevifolia*; CESA Candidate Species), San Bernadino aster (*Symphyotrichum defoliatum*; California Rare Plant Rank (CRPR) 1B.2), Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*; CRPR 1B.2), Robbins' nemacladus (*Nemacladus secundiflorus* var. *robbinsii*; CRPR 1B.2), Big Bear Valley woollypod (*Astragalus leucolobus*; CRPR 1B.2), Tehachapi monardella (*Monardella linoides* ssp. *oblonga*; CRPR 1B.3), American badger (*Taxidea taxus*; California Species of Special Concern (SSC)), pallid bat (*Antrozous pallidus*; SSC), Tehachapi pocket mouse (*Perognathus alticola inexpectatus*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), western red bat (*Lasiurus frantzii*; SSC), loggerhead shrike (*Lanius ludovicianus*; SSC), northern harrier (*Circus hudsonius*; SSC), yellow-headed blackbird (*Xanthocephalus xanthocephalus*; SSC), yellow warbler (*Setophaga petechia brewsteri*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), coast patch-nosed snake (*Salvadora hexalepis virgulata*; SSC), coastal California whiptail (*Aspidoscelis tigris stejnegeri*; SSC), northern California legless lizard (*Anniella pulchra*; SSC), northwestern (*Actinemys marmorata*;

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SSC), southwestern pond turtle (*Actinemys pallida*; SSC), two-striped gartersnake (*Thamnophis hammondi*; SSC), and western spadefoot (*Spea hammondi*; SSC).

Project History: Hungry Valley SVRA was acquired by the State with money from the Off-Highway-Vehicle (OHV) Fund and has been in operation as an officially recognized SVRA since approximately 1980. Prior to its acquisition by the State, most of the land was privately owned, and control of trespass OHV riding was difficult. When the State purchased SVRA lands in 1978, OHV activity was heavy at the upper end of Hungry Valley proper, and moderate in the hills overlooking Gorman and on the southern border of the unit. The original General Plan for the SVRA was adopted in 1981.

A Notice of Preparation (NOP) was submitted for the Project on November 1, 2023. CDFW provided recommendations in the form of a comment letter on December 18, 2023. Recommendations included Crotch's bumble bee surveys, a discussion of Project alternatives, a lighting plan, a discussion and analysis of how the siting of Project facilities and trails are chosen, how management of the Project site has changed since the original General Plan was adopted in 1981, a biological resource inventory, discussion of biological impacts, and proposed mitigation measures for impacts to biological resources.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Parks in adequately identifying and/or mitigating the Project's significant, or potentially 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: Impacts to Biological Resources

Issue: Development facilitated by the Project may impact biological resources.

Specific impact: Direct and indirect impacts to biological resources may result from Project site development. Impacts to biological resources may result in reproductive suppression, mortality, injury to wildlife, and population decline of a special status, sensitive, or rare species or natural community.

Why impact would occur: The DEIR states that over 15 acres of paved surface, 3.5 miles of trails, an electric vehicle charging station, a visitor center, a group campground (approximately 4 acres), an RV campground (approximately 5 acres), and two practice track facilities (totaling approximately 6 acres) would be added to the current Project area. In addition, existing facilities are expected to be maintained, upgraded, or demolished, as needed. The DEIR concludes that the Project's impact on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations; or by CDFW and/or United States Fish and Wildlife Service (USFWS) is less than significant through implementation of the Project's goals and guidelines, and compliance with provisions of the various State and federal regulations.

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However, the DEIR also states that visitation to the Hungry Valley SVRA is conservatively estimated to increase by ten percent. Mitigation measures that would offset the increase in impacts included in the Updated General Plan were not included in the DEIR. The included Project Goals and Guidelines are policies that do not prescribe, require, or impose specific actions that would substantially mitigate for impacts to candidate, sensitive, or special status species at a project level. In addition, the DEIR does not require future development facilitated by the Project to undertake any measures to mitigate for impacts to candidate, sensitive, or special status species, other than birds. As a result, the Project may result in unmitigated impacts.

Evidence impact would be significant: The Updated General Plan has identified multiple new areas that will be added to the Hungry Valley SVRA, which will require ongoing management. Further the Updated General Plan describes existing facilities that may undergo changes (e.g., upgrade or demolition) during the life of the General Plan. The Project as described may result in direct physical changes to the environment and impact special status, sensitive, or rare plant or wildlife species, or natural communities. Even when conducted in disturbed areas, indirect impacts from Project activities, including increased noise, could cause impacts to plant or wildlife species. Take under ESA 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.

Plants with a California Rare Plant Rank (CRPR) of 1B meets the definition of endangered, rare, or threatened species under CEQA (CEQA Guidelines, §15380; CNPS 2022a). Plants with a CRPR of 4 may meet the definition of endangered, rare, or threatened species. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities)³ webpage (CDFW 2025a). Without enforceable mitigation measures, impacts on sensitive natural communities could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Development facilitated by the Project may substantially reduce the habitat of fish and wildlife species; cause fish or wildlife populations to drop below self-sustaining levels; threaten to eliminate plant or animal communities; or substantially reduce the number or restrict the range of endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)]. Without appropriate mitigation, the Project may have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species, or a Sensitive Natural Community, in local or regional plans, policies, or regulations, or by CDFW and/or USFWS.

³ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

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Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #1: Future Development – Future development projects on approved Project sites shall conduct the appropriate biological resource and technical studies as part of Project-level analyses including baseline surveys, protocol-level surveys, and tree inventories to confirm the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys shall be required if suitable habitat is present. These surveys shall be performed according to any established CDFW and/or USFWS protocols. Reports shall be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. Biological resources technical studies shall include the following:

1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site shall also be addressed. A nine-quadrangle search of CDFW's [California Natural Diversity Database](#)⁴ (CNDDB) shall be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2025b);
2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#)⁵ (CDFW 2018). Adjoining habitat areas shall be included where Project construction and activities could lead to direct or indirect impacts off site;
3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The [Manual of California Vegetation](#)⁶ (MCV), shall be used to inform this mapping and assessment (Sawyer et al. 2009);
4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) [Online](#)

⁴ <https://wildlife.ca.gov/Data/CNDDB>

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>

⁶ <http://vegetation.cnps.org/>

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[Inventory of Rare and Endangered Plants of California](#)⁷ (CNPS 2025b) as well as the Calflora's [Information on Wild California Plants](#)⁸ database (Calflora 2025);

5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and
6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site.

Mitigation Measure #2: Rare Plants – If a rare plant species or a Sensitive Natural Community is detected, Parks shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, Parks shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. Parks shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. Parks shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.

Mitigation Measure #3: Blunt-Nosed Leopard Lizard – CNDDDB includes an occurrence within Hungry Valley SVRA (2025b). As blunt-nosed leopard lizard (BNLL) may have the potential to occupy the Project site, a qualified biologist shall conduct a habitat assessment for BNLL within the Project site, and vicinity, with a focus on the low lying and low sloped areas of the Project site. If suitable habitat is identified during these assessments, a qualified biologist shall conduct protocol surveys in accordance with the “Approved Survey Methodology for the Blunt-nosed Leopard Lizard” (CDFW 2019) ahead of any ground disturbing Project activities. If surveys indicate the presence or potential presence of BNLL, Parks shall consult with CDFW to discuss how to implement ground-disturbing activities and avoid take.

⁷ <https://rareplants.cnps.org/>

⁸ <https://www.calflora.org/>

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Mitigation Measure #4: Western Joshua Tree – The eastern portion of the Project site is within the range of western Joshua tree (WJT), and the Preliminary General Plan notes that Hungry Valley SVRA is home to the westernmost stand of WJT. Prior to any ground disturbance for Project activities within the WJT range, a qualified botanist shall conduct focused WJT surveys to identify the locations, number, and health of individuals as part of the biological technical studies conducted in support of the Project that may impact WJT. WJT is a candidate threatened species under CESA. Under CESA, species classified as a candidate species are afforded the same protection as CESA-listed species. Take of any CESA listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). The California State legislature has enacted the Western Joshua Tree Conservation Act (WJTCA), which aims to provide protection of WJT and provides another permitting mechanism for the incidental take of WJT. For unavoidable impacts, Parks shall consult with CDFW and obtain appropriate take authorization under CESA or the WJTCA.

Mitigation Measure #5: CESA ITP – CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. In regard to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity for the duration of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, Parks shall seek appropriate take authorization under CESA prior to implementing or continuing the Project. Appropriate authorization from CDFW may include an ITP, or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts to CESA listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals shall be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

COMMENT # 2: Updated Biological Surveys

Issue: The DEIR may not accurately reflect the Project site's current biological resources and subsequent impacts to resources.

Specific impact: The DEIR references biological reports from 1997, 2006-2019, and 2020. In addition, the DEIR does not provide details regarding the vegetative communities that may be found within the Project site. As such, the reports included with the DEIR may not accurately represent current Project site conditions, which may result in an inaccurate analysis of potential impacts to biological resources that may result from Project implementation.

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Why impact would occur: Topography, resource availability, and species occupation may vary over time. Factors such as periods of drought and inundation, and events such as wildfire may result in changes to vegetative communities and species occupation and utilization of the Project site. As such, sensitive species and/or communities may have established themselves since the last habitat assessment, which was conducted in 2020. Wildlife not previously observed may now be residents and use the Project site for breeding, nesting, or foraging. CDFW generally considers biological surveys and habitat assessments to be valid for a period of one year, and assessments for rare plants to be valid for a period of up to three years.

In order to avoid or fully mitigate for impacts to sensitive species and communities, updated habitat assessments and biological surveys that reflect current conditions of the Project site and adjacent areas should be included in the FEIR.

Evidence impact may be significant: Field verification for the presence or absence of sensitive species and communities is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)).

Recommended Potentially Feasible Mitigation Measure(s)

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

Recommendation #1: Biological Assessment Surveys – The Final Environmental Impact Report (FEIR) should include updated biological field surveys that accurately describe the current state of the Project site and adjacent areas, as well as provide a comprehensive inventory of biological species that may be present within the Project site and adjacent areas. Surveys should be conducted at the appropriate time of year and time of day when sensitive species are active, or otherwise identifiable, for both plants and wildlife. Based on the survey results, the FEIR should propose avoidance and mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the FEIR for public review.

COMMENT # 3: Increased Recreation

Issue: The Project may increase human and wildlife interactions through the addition of new trails and recreational facilities.

Specific impact: Direct impacts in the form of habitat loss and degradation may occur as a result of the construction of new trails and recreational facilities, as well as from off-trail use from visitors. Impacts to wildlife may include reduced habitat quality, increase in species mortality or injury, reproductive suppression during breeding seasons, or population decline of special-status species. Indirect effects to biological resources, such as noise, trash, and predation of, and by, domestic pets, also occur when trail systems run through natural open spaces.

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Why impact would occur: The Hungry Valley SVRA consists of over 19,625 acres. The DEIR states that 15 acres of paved surfaces, 3.5 miles of trails, an electric vehicle charging station, a visitor center, a group campground (approximately 4 acres), an RV campground (approximately 5 acres), and two practice track facilities (totaling approximately 6 acres) would be added to the current Project area. The DEIR conservatively estimates that visitation to the Project area will increase by 10 percent.

High volume recreational use within the trail system will result in increased human and wildlife interaction. Additionally, the Project site and adjacent areas may experience increased noise levels, increased trash or pet waste, and the introduction of unnatural food sources via trash and trash receptacles. Outdoor recreation may also cause distress on individual wildlife, resulting in energetic costs to the animal and a decline in the animals' behavior and overall fitness. Studies have shown that outdoor recreation is the second leading cause of the decline of federally threatened and endangered species on public lands (Losos *et al.* 1995) and fourth leading cause on all lands (Czech *et al.* 2000). Overall, and expansion of recreational trails will likely lead to an increase in human-wildlife interactions that may result in harm to wildlife and/or humans.

A discussion regarding potential impacts resulting from ongoing recreational activities including an increased human presence within the Project site was not provided, and measures to mitigate for the impacts described above were not included in the DEIR. In addition, the DEIR did not consider that the buildout of the proposed Project may not provide an effective buffer to neutralize edge effects. As such, the undisturbed open space may restrict wildlife movement and may result in increased human disturbance. Habitat in adjacent areas may also be impacted by edge effects, for example, impacts resulting from artificial lighting, introduction of pets and domestic animals, and the potential introduction of invasive and non-native vegetation.

Evidence impact would be significant: The Project area supports a variety of special-status species. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Impacts on the special-status wildlife may require a mandatory finding of significance because the Project may potentially threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of endangered, rare, or threatened species (CEQA Guidelines, §15065). Inadequate avoidance, minimization, and mitigation measures for impacts to special status plant or wildlife species 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:

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Mitigation Measure #6: Trail Plan – Parks shall develop a Road and Trails Management Plan (Plan) to govern the development of new trails. The Plan shall include details regarding the installation of appropriate signage and trash receptacles, allowable and prohibited trail uses, and best management practices. Additionally, fence installation and maintenance associated with trail creation and operation may obstruct wildlife movement and result in wildlife injury or mortality due to impalement and/or entanglement (e.g., chain-link fencing). Therefore, the Plan shall include wildlife-friendly fencing and design plans.

Mitigation Measure #7: Public Education – Parks shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.

Mitigation Measure #8: Trash – All trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

Mitigation Measure #9: Activity Restriction – Parks shall place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets shall always be kept on leash and on designated public and pet friendly trails. Hikers shall be encouraged to clean up after their dogs and discourage leaving animal waste as it tends to lead to wildlife avoidance.

Mitigation Measure #10: Compensatory Mitigation – Based on the new impacts identified and disclosed in Recommendation #1) Biological Assessment Surveys, Parks shall provide commensurate compensatory mitigation to offset the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.

Recommendation #2: Buffer Determination – Parks should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment, etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the FEIR.

Recommendation #3: Recreation Discussion – The FEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence

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wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes and electric bikes (e-bikes) on biological resources. Specifically, e-bikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts. The FEIR should provide an analysis of impacts that may result from the use of e-bikes, as well as provide mitigation measures for their use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.

Recommendation #4: Fencing Designs – Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends [A Landowner's Guide to Wildlife Friendly Fences](#)⁹ for information about wildlife-friendly fences (MFWP 2012).

COMMENT # 4: Crotch's Bumble Bee

Issue: The DEIR may not provide sufficient avoidance and mitigation for Crotch's bumble bee.

Specific impact: Project implementation and operation may result in potentially significant impacts to Crotch's bumble bee such as loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

Why impact would occur: The DEIR states that Crotch's bumble bee has a high potential to occur on the Project site; however, focused surveys for Crotch's bumble bee have not been completed. Focused bumble bee surveys may assist in analyzing potential impacts to Crotch's bumble bee. In addition, the DEIR does not include discussion regarding Crotch's bumble bee status as a CESA candidate species and does not include mitigation measures for avoidance of Crotch's bumble bee or propose mitigation for impacts to the species. Therefore, impacts to Crotch's bumble bee may occur, which may result in unauthorized take of the species under CESA

Evidence impact would be significant: The California Fish and Game Commission accepted the petition to list the Crotch's bumble bee as a candidate 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

⁹ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=134713&inline>

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Crotch's bumble bee. The Project may also reduce the number 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 area. In addition, Crotch's bumble bee has a State Ranking of S1/S2. Specifically, this means that Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five 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](#)¹⁰ (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380).

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #11: Incidental Take Permit – If Crotch's bumble bee is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.*). Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact Crotch's bumble bee.

Mitigation Measure #12: Crotch's Bumble Bee Surveys – Parks shall retain a qualified biologist with the appropriate experience and/or handling permits to conduct focused surveys for Crotch's Bumble Bee. Focused surveys shall follow CDFW's [Survey Conditions for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#)¹¹ (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and adjacent areas during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing activities.

Recommendation #5: Crotch's Bumble Bee Discussion – The FEIR should acknowledge that Crotch's bumble bee are designated as a CESA candidate species and afforded full protection under CESA. If the Project may impact Crotch's bumble bee, the FEIR should incorporate measures to mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA ITP can be issued based on the analysis provided in the FEIR.

¹⁰<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

¹¹<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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COMMENT # 5: Western Burrowing Owl

Issue: The DEIR does not analyze potential impacts to western burrowing owl.

Specific impact: Project activities such as vegetation clearing, grading, trail construction, building construction or demolition, and increased human presence may impact western burrowing owls. The DEIR does not provide analysis of potential impacts to western burrowing owl, nor does it propose mitigation measures to reduce the significance of the impacts to the species.

Why impact would occur: On October 15, 2024, the Fish and Game Commission published a Notice of Findings that designates western burrowing owl as a CESA candidate species (FGC 2024). The DEIR does not acknowledge western burrowing owl as a CESA candidate species. In addition, focused surveys for western burrowing owl have not been performed within the Project site or adjacent areas.

Project activities that have the potential to impact western burrowing owl, their nests or eggs, or destroy or degrade western burrowing owl habitat include grading, disking, cultivation, earthmoving, burrow blockage, heavy equipment compacting and crushing burrow tunnels. In addition, the following activities may have impacts to western burrowing owl populations: eradication of host burrowers; changes in vegetation management (i.e., grazing); use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering, or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in harassment of owls at occupied burrows (CDFW 2012). If Project activities overlap with the breeding season for western burrowing owl, there is potential for Project activities to result in abandonment of burrows, burrow collapse, or injury/mortality of owlets. Furthermore, attempts to flush western burrowing owl from the site may disturb, distress, or lead to potential take of individual western burrowing owl. To avoid unauthorized take, the FEIR should incorporate mitigation measures that prescribe focused surveys for the species, and measures to be implemented to ensure full avoidance of the species if detected. If avoidance is not feasible coordination with CDFW to obtain appropriate take authorization is recommended.

Evidence impact would be significant: Western burrowing owl is a species designated as candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 *et seq.*). Take of any endangered, threatened, or 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). Additionally, take of individual western burrowing owl 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.” 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

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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)

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

Mitigation Measure #13: Incidental Take Permit – If an occupied burrow or western burrowing owl is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.*). Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact western burrowing owl.

Recommendation #6: Western Burrowing Owl Discussion – The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.

ADDITIONAL COMMENTS

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's FEIR 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 Lead Agency 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).

Scientific Collecting Permit. Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. Parks should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit

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is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#)¹² webpage for information (CDFW 202c).

Lake and Streambed Alteration. Project activities, as described, have the potential to temporarily and permanently impact hydrological systems and features within the Hungry Valley SVRA and may be subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 *et seq.* Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 *et seq.* Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's [LSA webpage](#)¹³.

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 (CNDDB). The [CNDDB website](#)¹⁴ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

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](#)¹⁵.

¹² <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>

¹³ <https://wildlife.ca.gov/Conservation/LSA>

¹⁴ <https://wildlife.ca.gov/Data/CNDDB>

¹⁵ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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

FILING FEES

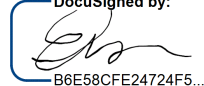
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental 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 Parks in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that Parks 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 Riley Scott¹⁶, Environmental Scientist.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Regional Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
South Coast Region 5
Victoria Tang, Environmental Program Manager
Steve Gibson, Senior Environmental Scientist (Supervisory)
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisory)
Riley Scott, Environmental Scientist

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Central Region 4
Julie Vance, Regional Manager
Krista Tomlinson, Environmental Program Manager
Jeremy Pohlamm, Senior Environmental Scientist (Supervisor)
Bonna Newell, Senior Environmental Scientist (Specialist)
Marile Colindres, Environmental Scientist

State Clearinghouse
Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

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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
Mitigation Measure #1: Future Developments – Future development projects on Approved Project sites shall conduct the appropriate biological resources technical studies as part of Project-level analyses, including baseline surveys, protocol-level surveys, tree inventories to confirm the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys shall be required if suitable habitat is present. These surveys shall be performed according to any established CDFW and/or USFWS protocols. Reports shall be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. Biological resources technical studies shall include the following: 1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site shall also be addressed. A nine-quadrangle search of CDFW's California Natural Diversity Database¹⁷ (CNDDB) shall be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW	Prior to Project Initiation	Project Proponent

¹⁷ <https://wildlife.ca.gov/Data/CNDDB>

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Mitigation Measure	Timing	Responsible Party
2025b); 2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities¹⁸ (CDFW 2018). Adjoining habitat areas shall be included where Project construction and activities could lead to direct or indirect impacts off site; 3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The Manual of California Vegetation¹⁹ (MCV), shall be used to inform this mapping and assessment (Sawyer et al. 2009); 4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California²⁰ (CNPS 2025b) as well as the Calflora's Information on Wild California Plants²¹ database (Calflora 2025); 5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan		

¹⁸ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>

¹⁹ <http://vegetation.cnps.org/>

²⁰ <https://rareplants.cnps.org/>

²¹ <https://www.calflora.org/>

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Mitigation Measure	Timing	Responsible Party
(Fish & G. Code, § 2800 et. seq.)); and 6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site.		
Mitigation Measure #2: Rare Plants – If a rare plant species or a Sensitive Natural Community is detected, Parks shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, Parks shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. Parks shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. Parks shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.	Prior to Project Initiation	Project Proponent
Mitigation Measure #3: Blunt-Nosed Leopard Lizard – CNDDDB includes an occurrence within Hungry Valley SVRA (2025b). As blunt-nosed leopard lizard (BNLL) may have the potential to occupy the Project site, a qualified biologist shall conduct a	Prior to Project Initiation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
habitat assessment for BNLL within the Project site, and vicinity, with a focus on the low lying and low sloped areas of the Project site. If suitable habitat is identified during these assessments, a qualified biologist shall conduct protocol surveys in accordance with the “Approved Survey Methodology for the Blunt-nosed Leopard Lizard” (CDFW 2019) ahead of any ground disturbing Project activities. If surveys indicate the presence or potential presence of BNLL, Parks shall consult with CDFW to discuss how to implement ground-disturbing activities and avoid take.		
Mitigation Measure #4: Western Joshua Tree – The eastern portion of the Project site is within the range of western Joshua tree (WJT), and the Preliminary General Plan notes that Hungry Valley SVRA is home to the westernmost stand of WJT. Prior to any ground disturbance for Project activities within the WJT range, a qualified botanist shall conduct focused WJT surveys to identify the locations, number, and health of individuals as part of the biological technical studies conducted in support of the Project that may impact WJT. WJT is a candidate threatened species under CESA. Under CESA, species classified as a candidate species are afforded the same protection as CESA-listed species. Take of any CESA listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). The California State legislature has enacted the Western Joshua Tree Conservation Act (WJTCA), which aims to provide protection of WJT and provides another permitting mechanism for the incidental take of WJT. For unavoidable impacts, Parks shall consult with CDFW and obtain appropriate take authorization under CESA or the WJTCA.	Prior to Project Initiation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #5: CESA ITP – CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. In regard to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity for the duration of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, Parks shall seek appropriate take authorization under CESA prior to implementing or continuing the Project. Appropriate authorization from CDFW may include an ITP, or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts to CESA listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals shall be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.	Prior to Project Initiation	Project Proponent
Mitigation Measure #6: Trail Plan – Parks shall develop a Road and Trails Management Plan (Plan) to govern the development of new trails. The Plan shall include details regarding the installation of appropriate signage and trash receptacles, allowable and prohibited trail uses, and best management practices. Additionally, fence installation and maintenance associated with trail creation and operation may obstruct wildlife movement and result in wildlife injury or mortality due to impalement	Prior to Project Initiation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
and/or entanglement (e.g., chain-link fencing). Therefore, the Plan shall include wildlife-friendly fencing and design plans.		
Mitigation Measure #7: Public Education – Parks shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.	Project Operation	Project Proponent
Mitigation Measure #8: Trash – All trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	Project Operation	Project Proponent
Mitigation Measure #9: Activity Restriction – Parks shall place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets shall always be kept on leash and on designated public and pet friendly trails. Hikers shall be encouraged to clean up after their dogs and discourage leaving animal waste as it tends to lead to wildlife avoidance.	Prior to Project Initiation	Project Proponent
Mitigation Measure #10: Compensatory Mitigation – Based on the new impacts identified and disclosed in Recommendation #1) Biological Assessment Surveys, Parks shall provide commensurate compensatory mitigation to offset the temporal and	After Project Completion	Project Proponent

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Mitigation Measure	Timing	Responsible Party
permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.		
Mitigation Measure #11: Incidental Take Permit – If Crotch’s bumble bee is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 <i>et seq.</i>). Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact Crotch’s bumble bee.	Prior to Project Initiation	Project Proponent
Mitigation Measure #12: Crotch’s Bumble Bee Surveys – Parks shall retain a qualified biologist with the appropriate experience and/or handling permits to conduct focused surveys for Crotch’s Bumble Bee. Focused surveys shall follow CDFW’s Survey Conditions for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and adjacent areas during the appropriate flying season to ensure no missed detection of Crotch’s bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing activities.	Prior to Project Initiation	Project Proponent
Mitigation and Monitoring Reporting Plan. CDFW recommends the Project’s environmental document include 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 Lead Agency is welcome to coordinate with CDFW to further review and refine the Project’s mitigation	Prior to FEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
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).		
Scientific Collecting Permit. Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. The Project proponent should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits ²² webpage for information (CDFW 2025c).	Prior to Project Initiation	Project Proponent
Lake and Streambed Alteration: The Project activities, as described, have the potential to temporarily and permanently impact hydrological features within the Hungry Valley SVRA and are subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 et seq. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b)	Prior to Project Initiation	Project Proponent

²² <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>

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Mitigation Measure	Timing	Responsible Party
substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. “Any river, stream, or lake” includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins. CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW’s LSA webpage²³.		
Recommendation #1: Biological Assessment Surveys – The Final Environmental Impact Report (FEIR) should include updated biological field surveys that accurately describe the current state of the Project site and adjacent areas, as well as provide a comprehensive inventory of biological species that may be present within the Project site and adjacent areas. Surveys should be conducted at the appropriate time of year and time of day when sensitive species are active, or otherwise identifiable, for both plants and wildlife. Based on the survey results, the FEIR should propose avoidance and mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the FEIR for public review.	Prior to FEIR	Lead Agency
Recommendation #2: Buffer Determination – Parks should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment,	Prior to FEIR	Lead Agency

²³ <https://wildlife.ca.gov/Conservation/LSA>

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etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the FEIR.		
Recommendation #3: Recreation Discussion – The FEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence wildlife’s spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes and electric bikes (e-bikes) on biological resources. Specifically, e-bikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts. The FEIR should provide an analysis of impacts that may result from the use of e-bikes, as well as provide mitigation measures for their use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.	Prior to FEIR	Lead Agency
Recommendation #4: Fencing Designs – Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends A Landowner’s Guide to Wildlife Friendly Fences for information about wildlife-friendly fences (MFWP 2012).	Prior to FEIR	Lead Agency

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Recommendation #5: Crotch's Bumble Bee Discussion – The FEIR should acknowledge that Crotch's bumble bee are designated as a CESA candidate species and afforded full protection under CESA. If the Project may impact Crotch's bumble bee, the FEIR should incorporate measures to mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA ITP can be issued based on the analysis provided in the FEIR.	Prior to FEIR	Lead Agency
Recommendation #6: Western Burrowing Owl Discussion – The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.	Prior to FEIR	Lead Agency