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August 24, 2016

Ms. Mikaela Klein, AIA, LEED AP
Mt. San Antonio College
1100 North Grand Ave.
Walnut, CA 91789

Subject: Mt. San Antonio College 2015 Facilities Master Plan Update Supplemental
Environmental Impact Report

Dear: Ms Klein

This letter provides our responses to the California Department of Fish and Wildlife's (CDFW) comments on the Mt. San Antonio College (Mt. SAC) 2015 Facilities Master Plan Update (FMPU) Supplemental Environmental Impact Report (SEIR). These comments were provided in a letter dated August 8, 2016. The numbering provided below corresponds with that used by your Environmental Impact Report (EIR) consultant, Sidney Lindmark, who is coordinating the responses.

Comment 5-2.1. "CDFW is California's Trustee Agency for state fish and wildlife resources, and holds those resources in trust by statute for all the people of the State (Fish and Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subdivision (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources."

Response 5.2.1. The comments on the agency's responsibilities as a Trustee Agency are noted. No additional response is required.

Comment 5-2.2. "CDFW is also submitting comments as a Responsible Agency under CEQA. (Public 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 and Game Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish and Game Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.”

Response 5.2.2. The comments on the agency’s responsibilities as a Responsible Agency under CEQA are noted. No additional response is required.

Comment 5-2.3. “Mt. SAC has proposed a 2015 Facilities Master Plan Update (FMPU). Three proposed elements of the 2015 FMPU Master Plan Update occur in areas that have not been previously developed. These elements, covering approximately 13 acres of the 420-acre campus, include an irrigation well site, a detention basin upgrade, and fire academy relocation.

Mt. SAC is located in the San Gabriel Valley in southeast Los Angeles County, California. The college is situated near the intersection of North Grand and Temple Avenues in the City of Walnut. It is within un-sectioned land of the Puente Land Grant, Township 2 South, Range 9 East on the U.S. Geological Survey (USGS) 7.5-minute San Dimas quadrangle map.”

Response 5.2.3. The comments are noted and summarize elements of the 2015 FMPU that are of concern for the Agency. It should be noted that the Fire Training Academy project was evaluated in the certified 2012 Master Plan Update (MPU) Final EIR. However, the building has been moved within the site and the parking areas revised. Additional CEQA review will be completed at the site-specific level when a final site plan is available.

Comment 5-2.4. “The SEIR addresses the potential impacts on the state species of special concern burrowing owl (*Athene cunicularia*) but does not address the federally-listed (threatened) coastal California gnatcatcher (*Poliophtila californica californica*) or the state species of special concern coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), both of which are known to occur on site and rely on coastal sage scrub and cactus scrub habitat that are present on site. As indicated in the Biological Technical Report (HELIX Environmental Planning, Inc. [HELIX] 2016), the coastal California gnatcatcher was observed on coastal sage scrub on Mt. SAC Hill in May 2012 and 2015. Similarly, coastal cactus wrens have been heard vocalizing in the coastal sage scrub in May and June 2012. These observations are acknowledged by the study to “indicate that all of the Venturan coastal sage scrub in the study area is occupied by the species.” Based on the information contained in the Biological Technical Report, CDFW recommends the final SEIR include a full analysis of the direct and indirect impacts to these species, and any mitigation required to offset potentially significant impacts.”

Response 5.2.4. The campus biological resource studies are included in the 2008 and 2012 Final EIRs. HELIX first completed a campus biological survey of 140 acres in the 2008 Final EIR (Appendix L¹). This report is the *Mt. San Antonio College 2008 Master Plan Update Biological*

¹ Appendices referenced in this letter are found in the final SEIR for the 2015 FMPU.

Technical Report, dated April 24, 2008. The *Mt. San Antonio College 2008 Master Plan Update Jurisdictional Delineation Report*, dated April 24, 2008, was also completed for areas primarily south of Temple Avenue. The natural area east of Lot F and north of Temple Avenue was also included in the study area.

In 2012, HELIX completed the biological studies for 64.0 acres within the campus, which included the Fire Academy site, a sewer line extension, and the area surrounding Hilmer Lodge Stadium (Appendix E). The *Mt. San Antonio College 2012 Master Plan Update Draft Biological Technical Report* for this project is dated August 17, 2012. The *Mt. San Antonio College California Black Walnut Management Plan*, dated September 21, 2012, included a California black walnut (*Juglans californica*) tree inventory, a mitigation plan, and an implementation plan. The Mt. San Antonio College Campus Zoning now includes a 46-acre Land Management Zone (Exhibit 3.1), in which the California black walnut Management Plan will be implemented.

The biological studies included in the current Final Subsequent EIR (2015 FMPU & PEP [Phase 1, 2]) included surveys of the area listed in Comment 5.2-3. Several additional biological studies were prepared to fulfill conditions for Agency permits for the West Parcel Solar project, which received its CEQA clearances in the 2012 Final EIR. The mitigation stated:

Construction impacts on occupied coastal California gnatcatcher habitat shall be addressed by requested the U.S. Army Corps of Engineers (USACE) initiate a formal Section 7 Consultation with the U.S. Fish and Wildlife Service (USFWS) for “incidental” take of a threatened species. The Section consultation is part of the USACE 404 Nationwide Permit application, Facilities Planning & Management shall monitor compliance.”

The *Mt. San Antonio College 2015 Facility Master Plan Update Biological Technical Report*, dated April 14, 2016, included 22 acres and eight work areas (Figure 3), and addressed the elements identified in Comment 5.2-2. An updated management plan and burrowing owl surveys were completed for the 2015 FMPU project.

Additional biological studies that have been completed as conditions of the USACE 404 permit application for the West Parcel Solar project certified in the 2012 Final EIR include coastal California gnatcatcher (2015) and burrowing owl surveys (2015), and an acoustical study (2016). A burrowing owl survey was also done for the 2015 Master Plan Update footprint in 2016.

Since all campus master plans have been evaluated in a Program EIR (i.e., including Subsequent and Supplement to an EIR), a full analysis of the direct and indirect impacts of development on these species (i.e., coastal California gnatcatcher and coastal cactus wren, and their habitat: Venturan coastal sage scrub, and burrowing owl) has been adequately evaluated in the current and prior EIRs. The complete mitigation plan (2016 MMP), which is enclosed as Appendix D1 herein, includes all required mitigation measures (BIO-01 to BIO-15) for project impacts on biological resources.

However, a Statement of Overriding Considerations (SOC) was adopted in 2012 in the event of “incidental” take of the California gnatcatcher for the West Parcel Solar project. Mt. SAC has been working with the USFWS to finalize the Biological Opinion (BO) and complete the Section 7 Consultation for the West Parcel Solar project. As of the date of this letter, the USFWS has all of the information they need from Mt. SAC to issue the BO. Similarly, the USACE has all the information they need from Mt. SAC to issue a Nationwide Permit, which will include the USFWS’ BO. The current schedule is for the USACE to issue the Nationwide Permit, with the USFWS’ BO incorporated, between the middle and end of September 2016. As such, this project will be a take of this species, but it is expected that USFWS will conclude a no jeopardy finding and a SOC will no longer be necessary for impacts to the coastal California gnatcatcher on the West Parcel Solar project site.

Comment 5-2.5. “The MMP, section B10-03, currently provided as follows: “[p]rior to grading within areas of Venturan Coastal Sage Scrub, the college shall identify replacement 2:1 acreage.” Based on documented use of the site by coastal California gnatcatcher and coastal cactus wren, CDFW does not concur that a habitat mitigation ratio of 2:1 is sufficient to offset Project and cumulative impacts to coastal sage scrub. Coastal sage scrub habitat, including “lower quality”, supports dispersal, feeding, and refuge for both the California gnatcatcher and cactus wren during various life stages (e.g., breeding, foraging, and dispersal) and refugia during wildfire events. The direct and indirect impacts to onsite and adjacent coastal sage scrub should be further evaluated in the final SEIR. The analysis should include use by California gnatcatcher and cactus wren based on appropriate surveys conducted during the appropriate time of year. For coastal sage scrub occupied by sensitive species, CDFW recommends a minimum mitigation ratio of 3:1. Additional mitigation may be required for impacts to occupied California gnatcatcher by the USFWS pursuant to the federal Endangered Species Act. CDFW recommends that Mt. SAC contact the USFWS to discuss potential impacts to the California gnatcatcher from the proposed Project.”

Response 5.2.5. The comment that CDFW does not concur with a habitat mitigation ratio for Venturan coastal sage scrub of 2:1 and recommends a minimum 3:1 ratio is noted.

The mitigation ratio of 2:1 for impacts to coastal sage scrub is consistent with previous mitigation requirements beginning with the 2008 Master Plan Update, and most recently with the review by CDFW of the West Parcel Solar project Habitat Mitigation Plan (HMP) between September 2015 and June 2016. The habitat areas are shown in Appendix A31 and include the restrictive covenant area and portions of Mt. SAC Hill.

USFWS has reviewed the HMP and not requested an increase in the 2:1 coastal sage scrub mitigation. This is also the commonly accepted mitigation ratio for this habitat type throughout southern California.

Mt. SAC had extensive consultations with USFWS prior to certifying the 2012 Final EIR and during the Section 7 consultation and permit applications for the West Parcel Solar project. The previously established mitigation ratios established should apply to the 2015 FMPU.

Comment 5-2.6. “Mitigation Measure B10-05 on Page 6 of the 2012 MMP states that “[t]he College shall adopt a Land Management Plan to minimize impacts on California Black Walnut trees on campus. Any walnut trees with a diameter of six inches, four-feet above ground, damaged, or removed by construction activities shall be replaced according to the standards in Table 4 of the Mt. SAC California Black Walnut Management Plan (HELIX, September 2012). Replacement habitat shall be completed prior to project completion. The required mitigation acreage for replacement walnut trees is 2.02-acres. The replacement specimens shall be preserved, maintained, and monitored for a period of five years to ensure viability.”

Response 5.2.6. The comments are informational and do not raise new environmental issues. No additional response is required.

Comment 5-2.7. “Southern California black walnut (*Juglans californica*) trees found on the Project site should be considered as a locally and regional rare, unique and/or uncommon (and/or) regionally rare plant species; that is, species that are rare or uncommon in a local or regional context, as such, would meet the CEQA definition of a rare species (CEQA §Sec 15380). CEQA directs that a special emphasis be placed on "environmental resources" that are rare or unique to the region and would be affected by a proposed project [CEQA §15125 (c)] or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Public agencies have a duty under the CEQA to avoid or minimize environmental damage and to give major consideration to preventing environmental damage (CEQA §Section 15021). Southern California black walnuts are California Native Plant Society (CNPS) Rank 4.2 and are considered locally sensitive species. In addition, the southern California black walnut is designated S3, which is considered vulnerable in the state due to a restricted range with relative few populations. CDFW would consider loss of on-site populations of southern California black walnut to be potentially significant from a project and cumulative perspective under the CEQA. Accordingly, impacts to these locally rare resources and adequate mitigation measures that reduce the impacts to less than significant should be described and incorporated into the final SEIR.”

Response 5.2.7. The comments are primarily informational and state CDFW policy that the loss of on-site populations of California black walnut may be a project or cumulative impact under CEQA. The 2012 Final EIR addressed these concerns within the *Mt. San Antonio College California Black Walnut Management Plan* (September 21, 2012) and the 2016 MMP requires implementation of the Plan. Therefore, the California black walnut resources are described fully within the existing Mt. San Antonio Community College District (District) CEQA documentation.

Comment 5-2.8. CDFW acknowledges that the SEIR quantifies the impact acreage associated with southern California black walnut; however, the final EIR should quantify the actual number of tree impacted and size of each tree. For example, larger southern California black walnut trees may be over 100 years old and can be used by wildlife species (e.g., raptors) and are not readily replaced, which would be difficult to mitigate to a level of less than significant using only a habitat-based approach. CDFW recommends the final SEIR clarify total individual trees by size, anticipated to be permanently impacted; analyze the significance of impacts; and provide

adequate mitigation, if necessary, to reduce Project and cumulative impacts to less than significant. Feasible mitigation could include long-term protection in place; on-site nuts/seed collection for an on- or off-site mitigation enhancement/restoration area suitable to the species; and/or off-site land acquisition of similar or better habitat with corresponding number of trees (size and ages), all to be preserved with the necessary permanent land use protection (e.g., conservation easement), management and secured endowment funds.”

Response 5.2.8. The *Mt. San Antonio College California Black Walnut Management Plan* (September 21, 2012) quantified the actual number of trees impacted and the size of each tree. The tree inventory of August 21, 2012 included 257 trees that would be impacted by stadium grading.

Previous biological studies have identified all areas with California black walnut but they have not been individually inventoried. The 2005 Master Plan Update (AC Martin Partners) referenced a Mt. SAC Tree Inventory (not dated) on page 40 in the Campus Conservation section (p. 21). Stands of California black walnut trees were included in an exhibit on page 20 of the 2005 Master Plan Update.

The 2015 Facility Master Plan Update impacts only five California black walnut trees, which range in size from 6 to 9 inches at 4 feet above the ground (Table 1). The *California Black Walnut Management Plan* incorporates on-site restoration in an area suitable for the species.

Table 1 CALIFORNIA BLACK WALNUT TREE¹ IMPACT SUMMARY FOR THE 2015 FMPU	
LOCATION	NUMBER²
Detention Basin	5
Tank Site	1
¹ Trees are defined as having a diameter at 4 feet above the ground equal to or greater than 6 inches. ² One of the trees had two trunks with diameters equal to or greater than 6 inches.	

If additional future campus projects impact California black walnut trees, the trees will be inventoried individually as part of a site-specific analysis. The current California black walnut survey methodology is appropriate when some projects are being evaluated in a Program EIR and others either in a Project EIR or as site-specific projects.

Comment 5-2.9. “CDFW also has concerns about the length of the proposed monitoring period for the planted southern California black walnut trees. The SEIR in B10-03 of the MMP states that “these trees should be planted in the approved California Black Walnut Management Plan area and preserved, maintained and monitored for 2 years.” In B10-05 it states that “[t]he replacement specimens shall be preserved, maintained and monitored for a period of five years

to ensure viability." The final SEIR should be revised to achieve consistency between B10-03 and B10-05. Moreover, for larger/older southern California black walnut trees that would be impacted, CDFW recommends that a minimum of 10 years of monitoring be provided for tree plantings and site restoration to ensure that impacts would be reduced to a level of less than significant under CEQA."

Response 5.2.9. The comments are noted. BIO-03, as referenced in the comment, is now BIO-10 in the 2016 MMP (Appendix D1) and has been revised to state the monitoring period is five years. Therefore, the two mitigation measures are now consistent.

BIO-10. Impacts to California Black Walnut trees, if they cannot be avoided, should be mitigated by the replacement of each impacted tree that has a diameter of 6 inches at 4 feet, 6 inches above the ground by a 24-inch boxed specimen (Table 5 in Appendix G1). These trees should be planted in the approved California Black Walnut Management Plan area and preserved, maintained for five years to ensure establishment. Planning & Management shall ensure compliance.

Comment 5-2.10. "The SEIR includes a discussion of impacts to state and federal wetland resources (provide reference to discussion in the SEIR). However, the SEIR does not appear to adequately analyze the wetland buffer proposed at the edge of the wetland along Snow Creek and future construction areas. Wetland buffers are crucial for the current and long-term protection and function of riparian habitat, especially in urban areas. They provide numerous functions, including: (a) expansion of the habitat's biological values (e.g., buffers are an integral part of the complex riparian ecosystems that provide food and habitat for the fish and wildlife); (b) protection from direct disturbance by humans and domestic animals; and, (c) reduction of edge effects from urbanized uses including artificial noise and light, line-of-sight disturbances, invasive species, and anthropogenic nutrients and sediments."

Response 5.2.10. The comment that the SEIR "does not appear to adequately analyze the wetland buffer proposed at the edge of the wetland along Snow Creek and future construction areas" is noted. Figure 4c (Biological Technical Report for the 2015 Facilities Master Plan Update) shows the proposed Fire Training Academy impact area is a minimum of 580 feet from Snow Creek. Figure 4c is included as Appendix A33.

Given the small size of Snow Creek and the large distance from the creek to the proposed location of the Fire Training Academy, it is clear why no mention of impacts to the buffer of Snow Creek is discussed: there are no impacts to the buffer of Snow Creek from the Fire Training Academy (Figure 4d; Appendix A34). This point is further supported by the fact only developed land, disturbed habitat, and extensive agriculture exist between the project and Snow Creek (Figures 4c and 4d). These habitats are very low value habitats and consequently Snow Creek's buffer is of very low value.

In actions unrelated to the 2015 Facilities Master Plan Update, Mt. SAC will discontinue grazing along Snow Creek and plant coastal sage scrub in the area between Snow Creek and Parking Lot M, creating a natural buffer on the east side of the creek up at least 145 feet wide and in the area between the creek and North Grand Avenue. This will significantly improve the habitat quality of the creek's buffer.

Comment 5-2.11. "Mitigation Measure BIO-08 on Page 7 of the MMP has been revised to state "[p]ermanent development adjacent to any future wetland mitigation areas shall incorporate a 100-foot buffer during final project design. If un-vegetated, the buffer shall be planted with non-invasive species that are compatible with the adjacent wetland mitigation area habitat. A qualified biologist shall review the final landscape plans for the buffer area to conform that no species on the California Invasive Council (Cal-IPC) list are present in the plan."

Response 5.2.11. See response 5-2.10. No additional response from the District is required.

Comment 5-2.12. "The Fish and Game Commission Policy on the Retention of Wetland Acreage and Habitat Values states, "[b]uffers should be of sufficient width and should be designed to eliminate potential disturbance of fish and wildlife resources from noise, human activity, feral animal intrusion, and any other potential sources of disturbance." The USACE suggest that narrow strips of 100 feet may be adequate to provide many of the functions cited above (USACE 1991). Wetland buffers should be measured starting at the outside edge of the wetland habitat (rather than the watercourse/streambed centerline). Moreover, previous studies of upland buffers used to protect and maintain functions of wetlands have concluded that, "[b]uffers of less than 50 feet were [found to be] more susceptible to degradation by human disturbance. In fact, no buffers of 25 feet or less were functioning to reduce disturbance to the adjacent wetlands" (McElfish et al 2008). CDFW recommends that a minimum 100-foot buffer be provided for all on-site wetlands (including proposed mitigation areas) and that the buffer be measured from the outside edge of the wetland habitat to reduce direct and indirect wetland impacts to a level of less than significant. Appropriate passive uses (e.g., trails, fuel clearing) may be acceptable on the outer limits of the buffer (e.g., last 15 feet) if appropriately located/managed and no sensitive species are known to utilize the wetland areas."

Response 5.2.12. The comment that CDFW recommends a "minimum 100-foot buffer be provided for all on site wetlands" is noted. The Fire Training Academy impact area is over 500 feet from Snow Creek and will not affect the area specified in this comment. In a previously approved project (2012 Master Plan Update), the buffer along Snow Creek will exceed the minimum specified by the CDFW. See Responses 5.2.10, 5.2.13.

Comment 5-2.13. "Mitigation Measure B10-11 on Page 8 of the MMP states "[a] 25-foot buffer shall be incorporated into the project design for the Fire Training Academy to protect future wetland mitigation areas along Snow Creek." As indicated above, the proposed 25-foot buffer would not be adequate to protect the current and long-term functions of the adjacent wetland habitat. Furthermore, it is unclear exactly what type of activities will take place at this academy, such as the use of water and fire retardant chemicals for related activities. For these reasons, CDFW recommends that a minimum 100-foot buffer be provided for the buffer adjacent to the

Fire Training Academy and that the buffer be measured from the outside edge of the wetland habitat to reduce direct and indirect wetland impacts to a level of less than significant.”

Response 5.2.13. The comment that CDFW recommends a “minimum 100-foot buffer adjacent to the Fire Training Academy and that the buffer be measured from the outside edge of the wetland habitat“ is noted.

While the final location for the Academy within this parking lot will be subject to additional CEQA review when a site-specific site plan is finalized and the uses are known, it will be over 100 feet from the creek. This response is based on the parking lot shown in Figure 4c (Appendix A33).

Mitigation Measure BIO-08 in the 2016 MMP is hereby revised to be consistent with other Responses.

BIO-08. Permanent development adjacent to any future wetland mitigation areas shall incorporate a 100-foot buffer during final project design. If un-vegetated, the buffer shall be planted with non- invasive species that are compatible with the adjacent wetland mitigation area habitat. A qualified biologist shall review the final landscape plans for the buffer area to conform that no species on the California Invasive Plan Council (Cal-IPC) list are present in the plan. Facilities Planning & Management shall monitor compliance.

Comment 5-2.14. “The SEIR concludes that “the scrub does not qualify as jurisdictional wetland because it occurs within a constructed basin fed by pipes and a riprap drainage channel. It is a stormwater facility, not a lake or stream.”

CDFW has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the Project applicant (or "entity") must provide written notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, CDFW then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. CDFW's issuance of an LSA Agreement is a project subject to CEQA. To facilitate issuance of a LSA Agreement, the final SEIR 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 LSA Agreement. Early consultation is recommended, since modification of the Project may be required to avoid or reduce impacts to state fish and wildlife resources. Lack of such analysis in the final SEIR could preclude CDFW from relying on the Lead Agency's analysis to issue a LSA Agreement without CDFW first conducting its own, separate Lead Agency subsequent or supplemental analysis for the Project.

CDFW staff conducted a site visit with Mt. SAC and HELIX on August 5, 2016. Based on the inspection of the constructed basin, CDFW recommends the applicant notify CDFW prior to the final SEIR to ensure all Project impacts and mitigation measures are incorporated into the Mitigation Monitoring and Reporting Plan for the Project.”

Response 5.2.14. As discussed during the August 5, 2016 meeting, Mt. SAC will submit a Notification of Lake or Streambed Alteration for unavoidable impacts to the constructed basin. The submittal of this notification will be prior to October 1, 2016.

At this meeting, Mt. SAC also confirmed that the existing basin will simply be replaced with a new basin in the same location and of similar type and function. Mt. SAC also discussed a proposal to incorporate mule fat, and potentially other native plant species, into the plant palette for the new basin as a project design feature, thereby compensating impacts on mule fat scrub habitat, which are not substantial or adverse. Revegetated portions of the new basin would be subject to inspection and monitoring during the establishment period as part of the long-term management tasks on the campus. Additional information will be provided in Mt. SAC’s notification.

Comment 5-2.15. “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 [Public Resources Code, § 21003, subdivision (e)]. Accordingly, CDFW recommends that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <http://www.dfq.ca.gov/bioqeodata/cnddb/pdfs/CNDDDBFieldSurveyForm.pdf>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDBwildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: [http://www.dfq.ca.gov/bioqeodata/cnddb/plants and animals.asp](http://www.dfq.ca.gov/bioqeodata/cnddb/plants%20and%20animals.asp).”

Response 5.2.15. The CDFW recommendation that special status species and natural communities on campus be reported to the CNDDDB is noted. The college will comply with this request within six months of final SEIR certification. .

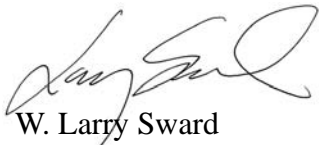
Comment 5-2.16. “Based on the information contained in the SEIR, the Project, as currently proposed, would have an impact on state fish and/or wildlife, and an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (California Code Regulations, Title 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089.)”

Ms. Mikaela Klein
August 24, 2016

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Response 5.2.16. The District is filing the Notice of Determination and paying all applicable fees, including the CDFW fees.

Sincerely,



W. Larry Sward
Principal Biologist

c: Sid Lindmark (via email)
Sean Absher (via email)