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December 8, 2020

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Subject: Comments on the Notice of Preparation for the Hsi Lai Monastery Site Project, SCH #2020110040, Los Angeles County

Dear Jolee Hui:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) from the Los Angeles County Department of Regional Planning (County; Lead Agency) for the Hsi Lai Monastery Site Project (Project). 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.

Project Description and Summary

Objective: The Project consists of the development of a monastery retreat center with associated accessory uses on a 28.96-acre site. The Project would involve:

- Development of 17 buildings concentrated on the northern portion of the site [Assessor's Parcel Number (APN) 8240-036-021];
- Renovation of one existing 5,318 square-foot residential building into a volunteers' dormitory (APN 8291-035-021);
- Construction of a total of 297 parking spaces via a seven-level subterranean garage;
- Development of a new multi-use public trail along the southeasterly portion of the site (APN 8291-035-020). The remaining portion of the site would remain undeveloped except for new landscaping and walkways.

Location: The Project site is located at 15866 Draper Road, Hacienda Heights, CA 91745 (west of Hacienda Boulevard). The Project site is directly across from the existing Fo Guang Shan Hsi Lai Temple at 3456 Glenmark Drive. APNs associated with the proposed Project are 8240-036-021, 8291-035-020, and 8291-035-021.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County 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) Impacts from trail expansion and recreational use. The proposed Project designs include the construction of a new public nature trail along the southern portion of the Project site. Page 92 of the IS states, "the establishment of a trail along the southeasterly portion of the property could result in potential impacts to the existing oak woodland habitat and a drainage feature." Recreational trails are known to impact surrounding habitat through several ways: increased traffic, loss of habitat from erosion, increased noise, increased trash or pet waste, and introduction of invasive species from other sites.

    a) Understanding wildlife responses to recreation and the area of influence of human activities may help managers judge whether wildlife populations are experiencing stress due to interactions with humans. CDFW recommends including an analysis of recreational usage of the trail system in which current levels of traffic (hiker, biker, and dog) are compared to the expected increase in traffic as a result of trail expansion and improvements. This analysis may aid in tailoring recreation plans to minimize long-term effects to wildlife from disturbance.

    b) CDFW recommends setting aside conserved acreage of sensitive vegetation communities in a manner that is isolated and free from influence by recreational usage.

These conserved areas should be oriented to provide refugia for species that may be flushed or relocated by the presence of trails.

For proposed preservation and/or restoration, the environmental document should include measures to protect the targeted habitat values in perpetuity from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be provided for the long-term monitoring and management of mitigation lands. CDFW recommends that mitigation occur at a state-approved bank or via an entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012), which amended Government Code sections 65965-65968. Under Government Code section 65967(c), 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.

c) Educational materials. Educational materials and signage should be made available to trail users to keep aware of the impacts that human disturbance brings to open spaces. Hikers should be made aware of the impacts that they have on surrounding habitat (such as noise or smells), particularly during breeding seasons.

d) Signage. CDFW recommends the County install appropriate public information signage at trailheads to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and, 4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife such as spikes or glass. The County should provide a long-term maintenance plan to repair and replace the signs.

e) Restrictions on recreational use. Restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use to trails near active breeding habitat, will aid in minimizing disturbance. Pets should be kept on leash and on trails at all times. Hikers should be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.

f) Trash receptacles. Trash receptacles should be placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

2) Tree Replacement. Appendix B-2 (Oak Tree Report) indicates that at least 5 cork oak trees (*Quercus suber*) and 10 coast live oak trees (*Quercus agrifolia*) will be removed and at least 18 other coast live oaks will be impacted (via encroachment) by Project activities. Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). As a vegetation community, oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding; regulating water flow in

watersheds; and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. CDFW considers oak woodlands a sensitive vegetation community.

a) Oak woodlands. CDFW recommends a qualified botanist identify impacts to oak woodlands. The DEIR should provide a vegetation community map showing where oak woodlands occur in the Project site; where impacts to oak woodlands would occur; and, total acreage of oak woodlands impacted in each separate area. Oak woodlands are structurally diverse vegetation communities. Accordingly, for each area of oak woodland impacted, provide a list of both native and non-native understory plants present. A list should be organized by layer and/or life form such as vine, groundcover, forb, subshrub, shrub, and tree. For each area, also provide the abundance, density, and cover of each plant species and vegetation layer impacted.

b) Avoidance and Disclosure of Potential Impacts. CDFW recommends the DEIR provide measures to avoid impacts to oak trees and oak woodlands during and after Project construction to the extent feasible. Avoidance measures should be effective, specific, enforceable, and feasible. During the Project, the County should provide measures to fully protect the Critical Root Zone of all oak trees not targeted for removal from ground disturbance activities. The County should also provide measures to protect the outer edge of oak woodlands with appropriate setbacks. After the Project, CDFW recommends oak trees and woodlands be protected by including into the final project design appropriate setbacks between the Project footprint and protected oak woodlands.

   For unavoidable Project impacts, adequate disclosure includes providing the following information at a minimum: 1) location of each tree and area of oak woodland impacted shown as a point feature or polygon on a map; 2) scientific (Genus, species, subspecies, or variety) and common name of each tree and understory plant species impacted; 3) the size (diameter at breast height, inches) of each tree impacted; 4) a clear identifier to distinguish heritage trees; 5) acres of oak woodlands impacted; 6) mitigation ratio for individual trees and acres of oak woodlands; 7) total number of replacement trees and acres of oak woodlands; and, 8) total number of replacement trees and appropriate understory species, to occur in suitable on- and/or off-site mitigation lands.

c) On- or Off-Site Mitigation. CDFW recommends creating or restoring on- or off-site oak woodland habitat at a ratio comparable to the Project's level of impacts to individual oak trees and acres of oak woodland habitat. The DEIR should provide an on- or off-site mitigation plan and discuss the suitability of selected location(s) for mitigating impacts to oak trees and oak woodlands. The mitigation plan should include information about reference sites, with similar species and habitat to the mitigation site, and the suitability of selected reference site(s). Lastly, a mitigation plan should provide specific mitigation goals and actions to achieve those goals to establish self-sustaining oak trees and oak woodlands.

3) Nesting Birds. As indicated in the Oak Tree Report, at least 33 on-site trees will be impacted as part of the proposed Project. This vegetation may provide potential nesting habitat where Project activities may impact nesting birds. During 2018 biological surveys reported in the

IS, coastal cactus wren (*Campylorhynchus brunneicappilus sandiegensis*), a California Species of Special Concern (SSC), was observed on the Project site. A review of CNDDB indicates that there are historic observations of coastal California gnatcatcher (*Polioptila californica californica*), also an SSC, within two and a half miles to the east and west of the project site. Page 32 of the IS acknowledges the potential for impacts to gnatcatcher by stating that, "the [P]roject site is in a larger overall area designated by the USFWS as critical habitat for the coastal California gnatcatcher".

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

4) Impacts to Aquatic and Riparian Resources. The proposed Project is likely to result in loss of riparian habitat. Figure 4: Jurisdiction Delineation on page B-1 shows that the proposed Project may impact as many as five distinct drainages. The Jurisdictional Delineation provided in the IS estimates that 1.818 acres of streambed are found on the Project site. Waters from the Project site are likely to drain into the Hacienda Channel, which then connects to San Jose Creek and ultimately to the San Gabriel River. Downstream riparian resources may be impacted by water flowing from the Project site.

a) Lake Streambed Alteration (LSA) Agreement. 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. 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 Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA Agreement 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 Agreement.

b) Hydrological Evaluation. As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR discuss the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

c) Delineation. The IS identified five drainages within the Project site. A preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The DEIR should evaluate all rivers, streams, and lakes, including culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.

d) Changes to Drainage Patterns. Project-related impacts, temporary, and permanent changes in drainage patterns, runoff, and sedimentation should be thoroughly evaluated in the DEIR. Project construction and activities may cause erosion and landslides, resulting in siltation in the stream adjacent to the Project site. Development on top of a hill/in areas with 25 percent or greater natural slopes may have long-term, permanent impacts to the stream and riparian vegetation. Impervious surfaces would divert water, increase runoff, and impact groundwater infiltration.

e) Oak Trees. Most of the oak trees in the Project site are located on steep slopes. Removing oak trees, or the action of, may temporarily or permanently divert or increase surface water flow, increase slope instability, and increase erosion. CDFW recommends the DEIR thoroughly evaluate and disclose the potential for soil erosion and landslides during and after oak tree removal, and whether this may impact wetland resources during and after the Project. CDFW recommends avoiding impacts to oak trees to avoid or minimize impacts to wetland resources.

f) Setbacks. In areas of the Project site which may support perennial, intermittent, or 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. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and after the Project from any future development.

5) Habitat connectivity and wildlife movement. Page 33 of the IS states, "the [P]roject site's vegetation communities and habitats contribute to supporting wildlife movement in the Puente Hills (and beyond to the Chino Hills and Santa Ana Mountains) as well as provide a buffer from urban land uses for open spaces to the south of the [P]roject site." Maintaining the Puente-Chino Hills Wildlife Corridor's ecological integrity and bolstering the function of its constituent linkages are widely recognized as important conservation objectives within the densely urbanized Los Angeles Basin (Spencer 2005).

   The proposed Project site lies immediately in a vital chokepoint in the Puente-Chino Hills Wildlife Corridor and presents impacts to that corridor beyond the physical loss of space represented in the construction footprint. The current underpass, located just south of Draper Road & Hacienda Boulevard, is believed to drastically underused, likely due to poor visibility, high domestic dog use, lack of natural cover, and poor overall design implementation.

   a) Maintaining wildlife corridors and habitat continuity is essential for wildlife survival and is increasingly important considering habitat loss and climate change. In preparation of the DEIR, CDFW recommends the County conduct studies to document wildlife activity and movement through the Project site. The results, including mapped data, and a discussion of how the Project may affect wildlife movement and dispersal should be provided. The DEIR should also include mitigation measures that would address the reduction of wildlife corridor and impacts to wildlife movement.

   b) Design alternatives should be presented for wildlife crossings along Hacienda Boulevard, found along the eastern edge of the property. The current undercrossing is an L-shaped concrete box tunnel that sees little use beyond raccoons and cats (Haas and Crooks 1999). It lacks many of the design elements that are generally recommended for a successful wildlife crossing of a high-traffic road. Among the commonly recommended elements are:

      - A clear line-of-sight from one end of the crossing to the other
      - Fencing to guide wildlife toward the intended crossing and not across the road
      - Providing cover and escape or refuge areas such as piles of brush, stone, or large woody debris should help movement under structure and between preferred habitats

      The design of an effective wildlife crossing can vary greatly, just like the locations in which they are implemented. Surrounding habitat, topography, targeted species, and hydrology all need to be considered when designing and implementing a crossing. CDFW recommends consulting the Wildlife Crossing Structure Handbook Design and Evaluation in North America to generate alternatives for wildlife crossings adjacent to the Project site.

6) Los Angeles Significant Ecological Areas. The proposed Project would occur among portions of a Los Angeles Significant Ecological Areas (SEA), specifically the Puente Hills SEA (Department of Regional Planning 2019). CDFW recommends the DEIR provide a thorough disclosure, analysis, and discussion of the Project's potential to encroach upon or impact the Puente Hills SEA. Project related impacts include construction and activities, including all staging areas; vehicle and worker parking areas; ingress and egress routes; and areas subject to Project ground disturbing activities. If the Project would impact biological resources within a SEA, the environmental document should be conditioned to provide avoidance and/or mitigation measures.

General Comments

The proximity of the Project site to nearby open space in the Puente Hills 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 the DEIR to reduce the significant impacts that Project related activities may have on the Project area.

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 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 (CNDDB) in Sacramento should be contacted to obtain current information on any recently reported sensitive wildlife, plants, and sensitive plant communities (CDFW 2020a). In addition, CDFW recommends an updated search for rare plants from Cal flora'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 2020b). 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 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) 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.

6) 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.

   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 2020c).

7) Non-Native Plants and Landscaping. The Project may involve significant landscaping for aesthetic purposes. 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 Draft Environmental Impact Report (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

CONCLUSION

CDFW appreciates the opportunity to comment on the Notice of Preparation to assist the County of Los Angeles Department of Regional Planning 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.

Sincerely,

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