

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 27, 2025

Mark Aumentado
Santa Clarita Valley Water Agency
26515 Summit Circle
Santa Clarita, CA 91350
maumentado@scvwa.org

**SUBJECT: MITIGATED NEGATIVE DECLARATION FOR THE LOST CANYON 2A
AND SAND CANYON GROUNDWATER TREATMENT IMPROVEMENTS
PROJECT, SCH NO. 2025041248; SANTA CLARITA VALLEY WATER
AGENCY, LOS ANGELES**

Dear Mark Aumentado:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the Santa Clarita Valley Water Agency (SCVWA; Lead Agency) for the Lost Canyon 2A and Sand Canyon Groundwater Treatment Improvements Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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

CDFW's ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, 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 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: SCVWA

Objective: The Project involves construction of a centralized perfluoroalkyl and polyfluoroalkyl (PFAS) groundwater treatment facility, improvements to the existing Sand Canyon and Lost Canyon 2A wells, replacement of approximately 1,700 feet of 14-inch pipeline along Lost Canyon Road, and the decommissioning of the existing Mitchell 5B and Lost Canyon 2 wells. The Project also proposes various site improvements, including electrical, piping, and access upgrades. The Project would restore the use of the Lost Canyon 2A and Sand Canyon wells and would reduce SCVWA's dependency on imported water. Construction would occur between May 2026 and May 2028. The groundwater treatment and disinfection facility would operate 24 hours per day, 365 days per year. Maintenance activities include daily maintenance staff visits, weekly chemical deliveries, and resin media replacement approximately every 9 to 12 months.

Location: The Project site is approximately 2.7-acres, spanning the following properties and public right-of-way area in Santa Clarita, California:

Assessor's Parcel Number (APN) 2840-006-901: This property is approximately 10 acres in size and is located 250 feet west of the intersection of Sand Canyon Road and Lost Canyon Road and immediately north of Lost Canyon Road. The existing Lost Canyon 2, Lost Canyon 2A, and Sand Canyon wells occur here. The Santa Clara River also runs through the northern portion of this property. Approximately 1.5 acres of the Project occurs within the southern portion of this property.

- **APN 2840-002-901:** This property is approximately 1.1-acres in size and is located 210 feet west of the northern terminus of Sawtooth Lane. The existing Mitchell 5B well occurs here. Approximately 0.02 acre of the overall Project is located on this Property.

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- **Public Right-of-Way of Lost Canyon Road:** The Project includes approximately 1,700 linear feet of right-of-way along Lost Canyon Road, between La Veda Drive and a point 390 feet northeast of the intersection of Humphreys Parkway and Lincoln Place. Approximately 1.2 acres of Project activities will occur here.

Biological Setting: Seven vegetation communities and two land cover types were identified within the study area (Project site and 100-foot buffer). The southern portion of the study area is comprised of a mixture of developed and disturbed areas, such as buildings, Lost Canyon Road, and compacted dirt parking lots along Lost Canyon Road. The study area north of Lost Canyon Road, including the Lost Canyon 2A and Sand Canyon wells and area surrounding the Mitchell 5B well, are comprised of naturally vegetated terraces, lower slopes, and downward slopes of the Santa Clara River.

Thick-leaved yerba santa scrub (*Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. Shrubland Alliance) occurs in the eastern portion of the study area on the eastern terrace of Sand Canyon Creek and north/northeast of the Sand Canyon well within the Santa Clara River floodplain. Big sagebrush scrub (*Artemisia tridentata* Shrubland Alliance) is the largest vegetation community found within the study area and occurs in the eastern portion of the study area between the Lost Canyon 2A well and the Sand Canyon well, extending north into the Santa Clara River. Sparse patches of big sagebrush scrub also exist within the study area directly east of the Lost Canyon 2A well and north of Lost Canyon Road along the southern bank of the Santa Clara River. Scale broom – California buckwheat scrub (*Lepidospartum squamatum* Shrubland Alliance) comprises the entire naturally occurring vegetation community within the western portion of the study area outside of the Project's site. A small patch of Fremont cottonwood forest and woodland (*Populus fremontii* – *Fraxinus velutina* – *Salix gooddingii* Forest and Woodland Alliance) is found within the eastern portion of the study area, south of Lost Canyon Road and along the western bank of Sand Canyon Creek. The understory of this vegetation community appears to be subject to frequent disturbance (i.e., mowing). Rubber rabbitbrush scrub (*Ericameria nauseosa* Shrubland Alliance) occurs throughout the eastern portion of the study area to the north and adjacent to existing development south of the Santa Clara River. Mulefat thickets (*Baccharis salicifolia* Shrubland Alliance) are present within the eastern portion of the study area, north of the existing Sand Canyon well, and are situated between big sagebrush shrub communities and the southern portion of the Santa Clara River. Upland mustards (*Brassica nigra* - *Centaurea* [*solstitialis*, *melitensis*] Herbaceous Semi-Natural Alliance) are found in disturbed portions of the study area (between the compacted dirt lot and the service road), west of the Sand Canyon well site.

Special-status wildlife species with a potential to occur on site or in the Project vicinity include California legless lizard (*Anniella* spp.), coastal whiptail (*Aspidoscelis tigris stejnegeri*) and coast horned lizard (*Rhynchosoma blainvillii*).

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the SCVWA in adequately identifying, avoiding, 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: Groundwater Dependent Ecosystems

Issue: The Project may impact biological resources associated with groundwater dependent ecosystems (GDE).

Specific impacts: The construction of the groundwater treatment facility may alter current groundwater levels and alter habitat within and adjacent to the Project site, significantly impacting GDEs. The Project may cause local extirpation of wildlife from otherwise suitable habitat through pumping efforts.

Why impacts would occur: The Department of Water Resources (DWR) [Sustainable Groundwater Management Act Data Viewer](#) identifies GDEs in the Projects geographic boundary and within the Project's vicinity (DWR 2018). The GDEs identified (including those up and downstream of the Project), may be comprised of phreatophytic vegetation, which rely on water supply from the groundwater table. This vegetation is a critical contributor to habitat and foraging areas for a wide range of species and can be sensitive to depth to groundwater threshold impacts (Naumburg et al. 2005, Froend and Sommer 2010). This sensitivity to groundwater level thresholds means that localized pumping and recharge actions altering groundwater levels (such as those proposed in the Project) can impact phreatophyte vegetation health. Both decreasing (drying out) or increasing (drowning) groundwater elevation has the potential to stress phreatophytes depending on the plant species and the groundwater elevation and duration (e.g., short term wetness/dryness versus prolonged wetness/dryness).

According to the MND, groundwater extraction has occurred as recent as 2023; however, the DWR's Sustainable Groundwater Management Act [Groundwater Levels Dataset](#) indicate groundwater levels at the Project site have increased since 2023. At the SCWD – Sand Canyon well (Station ID 57829), depth to groundwater measured at 72.62 feet below ground surface on December 15, 2022, and then measured at 12.34 feet below ground surface on November 15, 2024. CDFW is concerned that the installation of a groundwater treatment facility and resuming groundwater pumping may negatively impact GDEs onsite and negatively impact surrounding GDE vegetation downstream.

Evidence impacts would be significant: CDFW has a vested interest in the sustainable management of groundwater, as many sensitive ecosystems and public trust resources are dependent on groundwater. According to the Department of Water Resources' (DWR) Natural Communities Commonly Associated with Groundwater - Vegetation Dataset, GDEs occur within and adjacent to the Project area (DWR 2023).

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Specifically, GDEs have been identified to occur within the Santa Clara River. Phreatophytic vegetation associated with GDEs play a critical ecological role by providing nesting and foraging habitat for a wide range of species. This vegetation can be affected by changes in groundwater conditions such as depth to groundwater (Naumburg et al. 2005, Froend and Sommer 2010).

Actions proposed under the Project could result in significant adverse impacts for phreatophytic vegetation due to their sensitivity to groundwater level thresholds. Fluctuations in groundwater elevation have the potential to stress phreatophytes depending on the plant species, the depth and duration of groundwater changes, and the timing relative to key growth periods (e.g., short-term wetness/dryness versus prolonged wetness/dryness). To adequately evaluate and mitigate these potential impacts, the environmental document should verify the presence and spatial extent of GDEs that could be affected by the Project. It should also identify and characterize the associated vegetation communities, including species compositions, structural diversity, and integrity. Furthermore, the MND should determine the rooting depths and optimal groundwater table elevations for dominant phreatophytic species and assess how potential Project-induced groundwater changes may interact with these ecological thresholds. Absent this analysis, the environmental document may fail to fully disclose and address the Project's potential to cause significant adverse effects on groundwater-dependent vegetation communities and the wildlife that rely on them.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends the Project proponent deploy representative groundwater monitoring wells or stations, within GDEs, to track changes in groundwater levels and vegetation responses overtime. Monitoring should be designed to capture seasonal and interannual variability and should be maintained throughout the duration of the Project and for a sufficient post-Project period. SCVWA should develop and implement adaptive management thresholds and triggers based on observed changes in vegetation health, with clearly defined actions to be taken if monitoring indicates stress or decline attributable to Project-related impacts on groundwater.

Recommendation #1: The MND should verify the presence and extent of GDEs within the Project impact area. It should identify and described the associated vegetation communities, including species compositions and structural characteristics. Additionally, the MND should disclose rooting depths and optimal groundwater table elevations for dominant phreatophytic species to inform the impact analysis and support the development of effective monitoring and mitigation measures.

COMMENT #2: Pumping Impacts on Streams

Issue: Well pumping activities may impact the Santa Clara River.

Specific impacts: The Project will result in the operation of shallow wells. The pumping operation of the shallow wells have the potential to create a measurable or visible

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change in the Santa Clara River and a potential reduction in the width of any Santa Clara River surface flows.

Why impacts would occur: According to Fish and Game Code, section 1600 et seq., substantial changes to the bed, bank, and channel of a stream require notification to CDFW prior to well operations.

Substantial pumping or diversion of Santa Clara River surface flows or interconnected surface waters have the potential to adversely affect public trust resources, such as wetland, riverine, southern riparian scrub, and aquatic habitat as well as the wildlife that depend upon such habitats. Species that depend on such habitats and may be adversely impacted by SCVWA's pumping operations include, but are not limited to, California legless lizard, coastal whiptail, coast horned lizard, western spadefoot (*Spea hammondi*), California glossy snake (*Arizona elegans occidentalis*), south coast garter snake (*Thamnophis sirtalis*), and coastal California gnatcatcher (*Polioptila californica californica*).

Evidence impacts would be significant: CDFW exercises its regulatory authority as provided by Fish and Game Code, section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code, section 1602 requires any person, State or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

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

The water pumping and diversion activities, as described in the MND, may result in significant impacts to streams and associated natural communities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #2: The Project Applicant shall notify CDFW for the operation of the wells pursuant to Fish and Game Code, section 1602 and may need to obtain an LSA Agreement from CDFW. The Project Applicant shall comply with the mitigation measures detailed in a LSA Agreement issued by CDFW. The Project Applicant shall also provide a pumping schedule or Adaptive Management Plan to minimize impacts to the Santa Clara River and associated natural communities. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2025a).

Recommendation #2: CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the SCVWA for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, a project's CEQA document

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should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

Recommendation #3: CDFW requests the SCVWA provide a hydrogeologic assessment report for the specific wells that will be in operation to confirm there is no hydraulic connection or stream interaction between the shallow wells and the Santa Clara River.

ADDITIONAL RECOMMENDATIONS

Recommendation #4 – Night Lighting: If night lighting is necessary during Project construction, CDFW recommends the SCVWA incorporate measures to minimize potential adverse effects of artificial night lighting on wildlife and nearby natural habitats. Light pollution can disrupt wildlife behavior, including foraging, migration, and reproduction, particularly for nocturnal and light-sensitive species. To reduce these impacts, SCVWA should implement measures such as lighting that emits longer wavelengths, specifically amber, orange or red hue with peak wavelengths above 560 nanometers, which are less disruptive to wildlife. Ideally, lighting should have correlated color temperature of 3,000 Kelvin or lower to reduce blue light emissions. Additionally, all exterior lighting should be directed downward and away from adjacent vacant land and habitat areas, the duration and extent of night lighting use should be the minimum needed for safety and operations, and lighting fixtures should be properly shielded to reduce light spill and glare (DRISI 2019).

Recommendation #5 – Nesting Birds: The MND proposes BIO-4 to avoid impacts to nesting birds; however, the measure, as proposed, may not reduce the Project impact on nesting birds to less than significant.

It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Effective mitigation is necessary to compensate for the long-term and temporal loss of ecological function, including permanent removal of nesting and foraging habitat. To ensure habitat losses are sufficiently offset, mitigation should be designed to replace or enhance habitat of equal or greater ecological value, based on acreage of impact, quality and composition of vegetation, and conservation status of the wildlife species affected. Project impacts to habitat occupied by California Species of Special Concern and CESA-listed species will require proportionally greater mitigation to ensure the replacement of lost habitat functions and values to support the continued viability of affected species. CDFW is

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available should the SCVWA desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the conservation status of the species.

Environmental Data: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., CNDDDB) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2025b). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2025c).

Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist the SCVWA in adequately analyzing and minimizing/mitigating impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Senior Environmental Scientist (Specialist), at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:

DF423498814B441...
Heather A. Pert
Environmental Program Manager

EC: CDFW
Baron Barrera – Senior Environmental Scientist (Supervisory)
Felicia Silva – Senior Environmental Scientist (Specialist)
Cindy Haley – Staff Services Analyst

OPR
State Clearinghouse - State.Clearinghouse@opr.ca.gov

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- [DRISI] California Department of Transportation, Division of Research, Innovation and System Information (DRISI). (2019, January 23). *Assessing the impacts of LED lighting to wildlife* (Preliminary Investigation PI-0046). Requested by Scott Quinnell, Caltrans District 8.
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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

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

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #1: Groundwater Dependent Ecosystems</p> <p>The Project proponent shall deploy representative groundwater monitoring wells or stations within GDEs to track changes in groundwater levels and vegetation responses overtime. Monitoring should be designed to capture seasonal and interannual variability and should be maintained throughout the duration of the Project and for a sufficient post-Project period. SCVWA should develop and implement adaptive management thresholds and triggers based on observed changes in vegetation health, with clearly defined actions to be taken if monitoring indicates stress or decline attributable to Project-related impacts on groundwater.</p>	<p>Prior to, During and After Project activities</p>	<p>Project Proponent</p>
<p>Recommendation #1: Groundwater Dependent Ecosystems</p> <p>The MND should verify the presence and extent of GDEs within the Project impact area. It should identify and describe the associated vegetation communities, species compositions and structural characteristics. Additionally, the MND should disclose rooting depths and optimal groundwater table elevations for dominant phreatophytic species to inform the impact analysis and support the development of effective monitoring and mitigation measures.</p>	<p>Prior to and After Project Activities</p>	<p>Project Proponent</p>
<p>Mitigation Measure #2: Streambed Alteration Agreement</p> <p>The Project Applicant shall notify CDFW pursuant to Fish and Game Code, section 1602 and may need to obtain an LSA Agreement from CDFW. The Project Applicant shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The</p>	<p>Prior to Project Activities</p>	<p>Project Proponent</p>

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<p>Project Applicant shall also provide a pumping schedule or adaptive management plan to minimize impacts to the Santa Clara River and associated natural communities.</p>		
<p>Recommendation #2: Streambed Alteration Agreement</p> <p>CDFW’s issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the Lead Agency/Project Applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, a project’s CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.</p>	<p>Prior to Project Activities</p>	<p>Project Proponent</p>
<p>Recommendation #3: Streambed Alteration Agreement</p> <p>CDFW requests the Agency provide a hydrogeologic assessment report for the specific wells that will be in operation to confirm there is no hydraulic connection or stream interaction between the shallow wells and the Santa Clara River.</p>	<p>Prior to Project Activities</p>	<p>Project Proponent</p>
<p>Recommendation #4 Night Lighting</p> <p>If night lighting is necessary during Project construction, SCVWA should incorporate measures to minimize potential adverse effects of artificial night lighting on wildlife and nearby natural habitats. Light pollution can disrupt wildlife behavior, including foraging, migration, and reproduction, particularly for nocturnal and light-sensitive species. To reduce these impacts, SCVWA should implement measures. such as using lighting that emits longer wavelengths, specifically amber, orange or red hue with peak wavelengths above 560 nanometers, which are less disruptive to</p>	<p>Prior to Project Activities</p>	<p>Project Proponent</p>

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<p>wildlife. Ideally, lighting should have correlated color temperature of 3,000 Kelvin or lower to reduce blue light emissions. Additionally, all exterior lighting should be directed downward and away from adjacent vacant land and habitat areas, the duration and extent of night lighting use should be the minimum needed for safety and operations, and lighting fixtures should be properly shielded to reduce light spill and glare.</p>		
<p>Recommendation #5 – Nesting Birds</p> <p>The MND proposes BIO-4 to avoid impacts to nesting birds; however, the measure, as proposed, may not reduce the Project impact on nesting birds to less than significant.</p> <p>It should be noted that the temporary halt of Project activities within buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Effective mitigation is necessary to compensate for the long-term and temporal loss of ecological function, including permanent removal of nesting and foraging habitat. To ensure habitat losses are sufficiently offset, mitigation should be designed to replace or enhance habitat of equal or greater ecological value, based on acreage of impact, quality and composition of vegetation, and conservation status of the wildlife species affected. Project impacts to habitat occupied by SSC and CESA-listed species will require proportionally greater mitigation to ensure the replacement of lost habitat functions and values to support the continued viability of affected species. CDFW is available should the SCVWA desire additional feedback regarding proper mitigation for impacts to occupied habitat depending on the conservation status of the species.</p>	<p>Prior to Project Activities</p>	<p>Project Proponent</p>