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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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October 28, 2026

Michelle Fleishman
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Subject: Mitigated Negative Declaration for the Calgrove Self Storage Project, SCH No. 2026091051, Los Angeles County, CA

Dear Michelle Fleishman:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the Los Angeles County Department of Regional Planning (County) for the Calgrove Self Storage 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 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,

[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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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.

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[2] 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: Los Angeles County Department of Regional Planning (County)

Objective: The objective of the Project is to build a 4-story self-storage facility that would provide a total of 596 storage units as well as offices and an on-site manager's residence. The Project site is 5.26 acres, and the total floor area of the proposed Project would be approximately 94,668 square feet (sf). Project activities such as demolition of all existing facilities, a single-family residence, corresponding underground septic system, and accessory buildings have already been completed. Remaining Project activities would primarily include site preparation, such as remaining vegetation removal, grading, building construction, paving and landscaping, and application of exterior and interior coatings. Approximately 1,500 cubic yards (cy) of cut grading, 4,800 cy of fill grading, 5,400 cy of over-excavation, and 4,300 cy of soil import would be involved for the grading stage. The staging area is proposed to be situated in areas the applicant describes as previously disturbed.

Location: The Project site is located along the northern side of the Santa Susana Mountains, at 24000 The Old Road on Assessor Parcel Number [APN] 2826-023-026 in the Newhall community of unincorporated Los Angeles County. The site is west-southwest of the I-5 freeway and near the city of Santa Clarita. The Project site is abutted by The Old Road to the

[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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southwest and a 36-foot-wide flood-control channel to the northeast. The nearest cross streets are Towsley Canyon Road to the northwest and Saugus to the Sea Road to the southeast.

Timeframe: Previously completed Project activities commenced in 2025 and ceased in early 2026. Additional proposed Project activities are planned to commence in November 2026 and end in December 2027.

Biological Setting: The Project site is in a rural, low-density community setting and previously had a single-family residence and accessory building. Along with the areas impacted by development activities, the site supports an on-site drainage and a primarily native woodland, some of which is along the drainage. Nearby open space areas include Towsley Canyon Park, Rivendale Park and Open Space, Ed Davis Park in Towsley Canyon, Santa Clarita Woodlands Park, Weldon Canyon Open Space, and Gateway Ranch Open Space. The Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA) supports oak woodland habitat and is located less than 150 feet from the proposed Project site.

In November 2022 and July 2024, certified arborist Tree Care Consulting conducted surveys of on-site ordinance-size oak trees and evaluated the site as oak tree woodland, pursuant to the Los Angeles County Oak Woodlands Conservation Management Plan (hereafter "OWCMP"; LACOWHCSA 2011). This evaluation is documented in Appendix A of the MND (Oak Tree and Oak Woodlands Report, hereafter "Oak Report"). One of the original 18 oaks was removed by an unknown party in 2024, and an additional two mature oak trees were removed during demolition of the existing residence. An oak tree permit for the Project has not yet been obtained.

Psomas Consulting conducted a biological site survey in April 2026, after the previously completed Project activities. The associated Biological Constraint Analysis (BCA, included as Appendix C of the MND) does not explicitly map habitat areas and, subsequently, impact calculations. The BCA does describe scattered native trees including coast live oak (*Quercus agrifolia*) and California black walnut (*Juglans californica*; hereafter "walnut") on-site, at least some of which CDFW believes to be California black walnut (*Juglans californica*) – coast live oak (*Quercus agrifolia*) woodland association (hereafter "Walnut – Oak Woodland Association"), an S3 Sensitive Natural Community. The Oak Report describes moderately degraded oak tree woodland; in contrast, the BCA reports that the oak woodland onsite is "severely degraded." However, the BCA survey occurred after demolition-related site activities, including removal of some oaks, had concluded, making the Oak Report the best source of pre-Project activity baselines, at least for oaks. The BCA did not include a floral or faunal compendium for species observed on site or in temporary or fuel modification impact

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zones, nor were any wildlife observations included. However, California sagebrush (*Artemisia californica*) occurs within the Project site, according to the BCA, and riparian vegetation is mentioned in the MND as occurring somewhere at the north end of the property. Encroachments to an additional 8 oak trees, including two heritage trees (one of which is a valley oak (*Quercus lobata*)), are also proposed. Potential encroachments to walnuts besides the ones slated to be removed are not included in the MND. Several oaks to be removed by the Project are or were situated below the edge of the bank of the on-site drainage channel. Overall, the MND concluded that no special status species besides walnuts would occur within the Project site.

Mitigation measures for biological resources in the MND consist of MM (Mitigation Measure) BIO-1, which calls for general pre-construction nesting bird surveys. MM BIO-2 calls for 2:1 replacement of the seven oak trees to be removed or was already removed. No mitigation for area-based loss of oak woodland is currently proposed. No explicit mitigation for encroachments to the remaining mature oaks, loss of walnuts (California Rare Plant Rank (CRPR) 4.2), or loss of State Rank (SR) 3 Walnut – Oak Woodland Association habitat was included.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County 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 are also included to improve the document.

COMMENT # 1: Inadequate Biological Baseline

Issue: Sufficient detail is needed to allow adequate assessment of these impacts under CEQA.

Specific impact: The MND is based on insufficient biological reports. Therefore, the MND's conclusions may result in significant impacts to fish and wildlife resources and the habitats upon which they depend.

Why impact would occur: Much of the biological assessment in the MND is based on speculation and lack rigorous scientific information on potential impacts. Notably, the survey for the BCA was not conducted until unpermitted site activities were already conducted, including demolition of the two existing residential structures and removal of at least two protected oak trees that were damaged by demolition-related activities. A biological analysis of the Project site after the completed Project activities may not produce the same

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analysis of vegetation communities, in terms of acreage and composition, as it would have prior to these activities. The MND and Oak Report include opposing conclusions regarding the biological resources associated with the Project; only the Oak Report was written before Project activities commenced. If significance findings are based on the BCA and thus site conditions after major vegetation removal and soil compaction from the demolition activity, then the environmental baseline would be inaccurate, resulting in incorrect findings under CEQA with unmitigated significant impacts.

Conservation Status. Per the BCA, "*California black walnut is included on the California Native Plant Society Inventory with a California Rare Plant Rank (CRPR) of 4, indicating limited distribution and relatively low conservation concern*." However, CNPS does not state that CRPR 4 plants are of low conservation concern but rather that they have limited distributions, that their status should be monitored regularly, and that evaluation for impact significance under CEQA is strongly recommended for CRPR 4 species. Furthermore, the walnut conservation status was not fully disclosed, as its complete rank is CRPR 4.2, with the ".2" denoting a Threat Rank of "moderately threatened". Thus, species such as walnut with a 4.2 designation have limited distributions *and* are moderately threatened in California, which differs from what was reported in the BCA. Furthermore, the species is listed as "Near Threatened" on the IUCN Red List (Stritch & Barstow 2019), highlighting its conservation importance, particularly considering that the species is endemic only to coastal southern California in fragmented patches.

Lack of floral compendium. The BCA mentions a few dominant nonnative plant species but lacks any sort of plant list/floral compendium. The only native understory species mentioned (California sagebrush) cannot be assumed to be the isolated instance of a native understory species without a complete plant list. Furthermore, adjacent areas that could be impacted by temporary staging or fuel modification zones do not appear to have been surveyed because other sections in the MND mention riparian habitat in the northern portion of the site, but no riparian species are described in the BCA. Certain special status plant species can persist despite being interspersed with nonnative species. Impacts to special status species, if present, could occur in the absence of an inventory of what is present both in the Project footprint and short-term and long-term impact zones.

Lack of faunal compendium. A list of observed wildlife species was not included in the BCA, which is important both for completeness to provide a biological baseline and to demonstrate that surveys adequately inventoried the Project vicinity for the presence of special status wildlife species. Per the BCA, "*No special-status wildlife species or suitable habitat for such species were observed within the Project Area during the field survey. The site is highly disturbed and lacks the vegetation structure, habitat features, and connectivity*

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necessary to support special-status wildlife species. The Project Area is separated from nearby open space areas by Interstate 5, The Old Road, and surrounding development, which limits wildlife movement and reduces the potential for use by special-status species. As such, special-status wildlife species are not expected to occur within the Project Area." CDFW is concerned about the accuracy of statements given that extensive open space areas occur nearby, including the Santa Susana Mountains/Simi Hills SEA that is directly across the road from the Project. The BCA's determination about potential special status species does not appear to consider use by volant (flying) species that would not be dependent on an intact native understory. Additionally, many birds use wooded riparian corridors, such as what occurs on the site, for foraging purposes, even in the absence of large, adjacent open areas.

Furthermore, CDFW deems a lack of any wildlife being present during the site survey unlikely, given the presence of a mature oak woodland. Oak tree habitats are particularly associated with native bird richness and abundance (Motroni et al. 1991). Even relatively isolated oak trees maintain frequency of use by birds; indeed, the single strongest factor in determining bird frequency of use is oak tree size, not contiguity (DeMars et al. 2010). Numerous large oaks were present on-site at the time of the biological survey, suggesting that explicit surveys for birds or other wildlife were not conducted, or at least were not disclosed with a standard faunal compendium and survey methods. The Project could impact special status wildlife species because the BCA (and thus MND) does not describe faunal species observed, suggesting that surveys were only cursory at best.

Omitted conclusions from the Oak Report. The oak woodland was assessed in the Oak Report, stating that the Project "*will have a high impact on the existing defined oak woodland because it will result in a loss of natural habitat and the fragmentation of it. Currently, the sphere of influence for each oak tree was encroached and the understory was removed. The Project will encroach these spheres of influence (see oak tree map encroachment zones) and drastically reduce the opportunity for regeneration. The contiguity of the defined, limited oak woodland will be greatly reduced*." The Oak Report also states that the Project "*will have a significant impact on the existing moderately degraded oak woodland. Some of the impacts include loss of a significant area of oak woodland, the loss of understory species or, more precisely, the loss of areas that are potential sites for understory to become established, and changes to the existing environment that will reduce the chance for oak tree regeneration*." Nonetheless, the MND omits the Oak Report's significance conclusions and instead relies on the BCA for biological significance determinations because it was more recent. Crucially, only the Oak Report was based on an accurate baseline, i.e., pre-demolition conditions. Thus, the MND's

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determination that impacts to oak woodlands are less than significant is inaccurate. The Oak Report appears to be the only reliable source for oak woodland impact determinations.

Inaccurate habitat descriptions. The BCA also includes ecologically incorrect and/or legally unsupported statements. The BCA's assessment of the oak woodland as "severely degraded," as opposed to the Oak Report of it being moderately degraded, appears to have led to the less-than-significant determination for impacts to oak woodlands. The primary reasons stated for the impact not being significant were (1) degradation status, and (2) that it lacked key characteristics of a functioning oak woodland community, including contiguous canopy structure, native understory, and evidence of natural recruitment. However, the BCA survey was conducted after major site preparation activities had already commenced, which would have degraded the understory further, compacted soil, and directly resulted in the loss of two mature oaks, including one approximately 96 years old, and another estimated at 80 years old, based on standard arborist calculations of oak age (International Society of Arboriculture [ISA] 2018).

Additionally, CDFW does not assess habitat loss under CEQA based on degradation status. If the habitat was too poorly degraded, it would not meet the definition of the relevant alliance or association. Sensitive natural communities, or a special-status plant like the walnut, do not lose their ecological status or CEQA protection because non-native weeds are present or their environment has been degraded by human activities. Degraded habitats frequently serve as important ecological corridors, seed banks, or future restoration zones. Oak trees are strongly associated with native wildlife species richness and abundance (Motroni et al. 1991). Even with understories degraded by human activities, large oak trees act as keystone habitat structures for wildlife species (DeMars et al. 2010).

Furthermore, the statement that the oak woodland lacks the characteristics of a functioning oak community because it does not have contiguous canopy cover directly conflicts with both California statutory law and accepted scientific definitions. The OWCMP defines an oak woodland by a baseline canopy cover of greater than 10 percent, not contiguity. Furthermore, the Manual of California Vegetation (MCV), defines woodlands as open stands with 25% to 60% cover, which distinguishes them from closed-canopy (i.e., contiguous-canopy) forests.

Additionally, the BCA and thus MND state a lack of recruitment as evidence of the on-site oak woodland being severely degraded and nonfunctional. However, per the Oak Report, "*Some regeneration of this oak woodland has occurred shown by the side range maturity of the oak trees on the site; the oaks range from 10 to 20 years old to 50 or more years old*" and "*Six young oak trees, part of this oak tree stand, are located near the flood control channel*."

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Younger oak trees would not have been measured for the oak tree permit preparation, but their baseline documentation in the Oak Report, prior to the 2025-2026 demolition activities, is evidence that the woodland was indeed only moderately as opposed to severely degraded. Similarly, the discrepancy between the BCA and Oak Report suggests that understory was removed along with the two mature oaks during the pre-permitting site disturbance activities, which would have removed the evidence of oak recruitment.

Conclusion. Determining the environmental baseline, including species lists, habitat mapping, and accurate descriptions of on-site sensitive biological resources, is necessary to determine significance levels under CEQA. Baselines must, whenever possible, be based on conditions prior to the commencement of destructive Project activities. Here, the baseline for oak woodland habitat area to be impacted on-site may need to be based solely on the pre-demolition oak tree report, which deemed it only moderately degraded. Furthermore, degradation status, understory, cover contiguity, and recruitment are not defining requirements for oak woodland impact significance for CDFW under CEQA. However, if strictly adhering to the guidelines of the OWCMP, the proposed impacts to moderately degraded oak woodland habitat would be considered significant without mitigation because the impacts do not meet the definition of "low" (OWCMP, Table 8, page 75). The OWCMP also calls for no net loss of oak woodland habitat, which further demonstrates the need to accurately describe the habitat and re-evaluate significance levels.

Evidence impact may be significant: CEQA Guidelines section 15125(a) requires a description of the physical environmental conditions in the Project vicinity, which may serve as the baseline for determining whether the Project may cause a potentially significant impact. The purpose of establishing a baseline is for determining impact significance and depicting near-term and long-term impacts. When existing conditions have changed since environmental analyses commenced, these baselines may be based on historical conditions in order to provide the most accurate picture practically possible of the Project's impacts.

Consistent with CEQA Guidelines section 15125(c), an understanding of the regional biological setting is essential for evaluating environmental impacts. Environmental documents prepared under CEQA must demonstrate that the significant effects of the proposed Project have been thoroughly identified, investigated, and disclosed, ensuring that the Project's impacts are considered within the broader environmental context. This information is necessary to allow CDFW to comment on 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) and/or habitat type (CEQA Guidelines, § 15086 and 15386(a)). This section also states that, when investigating the environmental setting, emphasis should particularly be placed on environmental resources that are rare or unique

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to the region that could be affected by the Project. Relevant species and habitats unique to coastal southern California and with limited remaining habitat in Los Angeles County would include the walnut (IUCN Near-Threatened; CRPR 4.2) and Walnut – Oak Woodland Association, as well as oak woodland habitat in general. Field verification for the presence or absence of these and other sensitive biological resources, and their locations, is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)).

Pursuant to Fish and Game Code Section 1361(h) and Public Resources Code Section 21083.4, an oak woodland is legally defined by a baseline canopy cover of greater than 10 percent.

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #1 (MM) BIO-3: Updated Biological Assessment Surveys and Impact Analyses.

a. Desktop review for potential presence of sensitive biological resources: Conduct a standard 9-quadrangle review in the California Natural Diversity Database (CNDDB) for sensitive habitats and special status species that could occur in the Project vicinity. In the absence of focused surveys for special status species or sensitive habitats that could be impacted by short- or long-term Project activities, presence of these resources should be assumed. To address impacts to these resources, if present, minimization and avoidance measures for the relevant species and habitats shall be adopted.

b. Habitat surveys and mapping: Prior to construction, floristic alliance and/or association-based mapping and vegetation impact assessments shall be conducted for the Project site and within adjacent areas. The Manual of California Vegetation (MCV)[3], second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment, and MCV alliance/association community names shall be used. *Quercus* habitats shall be identified to the association level. Adjoining habitat areas shall be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off site, including those due to future fuel modification zones.

c. Plant and wildlife species surveys for floral and faunal compendium: To establish the biological baseline, inventory surveys for plant and animal (including bird) species on the Project site shall be conducted prior to construction, including in areas that could be

[3] https://vegetation.cnps.org/

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subject to temporary disturbance or fuel modification zones. Special attention shall be given to native species present, even if not dominant in a particular area.

d. Sensitive plant and plant community surveys: Prior to construction, a thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[4] shall be conducted. Botanical field surveys shall be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project, such as from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys shall be conducted at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting.

e. Walnut surveys: The certified Project arborists shall survey, measure, and map out the driplines of the on-site California black walnut trees (status CRPR 4.2) so that they may be included in impact assessments. Any walnuts with potential encroachments into their protection zones, which extend beyond the dripline, shall also be measured and mapped the arborists so that they can be included in the assessment of impacts to Walnut – Oak Woodland Association (S3) habitat.

Recommendation #1: Reevaluation of the MND. After completing the updated biological assessment surveys and arboricultural surveys of the walnuts, the County, with support of experienced, qualified biologists and arborists, should evaluate the assessment, quantify and qualify expected impacts to biological resources based on pre-demolition conditions as feasible, reevaluate the MND to determine whether the assessment identifies new or more severe environmental impacts, and update mitigation/minimization/replacement plans accordingly to ensure the significance determinations are based on adequate biological baselines. Lists should be provided for the results of: the sensitive habitats and special status species potentially occurring in the Project vicinity, plant surveys, wildlife surveys, and focused surveys for special status species, as relevant. Inaccurate or unsupported information and determinations should also be edited to accurately reflect oak tree woodland definitions under CEQA, characteristics of the on-site woodland stand as it existed prior to commencement of demolition-related activities (i.e., based on the oak tree report), the correct CRPR and IUCN rank status of the walnuts, and a clarification of riparian habitat presence within the Project footprint or fuel modification zone, and any other potential sensitive biological resources that could be impacted by the Project.

[4] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

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COMMENT # 2: Insufficient Mitigation for Native Habitats and Special Status Plants.

Issue: Sensitive plants and habitats will be impacted by the Project.

Specific impact: Significant and adverse impact may occur if key habitats and native tree impacts are not fully addressed through appropriate mitigation measures or compensatory mitigation.

Why impact would occur: Mitigation for the area-based loss of oak woodland habitat is not explicitly addressed in the MND. The individual oak tree replacement mitigation measure is neither specific nor fully enforceable through permit conditions or agreements, consisting merely of deferred mitigation as currently written. Proposed mitigation for the loss of seven mature oak trees, including some that are or were very large (e.g., a 5-trunk oak totaling 57 inches diameter at breast height), and encroachment on an additional eight, including heritage trees, consists of only replacement planting at a 2:1 ratio for the seven removals. This is insufficient to address the temporal loss of the canopies and microhabitats provided by these mature trees for wildlife species or the loss of oak woodland habitat as a whole. Mitigation for loss of canopy area due to pruning is also not accounted for, and the various unpermitted impacts to oaks thus far (e.g., the aforementioned removals, and unsupervised pruning documented in the Oak Report) suggest that overly conservative mitigation measures may not address the entire impacts of the Project. Impacts to other native trees, including walnut trees and the Walnut – Oak Woodland Association, are not addressed with the proposed mitigation. Impacts to other sensitive biological resources potentially on site are currently unknown because habitats were not mapped, and species were not inventoried during surveys. As such, mitigation is lacking for reducing impacts to other resources, if present, to a level of less than significant.

Oaks are crucial to the ecosystem and provide habitat for many native wildlife species. Therefore, removal of these trees would result in loss of habitat function. For example, presence of coast live oak is a strong predictor of foraging native bird abundance in Los Angeles County (Khanna-Dang & Wood 2026). Alongside loss of habitat function, oaks also provide important ecological services, such as carbon sequestration, protecting soils from erosion and landslides, and regulating water flow within watersheds. Oak species are very slow growing; some species may take between 30 to 50 years to reach reproductive maturity (Hickman 1993). Although the Project proposes planting of new oak trees, it does not factor in the temporal loss of the ecological services and habitat that would result from removal of mature oak trees.

CDFW generally recommends that a much higher ratio for oaks to be planted, both because of the temporal loss of habitat and because the life history of the species,

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predation, and invasive pests tend to eliminate many young trees before they can mature, after mitigation monitoring has concluded. MM BIO-2 does not specify success criteria, monitoring protocols, or management details to ensure the success of planted oak trees. Furthermore, MM BIO-2 states that the County Engineering Department would identify sufficient measure(s) from the recommendations made in the Oak Tree and Oak Woodlands Report (Appendix A) to meet the County's regulatory requirements for issuance of a Tree Removal Permit. However, the standards for the tree removal permit are minimal and would not fulfill the standards for the loss of oak woodlands under CEQA, such that the proposed planting of 14 oak saplings would not mitigate for the loss of seven mature oak trees with canopies spreading up to 59 feet across (e.g., oak #15, which is approximately 107 years old per standard coast live oak growth metrics [ISA 2018]) and totaling several thousands of square feet in oak canopy loss, not including canopies of younger oaks noted in the Oak Report that were not measured. Mitigation for encroachments into the protected zones and canopies of eight additional oaks was also not included in the MND and would contribute to a net loss of oak woodland canopy. The proposed planting of individual trees also does not replace the loss of the oak woodland habitat as a whole. The OWCMP (page 49) specifies that oak woodland area shall be calculated as canopy area times 10, to account for the non-contiguous spacing of this habitat type. Per the OWCMP, page 112, on-site replacement plantings for removal of oak woodland canopy shall only be considered as a last resort and must replace lost canopy area at a ratio of at least 2:1. The OWCMP also includes CEQA guidance that tree planting alone shall provide no more than 50% of the mitigation because oak seedlings and saplings can take 100 years to replicate the habitat complexity and ecosystem services of mature oaks.

Furthermore, information provided in the MND provides substantial evidence that the specific habitat type association on the Project site is Walnut – Oak Woodland Association, which is an S3 Sensitive Natural Community. Even if degraded, these habitats maintain ecological importance and require mitigation. As such, mitigation rates would need to be higher than the standard oak woodland rates to reduce impacts to less than significant.

Walnuts are also a highly valuable native tree species on their own, being endemic only to coastal southern California in fragmented populations. Although it was once more widespread, this unique tree species has experienced significant declines over time (Esser 1993). In addition to being listed as a special status species by the California Native Plant Society (CRPR rank 4.2), the walnut is listed as "Near Threatened" on the global IUCN Red List (Stritch & Barstow 2019). Even at an individual tree level, the walnut is important to native wildlife and supports high foraging bird species richness (Khanna-Dang & Wood 2026). Both the loss of walnuts and oak woodland canopy constitute edge effects that would be significant without mitigation, particularly because of the site being adjacent to an SEA.

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Evidence impact would be significant:

In addition to the OWCMP standards, oak trees and woodlands are additionally protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372), CEQA Guidelines, Appendix G, Section IV(e) [oak woodlands], and Public Resources Code section 21083.4 due to the historic and ongoing loss of these important resources. Measures would also be considered deferred mitigation in the absence of clear benchmarks or details; specifically, mitigation measures must be feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6).

Loss of walnut individuals and habitat types of this special status species would be significant without mitigation, per CEQA Guidelines, Appendix G, Section IV(a) [special status species] and IV(d) [sensitive natural community). Pursuant to CEQA Guidelines, Section 15380(b(2(A))), a species is considered "Rare" if, although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens, which applies to this species because of its rarity and moderately threatened status (CRPR 4.2 rank) and IUCN-recognized status as Near-Threatened due to its limited rarity and declines. Pursuant to CEQA Guidelines, § 15380(d), a species not listed as endangered, rare or threatened shall nevertheless be considered to be endangered, rare or threatened under CEQA if it meets the criteria in CEQA Guidelines, § 15380(b).

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #2: BIO-2: Oak Tree Removal Mitigation. The County shall revise MM BIO-2 to incorporate the underlined language and omit language in strikethrough:

***MM BIO*-2: Oak Tree, Walnut, and Oak-Walnut Woodland Removal Mitigation.** In consultation with the County Permitting Department, ~~the County Engineering Department would identify sufficient measure(s) from the recommendations made in the Oak Tree and Oak Woodlands Report (Appendix A)~~ the following mitigation measures shall be implemented to meet the County's regulatory requirements for issuance of a Tree Removal Permit and to reduce impacts under CEQA to both individual trees (including the special status California black walnuts) and area-based losses of Walnut – Oak Woodland Association Sensitive Natural Community impacts to less than significant:~~.~~

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a) Individual Trees. For both ordinance-size oak trees and walnuts impacted by the Project, t~~T~~ree removal shall require~~s~~ a minimum of 10:1 ~~2:1~~ replacement ratio ~~of trees~~ to account for attrition after cessation of monitoring, totaling a minimum of at least ~~14~~ 70 oak and 20 walnut replacements. If planting within the 2.5-acre area at the northern end of the site, a certified arborist shall be consulted to examine the hydrology, soil compaction, and existing conditions to assess the long-term likelihood of success if planting there. Planting and maintenance shall not result in the removal of or damage to existing native vegetation. All replacement trees shall consist of a minimum 15-gallon container size and be grown exclusively from locally collected native seed or cutting stock sourced within the Santa Clarita Valley watershed to preserve local genetic integrity.

b) Oak-Walnut Woodland. Pursuant to PRC section 21083.4 under CEQA, tree planting alone shall provide no more than 50% of the mitigation for loss of oak woodland because oak seedlings and saplings can take 100 years to replicate the habitat complexity and ecosystem services of mature oaks. If planting as one-half of the mitigation, the remainder of the mitigation shall entail either purchase of a permanent offsite conservation easement supporting Walnut – Oak Woodland Association or contribute in-lieu funds to the Oak Woodlands Conservation Fund or Los Angeles County Oak Forests Special Fund. These off-site mitigation options must be within Los Angeles County.

   Calculations for Walnut – Oak Woodland Association loss shall be based on the canopy measurements of all impacted oak and walnut trees multiplied by a factor of 10, per the guidelines in the OWCMP. Canopy measurements of the impacted oaks are detailed in the oak report (MND: Appendix A) and may be used for the calculations. If the walnuts on-site are never surveyed to provide canopy measurements, the average canopy area of the removed oaks (456.5 sf) may be substituted for each of the walnuts. Once the total woodland-canopy area has been calculated, the standard minimum mitigation ratio for loss of oak woodland in Los Angeles County shall be increased from 2:1 to 3:1 for this Project to account for the Walnut – Oak Woodland Association being a Sensitive Natural Community, removal of non-ordinance-size oaks, and encroachments on almost all of the retained oaks. Based on the information provided in the draft MND, and assuming no mortality of retained trees due to encroachments, this area for offsite permanent conservation or in-lieu funding should equal at least 1.57 acres of mature Walnut – Oak Woodland Association woodland.

c) Habitat Restoration Plan (HRP) to mitigate for the removal of Walnut – Oak Woodland Association. The plan shall be provided to CDFW for review prior to the implementation. At a minimum, the plan shall include:

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- Details of the off-site compensatory mitigation method selected for the 50% non-planting requirement
- A description of and map of the receiver site(s) for new plantings, installation methods, monitoring procedures, plant spacing, and timeline
- Maintenance requirements that ensure establishment of the newly established oaks and walnuts
- Success criteria for a minimum 7-year monitoring period to ensure that the oaks and walnuts are reestablished successfully at the ratios provided
- Adaptive management strategies and corrective measures should survival percentages not meet the replacement ratio
- Annual reports provided to CDFW

d) Construction Tree Protection Best Management Practices. Prior to grading permit issuance, the County shall verify that all construction BMPs detailed in MND Appendix A: Oak Tree and Oak Woodlands Report (prepared by Tree Care Consulting, revised December 30, 2025), Pages 5-8: Sections *7(F) – Tree, 7(G) – Pruning, 7(H) – Grading Near Protected Trees, 7(I) – Protective Fencing, 7(J) – Grading, and 7(K) – Other protective measures* are printed directly on the final engineering and grading plans, and shall be enforced as mandatory conditions for the duration of construction.

~~Per the tree report (Appendix A) replacement trees could be planted onsite, likely in a 2.5-acre area on the north side of property or in the riparian area that is within the Caltrans drainage easement but outside of the drainage area. Other options could include restoration at an offsite degraded oak woodland area in the vicinity or payment of an in-lieu fee that would go to a special fund for restoring oak trees at other locations.~~

ADDITIONAL COMMENTS

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include the mitigation measures 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 County 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 (MMRP; Attachment A).

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Pre-construction Nesting Bird Surveys. To avoid impacts on nesting birds, CDFW requests the County revise Mitigation Measure BIO-1 to incorporate the underlined language and omit the language in strikethrough:

MM BIO-1: If ~~vegetation removal~~ construction activity, including clearing of vegetation, occurs during the nesting season (generally February 1 through ~~August 31~~ September 15; as early as January 1 for some raptors), a qualified biologist with experience in conducting breeding bird surveys ("Qualified Biologist") shall conduct pre-construction nesting bird surveys on-site and in a 500-foot radius within three (3) days prior to work ~~will occur~~ to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 300-foot buffer for all native avian species and a 500-foot buffer for raptors and species that are listed or special status if discovered in pre-construction surveys or otherwise noted during construction activities. The nest buffer may be reduced to 100 feet for urban-habituated native species that are currently abundant and not experiencing declines (namely, house finch, Anna's hummingbird, and black phoebe). Non-disturbance buffers to avoid a nest site shall be established by the Qualified Biologist in the field with flagging and stakes or construction fencing. No Project activities shall occur within the fenced nest zone until the Qualified Biologist determines that the young have fledged, are no longer being fed by the parents, have left the nest, and there is no evidence of a second attempt at nesting.

Lake or Streambed Alteration (LSA) Agreement. Based on the Oak Report photos, multiple impacted oaks are, or were, located within the drainage and below the top of the bank. The removal or alteration of this vegetation will require a Notification of Lake or Streambed Alteration (LSA) pursuant to Fish and Game Code Section 1602. Based on this LSA notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. A Notification package for a LSAA may be obtained by accessing CDFW's Lake and Streambed Alteration Program website (Lake and Streambed Alteration Program).

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

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during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[5] 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[6].

The County 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 County 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 County in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the County 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 Laurel Peelle[7], Environmental Scientist.

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[5] https://wildlife.ca.gov/Data/CNDDB
[6] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[7] Phone: 310-382-4266; Email: Laurel.Peelle@wildlife.ca.gov

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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

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Erika Cleugh, Senior Environmental Scientist (Supervisor)
Laurel Peelle, Environmental Scientist

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

REFERENCES

DeMars, C. A., Rosenberg, D. K., & Fontaine, J. B. (2010). Multi-scale factors affecting bird use of isolated remnant oak trees in agro-ecosystems. *Biological Conservation*, *143*(6), 1485-1492.

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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: MM BIO-3: Updated Biological Assessment Surveys and Impact Analyses. a. Desktop review for potential presence of sensitive biological resources: Conduct a standard 9-quadrangle review in the California Natural Diversity Database (CNDDB) for sensitive habitats and special status species that could occur in the Project vicinity. In the absence of focused surveys for special status species or sensitive habitats that could be impacted by short- or long-term Project activities, presence of these resources should be assumed. To address impacts to these resources, if present, minimization and avoidance measures for the relevant species and habitats shall be adopted. b. Habitat surveys and mapping: Prior to construction, floristic alliance and/or association-based mapping and vegetation impact assessments shall be conducted for the Project site and within adjacent areas. The Manual of California Vegetation (MCV)[8], second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment, and MCV alliance/association community names shall be	Prior to construction activities	

[8] https://vegetation.cnps.org/

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Mitigation Measure	Timing	Responsible Party
used. *Quercus* habitats shall be identified to the association level. Adjoining habitat areas shall be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off site, including those due to future fuel modification zones. c. Plant and wildlife species surveys for floral and faunal compendium: To establish the biological baseline, inventory surveys for plant and animal (including bird) species on the Project site shall be conducted prior to construction, including in areas that could be subject to temporary disturbance or fuel modification zones. Special attention shall be given to native species present, even if not dominant in a particular area. d. Sensitive plant and plant community surveys: Prior to construction, a thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[9] shall be conducted. Botanical field surveys shall be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project, such as from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys shall be conducted at the times of year when plants will be both		

[9] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

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Mitigation Measure	Timing	Responsible Party
evident and identifiable. Usually, this is during flowering or fruiting. Walnut surveys: The certified Project arborists shall survey, measure, and map out the driplines of the on-site California black walnut trees (status CRPR 4.2) so that they may be included in impact assessments. Any walnuts with potential encroachments into their protection zones, which extend beyond the dripline, shall also be measured and mapped the arborists so that they can be included in the assessment of impacts to Walnut – Oak Woodland Association (S3) habitat.		
Recommendation #1: Reevaluation of the MND. After completing the updated biological assessment surveys and arboricultural surveys of the walnuts, the County, with support of experienced, qualified biologists and arborists, should evaluate the assessment, quantify and qualify expected impacts to biological resources based on pre-demolition conditions as feasible, reevaluate the MND to determine whether the assessment identifies new or more severe environmental impacts, and update mitigation/minimization/replacement plans accordingly to ensure the significance determinations are based on adequate biological baselines. Lists should be provided for the results of: the sensitive habitats and special status species potentially occurring in the Project vicinity, plant surveys, wildlife surveys, and focused surveys for special status species, as relevant. Inaccurate or unsupported information and determinations should also be edited to	Prior to construction activities	Lead Agency/ Arborist/Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
accurately reflect oak tree woodland definitions under CEQA, characteristics of the on-site woodland stand as it existed prior to commencement of demolition-related activities (i.e., based on the oak tree report), the correct CRPR and IUCN rank status of the walnuts, and a clarification of riparian habitat presence within the Project footprint or fuel modification zone, and any other potential sensitive biological resources that could be impacted by the Project.		

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Mitigation Measure #2: BIO-2: Oak Tree Removal Mitigation. The County shall revise MM BIO-2 to incorporate the underlined language and omit language in strikethrough: ***MM BIO-2*: Oak Tree, Walnut, and Oak-Walnut Woodland Removal Mitigation.** In consultation with the County Permitting Department, ~~the County Engineering Department would identify sufficient measure(s) from the recommendations made in the Oak Tree and Oak Woodlands Report (Appendix A)~~ the following mitigation measures shall be implemented to meet the County's regulatory requirements for issuance of a Tree Removal Permit and to reduce impacts under CEQA to both individual trees (including the special status California black walnuts) and area-based losses of Walnut – Oak Woodland Association Sensitive Natural Community impacts to less than significant:~~.~~ a) Individual Trees. For both ordinance-size oak trees and walnuts impacted by the Project, t~~T~~ree removal shall require~~s~~ a minimum of 10:1 ~~2:1~~ replacement ratio ~~of trees~~ to account for attrition after cessation of monitoring, totaling a minimum of at least ~~1~~4 70 oak and 20 walnut replacements. If planting within the 2.5-acre area at the northern end of the site, a certified arborist shall be consulted to examine the hydrology, soil compaction, and existing conditions to assess the long-term likelihood of success if planting there. Planting and maintenance shall not result in the removal of or damage to existing native vegetation. All replacement trees shall consist of a minimum 15-gallon container size and be grown exclusively from locally collected native seed or cutting stock sourced	Prior to and during construction	Lead Agency/ Permittee/Arborist

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Mitigation Measure	Timing	Responsible Party
within the Santa Clarita Valley watershed to preserve local genetic integrity. b) Oak-Walnut Woodland. Pursuant to PRC section 21083.4 under CEQA, tree planting alone shall provide no more than 50% of the mitigation for loss of oak woodland because oak seedlings and saplings can take 100 years to replicate the habitat complexity and ecosystem services of mature oaks. If planting as one-half of the mitigation, the remainder of the mitigation shall entail either purchase of a permanent offsite conservation easement supporting Walnut – Oak Woodland Association or contribute in-lieu funds to the Oak Woodlands Conservation Fund or Los Angeles County Oak Forests Special Fund. These off-site mitigation options must be within Los Angeles County. Calculations for Walnut – Oak Woodland Association loss shall be based on the canopy measurements of all impacted oak and walnut trees multiplied by a factor of 10, per the guidelines in the OWCMP. Canopy measurements of the impacted oaks are detailed in the oak report (MND: Appendix A) and may be used for the calculations. If the walnuts on-site are never surveyed to provide canopy measurements, the average canopy area of the removed oaks (456.5 sf) may be substituted for each of the walnuts. Once the total woodland-canopy area has been calculated, the standard minimum mitigation ratio for loss of oak woodland in Los Angeles County shall be increased from 2:1 to 3:1 for this Project to account for the Walnut – Oak Woodland Association being a Sensitive Natural Community, removal of non-ordinance-size oaks, and encroachments on		

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Mitigation Measure	Timing	Responsible Party
almost all of the retained oaks. Based on the information provided in the draft MND, and assuming no mortality of retained trees due to encroachments, this area for offsite permanent conservation or in-lieu funding should equal at least 1.57 acres of mature Walnut – Oak Woodland Association woodland. c) Habitat Restoration Plan (HRP) to mitigate for the removal of Walnut – Oak Woodland Association. The plan shall be provided to CDFW for review prior to the implementation. At a minimum, the plan shall include: o Details of the off-site compensatory mitigation method selected for the 50% non-planting requirement o A description of and map of the receiver site(s) for new plantings, installation methods, monitoring procedures, plant spacing, and timeline o Maintenance requirements that ensure establishment of the newly established oaks and walnuts o Success criteria for a minimum 7-year monitoring period to ensure that the oaks and walnuts are reestablished successfully at the ratios provided o Adaptive management strategies and corrective measures should survival percentages not meet the replacement ratio o Annual reports provided to CDFW		

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Mitigation Measure	Timing	Responsible Party
d) Construction Tree Protection Best Management Practices. Prior to grading permit issuance, the County shall verify that all construction BMPs detailed in MND Appendix A: Oak Tree and Oak Woodlands Report (prepared by Tree Care Consulting, revised December 30, 2025), Pages 5-8: Sections *7(F) – Tree, 7(G) – Pruning, 7(H) – Grading Near Protected Trees, 7(I) – Protective Fencing, 7(J) – Grading, and 7(K) – Other protective measures* are printed directly on the final engineering and grading plans, and shall be enforced as mandatory conditions for the duration of construction. ~~Per the tree report (Appendix A) replacement trees could be planted onsite, likely in a 2.5-acre area on the north side of property or in the riparian area that is within the Caltrans drainage easement but outside of the drainage area. Other options could include restoration at an offsite degraded oak woodland area in the vicinity or payment of an in-lieu fee that would go to a special fund for restoring oak trees at other locations.~~		
Additional Comment: Revise MM BIO-1 - Pre-construction Nesting Bird Surveys. To avoid impacts on nesting birds, CDFW requests the County revise Mitigation Measure BIO-1 to incorporate the underlined language and omit the language in strikethrough: ***MM BIO-1***: If ~~vegetation removal~~ construction activity, including clearing of vegetation, occurs during the nesting season (generally February 1 through ~~August 31~~ September 15; as early as January 1 for some raptors), a qualified biologist with experience in conducting breeding bird surveys ("Qualified Biologist") shall	No less than 3 days prior to any construction activities, including vegetation removal	Lead Agency/ Permittee/Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
conduct pre-construction nesting bird surveys on-site and in a 500-foot radius within three (3) days prior to work ~~will occur~~ to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 300-foot buffer for all native avian species and a 500-foot buffer for raptors and species that are listed or special status if discovered in pre-construction surveys or otherwise noted during construction activities. The nest buffer may be reduced to 100 feet for urban-habituated native species that are currently abundant and not experiencing declines (namely, house finch, Anna's hummingbird, and black phoebe). Non-disturbance buffers to avoid a nest site shall be established by the Qualified Biologist in the field with flagging and stakes or construction fencing. No Project activities shall occur within the fenced nest zone until the Qualified Biologist determines that the young have fledged, are no longer being fed by the parents, have left the nest, and there is no evidence of a second attempt at nesting.		
Additional Comment: Lake or Streambed Alteration (LSA) Agreement. Based on the Oak Report photos, multiple impacted oaks are, or were, located within the drainage and below the top of the bank. The removal or alteration of this vegetation will require a Notification of Lake or Streambed Alteration (LSA) pursuant to Fish and Game Code Section 1602. Based on this LSA notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the	Prior to construction activities	Permittee

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Mitigation Measure	Timing	Responsible Party
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