



5.3 Biological Resources



5.3 BIOLOGICAL RESOURCES

This section describes the existing biological resources on-site and the potential adverse impacts associated with implementation of the Project. An analysis of compliance with all Federal, State, and local regulations and policies regarding biological resources has also been conducted. This section is primarily based upon the *Biological Technical Report for the California Grand Village Project* (Biological Technical Report), prepared by Carlson Strategic Land Solutions, dated September 2018 and the *California Grand Village Azusa Greens Arborist Report* (Arborist Report), prepared by Dudek, dated August 2018; refer to [Appendix 11.3, *Biological Technical Report*](#).

5.3.1 EXISTING SETTING

The Site encompasses existing golf holes 3, 4, 5, and 6 of the Azusa Greens Country Club and is fully developed as a golf course with mostly vegetative cover, grass fairways, several sand traps, and ornamental trees and lighting lining both sides of each fairway; refer to [Exhibit 3-2, *Site Vicinity*](#). Golf course netting and larger ornamental trees are also located along the Site perimeter to protect adjacent uses from stray golf balls. No water features are present on this portion of the golf course. A single concrete block restroom structure is located between the north/south holes (holes 3 and 6) and the east/west holes (holes 4 and 5). Concrete paved golf cart paths are provided along the fairways adjacent to North Todd Avenue, 10th Street, and Rain Bird Corporation.

Surrounding land uses include a mixture of light industrial and residential development. The 4.48-acre Specific Plan Area is bounded by West Sierra Madre Avenue, Azusa Greens Country Club, and attached single-family residences (Rancho Azusa) to the north; light industrial uses (Rain Bird Corporation) to the east; and North Todd Avenue and light industrial uses (Colorama Wholesale Nursery) to the west. The 14.88-acre Golf Course Reconfiguration Area is bounded by light industrial uses (Rain Bird Corporation), and multi-family residential uses (Le Med Apartment Homes) to the north; attached single-family residences (Sierra Village) to the east; 10th Street and light industrial uses to the south; and North Todd Avenue and light industrial uses (Lagunitas Brewing Company) to the west.

VEGETATION AND WILDLIFE

A field survey was performed on May 23, 2017 to assess and map vegetation types, plants and wildlife, and to identify habitat areas that could be suitable for special-status species, including annual plants with different seasonal blooming periods.

Plant species were identified using plant field and taxonomical guides and recorded in field notes. Aerial photographs and maps were used to assist in the delineation of plant community boundaries. Following the field survey, boundaries for the various plant communities were digitized and a vegetation map was created.

General wildlife surveys were conducted on foot and with binoculars within the study area, which is within the general distributional range of several special-status terrestrial species although most are not subject to specific published survey protocols. All wildlife species encountered visually, audibly or via diagnostic signs (e.g., tracks, burrows, nests, scat, remains) were identified and recorded in field notes. Wildlife field guides were used to assist with identification of species. Photographs were



taken to document existing conditions within the study area; refer to Appendix B of the Biological Technical Report.

Vegetation Communities

Three vegetation communities were identified within the study area, as detailed in [Table 5.3-1, *Vegetation Communities*](#), and illustrated on Biological Technical Report Figure 5, *Vegetation Map*. A general description of the three vegetation communities observed during the field survey are provided below.

Table 5.3-1
Vegetation Communities

Vegetation Community	Total Acreage
Ornamental	2.44
Golf Course	13.0
Developed/Disturbed	3.92
Total	19.36
Source: Carlson Strategic Land Solutions, <i>Biological Technical Report for the California Grand Village Project</i> , September 2018; refer to Appendix 11.3 .	

ORNAMENTAL

A total of 2.44 acres of ornamental habitat were observed and mapped on-site. The ornamental habitat type is dominated by pines (*Pinus spp.*), eucalyptus (*Eucalyptus spp.*), Canary Island pine (*Pinus canariensis*), western sycamore (*Plantus racemosa*), Mexican fan palm (*Washingtonia robusta*), and Brazilian pepper (*Schinus terebinthifolius*). Portions of the ornamental habitat type are disturbed with bare soil and invasive weeds such as tree tobacco (*Nicotiana glauca*) and castor bean (*Ricinus communis*). Ornamental trees line both sides of each fairway and is used as protection of errant golf balls to the golf fairways and surrounding land uses. The ornamental vegetation is non-native, and some of it is considered invasive. The ornamental vegetation provides limited habitat value and is not considered a sensitive vegetation community.

Ornamental landscaping or buildings may potentially provide habitat for special-status bat and avian species. The ornamental species and buildings found on-site do not provide large enough substrate to function as a roosting site for the sensitive Pallid bat (*Antrozous pallidus*) and big free-tailed bat (*Nyctinomops macrotis*) species known to potentially occur in the Site vicinity. Furthermore, the ornamental landscaping and buildings do not provide deep crevices the bat species often roost in. The large trees may provide nesting habitat to the more common avian species accustomed to urbanized settings. The existing golf usage may deter the avian species from nesting in the trees.

GOLF COURSE

A total of 13.0 acres of golf course was observed and mapped on-site. The golf course is dominated by Kentucky bluegrass (*Poa pratensis*), along with several other non-native grass species, and eucalyptus and pine trees between the fairways. The golf course fairways provide little to no habitat



for native animal species. Paved golf cart paths are also included within the acreage mapped on-site. The golf course community within the Site is not considered a sensitive vegetation community.

DEVELOPED/DISTURBED

Approximately 3.92 acres of disturbed area consisting of bare dirt and sparse vegetation are mapped on-site. A single concrete block restroom structure and a portion of the golf cart path are included within this acreage.

Tree Survey

An inventory of the tree species and health within the Site was conducted to determine the current baseline condition of the type and health of tree species on-site. The Arborist Report details all tree species and corresponding health conditions and is included as Appendix A of the Biological Technical Report. Dudek's arborist surveyed the Site on foot by walking methodically across the property. Any inaccessible or restricted areas were surveyed using binoculars. The trees were evaluated for health and structural condition of the trunk and canopy and trunk diameters were measured using diameter tape.

The tree survey identified a total of 601 trees on-site, of which 554 trees had a measured diameter at breast height of six inches or greater, which qualifies those trees to be protected under the City of Azusa Tree Preservation and Protection Ordinance. The tree species observed on-site are comprised of 23 individual tree species and include both native species and non-native ornamental species; refer to [Exhibit 5.2-2, Proposed Tree Plan](#). These species are not candidates for relocation.

Most of the individually mapped trees, 76.7 percent (461 trees) exhibit fair health condition; 15.1 percent (91 trees) are in poor health condition; 3.0 percent (18 trees) are in good health; and 4.0 percent (24 trees) are dead. Structurally, 0.2 percent (one tree) exhibits good structure; 63.7 percent (383 trees) has fair structure; 32.1 percent (193 trees) exhibit poor structure; and 4.0 percent (24 trees) are dead. The high percentage of structurally poor trees is directly attributed to overhead utility maintenance and the practice of tree topping to maintain lower canopies. A complete list of tree species and condition of the tree species can be found in the Appendix A of the Biological Technical Report.

Wildlife Species

Common wildlife species observed during the field survey included American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), California towhee (*Melospiza crissalis*), house finch (*Haemorrhous mexicanus*), mourning dove (*Zenaidura macroura*), lesser goldfinch (*Spinus psaltria*), black phoebe (*Sayornis nigricans*), and California ground squirrel (*Spermophilus beecheyi*).

MIGRATORY CORRIDORS AND LINKAGES

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are like linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is



possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

Due to the urbanized Site vicinity, the Site does not serve as a local wildlife corridor and is not located within any local or regional designated migratory corridors or linkages. The closest designated wildlife movement corridor is the San Gabriel Canyon Significant Ecological Area (SEA) designated by the County of Los Angeles, which includes the San Gabriel River to the west of the Site. The San Gabriel River has the potential to provide wildlife movement opportunities along the riparian corridor from the mountains to the valley floor. However, the Site is approximately 0.4 miles east of this SEA and separated by North Todd Avenue and industrial uses to the west.

JURISDICTIONAL RESOURCES

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The United States Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredge or fill materials into “waters of the United States” pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the California Department of Fish and Wildlife (CDFW) regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Water Quality Control Board (RWQCB) regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

Prior to the field investigation, historical aerial imagery and topography of the study area was reviewed to determine the potential for perennial, intermittent, or ephemeral drainages and associated riparian resources. Generally, indicators of jurisdictional drainages on an aerial photo include vegetation and/or incised lines indicating the path of flowing water. A field survey was also conducted on May 23, 2017 to determine the presence of any jurisdictional features. All depressions and drainages were evaluated for the presence of jurisdictional waters and wetlands according to the USACE and CDFW delineation guidelines, including connectivity or lack of connectivity to Traditional Navigable Waters.

Based on the collective results of the desktop investigation and field survey, it was determined that no water features are present on this portion of the golf course and the Site does not include any jurisdictional drainages or wetland features that could be considered jurisdictional by the USACE, CDFW, or RWQCB.

SPECIAL-STATUS SPECIES

As part of the Biological Technical Report, available literature and databases were reviewed to identify sensitive habitats and special-status plant and wildlife species that have the potential to occur within the Project vicinity. Primary data sources reviewed to evaluate the occurrence potential of special-status resources on-site included: the California Natural Diversity Database (CNDDDB); the California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants of California* for the United States Geological Survey (USGS) 7.5-minute Azusa quadrangle map; United States Fish and Wildlife Services (USFWS) critical habitats maps; and pertinent maps, scientific literature, websites, and regional flora and fauna field guides.



Special-Status Plant Species

Sensitive plant species include Federal- or State-listed threatened or endangered species or those species listed on the CNPS rare and endangered plant inventory. Two listed plant species occur within the USGS 7.5-minute Azusa quadrangle and are detailed in [Table 5.3-2, *Special-Status Plant Species Known in the Site Vicinity*](#).

**Table 5.3-2
Special-Status Plant Species Known in the Site Vicinity**

Common and Scientific Name	Status			Habitat Requirements	Occurrence Potential
	Federal	State	CNPS		
Braunton's milk-vetch <i>Astragalus brauntonii</i>	FE	--	1B	Recently burned and disturbed areas, usually sandstone with carbonate layers; 1,000-foot elevation range; blooms from January to August	Not Expected: Suitable habitat not present.
Slender-horned spineflower <i>Dodecahema leptoceras</i>	FE	CE	1B	Sandy habitats, such as chaparral, coastal scrub (alluvial fan), and cismontane woodland; 2,100-foot elevation range; booms from April to June.	Not Expected: Suitable habitat not present.
Notes: FEDERAL FE: Federally Endangered FT: Federally Threatened Species FPE: Federally Proposed Endangered FPT: Federally Proposed Threatened FC: Federal Candidate Species FSC: Federal Species of Concern STATE CE: State Endangered CT: State Threatened CR: State Rare CNPS List 1A: Plants presumed extinct in California. List 1B: Plants rare and endangered in California and elsewhere. List 2: Plants rare and endangered in California, but more common elsewhere. List 3: Taxa about which more information is needed. List 4: Plants of limited distribution.					
Source: Carlson Strategic Land Solutions, <i>Biological Technical Report for the California Grand Village Project</i> , September 2018; refer to Appendix 11.3 .					

No special-status plant species were observed within the Site during the field survey. Due to the built nature of the Site and lack of suitable habitat and soils, there is no opportunity for these special-status plant species to occur.

Special-Status Wildlife Species

Sensitive wildlife species with the potential to occur in the study area were analyzed based on the species identified in the USGS 7.5-minute Azusa quadrangle and the surrounding eight quadrangles, distribution, habitat requirements, and existing Site conditions. No special-status wildlife species were identified through the CNDDDB as being observed within the Site. However, the following species identified in [Table 5.3-3, *Special-Status Wildlife Species Known in the Site Vicinity*](#), were identified as being observed within two miles of the Site.



**Table 5.3-3
Special-Status Wildlife Species Known in the Site Vicinity**

Common and Scientific Name	Status		Habitat Requirements	Occurrence Potential
	Federal	State		
Reptiles				
Two-striped gartersnake <i>Thamnophis hammondi</i>	--	CSC	Pools, creeks, cattle tanks, and other water sources; rock areas, such as oak woodlands, chaparral, brushland, and coniferous forests.	Not Expected: No suitable habitat present.
Amphibians				
Coast range newt <i>Taricha torosa</i>	--	CSC	Wet forests, oak forests, chaparral, and rolling grasslands.	Not Expected: No suitable habitat present.
Fish				
Santa Ana sucker <i>Catostomus santaanae</i>	FT	--	Permanent streams with coarse, gravel rubble, and boulders with growths of filamentous algae.	Not Expected: No suitable habitat present.
Birds				
California coastal gnatcatcher <i>Poliophtila californica</i>	FT	CSC	Coastal sage scrub in areas of flat or gently sloping terrain.	Not Expected: Suitable habitat not present.
Least Bell's vireo <i>Vireo bellii pusillus</i>	FE	CE	Willow dominated riparian habitat with dense understory.	Not expected: Suitable habitat not present.
Mammals				
Pallid bat <i>Antrozous pallidus</i>	--	CSC	Arid habitats, including grasslands, shrublands, woodlands, and forests; prefers rocky outcrops, cliffs, and crevices with access to open habitats for foraging.	Not Expected: Suitable habitat not present.
Big free-tailed bat <i>Nyctinomops macrotis</i>	--	CSC	Rugged, rocky terrain; forest and deserts.	Not Expected: Suitable habitat not present.
Notes:				
FEDERAL		STATE		
FE:	Federally Endangered	CE:	California Endangered	
FT:	Federally Threatened	CT:	California Threatened	
FPE:	Federally Proposed Endangered	CCE:	California Candidate (Endangered)	
FPT:	Federally Proposed Threatened	CCT:	California Candidate (Threatened)	
FC:	Federal Candidate for listing as threatened or endangered	CFP:	California Fully Protected	
FSC:	Federal Species of Concern- no formal protection is granted to this designation	CP:	California Fully Protected	
MNBMC:	Migratory Nongame Birds of Management Concern	CSC:	California Species of Special Concern	
		◆	California Special-animal	
Source: Carlson Strategic Land Solutions, <i>Biological Technical Report for the California Grand Village Project</i> , September 2018; refer to Appendix 11.3 .				

None of these species or evidence of their presence were observed or heard during the field survey. Given the Site's built and urbanized environment, existing golf play, and lack of habitat, there is no opportunity for them to occur on-site.



Critical Habitat

The Site contains no designated critical habitat. The closest designated critical habitat is located 0.25-mile northwest of the Site for the southwestern willow flycatcher (*Empidonax traillii extimus*).

5.3.2 REGULATORY SETTING

Threatened and endangered species are listed by the USFWS and CDFW. In California, three agencies generally regulate activities within inland streams, wetlands, and riparian areas: the USACE; CDFW; and RWQCB. The USACE Regulatory Branch regulates activities pursuant to Section 404 of the CWA and Section 10 of the Rivers and Harbors Act. The CDFW regulates activities under CDFW Code Sections 1600-1607. The RWQCB regulates activities pursuant to Section 401 of the CWA and the California Porter-Cologne Act.

FEDERAL LEVEL

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 is intended to protect plants and animals that have been identified as being at risk of extinction and classified as either threatened or endangered. FESA also regulates the “taking” of any endangered fish or wildlife species, per Section 9 of the Act. A responsible agency or individual landowners are required to submit to a formal consultation with the USFWS to assess potential impacts to listed species as the result of a development project, pursuant to FESA Sections 7 and 10. The USFWS is required to make a determination as to the extent of impact to a particular species a project would have. If it is determined that potential impacts to a species would likely occur, measures to avoid or reduce such impacts must be identified.

Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act (16 U.S.C. Sections 661-667e) requires that whenever waters or channel of a stream or other body of water are proposed or authorized to be modified by a public or private agency under a Federal license or permit, the Federal agency must first consult with the USFWS and/or National Oceanic and Atmospheric Administration Fisheries and with the head of the agency exercising administration over the wildlife resources of the state where construction would occur (in this case the CDFW), with a view to conservation of birds, fish, mammals, and all other classes of wild animals and all types of aquatic and land vegetation upon which wildlife is dependent.

Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act (MBTA) implements various treaties for the protection of migratory birds. Under the MBTA, taking, killing, or possessing migratory birds is unlawful. Unless permitted by regulations, the MBTA provides that it is unlawful to pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product,



manufactured or not. The MBTA protects the nests of all native bird species, including common species, such as mourning dove, Anna’s hummingbird, and common yellowthroat.

The Bald Eagle Protection Act (16 U.S.C. 668) was passed in 1940 to protect bald eagles and was later amended to include golden eagles. Under the act, it is unlawful to import, export, take, sell, purchase, or barter any bald eagle or golden eagle, their parts, products, nests, or eggs. Take includes pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing eagles.

Federal Clean Water Act

SECTION 404

The USACE maintains regulatory authority over the discharge of dredged or fill material into the waters of the United States, pursuant to Section 404 of the CWA. The USACE and U.S. Environmental Protection Agency (EPA) define “fill material” as any “material placed in waters of the United States where the material has the effect of: (i) Replacing any portion of a water of the United States with dry land; or (ii) Changing the bottom elevation of any portion of the waters of the United States.” Fill material may include sand, rock, clay, construction debris, wood chips, or other similar “materials used to create any structure or infrastructure in the waters of the United States.” The term “waters of the United States” includes the following:

- All waters that have, are, or may be used in interstate or foreign commerce (including sightseeing or hunting), including all waters subject to the ebb and flow of the tide;
- Wetlands;
- All waters such as interstate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce;
- All impoundments of water mentioned above;
- All tributaries of waters mentioned above;
- Territorial seas; and
- All wetlands adjacent to the waters mentioned above.

In the absence of wetlands, the USACE’s jurisdiction in non-tidal waters extends to the Ordinary High Water Mark, which is defined as “...that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area (33 CFR 328.3(e)).”



Wetlands generally include swamps, marshes, bogs, and similar areas. Wetlands are jointly defined by the USACE and EPA as *“those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (33 CFR 328.3(b)).”*

It is important to note, relative to USACE Section 404 jurisdiction, that on August 16, 2018 the District Court for South Carolina issued a nationwide injunction against the Trump Administration regulation suspending the June 29, 2015 definition of “waters of the United States” Rule (Clean Water Rule). This ruling reinstated the Clean Water Rule in the 26 states where district courts had not previously enjoined that rule, which included California. The Clean Water Rule does not affect the jurisdiction of other agencies. Subsequently, “waters of the United States” were reevaluated in the Biological Technical Report based on this court ruling and there are no changes to the prior conclusions.

SECTION 401

The RWQCB is the primary agency responsible for protecting water quality in California. The RWQCB regulates discharges to surface waters under the Federal CWA and the California Porter-Cologne Water Quality Control Act. The RWQCB’s jurisdiction extends to all waters of the State and to all waters of the United States, including wetlands (isolated and non-isolated conditions). Through 401 Certification, Section 401 of the CWA allows the RWQCB to regulate any proposed Federally-permitted activity that may affect water quality. Such activities include the discharge of dredged or fill material, as permitted by the USACE, pursuant to Section 404 of the CWA. The RWQCB is required to provide “certification that there is reasonable assurance that an activity which may result in the discharge to waters of the United States will not violate water quality standards,” pursuant to Section 401. Water Quality Certification must be based on the finding that proposed discharge will comply with applicable water quality standards, which are given as objectives in each of the RWQCB’s Basin Plans.

In addition, pursuant to the Porter-Cologne Water Quality Control Act, the State is given authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. As such, any person proposing to discharge waste into a water body that could affect its water quality must first file a Report of Waste Discharge if a Section 404 does not apply. “Waste” is partially defined as any waste substance associated with human habitation, including fill material discharged into water bodies.

STATE LEVEL

California Endangered Species Act

The California Endangered Species Act (CESA) of 1984, in combination with the California Native Plant Protection Act of 1977, regulates the listing and take of plant and animal species designated as endangered, threatened, or rare within the State (Sections 2074.2 and 2075.5 of the Fish and Wildlife Code). The State of California also lists Species of Special Concern based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. The CDFW is given the responsibility by the State to assess development projects for their potential to impact listed species and their habitats. State listed special-status species are also addressed through the issuance of a 2081 permit (Memorandum of Understanding).



California Department of Fish and Game Code

Within the State of California, fish, wildlife, and native plant resources are protected and managed by the CDFW. The CDFW is responsible for issuing permits for the take or possession of protected species. The following sections of the Fish and Wildlife Code address the protected species: Section 3511 (birds); Section 4700 (mammals); Section 5050 (reptiles and amphibians); and, Section 5515 (fish).

California Department of Fish and Wildlife Lake and Streambed Alteration Agreements

Section 1602 of the Fish and Wildlife Code requires any person, state, or local governmental agency, or public utility to notify the CDFW before commencing any activity that would result in one or more of the following:

- Substantially obstruct or divert the natural flow of a river, stream, or lake;
- Substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or
- Deposit debris, waste, or other material that could pass into any river, stream, or lake.

Fish and Wildlife Code Section 1602 applies to all perennial, intermittent, ephemeral, and episodic rivers, streams, and lakes within the State of California. While the jurisdictional limits are similar to the limits defined by USACE regulations, CDFW jurisdiction includes riparian habitat supported by a river, stream, or lake with or without the presence or absence of saturated soil conditions or hydric soils. CDFW jurisdiction generally includes to the top of bank of the stream, or to the outer limit of the adjacent riparian vegetation (outer drip line), whichever is greater. Any project that occurs within or in the vicinity of a river, stream, lake, or their tributaries typically requires notification of the CDFW, including rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life, and watercourses having a surface or subsurface flow that supports or has supported riparian vegetation.

California Native Plant Society

The CNPS publishes and maintains an *Inventory of Rare and Endangered Vascular Plants of California* (Inventory) in both hard copy and electronic version. The Inventory assigns plants to the following categories:

- 1A – Presumed extinct in California and either rare or extinct elsewhere;
- 1B – Rare, threatened, or endangered in California and elsewhere;
- 2A – Presumed extirpated in California, but common elsewhere;
- 2B – Rare, threatened, or endangered in California, but more common elsewhere;
- 3 – Plants for which more information is needed; and
- 4 – Plants of limited distribution.

Additional endangerment codes are assigned to each taxa as follows:



- 0.1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat);
- 0.2 – Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat); and
- 0.3 – Not very threatened in California (<20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).

Plants on Lists 1A, 1B, 2A, 2B, and 3 of the CNPS Inventory consist of plants that may qualify for listing and are given special consideration under CEQA during project review. Although plants on List 4 have little or no protection under CEQA, they are usually included in the project review for completeness.

Sensitive Vegetation Communities

Sensitive vegetation communities are natural communities and habitats that are either unique, of relatively limited distribution in the region, or of particularly high wildlife value. These resources have been defined by Federal, State, and local conservation plans, policies, or regulations. The CDFW ranks sensitive communities as “threatened” or “endangered” and keeps records of their occurrences in its CNDDDB. Sensitive vegetation communities are also identified by CDFW on its Natural Communities List recognized by the CNDDDB. Impacts to sensitive natural communities and habitats identified in local or regional plans, policies, and regulations, or by Federal or State agencies, must be considered and evaluated under CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

Fully Protected Species and Species of Special Concern

The classification of “fully protected” was the CDFW’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibian and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Wildlife Code sections (fish at Section 5515, amphibian and reptiles at Section 5050, birds at Section 3511, and mammals at Section 4700) dealing with “fully protected” species states that these species “. . . may not be taken or possessed at any time. No provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take a fully protected (species),” although take may be authorized for necessary scientific research. This language makes the “fully protected” designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with fully protected species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

Species of special concern are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional



information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under CEQA during project review.

California Environmental Quality Act

In addition to specific Federal and State statutes for the protection of threatened and endangered species, *CEQA Guidelines* Section 15380(b) provides that a species not listed on the Federal or State list of protected species may be considered rare or endangered if it can be shown that the species meets certain specified criteria. Modeled after definitions in the FESA and the section of the California Fish and Wildlife Code dealing with rare or endangered plants and animals, these criteria are given in *CEQA Guidelines* Section 15380(b). The effect of Section 15380(b) is to require public agencies to undertake reviews to determine if projects would result in significant effects on species not listed by either the USFWS or CDFW (i.e., candidate species). Through this process, agencies are provided with the authority to protect additional species from the potential impacts of a project until the appropriate government agencies have an opportunity to designate the species as protected, if deemed appropriate.

LOCAL LEVEL

City of Azusa General Plan

The *City of Azusa General Plan* (General Plan) Open Space and Biological Resources Element emphasizes the City's stewardship of the City's natural resources. The element includes goals and policies related to preserving the City's natural plant and animal habitats; restoring its fisheries and aquatic habitats; and reducing conflicts between wildlife and people. The following goals and policies are applicable to the Project:

GOALS AND POLICIES

Goal 1 – Preserve, restore, and enhance the diversity of biological resources in the City's undeveloped hillsides, canyons, floodplains, and urban areas.

Policy 1.3: Strive for the long-term maintenance of all native wildlife species living in the City and the Sphere of Influence including common and sensitive species.

IMPLEMENTATION PROGRAMS

OS5 Biological Resources Background Reports. Require all applicants for development to prepare a Biological Resources Background Report prior to application submittal for all projects that are proposed within natural areas and vacant rural areas. Applicants shall demonstrate to the City that project planning and design considers, avoids, and minimizes impacts to biological resources including common and sensitive species and habitats.



City of Azusa Municipal Code

The *City of Azusa Municipal and Development Code* (Municipal Code) includes the following provisions related to the protection of natural resources within the City's limits.

- Article VI, Tree Preservation – The City's tree preservation ordinance ensures the proper care, maintenance, and preservation of trees in Azusa. Section 62-196, *Tree Removal*, requires any removal of city parkway trees to be approved by the Director of Public Works, and Section 62-197, *General requirements for new subdivisions*, details requirements related to existing tree preservation.
- Section 88.34.040, Landscape and Irrigation Plans – Requires the submittal of a Preliminary and Final Landscape Plan that complies with the required content described in Section 88.34.040(c).
- Section 88.34.060, Landscape Standards – Provides standards for landscaping design related to plant selection and grouping, plant materials, and irrigation system requirements.

5.3.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

Appendix G of the *CEQA Guidelines* contains the Environmental Checklist form that was used during the preparation of this EIR. Accordingly, a project may create a significant adverse environmental impact if it would:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services (refer to Impact Statement BIO-1);
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services (refer to Section 8.0, Effects Found Not To Be Significant);
- c) Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (refer to Section 8.0);
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (refer to Impact Statement BIO-2);
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (refer to Impact Statement BIO-3); and/or



- f) Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (refer to Section 8.0).

CEQA Guidelines Section 15065(a), *Mandatory Findings of Significance*, states that a project may have a significant effect on the environment if it would have “the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species ...”

An evaluation of whether an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would substantially diminish, or result in the loss of, an important biological resource or those that would obviously conflict with local, State, or Federal resource conservation plans, goals, or regulations. Impacts are sometimes locally adverse but not significant because, although they would result in an adverse alteration of existing conditions, they would not substantially diminish or result in the permanent loss of an important resource on a population- or region-wide basis.

CEQA Guidelines Section 15380, *Endangered, Rare or Threatened Species*, states that a lead agency can consider a non-listed species to be Rare, Threatened, or Endangered for the purposes of CEQA if the species can be shown to meet the criteria in the definition of Rare, Threatened, or Endangered. For the purposes of this discussion, the current scientific knowledge on the population size and distribution for each special-status species was considered according to the definitions for Rare, Threatened, and Endangered listed in *CEQA Guidelines* Section 15380.

Based on these standards, the effects of the Project have been categorized as either a “less than significant impact” or a “potentially significant impact.” Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

5.3.4 IMPACTS AND MITIGATION MEASURES

SPECIAL-STATUS PLANT AND WILDLIFE SPECIES

BIO-1 Would the Project have an adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status?

Impact Analysis:

VEGETATION COMMUNITIES/HABITAT

As shown in Table 5.3-4, *Project Impacts to Vegetation Communities On-site*, Project implementation would result in permanent and temporary impacts to the ornamental, golf course, and developed/disturbed vegetation communities on-site. The Project would permanently impact 4.48 acres of vegetation in the Specific Plan Area for development of the Senior Village and would temporarily impact 5.82 acres in the Golf Course Reconfiguration Area for grading and



reconfiguration of the golf course. However, these impacts are not considered significant as these vegetation communities are not considered sensitive habitats. As such, no impacts would occur in this regard.

Table 5.3-4
Project Impacts to Vegetation Communities On-site

Vegetation Community	Existing Vegetation On-site (acres)	Total Permanent Impacts (acres)	Total Temporary Impacts (acres)
Ornamental	2.44	0.56	0.34
Golf Course	13.0	3.87	3.20
Developed/Disturbed	3.92	0.05	2.28
Total	19.36	4.48	5.82

Source: Carlson Strategic Land Solutions, *Biological Technical Report for the California Grand Village Project*, September 2018; refer to [Appendix 11.3](#).

SPECIAL-STATUS PLANT SPECIES

Table 5.3-2 lists two special-status plant species that have been recorded in the CNDDDB and CNPS in the Azusa USGS 7.5-minute quadrangle. However, no special-status plant species were detected on-site during the reconnaissance survey and none are expected due to the lack of suitable habitat. Thus, development of the proposed Specific Plan and reconfiguration of the golf course would not eliminate habitat for potentially occurring special-status plant species, nor reduce population size of sensitive plant species below self-sustaining levels on a local or regional basis. As such, no impacts would occur to special-status plant species.

SPECIAL-STATUS WILDLIFE SPECIES

Several special-status wildlife species are known to occur in the Site vicinity; refer to Table 5.3-3. However, no special-status wildlife species were directly observed on-site, and all are presumed to be absent from the Site based on habitat requirements, availability, and quality of habitat needed by each species and known distributions. As such, no impacts would occur to special-status wildlife species.

CRITICAL HABITAT

There are no designated critical habitats on-site. The closest designated critical habitat is 0.25-mile northwest of the Site for the southwestern willow flycatcher. Thus, Project development would have no impact to critical habitats.

Standard Conditions of Approval: No standard conditions of approval are applicable.

Mitigation Measures: No mitigation measures are required.

Level of Significance: No Impact.



WILDLIFE CORRIDORS

BIO-2 Would the Project interfere with the movement of a native resident or migratory species?

Impact Analysis: Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas and allows for breeding, and foraging. The Site is surrounded by existing development and is not located within any local or regional designated migratory corridors or linkages. As detailed in the Biological Technical Report, the Site does not function as a wildlife corridor due to the urbanized nature of the Site. The San Gabriel River to the west of the Site is considered a wildlife movement corridor and is associated with the Los Angeles County San Gabriel SEA. However, the San Gabriel River is approximately 0.4-mile to the west and separated from the Site by North Todd Avenue and industrial uses. Therefore, Project implementation would not impact the San Gabriel River and is not expected to disrupt or have any adverse effects to potential wildlife movement along the river. No impacts would result in this regard.

Ornamental trees present on-site could provide potential nesting sites for several common native bird species. These potentially occurring common native birds are not protected by the FESA or CESA, however many native species are protected under the MBTA, Bald and Golden Eagle Protection Act, and Fish and Wildlife Code Sections 3503, 3503.5, 3511, and 3513, which prohibit take, possession, or destruction of birds, their nests or eggs (in particular, raptor species). Construction activities associated with the proposed Project could potentially impact nesting birds within the Site and within the immediate vicinity, which could result in a potentially significant impact.

Project construction could also result in short-term impacts related to disturbance of wildlife, littering, and illegal wildlife collections. However, Project compliance with Standard Condition of Approval (SCA) BIO-1 through SCA BIO-4 would reduce the potential for such indirect impacts to less than significant levels. The applicable SCAs would ensure all temporary construction-related nighttime lighting be shielded and/or directed downward to avoid indirect impacts to nocturnal wildlife; all construction contractors, subcontractors, and employees comply with the litter and pollution laws and institute a litter control/removal program; active nests shall not be removed or disturbed; and construction employees, contractors, and Site visitors be prohibited from collecting wildlife.

During Project operations, lighting, noise, and littering could result in long-term impacts related to disturbance of wildlife. However, as analyzed in Section 5.2, *Aesthetics/Light and Glare*, lighting and glare from proposed structures would be designed such that all light sources are directed away from or shielded from surrounding businesses, residences, and roadways per Specific Plan development regulations and Municipal Code Section 88.31.030, *Outdoor Lighting*. Project-related operational stationary noise sources would include mechanical equipment and outdoor activity areas. As analyzed in Section 5.11, *Noise*, Project operational noise would not introduce an intrusive noise source over existing conditions as the neighboring industrial, residential, and golf course activities produce similar operational noises. Littering associated with Project operations would be regulated by Municipal Code Chapter 58, *Solid Waste*, which establishes the frequency of solid waste collection, means of collection, transportation, level of service, charges and fees, and nature, location and extent



of solid waste handling services. The Project would be required to provide rubbish containers throughout the Senior Village and utilize the City's solid waste collection service. As such, lighting, noise, and littering are not anticipated to impact wildlife activities in the Site vicinity.

Implementation of Mitigation Measure BIO-1 would require a pre-construction nesting bird survey if construction cannot occur outside of the nesting season. The nesting season generally extends from March 1 through September 15 but can vary slightly from year to year based upon seasonal weather conditions. Some raptor species can nest as early as January. The survey would determine the presence of nests or nesting birds and shall be conducted within three days of Site disturbance. If active nests are identified, a qualified biologist shall establish non-disturbance buffers (500 feet for raptors and sensitive species, and 200 feet for others) around them and shall monitor these buffers weekly to ensure no work occurs within them until the nesting effort is finished (i.e., the juveniles have successfully fledged and are surviving independent from the nest). A negative survey would be required by a biologist prior to construction to indicate no impacts to active bird nests. Upon completion of the survey and any follow-up measures that may be required, a report shall be prepared and submitted to the City for mitigation monitoring compliance record keeping. Therefore, adherence to SCA BIO-1 through SCA BIO-4 and Mitigation Measure BIO-1 would reduce impacts related to nesting birds to a less than significant level.

Standard Conditions of Approval:

- SCA BIO-1 All temporary construction-related nighttime lighting used on-site shall be shielded and/or directed downward to avoid indirect impacts to nocturnal wildlife such that nighttime lighting could increase predation rates.
- SCA BIO-2 All construction contractors, subcontractors, and employees shall comply with the litter and pollution laws and shall institute a litter control/removal program during construction activities to reduce the attractiveness of the area to opportunistic predators such as coyotes, opossums, and common ravens.
- SCA BIO-3 Active nests (nests with chicks or eggs) shall not be removed or disturbed. Nests may be removed or disturbed by a qualified biologist, if not active.
- SCA BIO-4 Construction employees, contractors, and Site visitors shall be prohibited from collecting wildlife.

Mitigation Measures:

- BIO-1 Pursuant to the Migratory Bird Treaty Act (MBTA), Bald/Golden Eagle Protection Act, and California Fish and Wildlife Code (Sections 3503, 3503.5, 3511, and 3513), if the Project Applicant conducts all Site disturbance/vegetation removal activities (such as removal of any trees, shrubs, or any other potential nesting habitat) outside the avian nesting season, January 1 through September 15, no further action is necessary. However, if ground disturbance/vegetation removal cannot occur outside of the nesting season, a qualified biologist shall conduct a pre-construction nesting bird survey to determine the presence of nests or nesting birds within three days of the start of any ground disturbing activities. If no active nests are identified, the biologist shall document a negative survey with a brief letter report indicating that no impacts to active



bird nests would occur during Site disturbance activities. If vegetation clearing is not completed within five days of a negative survey, the nesting survey must be repeated to confirm the absence of nesting birds.

If active nests are identified, the qualified biologist shall establish non-disturbance buffers around the active nests (500-foot buffer for raptors/sensitive species and 200-foot buffers for non-raptors/non-sensitive species). The biologist shall monitor these buffers weekly to ensure no work occurs within them, until the nesting effort is finished (i.e., the juveniles have successfully fledged and are surviving independent from the nest). Work can resume within the buffers when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the non-disturbance buffer areas with implementation of a monitoring and mitigation plan to prevent any impacts while the nest(s) continue to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up measures that may be required, a monitoring report shall be prepared and submitted to the City of Azusa Community Development Department for mitigation monitoring compliance record keeping.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

TREE PRESERVATION

BIO-3 Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis: As detailed in the Arborist Report, the Site includes 601 tree specimens, of which 554 trees are protected under the City of Azusa Tree Preservation and Protection Ordinance per Municipal Code Section 62-191 through 62-201. Impacts to trees can be classified as direct or indirect. Direct impacts to trees related to Site improvements are typically the result of physical injuries or changes caused by machinery, including tree removal, root damage, soil excavation and compaction, grade changes, loss of canopy, and trunk wounds. Indirect impacts to trees are the result of changes to the Site that may cause tree decline, even when the tree is not directly injured, such as alterations to stream flow rates, diversion of groundwater flow, introduction of exotic plant species, and alterations to disturbance regimes.

Of the 554 protected on-site trees, 224 trees (approximately 40 percent) would require removal due to direct impacts; 88 (approximately 16 percent) would experience encroachment into the tree protected zone¹; 72 (approximately 13 percent) would be indirectly impacted; and 166 (approximately 30 percent) would be preserved in place with no direct impacts. Additionally, four (approximately one percent) protected trees are recommended for removal based on poor health. Indirectly impacted trees and trees in poor health are not protected under the City's Tree Preservation and Protection Ordinance; thus, Project development would directly impact or encroach on a total of 312 protected trees on-site.

Of the 312 protected trees identified as incurring direct or encroached Project-related impacts, 112 had observed health and/or structural ratings to be poor, critical, or dead (nuisance trees). These 112 nuisance trees do not require mitigation per the intent of the City's Tree Preservation and

¹ Tree protected zone is defined as the canopy dripline plus five feet or 15 feet from the trunk, whichever is greater.



Protection Ordinance. The remaining 200 impacted protected trees with good to fair health ratings proposed for removal are subject to a minimum 3:1 replacement ratio subject to the City of Azusa Director of Public Works' discretion. Replacement at a 3:1 ratio for the 200 impacted trees would result in the planting of 600 new trees. It should be noted that only two of the impacted protected trees in good or fair health are considered native or have a special status (e.g., oak trees). Further, of the 200 trees requiring mitigation, 150 trees are proposed for direct removal and 50 trees would experience encroachment. The 50 encroachment trees would experience root impacts of varying degree and may not require removal. As detailed in Mitigation Measure BIO-2, replacement trees specific on the landscape plans shall be deducted from the required 600 replacement trees to determine the net replacement requirements.

Additionally, the Arborist Report included recommendations of several tree protection measures to protect undisturbed trees that have tree protected zones within 20 feet of an active construction area. Those recommendations are included as SCA BIO-5 through SCA BIO-7. SCA BIO-5 through SCA BIO-7 detail recommended best management practices to protect undisturbed on-site trees prior to, during, and after Project-related construction occurs. Implementation of Mitigation Measure BIO-2 and SCA BIO-5 through SCA BIO-7 would ensure the Project complies with the City's Tree Preservation and Protection Ordinance. As such, impacts would be less than significant in this regard.

Standard Conditions of Approval:

SCA BIO-5 Prior to construction activities, the Project Applicant and/or construction contractor shall implement the following best management measures:

- *Fencing:* Chain-link or orange-webbing polypropylene barricade fencing, no less than four feet high with tree protection signs, shall be erected around all undisturbed trees (or tree groups). The protective fence shall be installed at the protected zone boundary of each tree (or tree group), which is defined as five feet beyond the tree canopy dripline. Tree fencing shall be placed around trees that will be adjacent to construction-related activities. An International Society of Arboriculture (ISA)-certified arborist may be required on-site if grading activities occur within the tree's protected zone. The fencing shall be secured to six-foot, heavy gauge T-bar line posts pounded into the ground a minimum of 18 inches and spaced a minimum of eight feet on-center. Fencing shall be attached to T-bar posts with minimum 14-gauge wire fastened to the top, middle, and bottom of each post. Tree protection signs shall be attached to every fourth post. The contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing shall not be removed without obtaining written authorization from the director of public works.
- *Pre-construction Meeting:* A pre-construction meeting shall be held between all construction contractors (including grading, tree removal/pruning, builders) and an ISA-certified arborist. The meeting shall focus on instructing the contractors about tree protection practices and answering any questions. All equipment operators and spotters, assistants, or those directing operators from the ground shall provide written acknowledgement of their receiving



tree protection training. This training shall include information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish damage prevention.

SCA BIO-6 During construction activities, the Project Applicant and/or construction contractor shall implement the following best management measures:

- Equipment Operation and Storage. Construction contractors shall avoid heavy equipment operation around the protected trees. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected tree zone, unless where specifically approved in writing and under the supervision of an International Society of Arboriculture (ISA)-certified arborist.
- Materials Storage and Disposal. Construction contractors shall not store or discard any supply or material, including paint, lumber, or concrete overflow, within a tree protected zone and shall remove all foreign debris within the protected zone. However, workers shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. In addition, the contractors shall avoid drainage or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (antifreeze) shall be disposed of properly. The construction contractors shall ensure that equipment be parked at least 50 feet from tree protected zones to avoid the possibility of leakage of equipment fluids into the soil.
- Grade Changes. Construction contractors shall ensure that grade changes, including adding fill, not be permitted within any tree protected zone without special written authorization and under supervision by an ISA-certified arborist. Construction workers shall ensure that grade changes made outside of any tree protected zone do not create conditions that allow water to pond at the base of the tree.
- Moving Construction Materials. Construction contractors shall ensure that care be exercised when moving construction equipment or supplies near undisturbed protected trees, especially overhead. Workers shall ensure that damage to the trees be avoided when transporting or moving construction materials and working around the trees (even outside of the fenced protected zone). Contractors shall flag aboveground tree parts that could be damaged (e.g., low limbs, scaffold branches, trunks) with high-visibility flagging, such as florescent red or orange. If contact with the tree crown is unavoidable, conflicting branches may be pruned by an ISA-certified tree worker under supervision by an ISA-certified arborist and shall adhere to ISA standards.
- Trenching. Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced tree protected zones. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a



root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. An ISA-certified arborist shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Use of root pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.

- Irrigation. Trees that have been substantially root pruned (30 percent or more of their root zone) will require irrigation for the first 12 months. First irrigation shall occur within 48 hours of root pruning. Trees shall be deep watered every two to four weeks during the summer and once a month during the winter (adjust accordingly with rainfall). One irrigation cycle should thoroughly soak the root zones of the trees to a depth of three feet. The soil should dry out between watering; a consistently wet soil shall be avoided. One person shall be designated as responsible for irrigating (deep watering) the trees. Soil moisture shall be checked with a soil probe before irrigating. Irrigation is best accomplished by installing a temporary aboveground micro-spray system that will distribute water slowly (to avoid runoff) and evenly throughout the fenced tree protection zone but never soaking the area located within six feet of the tree trunk, especially during warmer months.
- Canopy Pruning. The construction contractor shall not prune trees until all construction is completed unless standard pruning would reduce conflict between canopy and equipment. All pruning shall be conducted by an ISA-certified tree worker under supervision by an ISA-certified arborist and shall adhere to ISA pruning standards.
- Canopy Washing. During construction, the construction contractor shall wash the foliage of trees adjacent to construction activity with a strong water stream every two weeks in early hours before 10:00 a.m. to control mite and insect populations.
- Inspection. An ISA-certified arborist shall inspect the preserved trees adjacent to grading and construction activity monthly for the duration of the Project. A report summarizing Site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the ISA-certified arborist following each inspection.

SCA BIO-7 After construction activities are complete, the Project Applicant and/or construction contractor shall implement the following best management measures:

- Mulch. A four-inch mulch layer shall be provided under the canopy of trees. Mulch shall include clean, organic mulch that will provide long-term soil conditioning, soil moisture retention, and soil temperature control.
- Pruning. Pruning shall only be done to maintain clearance and remove broken, dead or diseased branches. Pruning shall only take place following a



recommendation by and performed under the supervision of an International Society of Arboriculture (ISA)-certified arborist. No more than 20 percent of the canopy shall be removed at any one time. All pruning shall conform to ISA standards.

- *Watering.* The trees should not require regular irrigation other than the 12 months following substantial root pruning, if applicable. However, soil probing may be necessary to accurately monitor moisture levels. Especially in years with low winter rainfall, supplemental irrigation for the trees that sustained root pruning and any newly planted trees may be necessary.
- *Watering Adjacent Plant Material.* All plants near the trees shall be compatible with water requirements of said trees to the extent feasible given the golf course design. The surrounding plants should be watered infrequently with deep soaks and allowed to dry out in between watering, rather than with frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet. Irrigation spray shall not hit the trunk of any tree. A 60-inch dry-zone shall be maintained around all tree trunks. An aboveground micro-spray irrigation system is recommended over typical underground pop-up sprays to the extent feasible.
- *Chemical Applications.* If the trees are maintained in a healthy state, regular spraying for insect or disease control would not be necessary. If a problem does develop, an ISA-certified arborist/licensed pest control advisor or their representative shall be consulted to determine whether application of insecticides is needed to prevent the intrusion of bark-boring beetles and other invading pests. All chemical spraying shall be performed by a licensed applicator under the direction of a licensed pest control advisor.
- *Monitoring.* An ISA-certified arborist shall inspect the trees retained on-site for a period of five years following the completion of construction activity. Monitoring visits shall be completed quarterly, totaling 20 visits. Following each monitoring visit, a report summarizing Site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted. Additionally, any tree mortality shall be noted, and any tree dying during the monitoring period shall be replaced of the same species as specified for minimum replacement standards in this arborist report.

Mitigation Measures:

BIO-2 Development of the Project would directly impact or encroach upon 200 trees with good to fair ratings, protected under the City of Azusa Tree Preservation and Protection Ordinance. To mitigate Project-related impacts, the Project Applicant shall replace the 200 trees at a 3:1 ratio, resulting in the planting of 600 new trees on-site. Replacement trees specified on the landscape plans with a mixture of 5-gallon, 15-gallon, and 24-inch-box trees shall be deducted from the replacement requirement. The remaining number of trees unable to be accommodated on-site shall be mitigated for by payment of in-lieu



fees per the City of Azusa Tree Preservation and Protection Ordinance per *City of Azusa Municipal and Development Code* Section 62-191 through 62-201.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

5.3.5 CUMULATIVE IMPACTS

Section 15355 of the *CEQA Guidelines* requires an analysis of cumulative impacts, which are defined as, “two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts.” As outlined in Table 4-1, *Cumulative Projects List*, and illustrated on Exhibit 4-1, *Cumulative Projects Map*, cumulative projects are located on both developed and undeveloped sites.

SPECIAL-STATUS PLANT AND WILDLIFE SPECIES

- **Would the Project, combined with implementation of other related cumulative projects, have a cumulatively considerable adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status?**

Impact Analysis: Development of cumulative projects could result in direct take of special-status species, construction and post-construction disturbances, and/or special-status habitat conversion. However, as with the Project, all future cumulative development would undergo environmental review on a project-by-project basis, to evaluate potential impacts to biological resources and ensure compliance with the established regulatory framework. As such, cumulative impacts to biological resources within the City would be mitigated on a project-by-project basis.

As concluded in Impact Statement BIO-1, no special-status plant or wildlife species were observed on-site, and none were determined to have a potential to occur. Further, no special-status habitats are present on-site. Therefore, development of the proposed Project would not result in cumulatively considerable impacts to special-status species or habitat.

Standard Conditions of Approval: No standard conditions of approval are applicable.

Mitigation Measures: No mitigation measures are required.

Level of Significance: No Impact.

WILDLIFE CORRIDORS

- **Would the Project, combined with implementation of other related cumulative projects, cause a cumulatively considerable interference with the movement of a native resident or migratory species?**

Impact Analysis: Cumulative projects identified in Table 4-1 and on Exhibit 4-1 could be located within a local or regional designated migratory corridors or linkages. Therefore, cumulative projects could disrupt or have an adverse effect to potential wildlife movement. Further, plant communities found on cumulative project sites could provide foraging habitat, nesting/denning sites, and shelter



for wildlife including migrant and nesting bird species. Although the cumulative projects could potentially impact the movement of a native resident, migratory species, or nesting birds, all future cumulative development would undergo environmental review and appropriate mitigation, as necessary, on a project-by-project basis. Nesting birds are protected pursuant to the MBTA, Bald/Golden Eagle Protection Act, and Fish and Wildlife Code (Sections 3503, 3503.5, 3511, and 3513). Implementation of SCA BIO-1 through SCA BIO-4 would reduce indirect construction impacts, and Mitigation Measure BIO-1 would require pre-construction surveys for nesting birds and active nests, which would reduce Project impacts to less than significant levels. Thus, Project implementation would not result in significant cumulatively considerable impacts to the movement of native resident, migratory species, or nesting birds.

Standard Conditions of Approval: Refer to SCA BIO-1 through SCA BIO-4.

Mitigation Measures: Refer to Mitigation Measure BIO-1.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.

TREE PRESERVATION

BIO-3 Would the Project, combined with implementation of other related cumulative projects, cause a cumulatively considerable interference with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis: Other cumulative projects have the potential to impact trees protected under the City's Tree Preservation and Protection Ordinance. However, impacts would be determined on a project-by-project basis under separate CEQA review and would depend whether there are any protected trees on the related project sites.

Development of the Project would impact 200 trees on-site with good to fair ratings that are protected under the City's Tree Preservation and Protection Ordinance. Implementation of Mitigation Measure BIO-2 would ensure the impacted trees are replaced at a 3:1 ratio on-site, and implementation of SCA BIO-5 through SCA BIO-7 would ensure preserved trees on-site are not adversely impacted by Project-related construction activities. Best management practices prior to, during, and after construction activities are detailed in SCA BIO-5 through SCA BIO-7. Thus, the proposed Project, in combination with other related projects, would not cumulatively contribute towards any interference with the City's Tree Preservation and Protection Ordinance. Impacts would be less than significant with mitigation incorporated.

Standard Conditions of Approval: Refer to SCA BIO-5 through SCA BIO-7.

Mitigation Measures: Refer to Mitigation Measure BIO-2.

Level of Significance: Less Than Significant Impact With Mitigation Incorporated.



5.3.6 SIGNIFICANT UNAVOIDABLE IMPACTS

Biological impacts associated with the Project would be less than significant with incorporation of the recommended mitigation measure. No significant unavoidable impacts to biological resources would occur.



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