



STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newson, Governor
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

South Coast Region
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June 8, 2023

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Subject: Bowtie Parcel Demonstration Wetland Project, Mitigated Negative Declaration, SCH #2023040639, California Department of Parks and Recreation, Los Angeles County

Dear Mr. Serna,

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) from the California Department of Parks and Recreation (CDPR) for the Bowtie Parcel Demonstration Wetland Project (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's 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; Pub. 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 (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

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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.*), CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The Project proposes to enhance habitat, improve water quality, and increase public access to open space and the Los Angeles (LA) River at the Bowtie parcel. The Project would redevelop and restore the northeastern section of the Bowtie parcel, approximately 3.2 acres, currently consisting of bare earth and some concrete debris to demonstration wetlands. The new habitat would include upland, riparian, and wetland habitat areas. Dry weather and some wet weather flows will be diverted from a storm drain, treated through a filtration system, and pumped into a wetland where there would be additional water quality improvements. A portion of the water would be used for irrigation, and the remaining enhanced water would be returned to the LA River. The Project would also include landscaping and amenities to convert the former brownfield site into habitat native to Southern California and a park space for public use.

Location: The Project is located in the City of Los Angeles, latitude 34°06'34.4"N and longitude 118°14'46.2"W, at Assessor's Parcel Number 5442-02-914. The Project site is bounded by the LA River to the southwest, Kerr Street to the north, and the Union Pacific railroad to the east.

Comments and Recommendations

Based on our review of the Project's CEQA document, CDFW offers the comments and recommendations below to assist CDPR 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 (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

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Specific Comments

Comment #1: Impacts on Least Bell's Vireo (*Vireo bellii pusillus*)

Issue: The Project may impact least Bell's vireo (*Vireo bellii pusillus*), an Endangered Species Act (ESA) and CESA-listed species.

Specific impacts: The Project occurring during the least Bell's vireo nesting season could adversely affect breeding behavior of least Bell's vireo. Elevated noise and ground disturbance could result in least Bell's vireo abandoning nesting territory. In addition, elevated noise could result in the incidental loss of nests, fertile eggs, or nestlings.

Why impacts would occur: A review of the California Natural Diversity Database (CNDDDB) (CDFW 2023a) and E-bird (E-bird 2023) shows that least Bell's vireo has potential to occur around the Project site. CNDDDB shows suitable habitat in the form of low, dense thickets of willow and shrub occurring within two miles of the Project site. E-Bird shows occurrences adjacent to the Project site at the Rio de Los Angeles State Park within a mile of the Project site.

The MND does not provide a discussion of the Project's potential impacts on least Bell's vireo if Project activities occur during the nesting season. Project activities include excavation with heavy machinery such as graders, loaders, and excavators. These activities could result in elevated levels of noise. Substantial noise may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55-60 dB (Barber et al. 2009). The Project could adversely affect least Bell's vireo by disrupting foraging or breeding behavior or by causing adults to abandon nests. Disruptions to breeding behavior could include a temporary reduction breeding activity if least Bell's vireos avoid noisy areas. Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). Project activities occurring during the breeding season of least Bell's vireo could result in the incidental loss of fertile eggs, nestlings, or nest abandonment. Least Bell's vireo could be forced from their territory into adjacent habitat that may be less suitable where they would be at risk of predation, starvation, or other injury.

The MND does not propose any specific mitigation measures for least Bell's vireo or protocol surveys for the species. Without any avoidance, minimization, or mitigation measures, the Project may result in significant impacts to least Bell's vireo.

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Evidence impact would be significant: Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, take under the ESA is more broadly defined than take under CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The MND has yet to provide measures to mitigate for the Project's potential impact on least Bell's vireo. Accordingly, the Project may have a substantial adverse 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 the CDFW or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: Appropriate take authorization from CDFW under CESA may include a Restoration Management Permit (RMP), Incidental Take Permit (ITP), or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (a), (b), and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an RMP or ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation monitoring and reporting program that will meet the requirements of an RMP or ITP. It is important that the take proposed to be authorized by CDFW's RMP or ITP be described in detail in the Project's CEQA document. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an RMP or ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.

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Mitigation Measure #1: CDPR should fully avoid impacts to least Bell's vireo by working outside of the least Bell's vireo nesting season for the duration of the Project. No ground-disturbing activities, including staging, as well as disturbances to native and nonnative vegetation should occur during the least Bell's vireo breeding season from March 15 through July 15 to avoid take of least Bell's vireo birds, nestlings, or their eggs.

Mitigation Measure #2: If construction activities must occur during the least Bell's vireo breeding season during the Project, one year prior to Project-related ground-disturbing activities and vegetation removal, CDPR should perform protocol surveys for least Bell's vireo where suitable habitat occurs within 500 feet of the Project site. CDPR should also establish and map the territory boundaries of least Bell's vireo within 500 feet of the Project direct footprint. Surveys should adhere to the USFWS 2001 [Least Bell's Vireo Survey Guidelines](#) (USFWS 2001). Per protocol guidelines, a final survey report (including negative findings) should be provided to USFWS and CDFW within 45 calendar days following the completion of the survey effort.

Mitigation Measure #3: If least Bell's vireo is present, CDPR should prepare an Avoidance Plan in coordination with USFWS and CDFW. The Avoidance Plan should include territory boundaries, noise level monitoring and restrictions during the breeding season, surveys by a qualified biologist, and Project construction lighting requirements. The Avoidance Plan should include Best Management Practices for Project lighting consistent with National Park Service lighting guidance – [Outdoor Lighting in National Parks: Lessons Learned and Best Practices](#). An Avoidance Plan should be prepared prior to any ground-disturbing activities and vegetation removal.

Mitigation Measure #4: If least Bell's vireo is not present, CDPR should commence work, and qualified biologists should survey weekly for least Bell's vireo, so as to be aware of use of nearby or adjacent habitat. If least Bell's vireo is found to have come near to the Project site, CDPR should stop work and consult with USFWS and CDFW. Protocol surveys should be conducted each year prior to implementation to ensure no least Bell's vireo presence.

Mitigation Measure #5: If impacts to least Bell's vireo cannot be avoided, CDPR should consult CDFW and USFWS to obtain take authorization. Appropriate take authorization should be obtained from CDFW and USFWS prior to any ground-disturbing activities and vegetation removal.

Comment #2: Impacts on Streams

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Issue: The Project may impact streams.

Specific impacts: The Project may impact streams during grading and earthwork. In addition, the Project may alter the conveyance of runoff and sheet flow by installing new paved areas and permanent structures to capture runoff.

Why impacts would occur: According to page 114 in the section 3.10 Hydrology and Water Quality, "Construction of the Project would involve earth disturbing activities such as grading and excavations that have the potential during precipitation events to increase erosion or introduce petroleum hydrocarbons and/or lead from impacted shallow soils into the storm drain system or Los Angeles River...". The Project could impact streams temporarily during Project construction and permanently after the Project is completed.

Temporary impacts on streams could occur during Project construction. The Project would include substantial grading and balancing of fill on site. This could result in soil erosion and earth movement. As a result, the Project could deposit materials such as sediment and fine particles into a stream. Therefore, the Project could impact streams by depositing, permitting to pass into, or placing where it can pass into the waterway any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment.

Permanent impacts on streams could occur after the Project is completed by altering how runoff is captured and conveyed through the Project site. On page 115 the document specifies that "...stormwater that falls on the Project site would sheet flow into the wetland for treatment and use." The Project would install features that would modify how water is captured and conveyed across the Project site compared to baseline (i.e., no Project).

Evidence impact 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 natural 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;

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- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources.

The Project may impact streams both during Project construction and for the Project's lifetime. The MND does not provide measures to mitigate for potentially significant impacts on streams. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #2: CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq.* and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

Mitigation Measure #6: CDPR should notify CDFW pursuant to Fish and Game Code 1602. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2023b).

Mitigation Measure #7: The Project Applicant's notification to CDFW should provide the following information at minimum:

- 1) A stream delineation in accordance with the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979);
- 2) Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by

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the Project. Plant community names should be provided based on vegetation association and/or alliance per the [Manual of California Vegetation](#), second edition (Sawyer et al. 2008);

- 3) A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and
- 4) A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. Additionally, the hydrological evaluation should assess a sufficient range of storm events (e.g., 100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate water and sediment transport under pre-Project and post-Project conditions.

Additional Recommendations

Recommendation #3: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (e.g., CNDDDB) which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023c).

Recommendation #4: CDFW recommends CDPR revise update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist CDPR in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), enforceable through permit conditions, agreements, or other legally-binding instruments [CEQA Guidelines, § 15126.4(a)(2)], and clear 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). CDPR 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 CDPR with a summary of our suggested mitigation measures and recommendations in the form of an

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attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

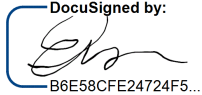
Filing Fees

The Project, as proposed, would 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 and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required 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 CDPR in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the CDPR has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Christian Romberger, Senior Environmental Scientist (Specialist), at (562) 292-6365 or by email at christian.romberger@wildlife.ca.gov.

Sincerely,

DocuSigned by:

B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I

ec: CDFW

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State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

- Barber, J. R., K. R. Crooks, and K. M. Fristrup. 2009. The costs of chronic noise exposure for terrestrial organisms. *Trends in Ecology and Evolution* 25:180–189.
- [CDFWa] California Department of Fish and Wildlife. 2022. California Natural Diversity Database (CNDDDB) Available from: <https://wildlife.ca.gov/Data/BIOS>
- [CDFWb] California Department of Fish and Wildlife. 2023. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- [CDFWc] California Department of Fish and Wildlife. (2022). Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
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- [E-bird] E-Bird. 2023. Least Bell's Vireo Observations. Available from <https://ebird.org>
- Francis, C. D., C. P. Ortega, and A. Cruz. 2009. Noise Pollution Changes Avian Communities and Species Interactions. *Current Biology* 19, 16:1415-1419.
- Kight, C. R., and J. P. Swaddle. 2011. How and why environmental noise impacts animals: an integrative, mechanistic review. *Ecology Letters* 14: 1052-1061.
- Sawyer, J. O., T. Keeler-Wolf, and J. Evens. 2008 A manual of California vegetation, second edition. California Native Plant Society.

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into the Project's environmental document.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-1-Discuss the Projects potential impact to least Bell's vireo	CDPR shall obtain appropriate take authorization from CDFW under CESA which may include a Restoration Management Permit (RMP), Incidental Take Permit (ITP), or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (a), (b), and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an RMP or ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation monitoring and reporting program that will meet the requirements of an RMP or ITP. It is important that the take proposed to be authorized by CDFW's RMP or ITP be described in detail in the Project's CEQA document. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an RMP or ITP. However, it is worth	Prior to finalizing CEQA document	California Department of Parks and Recreation

	noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.		
REC-2-Fish and Game Code section 1602	To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 <i>et seq.</i> and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.	Prior to finalizing CEQA document	California Department of Parks and Recreation
REC-3- Submitting Data for Sensitive and Special Status Species and Natural Communities	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms. Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program.	Prior to finalizing CEQA document	California Department of Parks and Recreation
REC-4- Mitigation and Monitoring Reporting Plan	CDPR shall condition the environmental document to include mitigation measures recommended in CDFW's comment letter	Prior to finalizing CEQA document	California Department of Parks and Recreation
MM-BIO-1- Impacts on	CDPR shall fully avoid impacts to least Bell's vireo by working outside of the least Bell's vireo nesting season	Prior to any Project-	California Department of

least Bell's Vireo – Avoid Impacts	for the duration of the Project. No ground-disturbing activities, including staging, as well as disturbances to native and nonnative vegetation should occur during the least Bell's vireo breeding season from March 15 through September 15 to avoid take of least Bell's vireo birds, nestlings, or their eggs.	related ground disturbing activities	Parks and Recreation
MM-BIO-2- Impacts on least Bell's vireo – Protocol Surveys	If construction activities must occur during the least Bell's vireo breeding season during the Project, one year prior to Project-related ground-disturbing activities and vegetation removal, CDPR shall perform protocol surveys for least Bell's vireo where suitable habitat occurs within 500 feet of the Project site. CDPR should also establish and map the territory boundaries of least Bell's vireo within 500 feet of the Project direct footprint. Surveys should adhere to the USFWS 2001 Least Bell's Vireo Survey Guidelines (USFWS 2001). Per protocol guidelines, a final survey report (including negative findings) should be provided to USFWS and CDFW within 45 calendar days following the completion of the survey effort.	Prior to any Project-related ground disturbing activities	California Department of Parks and Recreation
MM-BIO-3- Impacts on least Bell's vireo – Avoidance Plan	If least Bell's vireo is present, CDPR shall prepare an Avoidance Plan in coordination with USFWS and CDFW. The Avoidance Plan should include territory boundaries, noise level monitoring and restrictions during the breeding season, surveys by a qualified biologist, and Project construction lighting requirements. The Avoidance Plan should include Best Management Practices for Project lighting consistent with National Park Service lighting guidance – Outdoor Lighting in National Parks: Lessons Learned and Best Practices. An Avoidance Plan should be prepared prior to any	Prior to any Project-related ground disturbing activities	California Department of Parks and Recreation

	ground-disturbing activities and vegetation removal.		
MM-BIO-4- Impacts to least Bell's vireo – Avoidance plan	If least Bell's vireo is not present, CDPR should commence work, and qualified biologists should survey weekly for least Bell's vireo, so as to be aware of use of nearby or adjacent habitat. If least Bell's vireo is found to have come near to the project site, CDPR shall stop work and consult with USFWS and CDFW. Protocol Surveys shall be conducted each year prior to implementation to ensure no least Bell's vireo presence.	Prior to any Project-related ground disturbing activities	California Department of Parks and Recreation
MM-BIO-5- Impacts on least Bell's vireo – Take Authorization	If impacts to least Bell's vireo cannot be avoided, CDPR shall consult CDFW and USFWS to obtain take authorization. Appropriate take authorization should be obtained from CDFW and USFWS prior to any ground-disturbing activities and vegetation removal.	Prior to any Project-related ground disturbing activities	California Department of Parks and Recreation
MM-BIO-6-Fish and Game Code Section 1602 – Notify CDFW	CDPR shall notify CDFW pursuant to Fish and Game Code 1602. Please visit CDFW's Lake and Streambed Alteration Program webpage for more information (CDFW 2023).	Prior to finalizing CEQA document	California Department of Parks and Recreation
MM-BIO-7-Fish and Game Code Section 1602 – Notify CDFW	The Project Applicant's notification to CDFW shall provide the following information at minimum: 1) A stream delineation in accordance with the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979); 2) Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. Plant community names should be provided based on vegetation association and/or alliance per	Prior to finalizing CEQA document	California Department of Parks and Recreation

	<p>the Manual of California Vegetation, second edition (Sawyer et al. 2009);</p> <p>3) A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and</p> <p>4) A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. Additionally, the hydrological evaluation should assess a sufficient range of storm events (e.g., 100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate water and sediment transport under pre-Project and post-Project conditions.</p>		
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