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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

November 18, 2025

Paul Zampiello
City of Glendora
116 E Foothill Blvd
Glendora, CA 91741
pzampiello@cityofglendora.gov

Subject: Mitigated Negative Declaration for the North Glendora Reservoir Replacement Project, SCH No. 2025101085, Glendora, CA

Dear Paul Zampiello:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from City of Glendora (City; Lead Agency) for the North Glendora Reservoir Replacement Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

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, 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 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 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

[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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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 City obtain appropriate authorization under the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Glendora

Objective: The objective of the Project is to replace the North Glendora reservoir, which has been leaking for many years. The Project involves the demolition of an existing 0.3-million-gallon (MG) reservoir and the construction of two new 0.3 MG reservoirs on an approximately 2.0-acre site located at the northern terminus of North Glendora Avenue in the City. The following activities are proposed to meet the objective:

1) Site preparation and grading of a new pad west of the existing reservoir pad;
2) Construction of the new 0.3 MG North Glendora Reservoir-A (NGR-A);
3) Demolition of the existing bolted steel reservoir; and,
4) Construction of second 0.3 MG North Glendora Reservoir-B (NGR-B) at approximately the same location as the original reservoir.

Additional improvements would include construction of inlet/outlet pipelines, overflow and bottom drain pipelines, and the widening of the existing reservoir access road.

Reservoir NGR-A

NGR-A would be constructed west of the existing reservoir on a reinforced concrete ring foundation with a 6-inch-thick oiled sand bed. NGR-A would be a welded steel structure and would sit over approximately two feet of crushed rock. NGR-A would have a diameter of 50 feet and a height of 28 feet. The total usable volume in NGR-A would be approximately 242,368 gallons.

A 12-inch diameter ductile iron inlet-outlet pipe (DIP) would be constructed on the side of the proposed NGR-A. The 12-inch DIP would tie into the City’s water system via a proposed 12-inch water line that would be constructed within the access road.

Reservoir NGR-B

NGR-B would be identical to NGR-A and constructed in approximately the same location as the original reservoir. NGR-B would also have a diameter of 50 feet and a height of 28 feet. The total usable volume in NGR-B would be approximately 242,368 gallons.

NGR-B would include a 12-inch diameter DIP that would connect to the proposed 12-inch water line that would be constructed within the access road. Additionally, NGR-B

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would include a connection to the 12-inch diameter polyvinyl chloride drainpipe off NGR-A, which would allow runoff to flow to the existing grouted riprap outlet on the east side of the site.

Location: The Project is located in the northeastern portion of the City of Glendora, in Los Angeles County. The Project location is situated within the foothills of the San Gabriel Mountains, overlooking the San Gabriel Valley to the south. The Project site is located on two adjacent lots on the northerly end of North Glendora Avenue and includes portions of Assessor's Parcel Numbers 8636-015-902 and 8636-015-020. Surrounding land uses include the following:

- North: Undeveloped land, foothills of the San Gabriel Mountains.
- South: Single-Family Residence.
- West: Undeveloped land, foothills of the San Gabriel Mountains.
- East: Single-Family Residence followed by foothills of the San Gabriel Mountains.

Timeframe: Construction of the proposed Project would take approximately 22 months.

Biological Setting: Existing surrounding land uses include rural residential development, associated ornamental vegetation and roadways surrounded by expansive native habitat, such as Diegan coastal sage scrub, coastal sage-chaparral transition, flat-topped buckwheat, open coast live oak woodland, and southern coast live oak riparian forest.

During the initial biological resource assessment in August 2022, seven special-status plant species were determined to have the potential to occur within the Project impact area. While some are not federally or state listed, they do have a California Rare Plant Rank (CRPR). A CRPR of 1B, 2A, or 2B indicates species that are rare throughout their range, endemic to California, and seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet the definitions of CESA and are eligible for state listing (CNPS 2020). These include many-stemmed dudleya (*Dudleya multicaulis;* CRPR: 1B.2), Greata's aster (*Symphyotrichum greatae;* CRPR: 1B.3), white rabbit-tobacco (*Pseudognaphalium leucocephalum;* CRPR: 2B.2), Parry's spineflower (*Chorizanthe parryi var. parryi;* CRPR: 1B.1), San Gabriel Bedstraw (*Galium grande;* CRPR: 1B.2), thread-leaved brodiaea (*Brodiaea filifolia*; state and federally listed; CRPR: 1B.1) and slender mariposa lily (*Calochortus clavatus var. gracilis;* CRPR: 1B.2).

The following special status species were determined to potentially occur within the survey area: Crotch's bumble bee (*Bombus crotchii*; CESA candidate), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens,* CDFW Watch List species), coastal California gnatcatcher (*Polioptila californica californica*; Endangered Species Act [ESA]-listed, California Species of Special Concern [SSC]), yellow-breasted chat (*Icteria virens*; SSC) yellow warbler (*Dendroica petechia*; SSC) pallid bat

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

(*Antrozous pallidus;* SSC), western mastiff bat (*Eumops perotis californicus;* SSC), and big free-tailed bat (*Nyctinomops macrotis;* 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.

COMMENT #1: Impacts to Crotch's Bumble Bee

Issue: The Project has the potential to impact suitable nesting habitat and foraging opportunities for Crotch's bumble bee or may result in direct or indirect mortality.

Specific impact: The Project may result in temporary or permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larvae; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: According to CDFW's Crotch's Bumble Bee Range – CDFW dataset (CDFW 2025), the Project area is within the current range of Crotch's bumble bee. The MND does not reference Crotch's bumble bee in its survey for sensitive wildlife species near the Project area. Based on CDFW's review of the MND, analysis of the property using Google Earth, and reference to CDFW's Crotch's Bumble Bee Range, suitable habitat appears to be present for Crotch's bumble bee. Species-specific surveys were not conducted or incorporated into the MND, despite the presence of suitable habitat. In addition, the MND did not provide any avoidance, minimization, or mitigation measures for Crotch's bumble bee.

Absent appropriate surveys and avoidance, minimization, and mitigation measures, the Project may result in mortality and/or injury of undetected Crotch's bumble bees that may be present during Project activities. The Project's ground and/or vegetation disturbance activities could result in significant impacts to Crotch's bumble bee, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

For reference, Crotch's bumble bees primarily nest from late February through late October and typically nest underground in abandoned small mammal burrows. However, they may also nest under perennial bunch grasses, thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Hatfield et al. 2012).

Evidence impact may be significant: Crotch's bumble bee is a candidate species protected under CESA, and, as such, is granted full protection under CESA. The California Fish and Game Commission (Commission) accepted a petition to list the

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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. 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). CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends that the Lead Agency revise the MND to more fully disclose the presence of suitable habitat, analyze potential impacts, and incorporate enforceable mitigation measures for Crotch's bumble bee. Without this information, the environmental document may not provide a sufficient basis for evaluating potential impacts to this CESA candidate species under CEQA.

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document. These measures are intended to address gaps in the environmental analysis and ensure compliance with CEQA, which requires feasible mitigation for significant impacts to biological resources (CEQA Guidelines, §§ 15064, 15126.4).

Recommendation #1: Crotch's Bumble Bee Analysis: The MND should be revised to provide a thorough discussion on the Project's potential direct and indirect impacts on Crotch's bumble bee throughout the entire Project area. If the Project may impact Crotch's bumble bee, the MND should incorporate measures to minimize, and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA Incidental Take Permit (ITP) can be issued based on the analysis provided in the final document.

Recommendation #2: CESA and CEQA: CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the City for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

Mitigation Measure #1: Crotch's Bumble Bee Surveys: The City shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Species Act Candidate Bumble Bee Species[2]. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing and/or vegetation removal activities.

Mitigation Measure #2: Incidental Take Permit: If Crotch's bumble bee is detected on site, the City shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish & Game Code, § 2080 et seq.).

COMMENT # 2: Impacts to Coastal California Gnatcatcher

Issue: The Project may impact coastal California gnatcatcher nesting and foraging habitat.

Specific impact: Project activities such as grading and vegetation removal may result in the permanent loss of nesting and foraging habitat. Ground-disturbing activities during the breeding and nesting season may also result in nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings.

Why impact would occur: According to the MND, coastal California Gnatcatcher, an SSC and federally listed species, has the potential to occur within the Project area. The proposed Project will have permanent impacts to coastal sage scrub habitat. Coastal California gnatcatcher is an obligate resident of coastal sage scrub habitat. While the City notes that there is potential for this species to be present on site, no species-specific measures are incorporated in the MND since the species was not observed during the August 2022 general biological survey. Subsequent focused surveys have not been conducted to confirm presence/absence of coastal California gnatcatcher. Project activities without the appropriate focused surveys could result in injury or mortality of unidentified gnatcatcher, including eggs or nestlings. Furthermore, grading activities and removal of coastal sage scrub may result in the permanent loss of breeding and foraging habitat for coastal California gnatcatcher.

Evidence impact would be significant: CEQA provides protection for special status species, including coastal California Gnatcatcher, which is an SSC. SSC are considered to meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065). Reductions in the number of special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or

[2] CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

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 and/or the United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends that the City revise the MND to more fully evaluate the potential for coastal California gnatcatcher to occur on site, analyze potential impacts to suitable habitat, and incorporate enforceable mitigation measures. Although not state-listed, the gnatcatcher is federally listed and meets the CEQA definition of rare or threatened species. Without this information, the environmental document may not provide a sufficient base for evaluating potential impacts under CEQA. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document:

Recommendation #3: USFWS Consultation: Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, well in advance of any ground disturbing activities and/or vegetation removal that may impact gnatcatcher.

Mitigation Measure #3: Coastal California Gnatcatcher Surveys: Protocol-level surveys shall be conducted by a CDFW-approved qualified biologist, following the guidelines of the USFWS Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol[3] prior to ground disturbance and/or vegetation removal activities.

COMMENT #3: Impacts on Sensitive Natural Communities

Issue: The Project may impact sensitive natural communities such as coastal sage scrub and southern coast live oak riparian forest.

Specific impacts: Project activities such as vegetation removal and sediment removal would result in temporary or permanent loss of sensitive natural communities.

Why impact would occur: According to the MND, the Project will have temporary and permanent impacts to sensitive natural communities, such as open coast live oak woodland and coastal sage scrub. The MND's Mitigation Measure BIO-3 proposes a 1.3:1 mitigation ratio for permanent and temporary impacts in their Conceptual Restoration Plan (CRP). The implementation of Mitigation Measure BIO-3 may not (1) provide a sufficiently large buffer to avoid take, (2) commit adequate mitigation for the

[3] USFWS Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. Available at: https://www.fws.gov/sites/default/files/documents/survey-protocol-for-coastal-california-gnatcatcher.pdf

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Project, (3) adopt specific performance standards that the mitigation will achieve, and/or (4) identify the type(s) of potential action(s) that can feasibly achieve the performance standard(s) to be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4).

Evidence impact would be significant: This area supports coastal sage scrub habitat that likely supports the federally listed coastal California gnatcatcher, as well as other nesting birds such as yellow-breasted chat and yellow warbler. CDFW considers adverse impacts to special status species protected by CESA and ESA, for the purposes of CEQA, to be significant without mitigation. Additionally, CEQA requires impacts to sensitive natural communities, including those identified in local or regional plans or recognized by CDFW, be evaluated and mitigated to the extent feasible. Sensitive natural communities such as Deigan coastal sage scrub and southern coast live oak riparian forest are recognized in CDFW's Vegetation Classification and Mapping Program (VegCamp) and are considered rate in the state. As for CESA, take of any State endangered, threatened, candidate species, or listed rare plant species pursuant to the NPPA that results from the Project is prohibited, except as authorized by State law (Fish and Game Code, § 2080, 2085; Cal. Codes Regs., tit. 14, § 786.9). 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".

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends that the City revise Mitigation Measure BIO-3 to ensure it includes enforceable performance standards, success criteria, and long-term monitoring and adaptive management plan. These elements are necessary to demonstrate that the mitigation will be effective and feasible, as required under CEQA Guidelines § 15126.4.

Mitigation Measure-BIO-3: Mitigation Measure Revision. CDFW recommends that MM-BIO-5 is revised to incorporate the underlined language for sensitive vegetation communities and omit the language in strikethrough:

Mitigation Measure BIO-3: Restore Temporary Impact Areas. Prior to the issuance of a grading permit, the Project proponent shall have a qualified biologist prepare a Habitat Restoration Plan that will detail requirements for mitigating impacts to Open Coast Live Oak Woodland [CLOW] and Diegan Coastal Sage scrub [DCSS], deemed sensitive within the Glendora Community Plan. The plan will require that temporary impact areas are restored with native vegetation to include plant species currently found on site and will be maintained until the vegetation is self-sustaining without supplemental irrigation or additional planting. Temporary impact areas containing sensitive (DCSS and CLOW) and non-sensitive habitat types (Coastal Sage – Chaparral Transition [CSCT] and Flat-topped Buckwheat Scrub [FTBS]), shall be restored/enhanced with DCSS and CLOW to provide mitigation ratio of sensitive habitat 2:1~~1.3:1~~ ratio . Total vegetation cover should be equal to or greater than pre-construction levels. Nonnative species shall not be used during restoration planting.

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Weed species within the restoration area shall be controlled until the site is adequately restored per the requirements outlined in the CRP. The Habitat Restoration Plan shall also include measurable success criteria, a minimum five-year monitoring period, and adaptive management strategies to ensure restoration goals are met.

COMMENT # 4: Impacts to Nesting Birds

Issue: The Project may potentially result in the loss of foraging and nesting habitat for nesting birds.

Specific impact: Project activities may result in a loss of refugia, nest abandonment, and/or decreased feeding frequency. This could result in increased nestling mortality, which would constitute a significant impact on nesting birds.

Why impact would occur: Project activities include vegetation and tree removal, grading, construction, and demolition. Project activities are likely to result in elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings.

Evidence impact may be significant: A temporary halt of Project activities within buffer zones during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat and tree loss. Effective mitigation is necessary to compensate for the long-term and temporal loss of ecological function, including permanent removal of nesting and foraging habitat. To ensure habitat and tree losses are sufficiently offset, mitigation should be designed to replace or enhance habitat of equal or greater ecological value, based on acreage of impact, tree loss, quality and composition of vegetation, and conservation status of the wildlife species affected. The Mitigation Measures proposed in the MND may not provide a sufficiently large buffer to avoid impacts, and/or commit adequate mitigation for the Project and may not reduce potential impacts to nesting birds to less-than-significant levels (CEQA Guidelines, § 15126.4).

Recommended Potentially Feasible Mitigation Measure(s)

To ensure compliance with CEQA's requirements for feasible and effective mitigation, CDFW recommends the following revisions to Mitigation Measures BIO-2 and BIO-3 to strengthen protections for nesting birds and their habitat.

Recommendation #4: Compensatory Mitigation for Nesting Bird Habitat. CDFW recommends the City follow CDFW's revision's to Mitigation Measure BIO-2 and BIO-3:

Mitigation Measure-BIO-2: Mitigation Measure Revision. CDFW recommends that BIO-2 be revised to incorporate the underlined language and omit the language in strikethrough:

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Mitigation Measure BIO-2: Conduct Vegetation Clearing/Initial Grading Outside of the Bird Nesting Season OR Conduct Pre-Construction Nesting Bird Surveys. Project construction and grading plans shall state that ground-disturbing and vegetation-clearing activities should occur outside of the breeding season (February 15 – September 15). If vegetation removal or initial grading occurs during the breeding season, nesting bird surveys shall be conducted by a qualified biologist for nesting raptors and migratory birds and within an additional a 150-foot buffer for common avian species, 300 feet for listed or highly sensitive species, and 500 feet for raptors. ~~100-foot survey buffer (for passerines) and 300-foot buffer for raptors~~ within 3 days of construction. If nests of listed birds, migratory birds, raptors, or other sensitive species are documented, active nests will be avoided, and a nest buffer will be designated around each nest. Nest buffers will be determined at the discretion of the qualified biologist based on the location and species occupying the nest. ~~Species that are not covered by the MBTA (such as European starling, house sparrow, Eurasian collared dove, etc.) will not require a nest buffer.~~ The perimeter of this nest buffer will be clearly demarcated, and all construction activities will be prohibited within the delineated area until a qualified biologist has determined that the nest has either successfully fledged, been depredated, or failed due to other causes. Construction activities may proceed within the non-disturbance buffer if a qualified biologist is present to monitor active nests and determines that construction activities are not causing indirect or direct disturbance to a nest. All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. Construction activities shall avoid any active nests and buffer zones until a qualified biologist has verified that the young have fledged or the nest has otherwise become inactive. A memorandum shall be prepared at the conclusion of surveys and submitted to CDFW. The memorandum shall include graphics and figures as necessary to support the results of the survey. CDFW shall be notified if/'when any special status species is observed onsite.

ADDITIONAL COMMENTS

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a Mitigation Monitoring and Reporting Plan to assist in the development of feasible, specific, and detailed mitigation measures. These measures should identify the responsible party, timing, specific actions, and location, and must be fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is encouraged to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

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 CNDDB. The CNDDB website[4] provides direction regarding the types of information that should be reported and allows online submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[5]. The City should ensure data collected for the preparation of the MND is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City 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 MND 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)).

[4] The California Natural Diversity Database. Available at: https://wildlife.ca.gov/Data/CNDDB
[5] CDFW's Vegetation Classification and Mapping Program. Available at: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Questions regarding this letter or further coordination should be directed to Mary Ngo[6], Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:
Heather A. Pert
DF423498814B441...

11/18/2025

Heather A. Pert
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Baron Barrera, Senior Environmental Scientist (Supervisory)
Felicia Silva, Senior Environmental Scientist (Specialist)
Cassie Bretz, Scientific Aide
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

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

[6] Phone: (562) 477-0743; Email: Mary.Ngo@wildlife.ca.gov

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

REFERENCES

[CDFW] California Department of Fish and Wildlife. 2025. Crotch's Bumble Bee Range Dataset 3095. Available at CDFW's Biogeographic Information and Observation System, https://wildlife.ca.gov/Data/BIOS

Hatfield, R, S Jepsen, E Mader, S H Black, and M Shepherd. 2012. Conserving Bumble Bees Guidelines for Creating and Managing Habitat for America's Declining Pollinators. Portland, OR: The Xerces Society for Invertebrate Conservation

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

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

Mitigation Measure	**Timing**	**Responsible Party**
Mitigation Measure #1: Crotch's Bumble Bee Surveys: The City shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species[7]. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing and/or vegetation removal activities.	Before Pre-Project Activities	Lead Agency; Project Proponent
Mitigation Measure #2: Incidental Take Permit: If Crotch's bumble bee is detected on site, the City shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish & Game Code, § 2080 et seq.).	Before Pre-Project Activities	Lead Agency; Project Proponent
Mitigation Measure #3: Coastal California Gnatcatcher Surveys: Protocol-level surveys shall be conducted by a CDFW-approved qualified biologist, following the guidelines of the USFWS Coastal California Gnatcatcher (*Polioptila californica*	Before Pre-Project Activities	Lead Agency; Project Proponent

[7] CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

Docusign Envelope ID: D85A3FD7-1C27-4915-818F-4A99534D84B1

Mitigation Measure	Timing	Responsible Party
californica) Presence/Absence Survey Protocol[8] prior to ground disturbance and/or vegetation removal activities.		
Mitigation Measure-BIO-2: Mitigation Measure Revision. CDFW recommends that BIO-2 be revised to incorporate the underlined language and omit the language in strikethrough: **Mitigation Measure BIO-2: Conduct Vegetation Clearing/Initial Grading Outside of the Bird Nesting Season OR Conduct Pre-Construction Nesting Bird Surveys.** Project construction and grading plans shall state that ground-disturbing and vegetation-clearing activities should occur outside of the breeding season (February 15 – September 15). If vegetation removal or initial grading occurs during the breeding season, nesting bird surveys shall be conducted by a qualified biologist for nesting raptors and migratory birds and within an additional a 150-foot buffer for common avian species, 300 feet for listed or highly sensitive species, and 500 feet for raptors. ~~100-foot survey buffer (for passerines) and 300-foot buffer for raptors~~ within 3 days of construction. If nests of listed birds, migratory birds, raptors, or other sensitive species are documented, active nests will be avoided, and a nest buffer will be designated around each nest. Nest buffers will be determined at the discretion of the qualified biologist based on the location and species occupying the nest. ~~Species that are not covered by the MBTA (such as European starling, house sparrow, Eurasian collared dove, etc.) will not require a nest buffer.~~ The perimeter of this nest buffer will be clearly demarcated, and all construction activities will be prohibited within the delineated area until a qualified biologist has determined that the nest has either successfully fledged, been depredated, or failed due to other causes. Construction activities may proceed	Before Pre-Project Activities	Lead Agency; Project Proponent

[8] USFWS Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. Available at: https://www.fws.gov/sites/default/files/documents/survey-protocol-for-coastal-california-gnatcatcher.pdf

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Mitigation Measure	Timing	Responsible Party
within the non-disturbance buffer if a qualified biologist is present to monitor active nests and determines that construction activities are not causing indirect or direct disturbance to a nest. All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. Construction activities shall avoid any active nests and buffer zones until a qualified biologist has verified that the young have fledged or the nest has otherwise become inactive. A memorandum shall be prepared at the conclusion of surveys and submitted to CDFW. The memorandum shall include graphics and figures as necessary to support the results of the survey. CDFW shall be notified if/'when any special status species is observed onsite.		
Mitigation Measure-BIO-3: Mitigation Measure Revision. CDFW recommends that MM-BIO-5 is revised to incorporate the underlined language for sensitive vegetation communities and omit the language in strikethrough: **Mitigation Measure BIO-3: Restore Temporary Impact Areas.** Prior to the issuance of a grading permit, the Project proponent shall have a qualified biologist prepare a Habitat Restoration Plan that will detail requirements for mitigating impacts to Open Coast Live Oak Woodland [CLOW] and Diegan Coastal Sage scrub [DCSS], deemed sensitive within the Glendora Community Plan. The plan will require that temporary impact areas are restored with native vegetation to include plant species currently found on site and will be maintained until the vegetation is self-sustaining without supplemental irrigation or additional planting. Temporary impact areas containing sensitive (DCSS and CLOW) and non-sensitive habitat types (Coastal Sage – Chaparral Transition [CSCT] and Flat-topped Buckwheat Scrub [FTBS]), shall be restored/enhanced with DCSS and CLOW to provide mitigation ratio of sensitive habitat 2:1~~1.3:1~~ ratio . Total vegetation cover should be equal to or greater than pre-	Before Pre-Project Activities	Lead Agency; Project Proponent

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Mitigation Measure	**Timing**	**Responsible Party**
construction levels. Nonnative species shall not be used during restoration planting. Weed species within the restoration area shall be controlled until the site is adequately restored per the requirements outlined in the CRP. The Habitat Restoration Plan shall also include measurable success criteria, a minimum five-year monitoring period, and adaptive management strategies to ensure restoration goals are met.		