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January 20, 2026  
*Sent via email*

Mathew Evans, Project Planner  
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**Subject: Draft Environmental Impact Report, First Industrial Logistics at Harley Knox and Indian (Project), State Clearinghouse No. 2025051368, City of Perris**

Dear Mathew Evans:

The California Department of Fish and Wildlife (CDFW) received a Draft Environmental Impact Report from the City of Perris (City) for the First Industrial Logistics at Harley Knox and Indian Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

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, we appreciate 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, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (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 (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to

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<sup>1</sup> 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.

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 state fish and wildlife resources.

CDFW is also submitting comments 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, including 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 CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, *et seq.*, of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. CDFW is providing the following comments as they relate to the Project’s consistency with the MSHCP and CEQA.

## **PROJECT DESCRIPTION AND SUMMARY**

**Description:** The First Industrial Logistics at Harley Knox and Indian Project will involve the construction of an approximately 549,786-square-foot non-refrigerated warehouse building and associated infrastructure designed to possibly operate 24 hours a day, seven days a week. The Project would include a total of 94 dock doors on the north side of the building, and 14-foot-high screen walls, an 8-foot-high perimeter wrought iron fence along the perimeter of the proposed building, and landscaping along the Project site’s frontage. The Project would provide a total of 188 automobile parking stalls, which includes 147 standard stalls, 5 Americans with Disabilities Act-compliant (ADA) stalls, 1 ADA van stall, 35 standard electric vehicle stalls, 9 electric vehicle charging stations, 1 ADA electric vehicle charging station, 1 van electric vehicle charging station, and 1 ambulatory electric vehicle charging station. Automobile parking would be provided on the east and west side of the building near the office areas. The Project also includes 132 trailer parking stalls. The proposed Project also includes a 1.10-acre off-site improvement area for improvements in Harley Knox Boulevard and Indian Avenue, and

a drainage connection to the Riverside County Flood Control and Water Conservation District, Line B (also referred to as Perris Valley Storm Drain), located to the north of the Project site.

The main project site is 25.10 gross acres, and also includes approximately 1.1 acres of offsite improvements associated with potable water, sewer and storm drain connections in Harley Knox Boulevard and Indian Avenue, and sidewalk and parkway improvements along the Project's frontage.

**Location:** The Project site is located at northwest corner of Harley Knox Boulevard and Indian Avenue, within the City of Perris (City), Riverside County, California. The site is approximately 25.10 acres and consists of Assessor's Parcel Numbers (APNs) 302-020-013, 302-020-028, 302-020-038, 302-020-032, 302-020-040, 302-020-043, and 302-020-048. The Project site is located within Section 7, Township 4 South, Range 3 West, San Bernardino Base and Meridian, on the Perris, California USGS 7.5 Quadrangle Map (Perris Quadrangle) as shown on the USGS Topographic Map. The proposed Project also includes a 1.10-acre off-site improvement area for improvements in Harley Knox Boulevard and Indian Avenue, and a drainage connection to the Riverside County Flood Control and Water Conservation District, Line B, located to the north of the Project site. The Project site and off-site improvement area are located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan.

## **COMMENTS AND RECOMMENDATIONS**

Based on the documents for review, CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

### **Western Riverside County Multiple Species Habitat Conservation Plan**

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result

of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 2) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

### **Specific Comments**

#### **Comment #1: MSHCP Consistency**

The procedures described in the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section of the MSHCP Plan (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP Plan Area (including all areas of the Plan located outside the Criteria Area). Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service (USFWS) and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the Determination of Biologically Equivalent or Superior Preservation (DBESP) findings associated with the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11). As required by the MSHCP, its Implementation Agreement, and the City's associated take permits from USFWS and CDFW, completion of the DBESP process prior to adoption of the environmental document helps to ensure that the Project will be consistent with the MSHCP, and provides public disclosure and transparency during the CEQA process by identifying the Project

impacts and mitigation for wetland habitats and species, a requirement of CEQA Guidelines, §§ 15071, subds.(a)-(e).

The MSHCP identifies that assessment of these areas includes identification and mapping of riparian/riverine areas and vernal pools. Although the DEIR indicates that no riparian/riverine resources would be impacted, the project will involve the construction of an outfall structure with a concrete end wall and riprap within the Perris Valley Storm Drain for stormwater discharge. Modification of the Perris Valley Storm Drain would result in impacts to riparian/riverine resources that would require a DBESP. Therefore, the completion of a DBESP is required.

The assessment within a DBESP shall consider species composition, topography/hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife habitat, and aquatic habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP Conservation Area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the Lead Agency). Furthermore, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the DBESP process.

The City is required to ensure the Project completes the DBESP process prior to completion and adoption of the DEIR to demonstrate implementation of MSHCP requirements in the CEQA documentation. CDFW appreciates the analysis of impacts provided within the DEIR. However, the MSHCP implementation process is not complete, because a DBESP has not been prepared and submitted to the CDFW and the USFWS for review and response for us to determine if the mitigation proposed for the impacts to riparian/riverine resources is biologically equivalent or superior

preservation to an avoidance alternative. It is not appropriate for the City to adopt the DEIR until the DBESP is complete because the City is required to notify CDFW and USFWS in advance of approval of public and private projects for identified MSHCP activities, such as completion of the DBESP for the riparian/riverine policy (Section 6.11 of the MSHCP).

CDFW requests that the City of Perris complete the DBESP process and then update the DEIR with the riparian/riverine mitigation measures identified in the DBESP. This process would demonstrate the Project's consistency with and the City's implementation of the MSHCP.

## **Comment #2: Nesting Birds**

**Issue:** The Project may have a significant impact on nesting birds, including Species of Special Concern, that are subject to Fish and Game Code sections 3503, 3503.5, 3513, and the Migratory Bird Treaty Act of 1918.

**Specific impact:** Project implementation could result in the loss of nesting and/or foraging habitat for passerine and raptor species from the removal of vegetation onsite and the noise and light disturbance that could result from Project activities.

**Why impacts would occur:** Project activities could result in temporary or long-term loss of suitable nesting, foraging, and roosting habitats. Construction during the breeding season of nesting birds could potentially result in the incidental loss of breeding success or otherwise lead to nest abandonment. Noise from road use, generators, and heavy equipment may disrupt nesting bird mating calls or songs, which could impact reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009), and songbird abundance and density was significantly reduced in areas with high levels of noise (Bayne et al. 2008). Additionally, noise exceeding 70 dB(A) may affect feather and body growth of young birds (Kleist et al. 2018). In addition to construction activities, industrial development and increased human presence in the Project site could contribute to nesting bird impacts.

The timing of the nesting season varies greatly depending on several factors, such as the bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). CDFW staff have observed that changing climate conditions may result in the nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends the completion of nesting bird survey regardless of time of year to ensure compliance with all applicable laws

pertaining to nesting and to avoid take of nests.

The duration of a pair to build a nest and incubate eggs varies considerably, therefore, CDFW recommends surveying for nesting behavior and/or nests and construction within three days prior to start of Project construction to ensure all nests on site are identified and to avoid take of nests. Without appropriate species-specific avoidance measures, biological construction monitoring may be ineffective for detecting nesting birds. This may result in Take of nesting birds. Project ground-disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. In addition, the Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.

**Evidence impacts would be significant:** It is the Project proponent's responsibility to avoid Take of all nesting birds. Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.). Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. These regulations apply anytime nests or eggs exist on the Project site.

#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** To address the above issues and help the Project applicant avoid unlawful take of nesting birds, CDFW requests the City revise the following mitigation measures in the DEIR per below (edits are in ~~striketrough~~ and **bold**) and also included in Attachment 1 "Mitigation Monitoring and Reporting Program".

#### **MM BR 1: Preconstruction Surveys for Nesting Birds and Raptors.**

To avoid violation of the Migratory Bird Treaty Act and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, ~~to the greatest extent possible,~~ during the nesting season of potentially occurring native and migratory bird species.

If ~~site preparation activities are proposed during the nesting/breeding season~~ **this avoidance schedule is not feasible**, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey **no more than three days prior** to the issuance of grading permits for the Project **start of construction** to determine if active nests of species protected by the Migratory Bird Treaty Act or the California Fish and Game Code are present in the construction zone. **The results of the pre-construction survey shall be documented by the qualified biologist and shall be provided to the Applicant.**

The Project Applicant shall adhere to the following:

1. Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If ~~active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, then construction may be conducted during the nesting/breeding season.~~ However, If active nests are located during the pre-activity field survey, then the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. **The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. The buffer around the nest shall be delineated and flagged, and all work within these buffers shall**

**be halted until a qualified biologist determines the nesting effort is finished (i.e., the juveniles are surviving independent from the nest, or the nest has failed).**

The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

### **Comment #3: Burrowing Owl**

**Issue:** On October 10, 2024, the California Fish and Game Commission accepted a petition to list Western Burrowing Owl as endangered under the California Endangered Species Act (Fish & G. Code, § 2050 et seq.), determining the listing “may be warranted” and advancing the species to the candidacy stage of the CESA listing process. The Project may have a significant impact on burrowing owl (*Athene cunicularia hypugaea*) and burrowing owl habitat.

**Specific impacts:** Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Also, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and statewide declines of burrowing owl.

**Why impacts would occur:** The DEIR identifies that burrowing owl have the potential to occur within the Project site. To effectively assess potential impacts, focused breeding seasons surveys should be conducted, and where appropriate, mitigation required for the unavoidable impacts.

**Evidence impact would be significant:** The California Fish and Game Commission accepted a petition to list Burrowing Owl as endangered under CESA, determining the listing “may be warranted” and advancing the species to the candidacy stage of the

CESA listing process. Burrowing Owl is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9)

In California, burrowing owls are in decline primarily because of habitat loss, as well as disease, predation, and drought. Burrowing owls require specific soil and microhabitat conditions, occur in few locations within a broad habitat category of grassland and some forms of agricultural land, require a relatively large home range to support their life history requirements, occur in relatively low numbers, and are semi-colonial.

Additionally, the measures provided do not adequately implement the terms of MSHCP Section 6.3.2 as well as the burrowing species objectives outlined in Volume II Species Accounts. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species by CDFW.

#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** To avoid take of active burrowing owl burrows (nests) and comply with MSHCP Additional Survey Needs and Procedures for burrowing owl under Section 6.3.2, CDFW requests the City include the following mitigation measures in the DEIR per below (edits are in ~~strike through~~ and **bold**), and also included in Attachment 1“Mitigation Monitoring and Reporting Program”.

#### **MM BR 2: Pre-Construction and Focused Surveys for Burrowing Owl**

**Due to the presence of suitable habitat, four focused burrowing owl surveys shall be conducted on the Project area and within a 500-foot buffer during the burrowing owl breeding season (March 1 through August 31) in accordance with the Western Riverside MSHCP Burrowing Owl Survey Instructions (County of Riverside, 2006). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary.**

The Project proponent shall retain a qualified biologist to conduct a pre-construction **presence/absence** survey for resident burrowing owls ~~no more than~~ **within** 30 days prior to commencement of grading and construction activities at the Project site ~~site disturbance (including vegetation clearing and grubbing, tree removal, site~~

**watering, equipment staging, grading, etc.).** The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit.

In addition, if burrowing owls are observed during the Migratory Bird Treaty Act nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls.

The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP. If burrowing owl are detected, the California Department of Fish and Wildlife (CDFW) and Western Riverside County Regional Conservation Authority (RCA) shall be sent written notification by the City, within three days of detection of burrowing owls.

If active nests are identified during the pre-construction survey required by mitigation measure MM BR 1, the nests shall be avoided and the ~~qualified biologist and Project Applicant shall coordinate with the City of Perris Planning Division to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW, the U.S. Fish and Wildlife Service and the RCA prior to commencing Project activities.~~ **project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance.**

An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP **detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods.** The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring ~~as applicable~~ **actions.** The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation.

If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented **for the temporary or permanent loss of occupied burrow(s) and habitat. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take.**

The Permittee shall implement the Burrowing Owl Plan following CDFW, Fish and Wildlife Service, and RCA review and ~~concurrence~~ **approval and** prior to initiating ground disturbance within the project site. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW and RCA prior to the start of Project activities. When the Project biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW, the Fish and Wildlife Service, and the RCA within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

**If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.**

#### **Comment #4: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)**

**Issue:** Based on review of material submitted with the DEIR, the Project has the potential to impact fish and wildlife resources subject to Fish and Game Code section 1600 et seq.

**Specific Impact:** The DEIR indicates that an outfall structure will be constructed within the Perris Valley Storm Drain. This has the potential to impact fish and wildlife resources as a result of increased energy of flow and deposition of debris, waste or other materials.

**Why Impact Would Occur:** Project-related activities would likely alter drainage patterns and water quality within downstream and immediate upstream portions of the Project site, including: volume, velocity, and frequency of existing and post-Project flows; polluted runoff; habitat loss; increased flooding; soil erosion and/or sedimentation in downstream water bodies and resources.

**Evidence Impact Would Be Significant:** Based on the proposed activities, the Project may substantially adversely affect the pattern and the geomorphological processes of the streams that the channel feeds into through increased velocity and scour.

CDFW requests that the City fully identify the potential impacts to the riparian and riverine resources. Consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that “any river, stream or lake” includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

**MM-BIO XX: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)**

**Direct and indirect permanent impacts to any rivers, streams, or lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts to Fish and Game Code section 1602 resources and obtain one of the following: a CDFW-executed Streambed Alteration Agreement (SAA) authorizing impacts to Fish and Game Code section 1602 resources associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Streambed Alteration Agreement is not required.**

**The notification to CDFW should provide the following information:**

- 1. A stream delineation including the bed, bank and channel;**

2. **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**
3. **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**
4. **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

**If an SAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per an LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.**

#### **Comment #5: Crotch's Bumblebee**

**Issue:** The Project may impact Crotch's bumble bee (*Bombus crotchii*).

**Specific Impacts:** The Project may result in temporal or permanent loss of suitable nesting and foraging habitat. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

**Why impact would occur:** Crotch's bumble bee could be directly affected by damage to suitable habitat, including grassland and scrub habitats. Direct effects would also include the permanent conversion of occupied habitat to project infrastructure or changes to micro/local hydrology. Indirect effects on Crotch bumble bee during construction would include the accumulation of fugitive dust resulting in degradation of

habitat for these invertebrates. In addition, changes to local runoff would have negative effects on the health and vigor of plants that make up suitable habitat.

**Evidence impact would be significant:** The California Fish and Game Commission accepted a petition to list Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch's bumble bee is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch bumble bee has a State ranking of S1/S2. This means that the Crotch bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [Terrestrial and Vernal Pool Invertebrates of Conservation Policy](#) (CDFW 2017).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** To avoid take of Crotch's bumble bee, CDFW requests the City include the following mitigation measures in the DEIR per below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program.

**MM-BIO XX: Crotch's Bumblebee**

**Crotch's bumble bee is a CDFW candidate endangered species, and shall be surveyed for prior to construction. Prior to ground disturbance, a habitat assessment for Crotch's bumble bee will be conducted within the Project Site and an appropriate survey buffer by a qualified biologist with experience surveying for and observing Crotch's bumble bee. If the qualified biologist determines that suitable habitat is present, site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in consultation with CDFW. In addition, the Project Applicant shall adhere to the following:**

- **Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee**

**presence within seven (7) days prior to the scheduled disturbance.**

- **If Crotch's bumble bee is present, the qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, 15-meter no disturbance buffer zones should be established around nests to reduce the risk of disturbance or accidental take. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take.**
- **The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) with CDFW prior to grading. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b).**
- **Any floral resource associated with Crotch's bumble bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch's bumble bee nests have been identified and floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.**

## **ADDITIONAL RECOMMENDATIONS**

### **Mitigation and Monitoring Reporting Plan**

CDFW recommends updating the DEIR's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA

Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## **ENVIRONMENTAL DOCUMENT 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 for the First Industrial Logistics at Harley Knox and Indian Project (Project), State Clearinghouse No. 2025051368 to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that the City of Perris address CDFW's comments and concerns prior to adoption of the DEIR for the Project.

Mathew Evans  
City of Perris  
January 20, 2026  
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Questions regarding this letter or further coordination should be directed to Alta Vasquez, Scientific Aid, at [Alta.Vasquez@wildlife.ca.gov](mailto:Alta.Vasquez@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
84F92FFEEFD24C8...

Kim Freeburn  
Environmental Program Manager

ec: **California Department of Fish and Wildlife**  
Carly Beck, Senior Environmental Scientist Supervisor  
[Carly.Beck@wildlife.ca.gov](mailto:Carly.Beck@wildlife.ca.gov)

Office of Planning and Research, State Clearinghouse, Sacramento  
[state.clearinghouse@lci.ca.gov](mailto:state.clearinghouse@lci.ca.gov)

Harry Sandoval (Western Riverside County Regional Conservation Authority)  
Director of Reserve Management and Monitoring  
[hsandoval@rctc.org](mailto:hsandoval@rctc.org)

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Boulevard, Suite C-220  
Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**VALERIE TERMINI, Acting Director**



### Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

| Biological Resources (BIO)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                        |                          |
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| Mitigation Measure (MM)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Timing                                                                 | Responsible Party        |
| <p>MM BR 1: Preconstruction Surveys for Nesting Birds and Raptors.</p> <p>To avoid violation of the Migratory Bird Treaty Act and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided during the nesting season of potentially occurring native and migratory bird species.</p> <p>If this avoidance schedule is not feasible, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey no more than three days prior to the start of construction to determine if active nests of species protected by the Migratory Bird Treaty Act or the California Fish and Game Code are present in the construction zone. The results of the pre-construction survey shall be documented by the qualified biologist and shall be provided to the Applicant.</p> <p>The Project Applicant shall adhere to the following:</p> | <p>Prior to commencing ground- or vegetation disturbing activities</p> | <p>Project Proponent</p> |

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| <p>1. Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.</p> <p>2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.</p> <p>If active nests are located during the pre-activity field survey, then the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. The buffer around the nest shall be delineated and flagged, and all work within these buffers shall be halted until a qualified biologist determines</p> |  |  |
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| <p>the nesting effort is finished (i.e., the juveniles are surviving independent from the nest, or the nest has failed).</p> <p>The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.</p> |                                                                        |                          |
| <p><b>MM BR 2: Pre-Construction and Focused Surveys for Burrowing Owl</b></p> <p>Due to the presence of suitable habitat, four focused burrowing owl surveys shall be conducted on the Project area and within a 500-foot buffer during the burrowing owl breeding season (March 1 through August 31) in accordance with the Western Riverside MSHCP Burrowing Owl Survey Instructions (County of Riverside, 2006). If survey results are negative (i.e., no occupied burrows or live burrowing owls are detected) and ground-disturbing Project activities are scheduled to begin within 30 days of the final survey, then no additional preconstruction survey or biological monitoring requirements will be necessary.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Prior to commencing ground- or vegetation disturbing activities</p> | <p>Project Proponent</p> |

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| <p>The Project proponent shall retain a qualified biologist to conduct a pre-construction presence/absence survey for resident burrowing owls within 30 days prior to site disturbance (including vegetation clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.). The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit.</p> <p>In addition, if burrowing owls are observed during the Migratory Bird Treaty Act nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls.</p> <p>The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP. If burrowing owl are detected, the California Department of Fish and Wildlife (CDFW) and Western Riverside County Regional Conservation Authority (RCA) shall be sent written notification by the City, within three days of detection of burrowing owls.</p> <p>If active nests are identified during the pre-construction survey required by mitigation measure MM BR 1, the nests shall be avoided and the project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance.</p> |  |  |
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An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation.

If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented for the temporary or permanent loss of occupied burrow(s) and habitat. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take.

The Permittee shall implement the Burrowing Owl Plan following CDFW, Fish and Wildlife Service, and RCA review and approval and prior to initiating ground disturbance within the project site. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW and RCA prior to the start of Project activities. When the Project biologist determines that burrowing owls are no longer

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| <p>occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.</p> <p>If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW, the Fish and Wildlife Service, and the RCA within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.</p> <p>If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.</p>                                                                                                                |                                                                        |                          |
| <p><b>MM-BIO XX: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)</b></p> <p>Direct and indirect permanent impacts to any rivers, streams, or lakes shall be addressed through Section 1602 of the California Fish and Game Code. Prior to the grading of the Project site and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts to Fish and Game Code section 1602 resources and obtain one of the following: a CDFW-executed Streambed Alteration Agreement (SAA) authorizing impacts to Fish and Game Code section 1602 resources associated with the Project, written documentation from CDFW that notification is not required, or written documentation that a Streambed Alteration Agreement is not required.</p> <p>The notification to CDFW should provide the following information:</p> | <p>Prior to commencing ground- or vegetation disturbing activities</p> | <p>Project Proponent</p> |

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| <ol style="list-style-type: none"><li>1. A stream delineation including the bed, bank and channel;</li><li>2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);</li><li>3. A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and</li><li>4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.</li></ol> <p>If an SAA is required, the Applicant shall provide compensatory mitigation at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per an LSA Agreement. Mitigation should occur within the Western Riverside County. Onsite mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities, which may include non-native species removal and revegetation followed by periodic</p> |  |  |
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| monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                 |                   |
| <p><b>MM-BIO XX: Crotch's Bumblebee</b></p> <p>Crotch's bumble bee is a CDFW candidate endangered species, and shall be surveyed for prior to construction. Prior to ground disturbance, a habitat assessment for Crotch's bumble bee will be conducted within the Project Site and an appropriate survey buffer by a qualified biologist with experience surveying for and observing Crotch's bumble bee. If the qualified biologist determines that suitable habitat is present, site specific surveys for Crotch's bumble bee shall be conducted in accordance with any Crotch's bumble bee survey protocol provided by CDFW. If Crotch's bumble bee are determined to be present within the impact site and it is determined the species will be impacted by Project implementation, appropriate mitigation will be determined in consultation with CDFW. In addition, the Project Applicant shall adhere to the following:</p> <ul style="list-style-type: none"><li>• Inactive small mammal burrows and thatched/bunch grasses should be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it should be resurveyed for Crotch's bumble bee presence within seven (7) days prior to the scheduled disturbance.</li><li>• If Crotch's bumble bee is present, the qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, 15-meter no disturbance buffer zones should be established</li></ul> | Prior to commencing ground- or vegetation disturbing activities | Project Proponent |

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| <p>around nests to reduce the risk of disturbance or accidental take. If Project activities may result in disturbance or potential take, the qualified biologist, in coordination with CDFW, should expand the buffer zone as necessary to prevent disturbance or take.</p> <ul style="list-style-type: none"><li>• The Project does not have the authority to take a candidate species and shall obtain an Incidental Take Permit (ITP) with CDFW prior to grading. If “take” or adverse impacts to Crotch’s bumble bee cannot be avoided either during Project activities or over the life of the Project, the Project proponent should obtain appropriate take authorization from CDFW pursuant to Fish and Game Code section 2081 subdivision (b).</li><li>• Any floral resource associated with Crotch’s bumble bee that will be removed or damaged by the Project should be replaced at no less than 1:1. Floral resources should be replaced as close to their original location as is feasible. If active Crotch’s bumble bee nests have been identified and floral resources cannot be replaced within 200 meters of their original location, floral resources should be planted in the most centrally available location relative to identified nests. This location should be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources should be maintained in perpetuity and should be replanted and managed as needed to ensure the habitat is preserved.</li></ul> |  |  |
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