

ATTACHMENT A

**CHJ, Inc. Responses to
Comments from City of Glendora
(November 12, 2010)**



C.H.J. Incorporated

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November 12, 2010

NJD, Ltd.
3300 East 1st Ave, Suite 510
Denver, CO 80206
Attention: Mr. John Scott, Vice President

Job No. 10389-3

Subject: Response to Comments by City of Glendora
Brasada Project - Geotechnical Investigation (C.H.J., Incorporated 2009)

References: Attached

Dear Mr. Scott:

We have reviewed the letter dated November 2, 2010 from Mr. Jeff Kugel (City of Glendora) addressed to Mr. Larry Stevens of the City of San Dimas (attached). Our response to item 'a' listed under the Geology & Soils subsection is presented below.

The area of the landslide adjacent to proposed Lot 51 described in the comment letter is depicted as geologic unit Qts (talus) rather than Qls (landslide) on the map accompanying the most recent report by Leighton dated June 28, 2000. An earlier (now-revised) map prepared by Leighton that accompanied a report dated September 20, 1999 (Leighton 1999b) depicted a landslide at the location described in the comment letter that has been removed from the current Leighton map. The removal of this landslide designation from the 1999 map by Leighton was apparently based on more accurate data obtained in borehole CB-2 drilled in December 1999 by Leighton and presented in the most recent report by Leighton (2000; discussed in paragraph 3, page 10). The geologic map accompanying the CHJ (2009) report indicates the location of CB-2 and presents mapping of landslide boundaries in the area of Lot 49-52 based on review of aerial photographs, field mapping, and observation of geologic materials in test pit exposures. The geologic maps by Leighton (2000) and CHJ (2009) are in agreement that the landslide referenced in the comments letter is not present and that landslide deposits do not extend across the Glendora/San Dimas city limit. Therefore, no mitigation/remedial grading are required within the City of Glendora.



Based on the development plans, grading or earthwork for the project is not proposed within the City of Glendora in the area of proposed Lots 49-52. Mitigation of unsuitable soils/geologic materials can be accomplished for the project by grading within the limits of the City of San Dimas.

Impacts to properties in Glendora from grading to mitigate unsuitable soils conditions within the project site are not anticipated if the project is designed and constructed according to applicable civil and grading codes.

We trust this information is as requested. If you should have additional questions, please contact this firm at your convenience.

Respectfully submitted,
C.H.J., INCORPORATED


John S. McKeown, E.G. 2396
Project Geologist


Jay J. Martin, E.G. 1529
Vice President



11-15-10



11-15-10

JSM/JJM:ndt

Enclosures: Brasada DEIR Comments (City of Glendora)
References

Distribution: NJD, Ltd. (2)
City of San Dimas (1)
PBSJ (1)
Fusco (1)



CITY OF GLENDORA CITY HALL

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November 2, 2010

Delivered Via Electronic Mail & U.S. Mail

Mr. Larry Stevens, AICP
City of San Dimas
Assistant City Manager for Community Development
245 East Bonita Avenue
San Dimas, CA 91773

Re: Brasada DEIR Comments

Dear Larry:

Below please find comments from the City of Glendora concerning the Draft EIR and proposed subdivision map for the Brasada project proposed by NJD. Please keep the City informed of any revisions made to the project. Our staff is also available to meet and discuss the comments further if needed.

Geology & Soils

- a) The August 2009 geotechnical investigation prepared for this project identifies a number of landslide areas in the northwest portion of the site affecting Lots 49-52. One area is located directly adjacent to Lot 51 and is depicted to end approximately 100 feet from the boundary line with Glendora. A second is shown over Lots 49 & 50. Possible mitigation is identified on Page 14 which identifies a number of strategies to address landslides. Page 16 goes on to state that up to 35 feet of material in the area may need to be removed.

A June 2000 supplemental geotechnical investigation prepared by Leighton and Associates submitted by NJD for development in the City of Glendora shows a different depiction of the landslide boundaries for the area north of Lot 51. Rather than terminating at the location identified by Test Pit 19 ("TP19") in the proposed project's geotechnical investigation, landslide boundaries are shown to continue several hundred feet to the southwest and over the Glendora/ San Dimas boundary. If this is the case, the removals recommended by the current report would result in over-excavation into Glendora, assuming the stated level of removals identified on Page 16 of the 2009 geotechnical investigation is followed. This activity has not been analyzed by the DEIR. In addition, the DEIR does not analyze any impacts of the described mitigation proposed in San Dimas to property in Glendora immediately adjacent to the project.

If no remediation is planned for the Glendora side, the DEIR should identify any residual impacts caused by altering only a portion of mapped landslides in San Dimas such as the potential for increased water runoff over areas susceptible to slope stability issues. Analysis of impacts mitigation may have is required by Section 15126.4 of the CEQA Guidelines.

- b) Sheet 12 of the Tentative Tract Map indicates a grading limit line that crosses the Glendora/ San Dimas jurisdiction line. Given the proximity of grading to Glendora's jurisdiction, and to avoid creating impacts not addressed by the DEIR, the Tentative Tract Map needs to be revised to pull Brasada Lane further east near the boundary with Glendora so that the grading limit line is completely contained within the City of San Dimas. The City also recommends that a mitigation measure and condition of approval be included in the project approval to establish a construction limit line in areas where work is proposed closer than 10 feet to the Glendora/ San Dimas boundary.

Hydrology and Water Quality

- c) In Appendix 11 of the SUSMP report, reference was made to percolation tests done in 1998 and again in 2008. Maps indicating where percolation tests were performed are unclear as to the location of these tests. Percolation tests should have been performed in the area of proposed water quality basins to ensure the project will comply with SUSMP requirements. The Final EIR should verify that percolation tests were conducted in the area of proposed water quality basins.
- d) Information should also be provided concerning any intended draw from wells referenced in the Brezack & Associates report (Wells 4407B and 4416M). While the Main San Gabriel Basin as a whole cannot be overdrawn as a matter of law, any impacts resulting from overdrawn individual well sites should be identified, if any.
- e) The paragraph above the Summary section ends in an incomplete sentence and needs to be revised (Page 4.8-19)

Transportation and Traffic

- f) The Traffic Impact Analysis does not provide a complete warrant analysis per the Manual of Uniform Traffic Control Devices. The Manual lists eight warrants to analyze when considering a traffic signal and the analysis in the DEIR only provides two. The TIA report should be modified and any resulting changes in the analysis identified in the Final EIR.

Utilities, Service Systems and Energy

- g) The sewer study calculations list the average persons per household at 2.78. Table DP-1 to the left of the calculations page lists the average household size of owner occupied units as 2.87. Calculations need to be corrected and any change in the level of project impact should be updated in the Final EIR.

Recommended Tentative Map Conditions

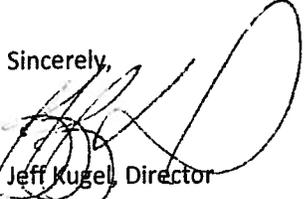
The City respectfully requests that the City of San Dimas consider incorporating language into the Tract Map conditions of approval that address the following:

Emergency Access: Approval of the Final Map shall not include emergency access through Glendora unless the subdivider has obtained any zoning approvals, environmental approvals, and property owner consent required to alter existing roads located in Glendora.

Drainage: Approval of the Final Map shall be subject to a final hydrology study which verifies that the proposed development will not increase discharge to downstream properties that exceed current conditions in a "clearflow" scenario.

Should you have any questions, please feel free to contact me at (626) 914-8217.

Sincerely,



Jeff Kugel, Director
Planning & Redevelopment



References

Geotechnical Investigation for EIR Purposes, Proposed Tentative Tract No. 70583, Approximately 300-Acre Site, San Dimas Foothills, San Dimas, California, report prepared by C.H.J., Incorporated, dated August 20, 2009, Job No. 09355-3.

Leighton and Associates, 1999a, Limited EIR Level Geotechnical Review of the 200-Acre Proposed Residential Development, Wildwood Canyon Area, Northeast of Wildwood Canyon Drive, City of Glendora, California, dated March 5, 1999, project no. 2980169-003.

Leighton and Associates, 1999b, Addendum Report, Limited EIR Level Geotechnical Evaluation of the 200-Acre Proposed Residential Development, Wildwood Canyon Area, Northeast of Wildwood Canyon Drive, City of Glendora, California, dated March 5, 1999, project no. 2980169-003.

Leighton and Associates, 2000, Revised Report of Supplemental Geotechnical Investigation, in Support of The Environmental Impact Report, Proposed Canyon Oaks Development, Wildwood Canyon Area, City of Glendora, California, dated June 28, 2000, project no. 2980169-004.

ATTACHMENT B

**Revised Supplemental
Geotechnical Investigation for NJD-owned
property in Glendora, California
prepared by Leighton and Associates
(June 28, 2000)**

ATTACHMENT C

**L&L Environmental, Inc.
Response to EIR Comments –
Councilman Denis Bertone Letter
(November 16, 2010)**



November 16, 2010

Larry Stevens
Assistant City Manager
CITY OF SAN DIMAS
245 East Bonita Avenue
San Dimas, CA 91773

REGARDING: RESPONSE TO EIR COMMENTS – COUNCILMAN DENIS BERTONE LETTER

L&L Environmental, Inc. (L&L) is pleased to respond to the comment letter from Councilman Bertone and to answer specific question regarding our surveys, methods and results.

Please let me know if you have additional questions or require anything further from us at this time.

Sincerely,
L&L Environmental, Inc.


Leslie Nay Irish
Principal

LNI/nrp

Cc: Stan Stringfellow

H: \Environmental\Projects - Current\100015807 Brasada Residential Project EIR\Response to Comments\Attachments to the RIC\Attachment C_L&L Responses to Bertone letter.doc

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N-3 - What is the difference between formal and informal consultation?

Informal and formal consultations are essentially two stages of a process. The US Fish and Wildlife (USFWS) looks at proposed impacts that may threaten listed species during an informal consultation period and then responds as to the project's potential to impact protected resources. If the USFWS determines that a project "may affect" protected resources, the USFWS issues a finding in a "may affect" letter and then formal consultation would follow. If the USFWS determines that the project is not likely to affect protected resources, then a "not likely to affect letter" is issued and the informal consultation process ends. Formal consultation, if it occurs will be at the discretion of the USFWS.

Similarly, the California Department of Fish and Game (CDFG) has a process where projects undergo a preliminary or pre-application consultation. This occurs in stages. One onsite meeting with CDFG has already occurred and is reflected in our report. Additional onsite meeting(s) will occur as the regulatory permit process proceeds, at the discretion of CDFG.

N-4 - Besides the Gnatcatcher, were any focused studies done.

Incorporated into our biological assessment which is based on habitat, we addressed species present or potentially present on the property. A determination of whether a species was present or potentially present was made based on the record search and the habitat assessment. L&L determined which species (with specified focused survey protocol) would require a focused survey. Focused surveys were then performed for the Gnatcatcher (1997 Protocol) and (all) Botanical Species (2009 CDFG – Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities). In addition, we performed a focused tree survey (using City of San Dimas Guidelines) and a focused assessment for presence or absence of habitat to support the Red-legged frog (2005 Protocol) and incidental to that, and looking for many of the same habitat features, at the same time, for the potential to support a newt species. The list of species addressed is long but it included raptor nest survey which found 2 nests associated with a nesting pair of Red-tailed hawks.

N-5 – In my opinion a focused study is necessary for all species that have a high potential to occur, as well as those that do occur.

Not every species that may be present on a property is required to have a focused study. That decision is based on whether the species is protected and whether there is an accepted method (protocol) to conduct a focused survey. While some species of local concern or habitat types of local concern can be addressed in local survey (city or county) guidelines, focused studies are conducted according to a particular written and /or accepted protocol developed by the resource agencies (USFWS / CDFG). These can also be developed by other recognized authorities including consortiums, councils and or societies i.e.: the Burrowing Owl Consortium, the Desert Tortoise Council or the Native Plant Society for a particular species. When surveying for a specific species where an individual protocol does not (yet) exist, the general survey guidelines are used. For example, as discussed above, listed botanical species are surveyed using the 2009 CDFG botanical protocol.

Periodically, new species are "listed" and critical habitat is designated by one or both of the agencies (CDFG/USFWS). Following this, if an accepted protocol has not been developed, professionals working together with the resource agencies or societies providing education and support for the species i.e. the Desert Tortoise Council, develop new or updated survey protocol /guidelines.

Generally speaking, protocol is developed on an as needed basis for newly protected individual species. Many species which have achieved “watch” status or a preliminary listing do not yet have individual survey protocol. As a species becomes more and more impacted by habitat loss and or reproductive failures (egg loss due to DDT, etc) the agencies start requiring surveys for data collection purposes and or performing census surveys. However, the largest number of species occurring or potentially occurring within any property in California will be addressed via a habitat assessment, a general biological survey or a more intensive biological assessment such as the one prepared for this property / project.

N- 6 – Page 4.3-15 states that the closest occurrence of the Bald Eagle is in Big Bear. The Bald Eagle occurs yearly in Bonelli Park.

L&L performed a record search for listed species on the California Department of Fish and Game CNDDDB, the California Natural Diversity Database. No record of occurrence of the Bald Eagle was recorded closer than Big Bear (20 miles) on the CNDDDB. Following your comment L&L checked the E-bird website (a public website) and found records of the Bald Eagle at Puddingstone Reservoir, which is considerably closer to the property. L&L’s report will be revised to show this additional source of information and location.

Bald Eagles are known to forage long distances over open spaces along the Pacific Coast where they can take game and domesticated or agricultural species as well. Bald eagles are opportunistic feeders with fish comprising much of their diet. They also eat waterfowl, shorebirds, colonial waterbirds, turtles, and carrion (often along roads or at landfills). Because they are visual hunters, eagles typically locate their prey from a conspicuous perch, or soaring flight, then swoop down and strike. During the nesting period, breeding bald eagles occupy and defend “territories.” A territory includes the active nest and may include one or more alternate nests that are built or maintained but not used for nesting in a given year. Bald eagles tend to return to the same territory year after year.

The Bald Eagle was delisted in 2007 but remains protected by the Bald Eagle and Golden Eagle Act (1940), and the Lacey Act (1900) making it a Federal offense to take, possess, transport, sell, import, or export their nests, eggs and parts that are taken in violation of any state, tribal or U.S. law. It is also protected, as are all nesting birds by the Migratory Bird Treaty Act.

Bald eagles generally nest near coastlines, rivers, and large lakes where there is an adequate food supply. They nest in mature or old-growth trees, snags (dead trees), cliffs, and rock promontories. Recently, and with increasing frequency, bald eagles are nesting on artificial structures such as power poles and communication towers. In forested areas, bald eagles often select the tallest trees with limbs strong enough to support a nest that can weigh more than 1,000 pounds. Nest sites typically include at least one perch with a clear view of the water, where they forage. Eagle nests are constructed with large sticks, and may be lined with moss, grass, plant stalks, lichens, seaweed, or sod. Nests are usually about 4-6 feet in diameter and 3 feet deep, although larger nests exist. Clearly a nest of this size would be observable not only during a survey but also by the residents frequenting the property on horseback or along hiking trails.

While foraging habitat exists on the property and was reported in our Biological Assessment, the Bald Eagle was not observed nor was Bald Eagle nests or other sign observed during our field surveys on the property. The confidence factor for the survey results on this species given that a biologist visited the property repeatedly over many months for long days in good weather is quite high.

N-10 – I have been told by biologist that the type of wildlife found in the San Gabriel foothills is considerably different than that found in the National Forest. Is this true?

Habitat found in the San Gabriel foothills differs by habitat type (communities) and by elevation from the National Forest lands and these among other factors control the species that occupy the area. Some overlap is expected in the margins and / or ecotones and intergrades of these habitats for example coastal sage overlaps with chaparral species on the subject property. Some variation of both botanical and wildlife species will result within these areas and in the immediate area.

N-11 – I have been told that wildlife that uses the foothills as a corridor may not necessarily use the National Forest. Is this true?

Corridors are often discussed by the resource agencies as habitat or land features that allow movement between larger open spaces or resources areas. For example certain larger mammal species may move into an area to take advantage of a grassland food source or fruits or nuts available during certain times of the year. They may disperse young into adjacent but consistent habitat or they may move into an area because of changed environmental conditions like an increased volume of available food or stressors like fire and drought. Though the property offers topographic features like drainages and ridgelines trending north / south which are suitable for foraging movement, dispersal or sheltering these species are constrained by already existing development to the south, east and west and by more dramatic elevation changes to the north. The species within this area have limited access to outside genetic material through interaction with their larger regional community.

N-12 – Were focus studies done for the Plummer's Mariposa Lily and the California black walnut trees.

The Plummer's Mariposa Lily does not have individual study protocol; so, as discussed earlier, it was included in the 56± hour 13 site visit focused botanical survey. This species occurs on the property and photographs were included in the report.

The California black walnut is present within the property and 138 are mapped (individually assessed, and GPS located within the development footprint). These trees were assessed during a focused tree survey of the project footprint and the entire list was included in table 16.

N-13 – If studies were not done, why?

See N-12 above

N-14 – There needs to be a focused study on all plants and wildlife species listed on the map. Development should be avoided in areas where these species exist.

The map reflects the species that were observed and their actual locations during focused or general studies. As discussed above, if no species specific protocol exists for the individual species it was covered in the appropriate general protocol.

N-15 – What specific species (threatened or endangered) were surveyed and what type of survey was performed.

Focused protocol surveys for the California Gnatcatcher (BA pages 12, 13, 14, 43, 44 and part of 45), and the Thread leaved brodiaea (BA pages 12, 13, 29 & 32) and a focused habitat assessment for the California Red-legged frog (BA pages 16, 37, 38 & 39) were performed.

See also N-4 & 5 above

N-16 – Were the requirements and /or suggestions put forth in this paragraph (Initial Study, page 17) followed, please explain.

Page 17 of my initial study covers water or soil stabilizing agents, so I am responding in general to the species listed and yes, as discussed earlier, each species was researched during a record check and the assigned a probability factor. Following this an intensive effort was made in the field based on habitat to search for the species. Some followed a focused survey protocol but others were systematically and specifically searched for during the general biological or focused botanical surveys a methodology recognized and approved by the wildlife agencies.

Some species specifically listed in the Initial Study did not have habitat present on the property or as in the case of the Quino Checkerspot Butterfly the property is not within the known range.

Similarly we searched for habitat for the Red-legged frog and the Least Bell's vireo and found no suitable habitat present. Both of these species require a specific kind of riparian habitat and it is not available on the property. However it was reported in previous documents as occurring nearby and this is consistent with our findings.

Species on the IS list are reported in the probably assessment table and if they also have listing status, even locally, they are reported in the text as well. For example the Coastal California gnatcatcher was reported in the record search as observed in the area and habitat is present on the property, though it is above the normal elevation range of the bird. Because the bird might be found using the property during times of environmental stress like those discussed earlier we searched over a two year period, six weeks each. Findings for this bird were negative for occurrence and negative for sign. Greater information is supplied in the report for each of the species.

One bird the Cactus wren a state species of special concern is present and reported on the property though it lacks federal protection status, this species was addressed and is covered in the recommended mitigation measures which include habitat replacement of the coastal sage / cactus sub-habitat community.

N-17 – Were the requirements and or suggestions put forth in this paragraph followed? Please explain.

Grassland, riparian oaks and coastal sage is mapped on the property on the habitat maps (figure 11) which also shows the project as an overlay. At the request of the City, L&L provided a figure showing the project overly onto sensitive species and critical habitat. This figure was included in the PBS&J, EIR document. Planned disturbances therefore are covered and it is also addressed in the proposed mitigation in the form of ratios for public review and comment.

At this point, mitigation has not occurred because the project has not been considered and approved. Upon approval of the project, its implementation will be subject to the project's conditions of approval and the implementation of the mitigation measures in the Mitigation Monitoring Reporting Program.

Specific mitigation locations will be developed as a part of the landscape plan which is dependent on the precise grading plan. A mitigation plan is not finalized until the resource agencies have commented on issues such as riparian mitigation zones and these are generally based on the availability of water and maintenance access. Typically plan finalization occurs just prior to grading and is consequently subject to the conditions of approval developed during the EIR / and Tentative Track Map stage. As a result of the EIR mitigation measures and Tract Map conditions, the project will be conditioned on complying with these requirements. Water and maintenance access issues are generally transmitted to L&L following submittal of the grading plan and receipt of City department review and comment. These subsequent layers of plans are beyond the level of the biological assessment done at the EIR level. For this reason, we addressed the issues in the mitigation plan section of the biological assessment and displayed proposed ratios.

Going forward in time, as the project matures the actual mitigation ratios can not be less that disclosed in the biological assessment /EIR, but it may be more. The city will issue conditions of approval prior to the issuance of grading permit and this permit will require the final documents. But even if that were not also the case, the CDFG reviews the final project plans to determine consistency with the EIR before it issues the Streambed Alteration Agreement and this agreement also addressed all mitigation on the property because the CDFG is considered the caretaker the states habitat and wildlife resources. For this reason, the final location of all mitigation is developed in the mitigation plan which then addressed all of the proposed mitigation including that required by the regulatory agencies.

N-18 – Why weren't these directives (focused studies) carried out?

Studies were conducted for sensitive wildlife species, and focused surveys for state or federally listed threatened or endangered wildlife where habitat was present on the property, during the optimal survey period. The specific listed nine species listed was addressed as follows:

Quino checkerspot butterfly – Although the Northern Foothills Implementation Program EIR indicates that habitat on-site should be assessed for host plants, the USFWS Recovery Plan (2002) and the CNDDDB records indicate that the survey area is located well outside of the current known range of the species. Records from Los Angeles, San Bernardino and Orange Counties are historic and are listed on the Quino Recovery Plan as occurring before 1986 and consist of very few records. The closest recorded quino location is an historic record in Orange County, approximately 4.5 miles to the southwest of the site (L&L page 50).

L&L biologist Guy Bruyera holds a survey permit for the federally listed Quino and was on the site for surveys during the quino flight season 2010 over an extensive period and he included a butterfly inventory. No quino were observed. The site does support host plants, however, based on the survey data, dates conducted and the publication of the Recovery Plan 2002 L&L did not recommend or conduct focused surveys.

Santa Ana sucker, - The site lacks surface fresh water to support the species, no suitable habitat is present, no focused survey was recommended or conducted (L&L, page 35)

Arroyo southwestern toad - . With the lack of aquatic habitat, it was determined that no suitable habitat for the federally endangered arroyo toad occurs in the survey area. The survey area is not located within critical habitat for the arroyo toad (L&L page 39).

California red-legged frog – A focused habitat assessment was conducted by an authorized biologist (Scott Cameron) and no suitable habitat was found. A full protocol survey was not recommended or conducted.

Southwestern willow flycatcher - No suitable habitat is present on the property, a focused survey was not recommended or performed.

Least Bell's vireo – No suitable habitat is present on the property, a focused survey was not recommended or performed.

Bank Swallow (nesting), No suitable habitat is present on the property, a focused survey was not recommended or performed.

Coastal California gnatcatcher – Marginally suitable habitat is present on the property, focused surveys were performed in 2009 and 2010. The species was not found to be currently occupying the property. However, habitat replacement has been proposed.

Raptor (nesting) – Habitat is present on the property; a search for nests was conducted. Two nests were reported as occurring in the project area; neither was occupied in 2009 however one pair of nesting Red-tailed hawks was observed in 2010 utilizing one of the two nests.

N-19 – Were any of these species surveyed or studied? Which ones and how they were surveys conducted.

When suitable habitat for these species was found to be present within the property and where focused survey protocol exists, a focused habitat assessment occurred followed by a protocol survey. In this case one species the Red-legged frog has protocol but no habitat is present on the site so the field studies stopped after a habitat assessment with negative findings.

One species the California gnatcatcher had marginal habitat present and one known occurrence in the area so the habitat assessment proceeded to a full protocol study twice over a two year period. These were 6 week nesting season protocol surveys. The gnatcatcher was not observed in either year.

The Quino checkerspot butterfly was found to have potential habitat present on the property and Guy Bruyey who holds a federal permit for the species was present on the property during the Quino flight season and he performed a butterfly survey as a part of his general field work. The site is outside of the currently known range of the species and it was not observed. A full focused survey was therefore not conducted for the Quino.

A raptor nesting survey is a part of any biological field study and in this case it was performed twice on the property over the two year period. Suitability for foraging was also addressed. Findings were positive because two nests and several raptor species were observed and these are reported in the biological assessment according to habitat types.

ATTACHMENT D

**L&L Environmental., Inc.
Addendum to the Biological Assessment,
Botanical Survey, and Coastal California
Gnatcatcher Survey Update
for the Brasada Residential Project
(November 18, 2010)**

November 18, 2010

Larry Stevens
Assistant City Manager
CITY OF SAN DIMAS
245 East Bonita Avenue
San Dimas, CA 91773

REGARDING: RESPONSE TO EIR COMMENTS – AMENDMENT – BALD EAGLE

The L&L Environmental, Inc. (L&L) Biological Assessment, Botanical Survey, and Coastal California Gnatcatcher Survey Update report for the Brasada Project, Tentative Tract Map 70583, Specific Plan 25, City Of San Dimas, California Dated September 1, 2010 addressed the issue of the Bald Eagle on page 42, as follows:

Table 8. Special Status Bird Species

<i>Haliaeetus leucocephalus</i> Bald eagle	Breed in large trees, usually near major rivers or lakes; winters more widely; wide but scattered distribution in N America; esp. coastal regions	Fed: Delisted Calif: END NDDB: S2	LOW No suitable large bodies of water. Closest record Big Bear, San Bern. May occasionally forage.
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The actual closest known location of the Bald Eagle is at Puddingstone Reservoir therefore the following correction has been made:

Table 8. Special Status Bird Species

<i>Haliaeetus leucocephalus</i> Bald eagle	Breed in large trees, usually near major rivers or lakes; winters more widely; wide but scattered distribution in N America; esp. coastal regions	Fed: Delisted Calif: END NDDB: S2	LOW No suitable large bodies of water. Closest record Big Bear, San Bern. Puddingstone Reservoir, LA Co. May occasionally forage.
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The entire corrected page follows:

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<i>Elanus leucurus</i> White-tailed kite (nesting)	Breeds in woodlands and riparian forests or near marshes at the edge of open terrain/foraging areas such as savanna, partially cleared lands and cultivated fields, mostly in lowland situations. Pacific Coast (Calif, northern Baja, Oregon), other scattered localities	Fed: None Calif: None NDDDB: S3	Nesting: LOW-MODERATE Foraging: MODERATE Not observed over 2 years, no marsh or wetland, but potential open woodland habitat
<i>Empidonax traillii extimus</i> Southwestern willow flycatcher	Rare and local is southern Calif.; breeds in extensive thickets of willow riparian forests; southwest US and northern Baja Calif.	Fed: END Calif: END NDDDB: S1	LOW-ABSENT No suitable riparian thickets or regular water source. Closest record 18 mi s at the Prado Dam
<i>Eremophila alpestris actia</i> California horned lark	Short-grass prairie, "bald" hills, mtn meadows, open coastal plains, fallow fields and alkali flats. W/i coastal Sonoma Co. to San Diego Co., San Joaquin Valley and east to foothills	Fed: None Calif: None NDDDB: S3	OCCURS
<i>Falco columbarius</i> Merlin	Woodlands, grasslands, agricultural fields, and areas around livestock feed lots. Winter migratory bird to southern California.	Fed: None Calif: None NDDDB: S3	Nesting: LOW Foraging: LOW Not observed over 2 years
<i>Falco mexicanus</i> Prairie falcon (nesting)	Nests on high cliffs, primarily in desert and semi-desert areas with little disturbance. forages primarily over open lands; occurs throughout arid western US and Mexico. Breeding in so. California is significantly reduced.	Fed: None Calif: None NDDDB: S3	Nesting: LOW-ABSENT Foraging MODERATE Nesting habitat not present, but may occas. Utilize site.
<i>Falco peregrinus anatum</i> American Peregrine falcon (nesting)	Found in a large variety of open habitats, but prefers accessible open water. Breeds mostly in woodland, forest and coastal habitats. In CA primarily in coastal estuaries and inland oases. Nests in cliffs along mnt valleys and river gorges usu. < 9500 ft. elev.	Fed: Delisted Calif: END NDDDB: S2	LOW No accessible open water adjacent to habitat.
<i>Haliaeetus leucocephalus</i> Bald eagle	Breed in large trees, usually near major rivers or lakes; winters more widely; wide but scattered distribution in N America; esp. coastal regions	Fed: Delisted Calif: END NDDDB: S2	LOW No suitable large bodies of water. Closest record Puddingstone Reservoir, LA Co. May occasionally forage.
<i>Icteria virens</i> Yellow-breasted chat	Summer resident, inhabits riparian thickets of willow near watercourses, low dense riparian willow.	Fed: None Calif: SSC NDDDB: S3	LOW-ABSENT No suitable riparian thickets or regular water source.
<i>Ixobrychus exilis hesperis</i> Western least bittern	Freshwater and brackish marshes with tall, dense emergent vegetation and clumps of woody plants over deep water (Gibbs et. al 1992) Summer resident in So. CA Wide spread in the US, Canada and Mex. Migrates So. in winter.	Fed: None Calif: SSC NDDDB: S1	ABSENT No suitable habitat
<i>Lanius ludovicianus</i> Loggerhead shrike (nesting)	Open areas where small trees, shrubs, and fences can provide suitable perches. Nests in small trees and large shrubs. Throughout much of North America.	Fed: None Calif: SSC NDDDB: S4	Nesting: HIGH Foraging: OBSERVED 2009

This new information does not change the report analysis or conclusions because the property was already reported as suitable for Bald Eagle foraging. No new mitigation measures are required due to the revised information.

Please let me know if you have additional questions or require anything further from us at this time.

Sincerely,
L&L Environmental, Inc.


Leslie Nay Irish
Principal

LNI/nrp

Cc: Stan Stringfellow

ATTACHMENT E

**United States Fish and Wildlife Service
Letter Addressing the Notice of Preparation
for the Northern Foothills Program
Environmental Impact Report
(January 21, 1999)**



United States Department of the Interior

Fish and Wildlife Service
Ecological Services
Carlsbad Fish and Wildlife Office
2730 Loker Avenue West
Carlsbad, California 92008



ved

JAN 28 1999

City of San Dimas
Planning Division

JAN 21 1999

Mr. Lawrence L. Stevens, AICP, Planning Director
City of San Dimas
245 East Bonita Avenue
San Dimas, California 91773

Re: Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Proposed Northern Foothills Implementation Program, Los Angeles County, California.

Dear Mr. Stevens:

We have reviewed the above referenced NOP, dated December 18, 1998, and the accompanying Initial Study/Environmental Checklist received on December 21, 1998, for the Proposed Northern Foothills Implementation Program (NFIP). We offer the following comments and recommendations regarding program-associated biological impacts based on our review of the NOP, the Initial Study/Environmental Checklist, and our knowledge of declining habitat types and species within Los Angeles County.

The approximately 3,000-acre NFIP study area is located north of Foothill Boulevard, in the northern portion of the City of San Dimas (City), Los Angeles County. The area is generally bordered by the Angeles National Forest to the north and northeast, the City of La Verne to the southeast, residential areas to the south, and the City of Glendora immediately to the west. The primarily undeveloped site consists of habitats, such as chaparral, coastal sage scrub, grassland, woodland, and riparian scrub.

The proposed action, as described in the NOP and Initial Study/Environmental Checklist, entails (1) a General Plan Amendment and (2) a Zone Change/Specific Plan. Under the existing General Plan, the maximum development permitted within the NFIP area (one dwelling unit per 5 acres) would permit 195 dwelling units on 972 acres of the program area. The development strategy proposed in the *Northern Foothills Development and Infrastructure Study* (November 1998) would permit a maximum of 127 dwelling units on 972 acres. The City proposes to amend its General Plan to create a "Northern Foothills" land use designation and to outline policies and requirements consistent with the aforementioned study. The Zone Change/Specific Plan is a request to create a new zone or specific plan to implement the policies and requirements of the General Plan and the adopted development strategy. The overall objective is to fit projects into their hillside setting rather than altering the hillside to fit the project. As stated in the Initial Study, the priority between development and natural resource values should be given to protecting the resource.

We are concerned for the protection of fish and wildlife resources and their habitats. In this regard, we provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act. We also administer the Endangered Species Act of 1973, as amended (Act). Section 7 of the Act requires Federal agencies to consult with the Service should it be determined that their action may affect a listed threatened or endangered species. Section 9 of the Act prohibits the "take" (e.g., harm, harassment, pursuit, injury, kill) of federally listed wildlife species. "Harm", a form of take, is further defined to include habitat modification or degradation where it kills or injures wildlife by impairing essential behavioral patterns including breeding, feeding or sheltering. Take can only be permitted pursuant to the pertinent language and provisions in section 7 (Federal consultations) and 10 (permits) of the Act.

The Natural Community Conservation Planning Act (NCCP) was enacted in 1991 to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development growth. The law provides an alternative to "single species" conservation through the formulation of regional, natural community-based, habitat protection programs. The coastal sage scrub plan in southern California is the first of the NCCP projects in the state. The NCCP plans have been developed to provide adequate mitigation for impacts to the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) and other identified species' habitat. Planning for long-term protection and management of coastal sage scrub resources is implemented through participating land owners and jurisdictions enrolled in the program. The City of San Dimas is one of two cities in Los Angeles County that has enrolled for lands under its jurisdiction. As such, the City of San Dimas has assumed specific responsibilities regarding compliance with interim habitat loss approvals and participation in the preparation of a subregional NCCP Plan. However, this agreement appears to have expired. We strongly support the participation of jurisdictions in these regional planning efforts and would urge you to renew your NCCP planning agreement.

We concur with the findings in your Initial Study/Environmental Checklist that the proposed action has the potential for significant impacts to biological resources. Therefore, we request that as many comprehensive, current, biological surveys as practicable be performed in the program area when preparing this DEIR. We recommend that these include directed surveys for potentially occurring Federal and State-listed species, using standard survey protocols. To facilitate the evaluation of the proposed program from the standpoint of fish and wildlife protection, we request that the DEIR contain the following specific information:

1. A description of the environment in the vicinity of the NFIP program area from both a local and regional perspective, and a complete discussion of the purpose and need for the proposed changes and each of the alternatives.
2. A complete description of the proposed program, including a definition of a Northern Foothills land use designation. A discussion should be included of alternative configurations of proposed developed areas and their relation to surrounding open space areas. This

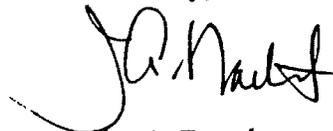
description should include all practicable alternatives that have been considered to avoid and reduce program impacts to sensitive habitats, wetlands, and endangered, threatened or sensitive species to the maximum extent practicable.

3. Quantitative and qualitative assessments of the biological resources and habitat types that will be impacted by the proposed program and its alternatives. This assessment should include a list of Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species that are in the program site, including a detailed discussion of these species and information pertaining to their local status and distribution. The anticipated or real impacts of the NFIP on these species should be addressed fully. We are particularly interested in any and all information and data (including as many species surveys of the NFIP area as practicable and appropriate) pertaining to potential or real impacts to populations of other Federal candidate, proposed, or listed species; and State-listed species, such as the federally threatened gnatcatcher, endangered southwestern arroyo toad (*Bufo microscaphus californicus*), endangered Quino checkerspot butterfly (*Euphydryas editha quino*), endangered least Bell's vireo (*Vireo belli pusillus*), endangered southwestern willow flycatcher (*Empidonax traillii extimus*), threatened California red-legged frog (*Rana aurora draytoni*), endangered Braunton's milk-vetch (*Astragalus brauntonii*), endangered Nevin's barberry (*Berberis nevinii*), and threatened thread-leaved brodiaea (*Brodiaea filifolia*). We are also interested in information on the locally sensitive species listed in the attachment. We are also interested in impacts to chaparral, coastal sage scrub, woodlands, native grasslands, and riparian scrub habitats. The DEIR should disclose all impacts to these sensitive resources, and proposed measures to be taken to avoid, minimize, and mitigate these impacts.
4. Specific acreages and locations of all habitat types that will be affected by the proposed program or program alternatives. Maps and tables should be used to summarize such information. These are necessary to assess potential impacts to native flora and fauna.
5. All facets of the program should be included in this assessment, including associated growth-inducing effects and cumulative impacts of the program. The cumulative impacts assessment should include an adequate discussion of past, present, and reasonably anticipated future projects.
6. A detailed analysis of impacts of the proposed General Plan amendment, zone change/specific plan, and development strategy on the movement of wildlife. This discussion should address fragmentation of the natural environment, isolation, edge effects, as well as regional landscape effects. Proposed measures to mitigate for these impacts should also be included.

7. An analysis of anticipated noise and lighting impacts to wildlife species should be provided. Mitigation measures should be incorporated into program design to mitigate for any identified significant, adverse impacts.
8. Section 404 of the Clean Water Act prohibits the unauthorized discharge of dredged or fill material into jurisdictional waters of the United States, including wetlands. Section 404 also provides that the U.S. Army Corps of Engineers (Corps) may issue permits for discharges of dredged or fill material into jurisdictional waters and wetlands. Prior to disturbance, potential areas of Corps jurisdiction should be evaluated and wetlands should be delineated using the methodology set forth in the U.S. Army Corps of Engineers Wetland Delineation Manual (Environmental Laboratory 1987). The DEIR should disclose all impacts to jurisdictional waters and wetlands, and proposed measures to be taken to avoid, minimize, and mitigate these impacts.
9. A description of the kind of environmental documentation and discretionary approvals required for future development proposals within the NFIP area before wildlife habitat is permanently lost. This discussion should address what steps private landowners must take if they wish to develop/improve their land.
10. The specific relationship of the proposal to the State of California's NCCP Program.

Future development within the area covered by the NFIP will likely require additional environmental documentation pursuant to California Environmental Quality Act. Please keep us apprized of any new specific development proposals. We appreciate the opportunity to comment on the referenced NOP for potential impacts on sensitive and endangered species, wildlife and wetlands. If you should have any questions pertaining to these comments, please contact Judi Tamasi of my staff at (760) 431-9440.

Sincerely,



Jim A. Bartel
Assistant Field Supervisor

1-6-99-HC-84

Attachment

cc: Bill Tippets (CDFG - San Diego)

Attachment
Sensitive Species* Which May Occur in the Area
of the Proposed Northern Foothills Implementation Program,
San Dimas, Los Angeles County, California
January 21, 1999

*The following list does not include Federal candidate, proposed or listed species. See accompanying letter.

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Bell's sage sparrow (*Amphispiza belli belli*), western burrowing owl (*Athene cunicularia*), cactus wren (*Campylorhynchus brunneicapillus*), southwestern pond turtle (*Clemmys marmorata pallida*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), San Bernardino ringneck snake (*Diadophis punctatus modestus*), Pacific kangaroo rat (*Dipodomys simulans*), white-tailed kite (*Elanus leucurus*), large-blotched ensatina (*Ensatina eschscholtzii klauberi*), least bittern (*Ixobrychus exilis hesperis*), San Bernardino mountain king snake (*Lampropeltis zonata parvirubra*), loggerhead shrike (*Lanius ludovicianus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), San Diego desert woodrat (*Neotoma lepida intermedia*), Southern grasshopper mouse (*Onychomys torridus ramona*), Dulzura California pocket mouse (*Perognathus californicus femoralis*), pallid San Diego pocket mouse (*Perognathus fallax pallidus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), mountain yellow-legged frog (*Rana muscosa*), coast patch-nosed snake (*Salvadora hexalepis virgultea*), California spotted owl (*Strix occidentalis occidentalis*), two-striped garter snake (*Thamnophis hammondi*), slender mariposa lily (*Calochortus clavatus* var. *gracilis*), Plummer's mariposa lily (*Calochortus plummerae*), San Gabriel Mountains dudleya (*Dudleya densiflora*), many-stemmed dudleya (*Dudleya multicaulis*), pious daisy (*Erigeron breweri* var. *bisanctus*), San Gabriel bedstraw (*Galium grande*), Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), Davidson's bush mallow (*Malacothamnus davidsonii*), rayless ragwort (*Senecio aphanactis*)

ATTACHMENT F

**California Department of Fish and Game
Letter Addressing the Notice of Preparation
for the Northern Foothills Program
Environmental Impact Report
(January 25, 1999)**

DEPARTMENT OF FISH AND GAME

South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(619) 467-4201

**Received**

January 25, 1999

JAN 28 1999

City of San Dimas
Attn: Planning Department
245 E. Bonita Avenue
San Dimas, CA 91773

City of San Dimas
Planning Division

**NORTH FOOTHILLS IMPLEMENTATION PROGRAM
SCH98121072**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. To enable Department staff to adequately review and comment on the proposed project, we recommend the following information be included in the Draft Environmental Impact Report:

1. A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
 - a. A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).
 - b. A complete assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
 - c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).
 - d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to

adversely affect biological resources, with specific measures to offset such impacts.

- a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b. Project impacts should be analyzed relative to their effects on off-site habitats. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided.
 - c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
 - d. A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
 - e. If applicable, the document should include an analysis of the effect that the project may have on completion and implementation of regional and/or subregional conservation programs. Under § 2800-§ 2840 of the Fish and Game Code, the Department, through the Natural Communities Conservation Planning (NCCP) program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity. Coastal sage scrub is the first natural community to be planned for under the NCCP program. The Department recommends that the lead agency ensure that the development of this and other proposed projects do not preclude long-term preserve planning options and that projects conform with other requirements of the NCCP program. Jurisdictions participating in the NCCP program should assess specific projects for consistency with the NCCP Conservation Guidelines. Additionally, the jurisdictions should quantify and qualify: 1) the amount of coastal sage scrub within their boundaries; 2) the acreage of coastal sage scrub habitat removed by individual projects; and 3) any acreage set aside for mitigation. This information should be kept in an updated ledger system.
3. A range of alternatives should be analyzed to ensure that alternatives to the

proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

- a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat elsewhere should be addressed.
 - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
 - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the following information is requested:
- a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
 - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial

Planning Department
January 25, 1999
Page 4

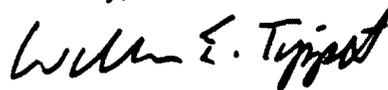
setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

- a. The Department may require a Lake or Streambed Alteration Agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to the applicant's commencement of any activity that will divert, obstruct or change the natural flow or the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a Lake or Streambed Alteration Agreement for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The department as a responsible agency under CEQA, may consider the local jurisdiction's (lead agency) Negative Declaration or EIR for the project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement.

The Department holds regularly scheduled pre-project planning/early consultation meetings. To make an appointment, please call our office at (562) 590-5880.

Thank you for this opportunity to comment. Questions regarding this letter and further coordination on these issues should be directed to Liam Davis at (619) 467-4207.

Sincerely,



William E. Tippetts
Habitat Conservation Supervisor

Attachments

cc: Department of Fish and Game
Chuck Raysbrook
Liam Davis
San Diego

Planning Department
January 25, 1999
Page 5

U.S. Fish and Wildlife Service
Carlsbad

U.S. Army Corps of Engineers
Los Angeles

State Clearinghouse
Sacramento

ATTACHMENT 1

State of California
THE RESOURCES AGENCY
Department of Fish and Game
May 4, 1984

GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED
DEVELOPMENTS ON RARE AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted and what information should be contained in the survey report.

1. Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare and endangered plants and plant communities. Rare and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare and/or endangered under the following definitions.

A species, subspecies or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition or disease. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare or endangered species. The most current version of the California Natural Diversity Database's Outline of Terrestrial Communities in California may be used as a guide to the names of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare plants will be affected by a proposed project where:
 - a. Based on an initial biological assessment, it appears that the project may damage potential rare plant habitat;
 - b. Rare plants have historically been identified on the project site, but adequate information of impact assessment is lacking; or
 - c. No initial biological assessment has been conducted and it is unknown whether or not rare plants or their habitat exist on the site.
3. Botanical consultants should be selected on the basis of possession of the following qualifications (in order of importance):
 - a. Experience as a botanical field investigator with experience in field sampling design and field methods;
 - b. Taxonomic experience and a knowledge of plant ecology;
 - c. Familiarity with the plants of the area, including rare species; and
 - d. Familiarity with the appropriate state and federal statutes related to rare plants and plant collecting.
4. Field surveys should be conducted in a manner that will locate any rare or endangered species that may be present. Specifically, rare or endangered plant surveys should be:
 - a. Conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled (1) to coincide with known flowering periods, and/or (2) during periods of

phenological development that are necessary to identify the plant species of concern.

- b. Floristic in nature. "Predictive surveys" (which predict the occurrence of rare species based on the occurrence of habitat or other physical features rather than actual field inspection) should be reserved for ecological studies, not for impact assessment. Every species noted in the field should be identified to the extent necessary to determine whether it is rare or endangered.
 - c. Conducted in a manner that is consistent with conservation ethics. Collection of rare or suspected rare species (voucher specimens) should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit regulations. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
 - d. Conducted using systematic field techniques in all habitats of the site to ensure a reasonably thorough coverage of potential impact areas.
 - e. Well documented. When a rare or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form should be completed and submitted to the Natural Diversity Data Base.
6. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations, EIR's and EIS's, should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
 - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
 - c. Detailed description of survey methodology.
 - d. Dates of field surveys.
 - e. Results of survey (including detailed maps).
 - f. An assessment of potential impacts.
 - g. Discussion of the importance of rare plant populations with consideration of nearby populations and total species distribution.
 - h. Recommended mitigation measures to reduce or avoid impacts.
 - i. List of all species identified.
 - j. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
 - k. Name of field investigator(s).
 - l. References cited, persons contacted, herbaria visited, and disposition of voucher specimens.

ATTACHMENT 2

SENSITIVITY OF TOP PRIORITY RARE NATURAL COMMUNITIES IN SOUTHERN CALIFORNIA*

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.- Less than 6 known locations and/or on less than 2,000 acres of habitat remaining.
- S2.- Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- S3.- Occurs in 21-100 known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to the natural community regardless of the ranking. For example:

- S1.1 = very threatened
- S2.2 = threatened
- S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifloron Tamar Woodland
	Alhambra Woodland
	Arizona Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
Torrey Pine Forest	
Desert Mountain White Fir Forest	
S1.2	Southern Foradunes
	Mono Pumice Flat
	Southern Interior Basalt Fl. Vernal Pool
S2.1	Venturan Coastal Sage Scrub
	Diegan Coastal Sage Scrub
	Riversidean Upland Coastal Sage Scrub
	Riversidean Desert Sage Scrub
	Sagebrush Steppe
	Desert Sink Scrub
	Mojave Southern Mixed Chaparral
	San Diego Mesa Hardpan Vernal P.
	San Diego Mesa Claypan Vernal P.
	Alkali Meadow
	Southern Coastal Salt Marsh
	Coastal Brackish Marsh
	Transmontane Alkali Marsh
S2.2	Active Coastal Dunes
	Active Desert Dunes
	Stab. and Part. Stab. Desert Dunes
	Stab. and Part. Stab. Desert Sandfield
	Mojave Mixed Steppe
S2.3	Transmontane Freshwater Marsh
	Couler Pine Forest
S2.3	S. California Field
	White Mountains Field
S2.3	Brillatone Pine Forest
	Limber Pine Forest
S3.3	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
Transmontane Alkali Marsh	
S3.3	Coastal and Valley Freshwater Marsh
	S. Arroyo Willow Riparian Forest
S3.3	Southern Willow Scrub
	Modoc-G. Bas. Cottonwood Willow Rip.
	Modoc-Great Basin Riparian Scrub
	Mojave Desert Wash Scrub
	Engelmann Oak Woodland
	Open Engelmann Oak Woodland
	Closed Engelmann Oak Woodland
	Island Ironwood Forest
	Island Cherry Forest
	S. Interior Cypress Forest
	Bigcone Spruce-Canyon Oak Forest

ELEMENT RANKING

GLOBAL RANKING

The *global rank* (G-rank) is a reflection of the overall condition of an element throughout its global range.

SPECIES OR NATURAL COMMUNITY LEVEL

- G1 = Less than 6 viable EOs OR less than 1000 individuals OR less than 2000 acres.
G2 = 6-20 EOs OR 1000-3000 individuals OR 2000-10,000 acres.
G3 = 21-100 EOs OR 3000-10,000 individuals OR 10,000-50,000 acres.
G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat.
G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

SUBSPECIES LEVEL

Subspecies receive a T-rank attached to the G-rank. With the subspecies, the G-rank reflects the condition of the entire species, whereas the T-rank reflects the global situation of just the subspecies or variety.

For example: *Chorizanthe robusta* var. *hartwegii*.

This plant is ranked G2T1. The G-rank refers to the whole species range i.e. *Chorizanthe robusta*. The T-rank refers only to the global condition of var. *hartwegii*.

STATE RANKING

The *state rank* is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the G-rank.

- S1 = Less than 6 EOs OR less than 1000 individuals OR less than 2000 acres
 S1.1 = very threatened
 S1.2 = threatened
 S1.3 = no current threats known
S2 = 6-20 EOs OR 1000-3000 individuals OR 2000-10,000 acres
 S2.1 = very threatened
 S2.2 = threatened
 S2.3 = no current threats known
S3 = 21-100 EOs or 3000-10,000 individuals OR 10,000-50,000 acres
 S3.1 = very threatened
 S3.2 = threatened
 S3.3 = no current threats known
4 = Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat. NO THREAT RANK.
5 = Demonstrably secure to ineradicable in California. NO THREAT RANK.

Notes:

Other considerations used when ranking a species or natural community include the pattern of distribution of the element on the landscape, fragmentation of the population/stands, and historical extent as compared to its modern range. It is important to take a bird's eye or aerial view when ranking sensitive elements rather than simply counting EOs.

Uncertainty about the rank of an element is expressed in two major ways:

By expressing the rank as a range of values:
ex. S2S3 means the rank is somewhere between S2 and S3.

By adding a ? to the rank:

3. Other symbols

- GH All sites are historical; the element has not been seen for at least 20 years but suitable habitat still exists (SH = All California sites are historical).
GX All sites are extirpated; this element is extinct in the wild (SX = All California sites are extirpated).
GXC Extinct in the wild; exists in cultivation.
G1Q The element is very rare, but there is a taxonomic question associated with it.

Top Priority Rare Natural Communities
From Region Five

Code Number	Location	Few Records	Name
S1.1 Rank			
21330	Cis		Southern Dune Scrub
31200	Cis		Southern Coastal Scrub
32400	Cis		Maritime Succulent Scrub
32720	Cis		Riversidean Alluvial Fan Sage Scrub
37030	Cis	Y	Southern Maritime Chaparral
42110	Cis		Valley Needlegrass Grassland
43000	Des	Y	Great Basin Grassland
43777	Des	Y	Mojave Desert Grassland
47000	Cis		Pebble Plains
51177	Cis	Y	Southern Sedge Bog
52310	Cis		Cismontane Alkali Marsh
61700	Des		Mojave Riparian Forest
61810	Des		Sonoran Cottonwood Willow Riparian
61820	Des		Mesquite Bosque
75100	Des	Y	Elephant Tree Woodland
75200	Des	Y	Crookston Thorn Woodland
75300	Des	Y	Alhambra Woodland
75400	Des	Y	Arizona Woodland
81500	Cis		Southern California Walnut Forest
81820	Cis	Y	Mainland Cherry Forest
83122	Cis	Y	Southern Bishop Pine Forest
83140	Cis		Torrey Pine Forest
85330	Des	Y	Desert Mountain White Fl. Forest
S1.2 Rank			
21230	Cis		Southern Foredunes
35410	Des		Mono Pumice Flat
44310	Cis		Southern Interior Basalt Fl. Vernal Pool
S2.1 Rank			
32300	Cis	Y	Venturan Coastal Sage Scrub
32500	Cis		Diegan Coastal Sage Scrub
32710	Cis	Y	Riversidean Upland Coastal Sage Scr.
32730	Cis	Y	Riversidean Desert Sage Scrub
35300	Des	Y	Sagebrush Steppe
35120	Des	Y	Desert Sink Scrub
37122	Cis	Y	Mesa Southern Mixed Chaparral
44321	Cis		San Diego Mesa Hardpan Vernal P.
44322	Cis		San Diego Mesa Claypan Vernal P.
45310	Des		Alkali Meadow
62120	Cis		Southern Coastal Salt Marsh
52320	Cis		Coastal Brackish Marsh
52410	Des		Transmontane Alkali Marsh

Coded as either cis (for cismontane) or des (for desert)

Code Number	Location	Few Records	Name
52410	CS		Coastal and Valley Freshwater Marsh
61320	CS		S. Arroyo Willow Riparian Forest
63320	CS		Southern Willow Scrub
61610	Des		Modoc-G Bas Cottonwood Willow Rip.
63600	Des	Y	Modoc-Great Basin Riparian Scrub
63700	Des	Y	Mojave Desert Wash Scrub
71180	CS	Y	Engelmann Oak Wood
71181	CS	Y	Open Engelmann Oak Wood
71182	CS	Y	Closed Engelmann Oak Woodland
71180	CS	Y	Island Oak Woodland
71210	CS		California Walnut Woodland
81700	CS	Y	Island Ironwood Forest
81810	CS		Island Cherry Forest
83230	CS		S. Interior Cypress Forest
84150	CS	Y	Bigcone Spruce-Canyon Oak Forest
527 Rank			
21100	CS	Y	Active Coastal Dunes
22100	Des		Active Desert Dunes
22200	Des		Stab. and Part Stab. Desert Dunes
22300	Des	Y	Stab. and Part Stab. Desert Sandfield
34220	Des	Y	Mojave Wood Steppe
62420	Des	Y	Transmontana Freshwater Marsh
84140	CS	Y	Coulter Pine Forest
81130	CS	Y	S. California Field
81140	Des	Y	White Mountains Field
523 Rank			
88400	Des		Bristlecone Pine Forest
88700	Des	Y	Umber Pine Forest

