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DEPARTMENT OF FISH AND WILDLIFE

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August 21, 2026

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Subject: Draft Environmental Impact Report for the Belcaro at Sand Canyon Project, SCH No. 2025061338, Los Angeles County, CA

Dear Andy Olson:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the City of Santa Clarita (City) for the Belcaro at Sand Canyon (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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

CDFW ROLE

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

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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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) 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: NUWI-Sand Canyon, LLC

Objective: The objective of the Project is to create 341 detached single-family senior housing lots, 1 recreational lot containing a recreation center, 23 private street lots, and 55 open space lots. Primary Project activities include grading, creation of multiple streets, creation of approximately 0.9 miles of trails, and the improvement of the existing Lost Canyon Road as well as the intersection of Lost Canyon Road and Sand Canyon Road.

Location: The Project site consists of approximately 208 acres of undeveloped land in the City of Santa Clarita, Los Angeles County. 193.8 acres are attributed to the single-family residential lots (58.7ac), recreation area and clubhouse (3.1ac), private street lots and emergency vehicle access (25.4ac), and open space (106.6ac). The remaining 14.2 acres consist of the improvement and extension of Lost Canyon Road to connect the development with a proposed railroad crossing, extension of a newly constructed "J" Street to the south to connect with Robinson Ranch Road, and the construction of approximately 2.6 miles of public trails.

Timeline: The Project is expected to be built over a five-year period.

Biological Setting: The Project is bordered by the Santa Clara River to the north. Residential development occurs to the west and the south of the Project site. The Robinson Ranch Golf course also borders the Project site to the south. Undeveloped land is to the east of the Project site. Union Pacific Railroad tracks run east to west and bisect the Project site. In addition, Oak Spring Canyon Creek and the Santa Clara River flow through the Project site. Aerial imagery and the California Natural Diversity Database shows vegetation communities of southern riparian scrub and other herbaceous vegetation. Species that have the potential to occur and may be impacted by the Project include, but are not limited to:

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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Amphibians

- western spadefoot (*Spea hammondi*, ESA Proposed Threatened, California Endangered Species Act (CESA) Candidate, California Species of Special Concern (SSC))

Birds

- Bell's sparrow (*Artemisiospiza belli belli*; California Watch List (WL))
- coastal California gnatcatcher (*Polioptila californica californica*; Endangered Species Act (ESA) Threatened, SSC)
- southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*, WL)

Fish

- Santa Ana sucker (*Catostomus santaanae*, ESA Threatened, SSC)
- unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*; ESA Endangered, CESA Fully Protected)

Invertebrates

- Crotch's bumble bee (*Bombus crotchii*; CESA Candidate)

Mammals

- mountain lion (*Puma concolor*; CESA Candidate Species)

Plants

- Coulter's saltbush (*Atriplex coulteri*; California Rare Plant Rank (CRPR) 1B.2, SSC)
- slender mariposa lily (*Calochortus clavatus* var. *gracilis*; CRPR 1B.2)
- slender-horned spineflower (*Dodecahema leptoceras*; ESA Endangered, CESA Endangered, CRPR 1B.1)

Reptiles

- California glossy snake (*Arizona elegans occidentalis*; California legless lizard (*Anniella* spp.; SSC)
- coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC)
- south coast garter snake (*Thamnophis sirtalis*; SSC)
- two-striped gartersnake (*Thamnophis hammondi*, SSC)

COMMENTS AND RECOMMENDATIONS

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

COMMENTS AND RECOMMENDATIONS

COMMENT #1: Impacts to Wildlife Connectivity and the Santa Clara River Significant Ecological Area

Issue: CDFW is concerned the Project constitutes an impact to a known wildlife movement corridor, the Santa Clara River.

Specific impact: The Project as proposed may impact wildlife populations by increasing human presence, traffic, noise, air pollutants and dust, artificial lighting, and will significantly and permanently reduce the width of the existing wildlife corridor.

Why impact would occur: The Project site is located almost entirely within the Santa Clara River Significant Ecological Area (SEA). The Santa Clara River SEA explicitly includes watershed, upland, riparian, tributary areas in addition to the Santa Clara River itself. It is noted to encompass the "single most direct wildlife movement corridor and habitat linkage zone for wildlife movement between the Mojave Desert and higher elevation of the San Gabriel Mountains, the southern Sierran interchange zone, the Santa Susana Mountains, coast ranges, and Oxnard coastal plain." Tributaries to the Santa Clara River, such as Oak Spring Canyon Creek, provide additional wildlife connectivity opportunities throughout the greater landscape.

The Project site would impact the functional capacity of the SEA both east-west along the Santa Clara River, and north-south along and eastwards of Oak Spring Canyon Creek by developing the majority of this southern portion of open space area. This would impact special-status species, such as western spadefoot toad, California gnatcatcher, Crotch's bumblebee, and mountain lion, as well as small- (raccoon, striped skunk) and medium- (coyote and bobcat) sized mammal species that use the area to hunt, seek shelter, breed, and conduct other normal behaviors important for their survival, especially within the wilderness-urban interface.

The DEIR concludes that the Project design with two on-site conservation areas (one riparian, one upland) and the replacement of an Arizona crossing with a bridge over Oak Spring Canyon Creek is sufficient to reduce potential impacts to wildlife corridors to less than significant (Figure 1). CDFW is concerned that these two disconnected on-site conservation areas and an improved river crossing are not adequate to replace the proposed loss of both east-west and north-south wildlife movement and ensure the continued, unimpacted use of this corridor by the species that occur or likely occur on or adjacent to the Project site. Though DEIR also states that the Study Area does not occur within CDFW's Essential Habitat Connectivity Project Map, it has been within this mapped area since at least 2014 (Figure 2). Therefore, the proposed Project would disconnect a known wildlife corridor in an area that is ecologically significant largely in part due to its wildlife connectivity.

CDFW is also concerned that increased traffic on local and surrounding roads, as noted in the DEIR, may further impact wildlife connectivity. The Federal Highway Administration Research and Technology Report (FHWA-HRT-08-034) states wildlife vehicle collisions are most prevalent in the early morning (5-9am) and in the evening (4-12pm), which is when traffic volume would be increased by the Project. Though the DEIR mentions developments, adjacent golf courses, roads, and train tracks adjacent to the property as potential deterrence to some wildlife movement, partial deterrence does not equate to the site being already disconnected; the site still serves as a corridor for wildlife movement, a feature that would be removed by the proposed development. Additionally, adjacent golf courses may actually provide additional habitat for species like western spadefoot toad whose movement through the landscape would be impacted by the Project design, rather than negate the DEIR's need for further analysis.

The cumulative impacts from previous Projects have developed the immediate area, leaving the Project site as the only north/south access to the Santa Clara River as well as the only undeveloped southern portion of the Santa Clara River in its locality. This means the Project site serves as the main corridor for wildlife movement to and from the Santa Clara River in the area. CDFW is concerned that the current design of two disconnected conservation areas and installation of a bridge crossing is not adequate to ensure continued use of this corridor by wildlife. CDFW is concerned removing this corridor while increasing local road traffic will result in increased death to local species, including special-status species like mountain lion.

Other factors of the development may indirectly affect local wildlife as well. Increased numbers of dogs, cats, and other pets can act as subsidized predators, killing millions of wild animals each year (Courchamp and Sugihara, 1999) (May and Norton, 1996). Artificial night lighting and night work, which can impair the ability of nocturnal animals to navigate through a corridor (Beier, 2006), has also been implicated in decline of reptile populations (Perry and Fisher, 2006). The Project's resulting growth in human activity and presence may further push local mountain lion to increasingly nocturnal activity, strengthening the need to avoid night work and lighting (Bolas et al., 2025).

Evidence impact would be significant: Take of special-status species and their habitat is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW. CEQA Guidelines section 15130 also require a discussion of cumulative impacts.

Recommended Potentially Feasible Mitigation Measure(s):

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

Recommendation #1: CDFW recommends the Project select Alternative 2 or ensure the Project is redesigned to capture the benefits of wildlife connectivity that are critical in this area. The Project's redesign should analyze and disclose its impacts to wildlife connectivity, including, but not limited to, habitat loss and fragmentation, narrowing of wildlife corridors, and introduction of barriers to wildlife movement.

Mitigation Measure #1: The Project's on-site mitigation design shall create a wildlife corridor that maintains east-west and north-south wildlife corridors to, from, and along the Santa Clara River. The corridor shall include a buffer around Oak Springs Canyon Creek to allow for wildlife movement along this tributary. The corridor shall also be of a scientifically defensible wildlife corridor width to maintain wildlife movement in the area. Continued monitoring of any Project wildlife corridor shall be a condition of approval to ensure any approved design continues to provide adequate wildlife movement.

COMMENT # 2: Human-Wildlife Conflict

Issue: The Project will increase human-wildlife conflicts.

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

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

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

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

Evidence impact may be significant: The Project has the potential to significantly increase human-wildlife conflicts, resulting in adverse impacts to biological resources. Increased

development and human activity may lead to higher wildlife mortality from vehicle collisions, unauthorized take, or wildlife removal actions undertaken in response to conflicts. As conflicts become more frequent, wildlife may be subject to repeated capture, relocation, or, in some cases, euthanasia, which can adversely affect local wildlife populations and the ecological functions they support. These impacts may be compounded by other existing and planned developments in the surrounding area, creating cumulative effects through continued habitat fragmentation and increased human presence.

Recommended Potentially Feasible Mitigation Measure(s)

The Project may necessitate ongoing wildlife management measures, such as fencing, exclusion devices, trapping, relocation, or habitat modification, each of which has the potential to result in additional environmental impacts. Accordingly, these reasonably foreseeable effects should be fully analyzed, and the Project should include enforceable, long-term mitigation measures supported by a dedicated funding mechanism to ensure that future human-wildlife conflicts are effectively managed throughout the life of the Project.

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

Mitigation Measure #2: The Project shall not include any artificial nighttime lighting or night work

Mitigation Measure #3: Human use of any wildlife movement corridor shall be restricted away from structures/paths intended for wildlife movement.

Mitigation Measure #4: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat.

At a minimum, the WCMP shall include:

- Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal deterrence, and protection of wildlife and public safety.
- Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution.
- Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife.
- Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate,

reducing unnecessary water pooling, covering holes and trenches outside of Project activities, public education, and maintenance requirements.

- Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary.
- Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.

Mitigation Measure #5: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, trail cameras, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address Project-related human-wildlife conflicts, without reliance on public agency funding.

Mitigation Measure #6: Permittee is prohibited from undertaking or authorizing activities that result in take of any endangered, threatened, or candidate species, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14 §786.9.). If bobcat or mountain lion are observed (e.g., individuals observed, sign observed, or otherwise documented) within or adjacent to the Project areas during the course of Project activities, Permittee shall immediately provide written communication to CDFW of the observation and immediately report the sighting through CDFW's Wildlife Incident Reporting System³. Project activities shall cease based on the discretion of a Designated Biologist in coordination with CDFW if said Project activities have the potential to result in take of bobcat or mountain lion.

COMMENT #3: Clustered Development, Edge Effect, and Value of Proposed Conservation and Restoration Areas

Issue: CDFW is concerned with the scope of Project impacts and their relationship to the proposed mitigation

Specific impact: CDFW is concerned the biological value of the proposed conservation area is relatively low and does not mitigate for the impacts to resources on site.

Why impact would occur: CDFW is concerned that the Project does not avoid impacts to biological resources as the DEIR Alternative 2: Reduced Development Alternative, Avoidance of Sensitive Habitats does. The DEIR Alternative 2 "would reduce sensitive habitat impacts by approximately 31 acres and shrink the developable area by about 52%" while maintaining the Project's unit count.

³ <https://apps.wildlife.ca.gov/wir>

As noted above, the DEIR's on-site conservation areas consist of two conservation areas totaling 50.78 acres, with an additional minimum of 9.8 acres of offsite conservation proposed out of the 208 acres of impact (Figure 1). This is a ratio of less than 0.33:1 conserved to impacted acreage. Within the proposed conservation areas, the DEIR either defers restoration details to a later Habitat Mitigation and Monitoring Plan or describes "passive restoration" for temporarily disturbed habitats. The proposed conservation open space areas have public and private trails proposed for construction and usage.

Impacts and edge effects of the Project may be further exasperated by the Project's eventual fuel modification activities. In the DEIR, fuel modification zones are also included within the Project's proposed conservation areas. The DEIR does not sufficiently detail the impact of these fuel modification areas on the proposed conservation areas nor discuss alternative impacts if the proposed six foot wall is deemed insufficient, especially with adjacent irrigated vegetation.

Smaller patch sizes of open land incur greater edge effects. These include Argentine ant invasions known to occur when irrigation is introduced, as well as competition from non-native species, heat island effect, shading, noise, lighting, human disturbance, fuel modification, and not having sufficient area to properly establish territories and/or carry out all parts of a lifecycle. As noted above, the orientation of and disconnection between the proposed conservation sites would also negatively impact their biological value. The DEIR does not include adequate discussion of Project impacts via habitat fragmentation on the site's biological resources, including special-status species.

Additionally, studies have demonstrated that habitat patches without roads that are inaccessible to humans serve to better conserve many target species than do areas with roads and accessible habitat patches (Eigenbrod et al., 2008). Studies also show that habitat remnants from 24-247 acres do not retain their complement of native vertebrate species for longer than a few decades, leading to collapse of the ecosystem (Soulé et al., 1992).

Evidence impact would be significant: Appendix G of the CEQA Guidelines requires an examination of substantial adverse effects on biological resources, including "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." CEQA requires that significant environmental impacts must be mitigated to avoid or reduce any impacts. CEQA Section 15370 defines mitigation as: (a) Avoiding the impact altogether by not taking a certain action; (b) Minimizing impacts by limiting the degree or magnitude of the action; (c) Rectifying the impact by repairing, rehabilitating or restoring the impacted environment; (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the Project; and/or (e) Compensating for the impact by replacing or providing substitute resources or environments.

Recommended Potentially Feasible Mitigation Measure(s):

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

Recommendation #2: CDFW recommends clustering development, reducing the footprint of the development, and/or eliminating trails and development to reduce the disturbance acreage. CDFW also recommends combining any open space into fewer, larger areas that will be less affected by edge effect, thereby increasing their biological value.

Mitigation Measure #7: The final EIR shall clearly define areas that will be subject to fuel modification and remove this acreage from the conservation area calculations. The EIR should apply the same detail and exclusion for any trail areas, including a scientifically-defensible buffer zone around trails, as they have noted negative consequences for wildlife (Dertien et al., 2021). CDFW considers areas subject to fuel modification (e.g., thinning, trimming, irrigating) impacts to the ecosystem needing to be mitigated.

COMMENT #3: Updated Baseline Conditions

Issue: The DEIR analyzes impacts to biological resources using an environmental baseline that does not accurately reflect existing site conditions.

Specific impact: The DEIR's environmental baseline does not reflect current habitation utilization of the Project site. As such, the impact analysis calculations may not accurately capture the impacts of the Project.

Why impact would occur: CDFW disagrees with the DEIR's Appendix C "Biological Resources Technical Report" conclusion that western spadefoot have a "low probability to occur" and California gnatcatcher are "not expected to occur." Records for these special-status species indicate that both may occur on site with higher probabilities than is acknowledged in the DEIR (Figure 3). Additionally, though the surveys described in the DEIR's Appendix C did not detect California gnatcatcher, this constitutes just a single survey point that was a full year prior to the NOP's circulation and now over two years prior to this DEIR's circulation. It is especially concerning given California gnatcatcher, like western spadefoot, has documented occurrences nearby the site (Figure 4).

Therefore, Project activities have the potential to impact these species through direct take in the form of pursuit, capture, catch, or kill as well as indirect take through habitat destruction and loss of foraging, nesting, roosting, and/or refugia habitat. Direct impacts could also result from Project construction and activities (e.g., equipment staging, mobilization, and grading); ground disturbance; vegetation clearing; and trampling or crushing from construction equipment, vehicles, and foot traffic. Project activities may result in additional indirect impacts due to increased noise disturbances, dust, and vibrations caused by heavy equipment.

Evidence impact may be significant: Under CEQA, the DEIR analysis should compare the potential impacts against the existing conditions at the time of the NOP circulation (CEQA Guidelines § 15125). The NOP for the Project was circulated in June 2025, and at that time, there were records of these species occurring on site. Additionally, a single season of surveys that takes place years prior to the beginning of Project activities is not consistent with United States Fish and Wildlife Service (USFWS) California gnatcatcher survey protocols. Resultingly, the existing baseline conditions the DEIR uses, and the conclusions it makes based on these

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conditions, should be reflective of this.

Recommended Potentially Feasible Mitigation Measure(s)

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

Recommendation #3: The final EIR's environmental baseline and analysis shall be updated to reflect potential occurrence for listed species, including California gnatcatcher and western spadefoot. This update should include a revised impact calculation that considers the impacts on these species.

Mitigation Measure #8: As western spadefoot is recently a CESA candidate species, it receives full protection under CESA. Therefore, any take of western spadefoot by the Project would require an Incidental Take Permit. Because an Incidental Take Permit requires an associated CEQA document with adequate analysis of Project impacts to the focal species to be issued, it is in the Project's best interest that the final EIR includes a thorough analysis of potential impacts to western spadefoot, including a habitat assessment of not just the Project Area but also the surrounding area and potentially species-specific surveys, as determined after discussions with CDFW. Additionally, the City shall incorporate mitigation measures in the EIR that avoid, minimize, and mitigate potential impacts to western spadefoot and the Project shall consult with CDFW if impacts to western spadefoot cannot be avoided.

Mitigation Measure #9: The final EIR shall require additional surveying for California gnatcatcher prior to Project activities. Surveys should adhere to appropriate survey protocols as described in the USFWS [Coastal California Gnatcatcher \(*Poliophtila californica californica*\) Presence/Absence Survey Protocol](#) (USFWS 2019). The EIR should also discuss the Project's potential impacts to California gnatcatcher and any supporting habitat. CDFW recommends the City incorporate mitigation measures in the EIR that avoid, minimize, and mitigate potential impacts to California gnatcatcher.

COMMENT #4: Special-status Plant Species

Issue: The DEIR states slender mariposa lily and Pierson's morning glory plants will be impacted by the Project. Slender-horned spineflower has also been detected within 2 miles of the Project site.

Specific impact: The removal of individuals of special-status species will contribute to their local and overall decline.

Why impact would occur: The DEIR discloses the total number of individuals present per species records but does not specify how many will be impacted by the Project. The DEIR concluded impacts to these species, with no species-specific mitigation measures proposed, would not be significant. Many California rare plants are significant locally and have a history of unmitigated losses within Los Angeles County. The DEIR does not contain sufficient analysis to support this conclusion for the following rare plants.

Slender mariposa lily is ranked 1B.2 (fairly threatened in California) by the California Native Plant Society (CNPS). Pierson's morning glory is ranked 4.2 (moderately threatened in California, limited distribution) by CNPS. As noted in the DEIR, there are only 26 CNDBB occurrences of the plant. Slender-horned spineflower is ranked 1B.1 and is listed as both federally- and state-endangered.

The DEIR analysis does not acknowledge the limited number of occurrences of these plant species in Los Angeles County. According to the California Natural Diversity Database (CNDDDB), there are only 143 locational occurrences of slender mariposa lily, largely in Los Angeles County. More than half (56 percent) of the 86 occurrences identified since 2010, are threatened by development. Without Projects adopting adequate minimization and mitigation measures, this will result in the substantial losses to slender mariposa lilies throughout Los Angeles County. Slender mariposa lily, Pierson's morning glory, and slender-horned spineflower are all threatened by development throughout Los Angeles County. Loss of these species at the Project Site would only continue this pattern of loss without sufficient minimization and mitigation measures by the Project. As a result, CDFW asserts these impacts should be considered significant without mitigation.

Evidence impact would be significant: Impacts to special-status species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines § 15125 (c) and/or § 15380 (CEQA-rare). Information on the Project's specific impact within the context of the plant's regional patterns is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity); it is also required per CEQA Guidelines § 15125 (c) and/or § 15380.

Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA-rare or CESA-listed plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

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

Recommendation #4: When analyzing the current range and extent of CNPS rank 1 and 4 plants, current status and trends for each species shall be assessed in context to the local distribution and recent population status (last 20 years per the Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis recommendations) to sufficiently identify impacts and mitigation measures.

Recommendation #5: CDFW recommends that special-status plants be evaluated for impact significance during preparation of environmental documents relating to CEQA. To assist

botanists in evaluating California Rare Plant species for CEQA consideration, the California Native Plant Society (CNPS) has prepared a technical memorandum titled Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis⁴.

Additionally, this Project contains rare vegetation alliances and The Considerations for Including California Rare Plant Rank 4 Plant Taxa in CEQA Biological Resource Impact Analysis indicates List 4 plants that are associated with rare vegetation alliances should be fully evaluated in CEQA.

Recommendation #6: Any mitigation for CEQA-rare plant impacts shall include specific, measurable criteria for success. Monitoring for CEQA-rare vegetation communities should occur for a sufficient time period outside of the installation period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in CEQA-rare plant individuals (counted separately as flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.

Mitigation Measure #10: Given development pressures, habitat loss throughout the County, and the prevalence of surrounding developments, a Documented Conservation Seed Collection of the impacted rare plant species shall be made and deposited at either Santa Barbara Botanic Garden, the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden), or a similar institution. A Documented Conservation Seed Collection is when seed from CNPS ranked 1-4 plants, CEQA-rare, and/or CESA-listed plant species is collected and stored as part of a permanent genetic collection in a protected location. This collection preserves the genome, and any unique alleles that are present in any given occurrence, for future study and reintroduction Projects.

Funding should be provided to maintain the collection, as well as conduct periodic germination and viability tests, in perpetuity. Documented conservation collections (long-term storage) are important for conserving rare, gene pool representative germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.

Mitigation Measure #11: The Project shall conduct pre-construction vegetation surveys during the appropriate blooming season for each species following CDFW's Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensitive Natural Communities⁵ to detect any special-status species immediately prior to ground disturbing activities.

Mitigation Measure #12: The Project shall avoid take of rare plants. If avoidance to special-status plants is not possible, the Project shall conserve both the acreage and number of plants impacted by the Project in a conservation easement at a ratio of, at minimum, 3:1 for both the acreage and number of plants. The specific habitat that supports rare plants, and the current density per acre of these plants, should be assessed when formulating mitigation strategies. The Project shall not consider transplantation to adequately mitigation rare plant species under

⁴ https://www.cnps.org/wp-content/uploads/2020/02/crpr4_technical_memo.pdf

⁵ [Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensi...](#)

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CEQA.

Mitigation Measure #13: If the Project's proposed take includes slender-horned spineflower, the Project applicant shall contact CDFW to discuss an incidental take permit before proceeding.

Mitigation Measure #14: A weed management plan shall be developed for the Project area and implemented during the duration of this Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds shall be prevented from becoming established. The Project area shall be monitored via mapping for new introductions and expansions of non-native weeds.

COMMENT #5: Mitigation for Sensitive Vegetation Communities

Issue: CDFW is concerned that the proposed mitigation for sensitive vegetation communities is not adequate.

Specific Impact: Due to the rare nature of these vegetation communities, and the land which supports them, CDFW is concerned about a mitigation ratio that is not only not compensatory, but below replacement (0.6:1).

Why Impact Would Occur: Project implementation includes grading, vegetation clearing, trail/road construction, soil compaction, utilities construction, road maintenance, fuel modification, irrigation, and other activities that may result in direct mortality, population declines, or local extirpation of vegetation communities. The DEIR Table 4.4-9 shows approximately 39.62 acres of CDFW/County/City sensitive vegetation community habitats would be permanently or temporarily impacted due to Project activities. The DEIR states the mitigation includes a combined 24.39 acres of sensitive vegetation communities across the two conservation areas. This is a mitigation ratio of approximately 0.6:1. This is resulting in a net loss to these communities, and therefore far less than CEQA's standard of mitigation that is not just meant to replace but also to compensate for Project impacts.

Evidence Impact would be significant: CEQA Guidelines sections 15070 and 15071 require the DEIR to analyze if the Project may have a significant effect on the environment as well as review if the Project will "avoid the effect or mitigate to a point where clearly no significant effects would occur." Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA-rare vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #15: Any sensitive natural communities found on the Project shall be avoided. If avoidance is not feasible, the Project proponent shall mitigate at a ratio sufficient to

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achieve a no-net loss for impacts to special-status plant species and their associated habitat. CDFW recommends all impacts to the S3 sensitive vegetation communities (such as California sagebrush–purple sage scrub Alliance, California brittle bush–ashy buckwheat scrub Alliance, Basket bush–river hawthorn desert olive patches Alliance, Scale Broom Scrub Alliance, and Fremont cottonwood forest and woodland Alliance) be mitigated at a 4:1 ratio and impacts to the S4 and S5 communities be mitigated at a 2:1 ratio due to the overall decline of coastal bluff/scrub habitats region wide.

Mitigation Measure #16: The Conservation Management Plan and Habitat Mitigation and Monitoring Plan shall include restoration and monitoring methods; annual success criteria as compared to a reference site and separated by vegetative layers; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. Areas proposed as mitigation shall have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

ADDITIONAL COMMENTS

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

Lake and Streambed Alteration Notification. CDFW acknowledges Table 4.4-7 of the DEIR indicates portions of the Project area, totaling 46.96 total acres, may be considered streambed resources subject to CDFW wetland permitting. CDFW looks forward to receiving the Project's Lake and Streambed Alteration Notification pursuant to Fish & G. Code, § 1600 et seq.).

Listed Fish Species. A Lake and Streambed Alteration Notification would not constitute take coverage for listed fish species, such as unarmored three-spined stickleback and Santa Ana sucker. CDFW continues to recommend the Project proponent completely avoid impacts to these species during the Project's construction, operational, future maintenance, and other ongoing activities. Impacts to unarmored three-spine stickleback cannot be authorized; however, If impacts to unarmored three-spine stickleback, the Project proponent may consult with CDFW to discuss potential avoidance measures if needed.

Crotch's Bumble Bee Incidental Take Permit. CDFW acknowledges MM-BIO-1.1 discloses the Project proponent will submit survey results to CDFW and potentially consult with CDFW to obtain an ITP for Crotch's bumble bee. CDFW looks forward to receiving the Project's ITP application pursuant to Fish & G. Code § 2080.

Landscaping. For individual Projects that will incorporate landscaping, CDFW recommends that the Project applicant should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant,

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seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species listed by the California Invasive Plant Council⁶. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife resources, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (California Code of Regulations, tit. 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089).

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 website⁷ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special-status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form⁸. The City of Santa Clarita should ensure data collected for the preparation of the DEIR is properly submitted.

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines § 15073(e)).

Questions regarding this letter or further coordination should be directed to Christina Lupoli, Senior Environmental Scientist⁹.

⁶ <https://www.cal-ipc.org/plants/inventory/>

⁷ <https://wildlife.ca.gov/Data/CNDDDB>

⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

⁹ Christina.Lupoli@wildlife.ca.gov

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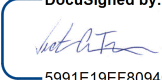
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Sincerely,

DocuSigned by:



5991E19EF8094C3...

Victoria Tang

Environmental Program Manager

South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

cc: California Department of Fish and Wildlife
Steve Gibson, Senior Environmental Scientist (Supervisory)
Andrew Aitken, Environmental Scientist
Lyle Enriquez, Environmental Scientist
Laurel Peelle, Environmental Scientist
Cindy Hailey, Staff Services Analyst
Erika Cleugh, Senior Environmental Scientist (Supervisory)

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

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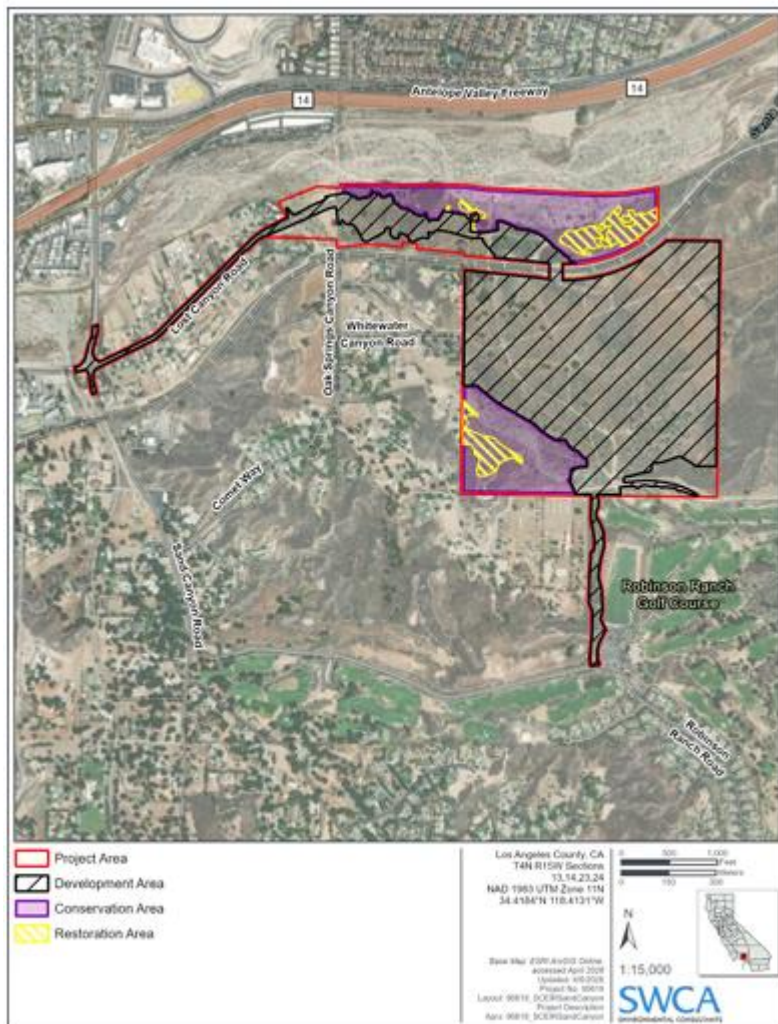


Figure 2-5. Conservation and Restoration Areas.

Figure 1. Map showing Project Area, including development, restoration, and conservation areas. Note the Santa Clara River to the north of the Project Area and south of Antelope Valley Freeway.

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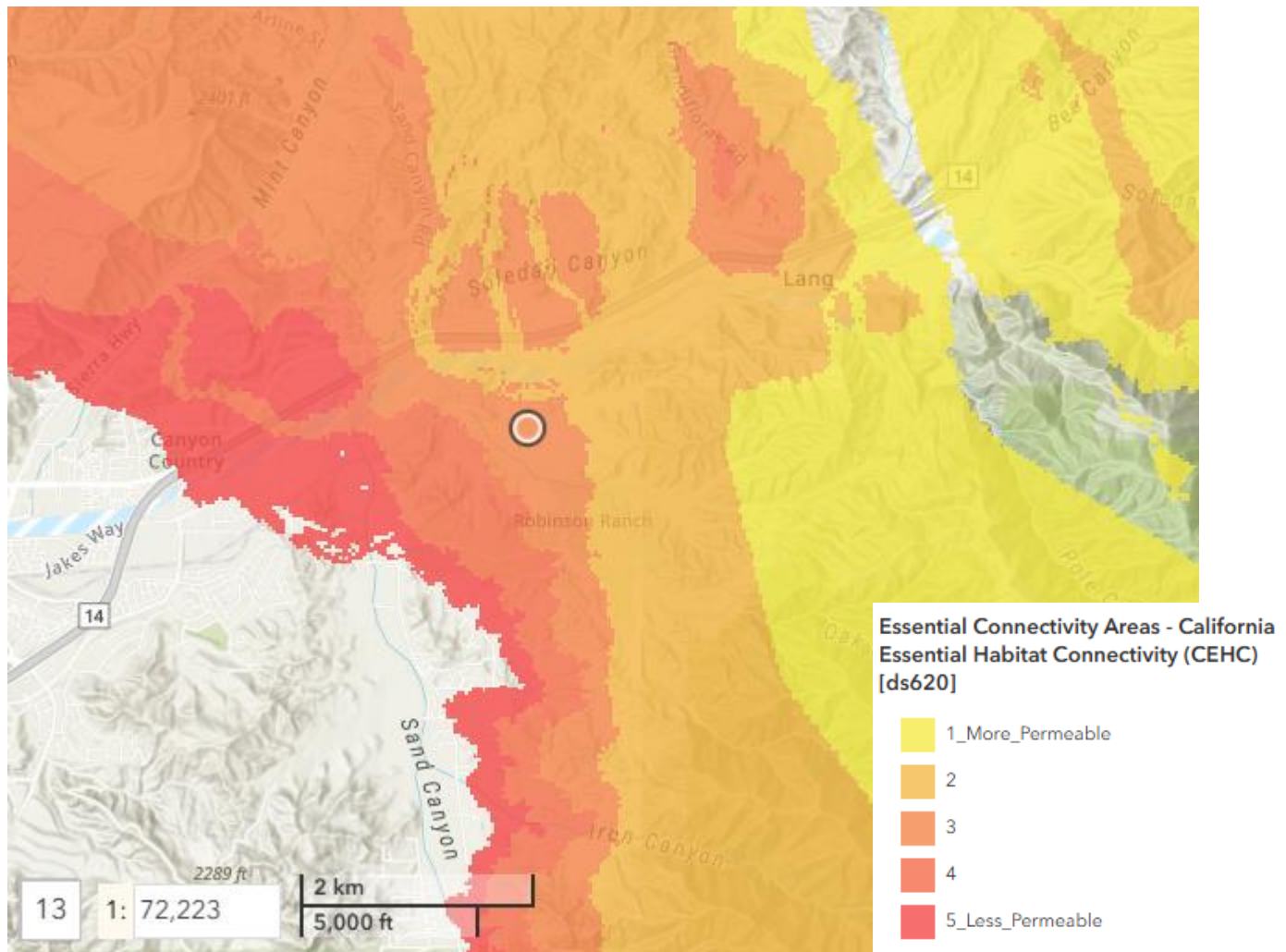


Figure 2. Map showing CDFW Essential Habitat Connectivity's mapped corridors by their permeability. The Project site's approximate midpoint is represented by the circle at 34°25'14.7"N 118°24'30.4"W, in an area of intermediate wildlife permeability.

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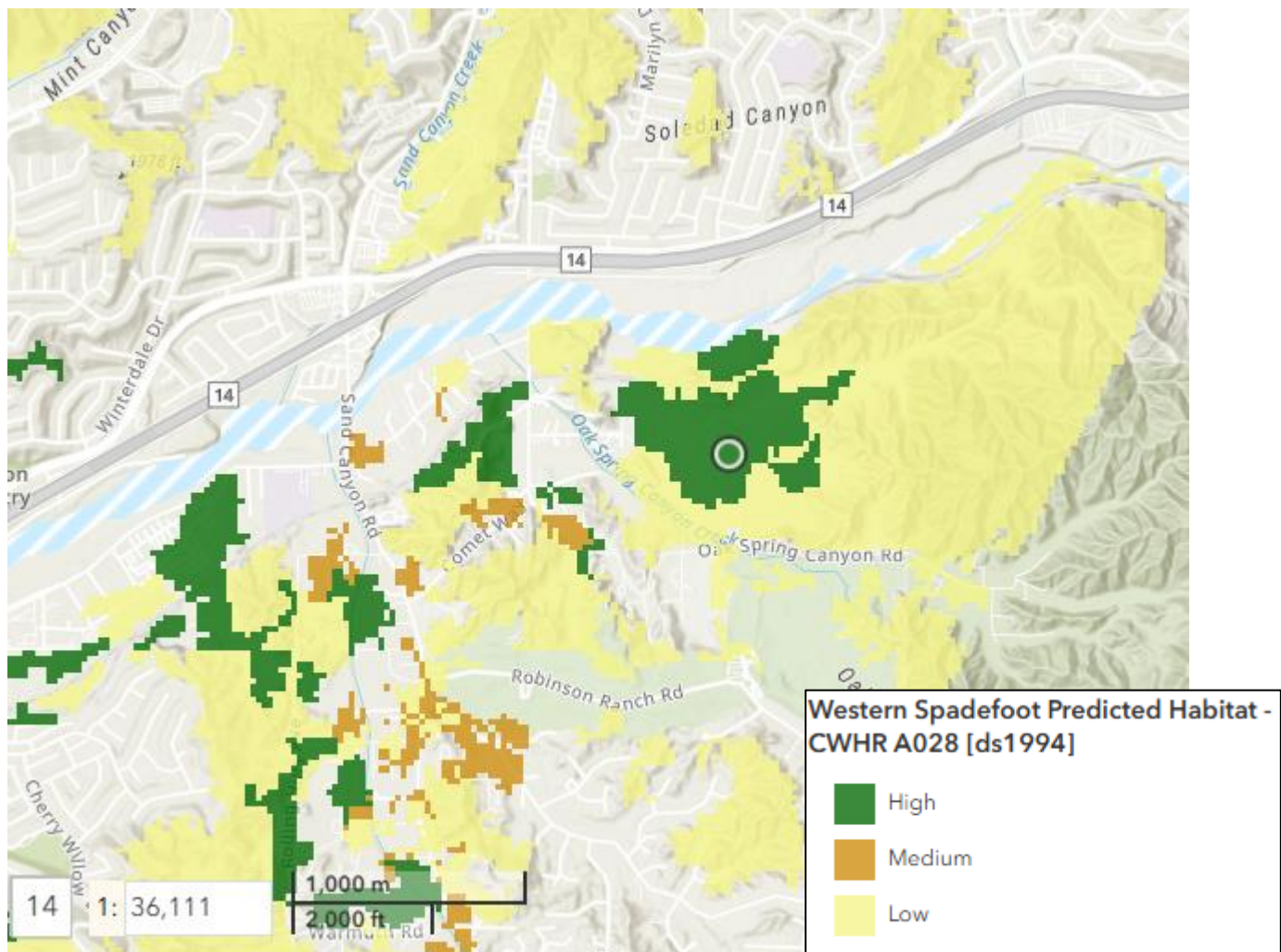


Figure 3. Map showing CDFW Western Spadefoot Predicted Habitat. The Project site's approximate midpoint is represented by the circle at 34°25'14.7"N 118°24'30.4"W, which falls well within high predicted habitat suitability for spadefoot, as well as being in the vicinity of many other highly probable spadefoot habitat locations.

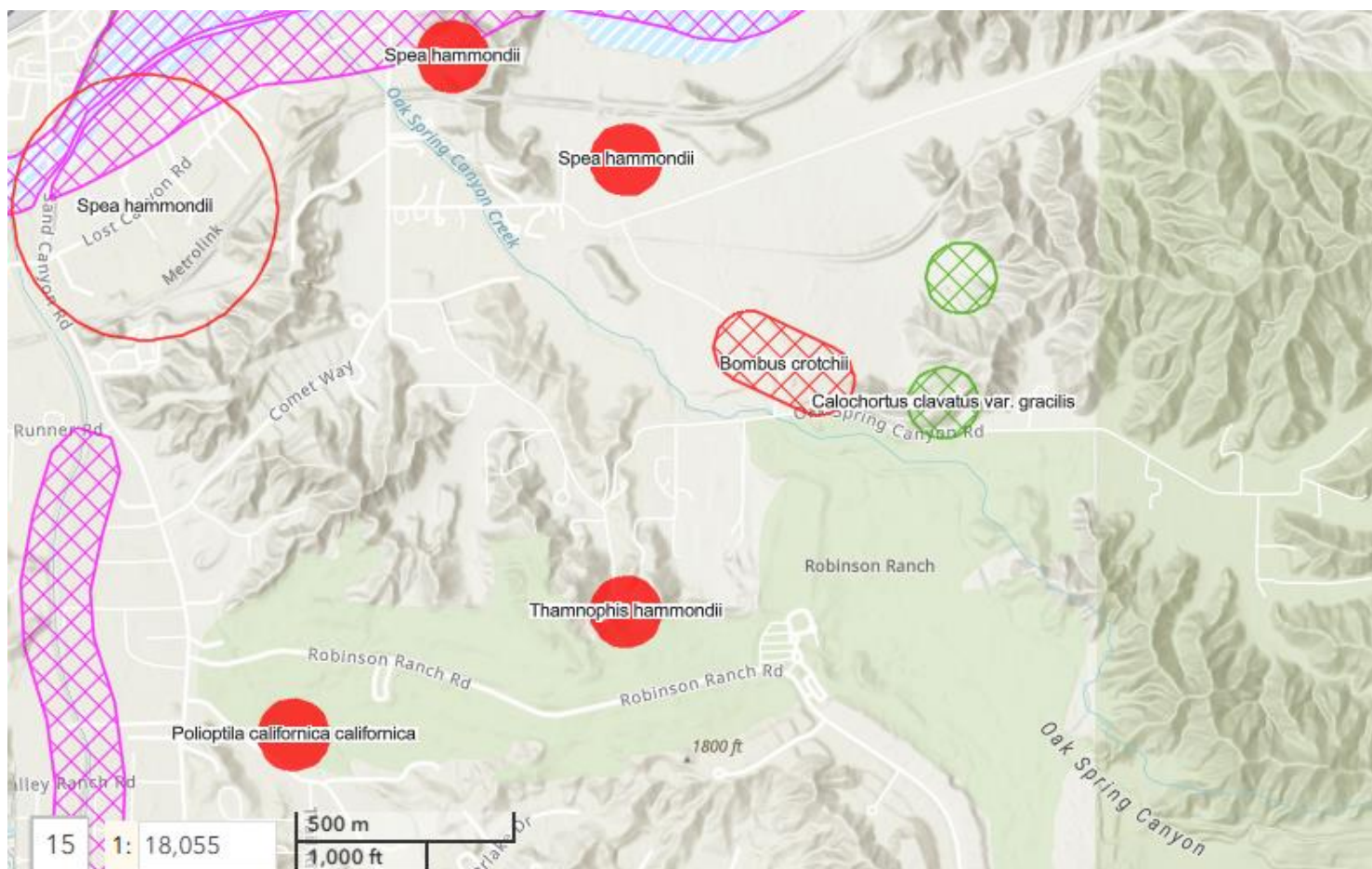


Figure 4. CNDBB occurrences within and surrounding the Project site. These occurrences include *Poliophtila californica californica* (California gnatcatcher), *Spea hammondi* (western spadefoot), *Bombus crotchii* (Crotch's bumblebee), *Calochortus clavatus gracilis* (slender Mariposa lily), and special vegetation communities (purple hatch; Southern Riparian Scrub at the top, along the Santa Clara river, and Southern Coast Live Oak Riparian Forest to the left, along Sand Canyon).



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
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Attachment A. Mitigation Monitoring and Reporting Program (MMRP)

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

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Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
Recommendation #1: CDFW recommends the Project select Alternative 2 or ensure the Project is redesigned to capture the benefits of wildlife connectivity that are critical in this area. The Project's redesign should analyze and disclose its impacts to wildlife connectivity, including, but not limited to, habitat loss and fragmentation, narrowing of wildlife corridors, and introduction of barriers to wildlife movement.	Prior to Project Initiation	Project Proponent
Mitigation Measure #1: The Project's on-site mitigation design shall create a wildlife corridor that maintains east-west and north-south wildlife corridors to, from, and along the Santa Clara River. The corridor shall include a buffer around Oak Springs Canyon Creek to allow for wildlife movement along this tributary. The corridor shall also be of a scientifically defensible wildlife corridor width to maintain wildlife movement in the area. Continued monitoring of any Project wildlife corridor shall be a condition of approval to ensure any approved design continues to provide adequate wildlife movement.	Prior to Project Initiation	Project Proponent
Mitigation Measure #2: The Project shall not include any artificial nighttime lighting or night work	During Project Activities	Project Proponent
Mitigation Measure #3: Human use of any wildlife movement corridor shall be restricted away from structures/paths intended for wildlife movement.	Prior to Project Initiation	Project Proponent
Mitigation Measure #4: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat. At a minimum, the WCMP shall include: Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal	Prior to Project Initiation	Project Proponent

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deterrence, and protection of wildlife and public safety. • Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution. • Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife. • Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate, public education, and maintenance requirements. • Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary. Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.		
Mitigation Measure #5: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address project-related human-wildlife conflicts, without reliance on public agency funding.	Prior to Project Initiation	Project Proponent
Mitigation Measure #6: Permittee is prohibited from undertaking or authorizing activities that result in take of any endangered, threatened, or candidate species, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067,	During Project Activities	Project Proponent

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2068, 2080, 2085; Cal. Code Regs., tit. 14 §786.9.). If bobcat or mountain lion are observed (e.g., individuals observed, sign observed, or otherwise documented) within or adjacent to the Project areas during the course of Project activities, Permittee shall immediately provide written communication to CDFW of the observation and immediately report the sighting through CDFW's Wildlife Incident Reporting System. Project activities shall cease based on the discretion of a Designated Biologist in coordination with CDFW if said Project activities have the potential to result in take of bobcat or mountain lion.		
Recommendation #2: CDFW recommends clustering development, reducing the footprint of the development, and/or eliminating trails and development to reduce the disturbance acreage. CDFW also recommends combining any open space into fewer, larger areas that will be less affected by edge effect, thereby increasing their biological value.	Prior to Project Initiation	Project Proponent
Mitigation Measure #7: The final EIR shall clearly define areas that will be subject to fuel modification and remove this acreage from the conservation area calculations. The EIR should apply the same detail and exclusion for any trail areas, including a scientifically-defensible buffer zone around trails, as they have noted negative consequences for wildlife (Dertien et al., 2021). CDFW considers areas subject to fuel modification (e.g., thinning, trimming, irrigating) impacts to the ecosystem needing to be mitigated.	Prior to Project Initiation	Project Proponent
Recommendation #3: The final EIR's environmental baseline and analysis shall be updated to reflect potential occurrence for listed species, including California gnatcatcher and western spadefoot. This update should include a revised impact calculation that considers the impacts on these species.	Prior to Project Initiation	Project Proponent
Mitigation Measure #8: As western spadefoot is recently a CESA candidate species, it receives full protection under CESA. Therefore, any take of western spadefoot by the Project would require an Incidental Take Permit. Because an Incidental	Prior to Project Initiation	Project Proponent

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Take Permit requires an associated CEQA document with adequate analysis of Project impacts to the focal species to be issued, it is in the Project's best interest that the final EIR includes a thorough analysis of potential impacts to western spadefoot, including a habitat assessment of not just the Project Area but also the surrounding area and potentially species-specific surveys, as determined after discussions with CDFW. Additionally, the City shall incorporate mitigation measures in the EIR that avoid, minimize, and mitigate potential impacts to western spadefoot and the Project shall consult with CDFW if impacts to western spadefoot cannot be avoided.		
Mitigation Measure #9: The final EIR shall require additional surveying for California gnatcatcher prior to Project activities. Surveys should adhere to appropriate survey protocols as described in the USFWS Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Protocol (USFWS 2019). The EIR should also discuss the Project's potential impacts to California gnatcatcher and any supporting habitat. CDFW recommends the City incorporate mitigation measures in the EIR that avoid, minimize, and mitigate potential impacts to California gnatcatcher.	Prior to Project Initiation	Project Proponent
Recommendation #4: When analyzing the current range and extent of CNPS rank 1 and 4 plants, current status and trends for each species shall be assessed in context to the local distribution and recent population status (last 20 years per the Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis recommendations) to sufficiently identify impacts and mitigation measures.	Prior to Project Initiation	Project Proponent
Recommendation #5: CDFW recommends that special-status plants be evaluated for impact significance during preparation of environmental documents relating to CEQA. To assist botanists in evaluating California Rare Plant species for CEQA consideration, the California Native Plant Society (CNPS) has prepared a technical memorandum titled Considerations for Including	Prior to Project Initiation	Project Proponent

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CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis. Additionally, this Project contains rare vegetation alliances and The Considerations for Including California Rare Plant Rank 4 Plant Taxa in CEQA Biological Resource Impact Analysis indicates List 4 plants that are associated with rare vegetation alliances should be fully evaluated in CEQA.		
Recommendation #6: Any mitigation for CEQA-rare plant impacts shall include specific, measurable criteria for success. Monitoring for CEQA-rare vegetation communities should occur for a sufficient time period outside of the installation period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in CEQA-rare plant individuals (counted separately as flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.	Prior to Project Initiation	Project Proponent
Mitigation Measure #10: Given development pressures, habitat loss throughout the County, and the prevalence of surrounding developments, a Documented Conservation Seed Collection of the impacted rare plant species shall be made and deposited at either Santa Barbara Botanic Garden, the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden), or a similar institution. A Documented Conservation Seed Collection is when seed from CNPS ranked 1-4 plants, CEQA-rare, and/or CESA-listed plant species is collected and stored as part of a permanent genetic collection in a protected location. This collection preserves the genome, and any unique alleles that are present in any given occurrence, for future study and reintroduction Projects. Funding should be provided to maintain the collection, as well as conduct periodic germination and viability tests, in perpetuity. Documented conservation collections (long-term storage) are important for conserving rare, gene	Prior to Project Initiation and During Project Activities	Project Proponent

pool representative germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.		
Mitigation Measure #11: The Project shall conduct pre-construction vegetation surveys during the appropriate blooming season for each species following CDFW's Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensitive Natural Communities ¹⁰ to detect any special-status species immediately prior to ground disturbing activities.	Prior to Project Initiation	Project Proponent
Mitigation Measure #12: The Project shall avoid take of rare plants. If avoidance to special-status plants is not possible, the Project shall conserve both the acreage and number of plants impacted by the Project in a conservation easement at a ratio of, at minimum, 3:1 for both the acreage and number of plants. The specific habitat that supports rare plants, and the current density per acre of these plants, should be assessed when formulating mitigation strategies. The Project shall not consider transplantation to adequately mitigation rare plant species under CEQA.	Prior to Project Initiation	Project Proponent
Mitigation Measure #13: If the Project's proposed take includes slender-horned spineflower, the Project applicant shall contact CDFW to discuss an incidental take permit before proceeding.	Prior to Project Initiation	Project Proponent
Mitigation Measure #14: A weed management plan shall be developed for the Project area and implemented during the duration of this Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds shall be prevented from becoming established. The Project area shall be monitored via mapping for new introductions and expansions of non-native weeds.	Prior to Project Initiation	Project Proponent
Mitigation Measure #15: Any sensitive natural communities found on the Project shall be avoided. If avoidance is not feasible, the Project	Prior to Project Initiation	Project Proponent

¹⁰ [Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensi...](#)

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Mitigation Measure #16: The Conservation Management Plan and Habitat Mitigation and Monitoring Plan shall include restoration and monitoring methods; annual success criteria as compared to a reference site and separated by vegetative layers; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. Areas proposed as mitigation shall have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).	Prior to Project Initiation	Project Proponent
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spine stickleback cannot be authorized; however, If impacts to unarmored three-spine stickleback, the Project proponent may consult with CDFW to discuss potential avoidance measures if needed.		
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Landscaping. For individual Projects that will incorporate landscaping, CDFW recommends that the Project applicant should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species listed by the California Invasive Plant Council ¹¹ . These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.	Prior to Project Initiation and During Project Activities	Project Proponent

¹¹ <https://www.cal-ipc.org/plants/inventory/>