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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
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South Coast Region
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September 29, 2026

Brandi Jones
Senior Planner
City of Irwindale
5050 N Irwindale Ave
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Subject: Draft Environmental Impact Report for the Irwindale Brew Yard Specific Plan Project, SCH No. 2024020415, Los Angeles County, CA

Dear Brandi Jones:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the City of Irwindale (City) for the Irwindale Brew Yard Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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

[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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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 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 law[2] 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: PlaceWorks

Objective: The objective of the Brew Yard Specific Plan (Project) is to fill two quarries and construct two separate planning areas that would allow for a range of development types. The planning areas would replace the previous M-2 (Heavy Industrial) zoning designation. The northwestern quarry would require approximately 6 million cubic yards to fill, and the southeastern quarry would require approximately 2 million cubic yards to fill. Primary Project activities include filling and grading.

Location: The 150.1-acre Project area is in the northeast portion of the City of Irwindale, Los Angeles County, California.

Biological Setting: The study area is directly adjacent to the Santa Fe Dam Recreation Area and includes lands historically used for sand and gravel mining. The study area contains two mining excavation sites, one site on the west side and a second site on the east side. The east pit has not been active for over 77 years. The west pit remained active through the mid- to late-1960's. Each excavation pit is surrounded by a terrace of upland vegetation. The west pit terrace historically supported a scrub and chaparral community but has been ripped and grubbed for fire fuel modification, most recently in February 2025. The interior of the west pit predominantly supports coastal sage scrub and chaparral scrub species including California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*), and laurel sumac (*Malosma laurina*). The eastern pit comprises similar vegetation communities but also includes Peruvian pepper trees (*Schinus molle*), fountain grass (*Pennisetum* sp.), and a small community of Goodding's willow (*Salix gooddingii*) trees in the

[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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bottom of the excavated pit. Between the excavations is a developed space used for commercial vehicle parking, materials storage, and the staging of materials. To the southwest of the east pit is infrastructure that supported a series of dismantled solar arrays.

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

COMMENT # 1: Impacts to Alluvial Fan Sage Scrub

Issue: The Project will impact Alluvial Fan Sage Scrub, which is a Sensitive Vegetation Community.

Specific impact: The Project proposes to grade a Sensitive Vegetation Community, Alluvial Fan Sage Scrub, for development. There is very little acreage of Alluvial Fan Sage Scrub remaining; therefore removal would be detrimental to the long-term viability of this habitat.

Why impact would occur: Alluvial Scrub is a general term for a distinctive and declining natural community that occurs mainly on alluvial fans and floodplains in Southern California. This community was once fairly common in the region, but it is now restricted to scattered fragments, due to urbanization and channelization of streams and alterations in the natural hydrology which maintain appropriate growing conditions along streams and rivers (Hanes et al., 1989). The term "alluvium" refers to the substrate where this natural community is found- namely, it occurs on flood-deposited alluvium located in, along or near active rivers and streams. The term "scrub" refers to the growth form of the vegetation- namely, low growing species of shrubs. Naturally occurring Alluvial Scrub is known to support a diverse array of plant species including evergreen shrubs common to chaparral habitats and drought-deciduous shrubs and subshrubs found in coastal sage scrub habitats. Because these habitats can support a wide blend of different plant species, they are recognized as supporting a structural complexity unrivaled amongst other shrub-dominated communities in Southern California (Kirkpatrick and Hutchinson, 1977). This structural complexity (low growing shrubs, taller shrubs, small scattered trees, annual wildflowers, etc) provides important habitat for an array of insect, reptile, avian and small mammal species some of which are locally rare and uncommon themselves.

In 1989, Hanes et al described Alluvial Fan Scrub as a unique and threatened vegetation type in coastal southern California. This habitat is considered a Sensitive Natural Community per the California Natural Diversity Data Base. Rankings of S1 through S3 are considered rare in addition to being considered a Sensitive Natural Community. CEQA Guidelines section 15125(c) states that Lead Agencies should emphasize in their analysis resources that are rare

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or unique to the region and EIR must demonstrate that the significant environmental impacts of the proposed Project were adequately investigated and discussed. The DEIR did not identify the Alluvial Fan Scrub as rare and unique resource. Therefore, this habitat was not analyzed as such within the EIR as required by CEQA. In addition, the DEIR did not analyze the regional significance of impacting the last stand of Alluvial Scrub on the San Gabriel fan as required by CEQA Guidelines section 15125(c). There is very little acreage of Alluvial Fan Sage Scrub remaining; therefore providing adequate mitigation to offset the Project's impacts will be difficult and likely result in substantial loss.

The Project impacts the San Gabriel alluvial fan, which has been mostly developed over time. Besides the Santa Fe Dam Recreation Area, this Project impacts the remaining Alluvial Scrub in the area. The DEIR includes a cumulative impacts analysis that "identifies cumulative development projects within the vicinity of the project site that are planned, under construction, or recently completed". This analysis does not account for older projects that have historically developed the San Gabirel alluvial fan and could result in a substantial cumulative impact.

The DEIR does not include measures to fully avoid the remaining Alluvial Scrub from project-related impacts. Additionally, there is no indication that any Alluvial Scrub would be protected on site. CDFW is concerned that if the Project does not protect as much Alluvial Scrub as possible, the community will be imperiled further.

Evidence impact may be significant: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish and Game Code § 1940). This standard complies with the National Vegetation Classification System which utilizes alliance and association-based classification of unique vegetation stands. The vegetation descriptions found in the Manual of California Vegetation (MCV)[3] are available to meet the analytical needs of government and nongovernment entities. 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 (Pub. Resources Code § 21070).

Recommended Potentially Feasible Mitigation Measure(s)

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

Recommendation #1: Avoidance. The DEIR discusses buffer areas and areas where ornamental vegetation will be planted. The Project should fully avoid and protect as much of the remaining Alluvial Scrub as possible from project-related impacts. In an effort to

[3] http://vegetation.cnps.org/

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maintain as much of the extremely rare habitat as possible, CDFW recommends requiring the Alluvial Fan Sage Scrub, and any native vegetation communities, to be protected in buffer areas and ornamental vegetation only planted in the interior of the Project.

Recommendation #2: Cumulative Effects Analysis. The Project impacts the remaining Alluvial Scrub in the San Gabriel alluvial fan. The cumulative analysis in the DEIR only identifies development projects within the vicinity that are "planned, under construction, or recently completed". This analysis does not account for older projects that have historically developed the San Gabirel alluvial fan. The cumulative effects analysis should be revised to account for historical projects in the area that have developed the San Gabirel alluvial fan and incorporated in the EIR.

Recommendation #3: Santa Fe Dam Recreation Area Conservation. Since there is very little alluvial fan sage scrub habitat left in the San Gabriel Wash, finding mitigation opportunities might prove difficult. Other than the Project area, the remaining Alluvial Fan Sage Scrub is currently conserved at Santa Fe Dam Recreation Area (SFRA). CDFW recommends the following possible mitigation solution. Work in partnership with the Santa Fe Dam Nature Center, the California Native Plant Society, or local non-profit to develop and implement a habitat management plan for the SFRA to support the remaining Alluvial Fan Sage Scrub habitat. This plan would include monitoring invasives, seed collection, and revegetation projects after disturbance. The plan should be funded by a non-wasting endowment to maintain this effort in perpetuity.

Mitigation Measure #1: Habitat Mitigation and Monitoring Plan. The Project proponent shall compensate for the loss of Alluvial Fan Sage Scrub due to this Project. Due to the lack of availability of this rare community, impacts shall be mitigated between a 5:1 and 10:1 ratio, depending on the mitigation type, location, and quality. The Project proponent shall prepare a Habitat Mitigation and Monitoring Plan (HMMP) on site and at any off-site location identified. The HMMP shall detail relocation, salvage, and/or restoration of impacted species and subsequent maintenance and monitoring, payment to an agency approved mitigation bank, or acquisition of off-site lands to be protected under a conservation easement in perpetuity. The HMMP shall outline initial and long-term management and maintenance activities that would occur on mitigation lands. The HMMP shall provide measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Maintenance activities outlined in the HMMP shall include measures pertaining to control of non-native invasive vegetation, irrigation schedule, and protection from future disturbance or maintenance activities.

COMMENT # 2: Species Surveys

Issue: The Project may impact species during grading activities.

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Specific impact: Species surveys were conducted at the Project site after vegetation removal. Therefore, the survey results are not comprehensive of what species would be on the Project site under normal habitat conditions. Thus, the Project may impact more species than what is listed in the DEIR, and grading activities could directly impact species that were missed during surveys.

Why impact would occur: The Project conducted species occurrence surveys after clearing a significant amount of habitat from the Project area. The DEIR states that the west pit terrace was "ripped and grubbed for fire fuel modification in February 2025." There is no further detail provided about this event. Following the approximately 15 acres of fuel modification in February 2025, rare plant surveys and Crotch's Bumble Bee (CBB) focused surveys were conducted in April and July of 2025. A focused survey for California Gnatcatcher (CAGN) was conducted between April and May 2025. The reduction of habitat alters the occurrence and abundance of these species, therefore the survey results are not indicative of what normally would inhabit this area.

Additionally, during the 2024 Burrowing Owl (BUOW) habitat assessment, potentially suitable habitat was identified. However, the focus surveys for BUOW were conducted after the vegetation was removed in February 2025. The DEIR states "Several earthen burrows that could potentially be used by BUOW were observed within the Project site; therefore, focused surveys were completed between April and July 2025." Thus, these survey results would not depict accurate information regarding species known to be present in unmodified Alluvial Fan Sage Scrub habitat.

In addition, it is unclear to CDFW if the vegetation clearing event followed the correct fuel modification guidelines. LA County Fire Department fuel modification guidelines typically follow a 100-foot clearing zone around structures, and thinning of vegetation beyond 100 feet. Looking at satellite photos of the west pit terrace from Google Earth, significantly more than 100 feet of native vegetation was cleared from the area in February 2025.

Evidence impact would be significant: All of the focused surveys for Rare Plants, CBB, BUOW, and CAGN were conducted immediately after 15 acres of habitat were removed for fuel modification in February 2025. Thus, the fuel modification would have already impacted these special status species and habitat, two of which are candidates under the California Endangered Species Act (CESA).

CBB and BUOW are both 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 an individual 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,

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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 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:

Recommendation #4: Additional Details of Fuel Modification. The City should provide further details of the February 2025 clearing event to CDFW. The DEIR should provide a detailed description of the proposed fire fuel modification clearing event, including its purpose, location, total acreage, vegetation communities affected, and methods of vegetation removal or modification. The DEIR should also describe the relationship of the clearing event to the proposed Project, applicable fire authority requirements, and any associated permits or regulatory approvals.

Recommendation #5: Analyze the Fuel Modification Impacts as part of the DEIR. The DEIR should discuss any potential species occurrence that may have been present before the February 2025 clearing event and re-analyze the environmental impacts to include what species are normally occurring. Additionally, the DEIR should provide mitigation for impacts based on the updated, accurate analysis.

Recommendation #6: Take of Listed Animal or Plant Species. If a state and/or federally listed animal or plant species is present, the City should consult with CDFW and/or the U.S. Fish and Wildlife Service (USFWS) prior to initiating any Project activities.

Mitigation Measure #2: Listed Plant Species. The City shall conduct protocol surveys for any rare, threatened or endangered plant species with any potential to occur on the Project site prior to Project activities. Surveys shall follow CDFW's protocol when assessing the site for Rare, Threatened, and Endangered botanical resources. Survey results shall be provided to CDFW within two weeks of survey completion.

ADDITIONAL COMMENTS

Recommendation #7: Proposed Planting Palette for the Project. CDFW recommends the City's proposed planting palette for the landscape buffer also include additional California species deemed fire-resistant by the local or regional fire department, such as common yarrow (*Achillea millefolium*), bladderpod (*Isomeris arborea*), quail bush (*Atriplex lentiformis breweri*), ocotillo (*Fouquieria splendens*), catclaw acacia (*Senegalia greggii*), brittle bush (*Encelia farinosa*), coast sunflower (*Encelia californica*), Prince's plume (*Stanleya pinnata*),

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coffeeberry (*Frangula californica*), hollyleaf cherry (*Prunus ilicifolia*), Creosote bush (*Larrea tridentata*), and rubber rabbitbrush (*Ericameria nauseosa*).

Recommendation #8: Weed Management Plan. CDFW recommends the City develop a weed management plan for the Project area and implement it during construction and throughout the life of the Project. Non-native weeds should be prevented from becoming established during and after construction to control the spread of invasive plants. The Project area should be monitored (via mapping) for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring the potential spread of invasive weeds onto adjacent land should also be included.

Recommendation #9: Best Management Practices for Irrigation. CDFW recommends that any irrigation proposed by the City for the landscape buffers drain back into the development and not onto natural habitat land. Irrigation should only be used if an individual plant is stressed and it should be limited to the first year (in the installation phase). Temporary or permanent irrigation should not be installed, because only individual plants under stress should be targeted for watering. Hand watering is preferred. If a temporary irrigation system must be installed it should not be connected to a water source and should not be on a timer. The water source (water truck) should only be connected to the irrigation system while it is in use. A system left on a timer should never be used as this creates an unnatural hydrologic regime and more robust growth than would normally be supported by the existing sites.

Recommendation #10: Lake and Streambed Alteration (LSA). The DEIR acknowledges that an LSA notification will need to be submitted to CDFW. CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.

Recommendation #11: 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 measures. Per Public Resources Code

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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 (CNDDB). The CNDDB website[4] 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[5].

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 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 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)).

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[4] https://wildlife.ca.gov/Data/CNDDB
[5] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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Questions regarding this letter or further coordination should be directed to Andrew Aitken[6], Environmental Scientist.

Sincerely,

DocuSigned by:
5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Erika Cleugh, Senior Environmental Scientist (Supervisor)
Andrew Aitken, Environmental Scientist

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

REFERENCES

Hanes, T. L., Friesen, R. D., & Keane, K. (1989). ALLUVIAL SCRUB VEGETATION IN COASTAL SOUTHERN CALIFORNIA1. In *CALIFORNIA RIPARIAN SYSTEMS CONFERENCE* (p. 187).

Kirkpatrick, J.B., Hutchinson, C.F. (1977) The community composition of Californian coastal sage scrub. *Plant Ecol* **35**, 21–33.

Smith, R.L. (1980). Alluvial scrub vegetation of the San Gabriel River floodplain, California. *Madro–o* **27**: 126–138.

[6] Phone562-525-9688; Email: Andrew.Aitken@wildlife.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: Habitat Mitigation and Monitoring Plan. The Project proponent shall compensate for the loss of Alluvial Fan Sage Scrub due to this Project. Due to the lack of availability of this rare community, impacts shall be mitigated between a 5:1 and 10:1 ratio, depending on the mitigation type, location, and quality. The Project proponent shall prepare a Habitat Mitigation and Monitoring Plan (HMMP) on site and at any off-site location identified. The HMMP shall detail relocation, salvage, and/or restoration of impacted species and subsequent maintenance and monitoring, payment to an agency approved mitigation bank, or acquisition of off-site lands to be protected under a conservation easement in perpetuity. The HMMP shall outline initial and long-term management and maintenance activities that would occur on mitigation lands. The HMMP shall provide measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Maintenance activities outlined in the HMMP shall include measures pertaining to control of non-native invasive vegetation, irrigation schedule, and protection from future disturbance or maintenance activities.	Prior to adoption of the DEIR	Lead Agency
Mitigation Measure #2: Listed Plant Species. The City shall conduct protocol surveys for any rare, threatened or endangered plant species with any potential to occur on the Project site prior to Project activities. Surveys shall follow CDFW's protocol when assessing the site for Rare, Threatened, and Endangered botanical resources. Survey results shall be provided to CDFW within two weeks of survey completion.	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Recommendation #1: Avoidance. The DEIR discusses buffer areas and areas where ornamental vegetation will be planted. The Project should fully avoid and protect as much of the remaining Alluvial Scrub as possible from project-related impacts. In an effort to maintain as much of the extremely rare habitat as possible, CDFW recommends requiring the Alluvial Fan Sage Scrub, and any native vegetation communities, to be protected in buffer areas and ornamental vegetation only planted in the interior of the Project.	Prior to adoption of the DEIR	Lead Agency
Recommendation #2: Cumulative Effects Analysis. The Project impacts the remaining Alluvial Scrub in the San Gabriel alluvial fan. The cumulative analysis in the DEIR only identifies development projects within the vicinity that are "planned, under construction, or recently completed". This analysis does not account for older projects that have historically developed the San Gabirel alluvial fan. The cumulative effects analysis should be revised to account for historical projects in the area that have developed the San Gabirel alluvial fan and incorporated in the EIR.	Prior to adoption of the DEIR	Lead Agency
Recommendation #3: Santa Fe Dam Recreation Area Conservation. Since there is very little alluvial fan sage scrub habitat left in the San Gabriel Wash, finding mitigation opportunities might prove difficult. Other than the Project area, the remaining Alluvial Fan Sage Scrub is currently conserved at Santa Fe Dam Recreation Area (SFRA). CDFW recommends the following possible mitigation solution. Work in partnership with the Santa Fe Dam Nature Center, the California Native Plant Society, or local non-profit to develop and implement a habitat management plan for the SFRA to support the remaining Alluvial Fan Sage Scrub habitat. This plan would include monitoring invasives, seed	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
collection, and revegetation projects after disturbance. The plan should be funded by a non-wasting endowment to maintain this effort in perpetuity.		
Recommendation #4: Additional Details of Fuel Modification. The City should provide further details of the February 2025 clearing event to CDFW. The DEIR should provide a detailed description of the proposed fire fuel modification clearing event, including its purpose, location, total acreage, vegetation communities affected, and methods of vegetation removal or modification. The DEIR should also describe the relationship of the clearing event to the proposed Project, applicable fire authority requirements, and any associated permits or regulatory approvals.	Prior to adoption of the DEIR	Lead Agency
Recommendation #5: Analyze the Fuel Modification Impacts as part of the DEIR. The DEIR should discuss any potential species occurrence that may have been present before the February 2025 clearing event and re-analyze the environmental impacts to include what species are normally occurring. Additionally, the DEIR should provide mitigation for impacts based on the updated, accurate analysis.	Prior to adoption of the DEIR	Lead Agency
Recommendation #6: Take of Listed Animal or Plant Species. If a state and/or federally listed animal or plant species is present, the City should consult with CDFW and/or the U.S. Fish and Wildlife Service (USFWS) prior to initiating any Project activities.	Prior to Project Activities	Lead Agency
Recommendation #7: Proposed Planting Palette for the Project. CDFW recommends the City's proposed planting palette for the landscape buffer also include additional California species deemed fire-resistant by the local or regional fire department, such as common yarrow (*Achillea millefolium*), bladderpod (*Isomeris arborea*), quail bush (*Atriplex lentiformis breweri*), ocotillo	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
(*Fouquieria splendens*), catclaw acacia (*Senegalia greggii*), brittle bush (*Encelia farinosa*), coast sunflower (*Encelia californica*), Prince's plume (*Stanleya pinnata*), coffeeberry (*Frangula californica*), hollyleaf cherry (*Prunus ilicifolia*), Creosote bush (*Larrea tridentata*), and rubber rabbitbrush (*Ericameria nauseosa*).		
Recommendation #8: Weed Management Plan. CDFW recommends the City develop a weed management plan for the Project area and implement it during construction and throughout the life of the Project. Non-native weeds should be prevented from becoming established during and after construction to control the spread of invasive plants. The Project area should be monitored (via mapping) for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring the potential spread of invasive weeds onto adjacent land should also be included.	Prior to adoption of the DEIR	Lead Agency
Recommendation #9: Best Management Practices for Irrigation. CDFW recommends that any irrigation proposed by the City for the landscape buffers drain back into the development and not onto natural habitat land. Irrigation should only be used if an individual plant is stressed and it should be limited to the first year (in the installation phase). Temporary or permanent irrigation should not be installed, because only individual plants under stress should be targeted for watering. Hand watering is preferred. If a temporary irrigation system must be installed it should not be connected to a water source and should not be on a timer. The water source (water truck) should only be connected to the irrigation system while it is in use. A system left on a timer	Prior to adoption of the DEIR	Lead Agency

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Mitigation Measure	Timing	Responsible Party
should never be used as this creates an unnatural hydrologic regime and more robust growth than would normally be supported by the existing sites.		
Recommendation #10: Lake and Streambed Alteration (LSA). The DEIR acknowledges that an LSA notification will need to be submitted to CDFW. CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.	Prior to adoption of the DEIR	Lead Agency