



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
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South Coast Region
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August 5, 2026

Shannon Edwin
City of Lancaster
44933 Fern Ave.
Lancaster, CA 93534
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Subject: Mitigated Negative Declaration for the Site Plan Review No. 25-007 (Lancaster Travel Center) Project, SCH No. 2026070308, Los Angeles County, CA

Dear Shannon Edwin:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the City of Lancaster (City) for the Site Plan Review No. 25-007 (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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

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.
Conserving California's Wildlife Since 1870

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efforts, focusing specifically on 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 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: City of Lancaster

Objective: The objective of the Project is to construct and operate a 9,240 square foot (sf) travel center with an adjoining 2,000-sf quick-service restaurant and two additional 3,400-sf quick-service restaurants. Diesel fuel pumps would be installed to allow for fueling of five trucks, and eight fuel pumps would be installed to accommodate up to 16 passenger automobiles. Two above-ground propane storage tanks, two underground gasoline storage tanks, and four above ground diesel storage tanks would be developed within the Project site. Additional infrastructure includes drive-throughs, parking, pedestrian infrastructure, trash enclosures, signage and wayfinding, landscaping, etc.

Location: The Project site is located in the City of Lancaster, CA, on approximately 10.65 acres on the southeast corner of Avenue H and 25th Street West, Los Angeles County Assessor's Parcel Number (APN) 3114-012-029, -064, -066, and -062. The proposed Project site is vacant and the properties to the west and south are vacant. California State Route 14 borders the Project site to the East. The Antelope Valley Fair and Event Center (Fairgrounds) is directly north of the Project site across Avenue H.

Biological Setting: The Project site is undeveloped and exhibits signs of disturbance. The site has recently been used as vehicle parking for the Fairgrounds to the north. General habitat assessments and biological surveys for special-status species were performed on May 24, 2025, and June 11, 2026. Survey findings were compiled in a Biological Resources Assessment

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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(BRA), dated May 28, 2025, and revised January 22, 2026. An additional BRA was completed on June 12, 2026. As part of the Aquatic Resources Delineation for the Project, a field survey of the site was conducted on November 25, 2025.

According to the BRA, the dominant annual plant species within the Project site consisted of grasses. Allscale (*Atriplex polycarpa*) was observed along Avenue H and the remainder of the site was devoid of perennial shrub species. No sensitive natural communities were observed, and no rare plants were identified during the surveys. Marginal habitat for alkaline mariposa lily was found on a portion of the site. A drainage channel borders the Project site to the east and north. The City has incorporated a mitigation measure in the MND requiring that, prior to beginning any construction activities on the Project site, the applicant shall obtain a Lake and Streambed Alteration Agreement issued by CDFW.

Protected, rare, threatened, and endangered species of wildlife that have the potential to be on or near the Project site include the desert tortoise (*Gopherus agassizii*), Mohave ground squirrel (*Xerospermophilus mohavensis*), desert kit fox (*Vulpes macrotis*), burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), and Crotch's bumblebee (*Bombus crotchii*). No special status wildlife species or related suitable habitat were observed during the biological surveys. The City has incorporated mitigation measures in the MND to require pre-activity nesting bird and raptor surveys and a burrowing owl clearance survey.

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. Additional comments or other suggestions are also included to improve the document.

COMMENT # 1: Impacts to Rare Plants

Issue: The proposed Project may impact rare plant species.

Specific impact: Project activities will result in loss of suitable habitat for alkali mariposa lily.

Why impact would occur: The BRA identifies marginal habitat for alkali mariposa lily within the Project site. The MND acknowledges that development of the site through Project activities may remove habitat for this species, and mitigation measures are required.

To offset Project-related impacts to alkali mariposa lily, the MND proposes Mitigation Measure 3. Mitigation Measure 3 requires the Project proponent to calculate the total acreage of

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alkali mariposa lily and any other special status plant species present, and the applicant shall be required to pay \$2,405/acre for these areas. The funds shall be placed into a City of Lancaster-designated account and utilized for the acquisition of conservation habitat within the Antelope Valley. However, the mitigation measure does not disclose pertinent information such as potential locations of mitigation land or a timeframe of when the funds would be utilized to purchase mitigation land. As currently written, Mitigation Measure 3 does not commit to acquiring land that would adequately offset the direct loss of rare plants, nor does it adopt specific performance standards and actions pertaining to management of mitigation land. Without sufficient information, Mitigation Measure 3 is considered deferred mitigation [CEQA Guidelines, § 15126.4(a)(1)(B)].

Furthermore, CDFW has ongoing concerns that a blanket fee of \$2,405/acre may not cover all costs associated with land acquisition and management of mitigation land. Current land value costs in the Antelope Valley have increased throughout the years and a fee of \$2,405/acre may be less than the cost of acquisition, thus resulting in mitigation that is less than a 1:1 mitigation ratio. Moreover, Mitigation Measure 3 does not account for the funding necessary to permanently protect mitigation land through a conservation easement, conduct management activities by a qualified land management entity, and provide an endowment that would ensure adaptive management of the mitigation lands in-perpetuity. Without sufficient funding for acquisition and management of mitigation land, the Project would not be able to fulfill its compensatory mitigation and would continue to have a significant adverse impact on alkali mariposa lily.

Evidence impact would be significant: Impacts on rare flora could be considered a significant effect on the environment. Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened. Most of the plants that are ranked 1B have declined significantly over the last century. The additional threat rank of 0.1 indicates a species with over 80 percent of its occurrences threatened in California. The additional threat rank of 0.2 indicates a species with 20 to 80 percent of its occurrences threatened (CNPS 2024). Impacts to CRPR 1B plant species and their habitat meet the definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Some CRPR 3 and 4 species meet the definitions of endangered, rare, or threatened under CEQA. Impacts to CRPR 1B plant species and their habitat may result in a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant

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community and substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065).

Insufficient mitigation may result in unmitigated temporal or permanent impacts to a rare plant species. Subsequently, the Project would continue 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 by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #1: Mitigation Measure 3 – CDFW strongly recommends the City revise Mitigation Measure 3 by incorporating the underlined language and removing the language with strikethrough:

Prior to the issuance of any construction related permits, the Project proponent shall provide compensatory mitigation to offset the Project's impact on alkali mariposa lily at no less than 2:1. The total habitat acreage within the mitigation land shall be no less than 2:1. The Project proponent shall acquire CDFW approved mitigation land that has presence of alkali mariposa lily and is located in the same watershed as the Project site. The mitigation land shall also provide equivalent or greater habitat value than that of the Project site. The Project proponent shall protect replacement habitat in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094. Recordation of the conservation easement shall occur prior to commencement of Project activities. An appropriate endowment shall also be provided for the long-term monitoring and management of mitigation lands.

~~applicant shall retain a biologist to map the location of alkali mariposa lily habitat on the project site based on the previously conducted biological survey or focused springtime survey for the species. The biologist's report shall include the total acreage of alkali mariposa lily and any other special status plant species present and the applicant shall be required to pay \$2,405/acre for these areas. The funds shall be placed into a City of Lancaster-~~

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~~designated account and utilized for the acquisition of conservation habitat within the Antelope Valley.~~

Mitigation Measure #2: Habitat Management and Monitoring Plan – The Project proponent shall retain a certified botanist to draft a Habitat Management and Monitoring Plan (HMMP) and submit it to the City and CDFW for review and approval prior to Project activities. The HMMP shall outline initial and long-term management and maintenance activities that would occur on mitigation lands. The HMMP shall provide measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Maintenance activities outlined in the HMMP shall include measures pertaining to control of exotic vegetation, irrigation schedule, and protection from future maintenance activities (i.e., fuel modification).

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, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency 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 a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

Landscaping. The MND identifies landscaping in the Project's list of activities. CDFW recommends the Project proponent 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. Accordingly, CDFW recommends the City restrict use of any species, particularly 'Moderate' or 'High' listed by the California Invasive Plant Council ³(Cal-IPC 2024). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

³ [The Cal-IPC Inventory – California Invasive Plant Council](#)

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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 website](#)⁴ 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 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 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 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 [California Natural Diversity Database](#)

⁵ [Natural Communities — Submitting Information](#)

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Questions regarding this letter or further coordination should be directed to Lyle Enriquez⁶, Environmental Scientist.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

cc: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Steve Gibson, Senior Environmental Scientist (Supervisor)
Cindy Hailey, Staff Services Analyst

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

REFERENCES

California Fish and Game Commission. 2005. *Miscellaneous Policies*. Retrieved from
<https://fgc.ca.gov/About/Policies/Miscellaneous>

⁶ Lyle.Enriquez@wildlife.ca.gov

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ATTACHMENTS

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: Mitigation Measure 3 – CDFW strongly recommends the City revise Mitigation Measure 3 by incorporating the underlined language and removing the language with strikethrough: Prior to the issuance of any construction related permits, the Project proponent shall provide compensatory mitigation to offset the Project's impact on alkali mariposa lily at no less than 2:1. The total habitat acreage within the mitigation land shall be no less than 2:1. The Project proponent shall acquire CDFW approved mitigation land that has presence of alkali mariposa lily and is located in the same watershed as the Project site. The mitigation land shall also provide equivalent or greater habitat value than that of the Project site. The Project proponent shall protect replacement habitat in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094. Recordation of the conservation easement shall occur prior to commencement of Project activities. An appropriate endowment shall also be provided for the long-term monitoring and management of mitigation lands. ~~applicant shall retain a biologist to map the location of alkali mariposa lily habitat on the project site based on the previously conducted biological survey or focused springtime survey for the species. The biologist's report shall include the total acreage of alkali mariposa lily and any other special status plant species present and the applicant shall be required to pay \$2,405/acre for these areas. The funds shall be placed into a City of Lancaster designated account and~~	Prior to Project Initiation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
~~utilized for the acquisition of conservation habitat within the Antelope Valley.~~		
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Mitigation Measure	Timing	Responsible Party
Council ⁷ (Cal-IPC 2024). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure		

⁷ [The Cal-IPC Inventory – California Invasive Plant Council](#)