



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
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May 11, 2026

Dawn Peschauer
City of Pasadena
100 North Garfield Avenue
Pasadena, CA 91101
dpetschauer@cityofpasadena.net

Subject: Mitigated Negative Declaration for the Eaton Wash Stormwater Capture Project, SCH No. 2026040378, City of Pasadena, Los Angeles County, CA

Dear Dawn Peschauer:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the City of Pasadena (City) for the Eaton Wash Stormwater Capture Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

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

CDFW ROLE

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

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projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Pasadena

Objective: The proposed Project consists of the construction and operation of a stormwater capture, treatment, and infiltration facility on a vacant 3.91-acre property east of the Eaton Wash Channel. The Project also consists of developing passive park uses, a dog park, and a community garden within the Project site, and constructing a pedestrian bridge over the channel connecting the new features east of Eaton Wash to Eaton Blanche Park. The stormwater capture and treatment facility would intercept stormwater and dry-weather flow from the Eaton Wash Channel and divert it into a subterranean concrete basin.

Location: The Project site is located in the southeastern portion of the City, near the boundary of unincorporated Los Angeles County (County). The site includes a channelized segment of the Eaton Wash Channel.

Timeline: The Project is proposed to begin construction in July 2027 and will occur for 22 months.

Biological Setting: The Project site features scattered trees and shrubs, debris from prior vegetation-removal efforts, and remnants of former uses such as wooden railings and planter boxes, a concrete foundation, chain-link perimeter fencing, and a wooden

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sign. The southeastern portion of the Project site is on Southern California Edison (SCE) owned property within an SCE overhead electrical transmission right-of-way, which features two steel towers. The land within the SCE right-of-way is currently leased to a commercial nursery and is used to grow and store container plants. The Eaton Wash Channel is a fully concrete-lined channel. West of the channel, the Project site includes a portion of the City-owned Eaton Blanche Park, featuring mature ornamental trees and coast live oak woodland and forest along the edge of the channel, as well as a grass field that abuts the park's playground, walking paths, and picnic areas to the northwest.

The Project site has the potential to support a variety of sensitive wildlife species, including, Southern California legless lizard (*Anniella stebbinsi*; California Species of Special Concern [SSC]), Crotch's bumble bee (*Bombus crotchii*; CESA candidate), burrowing owl (*Athene cunicularia*; CESA candidate), and Cooper's hawk (*Accipiter cooperii*, Watch List)

Additionally, the Project site may support several common native and nonnative bird species, including turkey vulture (*Cathartes aura*), common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), and red-tailed hawk (*Buteo jamaicensis*).

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 may adversely impact Crotch's bumble bee.

Specific impacts: 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 to adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: According to California's Natural Diversity Database (CNDDDB), there have been historical observations of Crotch's bumble bee throughout

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Los Angeles County (CDFW 2026a). In addition to regional observations, the Project area lies within the home range of Crotch's bumble bee (CDFW 2026a). Crotch's bumble bee may occur throughout the County and utilize areas that have suitable nesting habitat and floral resources. Crotch's bumble bee primarily nests from late February through late October, underground in abandoned small mammal burrows. With small mammal burrows present on the Project site, suitable habitat for Crotch's bumble bee is present. Crotch's bumble bee may also nest under perennial bunch grasses, thatched annual grasses, brush piles, as well as in old bird nests, dead trees, or hollow logs (Williams et al. 2014). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or areas under leaf litter or other debris (Williams et al. 2014).

The MND does not address the potential presence of Crotch's bumble bee or provide species-specific measures to reduce impacts to less than significant if present during Project activities. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of the colony, disrupt breeding success, and/or lead to nest abandonment in areas within and adjacent to the Project site. Potential habitat loss, as a result of the proposed Project, may also reduce foraging habitat for this species in the broader landscape as development increases throughout the County.

Evidence impacts would be significant: The California Fish and Game Commission accepted a petition to list the 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. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a state ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, §

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15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: Habitat Assessment. The MND should be revised to provide a discussion on habitat suitability for Crotch's bumble bee within and adjacent to the Project site. The discussion should also disclose the Project's potential direct and indirect impacts on Crotch's bumble bee. If the Project may impact Crotch's bumble bee, the MND should provide 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 can be issued based on the analysis provided in the MND.

Recommendation #2: CEQA Analysis. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the MND from the City for the Project's impacts to Crotch's bumble bee (see Recommendation #1).

Mitigation Measure #1: Protocol Level Surveys. The Project proponent shall retain a qualified entomologist 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 (CDFW 2023). Focused surveys shall also be conducted throughout the Project site 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 and the City prior to implementing Project ground-disturbing activities.

Mitigation Measure #2: Incidental Take Permit. If Crotch's bumble bee is detected the Project proponent shall coordinate with California Department of Fish and Wildlife (CDFW) and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and/or vegetation removal.

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Comment #2: Nesting Avian Species

Issue: The Project may impact a wide range of nesting avian species.

Specific impacts: Several sensitive species have been regularly observed nesting and foraging throughout the Pasadena area. Project impacts could result in increased nestling mortality and reduced reproductive success, representing a significant impact on these imperiled species. The Project may also result in loss of breeding and/or foraging habitat.

Why impacts would occur: The Project area contains suitable habitat, including suitable nesting trees, and recently documented occurrences of nesting and wintering avian species, including observations recorded in CNDDDB and regional bird surveys. Project activities include vegetation and tree removal, grading, and construction. Project activities are likely to result in elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. Vegetation proposed for removal, including trees, provides important nesting substrates, thermal cover, and foraging perches for migratory and raptor species. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. Such impacts may exceed CEQA thresholds for significant by contributing to nest failure, reproductive disruption, and habitat degradation for multiple special-status species. Mitigation Measure MM-BIO-3, MM-BIO-5 may not (1) provide a sufficiently large buffer to avoid take, (2) commit adequate mitigation for the Project (particularly if take occurs), (3) adopt specific performance standards 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(a)(1)(B)).

Evidence impacts would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

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An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- Is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- Is listed under the federal Endangered Species Act, but not CESA;
- Meets the State definition of threatened or endangered but has not formally been listed;
- Is experiencing, or formerly experienced, serious (non-cyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify the species for State threatened or endangered status; and/or,
- Has naturally small populations exhibiting high susceptibility to risk from any factor(s) that, if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2025c).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSCs, that can be shown to meet the criteria for State listing. These SSCs meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSCs could require a mandatory finding of significance (CEQA Guidelines, § 15065). Insufficient avoidance and mitigation measures could result in substantial direct and cumulative adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

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

MM-BIO-3 Compliance with Migratory Bird Treaty Act and California Fish and Game Code. The proposed project shall be conducted in compliance with all applicable regulations, including the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code regarding migratory birds. Pursuant to the MBTA

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and California Fish and Game Code, a qualified biologist shall conduct a pre-construction survey for nesting birds and raptors within the project site and a 500-foot-wide buffer no more than 3 days prior to any vegetation disturbance during the general avian breeding season (February 1– September 30). The project shall avoid take of nesting birds protected under the MBTA and California Fish and Game Code by establishing appropriate no-construction buffer zones around any nests identified during the surveys. The buffer should be 150-300 feet for non-raptor nesting birds, 300 feet for highly sensitive species, and 300–500 feet for nesting raptors. Construction can proceed into the buffer when the qualified Biologist has determined that the nest is no longer active. If the biologist does not find any active nests within or immediately adjacent to the impact areas, the vegetation clearing/ construction work would be allowed to proceed. If the biologist finds an active nest within or immediately adjacent to the vegetation removal area and determines that the nest may be impacted or breeding activities substantially disrupted, the biologist shall delineate an appropriate no-work buffer zone around the nest, depending on the sensitivity of the species, the location of the nest, and the nature of the construction activity, at their discretion. Construction personnel shall be instructed on the sensitivity of nest areas and no-work buffers shall remain in place until the nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging or fencing, and construction personnel shall be instructed on the sensitivity of nest areas.

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

Post-Construction Tree Monitoring. All trees that have been substantially root pruned (30% or more of their root zone) during construction within the tree protection zone (a 4-foot radius beyond the dripline for each tree) shall be monitored by an International Society of Arboriculture (ISA) certified arborist for the first 5 years after construction completion, and for the first 10 years for coast live oak replacement trees. The arborist shall submit an annual report, photograph each tree, and compare tree health and condition to the original, pre-construction baseline to the City. For trees that do not survive the 5 to 10-

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year monitoring period, such trees shall be replaced in accordance with the requirements of PMC Chapter 8.52.

Mitigation and Monitoring Reporting Plan

CDFW recommends the City adopt the mitigation measures and recommendations in this letter into the MND. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines, section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, and location), and (4) clear to ensure successful implementation through a mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., CNDDDB), which may be used to inform subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, sub. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online (CDFW 2026b). Please visit CDFW online to access the types of information reported to CNDDDB. Information on special status native plant populations and sensitive natural communities and the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2026c).

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and

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assessment of environmental document filing fees is required. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

Conclusion

CDFW appreciates the opportunity to comment on the MND and to support the City in identifying and mitigating Project impacts to biological resources. To ensure significant impacts are adequately mitigated to less-than-significant level, we recommend incorporating the feasible mitigation measures described above should be incorporated as enforceable conditions in the MND for the Project. CDFW requests the opportunity to coordinate with the City on responses to these comments prior to adoption of the final environmental document. We also request 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 Mary Ngo¹, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:
Baron Barrera
57FC783AB67942E...

5/11/2026

Barron Barrera
Senior Environmental Scientist (Supervisory); acting for Victoria Tang
South Coast Region

ATTACHMENTS

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Baron Barrera, Senior Environmental Scientist (Supervisory)
Cindy Hailey, Staff Services Analyst

¹ Phone: (562) 477-0743; Email: Mary.Ngo@wildlife.ca.gov

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CEQA Program Coordinator – Sacramento

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

REFERENCES

[CDFW] California Department of Fish and Wildlife. 2023. 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>

[CDFWa] California Department of Fish and Wildlife. 2026a. Crotch's Bumble Bee Range Dataset 3095. Available at CDFW's Biogeographic Information and Observation System, <https://wildlife.ca.gov/Data/BIOS>

[CDFWb] California Department of Fish and Wildlife. 2026b. California Natural Diversity Database. Available at: <https://wildlife.ca.gov/Data/CNDDDB>

[CDFWc] California Department of Fish and Wildlife. 2026c. Vegetation Classification and Mapping Program. Available at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Goulson, D. 2010. Introduction. In: Goulson, D., Ed., *Bumblebees: Behaviour, Ecology, and Conservation*, Oxford University Press, Oxford, 1-12.

Williams, P.H., R.W. Thorp, L.L. Richardson, and S.R. Colla. 2014. *Bumble bees of North America: an Identification Guide*. Princeton University Press. 208 pp.

| Attachment A: Mitigation and Monitoring Reporting Plan | | |
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| Mitigation Measures | Timing | Responsible Party |
| <p>MM-BIO-3: Mitigation Measure Revision. CDFW recommends that MM-BIO-3 is revised to incorporate the underlined language and omit the language in strikethrough: <i>MM-BIO-3 Compliance with Migratory Bird Treaty Act and California Fish and Game Code.</i> The proposed project shall be conducted in compliance with all applicable regulations, including the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code regarding migratory birds. Pursuant to the MBTA and California Fish and Game Code, a qualified biologist shall conduct a pre-construction survey for nesting birds and raptors within the project site and a 500-foot-wide buffer no more than 3 days prior to any vegetation disturbance during the general avian breeding season (February 1– September 30). The project shall avoid take of nesting birds protected under the MBTA and California Fish and Game Code by establishing appropriate no-construction buffer zones around any nests identified during the surveys. <u>The buffer should be 150-300 feet for non-raptor nesting birds, 300 feet for highly sensitive species, and 300–500 feet for nesting raptors. Construction can proceed into the buffer when the qualified Biologist has determined that the nest is no longer active.</u> If the biologist does not find any active nests within or immediately adjacent to the impact areas, the vegetation clearing/ construction work would be allowed to proceed. If the biologist finds an active nest within or immediately adjacent to the vegetation removal area and determines that the nest may be impacted or breeding activities substantially disrupted, the biologist shall delineate an appropriate no-work buffer zone around the nest, depending on the sensitivity of the species, the location of the nest, and the nature of the construction activity, at their discretion. Construction personnel shall be instructed on the sensitivity of nest areas and no-work buffers shall remain in place until the nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |

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| <p>flagging or fencing, and construction personnel shall be instructed on the sensitivity of nest areas.</p> | | |
| <p>MM-BIO-5: Mitigation Measure Revision. CDFW recommends that MM-BIO-5 is revised to incorporate the underlined language and omit the language in strikethrough: <i>Post-Construction Tree Monitoring.</i> All trees that have been substantially root pruned (30% or more of their root zone) during construction within the tree protection zone (a 4-foot radius beyond the dripline for each tree) shall be monitored by an International Society of Arboriculture (ISA) certified arborist for the first 5 years after construction completion, <u>and for the first 10 years for coast live oak replacement trees</u>. The arborist shall submit an annual report, photograph each tree, and compare tree health and condition to the original, pre-construction baseline to the City. For trees that do not survive the <u>5 to 10-year</u> monitoring period, such trees shall be replaced in accordance with the requirements of PMC Chapter 8.52.</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |
| <p>Mitigation Measure #1: Protocol Level Surveys. The Project proponent shall retain a qualified entomologist 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 (CDFW 2023). Focused surveys shall also be conducted throughout the Project site 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 and the City prior to implementing Project ground-disturbing activities.</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |
| <p>Mitigation Measure #2: Incidental Take Permit. If Crotch’s bumble bee is detected the Project proponent shall coordinate with California Department of Fish and Wildlife (CDFW) and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |

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| <p>proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and/or vegetation removal.</p> | | |
| <p>Recommendation #1: <i>Habitat Assessment.</i> The MND should be revised to provide a discussion on habitat suitability for Crotch’s bumble bee within and adjacent to the Project site. The discussion should also disclose the Project’s potential direct and indirect impacts on Crotch’s bumble bee. If the Project may impact Crotch’s bumble bee, the MND should provide 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 can be issued based on the analysis provided in the MND.</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |
| <p>Recommendation #2: <i>CEQA Analysis.</i> CDFW’s issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the MND from the City for the Project’s impacts to Crotch’s bumble bee (see Recommendation #1).</p> | <p>Prior to finalizing CEQA document; and Prior to construction.</p> | <p>Project Proponent / Lead Agency</p> |