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Governor's Office of Planning & Research

October 20, 2020

**Oct 20 2020**

## STATE CLEARINGHOUSE

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**Subject: Comments on the Notice of Preparation for the Harvard-Westlake River Park Project, SCH #2020090536, Los Angeles County**

Dear Ms. Henry:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Harvard-Westlake River Park Project (Project) Notice of Preparation (NOP) of a draft Environmental Impact Report (DEIR). 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, we appreciate 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's 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, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including 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, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

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## Project Description and Summary

**Objective:** The City of Los Angeles (City) proposes to redevelop an existing golf course and tennis facility on a 17.2-acre site as an athletic and recreational facility for the Harvard-Westlake School and for shared public use. The Project would remove an existing facilities in order to develop two athletic fields with bleacher seating, ancillary field buildings, an 80,249-square-foot multi-purpose gymnasium, a swimming pool with seating, pool house, eight tennis courts with seating, one level of below-grade parking, and a surface parking lot. The Project would include a 1-million-gallon stormwater capture and reuse system. The Project would also provide approximately 5.4 acres of publicly accessible open space and landscaped trails. Project development would require excavation and grading to a maximum depth of approximately 21 feet below grade and a net cut/fill volume of approximately 250,000 cubic yards. During Project activities, 240 of the existing 421 trees would be removed and 350 new trees planted.

**Location:** The Project site is located in the Studio City neighborhood of the City of Los Angeles. The site is bounded on the north by Valley Spring Lane, on the east by Whitsett Avenue, on the south by the Los Angeles River, and on the west by Bellaire Avenue. The is currently used as the Weddington Golf and Tennis Club.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Los Angeles (City; Lead Agency) in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

### Specific Comments

- 1) Tree Replacement. Page 28 of the Initial Study (IS) states that, "[a]s part of the Project, 240 trees would be removed". In urban environments such as this Project site, small pockets of green space and trees are vital habitat to local wildlife. Habitat loss is one of the leading causes of native biodiversity loss.
  - a) CDFW recommends conducting vegetation surveys for the entirety of the Project site (see General Comment 3 below). Page 67 of the IS indicates that, "[a] Tree Report is being prepared for the Project that will identify the number and types of trees located on the Project site." With an appropriate inventory of on-site trees, specific and appropriate recommendations for replacement trees and sensitive vegetation can be made.
  - b) To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees. CDFW recommends replacing native trees with at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.

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- c) CDFW considers California black walnut and oak woodlands as sensitive vegetation communities. Walnut and oak woodlands are communities that includes the trees, as well as any understory plants, duff, and dead logs. Removal or thinning of an understory in a woodland directly impacts the functions and values of the entire woodland. CDFW recommends that any loss of sensitive native trees should be replanted at a minimum 10:1 ratio. Replacement trees should come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.
  - d) CDFW recommends a phased approach to the removal of on-site trees. Removing 240 trees in quick succession could be detrimental to on-site and nearby wildlife that is reliant upon that habitat. A phased approach of removing a portion of trees at a given time allows for wildlife to seek refuge in nearby vegetation without losing the entirety of the habitat at once.
- 2) Nesting Birds. As stated in the IS, 240 of 421 on-site trees will be removed as part of the proposed Project. This vegetation may provide potential nesting habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
- a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
  - b) Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs.
  - c) If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys. Surveys are needed to detect protected native birds occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 a mile for special status species. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
  - d) It should be noted that the temporary exclusion of Project activities within nesting buffers during nesting season may not constitute effective mitigation for the purposes of offsetting Project impacts associated with loss of breeding and nesting habitat. Effective mitigation for impacts to nesting habitat for birds requires structurally (e.g.,

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ground cover, subshrubs, shrubs, and trees) and species diverse vegetation as a part of habitat restoration.

Additional mitigation, separate from impacts to vegetation communities, would be necessary to compensate for the temporal or permanent loss of occupied nesting habitat within the Project site. CDFW recommends the qualified biologist/City consult with CDFW to determine proper mitigation for impacts to occupied habitat. Mitigation would be based on acreage of impact and vegetation composition. Depending on the status of the bird species impacted, replacement of habitat acres should increase with the occurrence of a California Species of Special Concern (SSC). Replacement acres would further increase with the occurrence of a CESA-listed species.

- 3) Non-Native Plants and Landscaping. The Project may involve significant landscaping for aesthetic purposes. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site, similar to species found in adjacent natural habitats.
  - a) If the Project may involve landscaping, CDFW recommends the DEIR provide the landscaping plant palette and restrict use of species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2020). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.
  - b) If non-native invasive plants are on site, CDFW recommends the DEIR provide measures to reduce the spread of non-natives during Project construction and activities. Spreading non-native plants during Project activities may have the potential to impact areas not currently exposed to non-native plants. This could result in expediting the loss of natural habitats in and adjacent to the Project site and should be prevented.
- 4) Hydrology. The proposed Project involves grading and contouring the Project site and installing 1-million-gallon stormwater capture and reuse system. Due to the proximity of the Project site to the Los Angeles River, CDFW has concerns that Project activities could impact the volume and quality of water flowing offsite and directly into the adjacent river. A hydrology report should be presented for the Project that includes components such as: newly designed topography, an analysis of runoff in future storm events, and a comparison of retained volumes of water versus historic volumes of stormwater runoff.

### **General Comments**

Despite the urban setting of the Project site, small patches of open space and clusters of trees are vital habitat for local wildlife populations. The proximity of the Project site to the Los Angeles River increases its potential to serve as supporting habitat for local and migratory wildlife. Preventing the loss of function of these important habitats is imperative in the face of constant urbanization. The following comments should be addressed in a subsequent Draft Environmental Impact Report (DEIR) to reduce the significant impact the Project may have on the Project area.

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- 1) Disclosure. A DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
  - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated (CEQA Guidelines, § 15126.6). CDFW recommends Regional Planning consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to rare plants, oak trees, and oak woodlands. CDFW also recommends Regional Planning consider establishing appropriate setbacks from rare plants, oak trees, and oak woodlands. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. Project alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).
- 3) Biological Baseline Assessment. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific avoidance or mitigation measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures [CEQA Guidelines, §§ 15064, 15065, 15125(c), and 15380]. The DEIR should provide the following information:
  - a) Regional setting. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)].
  - b) Database search. An updated and thorough assessment of biological resources in nine quadrangles containing the Project site and surrounding areas. A 5-mile radius should be applied for a database search of raptors. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any recently reported sensitive wildlife, plants, and sensitive plant

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- communities (CDFW 2020a). In addition, CDFW recommends an updated search for rare plants from Calflora's [Information on Wild California Plants database](#) (Calflora 2020) and CNPS [Inventory of Rare and Endangered Plants of California database](#) (CNPS 2020b).
- c) Rare plant mapping. An updated and thorough floristic-based assessment of special status plants following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site. Species-specific surveys would identify any areas where these species occur which would help inform plans to fully avoid these areas/impacts and/or appropriate mitigation measures. The DEIR should disclose specific impacts to sensitive plants and habitat and provide measures to fully avoid Project-related impacts.
- d) Sensitive vegetation community mapping. An updated and thorough floristic-based alliance- and/or association-based mapping of sensitive vegetation communities and impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer 2008). CDFW only tracks rare natural communities using the MCV classification system. CDFW considers sensitive vegetation communities as threatened habitats having both regional and local significance. Vegetation communities, alliances, and associations with a state-wide ranking of S1, S2, S3, and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting CDFW's [Vegetation Classification and Mapping Program webpage](#) (CDFW 2020c). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. The DEIR should fully disclose specific impacts to sensitive vegetation communities and provide measures to fully avoid Project-related impacts.
- e) Wildlife. A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). The DEIR should include a nine-quadrangle search of [CNDDB](#) (CDFW 2020a) to determine a list of species potentially present at the Project site. A larger search area may help account for change in species range and distribution, especially due to climate change effects. Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Many wildlife species utilize fossorial mammal dens and burrows as habitat structure. Typically, a field survey includes the Project site and a 500-foot buffer. Focused species-specific are required and should be conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Acceptable species-specific survey procedures should be developed in consultation with CDFW and USFWS. Survey protocols and guidelines for special status plants and wildlife may

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be found on [CDFW's Survey and Monitoring Protocols and Guidelines webpage](#) (CDFW 2018).

- 4) Direct, Indirect, and Cumulative Biological Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DEIR:
  - a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.). Impacts on wildlife corridor/movement areas, including maintenance, staging areas, and access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
  - b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species along with identification of any mitigation measures.
  - c) A discussion on any potential Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included.
  - d) An analysis of impacts from land use and zoning designations located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
  - e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, including past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 5) Lake and Streambed Alteration Agreement (LSA). The Project has the potential to be subject to notification for a Lake and Streambed Alteration Agreement (LSA).
  - a) As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. This would include any construction activity that would involve temporary work in the bed, bank, or channel of a stream. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA

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with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR 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](#) (CDFW, 2020b).

- b) The Project area is located in areas that may support aquatic, riparian, and/or wetland habitats; therefore, CDFW recommends an investigation of the site for possible surface drainages in the surrounding areas that may feed into these creeks or channels. A preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service (USFWS) wetland definition adopted by the CDFW (Cowardin et al. 1970). Some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' section 404 permit and Regional Water Quality Control Board section 401 Certification.
  - c) In areas of the Project site that may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR.
- 6) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 7) Moving out of Harm's Way. To avoid direct mortality, we recommend that a qualified biological monitor, approved by CDFW, be on-site prior to and during ground and habitat disturbing activities. The biological monitor may need to move any special status species or other wildlife of low mobility out of harm's way that would likely be injured or killed by Project-related construction activities, such as grubbing or grading. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

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CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits webpage](#) for information (CDFW 2020d)

- 8) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable, thus not adequately mitigating the loss of biological functions and values, off-site mitigation through habitat creation, acquisition, and/or preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity through a conservation easement, with financial assurance and dedication to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

## CONCLUSION

CDFW appreciates the opportunity to comment on the Notice of Preparation to assist the City of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at (562) 292-6821 or by email at [Andrew.Valand@wildlife.ca.gov](mailto:Andrew.Valand@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Erinn Wilson  
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