



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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*GAVIN NEWSOM, Governor*  
*CHARLTON H. BONHAM, Director*



September 16, 2021

Governor's Office of Planning & Research

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**September 16 2021**

**STATE CLEARINGHOUSE**

**Subject: Revello Drive and Tramonto Drive Residential Project, Mitigated Negative Declaration, SCH #2021080308, Los Angeles County**

Dear Mr. Baranghoori:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study Mitigated Negative Declaration (MND) for the Revello Drive and Tramonto Drive Residential Project (Project) proposed by the City of Los Angeles (City/Lead Agency). The MND's supporting documentation includes Appendix B Biological Resource Letter Report (BRR). 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 state-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 Project consists of the construction of four single-family residences proposed by two different ownership groups [Springhouse Hamilton Park, LLC (SHP) and JDR Revello, LLC (JDR)]. There will be two primary staging and parking areas during construction. The staging/parking area for SHP House 1 will be on site behind the building footprint. This staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The staging/parking area for the three homes on Revello (i.e., SHP House 2 and JDR Houses 1 and 2) will be located west of the current terminus of Revello Drive between JDR House 2 and SHP House 2. This staging/parking area will be a relatively flat pad that is approximately 36 feet wide by 180 feet long. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

**Location:** The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, California. The Project-site totals approximately 1.33 acres and is surrounded by single-family residences with small-sized lots primarily dominated by planted landscaping. The Project is south of Tramonto Drive, west of Sunset Boulevard, and north of the Pacific Coast Highway (PCH), and approximately 0.2-mile northwest of the intersection of Sunset Boulevard and PCH. The Los Angeles County Assessor's Parcel Numbers (APN) associated with the Project are: 4416-011-003, 4416-011-004, 4416-011-006, 4416-021-003, 4416-021-004, 4416-021-005, 4416-021-006, 4416-021-007, 4416-021-008, 4416-021-015, 4416-021-016, and 4416-021-060.

## Comments and Recommendations

The City submitted Project-related documents for an informal consultation with CDFW on April 20, 2021 [CEQA Guidelines, § 15063(g)]. CDFW submitted consultation comments to the City on May 25, 2021. CDFW offers the comments and recommendations below to assist the City of Los Angeles 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

#### Comment #1: Potential Impacts to Monarch Butterflies

**Issue:** The Project may impact monarch butterfly (*Danaus plexippus* population 1 – California overwintering population) and monarch butterfly overwintering habitat.

**Specific impacts:** The Project could remove and impact potential overwintering habitat for monarch butterflies. Vegetation removal and tree trimming could have a negative effect on monarch butterflies by causing injury or mortality; reducing health and vigor; and reducing reproductive success. Permanent or temporary impacts on overwintering habitat could result in local population decline or local extirpation of monarch butterflies.

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**Why impact would occur:** In western North America, monarch overwintering sites are distributed along the California coast from Mendocino County to the Mexican border, and south into Baja California, Mexico (Xerces Society 2017). Monarch butterflies cluster in large groups in forested groves along the California coast. The Project site could provide an overwintering grove for monarch butterflies because of its location relative to the coast, proximity to known overwintering sites, and support of wintering trees. According to CNDDDB there are four records of monarch overwintering sites within 3 miles of the Project site, the closest one, approximately 0.3 miles west of the Project site.

The Project may require trees and other vegetation to be removed or trimmed in order to facilitate building construction. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites. Furthermore, removing trees could reduce or eliminate overwintering habitat, potentially leading to local population decline or local extirpation of monarch butterflies.

**Evidence impact would be significant:** The MND does not provide any information as to the Project's potential impacts on monarch butterflies and overwintering habitat. CDFW is unable to comment on whether the Project would impact monarch butterflies and overwintering habitat, where impacts would occur, and if impacts would be significant.

Monarch numbers have dropped by 99 percent from an estimated 4 million butterflies just twenty years ago (CDFW 2021a). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2021a). The monarch butterfly is included on CDFW's [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) list and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#) (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. 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 in local or regional plans, policies, or regulations, or by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

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### Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #1:** If the Project-site supports an overwintering grove/population of monarchs, CDFW recommends the City require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City should require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. The Monarch Butterfly Overwintering Habitat Management Plan should provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions should include:

- *Protect:* Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- *Manage:* Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present in the southern California coast.
- *Enhance:* Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.
- *Restore:* Any trees removed as part of the Project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menziesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- *Pesticides:* Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- *Tropical milkweed and pathogens:* Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location.

**Mitigation Measure #2:** If the Project-site does not support overwintering habitat, CDFW recommends the City require the Project proponent to avoid and minimize impacts on monarch

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butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

**Recommendation #1:** CDFW recommends the following resources for information on managing monarch overwintering habitat:

- [Western Monarch Butterfly Conservation Plan](#) (WAFWA 2019);
- [Overwintering Site Management and Protection](#) (Western Monarch Count 2021);
- [Protecting California's Butterfly Groves](#) (Xerces Society 2017);
- [Managing Monarch Habitat in the West](#) (Xerces Society 2021);
- [Monarch Butterfly Nectar Plant Lists for Conservation Plantings](#) (Xerces Society 2018);
- [Tropical Milkweed](#) (Wheeler 2018); and,
- CDFW's [Monarch Butterfly](#) webpage page (CDFW 2021a).

**Recommendation #2:** CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.

**Recommendation #3:** CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.

### **Additional Recommendations**

Impacts to Bats. The Project includes activities that will result in the removal of trees and vegetation that may provide habitat for western mastiff bat (*Eumops perotis* ssp. *californicus*), a California Species of Special Concern (SSC), as identified in the BRR. The BRR states, "This species is not likely to roost on site due to the lack of suitable roosting trees or rocky habitat. Therefore, impacts to special-status wildlife would be considered less than significant."

Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential foraging habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.

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Impacts to Sensitive Vegetation. MM-BIO-1 in the Initial Study states, “the project applicant shall purchase restoration or creation credits of at least 2:1 (1.12 acres for 0.56 acres impacted) to mitigate the project’s impact on the sensitive-status Lemonade Berry Scrub vegetation community to a less-than-significant level.” However, section 5.1 *Minimization and Mitigation Measures for Special-Status Vegetation Communities* of the BRR states, “The project applicant, or its designee, shall provide mitigation bank funding at 3:1 (1.68 acres) to replace special-status vegetation communities (i.e., lemonade berry scrub) removed due to project construction and fuel modification activities.” CDFW supports the minimization and mitigation measure presented in the BRR to mitigate for impacts to sensitive vegetation communities.

CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits. The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City’s issuance of grading permits.

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted as stated in the Initial Study, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Rodenticides. CDFW recommends project proponent prevent the use of second-generation anticoagulant rodenticides on any project associated with the Project.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA document include measures where lead agencies of individual projects tiering from the subsequent CEQA document report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the [Online Field Survey Form](#) (CDFW 2021b). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.

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Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City 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 the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

### Filing Fees

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

### Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov) or (562) 292-8105.

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

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Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

cc: CDFW

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**GAVIN NEWSOM, Governor**  
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CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
<b>MM-BIO-1-Monarch Overwintering Habitat</b>	<p>If the Project site supports an overwintering grove/population of monarchs, the City shall require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City shall require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan shall be submitted to the City before the City adopts the Century Villages at Cabrillo Specific Plan and a Long Beach Zoning Ordinance and Zoning Map Amendment. The Monarch Butterfly Overwintering Habitat Management Plan shall provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions shall include:</p> <ul style="list-style-type: none"> <li>• <i>Protect</i>: Trees shall not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal shall be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs shall not be removed in overwintering groves. Shrubs shall be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.</li> <li>• <i>Manage</i>: Management activities, such as tree trimming and mowing, shall be conducted in groves from March 15 through September 15 outside of the estimated</li> </ul>	Prior to Construction	City of Los Angeles

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	<p>timeframe when monarchs are likely present in the southern California coast.</p> <ul style="list-style-type: none"> <li>• <i>Enhance</i>: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.</li> <li>• <i>Restore</i>: Any trees removed as part of the Project shall be replaced with trees at no less than 2:1. Native insecticide-free trees shall be planted such as Monterey pine (<i>Pinus radiata</i>), Monterey cypress (<i>Cupressus macrocarpa</i>), Coast redwood (<i>Sequoia sempervirens</i>), coast live oak (<i>Quercus agrifolia</i>), Douglas fir (<i>Pseudotsuga menziesii</i>), Torrey pine (<i>Pinus torreyana</i>), western sycamore (<i>Platanus racemosa</i>), bishop pine (<i>Pinus radiata</i>) and others, as appropriate for location.</li> <li>• <i>Pesticides</i>: Use of pesticides shall be avoided, particularly when monarchs may be present. If pesticides are used, applications shall be conducted from March 15 through September 15, when possible. Herbicide shall not be applied on blooming flowers. Herbicide shall be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods shall be used, large-scale broadcast applications shall be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, shall not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants shall not be used. Non-chemical weed control techniques shall be used when possible.</li> <li>• <i>Tropical milkweed and pathogens</i>: Non-native tropical</li> </ul>		
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	<p>milkweed shall not be planted in order to minimize the spread of the pathogen <i>Ophryocystis elektroscirrha</i> (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed shall be removed and replaced with native, insecticide-free nectar plants suitable for the location.</p>		
<b>MM-BIO-2- Monarch Overwintering Habitat</b>	<p>If the Project site does not support overwintering habitat, the City shall require the Project proponent to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.</p>	Prior to Construction	City of Los Angeles Project Proponent
<b>REC-1- Monarch Overwintering Habitat</b>	<p>CDFW recommends the following resources for information on managing monarch overwintering habitat:</p> <ul style="list-style-type: none"> <li>• <a href="#">Western Monarch Butterfly Conservation Plan</a> (WAFWA 2019);</li> <li>• <a href="#">Overwintering Site Management and Protection</a> (Western Monarch Count 2021);</li> <li>• <a href="#">Protecting California's Butterfly Groves</a> (Xerces Society 2017);</li> <li>• <a href="#">Managing Monarch Habitat in the West</a> (Xerces Society 2021);</li> <li>• <a href="#">Monarch Butterfly Nectar Plant Lists for Conservation Plantings</a> (Xerces Society 2018);</li> <li>• <a href="#">Tropical Milkweed</a> (Wheeler 2018); and,</li> <li>• CDFW's <a href="#">Monarch Butterfly</a> webpage page (CDFW 2021a).</li> </ul>	Prior to Construction	City of Los Angeles
<b>REC-2- Monarch Overwintering Habitat</b>	<p>CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for</p>	Prior to Construction	City of Los Angeles Project Proponent

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	<p>the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project’s environmental document.</p>		
<p><b>REC-3- Monarch Overwintering Habitat</b></p>	<p>CDFW recommends the City recirculate the Project’s environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.</p>	<p>Prior to Construction</p>	<p>City of Los Angeles</p>
<p><b>REC-4-Impacts to Bat Species</b></p>	<p>Prior to construction activities, a qualified bat specialist shall conduct bat surveys within the Project area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and</p>	<p>Prior to Construction</p>	<p>Project Proponent</p>

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	submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.		
<b>REC-5-Impacts to Sensitive Vegetation</b>	CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits.	Prior to Construction	Project Proponent
<b>REC-6- Impacts to Sensitive Vegetation</b>	The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City's issuance of grading permits.	Prior to Construction	Project Proponent
<b>REC-7-Nesting Birds</b>	CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted as stated in MM BIO-2, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.	Prior to Construction	Project Proponent
<b>REC-8-Rodenticides</b>	CDFW recommends the City exclude the use of second-generation anticoagulant rodenticides for all subsequent individual projects.	During the life of the Project	Project Proponent
<b>REC-9-Data</b>	Project-level lead agencies shall ensure sensitive and special status species data has been properly submitted to the <a href="#">California Natural Diversity Database</a> with all data fields applicable filled out. Confirmation of data submittal shall be provided to CDFW.	Prior to Construction	Project Proponent
<b>REC-10- Mitigation and Monitoring Reporting Plan</b>	The City should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures	Prior to finalizing MND	Project Proponent

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	recommended in this letter. the City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.		
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