



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
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August 7, 2026

Jodie Sackett
County of Los Angeles Department of Regional Planning
Subdivisions Section
320 West Temple Street
Los Angeles, CA 90012
subdivisions@planning.lacounty.gov

Subject: Recirculated Partial Draft Environmental Impact Report for the Centennial Specific Plan Project, SCH No. 2024031142, Los Angeles County, CA

Dear Jodie Sackett:

The California Department of Fish and Wildlife (CDFW) reviewed the Recirculated Partial Draft Environmental Impact Report (RPDEIR) from Los Angeles County (County) for the Centennial Specific Plan Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

Jodie Sackett
Los Angeles County
August 7, 2026
Page 2

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 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: Centennial Founders LLC

Objective: The Project involves the development of a master planned community with 19,333 residential units. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses encompass approximately 1,568,160 sf on approximately 110 acres.

The primary purpose of this Recirculated Partial Draft EIR is to revise portions of the Centennial EIR to address the deficiencies identified by the Court of Appeal in the Opinion so as to ensure that the Centennial EIR evaluates the potential environmental effects of the Project in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This Recirculated Partial Draft EIR is intended to inform decision makers and the public regarding the Project's potential to result in significant environmental impacts related to Climate Change, Wildfire, and Biological Resources (Crotch's bumble bee), to identify feasible mitigation measures that may minimize such impacts, and to facilitate informed agency decisions regarding the Project.

Location: The 12,323-acre Project site is located in the northwestern portion of Antelope Valley in unincorporated Los Angeles County and is contiguous with the southern boundary of Kern County.

Biological Setting: The Project site is characterized by moderate to steep hills and canyons with oak woodlands and riparian areas west of the West Branch of the California Aqueduct, and by open, gently sloping mesa grasslands dissected by a network of arroyos east of the Aqueduct. Elevations range from approximately 3,000 feet above mean sea level (msl) on the Antelope Valley floor in the northeastern portion of the site to approximately 4,350 feet above msl in the southwestern portion of the property. The Tehachapi Mountains border the

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 3

site to the north and west, and the San Gabriel Mountains are located south of the Project site

The Project site is one of the largest remaining perennial and annual grassland habitat areas in Los Angeles County. Vegetation communities known to occur on the Project site include, but are not limited to, Wright's buckwheat scrub, mixed oak woodland, alluvial scrub, cottonwood woodland, riparian herb, rush riparian grassland, southern arroyo willow riparian, southern cottonwood-willow woodland, southern willow scrub, valley oak riparian woodland, unvegetated wash, willow riparian forest, willow riparian woodland, alkali meadow, Baltic rush, coastal and valley freshwater marsh, seeps and ephemeral ponds, native perennial grasslands, wildflower fields, and native and nonnative annual grasslands.

In the previous Draft Environmental Impact Report for the Centennial Project (DEIR; County of Los Angeles, 2017), LA County Planning identified 40 special-status invertebrate, fish, amphibian, reptile, bird, and mammal species observed or with potential habitat within the Project site. Species potentially occurring within the Project site that are listed under the Endangered Species Act (ESA) as threatened or endangered or proposed for listing under the ESA as threatened or endangered, and/or listed under the California Endangered Species Act (CESA) as threatened, endangered, or candidate species include:

- conservancy fairy shrimp (*Branchinecta conservatio*; ESA-listed endangered)
- vernal pool fairy shrimp (*Branchinecta lynchi*; ESA-listed threatened)
- Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered species)
- Tehachapi slender salamander (*Batrachoseps stebbinisi*; CESA-listed threatened)
- western spadefoot (*Spea hammondi*; proposed for ESA threatened listing)
- arroyo toad (*Anaxyrus californicus*; California Species of Special Concern (SSC) ESA-listed endangered)
- California red-legged frog (SSC, ESA-listed threatened)
- western pond turtle (*Emys marmorata*; SSC, proposed for ESA threatened listing)
- California condor (*Gymnogyps californianus*; CESA-listed endangered, ESA-listed endangered, State fully protected)
- Swainson's hawk (*Buteo swainsoni*; CESA-listed threatened)
- bald eagle (*Haliaeetus leucocephalus*; CESA-listed endangered, State fully protected)
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; CESA-listed endangered, ESA-listed threatened)
- California spotted owl (*Strix occidentalis occidentalis*; SSC, proposed for ESA listing as endangered)
- southwestern willow flycatcher (*Empidonax trillii extimus*; CESA-listed endangered, ESA-listed endangered)
- least Bell's vireo (*Vireo bellii pusillus*; CESA-listed endangered, ESA-listed endangered)

Jodie Sackett
Los Angeles County
August 7, 2026
Page 4

- tricolored blackbird (*Agelaius tricolor*; CESA-listed threatened)
- mountain lion (*Puma concolor*; CESA-listed threatened)
- western burrowing owl (*Athene cunicularia hypugaea*; CESA candidate threatened or endangered species)

The 2017 DEIR also identified 30 special-status plant species with the potential to occur within the Project site. Plants with a California Rare Plant Rank (CRPR) of 1B.2 or higher, ESA-listed threatened, and/or NPPA-listed Rare include:

- round-leaved filaree (*California macrophylla*; CRPR 1B.2)
- slender mariposa lily (*Calochortus clavatus* var. *gracilis*; CRPR 1B.2)
- late-flowered mariposa lily (*Calochortus fimbriatus*; CRPR 1B.2)
- Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*; CRPR 1B.2)
- Mt. Gleason paintbrush (*Castilleja gleasoni*; NPPA-listed Rare, CRPR 1B.2)
- Lemmon's jewel flower (*Caulanthus lemmonii*; CRPR 1B.2)
- Tehachapi buckwheat (*Eriogonum callistum*; CRPR 1B.1)
- Fort Tejon woolly sunflower (*Eriophyllum lanatum* var. *hallii*; CRPR 1B.1)
- Tejon poppy (*Eschscholzia lemmonii* ssp. *kernensis*; CRPR 1B.1)
- spreading navarretia (*Navarretia fossalis*; ESA-listed threatened, CRPR 1B.1)
- Baja navarretia (*Navarretia peninsularis*; CRPR 1B.2)
- Piute Mountains navarretia (*Navarretia setiloba*; CRPR 1B.2)
- Robbins' nemacladus (*Nemacladus secundiflorus* var. *robbinsii*; CRPR 1B.2)
- San Bernardino aster (*Symphyotrichum defoliatum*; CRPR 1B.2)

Lastly, critical Habitat for the California condor occurs immediately adjacent to the northern boundary of the Project site.

History: CDFW had previously provided comments on an early consultation at the request of the County. Comments included, but were not limited to, rare plants, special-status wildlife, streams and wetlands, and project description and alternatives. CDFW also provided comments for the Notice of Preparation, which included but were not limited to special-status wildlife, fire impacts, and updated biological surveys.

COMMENTS AND RECOMMENDATIONS

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

Jodie Sackett
Los Angeles County
August 7, 2026
Page 5

COMMENT # 1: Human-Wildlife Conflict

Issue: The Project will increase human-wildlife conflicts.

Specific impact: The Project will be constructing a master planned community within and adjacent to wildlife habitat, which can increase interactions between people and wildlife.

Why impact would occur: Development adjacent to or within wildlife habitat can increase interactions between people and wildlife, resulting in property damage, public safety concerns, wildlife displacement, and increased demand for wildlife management services.

Elevated pedestrian presence is likely to create direct and indirect impacts to local wildlife species through the loss of potential habitat and encounters with wildlife. This has potential to impact sensitive wildlife species and their habitat through a variety of ways:

- loss of habitat due to erosion from footpaths
- increased noise levels
- increased trash or pet waste
- introduction of unnatural food sources via pet food, trash and trash receptacles
- introduction of unnatural water sources via pets, ponds, and pools
- introduction of invasive species from other sites
- potential for disease transmission between wildlife and domestic animals
- predation of wildlife by domestic animals

Evidence impact may be significant: The Project has the potential to significantly increase human-wildlife conflicts, resulting in adverse impacts to biological resources. Increased development and human activity may lead to higher wildlife mortality from vehicle collisions, unauthorized take, or wildlife removal actions undertaken in response to conflicts. The Project may also disrupt wildlife movement and habitat use by causing animals to abandon suitable habitat, alter established movement corridors, or become isolated in fragmented habitat patches. As conflicts become more frequent, wildlife may be subject to repeated capture, relocation, or, in some cases, euthanasia, which can adversely affect local wildlife populations and the ecological functions they support. These impacts may be compounded by other existing and planned developments in the surrounding area, creating cumulative effects through continued habitat fragmentation and increased human presence. In addition, the Project may necessitate ongoing wildlife management measures, such as fencing, exclusion devices, trapping, relocation, or habitat modification, each of which has

Jodie Sackett
Los Angeles County
August 7, 2026
Page 6

the potential to result in additional environmental impacts. Accordingly, these reasonably foreseeable effects should be fully analyzed in the RPDEIR, and the project should include enforceable, long-term mitigation measures supported by a dedicated funding mechanism to ensure that future human-wildlife conflicts are effectively managed throughout the life of the project.

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #1: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat.

At a minimum, the WCMP shall include:

- Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal deterrence, and protection of wildlife and public safety.
- Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution.
- Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife.
- Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate, public education, and maintenance requirements.
- Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary.
- Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 7

Mitigation Measure #2: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address project-related human-wildlife conflicts, without reliance on public agency funding.

COMMENT # 2: Updated Special Status Species Surveys

Issue: The Project will impact special status species or their habitat.

Specific impact: Implementation of the master planned community will impact special status species or their habitat.

Why impact would occur: Various biological surveys were conducted between 1999 and 2015 in support of the analysis discussed in the 2017 DEIR. Species potentially occurring within the Project site that are listed under the Endangered Species Act (ESA) as threatened or endangered or proposed for listing under the ESA as threatened or endangered, and/or listed under the California Endangered Species Act (CESA) as threatened, endangered, or candidate species include:

- conservancy fairy shrimp (*Branchinecta conservatio*; ESA-listed endangered)
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- California spotted owl (*Strix occidentalis occidentalis*; SSC, proposed for ESA listing as endangered)

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 8

- southwestern willow flycatcher (*Empidonax trillii extimus*; CESA-listed endangered, ESA-listed endangered)
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The 2017 DEIR also identified 30 special-status plant species with the potential to occur within the Project site. Plants with a California Rare Plant Rank (CRPR) of 1B.2 or higher, ESA-listed threatened, and/or NPPA-listed Rare include:

- round-leaved filaree (California macrophylla; CRPR 1B.2)
- slender mariposa lily (Calochortus clavatus var. gracilis; CRPR 1B.2)
- late-flowered mariposa lily (Calochortus fimbriatus; CRPR 1B.2)
- Palmer's mariposa lily (Calochortus palmeri var. palmeri; CRPR 1B.2)
- Mt. Gleason paintbrush (Castilleja gleasoni; NPPA-listed Rare, CRPR 1B.2)
- Lemmon's jewel flower (Caulanthus lemmonii; CRPR 1B.2)
- Tehachapi buckwheat (Eriogonum callistum; CRPR 1B.1)
- Fort Tejon woolly sunflower (Eriophyllum lanatum var. hallii; CRPR 1B.1)
- Tejon poppy (Eschscholzia lemmonii ssp. kernensis; CRPR 1B.1)
- spreading navarretia (Navarretia fossalis; ESA-listed threatened, CRPR 1B.1)
- Baja navarretia (Navarretia peninsularis; CRPR 1B.2)
- Piute Mountains navarretia (Navarretia setiloba; CRPR 1B.2)
- Robbins' nemacladus (Nemacladus secundiflorus var. robbinsii; CRPR 1B.2)
- San Bernardino aster (Symphyotrichum defoliatum; CRPR 1B.2)

Generally, CDFW considers two years to be the life span of surveys for most sensitive species. Relying on outdated surveys may result in missed detection of special status species. Additionally, if the Project proceeds without appropriate special status species focused surveys, the Project may result in mortality and/or injury of undetected individuals that may be present during Project activities. It is also possible that special status species may utilize the proposed Project site as foraging habitat. Project may result in habitat loss or lead to potential take of special status species.

Evidence impact may be significant: 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 special status species and their habitat is

Jodie Sackett
Los Angeles County
August 7, 2026
Page 9

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 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 #3: Special Status Species Surveys – The Project proponent shall retain a qualified biologist to conduct updated focused surveys for special status species that have the potential to occur on the Project site. Focused surveys shall be conducted pursuant to CDFW's most recent [survey and monitoring protocol guidance](#).

Mitigation Measure #4: Incidental Take Permit - If there is potential for take of a special status species, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the lead agency prior to implementing Project ground-disturbing activities.

ADDITIONAL COMMENTS

Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

Translocation/Salvage of Plants and Animal Species. Translocation and transplantation are the processes of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered,

Jodie Sackett
Los Angeles County
August 7, 2026
Page 10

rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.

Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related 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). 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). For more information, please see CDFW's Scientific Collecting Permit webpage¹.

Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies². Through its Wetlands Resources policy, the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

- a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of

¹ [Scientific Collecting Permits](#)

² [Miscellaneous Policies](#)

Jodie Sackett
Los Angeles County
August 7, 2026
Page 11

wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a “no net loss” of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the Project's environmental document and these measures should compensate for the loss of function and value.

Water policy. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

Use of Native Plants and Trees. CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the [California](#)

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 12

[Invasive Plant Council](#)³ CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

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 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 CNDDB. The CNDDB website 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 Form⁴.

³ <https://www.cal-ipc.org/plants/inventory/>

⁴ [Natural Communities — Submitting Information](#)

Jodie Sackett
Los Angeles County
August 7, 2026
Page 13

The County should ensure data collected for the preparation of the Project's environmental document is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 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.)

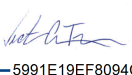
CONCLUSION

CDFW appreciates the opportunity to comment on the RPDEIR to assist the County in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the County 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 Andrew Aitken⁵, Environmental Scientist.

Sincerely,

DocuSigned by:



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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

cc: California Department of Fish and Wildlife

⁵ Email: Andrew.Aitken@wildlife.ca.gov

Jodie Sackett
Los Angeles County
August 7, 2026
Page 14

Victoria Tang, Environmental Program Manager
Steve Gibson, Senior Environmental Scientist (Supervisory)
Andrew Aitken, Environmental Scientist
Cindy Hailey, Staff Services Analyst

REFERENCES

California Fish and Game Commission. 2005. *Miscellaneous Policies*. Retrieved from <https://fgc.ca.gov/About/Policies/Miscellaneous>



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Attachment A. Mitigation Monitoring and Reporting Program (MMRP)

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

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 16

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
Mitigation Measure #1: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat. At a minimum, the WCMP shall include: • Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal deterrence, and protection of wildlife and public safety. • Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution. • Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife. • Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate, public education, and maintenance requirements. • Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary. Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.	Prior to Project Initiation	Project Proponent

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 17

Mitigation Measure #2: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address project-related human-wildlife conflicts, without reliance on public agency funding.	Prior to Project Initiation	Project Proponent
Mitigation Measure #3: Special Status Species Surveys – The Project proponent shall retain a qualified biologist to conduct updated focused surveys for special status species that have the potential to occur on the Project site. Focused surveys shall be conducted pursuant to CDFW's most recent survey and monitoring protocol guidance.	Prior to Project Initiation	Project Proponent
Mitigation Measure #4: Incidental Take Permit - If there is potential for take of a special status species, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the lead agency prior to implementing Project ground-disturbing activities.	Prior to Project Initiation	Project Proponent
Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed	Prior to Project Initiation	Project Proponent

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 18

include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.		
<u>Translocation/Salvage of Plants and Animal Species.</u> Translocation and transplantation are the processes of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.	During Project Construction	Project Proponent
<u>Scientific Collecting Permit.</u> A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related 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). 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	Prior to Project Initiation	Project Proponent

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 19

connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's Scientific Collecting Permit webpage⁶.		
<u>Wetland Resources.</u> CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies⁷. Through its Wetlands Resources policy, the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values." b. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland	Prior to Project Initiation	Project Proponent

⁶ [Scientific Collecting Permits](#)

⁷ [Miscellaneous Policies](#)

Jodie Sackett
 Los Angeles County
 August 7, 2026
 Page 20

resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the Project's environmental document and these measures should compensate for the loss of function and value.		
<u>Water policy.</u> The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).	Prior to Project Initiation	Project Proponent
<u>Use of Native Plants and Trees.</u> CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location	Prior to Project Initiation	Project Proponent

Jodie Sackett
Los Angeles County
August 7, 2026
Page 21

adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', High', Limited', and 'Watch' by the California Invasive Plant Council ⁸ CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (Quercus genus), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.		
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⁸ <https://www.cal-ipc.org/plants/inventory/>

Jodie Sackett
Los Angeles County
August 7, 2026
Page 22

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