San Gabriel Valley Greenway Network Strategic Implementation Plan Final Program EIR

SCH #2022090340

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SECTION 1 Introduction

1.1 Purpose and Organization of this Document

This Final Program Environmental Impact Report (PEIR) (State Clearinghouse No. 2022090340) has been prepared according to the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) to evaluate and disclose the potential environmental impacts associated with implementation of the proposed San Gabriel Valley (SGV) Greenway Network Implementation Plan (Project) in Los Angeles County, California. Los Angeles County (County) through Los Angeles County Public Works (Public Works) is serving as lead agency under CEQA for the PEIR. The Final PEIR presents the environmental information and analyses that have been prepared for the proposed Project, including comments received addressing the Draft PEIR, and responses to those comments. The Final PEIR will be used by the Los Angeles County Board of Supervisors in the decision-making process for the proposed Project. This Final PEIR is organized as follows:

- Chapter 1, Introduction
- Chapter 2, Response to Comments
- Chapter 3, Clarifications and Modifications to the Draft PEIR
- Appendices

The Final PEIR appendices are identified as follows and are in addition to those already included in the Draft PEIR.

- Appendix A, Comments Received on the Draft PEIR
- Appendix B, Updated Draft PEIR Appendices

The Final PEIR includes, by incorporation, the Draft PEIR, along with the clarifications and modifications included in Chapter 3, and provides responses to comments received on the Draft PEIR.

1.2 Project Background and Location

The Project Area or Plan Area evaluated in this PEIR is defined as 140 linear miles of Los Angeles County Flood Control District (District) rights-of-way (ROW) and adjacent parcels along the washes and creeks in the SGV in eastern Los Angeles County, outside of the jurisdictional boundaries of the washes and creeks. Design information for the SGV Greenway Network Implementation Plan (the Plan) is at a conceptual level; therefore, the environmental impact analysis is presented at a program level and does not include project-specific or site-specific analysis. The Plan presents 10 conceptual design examples that have not yet been funded or planned for implementation; however, they represent the types of projects that are feasible in the SGV and that would be covered under this PEIR.

1.3 Environmental Review Process

1.3.1 Public Circulation

1.3.1.1 Notice of Preparation

The County, in accordance with CEQA, prepared a Notice of Preparation (NOP), which was released to the public and filed with the State Clearinghouse in the Office of Land Use and Climate Innovation and the Los Angeles County Clerk on September 20, 2022. The NOP provided notice to the public and public agencies that a PEIR would be prepared, described the proposed Project that would be evaluated in the PEIR, listed the probable environmental effects of the Project, and identified the date, time, and location for an online scoping meeting, which was held virtually on October 4, 2022.

The NOP was distributed to involved public agencies and interested parties for a 30-day public review period (September 20, 2022 through October 20, 2022). A copy of the NOP is included in Appendix A of the Draft PEIR, along with written comments provided by the public and public agencies in response to the NOP. These comments were considered during preparation of the Draft PEIR.

1.3.1.2 Draft PEIR

Notification of the availability of the Draft PEIR was filed with the State Clearinghouse in the Office of Land Use and Climate Innovation and the Los Angeles County Clerk on April 15, 2025. Release of the PEIR to the public began a 45-day comment period, extending from April 15, 2025 to May 30, 2025. During that timeframe, members of the public, and public agencies and other entities had the opportunity to review the Draft PEIR and provide comments on the document, including adequacy of the impact analyses.

The Draft PEIR was available for review on Public Works' website (https://pw.lacounty.gov/core-service-areas/water-resources/sgvgnsip-peir/). Physical copies of the Draft PEIR were also available for review at the following locations:

- Los Angeles County Public Works Headquarters, 900 South Fremont Street, 11th floor, Alhambra, CA 91803
- Altadena Library, 600 E Mariposa St. Altadena, CA 91001
- Arcadia Public Library, 20 W. Duarte Road, Arcadia, CA 91006
- Baldwin Park Library, 4181 Baldwin Park Boulevard, Baldwin Park, CA 91706
- Covina Public Library, 234 N. 2nd Avenue, Covina, CA 91723
- Glendora Public Library, 140 Glendora Avenue, Glendora, CA 91741
- Hastings Branch Library, 3325 E. Orange Grove Boulevard, Pasadena, CA 91107
- La Puente Library, 15920 Central Avenue, La Puente, CA 91744
- La Verne Public Library, 3640 D Street, La Verne, CA 91750
- Monrovia Public Library, 321 S. Myrtle Avenue, Monrovia, CA 91016
- Rosemead Library, 8800 Valley Boulevard, Rosemead, CA 91770
- San Gabriel Library, 500 S. Del Mar Avenue, San Gabriel, CA 91776

Public notice of the availability of the Draft PEIR was provided in the following publications: LA Times, LA Daily News, La Opinion, SGV News Tribune, and Pasadena Star News. Copies of the notice of availability were mailed via certified mail to public agencies and all individuals who provided scoping comments on April 15, 2025, and also sent via email on April 15, 2025.

SECTION 2 Response to Comments

2.1 Requirements for Responding to Comments on a Draft EIR

Lead agencies are required to evaluate all comments on environmental issues received on the Draft PEIR and prepare a written response pursuant to State CEQA Guidelines Section 15088. Written responses should address the environmental issue(s) raised and provide a detailed response. Rationale must be provided when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good-faith and reasoned analysis. As long as a good-faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204), lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters.

State CEQA Guidelines Section 15088 also recommends that, where the response to comments results in revisions to the Draft PEIR, those revisions should be noted as a revision to the Draft PEIR or in a separate section of the Final PEIR. Chapter 3, Clarifications and Modifications to the Draft PEIR, outlines the revisions to the Draft PEIR.

2.2 List of Commenters

The public agencies and members of the public private citizens who submitted comments on the Draft PEIR during the public review period are listed in Table 2.2-1. The comment letters and their responses are arranged by public agencies (A), and individuals (I).

Table 2.2-1. List of Commenters

No.	Name	Agency/Organization	Date
A1	Richard Le	California Public Utilities Commission (CPUC)	May 5, 2025
A2	Kelly Gardner	Main San Gabriel Basin Water Master	May 28, 2025
A3	Anthony Higgins	California Department of Transportation (CalTrans)	May 29, 2025
A4	David Lin	California Department of Fish and Wildlife (CDFW)	May 30, 2025
I1	Steve Mateer	Individual	April 18, 2025

2.3 Comments and Response to Comments

This section responds to those comments received that specifically pertain to the scope and content of the Draft PEIR. The written comment letters received by the County are included in appendix A of this Final PEIR. These comments and associated responses will be submitted to the Board of Supervisors for consideration as part of the Final PEIR.

Where comments have prompted changes to text in the Draft PEIR, these changes have been identified in Chapter 3, Clarifications and Modifications to the Draft PEIR. Where no changes are noted to the FEIR, no changes were determined to be necessary as a result of the comment. Where stated in the responses that implementation of mitigation measures would reduce potentially significant impacts to less-than-significant levels, it is assumed that the agencies implementing the projects will employ the mitigation as well. As noted in the Draft PEIR on page 1-4, "Each implementing agency would determine the significance after mitigation for potential impacts of their proposed projects."

2.3.1 Comment Letter A1: California Public Utilities Commission

Comment #	Comment Text	Comment Response
A1-1	CPUC recognizes the current plan does not define any immediate construction or respective project boundaries, but as the example projects describe, future developments will likely cross through railroad crossings both at-grade and grade-separated in the SGV. Any proposed modifications to any at-grade crossing will require authorization from the CPUC. Additionally, CPUC recommends that at any at-grade crossing the future paths and trails will cross, the project team(s) implement pedestrian treatments including pedestrian warning devices and gates as well as channelization, and to bring the crossings up to current standards and in compliance with ADA requirements. For any currently grade-separated crossing, CPUC authorization is required if any project intends to modify the structure of the crossing or create a new crossing above or beneath the railroad corridor. Any projects adjacent and parallel to a railroad corridor should also ensure proper fencing and deterrence are installed to discourage trespassing onto railroad right-of-way.	As stated in Section 2.3.1.3, *"For railroad crossings, California Public Utilities Commission (CPUC) coordination would be required"*. This has been revised to provide the following clarification: <u>Any proposed modifications to any at-grade crossing would require authorization from the CPUC. Also, for any currently grade-separated crossing, CPUC authorization would be required if the project proposes to modify the structure of the crossing or create a new crossing above or beneath the railroad corridor.</u> With regard to pedestrian treatments, the following sentence in Section 2.3.1.3 has been revised to provide the following clarification: *Channel crossings could be facilitated by utilizing existing roads and railroad tracks, which may require addition of safety signals, crosswalk signage, <u>fencing,</u> and other infrastructure meant to protect cyclists and pedestrians from road and rail traffic <u>and discourage trespassing onto the railroad right-of-way.</u>*
A1-2	Any proposed crossing improvement project must also conform to the goals of the CPUC's Environmental and Social Justice Action Plan. This includes improving safety and access to transportation, improving local air quality and public health, and expanding outreach and public participation opportunities in disadvantaged communities.	Comment noted. It is expected that if any future project requires authorization from the CPUC, such authorization will include confirmation that the proposed modifications conform to the stated Plan.

2.3.2 Comment Letter A2: Main San Gabriel Basin Watermaster

Comment #	Comment Text	Comment Response
A2-1	The Plan discusses 10 prime conceptual locations for the Greenway Network, referred to as "Tier 1" sites within the document. These potential sites include San Gabriel Valley tributary channels. It is important	Comment noted. The 10 conceptual design examples are presented as examples of how future projects may incorporate the various project

Comment #	Comment Text	Comment Response
	to note that the surface water rights for the San Gabriel River, the Rio Hondo, and the tributaries to these rivers are accounted for, and no water shall be diverted from these washes, nor any streamlines that feed the San Gabriel River and Rio Hondo, except as provided by the existing surface water rights as exercised by the holders of those water rights, who are the Basin Judgement, San Gabriel River Protective Association with State Water Resources Control Board surface water rights and the City of Glendora with State Water Resources Control Board surface water rights.	components described in the Plan and do not represent actual proposed projects. See response to A4-10.
A2-2	Section 2.2.2.1.6 “San Dimas Wash/Puddingstone/Live Oak”, page 17 2nd paragraph states “….The underlying parcels of these tributaries are mostly owned by the District; however, some of the easement only allow for flood control operation and would need to be modified for a greenway to be operated….” Comment: How will this modification affect flood control operation during greenway construction?	The descriptions presented in Section 2.2.2.1 provide a summary of the opportunities and constraints of the District ROW and adjacent parcels along the subject washes. An individual project proponent proposing a specific project within these easement areas would be responsible for evaluating the required modifications and ensuring proposed projects are compatible with local land use policies and ordinances. As stated in Section 3.11.3.2.2.1: *All greenway paths, greenway amenities, pocket parks, safe crossings, and stormwater management facilities would be developed within and adjacent to the District ROW. To construct a project on District ROW, a project proponent would generally be required to obtain a permit, lease, use agreement and/or other authorization from the District. In addition, portions of projects within incorporated areas would be under the land use jurisdiction of those incorporated cities and a project proponent may also have to apply for a land use permit or other approval from that the County or specific city, in addition to a permit from the District for the portion of the project is proposed to be located on District ROW. As discussed in Section 2.3.2, the Design Guidelines and Standards are focused on multi-use for pedestrians. For projects proposed entirely in the unincorporated County jurisdiction, compliance with the Design Guidelines and Standards would ensure compliance with County land use policies and impacts would be less than significant. For projects that are proposed in incorporated cities within the Plan Area, compliance with the Design Guidelines and Standards may conflict with the land use policies or regulations of the municipality in which the project is located. While land use permitting may be achieved through a conditional use*

Comment #	Comment Text	Comment Response
		permit, variance, zoning amendment, and/or specific plan amendment, these land use conflicts may result in significant and unavoidable impacts.
A2-3	Section 2.3.1.1.4 "Anticipated Operations", page 51 1st paragraph states "…Hazardous materials used for maintenance would be minimal and may consist of commonly used hazardous materials such as solvents for cleaning, paints, fuels for equipment, and approved herbicides or pesticides…" Comment: Here it is stated that hazardous materials, while kept to a minimum, would be used for maintenance. These hazardous materials cause serious concern due to the potential risk of contaminants that could enter surface water flows and/or percolate into the groundwater basin. Because the Plan is designed to reduce overall impervious surface area, there is an even higher possibility of these hazardous materials affecting the quality of groundwater. What are the County's specific plans to prevent this occurrence?	As stated in Section 3.9.3.3.1 response to Question 9(a), on page 573: *Operations of the greenway paths, greenway amenities, pocket parks, greenspaces, safe crossings, and stormwater management facilities would attract visitors to the Plan Area. Recreational uses (such as those associated with pedestrian, bike, and multi-use trails) and related amenities (e.g., fencing, benches, landscaping, restrooms.) and maintenance of those recreational uses would occur. The transport, use, and disposal of hazardous materials would consist of solvents, paints, fuels for equipment commonly associated with maintenance of public spaces. Their use would be minimal and localized, and spills that may occur would be contained and cleaned as they occur consistent with applicable rules and regulations. In some cases, maintenance could involve the use of pesticides and/or herbicides. However, these materials would be used in small amounts, intermittently, and with proper care as dictated by their accompanying SDS, and only County-approved substances would be used under the Plan. Thus, the potential for release of hazardous materials would be minimal. Therefore, operation of greenway paths, greenway amenities, pocket parks, greenspaces, safe crossings, and stormwater management facilities is not expected to create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.*
A2-4	Section 2.3.1.4 "Storm Water Management", page 59 2nd paragraph states "…Reducing impervious surface area is an overall beneficial change to the landscape and would allow more water to enter the soil…" Comment: As stated previously, an increase to pervious surfaces may result in issues with water quality. Please address how the County plans to prevent this.	As stated in Section 3.10.3.3.1 in response to Question 10(a) on page 691: *Although the construction of Plan components could increase impervious surfaces, the Design Guidelines and Standards require a stormwater BMP to infiltrate and/or treat a site's SWQDv where new infrastructure (greenway and other impervious surface) is proposed as described above. with a preference for nature-based solutions. With any new construction (e.g., greenway path), a stormwater BMP must be selected to manage the calculated SWQDv through on-site infiltration or an alternative action. The most common practices include bioretention, subsurface infiltration, and permeable pavement. Permeable pavement can be used for the*

Comment #	Comment Text	Comment Response
		greenway surface and narrow bioretention strips (bioswales) can be used along the greenway to capture runoff from asphalt and concrete surfaces. BMPs are described in detail in the Design Guidelines and Standards. *BMPs would be designed to work with the overall stormwater approach for the project site and would be properly sized with respect to drainage areas they are treating. Recommended best practices, including pre-treatment BMPs to remove solids, sediments, trash, and debris, may be added or required.* *BMP design would comply with the Public Works LID Standards Manual. Implementation of stormwater treatment and landscape features would allow water to percolate into the ground, thereby treating stormwater runoff through biological uptake, and/or reducing the discharge of pollution to the storm drain system. Any potential contaminants would be filtered, minimizing adverse effects on groundwater quality. The use of permeable paving, filtration and percolation of stormwater, and on-site water retention or detention would reduce or eliminate stormwater pollution and reduce runoff.* *With implementation of stormwater BMPs and compliance with NPDES Construction General Permit post-construction stormwater standards, County or other local water quality requirements, as applicable, degradation of surface water and groundwater quality from operations of greenway paths and greenway amenities would be minimized. The Design Guidelines and Standards provide guidance for the implementation of stormwater quality control measures and the recommended design methodology to manage stormwater. Additionally, municipalities in the Plan Area, as MS4 permittees, have similar LID standards (see Section 3.10.2.4 for a summary of local policies). Implementation of stormwater BMPs would reduce stormwater runoff flows and associated pollutants and treat stormwater runoff. Operation of the greenway paths and greenway amenities would not violate any water quality standards or degrade water quality. Therefore, impacts would be less than significant.*
A2-5	Section 2.3.1.4.1.3 "Site-scale Detention", page 61 "…Site-scale detention facilities can reduce peak flows and improve water quality by storing water in a basin before slowly draining the water through an orifice to the	As stated in Section 1.2 on page 4: *A PEIR is a type of EIR that can be prepared on a series of actions that can be categorized as one large project and are related geographically; as logical parts in the chain of*

Comment #	Comment Text	Comment Response
	downstream waterway…" Comment: New detention basins can allow for water stored to be contaminated by pollutants due to storm water runoff along the ground. Because the plan is to drain the water to a downstream waterway, a risk of contamination to the waterways arises. The exact plan of these detention basins is unclear in the EIR (lacking location maps, site plans, operation plans, etc.). In addition, these proposed detention basins may be duplicative of downstream facilities. Please provide more details.	*contemplated actions; in connection with issuance of rules, regulations, plan, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority (State CEQA Guidelines Section 15168). The Plan provides guidance to serve as framework for future projects; however, the Plan lacks sufficient detail to support project-level analysis (e.g., Initial Study or EIR) as individual projects will be developed as funding and resources become available to project proponents. A PEIR does not analyze site-specific construction and operation details. Rather, a PEIR serves as a first-tier environmental document that focuses on the purpose and need for the program and broadly describes the effects of implementing the program.* Potential implementation of projects under the Plan may not require additional documentation if Plan components fall under the existing framework and analysis for impact, or could require additional documentation such as an addendum, Initial Study, or EIR, depending on the intensity of impact compared to the scope of the Plan elements presented in this EIR. Project-specific elements will be addressed when sufficient details are designed for individual proponents that could fall under the Plan. Accordingly, individual project proponents will select the exact project location within the Plan Area and determine the appropriate stormwater BMPs to integrate into the project based on the individual site constraints, as further described in Section 3.10.3.3: *Specific stormwater management options would vary by site based on the unique constraints and needs of the location. Stormwater BMP implementation will depend on available ROW and specific greenway project formulation which may limit the use of some types of BMPs. Under the Plan, BMP selection would generally be determined at the project-level considering project objectives and constraints, regulatory and/or permit requirements, and jurisdictional approvals. In cases where specific pollutants are of concern in a project area, the appropriate BMP and treatment will be determined on a case-by-case basis for that pollutant.* With regard to potential impacts to water quality, please see response to Comment A2-4.

Comment #	Comment Text	Comment Response
A2-6	Section 3.10.3.3 "Plan Impacts", page 689 1st paragraph states "…One of the Plan goals is the integration of stormwater management/capture, groundwater recharge, and water quality improvement into future greenways…" Comment: This section requires a more detailed description of the capturing of stormwater, the recharge of groundwater and water quality improvement into future greenways.	Please see response to comment A2-5.
A2-7	Section 3.10.3.3.2.1 "Greenway Paths and Greenway Amenities + Pocket Parks and Greenspace Safe Crossings + Stormwater Management", page 692 1st paragraph states "…In the event groundwater is encountered during construction, dewatering would be conducted on a temporary basis during the construction phase…" Comment: This appears to suggest that during the construction phase of the project, excavation will possibly encounter the water table. This is a serious concern, as any excavation should not have the potential risk of encountering any groundwater and be close to the water table. It is understood that excavation is limited to two to six feet below existing grade for these systems. However, it should still be noted that Watermaster will protect the storage capacity of the Main San Gabriel Basin aquifer as being consistent with the historic high groundwater elevation. As shown in Figure 1, the historic high groundwater elevation recorded at the Baldwin Park Key Well (Key Well) was measured at 325.8 feet above mean sea level (amsl) in 1944 and considered the appropriate highest groundwater elevation to use for planning purposes. The reference point elevation of Key Well in 1944 was measured at 387.7 amsl. Therefore, the groundwater depth would be about 61.9 feet when the Main San Gabriel Basin is at is known highest groundwater elevation. The groundwater elevation in the Main San Gabriel Basin is constantly changing and has the potential to return to the historic high of 325.8 feet amsl at the Key Well due to local weather conditions, imported deliveries, replenishment opportunities, and other factors Watermaster may consider maintaining the Man San Gabriel Basin. No pumping of groundwater should be considered without Watermaster review, accounting, and monitoring. Some questions that arise are What kind of dewatering measures are being discussed here? What are the	Comment noted. The following clarification has been added to the response to Questions 10(a) in Section 3.10.3.3.1 and 10(b) in Section 3.10.3.3.2, As noted in Section 2, any excavations would be limited to two to six feet below ground surface. Typical groundwater elevation in the Plan Area is 61.9 feet, well below any anticipated excavations. Therefore, the potential for project construction to encounter groundwater is highly unlikely. Nevertheless, in the very unlikely event that ~~In the event~~ groundwater is encountered during construction, dewatering would be conducted on a temporary basis during the construction phase and would not result in a loss of water that would substantially deplete groundwater supplies. With regard to the concern related to water quality contaminants, as noted in response to Question 10(a): *Only if dewatering for an individual project site is required, the SWPPP would include a dewatering plan, which would establish measures to prevent and minimize sediment and contaminant releases into groundwater during excavation. Dewatering activities would be required to comply with the NPDES Construction General Permit, LARWQCB WDRs for discharges of groundwater (Order No. R4-2018-0125), and local dewatering requirements to prevent potential water quality impacts on surface waters or ensure proper treatment measures are implemented prior to discharge. In the event of dewatering during construction activities or before dewatering to surface water via a storm drain, the contractor would obtain coverage under the NPDES Construction General Permit from the LARWQCB. Coverage under the NPDES Construction General Permit typically includes dewatering activities as authorized non-stormwater discharges, provided that dischargers prove the quality of water to be adequate and not likely to*

Comment #	Comment Text	Comment Response
	County's plans to prevent water quality contaminants into the groundwater? Needs a more detailed description.	*affect beneficial uses. All requirements of dewatering would be met to ensure water quality is not adversely affected.*
A2-8	Section 3.10.3.3.2.1 page 693 1st paragraph states "…The water supply for construction activities (e.g., dust control, concrete mixing, material washing) would most likely come from nearby hydrants and existing surface supplies and/or would be trucked to the proposed sites…" Comment: This section states that the water supply for construction activities would most likely come from existing "surface water" supplies. Water rights for the surface water supplies from the San Gabriel River and the Rio Hondo River are all accounted for and no water shall be diverted from any surface supplies in the San Gabriel Valley Watershed. The County should contact the Watermaster prior to considering use of any existing surface water supplies. In addition, it is stated that in compliance with South Coast Air Quality Management District Rule 403, dust control measures would be implemented to prevent movement offsite into adjacent waters. Watermaster requests a detailed description of these measures and how the County would ensure that surface water is protected.	Comment noted. The section notes that water supply for construction could also come from nearby hydrants and/or would be trucked to the proposed sites. Each individual project proponent would need to determine the most appropriate source of water for their specific project based on the constraints at their project location. The following clarification has been made in the Final PEIR: *The water supply for construction activities (e.g., dust control, concrete mixing, material washing) would most likely come from nearby hydrants ~~and existing surface supplies,~~ and/or would be trucked to the proposed sites.* With regard to SCAQMD Rule 403, Section 3.3.2.3.1, page 156 states: *Rule 403 prohibits emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area that remains visible beyond the property line of the emission's source. During construction, best available control measures identified in the rule would be required to minimize fugitive dust emissions from proposed earthmoving and grading activities. These measures would include site pre-watering and rewatering as necessary to maintain sufficient soil moisture content. Additional requirements apply to construction projects on properties with 50 or more acres of disturbed surface area or any earthmoving operation with a daily earthmoving or throughput volume of 5,000 cubic yards or more three times during the most recent 365-day period. These requirements include submittal of a dust control plan, maintenance of dust control records, and designation of an SCAQMD-certified dust control supervisor.*

2.3.3 Comment Letter A3: Caltrans

Comment #	Comment Text	Comment Response
A3-1	Please note, that any project work occurring within or abutting Caltrans ROW will require an encroachment permit, and all concerns and requirements must be addressed. Final design requirements for any	Comment noted. The County's EIR is intended to address environmental impacts related to any necessary permits for the Project. The following clarification has been provided to MM TR-2: Restrict Lane Closures and

Comment #	Comment Text	Comment Response
	proposed changes to infrastructure within or along Caltrans right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed.	Maintain Access. *The project proponent shall restrict all necessary lane closures or obstructions associated with construction activities to off-peak periods to reduce traffic delays.* <u>*Project work within or abutting a Caltrans right of way shall not occur unless authorized by an encroachment permit.*</u> *Lane closures shall not occur between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., unless otherwise authorized by the responsible public agency with jurisdiction over the affected street or highway through the issuance of an encroachment permit.*

2.3.4 Comment Letter A4: California Department of Fish and Wildlife

Comment #	Comment Text	Comment Response
A4-1	Issue: The Project may impact biological resources because of increased visitor usage and recreation. Specific impact: The Project may cause local extirpation of wildlife from otherwise suitable habitat. Direct impacts on wildlife may include energetic costs to the animal, nest abandonment, reduced reproductive success, and reduced fitness. Why impact would occur: The Project proposes to create recreational opportunities where opportunities do not currently exist….Increased visitor usage and recreation along the San Gabriel River, the Rio Hondo, and its tributaries has potential to impact wildlife and habitat through a variety of ways, including: increased number of people and pets; increased area of influence; increased noise levels; increased artificial outdoor lighting; increased trash or pet waste; introduction of unnatural food sources via trash and trash receptacles; loss of habitat due to erosion from non-official footpaths; and loss of habitat due to introduction or spread of invasive plant species. Recreation and increased human activities can have the following effects on wildlife:	The PEIR evaluates the potential impact to biological resources from recreational uses in response to Questions 4(a) and 4(d) in Section 3.4.3.3 and identifies increased visitor usage as a potentially significant impact. Public Works appreciates the examples provided by CDFW in its comment letter – for clarification, neither the Belding's savannah sparrow nor the blue tit are known to occur within the Plan Area. Mitigation Measure BIO-9 requires project proponents to develop an Operations Recreation Plan, one aspect of which is signage. In addition, the mitigation measure requires a plan to manage unauthorized uses through coordination with local resources, wildlife-proof waste bins, requirements for leashing pets, and pet waste dispenser and disposal stations. The following additional language has been added to MM BIO-9: <u>The qualified biologist shall review all proposed temporary and permanent project elements—such as fencing, gates, and guardrails—for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.</u> <u>o Trail design – where avoidance is not feasible and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational</u>

Comment #	Comment Text	Comment Response
	Non-consumptive recreation can lead to detrimental changes in animal behavior, reproduction, growth, and immune system function (Lucas 2020). Human presence can instill strong fear in wild animals, which may adjust their activity to avoid contact with humans. Such risk avoidance can have important nonlethal effects on animal physiology and fitness. This shift may have negative and far-reaching ecological consequences (Gaynor et al. 2018; Mitrovich et al. 2020). Human activities that result in escape or avoidance behaviors may increase the probability of a bird being detected by a predator, increase intraspecific aggression in colonial species, expose bird chicks and eggs to adverse environmental conditions that can cause embryo death, and divert energy from feeding or reproduction to defensive behaviors (Hillman et al. 2015). Blue tit (*Cyanistes caeruleus*) nestlings near recreation facilities develop slower and fledge with low body mass and poor body condition (Remacha et al. 2016). Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) is sensitive to pedestrian and vehicle traffic. An approaching distance of 3 meters and 2.8 meters during the pre-nesting and nesting season, respectively, alert Belding's savannah sparrows to take flight (Fernandez-Juricic et al. 2009). Being approached by a person may trigger a change in the behavior or physiological processes in a bird (e.g., flight responses or increased heart rate). Although these responses tend to be short in duration, they can have longer term effects as is the case of breeding birds being flushed from nests leaving eggs or chicks vulnerable to predation (Steven et al. 2011). Relatively 'low' impact activities such as walking or hiking can still have negative effects on birds (Steven et al. 2011). Increased noise may alter or mask the auditory signals required for information exchange in birds (Hillman et al. 2015).	<u>structures to avoid and minimize impacts on sensitive wildlife and/or habitat features</u> <u>o Setbacks and restrictions – where avoidance is not feasible and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, could include restrictions of the size of gathering areas at pavilions, etc.</u> Further Mitigation Measure BIO-1, requires project proponents to consider potential impacts during project design: *"To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters."*

Comment #	Comment Text	Comment Response
	Some species of birds are sensitive to off-trail activities, particularly dog walking (greater area of influence) (Miller et al. 2001). Artificial light at night can disrupt wildlife behavior. Even residential-scale white LED flood lights in a residential setting can disturb bat foraging activities from a 25- to 75-meter radius (Seewagen et al. 2023). Patterns of wildlife habitat use can be disrupted by disturbances occurring outside of regular human activity, such as large recreation events, off-trial visitor behavior, or the proliferation of new social trails, even in areas that traditionally see high levels of visitor use (Mitrovich et al. 2020). The Project has proposed to Mitigation Measure BIO-9 Operations Recreation Plan, to mitigate for potential impacts of recreation on biological resources. Mitigation Measure BIO-9 proposes signage warning recreational users to avoid certain environmentally sensitive areas. However, signage alone may be insufficient to deter or prevent recreational users from accessing sensitive areas. Seasonal closures of public access have been proposed in the LACPW's Los Angeles River Master Plan to mitigate for potential impacts on wildlife during certain times of year (e.g., bird nesting season). However, wildlife could use or occupy habitat year-round. Wildlife could become displaced or extirpated from otherwise functional habitat where recreational activities are created or increased. Signage and seasonal closures alone may be insufficient to mitigate for the Project's potential to displace or extirpate wildlife. Evidence impact may be significant: Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW and/or U.S. Fish and Wildlife Service (USFWS).	
A4-2	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-1, Impacts of Recreation on Wildlife]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #1: Recreational Impact Analysis and Mitigation Planning. LACPW shall include measures under	Mitigation Measure BIO-1, requires project proponents to consider potential impacts during project design: *"To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for*

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	Mitigation Measure BIO-9 (or where appropriate) whereby individual subsequent project proponents shall analyze impacts of recreational activities on biological resources. At a minimum, an analysis shall include: 1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and 2) potential for wildlife entanglement in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity. Future project proponents shall prepare a site-specific operations recreation plan based on the expected recreational usage for the purpose of sufficiently mitigating recreational impacts on biological resources.	*regional or local wildlife movement, and jurisdictional wetlands and associated waters."* In addition, Mitigation Measure BIO-9 already requires future project proponents to prepare a site-specific operations recreation plan to avoid and/or minimize potential impacts of recreational activities on biological resources. The following additional language has been added to MM BIO-9: <u>The qualified biologist shall review all proposed temporary and permanent project elements—such as fencing, gates, and guardrails—for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.</u> <u>o Trail design – where avoidance is not feasible and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features</u> <u>o Setbacks and restrictions – where avoidance is not feasible and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, could include restrictions of the size of gathering areas at pavilions, etc.</u>
A4-3	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-1, Impacts of Recreation on Wildlife]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #2: Adopt Design Best Practices to Address Recreational Impacts. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent project proponents shall implement design practices that best avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project should restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, access points, and all recreation-related structures to avoid sensitive areas. All existing and new outdoor lighting shall be designed, installed, and maintained in a manner that minimizes impacts on biological	The Design Guidelines and Standards provide detailed specifications for lighting related to Wildlife and Habitat areas as listed below, and on page 107 of the Draft PEIR: *Additional Guidance for Wildlife and Habitat Areas* • *Use only what fixtures are needed, and the warmest color temperature possible to provide safety and egress.* • *Do not over-light or make lights unnecessarily bright.* • *Provide fixtures and controls capable of dimming or shutting off lighting when occupancy loads are low (example: dimmable driver and occupancy sensor).* • *Color rendering should be at least 80 CRI.* • *Avoid light bollards where possible.*

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	resources. CDFW recommends the following design guidelines for outdoor lighting: 1) Light Output Limits. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber color spectrum. Light fixtures shall be designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety. 2) Vehicle Light Barriers. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway. 3) Reflective Signs and Road Striping. Retroreflectivity of signs and road stripping shall be implemented throughout the project to reduce the need for electrical lighting. 4) Light Pole Modifications and Shielding. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for light pollution caused by decreasing the number of light output sources in sensitive areas. 5) Light Fixture Locations. No lighting shall be installed within 250 feet of suitable habitat for sensitive species. Access to trails, paths, or other recreational facilities near suitable habitat shall be closed at night.	*• Use as few fixtures as possible. Fixtures should be low-level lighting. Avoid tall poles where possible.* *• Use the warmest color temperature possible, no more than 2200K as a maximum. Consider other measures that impact wildlife when selecting an appropriate fixture, such as the light spectrum emitted.* *• Transition to a warm color temperature in gradual steps if moving from a street or path of egress to a habitat area.* *• Provide fixtures and controls capable of shutting off lighting on a timer, such as when a park is closed, to limit the duration of lighting to the absolute minimum period possible.* *• No CRI level is required. Light should be as amber as possible.* *• Sample fixtures that may meet requirements include Landscape Forms RAMA, Landscape Forms Torres, and Hess Linea. BEGA also carries low-level lighting fixtures that may meet requirements for lighting wildlife habitat areas.* Accordingly, the proposed elements of the suggested mitigation measure are already incorporated into the Plan and the mitigation measures presented in the PEIR and no additional revisions related to lighting requirements have been made. With regard to vehicle light barriers, the Project would provide a network for alternative modes of transportation (e.g., bicycle, equestrian, and pedestrian paths) and does not include any new roadways for vehicles. The Design Guidelines and Standards recommend water-based paint, with glass beads to increase reflectivity for the purposes of pavement marking. In addition, MM AES-2, as described on page 108 of the Draft PEIR, requires project proponents to develop and submit a lighting plan to ensure consistency with local policies and ordinances in the municipality in which an individual project is proposed. Table 3.1-2, beginning on page 78, lists the applicable sections of municipal code and ordinances related to lighting for all municipalities within the Plan Area. Accordingly, the proposed elements of the suggested mitigation measure are already incorporated into the Plan and the mitigation measures

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		presented in the PEIR and no additional revisions have been made beyond those indicated in response to A4-2.
A4-4	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-1, Impacts of Recreation on Wildlife]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #3: Adopt Minimum Setbacks. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.	Mitigation Measure BIO-1, requires project proponents to consider potential impacts during project design: *"To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters."* In addition, Mitigation Measure BIO-9 already requires future project proponents to prepare a site-specific operations recreation plan to avoid and/or minimize potential impacts of recreational activities on biological resources, and Mitigation Measure BIO-13, described on page 283, requires permanent fencing and signage to restrict public access to any wetlands identified within or adjacent to a project footprint. Accordingly, the proposed elements of the suggested mitigation measure are already incorporated into the Plan and the mitigation measures presented in the PEIR and no additional revisions have been made.
A4-5	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-1, Impacts of Recreation on Wildlife]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #4: Implement Best Management Practices to Minimize Recreational Impacts. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate best management practices (BMPs) if avoidance is not feasible. Examples of BMPs could include sound barriers, visual barriers, or wildlife-viewing blinds. An appropriate BMP should consider the species and intensity of recreational use proposed.	See responses to A4-1, and A4-2.
A4-6	Issue: The Project may impact streams. Specific impacts: The Project may result in temporary or permanent modifications to a stream.	The Plan Area consists of the existing District ROW and adjacent parcels along the San Gabriel River, Rio Hondo and other tributaries. The Plan Area does not include the channels themselves and does not propose channel modifications or any work within any streams. The following

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	Why impacts would occur: The Project may modify the San Gabriel River, the Rio Hondo, and several other tributaries within the San Gabriel Valley by modifying the channel, modifying existing vegetation within the stream, installing new vegetation within the stream, installing or modifying bridges, culverts, or other infrastructure, or installing surface water diversion structures. Diversion structures may obstruct water flow and change the bed and channel of a stream (confinement). Water diversion may adversely affect the existing stream pattern, potentially resulting in substantial erosion or siltation within the project area and downstream. The Project proposes Mitigation Measure BIO-12 Desktop Review and Conduct a Jurisdictional Delineation to mitigate for potential impacts to streams. This Mitigation Measure calls for the avoidance of streams in favor of sites that have been previously disturbed or developed. However, Project activities in disturbed and developed areas may still require notification and permitting from CDFW. CDFW is particularly concerned about potential alterations to streams from the diversion of surface waters. Evidence impacts would be significant: Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following: Divert or obstruct the natural flow of any river, stream, or lake; Change the bed, channel, or bank of any river, stream, or lake; Use material from any river, stream, or lake; or, Deposit or dispose of material into any river, stream, or lake. The construction of diversion devices such as deployable barriers and inflatable dams, and conveyance of water structures within a stream is subject to notification under Fish and Game Code section 1602. The ongoing operations and maintenance of instream storm flow diversion devices and conveyance of water structures is also subject to notification under Fish and Game Code section 1602 once the devices are constructed. Also, the diversion of stormwater and/or dry weather runoff that flows	clarification has been added to Section 2.2.1: <u>The Plan Area does not extend into any SGV tributary channels, and the Plan does not include any components involving in-channel work.</u> The Draft PEIR includes the following language on page 281: *If any wetlands and/or jurisdictional aquatic resources are identified within the project footprint, then the project proponent would be required to obtain the required permits in compliance with Section 404 (issued by the USACE) and Section 401 (issued by the LARWQCB) of the federal CWA and/or Porter-Cologne Water Quality Control Act, and Section 1600 of the California Fish and Game Code. The project proponent would be required to implement all avoidance and mitigation measures and conditions included in the permits approved by the resource agencies.* The project does not propose construction of diversion devices such as deployable barriers, inflatable dams, conveyance of water structures within any streams, or instream storm flow diversion devices. Accordingly, the proposed elements of the suggested mitigation measure are already required by existing state and federal laws, and no additional revisions to the PEIR are required.

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	within streams or that have overflown the banks of streams, is subject to notification under Fish and Game Code section 1602. Recommended Potentially Feasible Mitigation Measure(s): Mitigation Measure #1: Lake and Streambed Alteration Notification. CDFW recommends LACPW modify Mitigation Measure BIO-12 Desktop Review and Conduct a Jurisdictional Delineation, to include the underlined language: "A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season	

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	<u>(April through October), and both above-average and below-average water year.</u>" Recommendation: Mitigation for Impacts to Streams. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.	
A4-7	Issue: The Project may divert surface stormwater and dry season flows from the San Gabriel River, the Rio Hondo, and several other tributaries in the San Gabriel Valley. Specific impact: Diverting stormwater and dry season flows into stormwater catchment basins, bioretention facilities, or infiltration galleries may reduce the availability and extent of water flow within a stream. There could be changes to the hydrologic regime both within a project area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year. Why impacts would occur: The Draft PEIR does not provide sufficient analysis as to whether the Project, specifically the "integrated stormwater management practices" "green infrastructure" and "low impact	Stormwater management is incorporated as an element of the SGV Greenway Network Plan and is consistent with existing, long-standing County requirements, including the 2014 LA County low-impact development ordinance, and the LA County Green Streets Design Guidelines and Standard Plans. The following clarification has been included in response to Question 4(a) in Section 3.4.3.3.1.1: <u>As described in Section 11.2 of the Design Guidelines and Standards, the Plan would require an individual project to include a stormwater BMP to infiltrate and/or treat a site's stormwater quality design volume (SWQDv) where new infrastructure (greenway and other impervious surface) is proposed with a preference for nature-based solutions. Further, as required by Section 11.3 of the Design Guidelines and Standards, BMP implementation will depend on available ROW and specific greenway project formulation which may limit the use of some types of BMPs. BMP selection should be at the design engineer's discretion considering project objectives and constraints but is subject to District approval. In</u>

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	development", would impact biological resources both within a project area and downstream. Biological Resources: Both the concrete-lined and soft-bottom portions of the San Gabriel River, the Rio Hondo, and their tributaries support biological resources. The concrete-lined portions of these streams are regionally significant, especially in a dense urban environment with substantial loss or alteration of the natural hydrologic regime and river ecosystems. Where these streams overtop the concrete-lined low-flow channel, the resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. These streams provide habitat for hundreds of bird species, making portions of them birding hotspots. The least Bell's vireo, a federal ESA and CESA-listed endangered species, has been documented at the Whittier Narrows among other areas within the Project setting. Least Bell's vireo depends on willow (Salix genus) riparian habitat. The San Gabriel River supports woody vegetation such as black willow (Salix goodingii), Fremont cottonwood (Populus fremontii), and arroyo willow (Salix laevigata) (USACE 2015). Flow reductions, especially dry season flow, could impact beneficial uses directly or indirectly through habitat modifications. Diverting water during the dry season could reduce the availability and extent of shallow water sheet flow. This could potentially impact algae and benthic invertebrates, and eventually birds. Willow riparian habitat may be impacted if flow reductions lead to receding shoreline or lower water depth. Loss of suitable habitat may impact sensitive species such as least Bell's vireo. Seasonality: The Draft PEIR does not analyze the potential significance of water diversion depending on the season. During the dry season, typically April through September in southern California, the San Gabriel River is largely influenced by urban runoff and discharge from several flood control dams (Cogswell, San Gabriel, Morris, etc.). Diverting water could be significant during the dry season and could either significantly reduce water flow or result in complete loss of water flow.	<u>cases where specific pollutants are of concern, the appropriate treatment technology should be implemented on a case-by-case basis. Accordingly, if BMPs such as infiltration galleries or catchment basins were installed as part of an individual project implemented under the Plan, they would be small-scale (up to 0.29 acres as stated in Section 2.3.1.4). Although the Plan does not include or proposed any large scale regional or centralized structural BMPs, the potential impact of such regional and centralized structures were analyzed in detail in the EWMP PEIR, and the following language from the EWMP PEIR is incorporated by reference to provide additional clarification:</u> <u>*BMPs designed to retain peak storm flows including regional BMPs would have no impact on downstream biological resources, since peak storm flows do not support perennial vegetation. The natural hydrology of the region experiences ephemeral flows that respond to seasonal precipitation, conveying water from the upper watersheds to the lower watersheds quickly.*</u> <u>*Urbanization has increased the speed of water flows through the system. The BMPs are designed to slow water flows and return to a hydrology closer to predevelopment conditions. However, some drainages have developed new perennial flow regimes that support vegetation as a result of landscape runoff or wastewater discharges. Some of this vegetation may support special-status species including least Bell's vireo or southwest willow flycatcher, particularly in suburban areas. If BMPs designed to retain dry-weather flows reduced the wetted area of drainages or completely eliminated flows in certain drainages that support riparian habitat, impacts to sensitive species would be significant….. The primary threat to the local ecology in Los Angeles County is urban development. Returning the local hydrology to a more natural condition would occur over time and would result in improved natural habitat functions with little direct impact to protected sensitive species.*</u> <u>*Although riparian habitat may flourish in certain urban drainages, the vegetation is often a nuisance. Many soft-bottom channels are periodically cleared of vegetation by the Los Angeles County Flood Control*</u>

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	Drought: The Draft PEIR does not analyze the potential significance of water diversion during a below-normal water year. Since 2000, the longest duration of drought in California lasted between 2011 and 2019 (USGS 2021) and in southern California, between 2012 through 2016 (Los Angeles Almanac 2021). The 2017-2018 rainfall season was below normal and the driest for Los Angeles since 2006-2007 (Los Angeles Almanac 2021). Diverting water during a below-normal rainfall year may significantly reduce water flow or result in complete loss of water flow. Evidence impacts would be significant: Changes to hydrology and channel morphology, both within a project area and downstream, are reasonable potential direct and indirect physical changes in the environment. Said changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project's significant, or potentially significant, direct, and indirect impacts on biological resources. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in a project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW, USFWS, and/or National Marine Fisheries Service (NMFS).	*District under a permit from the USFWS and CDFW that requires compensation elsewhere in the watershed. The reduction in perennial flows in most channels may result in less "choking" of flood control channels with nuisance vegetation, resulting in flood control benefits.* *Furthermore, in many cases, it is difficult to attribute the health and extent of a wetted area supporting vegetation to specific Municipal Separate Storm Sewer System (MS4) discharge points. Individual BMP installation may reduce flows, but not eliminate wetted areas supporting certain habitat areas, resulting in no immediate observed reduction in riparian cover. Over time, the addition of BMPs into suburban watersheds may reduce vegetation within certain drainages slowly as the cumulative effects of multiple BMPs combine to limit dry-weather flows. The gradual reduction in habitat would allow sensitive species to adapt to the changing conditions, particularly avian species such as least Bell's vireo would relocate to other nesting areas as conditions change. This is not dissimilar to natural conditions where riparian areas change over time with large flood flows. Although this gradual decrease in dry-weather flows in the region may reduce riparian vegetation in certain locations, the overall reduction is not expected to be significant, since the high-value habitats are limited and largely dependent on groundwater or wastewater treatment discharges....The smaller distributed BMPs [such as those included in the Plan] would not result in significant impacts.* *With regard to non-structural BMPs, the EWMP PEIR provides the following analysis which is incorporated by reference:* *Many of the non-structural BMPs would result in the reduction of dry-weather urban runoff that could reduce perennial flows in local drainages. Returning the local hydrology to a more natural condition would occur overtime and would reduce overall wetted areas within minor drainages and swales throughout the region. Local riparian and lake features that rely on urban runoff could gradually shift from riparian and marsh to upland and sparse riparian. Shorelines may shift and wetted areas may decrease over time as more water is retained in the upper watershed, but these changes would not significantly degrade biological resources in the region as a whole since the revised hydrology would be a*

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		more natural condition for the arid region. Groundwater seepage would continue to support the major riparian corridors in the Malibu, Santa Clara, Upper Los Angeles, and San Gabriel watersheds. Retention of flows in the upper watershed would even augment these groundwater resources, offsetting any impacts from surface flow reductions. Moreover, improved water quality in the region's drainages and lagoons would be beneficial to habitat health. Overall, implementation of nonstructural BMPs will not significantly impact sensitive species in the EWMP areas. The following sentence has been added to Mitigation Measure BIO-1: The biological survey evaluation shall include an assessment of potential downstream impacts resulting from flow diversions, if such stormwater BMPs are considered as part of Project design. With these changes, the level of significant impact remains less than significant with mitigation; the same as in the Draft PEIR under Impact (4(a).
A4-8	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-7, Water Diversion and Impacts on Beneficial Uses]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #1: Analyze Potential Downstream Impacts from Water Diversion. CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis should include: Study Reach 1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the waterway downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. Changes to Hydrology and Hydraulics 1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet season	See response to Comment A4-7.

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	(November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year. 2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year. 3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach. 4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). *Biological Resources Impact Assessment* 1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). 2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide: a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and	

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	c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. 3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources. 4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts. 5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.	
A4-9	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-7, Water Diversion and Impacts on Beneficial Uses]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Mitigation Measure #2: Adaptive Management Plan for Water Diversions. For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.	The Plan does not include any components that involve surface water diversion. The Plan incorporates stormwater BMPs in accordance with existing LA County ordinances for Low-impact development. See response to comment A4-7.
A4-10	Recommended Potentially Feasible Mitigation Measure(s) [related to Comment A4-7, Water Diversion and Impacts on Beneficial Uses]. CDFW requests the following recommendations and mitigation measures be incorporated into the final CEQA document: Recommendation: Water Rights. CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects	As described in response to comment A4-7, the Plan includes requirements for stormwater management BMP in accordance with LA County's long-standing LID Ordinance, and in compliance with the Upper Los Angeles County EWMP. The following additional clarification regarding water rights as they relate to stormwater BMPs from Section 3.14 of the EWMP PEIR is incorporated by reference into Section 3.19.3.3.2.4, in response to question 19(b): *<u>Local surface water contributes little to the regional water supply; local agriculture relies mostly on groundwater and imported water. Throughout Los Angeles County, stormwater flows are captured for recharge by LACFCD where suitable detention and infiltration facilities are available. These captured flows augment groundwater supplies, but are not directly diverted for beneficial uses such as drinking water. Dry-</u>*

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	under the proposed San Gabriel Valley Greenway Network Implementation Plan.	*weather flows are also captured in some areas for groundwater recharge. Construction of BMPs to detain stormwater and dry-weather flows may reduce flows downstream, thereby reducing access to beneficial uses downstream. Under California law, the State Water Resources Control Board (SWRCB), Division of Water Rights, is responsible for issuing appropriation permits pursuant to Division 2, Part 2 of the California Water Code. The SWRCB maintains a list of water diversion rights issued since the 1920s in Los Angeles County.* *If installation of BMPs (detention, infiltration, and low-flow diversions) would reduce water available to downstream diverters such that their water rights would be impinged, this would be a significant impact of the Program. However, much of the existing diversion permits for Los Angeles County involve streams that are fed by groundwater seepage. These flows, to the extent they still remain, would not be adversely affected by the installation of BMPs since they are fed by natural sources. The urbanization of the County has resulted in channelization of many drainages that are owned and managed by LACFCD…. Dry-weather flows in coastal streams and foothills are largely fed by groundwater seepage or wastewater discharges. These flows would not be affected by infiltration BMPs. However, implementation of Mitigation Measure UTIL-1 would ensure that downstream water rights would not be affected by upstream diversions.* Although Plan impacts are anticipated to be less than significant given the small-scale of the proposed BMPs, MM UTIL-1 from the EWMP PEIR is incorporated by reference, as MM UTIL-2 to ensure that Project proponents consider surface water rights when designing individual projects and selecting an appropriate stormwater BMP. While with the addition of MM UTIL-2, the impact conclusion changes from less than significant to less than significant with mitigation, this change does not represent substantial increase in the severity of the impact that would only be reduced through implementation of the mitigation measure as the Design Guidelines and Standards already require project proponents to consider the most suitable stormwater management option for

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		individual projects, which would necessitate considering water rights and downstream users. MM UTIL-2 Evaluate Downstream Beneficial Uses: Prior to selection of a stormwater BMP, project proponents shall evaluate the potential for impacts to downstream beneficial uses, including surface water rights, and shall not select BMPs that result in preventing access to previously appropriated surface water downstream.
A4-11	Issue: The Project may impact riparian habitat. Specific impacts: The Project may result in temporary or permanent loss of riparian resources. Why impacts would occur: According to PEIR Chapter 3.4, Biological Resources, the Project area contains riparian vegetation communities. This includes southern willow scrub, oak riparian woodland, and alluvial fan scrub. Only relic and fragmented riparian habitat remain along the significantly channelized, engineered, and urbanized lower and middle San Gabriel River and Rio Hondo. Over 90 percent of southern California's coastal riparian habitat have been lost (USACE 2015). The remaining fragments of riparian habitat contribute significantly to the integrity of regional hydrologic connectivity, biodiversity, and habitat connectivity and wildlife movement between significant ecological areas, including the Santa Monica Mountains, the Verdugo Hills, and nationally significant San Gabriel Mountains National Monument (USACE 2015). These vegetation communities could be impacted during project construction and subsequent operational activities. This could result in temporary or permanent loss of riparian habitat. Vegetation communities may also be impacted through changes to hydrology (e.g., amount of flow) and hydraulics (e.g., wetted perimeter and depth). These changes may occur if a project modifies the channel, constructs bridges across a channel, or installs water diversion structures. Willow riparian habitat may be impacted if reduced flow leads to lower water depth or receding shoreline. Preliminary work of the Los Angeles River Flows Project show that black willow seedling mortality increases as water depth decreases	Potential direct and indirect impacts to riparian habitats within the Plan Area and adjacent to potential projects are described in Section 3.4.3.3.2 in response to question 4(b). As described on page 281 of the Draft PEIR: *If any wetlands and/or jurisdictional aquatic resources are identified within the project footprint, then the project proponent would be required to obtain the required permits in compliance with Section 404 (issued by the USACE) and Section 401 (issued by the LARWQCB) of the federal CWA and/or Porter-Cologne Water Quality Control Act, and Section 1600 of the California Fish and Game Code. The project proponent would be required to implement all avoidance and mitigation measures and conditions included in the permits approved by the resource agencies.* Accordingly, any compensatory mitigation for impacts would be specified in the appropriate permit by the applicable regulatory agency as part of regulatory compliance. See response to comment A4-7.

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	(SWRCB 2019). Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016). The Project PEIR does not adequately analyze the potential impacts to riparian habitat and associated fauna from Project-related alterations to hydrology and hydraulics. Evidence impacts would be significant: The Project may impact riparian habitat not only within the construction footprint of individual project components, but also any riparian habitat downstream. Therefore, loss of remaining riparian habitat could affect regional hydrologic, habitat, and wildlife connectivity, and increase threats/stressors on regional biodiversity. Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species. Recommended Potentially Feasible Mitigation Measure(s): Mitigation Measure #1: Mitigation for Project Impacts to Riparian Habitat. CDFW recommends that LACPW modify Mitigation Measure BIO-12 Desktop Review and Conduct a Jurisdictional Delineation to include the underlined language: "[…] If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures <u>and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. Impacts that result in a permanent loss of stream natural resources within an earthen channel, bank, or associated riparian habitat will be mitigated at a minimum 3:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the Project area limits. Mitigation for impacts to streams and riparian habitat shall be provided within the Project area and/or along the same watershed as the original impact. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall</u>	

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	<u>further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted."</u>	
A4-12	Issue: The Project could impact sensitive species protected under CESA and ESA or designated as California Species of Special Concern. Specific impacts: Subsequent projects conducted under this Project could impact species including but not limited to, Braunton's milk-vetch, Nevin's barberry, thread-leaved brodiaea, slender-horned spineflower, Crotch's bumble bee, monarch butterfly, arroyo chub, southwestern pond turtle, Southern California legless lizard, coastal whiptail, red-diamond rattlesnake, two-striped gartersnake, burrowing owl, coastal cactus wren, southwestern willow flycatcher, American peregrine falcon, yellow-breasted chat, coastal California gnatcatcher, yellow warbler, least Bell's vireo, Townsend's big-eared bat, and western red bat. Project activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality, a significant impact on these imperiled species. The Project may also result in a loss of breeding and/or foraging habitat. Why impact would occur: The Project area contains suitable habitat and recent documented occurrences for these sensitive species. Project activities include vegetation removal, surface water diversion, dewatering, drilling, grading, construction, and recreational use. Project activities could create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. After construction activities are completed, the Project could continue to impact these species through an increase in noise from heavier road use and closer access by recreational trail users. The increase of shading from new bridges could result in the decline or loss of vegetated habitat for riparian birds and other species.	Comment noted. The proposed revisions to MM BIO-1 have been incorporated into the Final PEIR to provide additional specificity regarding biological surveys. The revisions provide additional clarity for the mitigation and would not result in a new impact or increase the severity of the identified impact. The impact conclusion remains less than significant with mitigation.

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	The Project has proposed a series of pre-construction surveys (though Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5 among others) to mitigate for potential impacts on sensitive special status species. However, these measures as proposed do not provide sufficient protections to avoid or minimize Project impacts. CDFW is unable to determine the extent of impacts based on the desktop biological analysis conducted for this Project to date. Absent survey data, CDFW and the general public is unable to provide meaningful avoidance, minimization, or mitigation measures related to special status plant resources. Evidence impact would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5 proposed may not (1) provide a sufficiently large buffer to avoid take, (2) commit the Project to mitigation particularly if take occurs, (3) adopt specific performance standards the mitigation will achieve, nor (4) identify the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4). CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. A California Species of Special Concern (SSC) is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria: is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;	

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	is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed; is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or, has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2025a). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW. Recommended Potentially Feasible Mitigation Measure(s) Mitigation Measure #1: Species-specific Surveys Methods and Reporting. CDFW recommends LACPW modify Mitigation Measure BIO-1 Desktop Review and Biological Surveys to include the underlined language: "Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special	

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	status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required." Mitigation Measure #2: Burrowing Owl Survey Methods and Reporting. CDFW recommends LACPW modify Mitigation Measure BIO-3 Conduct Burrowing Owl Pre-construction Surveys by removing the strikethrough language and including the underlined language: "Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending	

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	500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with protocols currently accepted by CDFW ~~guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)~~. If burrowing owl or their sign are observed, the project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a fully executed take authorization prior to any activity that may result in take of CESA-protected species." Mitigation Measure #3: Pre-construction Bat Surveys. CDFW recommends LACPW modify Mitigation Measure BIO-4 Conduct Pre-construction Special Status Bat Surveys by removing the strikethrough language and including the underlined language: Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~ 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and/or acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.	

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A4-13	Funding. CDFW grant programs fund projects that sustain, restore, and enhance California's fish, wildlife, plants, and their habitats. Please visit CDFW Grant Opportunities for more information (CDFW 2025b).	Comment noted.
A4-14	State Wildlife Action Plan (SWAP) 2015. The SWAP 2015 describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California (CDFW 2015). Prior to finalizing the PEIR, CDFW recommends LACPW review the SWAP and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the SWAP. CDFW recommends LACPW consider Chapters 5.5 South Coast Province and Chapter 6 Anadromous Fish. Also, CDFW recommends the final PEIR refer to the SWAP 2015 so project-level planning is consistent with the objectives and recommendations in the SWAP 2015.	Discussion of the SWAP has been added to Section 3.4.2.2.6, as follows: “State Wildlife Action Plan: The State Wildlife Action Plan describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California. The Plan was originally drafted in 2015 and an update to the plan was released as a draft for public review in March 2025. Conservation strategies relevant to the Plan Area are included in Chapter 5.5, South Coast Province, and Chapter 6, Anadromous Fish.”
A4-15	Mitigation and Monitoring Reporting Plan. CDFW recommends the Project’s environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project’s mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).	Comment noted. Where indicated in the responses A4-1 and A4-2, the final Mitigation Monitoring and Reporting Plan has been revised to include additional clarifications to MM BIO-1 and MM BIO-9. Individual responses to the additional suggested mitigation measures and why the County has declined incorporation of these measures is provided in the responses above.
A4-16	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected	Comment noted. The analyses in the Draft PEIR are based on desktop review from existing databases. Any additional data and surveys would be conducted on a project-by-project basis. MM BIO-1 has been amended to include a requirement to require reporting to the CNDDB.

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	during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form4. LACPW should ensure data collected for the preparation of the Draft PEIR is properly submitted.	
A4-17	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #1: Recreational Impact Analysis and Mitigation Planning. LACPW shall include measures under Mitigation Measures BIO-9 (or where appropriate) whereby individual subsequent project proponents shall analyze impacts of recreational activities on biological resources. At a minimum, an analysis shall include: 1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and 2) Future project proponents shall prepare a site-specific operations recreation plan based on the expected recreational usage for the purpose of sufficiently mitigating recreational impacts on biological resources. Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency (LACPW)	See response to A4-1
A4-18	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #2: Adopt Design Best Practices to Address Recreational Impacts. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent project proponents shall implement design practices that best avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project should restrict or modify trails,	See response to A4-3

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	trail dimensions, number of trails, spatial arrangement of trails, access points, and all recreation-related structures to avoid sensitive areas. All existing and new outdoor lighting shall be designed, installed, and maintained in a manner that minimizes impacts on biological resources. CDFW recommends the following design guidelines for outdoor lighting: 1) Light Output Limits. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber color spectrum. Light fixtures shall be designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety. 2) Vehicle Light Barriers. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway. 3) Reflective Signs and Road Striping. Retroreflectivity of signs and road stripping shall be implemented throughout the project to reduce the need for electrical lighting. 4) Light Pole Modifications and Shielding. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential	

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	for light pollution caused by decreasing the number of light output sources in sensitive areas. 5) Light Fixture Locations. No lighting shall be installed within 250 feet of suitable habitat for sensitive species. Access to trails, paths, or other recreational facilities near suitable habitat shall be closed at night. Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-19	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #3: Adopt Minimum Setbacks. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.	See response to A4-1
A4-20	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #4: Implement Best Management Practices to Minimize Recreational Impacts LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate best management practices (BMPs) if avoidance is not feasible. Examples of BMPs could include sound barriers, visual barriers, or wildlife-viewing blinds. An appropriate BMP should consider the species and intensity of recreational use proposed. Timing – Prior to finalizing CEQA document	See response to A4-1

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	Responsible Party – Lead Agency	
A4-21	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #5: Lake and Streambed Alteration Notification CDFW recommends LACPW modify Mitigation Measure BIO-12 Desktop Review and Conduct a Jurisdictional Delineation, to include the underlined language: "A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season	See response to A4-6

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	<u>(April through October), and both above-average and below-average water year."</u> Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-22	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #6: Analyze Potential Downstream Impacts from Water Diversion. CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis should include: Study Reach 2) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the waterway downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. Changes to Hydrology and Hydraulics 5) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet season (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year. 6) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average	See response to A4-7

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	water year, dry season/above-average water year, and dry season/below-average water year. 7) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach. 8) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). Biological Resources Impact Assessment 6) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). 7) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide: a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. 8) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources.	

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	9) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts. 10) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions. Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-23	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #7: Adaptive Management Plan for Water Diversions. For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger. Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	See response to A4-7 and A4-9
A4-24	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #8: Mitigation for Project Impacts to Riparian Habitat CDFW recommends that LACPW modify Mitigation Measure BIO-12 Desktop Review and Conduct a Jurisdictional Delineation to include the underlined language: "[…] If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and <u>appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. Impacts that result in a permanent loss of stream natural resources within an earthen channel, bank, or associated riparian habitat will be mitigated at a minimum 3:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the Project area limits. Mitigation for impacts to streams and riparian habitat shall be provided within the Project area and/or along the same watershed as the original impact. Compensatory mitigation shall increase</u>	

Comment #	Comment Text	Comment Response
	if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted." Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-25	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #9: Species-specific Surveys Methods and Reporting. CDFW recommends LACPW modify Mitigation Measure BIO-1 Desktop Review and Biological Surveys to include the underlined language: "Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW	See response to A4-11

Comment #	Comment Text	Comment Response
	for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required." Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-26	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #10: Burrowing Owl Survey Methods and Reporting CDFW recommends LACPW modify Mitigation Measure BIO-3 Conduct Burrowing Owl Pre-construction Surveys by removing the strikethrough language and including the underlined language: "Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with protocols currently	See response to A4-12

Comment #	Comment Text	Comment Response
	accepted by CDFW ~~guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)~~. If burrowing owl or their sign are observed, the project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species." Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-27	CDFW provides the following language to be incorporated into the MMRP for the project. Mitigation Measure #11: Pre-construction Bat Surveys. CDFW recommends LACPW modify Mitigation Measure BIO-4 Conduct Pre-construction Special Status Bat Surveys by removing the strikethrough language and including the underlined language: Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~ 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and/or acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures	See response to A4-12

Comment #	Comment Text	Comment Response
	determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted. Timing – Prior to finalizing CEQA document Responsible Party – Lead Agency	
A4-28	Recommendation #1: Mitigation for Impacts to Streams. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity. Timing – Prior to start of Project construction activities Responsible Party – Permittee	See response to A4-6
A4-29	Recommendation #2: Water Rights CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects	See response to A4-10

Comment #	Comment Text	Comment Response
	under the proposed San Gabriel Valley Greenway Network Implementation Plan. Timing – Prior to start of Project construction activities Responsible Party - Permittee	

2.3.5 Comment Letter I1: Steve Mateer

Comment #	Comment Text	Comment Response
I1-1	I am writing in support of approving the PEIR. I want to commend Public Works staff for their effort and time to this project. With the exception of the A Line Extension, this will be one of the most transformative projects in the SGV. The Greenway Network is essential to improving the economic, environmental, and social equity issues in the San Gabriel Valley. As a resident of Glendora, these trails will allow myself and my family a healthy and car-free way to move around the SGV. Additionally and more importantly, these trails will offer a safe means of transportation for those who cannot afford to drive and are reliant on public transportation or active transportation. These trails will also help improve air quality and reduce greenhouse gas emissions. For these reasons, I strongly urge the LA County Board of Supervisors to approve the PEIR.	Comment noted.

SECTION 3 Clarifications and Modifications to the Draft PEIR

3.1 Introduction

The following clarifications and revisions update the Draft PEIR in response to the comments received during the public review period and due to minor clarifications made by the County. These changes, which have been incorporated into the Draft PEIR, constitute the Final PEIR, to be presented to the County of Los Angeles Board of Supervisors with a recommendation for certification. These modifications clarify, amplify, or make insignificant changes to the PEIR. No additional changes were made to the PEIR that were not prompted by comments.

Revisions to the PEIR have not resulted in new significant impacts or mitigation measures or increased the severity of an impact. As noted below, none of the criteria for recirculation set forth in State CEQA Guidelines Section 15088.5(a) have been met, and recirculation of the PEIR is not required.

> *State CEQA Guidelines Section 15088.5(a):*
>
> *(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. "Significant new information" requiring recirculation include, for example, a disclosure showing that:*
>
> *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
>
> *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
>
> *(3) A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
>
> *(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

The revisions compiled in this chapter do not constitute "significant new information" noted in Section 15088.5(a) because of the following:

- No new significant environmental impacts have been identified following the publication of the Draft PEIR. Although new mitigation measures have been added based on input from commenters to ensure impacts remain less than significant, these new measures would not in and of themselves result in significant impacts nor do they represent that a new impact was identified. Rather, the measures provide for greater assurance of less-than-significant impacts.
- None of the modifications would result in a substantial increase in impacts already identified. Rather, the revisions are designed to further reduce the potential for significant impacts.
- No new alternatives have been identified that would clearly lessen impacts.

- The PEIR is not fundamentally or basically inadequate and conclusory in nature. The PEIR compiles information available at the time of publication to assist in evaluating the values and risks of moving forward with the SGV Greenway Network Implementation Plan. The PEIR as an advanced planning tool is meant to set the stage for future analysis of projects within the program as they are proposed for implementation.

For certain changes shown below, an explanation is provided for why the change or revision does not constitute "significant new information." All other changes shown below are considered minor clarifications or technical changes and are not substantive (i.e., new significant information not previously analyzed). Therefore, pursuant to CEQA Guidelines Section 15088.5, recirculation of the EIR is not required.

3.2 Clarifications and Modifications

Corrections or revisions to the Draft PEIR are presented below by chapter or section. The original text is shown in italics. Deleted text is shown in ~~strikethrough~~, and new text is in shown in <u>underline</u>.

3.2.1 Changes to Executive Summary

The following change has been made to Section ES-1, page 1. This change provides additional clarification regarding the boundary of the Plan Area to explicitly state that the Plan does not include any in-channel work. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

The SGV includes the approximately 200 square mile valley that lies east of the City of Los Angeles, within Los Angeles County. The SGV is bounded by the San Gabriel Mountains to the north, the San Rafael Mountains to the west, Puente Hills to the south, and the Chino Hills and San Jose Hills to the east.

The Project area evaluated in this PEIR is defined as the 140 linear miles of District ROW and adjacent parcels along the washes and creeks in the SGV in eastern Los Angeles County (Plan Area; Figure ES-1). <u>The Plan Area does not extend into any SGV tributary channels, and the Plan does not include any components involving in-channel work.</u> *As part of the Plan preparation, the County reviewed each waterbody for opportunities and constraints and developed conceptual designs for 10 example projects along the most optimal reaches.*

3.2.2 Changes to Section 1, Introduction

There are no changes to Section 1, Introduction.

3.2.3 Changes to Section 2, Project Description

The following change has been made to Section 2.2.1, page 12. This change provides additional clarification regarding the boundary of the Plan Area to explicitly state that the Plan does not include any in-channel work. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information":

The SGV includes the approximately 200 square mile valley that lies east of the City of Los Angeles, within Los Angeles County. The SGV is bounded by the San Gabriel Mountains to the north, the San Rafael Mountains to the west, Puente Hills to the south, and the Chino Hills and San Jose Hills to the east.

The Project area evaluated in this PEIR is defined as the 140 linear miles of District ROW and adjacent parcels along the washes and creeks in the SGV in eastern Los Angeles County (Plan Area; Figure ES-1). The Plan Area does not extend into any SGV tributary channels, and the Plan does not include any components involving in-channel work. As part of the Plan preparation, the County reviewed each waterbody for opportunities and constraints and developed conceptual designs for 10 example projects along the most optimal reaches.

The following change has been made to Section 2.3.1.3, page 56. This change provides additional clarification regarding regulatory authorizations required for railroad crossings. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute “significant new information”,

Channel crossings could be facilitated by utilizing existing roads and railroad tracks, which may require addition of safety signals, crosswalk signage, fencing, and other infrastructure meant to protect cyclists and pedestrians from road and rail traffic and discourage trespassing onto the railroad right-of-way. Channel crossings could also be achieved with dedicated pedestrian bridges. Some pedestrian bridges are present already and could be converted to multi-use crossings by removing stairs and adding ramps.

Important considerations for roadway crossings include ensuring safe and appropriate distances from the nearest intersection or routing the crossing to an intersection with signals and/or highly visible crosswalks when possible. For railroad crossings, California Public Utilities Commission (CPUC) coordination would be required. Any proposed modifications to any at-grade crossing would require authorization from the CPUC. Also, for any currently grade-separated crossing, CPUC authorization would be required if the project proposes to modify the structure of the crossing or create a new crossing above or beneath the railroad corridor. Examples of existing crossings in the Plan Area as well as an example of a controlled intersection are shown in Figures 2-28 through 2-31.

3.2.4 Changes to Section 3, Environmental Setting, Impacts, and Mitigation Measures

3.2.4.1 Changes to Section 3.0, Introduction to Impact Analysis

There are no changes to Section 3.0, Introduction to Impact Analysis.

3.2.4.2 Changes to Section 3.1, Aesthetics

There are no changes to Section 3.1, Aesthetics.

3.2.4.3 Changes to Section 3.2, Agriculture and Forestry Resources

There are no changes to Section 3.2, Agriculture and Forestry Resources.

3.2.4.4 Changes to Section 3.3, Air Quality

There are no changes to Section 3.3, Air Quality.

3.2.4.5 Changes to Section 3.4, Biological Resources

The following change has been made to Section 3.4.2.2, page 235. This change has been made in response to a commenter’s request and provides additional information regarding the regulatory framework within California. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

3.4.2.2.6 State Wildlife Action Plan

The State Wildlife Action Plan describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California. The Plan was originally drafted in 2015 and an update to the plan was released as a draft for public review in March 2025. Conservation strategies relevant to the Plan Area are included in Chapter 5.5, South Coast Province, and Chapter 6, Anadromous Fish.

The following change has been made to Section 3.4.3.3.1.1, page 270. This change provides additional clarification regarding the potential downstream impacts of specific stormwater management BMPs included as potential options within the Plan. The additional analysis incorporated by reference from the EWMP PEIR does not constitute a new impact, nor increase the severity of any previously discussed impacts in the PEIR. The analysis further supports the conclusion of less than significant with mitigation. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

Operation of stormwater management BMPs could also impact existing habitat for birds if it reduced flows into Plan Area waterways. As described in Section 11.2 of the Design Guidelines and Standards, the Plan would require an individual project to include a stormwater BMP to infiltrate and/or treat a site's stormwater quality design volume (SWQDv) where new infrastructure (greenway and other impervious surface) is proposed with a preference for nature-based solutions. Further, as required by Section 11.3 of the Design Guidelines and Standards, BMP implementation will depend on available ROW and specific greenway project formulation which may limit the use of some types of BMPs. BMP selection should be at the design engineer's discretion considering project objectives and constraints but is subject to District approval. In cases where specific pollutants are of concern, the appropriate treatment technology should be implemented on a case-by-case basis. Accordingly, if BMPs such as infiltration galleries or catchment basins were installed as part of an individual project implemented under the Plan, they would be small-scale (up to 0.29 acres as stated in Section 2.3.1.4). Although the Plan does not include or proposed any large scale regional or centralized structural BMPs, the potential impact of such regional and centralized structures were analyzed in detail in the EWMP PEIR, and the following language from the EWMP PEIR is incorporated by reference to provide additional clarification:

> *BMPs designed to retain peak storm flows including regional BMPs would have no impact on downstream biological resources, since peak storm flows do not support perennial vegetation. The natural hydrology of the region experiences ephemeral flows that respond to seasonal precipitation, conveying water from the upper watersheds to the lower watersheds quickly.*
>
> *Urbanization has increased the speed of water flows through the system. The BMPs are designed to slow water flows and return to a hydrology closer to predevelopment conditions. However, some drainages have developed new perennial flow regimes that support vegetation as a result of landscape runoff or wastewater discharges. Some of this vegetation may support special-status species including least Bell's vireo or southwest*

> *willow flycatcher, particularly in suburban areas. If BMPs designed to retain dry-weather flows reduced the wetted area of drainages or completely eliminated flows in certain drainages that support riparian habitat, impacts to sensitive species would be significant….. The primary threat to the local ecology in Los Angeles County is urban development. Returning the local hydrology to a more natural condition would occur over time and would result in improved natural habitat functions with little direct impact to protected sensitive species.*
>
> *Although riparian habitat may flourish in certain urban drainages, the vegetation is often a nuisance. Many soft-bottom channels are periodically cleared of vegetation by the Los Angeles County Flood Control District under a permit from the USFWS and CDFW that requires compensation elsewhere in the watershed. The reduction in perennial flows in most channels may result in less "choking" of flood control channels with nuisance vegetation, resulting in flood control benefits.*
>
> *Furthermore, in many cases, it is difficult to attribute the health and extent of a wetted area supporting vegetation to specific Municipal Separate Storm Sewer System (MS4) discharge points. Individual BMP installation may reduce flows, but not eliminate wetted areas supporting certain habitat areas, resulting in no immediate observed reduction in riparian cover. Over time, the addition of BMPs into suburban watersheds may reduce vegetation within certain drainages slowly as the cumulative effects of multiple BMPs combine to limit dry-weather flows. The gradual reduction in habitat would allow sensitive species to adapt to the changing conditions, particularly avian species such as least Bell's vireo would relocate to other nesting areas as conditions change. This is not dissimilar to natural conditions where riparian areas change over time with large flood flows. Although this gradual decrease in dry-weather flows in the region may reduce riparian vegetation in certain locations, the overall reduction is not expected to be significant, since the high-value habitats are limited and largely dependent on groundwater or wastewater treatment discharges….The smaller distributed BMPs [such as those included in the Plan] would not result in significant impacts.*

With regard to non-structural BMPs, the EWMP PEIR provides the following analysis which is incorporated by reference:

> *Many of the non-structural BMPs would result in the reduction of dry-weather urban runoff that could reduce perennial flows in local drainages. Returning the local hydrology to a more natural condition would occur overtime and would reduce overall wetted areas within minor drainages and swales throughout the region. Local riparian and lake features that rely on urban runoff could gradually shift from riparian and marsh to upland and sparse riparian. Shorelines may shift and wetted areas may decrease over time as more water is retained in the upper watershed, but these changes would not significantly degrade biological resources in the region as a whole since the revised hydrology would be a more natural condition for the arid region. Groundwater seepage would continue to support the major riparian corridors in the Malibu, Santa Clara, Upper Los Angeles, and San Gabriel watersheds. Retention of flows in the upper watershed would even augment these groundwater resources, offsetting any impacts from surface*

flow reductions. Moreover, improved water quality in the region's drainages and lagoons would be beneficial to habitat health. Overall, implementation of nonstructural BMPs will not significantly impact sensitive species in the EWMP areas.

The following change has been made to Section 3.4.3.3.1, page 271. This change provides additional clarification to the mitigation measure as requested by CDFW. The changes to the mitigation measure would not result in any new significant impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

MM BIO-1: Desktop Review and Biological Surveys. *Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. The biological survey evaluation shall include an assessment of potential downstream impacts resulting from flow diversions, if such stormwater BMPs are considered as part of Project design. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct an assessment using a desktop review with considerations for the project type and specific location (i.e. previous soil disturbances). Based on an initial assessment, the need to conduct multiple rare plant surveys throughout the growing season for any given year shall be determined at that time. If determined to be necessary based on the need for biological surveys, surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.*

The following changes have been made to Section 3.4.3.3.1, page 272. These changes provide additional clarification to the mitigation measures as requested by CDFW. The changes to the mitigation measures would not result in any new significant impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

MM BIO-3: Conduct Burrowing Owl Pre-construction Surveys. *Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with ~~guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)~~ protocols currently accepted by CDFW. If burrowing owl or their sign are observed, the Project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the Project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA. The Project proponent shall have a fully executed take authorization prior to any activity that may result in take of CESA-protected species.*

MM BIO-4: Conduct Pre-construction Special Status Bat Surveys. *Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.*

The following change has been made to Section 3.4.3.3.1, page 274. This change provides additional clarification to the mitigation measure as requested by CDFW. The changes to the mitigation measure would not result in any new significant impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

MM BIO-9: Operations Recreation Plan*. The Operations Recreation Plan shall include requirements for the following measures, as applicable, to be implemented for by the project proponent in areas where recreational opportunities will be created:*

- *Signage requiring pets to be on leash*
- *Pet dropping/waste bag dispensers and disposal stations*
- *Foot-wiping stations with signage explaining the purpose of the station (to prevent the spread of invasive weeds that degrade natural habitats that species depend on)*
- *Wildlife-proof waste bins*

- *Educational interpretive kiosks/signage (e.g., how to respect wildlife and habitats, stay on trail signs, identifying sensitive areas, pick up trash and fishing line, pick up after pets; opportunities to view wildlife)*
- *Incorporation of signage to avoid ESAs around sensitive wildlife/habitat features*
- *Prevention of fertilizer runoff*
- *Management of unauthorized uses through coordination with local resources*
- *Trail design – where avoidance is not feasible, and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features.*
- *Setbacks and restrictions – where avoidance is not feasible, and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, and could include restrictions on the size of gathering areas at pavilions, etc.*

Proper handling of any non-native plant species removed during operations and maintenance activities to prevent sprouting or regrowth; development of methods to ensure that non-native plant seeds are not spread during plant removal and that plants will be removed prior to flowering, if feasible.

The qualified biologist shall review all proposed temporary and permanent Project elements – such as fencing, gates, and guardrails – for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.

3.2.4.6 Changes to Section 3.5, Cultural Resources

There are no changes to Section 3.5, Cultural Resources.

3.2.4.7 Changes to Section 3.6, Energy

There are no changes to Section 3.6, Energy.

3.2.4.8 Changes to Section 3.7, Geology and Soils

There are no changes to Section 3.7, Geology and Soils.

3.2.4.9 Changes to Section 3.8, Greenhouse Gas Emissions

There are no changes to Section 3.8, Greenhouse Gas Emissions.

3.2.4.10 Changes to Section 3.9, Hazards and Hazardous Materials

There are no changes to Section 3.9, Hazards and Hazardous Materials.

3.2.4.11 Changes to Section 3.10, Hydrology and Water Quality

The following change has been made to Section 3.10.3.3.1.1, page 690, and Section 3.10.3.3.2.1, page 692. This change provides additional clarification to impact analysis presented and does not identify any new significant impacts or increase the severity of identified impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute “significant new information”.

As noted in Section 2, any excavations would be limited to two to six feet below ground surface. Typical groundwater elevation in the Plan Area is 61.9 feet, well below any anticipated excavations. Therefore, the potential for project construction to encounter groundwater is highly unlikely. Nevertheless, in the very unlikely event that ~~In the event~~ groundwater is encountered during construction, dewatering would be conducted on a temporary basis during the construction phase and would not result in a loss of water that would substantially deplete groundwater supplies.

The following change has been made to Section 3.10.3.3.2.1, page 693. This change provides additional clarification regarding the source of water supply for construction activities. This change does not result in any new significant impacts nor increase the severity of the identified impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

The water supply for construction activities (e.g., dust control, concrete mixing, material washing) would most likely come from nearby hydrants ~~and existing surface supplies,~~ and/or would be trucked to the proposed sites.

3.2.4.12 Changes to Section 3.11, Land Use and Planning

There are no changes to Section 3.11, Land Use and Planning.

3.2.4.13 Changes to Section 3.12, Mineral Resources

There are no changes to Section 3.12, Mineral Resources.

3.2.4.14 Changes to Section 3.13, Noise

There are no changes to Section 3.13, Noise.

3.2.4.15 Changes to Section 3.14, Population and Housing

There are no changes to Section 3.14, Population and Housing.

3.2.4.16 Changes to Section 3.15, Public Services

There are no changes to Section 3.15, Public Services.

3.2.4.17 Changes to Section 3.16, Recreation

There are no changes to Section 3.16, Recreation.

3.2.4.18 Changes to Section 3.17, Transportation

The following change has been made to Section 3.17.3.3.1, page 995. This change provides additional clarification to the mitigation measure to acknowledge the authorization required by Caltrans. The changes to the mitigation measure would not result in any new significant impacts. This clarification does not change any of the impact analyses or conclusions as presented in the Draft PEIR, and does not constitute "significant new information".

MM TR-2: Restrict Lane Closures and Maintain Access. *The project proponent shall restrict all necessary lane closures or obstructions associated with construction activities to off-peak periods to reduce traffic* *delays. Project work within or abutting a Caltrans right of way shall not occur unless authorized by an encroachment permit. Lane closures shall not occur between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., unless otherwise authorized by the responsible public agency with jurisdiction over the affected street or highway through the issuance of an encroachment permit.*

3.2.4.19 Changes to Section 3.18, Tribal Cultural Resources

The following change has been made to Section 3.18.1.1, page 1023. This change provides additional clarification resulting from Public Works communication with the Gabrieleño Band of Mission Indian – Kizh Nation (Kizh Nation). The communication included a telephone meeting and subsequent email correspondence held in good faith. This information does not change any of the impact analyses or conclusions as presented in the Draft PEIR and does not constitute "significant new information".

The Native American people known to have inhabited the SGV, in which the Plan Area is located, and surrounding region are referred to as the Gabrieliño, The Gabrieliño, Gabrieleño, or San Gabrieleño (herein referred to as Gabrieleño). The term "Gabrielino" follows the Spanish custom of naming local tribes after nearby missions, in reference to Mission San Gabriel Arcangel. Many contemporary Gabrieleño identify themselves by the name "Tongva" and others refer to themselves as "Kizh." Prior to European colonization, the Gabrieleño~~-Tongva~~ occupied a diverse area that included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Kroeber 1925). The Gabrieleño language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrieleño~~-Tongva~~ Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply, specialized processing sites, formal cemeteries, and trade networks with local and nonlocal groups. It is believed that they initially practiced a seasonal strategy, moving from location to location exploiting various food resources, but with technological advances they were able to maintain permanent year-round villages with reliance on acorns and marine resources. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrieleño~~-Tongva~~ are estimated to have had a population numbering around 5,000 in the precontact period (Kroeber 1925) and occupied a large portion of what is now Los Angeles County, including the SGV and San Fernando Valley, as well as areas within Orange County. Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of downtown, and around the Los Angeles River drainage (Gumprecht 2001). Maps produced by early explorers indicate that at least 26 Gabrieleño villages were within close proximity to known Los Angeles River courses, while an additional 18 villages were within reasonably close proximity to the river (Gumprecht 2001).

Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game were hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith, 1978). The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrieleño~~-Tongva~~; the 1769 expedition of Gaspar de Portolá also *passed through Gabrieleño~~-Tongva~~ territory (Bean and Smith 1978). Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrieleño~~-Tongva~~ descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.*

3.2.4.20 Changes to Section 3.19, Utilities/Service Systems

The following change has been made to Section 3.19.3.3.2.4, page 1151. This change provides additional clarification to the impact analysis presented regarding the effect of stormwater BMPs on water supply. The addition of the mitigation measure would not result in additional significant impacts, and would further ensure that impacts are less than significant through additional evaluation of potential constraints on selection of an appropriate stormwater BMP for an individual project. As the Plan already requires project proponents to include appropriate stormwater BMPs based on site-specific constraints of individual projects, the addition of the mitigation measure and change of the impact conclusion from less than significant to less than significant with mitigation does constitute a substantial increase in the severity of an environmental impact as presented in the Draft PEIR and does not constitute “significant new information”.

> *<u>Local surface water contributes little to the regional water supply; local agriculture relies mostly on groundwater and imported water. Throughout Los Angeles County, stormwater flows are captured for recharge by LACFCD where suitable detention and infiltration facilities are available. These captured flows augment groundwater supplies, but are not directly diverted for beneficial uses such as drinking water. Dry-weather flows are also captured in some areas for groundwater recharge. Construction of BMPs to detain stormwater and dry-weather flows may reduce flows downstream, thereby reducing access to beneficial uses downstream. Under California law, the State Water Resources Control Board (SWRCB), Division of Water Rights, is responsible for issuing appropriation permits pursuant to Division 2, Part 2 of the California Water Code. The SWRCB maintains a list of water diversion rights issued since the 1920s in Los Angeles County.</u>*
>
> *<u>If installation of BMPs (detention, infiltration, and low-flow diversions) would reduce water available to downstream diverters such that their water rights would be impinged, this would be a significant impact of the Program. However, much of the existing diversion permits for Los Angeles County involve streams that are fed by groundwater seepage. These flows, to the extent they still remain, would not be adversely affected by the installation of BMPs since they are fed by natural sources. The urbanization of the County has resulted in channelization of many drainages that are owned and managed by LACFCD…. Dry-weather flows in coastal streams and foothills are largely fed by groundwater seepage or wastewater discharges. These flows would not be affected by infiltration BMPs. However, implementation of Mitigation Measure UTIL-1 would ensure that downstream water rights would not be affected by upstream diversions.</u>*

<u>Although Plan impacts are anticipated to be less than significant given the small-scale of the proposed BMPs, MM UTIL-1 from the EWMP PEIR is incorporated by reference, as MM UTIL-2 to ensure that Project proponents consider surface water rights when designing individual projects and selecting an appropriate stormwater BMP.</u>

UTIL-2: Prior to selection of a stormwater BMP, project proponents shall evaluate the potential for impacts to downstream beneficial uses, including surface water rights, and shall not select BMPs that result in preventing access to previously appropriated surface water downstream.

3.2.4.21 Changes to Section 3.20, Wildfire

There are no changes to Section 3.20, Wildfire.

3.2.4.22 Changes to Section 4, Other CEQA Considerations

There are no changes to Section 4, Other CEQA Considerations.

3.2.4.23 Changes to Section 5, Alternatives

There are no changes to Section 5, Alternatives.

3.2.4.24 Changes to Section 6, List of Preparers

There are no changes to Section 6, List of Preparers.

3.2.4.25 Changes to Section 7, References

There are no changes to Section 7, References.

Appendix A Comments Received on the Draft PEIR

Ariana Villanueva

From: Steven Mateer <stevenmateer@gmail.com>
Sent: Friday, April 18, 2025 10:36 AM
To: PW-SWQD_CEQA
Subject: SGV Greenway Network Implementation Plan PEIR Comments

Hello,

I1-1 I am writing in support of approving the PEIR. I want to commend Public Works staff for their effort and time to this project. With the exception of the A Line Extension, this will be one of the most transformative projects in the SGV. The Greenway Network is essential to improving the economic, environmental, and social equity issues in the San Gabriel Valley. As a resident of Glendora, these trails will allow myself and my family a healthy and car-free way to move around the SGV. Additionally and more importantly, these trails will offer a safe means of transportation for those who cannot afford to drive and are reliant on public transportation or active transportation. These trails will also help improve air quality and reduce greenhouse gas emissions. For these reasons, I strongly urge the LA County Board of Supervisors to approve the PEIR.

Sincerely,
Steven Mateer

STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

May 5, 2025 ENVR 20250400003

Ariana Villanueva
Los Angeles County Public Works
PO Box 1460
Alhambra, CA 91802

Re: San Gabriel Valley Greenway Network Strategic Implementation Plan SCH 2022090340 — *Draft Environmental Impact Report*

Dear Ariana Villanueva:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DIR)* for the proposed San Gabriel Valley Greenway Network Strategic Implementation Plan. The Los Angeles County Department of Public Works (County) is the lead agency.

The County developed the San Gabriel Valley Greenway Network Implementation Plan (Plan) as a framework to study, identify, and implement potential projects within existing Los Angeles County Flood Control District (District) rights-of-way in the San Gabriel Valley (SGV) into a network of bicycle, equestrian, and pedestrian pathways. As part of the plan's goals, both the County and/or local agencies within the proposed area will utilize the plan as a guide to construct greenway paths, such as multi-use, pedestrian, bike, and equestrian trails and paths, as well as other improvements including stormwater management infrastructure and community greenspaces. The draft EIR investigated 10 potential example projects within the District right-of-way but acknowledges that the entire project area encompasses approximately 140 miles of right-of-way along with adjacent parcels along the San Gabriel and Rio Hondo rivers as well as their creeks and washes.

A1-1 CPUC recognizes the current plan does not define any immediate construction or respective project boundaries, but as the example projects describe, future developments will likely cross through railroad crossings both at-grade and grade-separated in the SGV. Any proposed modifications to any at-grade crossing will require authorization from the CPUC. Additionally, CPUC recommends that at any at-grade crossing the future paths and trails will cross, the project team(s) implement pedestrian treatments including pedestrian warning devices and gates as well as channelization, and to bring the crossings up to current standards and in compliance with ADA requirements. For any currently grade-separated crossing, CPUC authorization is required if any project intends to modify the structure of the crossing or create a new crossing above or beneath the railroad corridor. Any projects adjacent and parallel to a railroad corridor should also ensure proper fencing and deterrence are installed to discourage trespassing onto railroad right-of-way.

A1-2 Any proposed crossing improvement project must also conform to the goals of the CPUC's Environmental and Social Justice Action Plan. This includes improving safety and access to transportation, improving local air quality and public health, and expanding outreach and public participation opportunities in disadvantaged communities. For more information, please visit https://www.cpuc.ca.gov/esjactionplan.

RCEB is available to discuss any potential safety impacts or concerns at this location and address any questions from the State or the Applicant.

If you have any questions, please contact Richard Le at (213) 999-9053, or richard.le@cpuc.ca.gov.

Sincerely,

Anh Truong
Senior Utilities Engineer (Supervisor)
Rail Crossings Engineering Branch
Rail Safety Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Megan Schwartz, Catalyst Environmental Solutions Corporation, mschwartz@ce.solutions

MainSanGabrielBasin
WATERMASTER

May 28, 2025

Ms. Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
P.O. Box 1460
Alhambra, CA, 91802-1460

RE: Notice of Availability for Draft Environmental Impact Report (EIR)
San Gabriel Valley Greenway Strategic Implementation Plan (SGVGNSIP)

Dear Ms. Villanueva:

The Main San Gabriel Basin Watermaster (Watermaster) has received and reviewed the "Notice of Availability for Draft Environmental Impact Report (EIR): San Gabriel Valley Greenway Strategic Implementation Plan (SGVGNSIP)", issued on April 15, 2025. The Draft was prepared by Catalyst Environment for the Los Angeles County Public Works (County) and addressed to California Office of Planning and Research and Research, Responsible and Trustee Agencies and Interested Parties. It is our understanding that the County proposes to design "a network of interconnected, multi-use community green ways" by updating flood systems along the San Gabriel and Rio Hondo River sheds. This Plan is a continuation of multiple previous planning and design efforts by the County. General and specific comments regarding the Greenway Network Plan are summarized below.

The Watermaster is a court appointed agency which manages the groundwater and surface water supplies in the San Gabriel Valley, including coordination with regulatory agencies regarding water quality.

General Comments

Surface Water Diversion:

A2-1

The Plan discusses 10 prime conceptual locations for the Greenway Network, referred to as "Tier 1" sites within the document. These potential sites include San Gabriel Valley tributary channels. It is important to note that the surface water rights for the San Gabriel River, the Rio Hondo, and the tributaries to these rivers are accounted for, and no water shall be diverted from these washes, nor any streamlines that feed the San Gabriel River and Rio Hondo, except as provided by the existing surface water rights as exercised by the holders of those water rights, who are the following: Main San Gabriel Basin Producers with surface water rights under the Main San Gabriel Basin Judgment, San Gabriel River Protective Association with State Water Resources Control Board surface water rights and the City of Glendora with State Water Resources Control Board surface water rights.

Specific Comments

A2-2

1. Section 2.2.1.6 "San Dimas Wash/Puddingstone/Live Oak", page 17 2nd paragraph states "…The underlying parcels of these tributaries are mostly owned by the District; however, some of the easements only allow for flood control operation and would need to be modified for a greenway to be operated…"

   Comment:
   How will this modification affect flood control? In what ways will the County find interim ways to allow flood control operation during greenway construction?

A2-3

2. Section 2.3.1.1.4 "Anticipated Operations", page 51 1st paragraph states "…Hazardous materials used for maintenance would be minimal and may consist of commonly used hazardous materials such as solvents for cleaning, paints, fuels for equipment, and approved herbicides or pesticides…"

   Comment:
   Here it is stated that hazardous materials, while kept to a minimum, would be used for maintenance. These hazardous materials cause serious concern due to the potential risk of contaminants that could enter surface water flows and/or percolate into the groundwater basin. Because the Plan is designed to reduce overall impervious surface area, there is an even higher possibility of these hazardous materials affecting the quality of groundwater. What are the County's specific plans to prevent this occurrence?

A2-4

3. Section 2.3.1.4 "Storm Water Management", page 59 2nd paragraph states "…Reducing impervious surface area is an overall beneficial change to the landscape and would allow more water to enter the soil…"

   Comment:
   As stated previously, an increase to pervious surfaces may result in issues with water quality. Please address how the County plans to prevent this.

A2-5

4. Section 2.3.1.4.1.3 "Site-scale Detention", page 61 "…Site-scale detention facilities can reduce peak flows and improve water quality by storing water in a basin before slowly draining the water through an orifice to the downstream waterway…"

   Comment:
   New detention basins can allow for water stored to be contaminated by pollutants due to storm water runoff along the ground. Because the plan is to drain the water to a downstream water way, a risk of contamination to the waterways arises. The exact plan of these detention basins is unclear in the EIR (lacking location maps, site plans, operation plans, etc). In addition, these proposed detention basins may be duplicative of downstream facilities. Please provide more details.

A2-6

5. Section 3.10.3.3 "Plan Impacts", page 689 1st paragraphs states "…One of the Plan goals is the integration of stormwater management/capture, groundwater recharge, and water quality improvement into future greenways…"

Comment:
This section requires a more detailed description of the capturing of stormwater, the recharge of groundwater and water quality improvement into future greenways.

6. Section 3.10.3.3.2.1 "Greenway Paths and Greenway Amenities + Pocket Parks and Greenspace Safe Crossings + Stormwater Management", page 692 1st paragraph states "…In the event groundwater is encountered during construction, dewatering would be conducted on a temporary basis during the construction phase…"

Comment:

A2-7

This appears to suggest that during the construction phase of the project, excavation will possibly encounter the water table. This is a serious concern, as any excavation should not have the potential risk of encountering any groundwater and be close to the water table. It is understood that excavation is limited to two to six feet below existing grade for these systems. However, it should still be noted that Watermaster will protect the storage capacity of the Main San Gabriel Basin aquifer as being consistent with the historic high groundwater elevation. As shown in Figure 1, the historic high groundwater elevation recorded at the Baldwin Park Key Well (Key Well) was measured at 325.8 feet above mean sea level (amsl) in 1944 and considered the appropriate highest groundwater elevation to use for planning purposes. The reference point elevation of Key Well in 1944 was measured at 387.7 feet amsl. Therefore, the groundwater depth would be about 61.9 feet [387.7 feet amsl – 325.8 feet amsl = 61.9 feet] when the Main San Gabriel Basin is at its known highest groundwater elevation. The groundwater elevation in the Main San Gabriel Basin is constantly changing and has the potential to return to the historic high of 325.8 feet amsl at the Key Well due to local weather conditions, imported water deliveries, replenishment opportunities, and other factors Watermaster may consider maintaining the Main San Gabriel Basin. No pumping of groundwater should be considered without Watermaster review, accounting, and monitoring. Some questions that arise are What kind of dewatering measures are being discussed here? What are the County's plans to prevent water quality contaminants into the groundwater? Needs a more detailed description.

7. Section 3.10.3.3.2.1 "", page 693 1st paragraph states "…The water supply for construction activities (e.g., dust control, concrete mixing, material washing) would most likely come from nearby hydrants and existing surface supplies and/or would be trucked to the proposed site…"

Comment:

A2-8

This section states that the water supply for construction activities would most likely come from existing "surface water" supplies. Water rights for surface water supplies from the San Gabriel River and the Rio Hondo River are all accounted for and no water shall be diverted from any surface supplies in the San Gabriel Valley Watershed. The County should contact the Watermaster prior to considering use of any existing surface water supplies. In addition, it is stated that in compliance with South Coast Air Quality Management District Rule 403, dust control measures would be implemented to prevent movement offsite into adjacent waters. Watermaster requests a detailed description of these measures and how the County would ensure that surface water is protected.

Watermaster appreciates the opportunity to comment on this Draft EIR. Please feel free to contact the Watermaster office should you have any questions.

Sincerely,

Kelly Gardner
Executive Officer
Main San Gabriel Basin Watermaster

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3574
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TTY 711
www.dot.ca.gov

Making Conservation
a California Way of Life

May 29, 2025

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
P.O. Box 1460
Alhambra, CA 91802

RE: San Gabriel Valley Greenway Network Strategic Implementation Plan – Draft Program Environmental Impact Report (PEIR)
SCH# 2022090340
GTS #07-LA-2022-04796
Vic. LA Multiple

Dear Ariana Villanueva,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The proposed Plan provides a guide to develop an active transportation and recreational corridor for bicyclists, pedestrians, and equestrians; beautify the LACFCD ROW; and enhance stormwater management and natural habitats around river channels, stormwater channels, washes, and creeks in the SGV. Beneficial Project Elements that are covered in the PEIR include greenway paths and amenities (e.g., shade structures, bike racks, informational signs, picnic tables, benches, trash receptacles, drinking fountains, decorative gates, lighting, etc.); pocket parks and greenspaces; safe crossings at roads, railroad tracks, and channels; and stormwater management opportunities (e.g., permeable pavements, bioswales, stormwater detention basins, etc.). Detailed impacts resulting from both short-term construction and long-term operation of the Plan are identified in the PEIR, and all elements are analyzed at a program level.

After reviewing the PEIR, Caltrans has the following comments:

Caltrans acknowledges and supports the San Gabriel Valley Greenway Network and all that it will do to help California meet its climate, transportation, and livability goals. Caltrans planners and engineers are available to partner on implementing design elements that improve safety and mobility for people walking, riding bikes, or taking transit throughout the Plan area. By removing barriers and improving safety, this Plan can make transportation mode shift easier for Californians and help the State meet its policy goals to reduce the number of trips made by driving, Greenhouse Gas (GHG) emissions, and encourage active modes of travel.

A3-1 Please note, that any project work occurring within, or abutting Caltrans ROW will require an encroachment permit, and all concerns and requirements must be addressed. Final design requirements for any proposed changes to infrastructure within or along Caltrans Right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, Right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed.

Caltrans District 7 Office of Permits contact information:
Mailing Address: 100 S Main Street, Ste 100 Los Angeles, CA 90012
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday
Phone: 213-897-3631 | E-mail: D7.Permits@dot.ca.gov

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-LA-2022-04796.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 30, 2025

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
PO Box 1460
Alhambra, CA 91802
SWQD_CEQA@pw.lacounty.gov

Subject: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR THE SAN GABRIEL VALLEY GREENWAY NETWORK STRATEGIC IMPLEMENTATION PLAN, SCH NO. 2022090340, LOS ANGELES COUNTY, CA

Dear Ariana Villanueva:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Programmatic Environmental Impact Report (PEIR) from Los Angeles County Public Works (Lead Agency; LACPW) for the San Gabriel Valley Greenway Network Strategic Implementation Plan (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

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

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Los Angeles County Public Works (LACPW)

Objective: The objective of the Project is to provide program-level direction for development along the San Gabriel River, the Rio Hondo, and adjacent tributaries within the San Gabriel Valley, eastern Los Angeles County. Primary Project activities include the development of an active transportation and recreational corridor through a network of paths. The Project also includes objectives for the beautification of Los Angeles County Flood Control District (LACFCD) rights-of-way (ROWs), enhancement of stormwater management, and enhancement of natural habitat around streams in the San Gabriel Valley. The main Project component is a network of shared paths. This "Greenway Network" may include shared pedestrian and bike paths, or shared paths with separated equestrian trails, in segments up to 5 miles long and 24 feet wide. Other Project components may include (1) amenities, (2) pocket parks and greenspaces, (3) safe crossings, and (4) stormwater management infrastructure. Greenway amenities may include fencing, railings, guard rails, barriers, decorative gates, privacy screens, lighting, seating, shade structures, equestrian amenities, bike parking, informational signage, trash receptacles, public art, community gardens, emergency call boxes, restrooms, water stations, kiosks, and community message boards. Pocket parks and greenspaces may include the expansion of existing parks or the creation of new parks between 1 and 25 acres in area. Safe crossings may include crosswalks, bridges, signals, signage over existing roads, intersections, flood control channels, and railroad tracks up to 400 feet long and 8 feet wide. Stormwater management infrastructure may include permeable pavement, green streets, bioretention facilities, constructed wetlands, subsurface infiltration facilities, extended detention basins, and other green infrastructure or low-impact development practices. The Project provides program-level analysis and does not include project-specific or site-specific analyses.

Location: The Project area includes the entire 200-square-mile San Gabriel Valley of Los Angeles County. The proposed Greenway Network would largely follow alongside the San Gabriel River, the Rio Hondo, and several other tributaries. Project locations

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[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

could include segments of the following tributaries: Alhambra Wash, Arcadia Wash, Big Dalton Wash, Eaton Wash, Little Dalton Wash, Puente Creek, Rubio Wash, San Dimas Wash/Puddingstone Channel/Live Oak Wash, San Jose Creek, Santa Anita Wash, Sawpit Wash, Thompson Creek, and Walnut Creek. This Draft PEIR evaluates the Project area as defined as 140 linear miles of LACFCD ROWs and adjacent parcels along streams within the San Gabriel Valley. The Project provides program-level regional planning and does not include any site-specific locations for individual actions or component projects.

Biological Setting: The Project site and adjacent areas includes primarily urban and suburban development with smaller patches of undeveloped land. The primary watershed in the San Gabriel Valley is the San Gabriel River watershed. The headwaters of the San Gabriel River originate in the San Gabriel Mountains to the north beyond the limits of the Project area. Within the Project site, reaches of the San Gabriel River and its tributaries consist of natural earthen-bottom channels and concrete-lined trapezoidal or box channels. Riparian habitat and coastal sage scrub habitat are present within the Whittier Narrows area. Sensitive natural communities potentially occurring within the general Project area include Riversidean alluvial fan sage scrub, walnut forest, California walnut woodland, canyon live oak ravine forest, southern coast live oak riparian forest, and southern sycamore - alder riparian woodland. Sensitive species potentially occurring within the general Project area include Braunton's milk-vetch (*Astragalus brauntonii*; Endangered Species Act (ESA) endangered; California Rare Plant Rank (CRPR) 1B.1), Nevin's barberry (*Berberis nevinii*; ESA endangered; CESA endangered; CRPR 1B.1), thread-leaved brodiaea (*Brodiaea filifolia*; ESA threatened, CESA endangered; CRPR 1B.1), slender-horned spineflower (*Dodecahema leptoceras*; ESA endangered, CESA endangered; CRPR 1B.1), Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), monarch butterfly (*Danaus plexippus*; ESA proposed threatened), arroyo chub (*Gila orcuttii*; California Species of Special Concern (SSC)), southwestern pond turtle (*Actinemys pallida*; ESA proposed threatened; SSC), Southern California legless lizard (*Anniella stebbinsi*; SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), red-diamond rattlesnake (*Crotalus ruber*; SSC), two-striped gartersnake (*Thamnophis hammondii*; SSC), burrowing owl (*Athene cunicularia*; CESA candidate endangered; SSC), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; SSC), southwestern willow flycatcher (*Empidonax traillii extimus*; ESA endangered; CESA endangered*),* American peregrine falcon (*Falco peregrinus anatum*), yellow-breasted chat (*Icteria virens*; SSC), coastal California gnatcatcher (*Polioptila californica californica*; ESA threatened; SSC), yellow warbler (*Setophaga petechia*; SSC), and least Bell's vireo (*Vireo bellii pusillus*; ESA endangered; CESA endangered), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), and western red bat (*Lasiurus blossevillii*; SSC).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist LACPW in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Impacts of Recreation on Wildlife

A4-1

Issue: The Project may impact biological resources because of increased visitor usage and recreation.

Specific impact: The Project may cause local extirpation of wildlife from otherwise suitable habitat. Direct impacts on wildlife may include energetic costs to the animal, nest abandonment, reduced reproductive success, and reduced fitness.

Why impact would occur: The Project proposes to create recreational opportunities where opportunities do not currently exist. These opportunities include pedestrian/bike/equestrian trails, equestrian facilities, lookouts, boardwalks, channel access points, pocket parks, and pavilions. Increased visitor usage and recreation along the San Gabriel River, the Rio Hondo, and its tributaries has potential to impact wildlife and habitat through a variety of ways, including:

- Increased numbers of people and pets;
- Increased area of influence;
- Increased noise levels;
- Increased artificial outdoor lighting;
- Increased trash or pet waste;
- Introduction of unnatural food sources via trash and trash receptacles;
- Loss of habitat due to erosion from non-official footpaths; and
- Loss of habitat due to introduction or spread of invasive plant species.

Recreation and increased human activities can have the following effects on wildlife:

- Non-consumptive recreation can lead to detrimental changes in animal behavior, reproduction, growth, and immune system function (Lucas 2020).
- Human presence can instill strong fear in wild animals, which may adjust their activity to avoid contact with humans. Such risk avoidance can have important nonlethal effects on animal physiology and fitness. This shift may have negative and far-reaching ecological consequences (Gaynor et al. 2018; Mitrovich et al. 2020).
- Human activities that result in escape or avoidance behaviors may increase the probability of a bird being detected by a predator, increase intraspecific aggression in colonial species, expose bird chicks and eggs to adverse

environmental conditions that can cause embryo death, and divert energy from feeding or reproduction to defensive behaviors (Hillman et al. 2015).

- Blue tit (*Cyanistes caeruleus*) nestlings near recreation facilities develop slower and fledge with low body mass and poor body condition (Remacha et al. 2016).
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) is sensitive to pedestrian and vehicle traffic. An approaching distance of 3 meters and 2.8 meters during the pre-nesting and nesting season, respectively, alert Belding's savannah sparrows to take flight (Fernandez-Juricic et al. 2009).
- Being approached by a person may trigger a change in the behavior or physiological processes in a bird (e.g., flight responses or increased heart rate). Although these responses tend to be short in duration, they can have longer term effects as is the case of breeding birds being flushed from nests leaving eggs or chicks vulnerable to predation (Steven et al. 2011).
- Relatively 'low' impact activities such as walking or hiking can still have negative effects on birds (Steven et al. 2011).

A4-1

- Increased noise may alter or mask the auditory signals required for information exchange in birds (Hillman et al. 2015).
- Some species of birds are sensitive to off-trail activities, particularly dog walking (greater area of influence) (Miller et al. 2001).
- Artificial light at night can disrupt wildlife behavior. Even residential-scale white LED flood lights in a residential setting can disturb bat foraging activities from a 25- to 75-meter radius (Seewagen et al. 2023).
- Patterns of wildlife habitat use can be disrupted by disturbances occurring outside of regular human activity, such as large recreation events, off-trial visitor behavior, or the proliferation of new social trails, even in areas that traditionally see high levels of visitor use (Mitrovich et al. 2020).

The Project has proposed to Mitigation Measure BIO-9 *Operations Recreation* Plan, to mitigate for potential impacts of recreation on biological resources. Mitigation Measure BIO-9 proposes signage warning recreational users to avoid certain environmentally sensitive areas. However, signage alone may be insufficient to deter or prevent recreational users from accessing sensitive areas. Seasonal closures of public access have been proposed in the LACPW's Los Angeles River Master Plan to mitigate for potential impacts on wildlife during certain times of year (e.g., bird nesting season). However, wildlife could use or occupy habitat year-round. Wildlife could become displaced or extirpated from otherwise functional habitat where recreational activities are created or increased. Signage and seasonal closures alone may be insufficient to mitigate for the Project's potential to displace or extirpate wildlife.

Evidence impact may be significant: Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

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

A4-2

Mitigation Measure #1: Recreational Impact Analysis and Mitigation Planning. LACPW shall include measures under Mitigation Measure BIO-9 (or where appropriate) whereby individual subsequent project proponents shall analyze impacts of recreational activities on biological resources. At a minimum, an analysis shall include:

1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and
2) potential for wildlife entanglement in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity.

Future project proponents shall prepare a site-specific operations recreation plan based on the expected recreational usage for the purpose of sufficiently mitigating recreational impacts on biological resources.

A4-3

Mitigation Measure #2: Adopt Design Best Practices to Address Recreational Impacts. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent project proponents shall implement design practices that best avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project should restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, access points, and all recreation-related structures to avoid sensitive areas. All existing and new outdoor lighting shall be designed, installed, and maintained in a manner that minimizes impacts on biological resources. CDFW recommends the following design guidelines for outdoor lighting:

1) *Light Output Limits*. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber color spectrum. Light fixtures shall be designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety.
2) *Vehicle Light Barriers*. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types

A4-3

should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway.

3) *Reflective Signs and Road Striping*. Retroreflectivity of signs and road stripping shall be implemented throughout the project to reduce the need for electrical lighting**.**
4) *Light Pole Modifications and Shielding*. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for light pollution caused by decreasing the number of light output sources in sensitive areas.
5) *Light Fixture Locations*. No lighting shall be installed within 250 feet of suitable habitat for sensitive species. Access to trails, paths, or other recreational facilities near suitable habitat shall be closed at night.

A4-4

Mitigation Measure #3: Adopt Minimum Setbacks. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.

A4-5

Mitigation Measure #4: Implement Best Management Practices to Minimize Recreational Impacts. LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate best management practices (BMPs) if avoidance is not feasible. Examples of BMPs could include sound barriers, visual barriers, or wildlife-viewing blinds. An appropriate BMP should consider the species and intensity of recreational use proposed.

A4-6

Comment #2: Lake and Streambed Alteration Agreement

Issue: The Project may impact streams.

Specific impacts: The Project may result in temporary or permanent modifications to a stream.

Why impacts would occur: The Project may modify the San Gabriel River, the Rio Hondo, and several other tributaries within the San Gabriel Valley by modifying the channel, modifying existing vegetation within the stream, installing new vegetation within the stream, installing or modifying bridges, culverts, or other infrastructure, or installing surface water diversion structures. Diversion structures may obstruct water flow and change the bed and channel of a stream (confinement). Water diversion may adversely affect the existing stream pattern, potentially resulting in substantial erosion or siltation within the project area and downstream.

The Project proposes Mitigation Measure BIO-12 *Desktop Review and Conduct a Jurisdictional Delineation* to mitigate for potential impacts to streams. This Mitigation Measure calls for the avoidance of streams in favor of sites that have been previously disturbed or developed. However, Project activities in disturbed and developed areas may still require notification and permitting from CDFW. CDFW is particularly concerned about potential alterations to streams from the diversion of surface waters.

A4-6

Evidence impacts would be significant: Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

The construction of diversion devices such as deployable barriers and inflatable dams, and conveyance of water structures within a stream is subject to notification under Fish and Game Code section 1602. The ongoing operations and maintenance of instream storm flow diversion devices and conveyance of water structures is also subject to notification under Fish and Game Code section 1602 once the devices are constructed. Also, the diversion of stormwater and/or dry weather runoff that flows within streams or that have overflown the banks of streams, is subject to notification under Fish and Game Code section 1602.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Lake and Streambed Alteration Notification. CDFW recommends LACPW modify Mitigation Measure BIO-12 *Desktop Review and Conduct a Jurisdictional Delineation*, to include the underlined language:

“A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year."

A4-6

Recommendation: Mitigation for Impacts to Streams. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Comment #3: Water Diversion and Impacts on Beneficial Uses

Issue: The Project may divert surface stormwater and dry season flows from the San Gabriel River, the Rio Hondo, and several other tributaries in the San Gabriel Valley.

A4-7

Specific impact: Diverting stormwater and dry season flows into stormwater catchment basins, bioretention facilities, or infiltration galleries may reduce the availability and extent of water flow within a stream. There could be changes to the hydrologic regime both within a project area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year.

Why impacts would occur: The Draft PEIR does not provide sufficient analysis as to whether the Project, specifically the "integrated stormwater management practices" "green infrastructure" and "low impact development", would impact biological resources both within a project area and downstream.

Biological Resources: Both the concrete-lined and soft-bottom portions of the San Gabriel River, the Rio Hondo, and their tributaries support biological resources. The concrete-lined portions of these streams are regionally significant, especially in a dense urban environment with substantial loss or alteration of the natural hydrologic regime and river ecosystems. Where these streams overtop the concrete-lined low-flow channel, the resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. These streams provide habitat for hundreds of bird species, making portions of them birding hotspots. The least Bell's vireo, a federal ESA and CESA-listed endangered species, has been documented at the Whittier Narrows among other areas within the Project setting. Least Bell's vireo depends on willow (*Salix* genus) riparian habitat. The San Gabriel River supports woody vegetation such as black willow (*Salix gooddingii*), Fremont cottonwood (*Populus fremontii*), and arroyo willow (*Salix laevigata*) (USACE 2015).

A4-7

Flow reductions, especially dry season flow, could impact beneficial uses directly or indirectly through habitat modifications. Diverting water during the dry season could reduce the availability and extent of shallow water sheet flow. This could potentially impact algae and benthic invertebrates, and eventually birds. Willow riparian habitat may be impacted if flow reductions lead to receding shoreline or lower water depth. Loss of suitable habitat may impact sensitive species such as least Bell's vireo.

Seasonality: The Draft PEIR does not analyze the potential significance of water diversion depending on the season. During the dry season, typically April through September in southern California, the San Gabriel River is largely influenced by urban runoff and discharge from several flood control dams (Cogswell, San Gabriel, Morris, etc.). Diverting water could be significant during the dry season and could either significantly reduce water flow or result in complete loss of water flow.

Drought: The Draft PEIR does not analyze the potential significance of water diversion during a below-normal water year. Since 2000, the longest duration of drought in California lasted between 2011 and 2019 (USGS 2021) and in southern California, between 2012 through 2016 (Los Angeles Almanac 2021). The 2017-2018 rainfall season was below normal and the driest for Los Angeles since 2006-2007 (Los Angeles Almanac 2021). Diverting water during a below-normal rainfall year may significantly reduce water flow or result in complete loss of water flow.

Evidence impacts would be significant: Changes to hydrology and channel morphology, both within a project area and downstream, are reasonable potential direct

A4-7

and indirect physical changes in the environment. Said changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project's significant, or potentially significant, direct, and indirect impacts on biological resources. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in a project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW, USFWS, and/or National Marine Fisheries Service (NMFS).

Recommended Potentially Feasible Mitigation Measure(s):

A4-8

Mitigation Measure #1: Analyze Potential Downstream Impacts from Water Diversion. CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis should include:

Study Reach

1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the waterway downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater.

Changes to Hydrology and Hydraulics

1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet season (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.
2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year.
3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.
4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).

A4-8

Biological Resources Impact Assessment

1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).
2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide:
   a. A summary of species-specific habitat requirements;
   b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and
   c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts.
3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources.
4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts.
5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.

A4-9

Mitigation Measure #2: Adaptive Management Plan for Water Diversions. For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.

A4-10

Recommendation: Water Rights. CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the proposed San Gabriel Valley Greenway Network Implementation Plan.

Comment #4: Impacts on Riparian Habitat

Issue: The Project may impact riparian habitat.

Specific impacts: The Project may result in temporary or permanent loss of riparian resources.

Why impacts would occur: According to PEIR Chapter 3.4, *Biological Resources*, the Project area contains riparian vegetation communities. This includes southern willow scrub, oak riparian woodland, and alluvial fan scrub. Only relic and fragmented riparian habitat remain along the significantly channelized, engineered, and urbanized lower and middle San Gabriel River and Rio Hondo. Over 90 percent of southern California's coastal riparian habitat have been lost (USACE 2015). The remaining fragments of riparian habitat contribute significantly to the integrity of regional hydrologic connectivity, biodiversity, and habitat connectivity and wildlife movement between significant ecological areas, including the Santa Monica Mountains, the Verdugo Hills, and nationally significant San Gabriel Mountains National Monument (USACE 2015).

A4-11

These vegetation communities could be impacted during project construction and subsequent operational activities. This could result in temporary or permanent loss of riparian habitat. Vegetation communities may also be impacted through changes to hydrology (e.g., amount of flow) and hydraulics (e.g., wetted perimeter and depth). These changes may occur if a project modifies the channel, constructs bridges across a channel, or installs water diversion structures. Willow riparian habitat may be impacted if reduced flow leads to lower water depth or receding shoreline. Preliminary work of the Los Angeles River Flows Project show that black willow seedling mortality increases as water depth decreases (SWRCB 2019). Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016). The Project PEIR does not adequately analyze the potential impacts to riparian habitat and associated fauna from Project-related alterations to hydrology and hydraulics.

Evidence impacts would be significant: The Project may impact riparian habitat not only within the construction footprint of individual project components, but also any riparian habitat downstream. Therefore, loss of remaining riparian habitat could affect regional hydrologic, habitat, and wildlife connectivity, and increase threats/stressors on regional biodiversity. Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Mitigation for Project Impacts to Riparian Habitat. CDFW recommends that LACPW modify Mitigation Measure BIO-12 *Desktop Review and Conduct a Jurisdictional Delineation* to include the underlined language:

A4-11

"[…] If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. Impacts that result in a permanent loss of stream natural resources within an earthen channel, bank, or associated riparian habitat will be mitigated at a minimum 3:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the Project area limits. Mitigation for impacts to streams and riparian habitat shall be provided within the Project area and/or along the same watershed as the original impact. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted."

A4-12

Comment #5: Impacts to Special Status Species

Issue: The Project could impact sensitive species protected under CESA and ESA or designated as California Species of Special Concern.

Specific impacts: Subsequent projects conducted under this Project could impact species including but not limited to, Braunton's milk-vetch, Nevin's barberry, thread-leaved brodiaea, slender-horned spineflower, Crotch's bumble bee, monarch butterfly, arroyo chub, southwestern pond turtle, Southern California legless lizard, coastal whiptail, red-diamond rattlesnake, two-striped gartersnake, burrowing owl, coastal cactus wren, southwestern willow flycatcher, American peregrine falcon, yellow-breasted chat, coastal California gnatcatcher, yellow warbler, least Bell's vireo, Townsend's big-eared bat, and western red bat. Project activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality, a significant impact on these imperiled species. The Project may also result in a loss of breeding and/or foraging habitat.

Why impact would occur: The Project area contains suitable habitat and recent documented occurrences for these sensitive species. Project activities include vegetation removal, surface water diversion, dewatering, drilling, grading, construction, and recreational use. Project activities could create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. After construction activities are completed, the Project could continue to impact these species through an increase in noise from heavier road use and closer access by recreational trail users. The increase of shading from new bridges could result in the decline or loss of vegetated habitat for riparian birds and other species.

The Project has proposed a series of pre-construction surveys (though Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5 among others) to mitigate for potential impacts on sensitive special status species. However, these measures as proposed do not provide sufficient protections to avoid or minimize Project impacts. CDFW is unable to determine the extent of impacts based on the desktop biological analysis conducted for this Project to date. Absent survey data, CDFW and the general public is unable to provide meaningful avoidance, minimization, or mitigation measures related to special status plant resources.

Evidence impact would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5 proposed may not (1) provide a sufficiently large buffer to avoid take, (2) commit the Project to mitigation particularly if take occurs, (3) adopt specific performance standards the mitigation will
A4-12 achieve, nor (4) identify the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4).

CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5.

A California Species of Special Concern (SSC) is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2025a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing.

These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

A4-12

Mitigation Measure #1: Species-specific Surveys Methods and Reporting. CDFW recommends LACPW modify Mitigation Measure BIO-1 *Desktop Review and Biological Surveys* to include the underlined language:

"Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required."

Mitigation Measure #2: Burrowing Owl Survey Methods and Reporting. CDFW recommends LACPW modify Mitigation Measure BIO-3 *Conduct Burrowing Owl Pre-construction Surveys* by removing the strikethrough language and including the underlined language:

"Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with protocols currently accepted by CDFW ~~guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)~~. If burrowing owl or their sign are observed, the project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a fully executed take authorization prior to any activity that may result in take of CESA-protected species."

A4-12

Mitigation Measure #3: Pre-construction Bat Surveys. CDFW recommends LACPW modify Mitigation Measure BIO-4 *Conduct Pre-construction Special Status Bat Surveys* by removing the strikethrough language and including the underlined language:

Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~ 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and/or acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.

ADDITIONAL COMMENTS

A4-13

Funding. CDFW grant programs fund projects that sustain, restore, and enhance California's fish, wildlife, plants, and their habitats. Please visit CDFW Grant Opportunities for more information (CDFW 2025b).

A4-14

State Wildlife Action Plan (SWAP) 2015. The SWAP 2015 describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California (CDFW 2015). Prior to finalizing the PEIR, CDFW recommends LACPW review the SWAP and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the SWAP. CDFW recommends LACPW consider Chapters 5.5 South Coast Province and Chapter 6 Anadromous Fish. Also, CDFW recommends the final PEIR refer to the SWAP 2015 so project-level planning is consistent with the objectives and recommendations in the SWAP 2015.

A4-15

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

A4-16

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[3] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4].

LACPW should ensure data collected for the preparation of the Draft PEIR is properly submitted.

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[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the Draft PEIR to assist LACPW in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that LACPW has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to David Lin[5],Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:
5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Steve Gibson, Senior Environmental Scientist (Supervisory)
David Lin, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Recreational Impact Analysis and Mitigation Planning LACPW shall include measures under Mitigation Measure BIO-9 (or where appropriate) whereby individual subsequent project proponents shall analyze impacts of recreational activities on biological resources. At a minimum, an analysis shall include: 1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and 2) potential for wildlife entanglement in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity. Future project proponents shall prepare a site-specific operations recreation plan based on the expected recreational usage for the purpose of sufficiently mitigating recreational impacts on biological resources.	Prior to finalizing CEQA document	Lead Agency (LACPW)
Mitigation Measure #2: Adopt Design Best Practices to Address Recreational Impacts LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent project proponents shall implement design practices that best avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project should restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, access points, and all	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	**Timing**	**Responsible Party**
recreation-related structures to avoid sensitive areas. All existing and new outdoor lighting shall be designed, installed, and maintained in a manner that minimizes impacts on biological resources. CDFW recommends the following design guidelines for outdoor lighting: 1) *Light Output Limits*. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber color spectrum. Light fixtures shall be designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety. 2) *Vehicle Light Barriers*. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway. 3) *Reflective Signs and Road Striping*. Retroreflectivity of signs and road stripping shall be implemented throughout the project to reduce the need for electrical lighting. 4) *Light Pole Modifications and Shielding*. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and		

Mitigation Measure	Timing	Responsible Party
determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for light pollution caused by decreasing the number of light output sources in sensitive areas. 5) *Light Fixture Locations*. No lighting shall be installed within 250 feet of suitable habitat for sensitive species. Access to trails, paths, or other recreational facilities near suitable habitat shall be closed at night.		
Mitigation Measure #3: Adopt Minimum Setbacks LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.	Prior to finalizing CEQA document	Lead Agency
Mitigation Measure #4: Implement Best Management Practices to Minimize Recreational Impacts LACPW shall provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate best management practices (BMPs) if avoidance is not feasible. Examples of BMPs could include sound barriers, visual barriers, or wildlife-viewing blinds. An appropriate BMP should consider the species and intensity of recreational use proposed.	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #5: Lake and Streambed Alteration Notification CDFW recommends LACPW modify Mitigation Measure BIO-12 *Desktop Review and Conduct a Jurisdictional Delineation*, to include the underlined language: “A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	**Timing**	**Responsible Party**
March), dry season (April through October), and both above-average and below-average water year."		
Mitigation Measure #6: Analyze Potential Downstream Impacts from Water Diversion CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis should include: *Study Reach* 2) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the waterway downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. *Changes to Hydrology and Hydraulics* 5) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet season (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year. 6) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	Timing	Responsible Party
season/below-average water year, dry season/above-average water year, and dry season/below-average water year. 7) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach. *8)* An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). *Biological Resources Impact Assessment* 6) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). 7) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide: a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. 8) A discussion of whether construction, operations, and maintenance of diversion		

Mitigation Measure	**Timing**	**Responsible Party**
devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources. 9) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts. 10) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.		
Mitigation Measure #7: Adaptive Management Plan for Water Diversions For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent project proponents shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.	Prior to finalizing CEQA document	Lead Agency
Mitigation Measure #8: Mitigation for Project Impacts to Riparian Habitat CDFW recommends that LACPW modify Mitigation Measure BIO-12 *Desktop Review and Conduct a Jurisdictional Delineation* to include the <u>underlined</u> language: "[…] If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures<u> and appropriate permits shall be obtained from the USACE, SWRCB or RWQCB, and CDFW, as required. Impacts that result in a permanent loss of stream natural resources within an earthen channel, bank, or associated riparian habitat will be mitigated at a minimum 3:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the Project area limits. Mitigation for impacts to streams and riparian habitat shall be provided within the Project area and/or along the same watershed as the original impact. Compensatory mitigation shall increase if a project would result in permanent</u>	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	**Timing**	**Responsible Party**
loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted."		
Mitigation Measure #9: Species-specific Surveys Methods and Reporting CDFW recommends LACPW modify Mitigation Measure BIO-1 *Desktop Review and Biological Surveys* to include the underlined language: "Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists,	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	Timing	Responsible Party
the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.”		
Mitigation Measure #10: Burrowing Owl Survey Methods and Reporting CDFW recommends LACPW modify Mitigation Measure BIO-3 *Conduct Burrowing Owl Pre-construction Surveys* by removing the strikethrough language and including the underlined language: “Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	Timing	Responsible Party
area, where access is available. Surveys shall be conducted in accordance with protocols currently accepted by CDFW ~~guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)~~. If burrowing owl or their sign are observed, the project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species."		
Mitigation Measure #11: Pre-construction Bat Surveys CDFW recommends LACPW modify Mitigation Measure BIO-4 *Conduct Pre-construction Special Status Bat Surveys* by removing the strikethrough language and including the underlined language: Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~ 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and/or acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified	Prior to finalizing CEQA document	Lead Agency

Mitigation Measure	**Timing**	**Responsible Party**
in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.		
Recommendation #1: Mitigation for Impacts to Streams CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.	Prior to start of Project construction activities	Permittee
Recommendation #2: Water Rights CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in	Prior to start of Project construction activities	Permittee

Mitigation Measure	Timing	Responsible Party
assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the proposed San Gabriel Valley Greenway Network Implementation Plan.		

Appendix B Updated Draft PEIR Appendices

Mitigation Monitoring and Reporting Program: SGV Greenway Network Implementation Plan PEIR

Prepared for: Los Angeles County Department of Public Works

Innovative solutions for a complex world

Catalyst
ENVIRONMENTAL SOLUTIONS

Mitigation Monitoring and Reporting Program

This document constitutes the Mitigation Monitoring and Reporting Program (MMRP) for the San Gabriel Valley (SGV) Greenway Network Implementation Plan Program Environmental Impact Report (PEIR). An MMRP must be adopted by the lead agency "when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 (of the CEQA Guidelines) relative to an EIR or adopted a mitigated negative declaration in conjunction with approving a project. In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects." (CEQA Guidelines Section 15097). As lead agency, the County of Los Angeles, acting through Los Angeles County Department of Public Works (Public Works), has prepared this MMRP for the Program as analyzed in the PEIR (State Clearinghouse No. 2022090340).

The MMRP will be adopted to avoid or mitigate significant effects on the environment resulting from projects carried out by the County under the Plan. It is designed to ensure compliance during implementation of the project. As required by Public Resources Code Section 21081.6, subdivision(a)(2), the custodian and location of the documents constituting the record of proceedings for the Project are Public Works and the Los Angeles County Clerk. The County anticipates that for those projects carried out under the Plan, by entities other than Public Works, the respective lead agency (whether municipality or special district) will adopt this MMRP to avoid or mitigate significant effects on the environment and ensure compliance during project implementation. Pursuant to PRC Sections 21155.2(a) and (b)(2) and Section 21159.28(a), future projects that seek to tier from the PEIR must incorporate the mitigation measures identified herein. The lead agency is responsible for successfully implementing all the mitigation measures in the MMRP, and for ensuring that these requirements are met by the project proponent. Alternatively, if the identified mitigation measure is found to be infeasible based on substantial evidence, the lead agency under CEQA for the future project must incorporate equivalent measures that would avoid or mitigate potential impacts to a less than significant level.

The MMRP provides the following information:

- Mitigation Measures: A description of the feasible mitigation measures for each significant impact identified in the PEIR;
- Timeframe for Compliance: Identifies when a mitigation measure must be implemented/completed;
- Responsible Monitoring Agency: Identifies which entity will oversee implementation and compliance of the mitigation measure;
- Steps to Compliance and Verification: How the mitigation measure shall be implemented and/or verified.

Table 1. Mitigation Monitoring and Reporting Plan

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
Aesthetics			
MM AES-1: Install Construction Fencing for Visual Screening and Security for Construction Lasting Longer than 30 Days. For construction projects lasting greater than 30 days, the project proponent shall require contractors to 1) install neutral color (e.g., green, brown, black, white, tan, navy) perimeter fencing of a minimum height of six feet around construction areas to screen and provide security to pedestrians and other people with a view of the site to reduce views of construction staging areas, grading, and site disturbance.	During plan development prior to construction and materials submitted	A. If construction is anticipated to last more than 30 days, contractors shall be required to install construction fencing.	Lead agency
MM AES-2: Develop and Submit Lighting Plan. The project proponent shall develop a lighting plan consistent with the lighting code and policies of the municipality in which the project is located.	During plan development prior to construction and materials submitted; Ongoing	A. Incorporate lighting measures onto construction site plans.	Lead agency
Air Quality			
MM AQ-1: Emissions Reduction Measures. For projects that would exceed the SCAQMD regional or local thresholds or with an anticipated construction duration of greater than six months that are located within 500 feet of a residence or other sensitive receptor, the following emission reduction measures shall be implemented: • Require the use of electricity from power poles rather than temporary diesel or gasoline powered generators, as feasible. • Minimize vehicle idling time in accordance with the Airborne Toxic Control Measure to Limit Diesel-Fueled	During plan development prior to construction and materials submitted; Prior to construction; During construction	A. Construction plan set shall specify if duration of Project construction and distance from project site to nearest sensitive receptor. B. If applicable, construction plan set shall specify each of the required measures. C. Lead agency to verify through site visit/inspection that all measures are implemented during construction.	Lead agency

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Commercial Motor Vehicle Idling (Title 13, Division 3, Chapter 10, Section 2485). • Minimize equipment idling time in accordance with the In-Use Off-Road Diesel-Fueled Fleets (Title 13, CCR, Section 2449). • Require the use of 2013 model year engines for all diesel-powered vehicles that conform to the United States Environmental Protection Agency's (EPA) *"Emission Standards and Supplemental Requirements for 2007/2010 Model Year Diesel Heavy-Duty Engines and Vehicles"* per 40 CFR 86.007-11 (e.g., material delivery trucks and soil import/export. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the construction period. • Vehicles with a GVWR greater than 14,000 pounds shall comply with the Truck and Bus Regulations (Title 13, California Code of Regulations, Section 2025), the Clean Truck Check Program/Heavy-Duty Vehicle Inspection and Maintenance Program (Title 13, California Code of Regulations, Sections 2195 through 2199.1), and all amendments. All vehicle owners shall register and report on the Truck Regulation Upload, Compliance, and Reporting System (TRUCRS) and report in the Clean Truck Check-Vehicle Inspection System (CTC-VIS) Database to certify regulation compliance. • At a minimum, all internal combustion engines/construction equipment operating shall meet Tier 4 Final CARB/USEPA emission standards per 40 CFR 1039. • All off-road diesel-powered equipment 25 horsepower (hp) or greater shall comply with the In-Use Off-Road Diesel Fueled Fleets Regulations (Title 13, California Code			

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of Regulations, Section 2449) and amendments. Equipment owners shall report on the Diesel Off-Road Online Reporting System (DOORS) to certify regulation compliance. • Where it is determined that construction emissions would exceed the applicable SCAQMD regional thresholds and/or LSTs even with the requirement that all construction equipment meet Tier 4 Final CARB/USEPA emissions standards, the project shall reduce its daily construction intensity (e.g., reducing the amount of equipment used daily, reducing the amount of soil graded/excavated daily) to a level where the project's construction emissions would no longer exceed SCAQMD's regional thresholds and/or LSTs.			
MM AQ-2: Health Risk Assessment and Health Risk Reduction Measures. For projects with construction activities in proximity to an individual sensitive receptor lasting more than two months that: 1) exceed the SCAQMD LSTs and 2) are within 1,000 feet of existing sensitive receptors, as defined by SCAQMD (e.g., residences, daycares), the project proponent shall prepare a site-specific construction and operational Health Risk Assessment. The Health Risk Assessment must identify whether the health risk exposures for adjacent receptors will be less than the SCAQMD project-level thresholds. If the Health Risk Assessment demonstrates that the health risk exposures for adjacent receptors will be less than SCAQMD project-level thresholds, then additional mitigation shall be unnecessary. However, if the Health Risk Assessment demonstrates that health risks will exceed SCAQMD project-level thresholds, additional on- and off-site mitigation, including and not limited to implementation of MM AQ-1: Emission Reduction Measures will be analyzed by the project proponent to help reduce risks to the greatest extent practicable.	During plan development prior to construction and materials submitted; Ongoing	A. Conduct Air Quality Impact Analysis with completed construction health risk assessment. B. If over MM AQ-1 thresholds, air quality analyst shall prepare a mitigation plan subject to lead agency review.	Lead agency

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MM AQ-3: Implement Equestrian Manure Management. For Plan elements that include an equestrian facility, the project proponent shall comply with the following measures: • The facility, including animal stalls and warmup and training areas, will be cleaned at least once per day, including the removal of manure and soiled bedding. • Manure and soiled bedding will either be incorporated into composting by the end of the day or temporarily stockpiled prior to incorporation into the composting system. • Stockpiled material in containment vessels will be covered with a lid or tarp. Containment vessels will be located at the farthest feasible distance from nearby residents and/or sensitive receptors.	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall submit operations and maintenance plan to lead agency with required equestrian manure management measures incorporated. B. Lead agency to verify compliance through regular site visit/inspections (appropriate frequency to be determined by lead agency).	Lead agency
Biological Resources			
MM BIO-1: Desktop Review and Biological Surveys. Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. <u>The biological survey evaluation shall include an assessment of potential downstream impacts resulting from flow diversions, if such stormwater BMPs are considered as part of the Project design.</u> During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the	During plan development prior to construction and materials submitted	A. Conduct desktop review of specific project site. B. If desktop review indicates no potential special status biological resources or natural communities are likely to be present, prepare technical memorandum for file and mitigation is considered complete. C. If desktop review indicates potential for special status biological resources or natural communities, project proponent shall consult with appropriate regulatory agency (CDFW).	Lead agency, and as applicable, CDFW

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project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and ~~the project proponent shall~~ develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & Game Code, Seciton 2080 et seq.) The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.			
MM BIO-2: Pre-construction Nesting Bird Surveys. Conduct pre-construction nesting bird surveys and implement appropriate buffers. To avoid disturbance of nesting and special status birds,	During plan development prior	A. Project proponent shall contract with qualified biologist to conduct pre-construction nesting	Lead agency

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including species protected by the MBTA and California Fish and Game Code, activities related to the implementation of any project, including, but not limited to, ground disturbance, and vegetation trimming/removal, shall occur outside of the non-raptor bird breeding season (March 1 through August 31). If these activities must begin during the breeding season, then the project proponent shall conduct a pre-construction nesting bird survey no more than three days prior to initiation of ground disturbance activities. The nesting bird pre-construction survey shall be conducted on foot inside the project area, including a 300-foot buffer, and conducted in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in the Plan Area. If construction is scheduled to occur during the breeding season for raptors (January 15 to September 15), then no more than seven days before the start of the activities, a qualified biologist will conduct a pre-construction survey for nesting raptors in areas where suitable habitat is present within the project area and up to a 500-foot buffer, as determined by a qualified biologist. If active nests are found, an avoidance buffer (dependent upon the species, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with construction fencing, flagging, construction lathe, or other means. All project personnel working at a project site shall be notified of the buffer zone and all construction activities and project personnel will avoid entering the buffer zone until the avian biologist has confirmed that breeding/nesting is completed and the young have fledged the nest, or confirmed that the nest is no longer active. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.	to construction and materials submitted	bird surveys. B. If necessary, implement avoidance buffers. C. Qualified biologist to submit technical memorandum summarizing survey results and, if applicable, any buffers implemented	

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MM BIO-3: Conduct Burrowing Owl Pre-construction Surveys. Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with protocols currently accepted by CDFW. ~~with guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012).~~ If burrowing owl or their sign are observed, the project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & Game Code, Section 2080 et seq.). The project proponent shall have a fully executed take authorization prior to any activity that may result in take of CESA-protected species.	During plan development prior to construction and materials submitted	A. If desktop review indicates potential presence of burrowing owls, project proponent shall contract with qualified biologist to conduct burrowing owl protocol-level surveys. B. If necessary, implement avoidance buffers. C. Qualified biologist to submit technical memorandum summarizing survey results, and if applicable, any buffers implemented.	Lead agency
MM BIO-4: Conduct Pre-construction Special Status Bat Surveys. Pre-construction bat surveys will be conducted by a qualified bat biologist within ~~30~~ 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and/or acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are	During plan development prior to construction and materials submitted	A. If desktop review indicates potential presence of bats and bat roosts, project proponent shall contract with qualified biologist to conduct bat pre-construction surveys. B. If necessary, implement avoidance buffers. C. Qualified biologist to submit technical memorandum summarizing survey results, and if applicable, any buffers implemented.	Lead agency

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identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.			
MM BIO-5: Conduct Biological Monitoring. In area that may support special status biological resources or adjacent to special status plants, wildlife, and/or aquatic resources; Sensitive Natural Communities; or protected trees, a qualified biological monitor shall be required to monitor construction or maintenance activities while work is immediately adjacent to these area, or as deemed necessary by the qualified biologist to ensure that protection measures are in place to avoid incidental disturbance of habitat and special status species outside the Plan footprint. Biological monitoring shall include, but not be limited to, monitoring installation of protective barriers, monitoring of active bird nests, ensuring food waste and trash are enclosed in sealed containers and removed from the site, construction equipment remains within the project footprint and designated staging areas, and ensuring that staging and areas used to refuel are located in upland areas away from riparian habitat and aquatic sites. The qualified biological monitor shall have the authority to stop work to protect biological resources onsite, including special status species, riparian and aquatic resources, and protected trees. If any special status plant or wildlife species are found in a work area, the biological monitor shall have stop work authority to halt construction as necessary to prevent the death or injury to the species until the species leaves of its own accord or the proper consultation with USFWS and/or CDFW can be completed.	During construction	A. If desktop review indicates the potential presence of special status biological resources or protected trees, the project proponent shall retain a qualified biological monitor for construction or maintenance activities to ensure compliance with all established biological buffer areas. B. If necessary, biological monitor shall have stop work authority to halt construction.	Lead agency

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MM BIO-6: Implement a Worker Environmental Awareness Program. Prior to the start of construction (including staging and mobilization), all project personnel shall attend a Workers Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the Plan Area. The specifics of this program shall include identification of the special status biological resources and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the project area.	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall prepare a Worker Environmental Awareness Program that includes required details on conduct around biological resources and submit the Program to the lead agency for the project file. B. Project proponent shall ensure WEAP training is attended by all on-site personnel prior to entering the construction site and maintain records of training completion. Records to be available to lead agency upon request.	Lead agency
MM BIO-7: Implement Weed Abatement Measures. The project proponent shall implement weed abatement measures during construction and operations to minimize the spread and introduction of non-native plant material and/or tree diseases. Weed control shall be performed through a physical, cultural, biological, inorganic, or organic method. Chemicals that may be used include pre-emergent herbicides, post-emergent herbicides, and organic herbicides (all post-emergent, non-selective) as per the Countywide Integrated Pest Management (IPM) Program and one or more of the following measures as applicable: • Equipment and vehicles shall be cleaned of mud or other debris that may contain invasive plants and/or seeds to reduce the potential of spreading invasive weeds before mobilizing to the site and before leaving the site. Cleaning of equipment shall occur in a designated area away from sensitive natural communities and watercourses.	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall prepare a weed abatement plan per the Countywide Integrated Pest Management (IPM) Program for construction and operations and submit to the lead agency with submittal of construction site plans.	Lead agency

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• Trucks carrying loads of vegetation removed from the work area shall be covered and disposed of in accordance with applicable laws and regulations. • Only certified weed-free straw, mulch, and/or fiber rolls shall be used for erosion control. Fill material shall be obtained from weed-free sources. • Any trees identified for removal shall be inspected for contagious tree diseases. To avoid the spread of infectious tree diseases, diseased trees and plant material shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. • Following completion of construction, disturbed areas shall be returned to original grade (unless the design incorporated permanent grade changes), soils shall be decompacted, and areas shall be revegetated with native hydroseed and/or container plantings consistent with the SGV Greenway Network Plant Communities and Planting List as detailed in design plans or a project-specific restoration plan. All revegetated areas shall avoid the use of species listed in Cal-IPC's California Invasive Plant Inventory.			

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MM BIO-8: Construction Best Management Practices to Protect Wildlife. The project proponent shall ensure appropriate BMPs are implemented during construction which consist of the following, as applicable to the project: • Plastic monofilament netting (e.g., erosion control wattles or matting) or similar material shall be prohibited as part of erosion-control activities. Alternative allowable materials may include, but are not limited to, geotextiles, fiber rolls, geomembranes, hydroseeding compounds, loose-weave mesh, such as jute, hemp, and coconut fiber, and rice straw wattles (e.g., biodegradable, photodegradable, burlap). • Any excavated areas (holes, pits, or trenches) with steep sides more than 12 inches deep with sidewalls steeper than 45 degrees shall be covered with plywood or similar materials at the end of the day or have escape ramps put in place to keep wildlife from becoming trapped and/or allowing them to escape, with at least one ramp per 100 feet of trenching, and escape ramp slopes of no greater than 3:1. All construction pipe, culverts, or other structures with a diameter of 3 inches or greater that are stored overnight shall be screened or covered each night to prevent wildlife entrapment. • Incorporate appropriate buffer zones to avoid and minimize the effects of noise on special status wildlife and nesting birds in areas where special status biological resources has been identified. If a qualified biologists determines that buffer zones are not sufficient to avoid disturbance, other measures may be incorporated, such as delaying construction until nesting is completed (for nesting birds) or until special status species are no longer	During plan development prior to construction and materials submitted; During construction	A. Project proponent shall retain qualified biologist to implement construction best management practices to protect wildlife. B. Qualified biologist shall document all BMPs via weekly monitoring reports for the duration of construction activity. Monitoring reports to be made available to lead agency upon request.	Lead agency

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present or until a take permit for special status species is obtained. • The disturbance footprint for construction activity shall be minimized to the extent feasible. Trimming is defined as removal of vegetation to the extent necessary to allow a specific level of access (e.g., vehicles) for specific types of equipment (e.g., trucks, trailers, excavators). There shall be no vegetation removal beyond what is necessary to allow the level of access required for construction activities to occur.			
MM BIO-9: Operations Recreation Plan. The Operations Recreation Plan shall include requirements for the following measures, as applicable, to be implemented for by the project proponent in areas where recreational opportunities will be created: • Signage requiring pets to be on leash • Pet dropping/waste bag dispensers and disposal stations • Foot-wiping stations with signage explaining the purpose of the station (to prevent the spread of invasive weeds that degrade natural habitats that species depend on) • Wildlife-proof waste bins • Educational interpretive kiosks/signage (e.g., how to respect wildlife and habitats, stay on trail signs, identifying sensitive areas, pick up trash and fishing line, pick up after pets; opportunities to view wildlife) • Incorporation of signage to avoid ESAs around sensitive wildlife/habitat features • Prevention of fertilizer runoff	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall prepare operations recreation plan and submit to lead agency with construction site plans.	Lead agency

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• Management of unauthorized uses through coordination with local resources • Proper handling of any non-native plant species removed during operations and maintenance activities to prevent sprouting or regrowth; development of methods to ensure that non-native plant seeds are not spread during plant removal and that plants will be removed prior to flowering, if feasible. • *Trail design – where avoidance is not feasible, and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features.* • *Setbacks and restrictions – where avoidance is not feasible, and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, and could include restrictions on the size of gathering areas at pavilions, etc.*			
MM BIO-10: Prepare and Implement Pest Management Plan. The project proponent shall require that a pest management plan that adheres to the County's Integrated Pest Management (IPM) Program be prepared and implemented to prevent inadvertent poisoning of non-target wildlife during operations. The use of rodenticides as a pest-control measure shall be prohibited. Additionally, the use of neonicotinoid pesticides shall be prohibited as part of operations, which are known to be harmful to bumble bees.	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall prepare pest management plan that adheres to the County's IPM Program and submit to lead agency with construction site plans. Pest management plan to include MSDS for all proposed pesticides and herbicides. B. Lead agency to ensure that adherence to pest management is a requirement of any contracts	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
		with pest management contractors during operation.	
MM BIO-11: Use Bird Safe Glass. The project proponent shall require that any glass used in the design of facilities is safe for birds. Bird safe glass is designed so that it is a visible obstacle to birds to avoid bird strikes with buildings, while still being transparent to people.	During plan development prior to construction and materials submitted; During construction	A. Project proponent shall ensure construction site plans submitted to lead agency specify the use of bird safe glass.	Lead agency
MM BIO-12: Desktop Review and Conduct a Jurisdictional Delineation. A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures.	During plan development prior to construction and materials submitted; Prior to construction	A. Conduct desktop review of National Wetland Inventory. B. If necessary, project proponent shall retain qualified biologist to conduct jurisdictional delineation. C. Results of jurisdictional delineation to be defined on construction site plans to demonstrate avoidance. D. Lead agency to conduct inspection to verify flagging/fencing and avoidance measures.	Lead agency
MM BIO-13: Permanent Wetlands Signage. Any wetlands identified within or adjacent to the construction footprint, but not affected by construction activities, shall be clearly marked with permanent signage and fencing to restrict trespassing by the public and operations and maintenance staff.	During construction; Ongoing	A. Install permanent wetlands signage within or adjacent by construction activities, but not affected, shall be clearly marked with signage. B. Lead agency to conduct inspection or require submittal of technical memorandum with	Lead agency

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		photographs to verify installation of signage and fencing.	
Cultural Resources			
MM CR-1: Historical Resources Assessment. Historical resources shall be evaluated for their eligibility for listing in the CRHR or local register prior to project development. The records search will help identify any recorded sites/resources that may be impacted by a project. A historian or architectural historian, per the Secretary of Interior's Professional Qualification Standards for Architectural History, shall perform a records search and site investigation to identify potentially eligible historical sites/resources within a quarter-mile of a project site. The principal records search shall be conducted using the California Historical Resources Information System (CHRIS). The South Central Coastal Information Center at California State University Fullerton administers the historical records for Los Angeles County and is the preferred location to conduct the historical records search. To supplement the CHRIS records search, at a minimum, the following sources shall be searched: • NRHP National Park Service online website • Office of Historic Preservation • California Historical Landmarks • California Points of Historical Interest • Local historical societies	During plan development prior to construction and materials submitted	A. Project proponent shall retain qualified cultural resources professional to conduct historical resources assessment and site investigation of individual projects site. B. A technical memorandum or report shall be submitted with construction site plans to the lead agency to either verify that no resources are present or if additional mitigation measures are necessary.	Lead agency

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• Local registers and general plans Sanborn maps (available at the Los Angeles Public Library) • Historic U.S. Geological Survey (USGS) quadrangles • Historic aerial maps • If no designated eligible or historic resources are identified during this assessment, no further mitigation shall be required.			
MM CR-2: Avoid Historical Resources. If eligible or designated historical resources, as defined by CEQA, are identified, demolition or substantial alteration of such resources shall be avoided. This may require redesign of the proposed action/project to provide adequate buffer as to not significantly alter the historical resource.	During plan development prior to construction and materials submitted	A. If historic resources are identified during MM CR-1, project proponent shall submit construction site plans to lead agency that clearly indicate avoidance of impacts to resource.	Lead agency
MM CR-3: Prepare and Implement a Historic Resources Mitigation Plan. If avoidance is determined to be infeasible, the project proponent shall prepare a treatment plan to include, but not be limited to, photo-documentation and public interpretation of the resource. The plan shall be submitted to the local jurisdiction in which the project is proposed as part of the Plan Review process	During plan development prior to construction and materials submitted	A. If avoidance of impacts to historic resource identified in MM CR-1 is not feasible, project proponent shall retain qualified cultural resources professional to prepare a historic resources mitigation plan.	Lead agency

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for review and approval prior to implementation. Required plan elements include the following: • Survey or photographic documentation of the historical resource before construction begins as a baseline condition for assessing damage. • Preparation of protocols for the documentation of inadvertent damage, should it occur, as well as notification to the appropriate owner and/or jurisdiction. • Strategy for repair of historical resource in accordance with the Secretary of the Interior Standards.		B. Plan shall be submitted to the local jurisdiction in which the project is proposed as part of the Plan Review.	
MM CR-4: Cultural Resources Assessment. Construction activities that result in ground disturbance have the potential to impact buried archaeological resources. A qualified archaeologist shall conduct an archaeological inventory and assessment per the Secretary of the Interior's Professional Qualifications Standards for Archaeology, for any project that would result in ground disturbance. The assessment shall include a records search of CHRIS, at the South Central Coastal Information Center at California State University Fullerton which administers the historical records for Los Angeles County. If a location has been previously surveyed and no cultural resources have been recorded on it, no further cultural resources studies shall be required. If a location has not been previously surveyed based on the records search information, an intensive (100 percent) pedestrian ground surface survey (Phase I survey/Class III inventory) by qualified archaeologists shall be required. All archaeological/cultural resources identified during the site survey will be recorded, pursuant to applicable local/municipal guidance. Any newly encountered archaeological resources shall be evaluated by a qualified archaeologist for their eligibility for listing in the CRHR or NHRP and for significance as a historical resource or unique archaeological resource per State CEQA Guidelines Section 15064.5.	During plan development prior to construction and materials submitted	A. Project proponent shall retain a qualified cultural resources professional to conduct archaeological inventory and assessment, including NAHC and CHRIS searches. B. If never surveyed, an intensive pedestrian ground surface survey shall be required. B. If findings are significant, recommendations shall be made in consultation with implementing agency.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency. If, following the records search, literature review, and field survey, it is determined that there are no archaeological present in the project area, then no further action would be required.			
MM CR-5: Avoid Cultural Resources, Prepare Treatment Plan. If a significant resource is present, the preferred treatment is to avoid the site/resource to preserve it in place, pursuant to State CEQA Guidelines Section 15126.4(b)(3). This may require redesign of the proposed project. In accordance with State CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, a qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the project proponent. For sites with archaeological resources that cannot be avoided, the project proponent shall prepare an Archaeological Evaluation and Treatment Plan, in coordination with the qualified archaeologist, that describes methods and procedures for conducting subsurface excavations to determine the vertical and horizontal extents of an archaeological site. The draft plan shall be provided for review to any tribes that expressed interest in prehistoric or tribal resources. Implementation of such a plan may include mechanical and/or manual excavations to provide data on the cultural constituents at the site and the depositional context of such materials (if found to exist). This data can be used to determine the integrity of the site and make a formal evaluation based on the eligibility criteria set forth in CEQA and Section 106 of the NHPA for inclusion in the CRHR and NRHP. The Archaeological Evaluation and Treatment	During plan development prior to construction and materials submitted	A. If resources are identified under MM CR-4, construction site plans shall be revised to avoid cultural resources, if feasible B. If avoidance is feasible, project proponent shall retain qualified cultural resources professional to develop an archaeological evaluation and treatment plan to be submitted with construction site plans to the lead agency. If necessary, develop additional treatment measures.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
measures should define the parameters of archaeological testing at the site and the extent of excavation and analysis of any materials recovered. The Archaeological Evaluation and Treatment measures must also include guidelines for treatment and curation of any materials recovered during the testing process. Subsequent to implementation of the Archaeological Evaluation and Treatment measures, a technical report describing the methods and results of archaeological testing and formal evaluations of the archaeological sites and recommendations for further treatment will be complete.			
MM CR-6: Monitoring. A Secretary of the Interior-qualified archaeologist or archaeological monitor working under the direction of a Secretary of the Interior-qualified archaeologist shall be retained by the implementing agency. The archaeologist or archaeological monitor, either meeting or working under the direction of an archaeologist who meets the Secretary of the Interior Professional Qualification Standards in archaeology, shall monitor ground disturbing activities in areas with potential for archaeological resources**.**	During construction	A. Project proponent shall retain a qualified archeologist monitor for ground-disturbing activity. B. Daily monitoring reports to be provided to lead agency upon request.	Lead agency
MM CR-7: Unanticipated Discovery of a Cultural Resource. If a cultural resource is discovered inadvertently during construction, all work in the immediate vicinity of the find (within a 60-foot buffer) shall stop until a SOI-qualified archaeologist can evaluate the significance of the find. Work on other portions of the project outside the buffered area may continue during this assessment period. If the find is determined to be significant, the project proponent shall prepare a treatment plan in accordance with MM CR-5 described above**.**	During construction	A. All work shall cease within 60 feet of the find. B. Project proponent shall retain qualified archaeologist to prepare and submit an unanticipated discovery plan to the lead agency. An unanticipated discovery plan shall be prepared and submitted. C. A qualified archaeologist shall evaluate any unanticipated site for significance and recommend appropriate treatment measures. D. The qualified archaeologist shall outline the	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
		recommendations for data recovery and curation in a report for submittal and review for the file. E. The qualified archaeologist shall determine if or when ground disturbing activities within 50 feet of the find can or cannot resume.	
MM CR-8: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. If human remains and/or grave goods are discovered or recognized during project construction, the implementing agency shall immediately halt all work in the immediate vicinity (within a 100-foot buffer of the find), contact the Los Angeles County Coroner to evaluate the remains, and follow the procedures and protocols set forth in State CEQA Guidelines Section 15064.5(e). If the County Coroner determines that the remains are Native American, the implementing agency shall contact the NAHC, in accordance with Health and Safety Code Section 7050.5(c) and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant for the remains per PRC Section 5097.98. Per PRC Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains and any associated grave goods are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the Most Likely Descendant regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The Most Likely Descendant shall make recommendations to the District within 48 hours for the treatment or disposition, with property dignity, of the human remains and/or grave goods, which shall be implemented in accordance with PRC Section 5097.98 and Section 15064.5(e) of the	During construction	A. All specific provisions of the mitigation and State law shall be implemented. B. A technical memorandum documenting the finding and measures taken shall be prepared and submitted to the lead agency.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
State CEQA Guidelines. If the Most Likely Descendant fails to make recommendations within 48 hours, the County may reinter the remains in an area of the property not subject to further disturbance. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the CHSC (Section7100 et seq.) directing identification of the next-of-kin will apply. The NAHC is authorized to resolve any disputes regarding the disposition of such remains, pursuant to Section 15064.5(e) of the State CEQA Guidelines. Work may resume at the implementing agency's discretion but will commence only after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.			
Geology and Soils			
MM GEO-1: Pre-Construction Paleontological Resources Investigation. During design of individual proposed projects with excavation in the Hacienda Heights or the Diamond Bar areas of Puente Hills, and prior to construction, the project proponent shall contract with a qualified paleontologist or registered geologist to conduct paleontological resource investigation consistent with Society of Vertebrate Paleontology Guidelines. If sensitive deposits are identified and could be affected by the proposed project in the Plan Area, MM GEO-3 shall be implemented.	During plan development prior to construction and materials submitted	A. If necessary, project proponent shall retain a qualified paleontologist or registered geologist. B. Conduct paleontological resource investigation. C. Results of investigation shall be documented in a technical memorandum submitted to the lead agency.	Lead agency
MM GEO-2: Avoid or Monitor Paleontological Resources. If sensitive deposits are identified in excavations in the Hacienda Heights or the Diamond Bar areas of Puente Hills and could be affected by the proposed project, the implementing agency will redesign the subsequent project to avoid sensitive paleontological resources and deposits that could potentially contain these resources. If avoidance and/or project redesign is not feasible, then	During plan development prior to construction and materials submitted	A. If sensitive deposits are identified, retain a Qualified Paleontologist prior to excavation work. B. Qualified paleontologist shall follow all measures as described in the mitigation measure.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
paleontological monitoring will be implemented. If sensitive deposits are identified and avoidance and/or project redesign is not feasible, prior to ground-disturbing activities, the project proponent shall retain a qualified paleontologist to be available "on-call" during excavation and ground-disturbing activities that occur in undisturbed deposits below ground surface, the extent of which will be determined based on review of the geotechnical report/paleontological resource investigation, and to inspect exposures for contained fossils. In the event that paleontological resources are discovered, work will be halted, the lead implementing agency will be notified immediately, and the implementing agency will consult with the qualified paleontologist to assess the significance of the find according to Section 15064.5 of the CEQA Guidelines. If any find is determined to be significant, the implementing agency and the paleontologist will determine appropriate avoidance measures or other appropriate mitigation. The implementing agency will make the final determination. All significant paleontological materials recovered will be reviewed, evaluated, and documented according to current professional standards by the consulting paleontologist and discussed with the implementing agency. The implementing agency will make the final determination. Based on observations, monitoring may be reduced or discontinued if the qualified paleontologist determines that the possibility of encountering fossiliferous deposits is low.			
MM GEO-3: Avoid/Minimize Impacts on Paleontological Resources During Operations. If significant paleontological resources and sensitive deposits with the potential to contain significant paleontological resources are identified within a proposed project area with excavation in the Hacienda Heights or the Diamond Bar areas of Puente Hills in the Plan Area during design/planning of individual projects (MM GEO-1: Pre-Construction Paleontological Resources Investigation and MM GEO-2: Avoid or Monitor Paleontological), and sensitive deposits	During plan development prior to construction and materials submitted; Ongoing	A. If necessary, project proponent shall prepare an operations and minimization plan to avoid/minimize impacts during operations. Plan shall be submitted to lead agency.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
remain exposed at or near the ground surface, the project proponent in coordination with the qualified paleontologist shall prepare an avoidance and minimization plan to avoid and/or minimize potential impacts during operations. This plan may include, but not be limited to: • Preparing an operations and maintenance plan to minimize degradation and exposure of sensitive deposits • Designing and developing interpretive exhibits to provide education and understanding of the importance of avoiding and protecting sensitive deposits and paleontological resources • Create Environmentally Sensitive Areas around the paleontological resources. Generally, the Environmentally Sensitive Area would be secured using some combination of exclusionary fencing or monitoring as an alternative to excavation/removal.			
Greenhouse Gases			

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies. Project proponents shall implement the following GHG emissions reduction strategies: – Energy • Use renewable energy sources (e.g., solar) as feasible. • Optimize building orientation for solar exposure, diffused daylight, and passive ventilation as feasible. – Area • Electric Landscaping Equipment. Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) shall employ electric landscaping equipment. – Water Use • Implement County of Los Angeles Low Impact Development Standards Manual or local LID ordinances. – Waste • Waste Reductions. New construction shall implement one or more of the following measures related to minimization and recycling of waste generation. • Provide recycling receptacles that are clearly identified and labeled. • Use locally sourced, recycled, and recyclable materials with low-embodied energy. • Use green cleaning products and integrated building management. • Regularly monitor building systems and optimize usage.	During plan development prior to construction and materials submitted; Ongoing	A. Construction site plans submitted to lead agency shall specify all GHG emissions reduction strategies to be implemented.	Lead agency
Hazards and Hazardous Materials			

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
MM HAZ-1: Pre-construction hazardous site records search. Prior to ground disturbance at each proposed project site, a database search pursuant to California Government Code Section 65962.5 shall be conducted to identify if the project site is located on or near a hazardous materials site and to determine the applicability of any regulatory requirements or hazardous material risks associated with the construction site or the adjacent sites. If the site is not located on or adjacent to a hazardous materials site or is determined not to present a risk to the public or environment, no further action would be necessary. If the site is located on or near a hazardous site and is determined to present a potential risk, then additional engineering controls may be necessary, including MM HAZ-2: Phase I/II Environmental Site Assessment and MM HAZ-3: Soil and Groundwater Management Plan as appropriate.	During plan development prior to construction and materials submitted	A. Project proponent shall conduct database search prior to ground disturbance and document results in a technical memorandum submitted to the lead agency. B. If site is located on or near a hazardous site and is determined to present a potential risk, implement additional engineering controls. Engineering controls shall be specified on construction site plan.	Lead agency
MM HAZ-2: Phase I/II Environmental Site Assessment. Prior to ground disturbance, a Phase I Environmental Site Assessment shall be conducted in conformance with industry-accepted practices, American Society of Testing Materials (ASTM) Designation E1527-05, and the USEPA All Appropriate Inquiry Rule (40 CFR Section 312). Based on the Phase I Environmental Site Assessment findings, recommendations for further assessment (i.e., Phase II Environmental Site Assessment) or mitigation measures shall be recommended, as appropriate,	During plan development prior to construction and materials submitted	A. If necessary, based on results of MM HAZ-1, project proponent shall retain a qualified environmental professional to conduct Phase I Environmental Site Assessment (and as necessary a Phase II Environmental Site Assessment) prior to ground disturbance. B. Report shall be submitted to lead agency for inclusion in project files.	Lead agency
MM HAZ-3: Soil and Groundwater Management Plan. Should the assessments required under MM HAZ-2 above reveal chemicals of concern above applicable clean-up goals, or should unanticipated contamination be found during site excavation, a Soil and Groundwater Management Plan shall be prepared. The Soil and Groundwater Management Plan shall be implemented prior to,	During plan development prior to construction and materials submitted; During construction	A. If necessary, based on the results of MM HAZ-2, the project proponent shall prepare and submit a Soil and Groundwater Management Plan to the lead agency for review and approval.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
during, and after excavation and grading activities on the Project Site to ensure that any contaminated soils are properly identified (type and extent), excavated, and disposed of off-site. The sampling program shall include the following: • Health and safety plan that specifies pre-field activities (e.g., marking of boring locations, obtaining utility clearance) and field activities (e.g., sampling procedures, health and safety measures, soil stockpile management, etc.) • Necessary permits for well installation and/or boring advancement • A soil sampling and analysis plan, including chemical testing methods, and quality assurance/quality control procedures. Laboratory analyses to be conducted by a State-certified laboratory • Hazardous material handling and disposal processes, including appropriate certified hazardous material hauling (transport) and disposal/recycling facilities		B. Project proponent shall implement the approved plan during construction activities. All records of soil sampling and analysis to be made available to lead agency upon request. C. Removal of contaminated soils or UST in accordance with approved Soil and Groundwater Management Plan.	
Mineral Resources			
MM MR-1. Ensure Access to Mineral Resources. The project proponent shall ensure that final project design does not restrict access to known mineral resource sites.	During plan development prior to construction and materials submitted	A. If applicable, project proponent shall identify any known mineral resource sites on construction site plan and delineate within design how access will be maintained during construction and operation of project.	Lead agency
Noise and Vibration			

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan. For projects within 200 feet of a sensitive receptor, or where the estimated construction noise levels identified in Table 3.13-10 propagated to the nearest receptor (i.e., assuming an attenuation rate of 6 dB per double of distance) would exceed the noise ordinance of the respective jurisdiction, the project proponent shall prepare a focused noise and vibration study which identifies nearby noise and vibration sensitive receptors that could be affected, predicts anticipated construction-related noise and vibration levels, and identifies measures that shall be implemented by the construction contractor in order to comply with the standards of the applicable jurisdiction. Such noise and vibration reduction measures that could be implemented include, but are not limited to, the following: – Noise Reduction Measures • Reduce intensity of construction activity, including limiting the number of equipment operating simultaneously; • Locating construction equipment far enough from noise-sensitive land uses such that noise attenuates to below the applicable noise standard. In particular, all stationary noise-generating construction equipment, such as pumps and generators, shall be located as far as possible from nearby noise-sensitive receptors. Noise-generating equipment shall be shielded from nearby noise sensitive receptors by noise-attenuating buffers, such as structures or haul truck trailers. Water tanks and equipment storage, staging, and warm-up areas shall be located as far from noise sensitive receptors as possible; and/or • Designing and installing temporary sound barriers, which would provide attenuation below the applicable noise standard. – Vibration Reduction Measures • Using less vibration-intensive construction equipment;	During plan development prior to construction and materials submitted; During construction	A. Project proponent shall retain acoustical consultant to verify noise levels are below the applicable thresholds and develop and implement a Noise Reduction Plan as necessary. Technical report and noise reduction plan shall be submitted to lead agency prior to the issuance of any permit.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
• Timing construction so that structures would not be occupied when high levels of vibration are expected; and/or • Informing residents of the timing of construction and that vibration may be noticeable during these times.			
MM NOI-2: Prepare Focused Noise Study and Noise Reduction Measures. During final design, the project proponent shall prepare a focused noise study to determine the existing ambient baseline noise level by which to compare the operational noise level of the project. The focused noise study shall analyze the existing baseline noise level against operational noise, and, if it is determined that operational noise levels from the project exceed the sound level limit, the project proponent shall provide measures or engineering best management practices to reduce exterior noise below the limit. If the results of study indicate no exceedance than no further measures necessary. Measures or best management practices could include, but are not limited to, the following: • Locating the project away from noise-sensitive receptors to reduce operational noise to below the existing baseline; • Designing the project to shield noise-sensitive receptors from noise-producing elements; and/or • Inclusion of noise-attenuating features such as soundwalls, berms, acoustical shielding, etc., which would block the line of sight and provide noise reduction to surrounding noise-sensitive land uses.	During plan development prior to construction and materials submitted; Ongoing	A. Noise study to be submitted to lead agency for review and approval. B. Construction site plans shall clearly indicate all noise attenuating features. C. Lead agency to conduct site inspection and/or require submittal of technical report with photographs to verify that all noise reduction features are installed.	Lead agency
Recreation			
MM REC-1: Coordinate with Parks Departments/Agencies. Project proponents shall notify park agencies in advance of the nature, extent, and duration of construction activities that may affect parks, trails and other recreational facilities in order to minimize disruptions of recreational uses during construction activity and	During plan development prior to construction and materials submitted; Prior to construction	A. If applicable, project proponent shall provide notice to park agencies on construction activity that may affect recreational facilities at least 30 days prior to	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
ensure adequate planning with regard to any needs for temporary increased levels of maintenance activity.		construction activity. B. Lead agency shall be copied on all notices and maintain copies in project file.	
Transportation and Traffic			
MM TR-1: Construction Transportation Management Plan. The project proponent shall prepare and implement a Construction Transportation Management Plan that will include provisions for the following: • Implementation of standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, and use of traffic control devices. • Use of flaggers and/or signage to guide vehicles through or around construction zones using proper techniques for constructing activities including staging area entrance and exit. • Alternate traffic routes and the use of construction personnel carpools or shuttles to avoid roads that are operating at a Level of Service D or lower. • Traffic detours for any road or land closures with appropriate signage marking the detours. • Timing of lane and road closures. • Plans for construction worker parking and transportation to work sites. • Methods for keeping roadways clean. • Storage of all equipment and materials in designated work areas in a manner that minimizes traffic obstructions and maximizes sign visibility.	During plan development prior to construction and materials submitted; During construction	A. Project proponent shall prepare Construction Transportation Management Plan and submit with the construction site plans to the lead agency.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
• Routing of trucks to avoid minor roads, where possible, to reduce congestion and potential asphalt damage. • Repair asphalt and other road damage (e.g., curb and gutter damage, rutting in unpaved roads) caused by construction vehicles. • Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed. • Maintain emergency ingress and egress to access roads at all times.			
MM TR-2: Restrict Lane Closures and Maintain Access. The project proponent shall restrict all necessary lane closures or obstructions associated with construction activities to off-peak periods to reduce traffic delays. <u>Project work within or abutting a Caltrans right of way shall not occur unless authorized by an encroachment permit</u>. Lane closures shall not occur between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., unless otherwise authorized by the responsible public agency with jurisdiction over the affected street or highway through the issuance of an encroachment permit. The project proponent or its construction contractors shall coordinate with schools prior to construction within 1,000 feet of school property to ensure entryways to schools are not blocked during peak drop-off and pick-up hours. Underground work areas within intersections or traffic lanes shall be adequately covered with steel plating prior to 3:30 p.m. to allow uninterrupted traffic flow during peak traffic periods. All residents within 300 feet of a proposed temporary lane or road closure shall be notified within at least 7 days prior to a temporary lane or road closure. The project proponent or its construction contractors shall maintain travel through intersections at all times during construction. The project proponent or its construction contractors shall provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure driveway access to schools, businesses, and	During construction	A. Measures to restrict lane closures shall be included in the Construction Transportation Management Plan in MM TR-1. B. Proof of distribution of notices to residents to be provide to lead agency for project file.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
residences and shall provide continuous access to properties when not actively performing construction activities. In the event of a nearby fire or other emergency, steel plating shall be placed over underground work areas and construction equipment shall be removed from the partially or fully closed roadways, as needed, to permit uninterrupted traffic flow.			
MM TR-3: Closure Notification and Detours. Where construction results in temporary closures of sidewalks and other pedestrian facilities, the project proponent shall provide temporary pedestrian access, through detours or safe areas along the construction zone. Where construction activity results in bike route or bike path closures, appropriate detours shall be defined. Signs shall be placed along the closed bike path a minimum of 7 days prior to bike path closure notifying bicyclists of the proposed construction activities and duration of bike path closure. Notifications posted along the bike path shall include the location of detours and alternate routes to avoid conflicts with the construction area.	During plan development prior to construction and materials submitted; During construction	A. If necessary, project proponent shall provide temporary pedestrian access through detours or safe areas along the construction zone. B. Project proponent shall provide technical memorandum with photographs of signage to lead agency for project files.	Lead agency
MM TR-4: Notify Emergency Personnel of Road Closures. The project proponent shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services) at least 7 days prior to lane or road closures. The notice shall include location(s), date(s), time(s), and duration of closure(s), and a contact number for project personnel.	During plan development prior to construction and materials submitted; Prior to construction During construction	A. Notify all local emergency personnel at least 7 days prior to lane or road closures. B. Copies of all notifications to be provided to lead agency for project files.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency

MM-TR-5: Determine VMT Based on Type of Subsequent Project. For any proposed projects that include parks and greenspaces, the project proponent shall conduct the following two-step screening process:
• Step 1: Conduct a trip generation analysis to determine whether a project would generate a net increase of 110 or more daily trips, or determine whether the location is located within one-half mile of a major transit stop or high-quality transit corridor based on its County Transportation Impact Analysis Guidelines Sections 3.1.2.1 and 3.1.2.3. If the project is screened out once project design and location details are known, then no further actions are required. If the subsequent project is not screened out after Step 1, the implementing agency will move on to Step 2.
• Step 2: Perform a VMT analysis for the subsequent project using the County's VMT impact criteria that have been developed based on guidance from OPR and CARB. Per the criteria, project VMT impact thresholds vary depending on the project type, as follows:
  ○ For residential development land use projects, the project's residential VMT per capita would not be 16.8 percent below the existing residential VMT per capita for the Baseline Area in which the project is located.
  ○ For office land use projects, the project would generate employment VMT per employee exceeding 16.8 percent below the existing employment VMT per employee for the Baseline Area in which the project is located.
  ○ For regional serving retail land use projects, entertainment projects, and/or event center
	During plan development prior to construction and materials submitted	A. Project proponent shall provide trip generation analysis and VMT calculations to lead agency with construction site plans.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
land uses, the project would result in a net increase in existing Total VMT. Trips associated with these land uses are typically discretionary trips, which may be either substitute trips to other, closer destinations, or new trips entirely. A project-specific customized approach will be required to estimate VMT for such projects. The methodology should be developed in consultation with and approved by Public Works staff at the outset of the study. ○ For unique land uses in which a land use project does not fit into any of the above categories, a project-specific customized approach may be required to estimate daily trips and VMT, but may be based on the existing employment trip element using an approach similar to that for office projects, above. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by LA County Public Works staff at the outset of the study. • If the subsequent project cannot be screened out but the VMT is determined to not exceed the threshold based on the applicable guideline and project type, then no further action is needed. If the subsequent project cannot be screened out and the VMT is determined to exceed the threshold based on the applicable guideline and project type, then MM TR-6 shall be implemented.			
MM-TR-6: Implement Transportation Demand Management Strategies and/or Enhancements to Reduce VMT. The project proponent shall implement a subsequent project-specific program utilizing transportation demand management (TDM) strategies and	During plan development prior to construction and materials submitted	A. If analyses conducted under MM TR-5 exceed thresholds, project proponent shall incorporated transportation	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
neighborhood or site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT associated with the project. The program to reduce VMT shall be based on the suite of eligible TDM strategies included in the County Guidelines or other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program shall be based on that city's list of qualifying VMT mitigation strategies. Specific measures can include but are not limited to: • Increasing transit accessibility • Relocating a project in order to be adjacent to transit • Pricing any provided parking at river access sites to discourage vehicle trips to the project site • Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act ([ADA)]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes.		demand strategies as part of project design. B. Technical memorandum documenting strategies shall be submitted to the lead agency for review and approval. C. Proof of implementation to be submitted to lead agency for project files. If necessary, implement VMT reduction strategies.	
Tribal Cultural Resources			
MM TCR-1: Tribal Cultural Resources Assessment. Construction activities that result in ground disturbance have the potential to impact buried tribal cultural resources. A qualified archaeologist shall conduct an archaeological inventory and assessment per the Secretary of the Interior's Professional Qualifications Standards for Archaeology, for any project that would result in ground disturbance. The assessment shall include a records search of the Sacred Land File Search at Native American Heritage Commission (NAHC) and CHRIS, at the South Central Coastal Information Center at California State University Fullerton which administers the historical records for Los Angeles County.	During plan development prior to construction and materials submitted	A. Project proponent shall retain a qualified cultural resource professional to conduct archaeological inventory and assessment, including NAHC and CHRIS searches. B. If never surveyed, an intensive pedestrian ground surface survey shall be required. B. If findings are significant, recommendations shall be made	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
If a location has been previously surveyed and no tribal cultural resources have been recorded on it, no further tribal cultural resources studies shall be required. If a location has not been previously surveyed based on the records search information, an intensive (100 percent) pedestrian ground surface survey (Phase I survey/Class III inventory) by qualified archaeologists shall be required. All tribal cultural resources identified during the site survey will be recorded, pursuant to CDPR and applicable local/municipal guidance. Any newly encountered tribal cultural resources shall be evaluated by a qualified archaeologist for their eligibility for listing in the CRHR or NHRP and for significance as a historical resource or unique archaeological resource per State CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American tribes. If, following the records search, literature review, sacred land file search, and field survey, it is determined that there are no tribal cultural resources present in the project area, then no further action would be required.		in consultation with implementing agency and appropriate Native American Tribes.	
MM TCR-2: Avoid Cultural and Tribal Cultural Resources, Prepare Treatment Plan. If a significant resource is present, the preferred treatment is to avoid the site/resource to preserve it in place, pursuant to State CEQA Guidelines Section 15126.4(b)(3). This may require redesign of the proposed project. In accordance with State CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, a qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the project proponent, and any local Native American representatives expressing interest in prehistoric or tribal resources. For sites with archaeological resources that cannot be	During plan development prior to construction and materials submitted	A. If resources are identified under MM TCR-1, construction site plans shall be revised to avoid Tribal resources, if feasible B. If avoidance is feasible, project proponent shall retain qualified cultural resources professional to develop an archaeological evaluation and treatment plan to be submitted with construction site plans to the lead agency and appropriate Native American	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
avoided, the project proponent shall prepare an Archaeological Evaluation and Treatment Plan, in coordination with the qualified archaeologist, that describes methods and procedures for conducting subsurface excavations to determine the vertical and horizontal extents of an archaeological site. The draft plan shall be provided for review to any tribes that expressed interest in prehistoric or tribal resources. Implementation of such a plan may include mechanical and/or manual excavations to provide data on the cultural constituents at the site and the depositional context of such materials (if found to exist). This data can be used to determine the integrity of the site and make a formal evaluation based on the eligibility criteria set forth in CEQA and Section 106 of the NHPA for inclusion in the CRHR and NRHP. The Archaeological Evaluation and Treatment measures should define the parameters of archaeological testing at the site and the extent of excavation and analysis of any materials recovered. The Archaeological Evaluation and Treatment measures must also include guidelines for treatment and curation of any materials recovered during the testing process. Subsequent to implementation of the Archaeological Evaluation and Treatment measures, a technical report describing the methods and results of archaeological testing and formal evaluations of the archaeological sites and recommendations for further treatment will be completed		Tribes. If necessary, develop additional treatment measures.	
MM TCR-3: Unanticipated Discovery. If a tribal cultural resource is discovered inadvertently during construction, all work in the immediate vicinity of the find (within a 60-foot buffer) shall stop until a SOI-qualified archaeologist can evaluate the significance of the find. Work on other portions of the project outside the buffered area may continue during this assessment period. Additionally, local Native American tribes who have expressed interest and concern regarding the proposed project shall be contacted, regarding any pre-contact and/or historic-era finds and be provided information after the	During construction	A. All work shall cease within 60 feet of the find. B. Project proponent shall retain qualified archaeologist to prepare and submit an unanticipated discovery plan to the lead agency. An unanticipated discovery plan shall be prepared and submitted. C. A qualified archaeologist shall evaluate any unanticipated site	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. If the find is determined to be significant, the project proponent shall prepare a treatment plan in accordance with MM TCR-2 described above.		for significance and recommend appropriate treatment measures. D. The qualified archaeologist shall outline the recommendations for data recovery and curation in a report for submittal and review for the file. By the lead agency and appropriate Native American Tribes E. The qualified archaeologist shall determine if or when ground disturbing activities within 50 feet of the find can or cannot resume.	
Mitigation Measure TCR-4: Conduct Native American Monitoring. Native American monitoring will be conducted by the tribe that identified the TCR through AB 52 consultation and have requested monitoring and Tribes that have been identified through TCR-1. Native American monitors will work with a project's qualified archaeologist during ground disturbing activities in native sediments and will observe all ground-disturbing activities within a distance agreed upon by the tribal monitor and the archaeologist from the TCR. Should unanticipated discoveries be made during Native American monitoring, then the unanticipated discoveries protocol described in MM TCR-3 will be enacted. This includes halting ground-disturbing activities for a reasonable period of time, consulting with the lead agency and Native American representatives (if the find is Native American in origin), developing a mitigation plan, and potentially developing and implementing a data recovery plan. In the event of an unanticipated discovery of human remains, the monitor will follow Section 7050.5 of the Health and Safety Code.	During construction	A. Project proponent shall retain a qualified archeologist monitor and Native American monitors for ground-disturbing activity. B. Daily monitoring reports to be provided to lead agency upon request.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
Utilities			
MM UTL-1: Prepare and Implement Utilities Plan. Utilities searches are required for all projects occurring on District ROW. For those projects proposed for adjacent parcels, project proponents conduct utilities search to identify the location of existing utilities in the project area and determine if construction activity would impact existing utility lines. If results show no impact, project shall proceed. If potential impact is identified or if new/expanded infrastructure is required for project implementation, the proponent shall prepare a utilities plan during design that: • Identifies the location of existing utilities and connections and new/expanded infrastructure that will be required to connect to existing services • Quantifies demand and generation factors for construction of the new/expanded infrastructure on a project-specific basis and determine whether supply/capacity can meet demand • Identifies project modifications that will minimize any significant environmental impact on utilities • As part of the utilities plan, the project proponent will prepare a utilities report that compares the expected operational demand and generation for the various utility resources against existing supply and infrastructure to determine whether sufficient capacity exists to accommodate the project; if any insufficiency is identified, the project proponent will modify the project to avoid the impact in consultation with the affected utility provider(s) and in compliance with site-specific conservation features above those required by the applicable codes and ordinances.	During plan development prior to construction and materials submitted	A. Project proponent shall conduct underground utilities search. B. If necessary, project proponent shall prepare a utilities plan and submit to lead agency with construction site plans. C. If applicable, project proponent shall coordinate with other utility operators in the same public rights-of-way impacted by Project construction. Proof of coordination (tech memo's, emails, etc.) shall be provided to lead agency for project files.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
MM UTIL-2: Evaluate Downstream Beneficial Uses. Prior to selection of a stormwater BMP, project proponents shall evaluate the potential for impacts to downstream beneficial uses, including surface water rights, and shall not select BMPs that result in preventing access to previously appropriated surface water downstream.	During plan development prior to construction and materials submitted	A. Project proponent shall conduct a desktop review of designed beneficial uses and surface water rights downstream of proposed project location. B. Based on results of analysis, Project proponent shall select an appropriate stormwater BMP that does not prevent access to appropriated surface water, if applicable. Proof of analysis (e.g., tech memo, emails) shall be included in the lead agency project files	Lead agency
Wildfire			
MM WF-1 Construction Coordination with Emergency and Fire Services. Project proponents shall notify and coordinate with Los Angeles County and/or local jurisdictions' emergency department(s) on project information (e.g., project design, construction activities, and scheduling), including fire station(s) and/or police station(s) servicing the project area. This mitigation measure is designed to ensure that the emergency service providers serving an individual project area are engaged and that project proponents utilize these local experts to identify and document alternative fire and emergency medical response routes where needed. If determined to be necessary by the relevant police and/or fire service providers, one or more of the following applicable traffic control measures capable of reducing the temporary adverse effects on police and emergency vehicle travel during project construction shall be implemented:	During plan development prior to construction and materials submitted	A. Project proponents shall notify Los Angeles County and/or local jurisdictions emergency departments on project information in writing. B. If necessary, project proponent shall implement applicable traffic control measures.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
• Use of flag persons to direct traffic. • Posting of "No Parking" signs along the affected area. • Installation of temporary signals or signs to direct traffic or other equivalent traffic control measures.			
MM WF-2: Prepare a Construction Fire Protection Plan. For any project proposed under that Plan that would be sited in or adjacent to areas designated as VHFHSZs, prior to construction, the project proponent shall prepare a construction-specific fire protection plan in compliance with CCR Title 8, Article 36, Fire Protection and Prevention. The construction fire protection plan shall include at minimum the following measures to address potential ignition sources during construction: • Parking for workers' vehicles and equipment shall be sited away from dry brush or other ignition sources. • Vehicle idling shall be prohibited. • Personnel must be trained in the practices of the fire safety plan relevant to their duties. Construction and maintenance personnel will be trained and equipped to extinguish small fires to prevent spread. • Smoking in wildland areas shall be prohibited. Smoking shall be limited to paved areas or areas cleared of all vegetation. • Designated vehicles shall carry fire-prevention equipment (e.g., water, shovel, extinguisher) on the construction site at all times during high fire conditions.	During plan development prior to construction and materials submitted; During construction	A. Project proponent shall prepare construction-specific fire protection plan in compliance with CCR Title 8, Article 36, Fire Protection and Prevention and submit to lead agency with construction site plans. B. Project proponent shall implement applicable measures and document implementation with technical memorandum and photographs to be submitted to lead agency for project file.	Lead agency

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
• Fireproof mats or shields shall be used during welding or other construction activities that could produce sparks during high fire risk conditions. • The plan shall include a section demonstrating compliance with applicable plans and policies established by State agencies. In addition, for those projects sited in an area that was recently burned by wildfire, the construction fire protection plan shall include one or more of the following applicable measures: • Treat all wildfire burned areas within the construction area to control stormwater runoff prior to winter rains. • Restore wildfire areas within the construction area by planting native vegetation cover or encouraging the re-growth of native species using best practices as soon as possible to aid in control of stormwater runoff. • Remove dead, woody vegetation along watercourses following a catastrophic fire, as directed by local fire officials. • Post-fire, implement slope stabilization measure by planting native vegetation cover as soon as possible to aid in landslide control, as directed by local fire officials. • Ensure excess storm flow is properly diverted away from important property improvements or unstable slopes. • Check drainage systems and clear out culverts, roof gutters, street gutters, infiltration and detention basins, concrete waterways, etc., to allow water to drain, as directed by local fire officials. • Remove potentially toxic materials, ideally before rain washes toxic runoff into storm drains and waterways, as directed by local fire officials.			

Mitigation Measures	Timeframe for Implementation	Steps for Compliance and Verification	Responsible Monitoring Agency
• Minimize foot traffic, equipment, and disturbance on burned landscapes.			
MM WF-3: Operations Fire Prevention Measures. For projects proposed in or adjacent to areas designated as VHFSZs, the project proponent shall ensure that projects are in compliance with current regulatory codes and that impacts from wildland fire hazards are avoided or reduced to the extent feasible by reducing flammable vegetations around the property's structure and installing sprinklers that activate in the case of fire. In addition, the project shall incorporate ignition resistant construction, and project proponent shall evaluate and confirm accessibility and reliability of firefighting water supply to the project site.	During plan development prior to construction and materials submitted; Ongoing	A. Project proponent shall ensure operations fire prevention measures are incorporated into the site plans and submit to lead agency B. Implement applicable measures. C. Lead agency shall verify implementation of measures via site inspection or review of written documentation and photographs provided by project proponent.	Lead agency