



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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April 11, 2023

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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



**Subject: Comments on the Mitigated Negative Declaration for the Wilmington Avenue Bridge over Compton Creek, SCH #2023030480, Los Angeles County**

Dear Ms. Soriano:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study/Mitigated Negative Declaration (MND) from the Los Angeles County Public Works (LACPW; Lead Agency; hereafter “County”) for the Wilmington Avenue Bridge over Compton Creek 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; 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 California Environmental Quality Act (CEQA), CDFW is directed to provide biological expertise to lead agencies as part of environmental review, focusing on project 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 (LSA) regulatory authority (Fish & G. Code, § 1600 *et seq.*) and the California Endangered Species Act (CESA; Fish & G. Code, § 2050 *et seq.*). To the extent implementation of the Project as proposed may result in “take”, as defined by State law, or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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## Project Description and Summary

**Objective:** The County is proposing the implementation of the Project, which involves the replacement of the existing two-span, steel-girder Wilmington Avenue Bridge with a new two-span, precast concrete bridge. The Project includes the reconstruction of the sidewalks adjacent to the Project limits. The existing steel girder bridge and middle pier have been determined to be structurally deficient per the California Department of Transportation (Caltrans) Bridge Design Specification and Caltrans Seismic Design Criteria due to extensive cracking and delamination of the bridge deck. The Project would address structural deficiencies and improve vehicular safety and efficiency. The Project has been designed to be consistent with current Caltrans' adopted bridge design specifications regarding load carrying capacity.

**Location:** The Project is located in the City of Compton, southern Los Angeles County, California. The Project site is located in the northwest portion of the city where the Wilmington Avenue right-of-way (ROW) crosses Compton Creek, 500 feet north of the Compton Boulevard/Wilmington Avenue intersection. Wilmington Avenue is a large, north-south running road with two lanes in either direction. The Project site consists of 1.72 acres and includes the bridge and roadway approach. Within the Project area, Wilmington Avenue includes a central, 13-foot-wide raised median that divides northbound and southbound traffic over the bridge deck. Two 4.5-foot-wide public sidewalks extend on either side of Wilmington Avenue. Although there are no dedicated bikeways within the Wilmington Avenue ROW, an existing bikeway extends parallel to the Compton Creek channel's northern bank on either side of Wilmington Avenue. The Project site crosses Compton Creek, a major tributary of the Los Angeles River. Compton Creek drains a watershed area of approximately 42.1 square miles, and it travels south for 8.5 miles from South Main Street in the City of Los Angeles until it meets the Los Angeles River south of Del Amo Boulevard in the City of Carson. Compton Creek is encased within a concrete-lined flood control channel for most of its course, including where it runs underneath the Project site.

## 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.

### Comment #1: Impacts to Streams

**Issue:** CDFW is concerned that the Project would impact streams subject to Notification under Fish and Game Code section 1602 *et seq.*

**Specific impacts:** According to sections 2.4 and 2.5 of the MND, the Project would include demolition and construction activities within the stream channel. The existing bridge and proposed replacement bridge span the stream channel.

**Why impacts would occur:** Project activities include demolition of existing paved surfaces within the stream, demolition of existing bridge structures, excavation, grading, potential surface water diversion, auger drilling, bridge construction, and continued bridge operations. As stated in section 3.4 of the MND, these Project activities could result in temporary or permanent impacts to streams.

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**Evidence impacts would be significant:** CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 *et seq.* to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated plant communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following: divert or obstruct the natural flow of any river, stream, or lake; change the bed, channel, or bank of any river, stream, or lake; use material from any river, stream, or lake; or, deposit or dispose of material into any river, stream, or lake.

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

**Mitigation Measure #1:** The Project will result in the alteration of streams. As such, CDFW concurs with the Project's proposal to notify CDFW pursuant under Fish and Game Code section 1600 *et seq.* Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. Please visit CDFW's [Lake and Streambed Alteration Program webpage](#) for information about the LSA Notification process and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2023a).

**Recommendation #1:** CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

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

**Comment #2: Impacts on Bats**

**Issue:** The Project includes activities that may remove or disturb roosting habitat for bats, including bat species that are California Species of Special Concern (SSC; CDFW 2023c).

**Specific impacts:** According to Section 3.4 of the MND and a review of the California Natural Diversity Database (CNDDDB), the following bat species could occur in or near the Project site:

- Pallid bat (*Antrozous pallidus*);
- Western mastiff bat (*Eumops perotis californicus*);
- Silver-haired bat (*Lasionycteris noctivagans*);
- Western red bat (*Lasiurus frantzi*);
- Hoary bat (*Lasiurus cinereus*);
- Western yellow bat (*Lasiurus xanthinus*);

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- Pocketed free-tailed bat (*Nyctinomops femorosaccus*); and
- Big free-tailed bat (*Nyctinomops macrotis*).

Several of these bat species are designated as SSC. However, there are many bat species that can be found year-round in urban areas throughout coastal southern California (Miner & Stokes 2005). Project activities may include removal or disturbance of structures that could provide roosting habitat for bats. Accordingly, the Project has the potential to injure, cause the mortality of, trap, and displace bats.

**Why impacts would occur:** The Project may result in direct impacts on bats (injury and mortality) by demolishing structures that may provide roosting habitat. Indirect impacts on bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading, drilling), and vibrations caused by heavy equipment. Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston *et al.* 2004). Human disturbance can lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston *et al.* 2004). There is no indication in the MND that species-specific surveys for bats have been or will be conducted. Without focused surveys to detect bats, ground-disturbing, demolition, and construction activities associated with this Project may impact undetected bat species within the Project area. This may lead to a loss of occupied habitat, loss of juveniles in maternity roosts, or otherwise lead to roost abandonment or decreased feeding frequency in bat species.

**Evidence impacts would be significant:** Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC. CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

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

**Mitigation Measure #1 – Acoustic Surveys for Bats:** Where Project-related implementation, construction, and activities would occur near potential roosting habitat for bats, CDFW recommends the County retain a qualified bat specialist to conduct bat surveys within these areas (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 using acoustic recognition technology to maximize detection of bats. 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

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County prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

**Mitigation Measure #2 – Maternity Roosts:** If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

**Mitigation Measure #3 – Maternity Roosts:** If maternity roosts are found and the County determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those structures or trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize the detection of bats. Each structure or tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before sunset and 30 minutes after sunrise.

### **Additional Recommendations**

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). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor. CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors.

CDFW recommends avoiding habitat-disturbing construction activity during nesting season. If not feasible, CDFW recommends modifying MM BIO-1 by including the underlined language and excluding the ~~strikethrough~~ as follows:

To avoid potential direct and indirect impacts to nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, project activities should avoid the general nesting season of February 1 through September 30. If this season cannot be avoided, then a pre-construction clearance survey should be conducted seven days prior to project activities to determine the presence/absence of any nesting bird species within a 500-foot radius of the proposed project work area including under the bridge deck and in vegetation within ~~300 feet (for non-raptor bird species) and 500 feet (for raptor species)~~ of the proposed work area. If project activities are delayed or suspended for more than 7 days during the nesting season, new nest surveys should be conducted. If an active bird nest is found within the bridge deck, work would not be able to proceed until the nest is determined to be inactive (fledged or failed) by a qualified biologist. If an active bird nest is found within portions of the survey area adjacent to the bridge, an avoidance buffer will be established around the nest, based on the species sensitivity to disturbance and proximity to impact areas. The buffer will remain in place as long as the nest is considered active, as determined by an on-site monitor. No encroachment into

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the buffer may occur within the consent of the on-site monitor, as long as a nest is still active.

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. Mitigation ratios should increase with the occurrence of an SSC and should further increase with the occurrence of a CESA-listed species.

Scientific Collecting 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 2023b). Pursuant to the California Code of Regulations, title 14, section 650, the County or its qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with construction activities.

Rodenticides. CDFW recommends preventing the use of second-generation anticoagulant rodenticides on site and over the life of 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) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2023d). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The County should provide CDFW with confirmation of data submittal.

### **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).

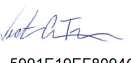
### **Conclusion**

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

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you have any questions or comments regarding this letter, please contact David Lin, Senior Environmental Scientist (Specialist) at [David.Lin@wildlife.ca.gov](mailto:David.Lin@wildlife.ca.gov) or (562) 619-0509.

Sincerely,

DocuSigned by:  
  
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Victoria Tang signing for

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW  
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## References

- [CDFWa] California Department of Fish and Wildlife. 2023. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>.
- [CDFWb] California Department of Fish and Wildlife. 2023. Scientific Collecting Permit. Available from: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>.
- [CDFWc] California Department of Fish and Wildlife. 2023. Species of Special Concern. Available from: <https://wildlife.ca.gov/Conservation/SSC>.
- [CDFWd] California Department of Fish and Wildlife. 2023. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.
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### Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
	Mitigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party
<b>MM-BIO-1- Nesting Birds</b>	To avoid potential direct and indirect impacts to nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, project activities should avoid the general nesting season of February 1 through September 30. If this season cannot be avoided, then a pre-construction clearance survey should be conducted seven days prior to project activities to determine the presence/absence of any nesting bird species within a 500-foot radius of the proposed project work area including under the bridge deck and in vegetation within the proposed work area. If project activities are delayed or suspended for more than 7 days during the nesting season, new nest surveys should be conducted. If an active bird nest is found within the bridge deck, work would not be able to proceed until the nest is determined to be inactive (fledged or failed) by a qualified biologist. If an active bird nest is found within portions of the survey area adjacent to the bridge, an avoidance buffer will be established around the nest, based on the species sensitivity to disturbance and proximity to impact areas. The buffer will remain in place as long as the nest is considered active, as determined by an on-site monitor. No encroachment into the buffer may occur within the consent of the on-site monitor, as long as a nest is still active.	Prior to and during Project activities	Los Angeles County Public Works (LACPW or County)
<b>MM-BIO-2- Bats</b>	The MND shall require Project activities that may occur near potential bat roosting habitat, a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows). These surveys shall identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition	Prior to and during Project activities	County



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	<p>technology shall be utilized to maximize detection of bats. A discussion of survey results, including negative findings shall be provided to the County. 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 submitted to the County prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.</p>		
<b>MM-BIO-3-Bats</b>	<p>If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30).</p>	Prior to and during Project activities	County
<b>REC-1- Impacts to Streams</b>	<p>To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 <i>et seq.</i> and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.</p> <p>Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSA Agreement may include further erosion and pollution control measures. To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on- or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.</p>	Prior to Project activities	County
<b>REC-2- Scientific Collecting Permits</b>	<p>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 &amp; 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</p>	Prior to Project activities	County

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	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 <a href="#">Scientific Collection Permits webpage</a> for information (CDFW 2023b). Pursuant to the California Code of Regulations, title 14, section 650, the County or its qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with construction.		
<b>REC-3-Rodenticides</b>	CDFW recommends the Project prevent the use of second-generation anticoagulant rodenticides on site and over the life of the Project	During and after Project activities	County
<b>REC-3-Data</b>	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity Database) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting <a href="#">CNDDB Field Survey Forms</a> (CDFW 2023d). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The County should provide CDFW with confirmation of data submittal.	Prior to and after Project activities	County