



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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San Diego, CA 92123
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 24, 2025

Aiden Leong
Los Angeles Department of Water and Power
111 North Hope Street
Room 1044
Los Angeles, CA 90012
Aiden.Leong@ladwp.com

Subject: Supplemental Environmental Impact Report for the Los Angeles Groundwater Replenishment Project, SCH No. 2013091023, Los Angeles County, CA

Dear Aiden Leong:

The California Department of Fish and Wildlife (CDFW) reviewed the Supplemental Environmental Impact Report (SEIR) from the Los Angeles Department of Water and Power (LADWP) for the Los Angeles Groundwater Replenishment Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding activities involved in the Project that may affect California fish and wildlife.

CDFW 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, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (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 (Fish & G. Code, § 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 fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

Proponent: LADWP

Objective: The objective of the Project is to increase the volume of recycled purified water effluent for public consumption. To accomplish this, LADWP is proposing to install

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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approximately 90 linear feet of buried 16-inch diameter stainless steel pipeline to capture and redirect recycled water that flows from the Donald C. Tillman Water Reclamation Plant (DCTWRP) into the Japanese Garden Lake, back to the DCTWRP. This would allow LADWP to cease discharging water to the Los Angeles River (LA River) from the Japanese Garden Lake. Based on four years of water year data (2018-2022), the average flow reduction into the LA River is estimated to be approximately 3.9 million gallons a day (MGD).

Location: The Project is located between Victory Boulevard and Woodley Avenue, in Los Angeles, CA and is adjacent to the LA River. The LA River encompasses an 834 square-mile watershed.

Biological Setting: The biological setting of the Project, for the purposes of this letter, is focused on the biological resources that could be affected by the discharge flow reduction. These resources are located within the LA River downstream of the existing Japanese Garden discharge point. The LA River is flanked by the urbanized environment of the cities of Los Angeles, Burbank, Glendale, and Long Beach. The LA River flows from its headwaters in the Santa Susana Mountains eastward to the northern area of Griffith Park. Then, the LA River turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach where the LA River drains into the Pacific Ocean.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist LADWP in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENT # 1: Water Diversion on Fish and Wildlife Resources

Issue: On average, the Project would result in an average decrease of approximately 3.9 MGD into the LA River downstream of the Japanese Garden discharge point.

Specific impact: The reduction of flows and water availability in the LA River may have significant effects and/or changes on the hydrologic regime within the immediate area and downstream of the Project location. Significant impacts to biological resources could occur, especially during dry years and/or droughts.

Why impact would occur: The SEIR does not provide sufficient analysis of the Project's potential biological impacts to allow CDFW to determine the Project's significance or need for mitigation.

Biological Resources: The LA River encompasses both concrete-lined and soft-bottom channel segments that support biological resources. Where the LA River overtops the concrete-lined channel, the resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae

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provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. The LA River also provides habitat for hundreds of bird species, making these areas birding hotspots. Least Bell's vireo (*Vireo bellii pusillus*), an Endangered Species Act and California Endangered Species Act (CESA)-listed endangered species, has been documented around the Glendale Narrows area. Least Bell's vireo depends on willow (*Salix* genus) riparian habitat. The middle reach of the LA River, specifically the Glendale Narrows, also support native fish species, including southern California steelhead (*Oncorhynchus mykiss*; steelhead), a CESA-listed endangered species, (*Entosphenus tridentatus*), a California Species of Special Concern.

Evidence impact may be significant: Diverting water from the LA River may impact downstream biological resources, especially during relatively dry years and periods of drought. Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures are likely to result in continual and substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on sensitive and/or special-status species.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends LADWP conduct biological surveys that focus on identifying special status species presence and abundance to establish baseline conditions for the Adaptive Management Plan (AMP; refer to Mitigation Measure #4). Focused species-specific surveys should consider seasonal variations and be conducted at the appropriate times of the year and times of the day when sensitive species are active or otherwise identifiable. CDFW also recommends that avian surveys be conducted by a qualified ornithologist prior to adoption of the final environmental document to identify avian species that are present with the Project impact area. The Project should adhere to the Least Bell's Vireo Survey Guidelines (USFWS 2001). Per protocol guidelines, a final survey report (including negative findings) should be provided to U.S. Fish and Wildlife Service (USFWS) and CDFW within 45 calendar days following the completion of the survey effort. A final survey report should be submitted to USFWS and CDFW prior to any Project related ground disturbing activities and vegetation removal.

Mitigation Measure #2: CDFW recommends LADWP provide additional analysis and evaluation of potential impacts on biological resources as part of the final environmental document to establish baseline conditions for the AMP (refer to Mitigation Measure #4). A quantitative analysis comparing the existing and proposed hydrograph during a) the wet season (November through March); b) the dry season (April through October); and c) above-average and below-average water years (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). LADWP should clearly define what it would consider an above-average or below-average rainfall year.

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Mitigation Measure #3: CDFW recommends phasing the discharge reduction into two or three phases over a five- to ten-year period. Phased discharge reductions will provide vegetation an opportunity to gradually adapt to the reductions. A phased reduction will also provide birds and other species time to adapt to the reduction of dry-season flow in the LA River.

Mitigation Measure #4: CDFW recommends LADWP develop an AMP that would direct LADWP to reduce or suspend water diversion if at any point the Project may impact biological resources downstream exceeding a defined threshold/trigger and to re-release pre-Project volumes of water (3.9 MGD) back into the LA River. The AMP will use the data in Mitigation Measure #1, Mitigation Measure #2, and Mitigation Measure #6 to establish baseline conditions and appropriate triggers to re-release wastewater discharges when and/or if necessary. The implementation of the AMP will ensure that quantity and quality of riparian and wetland habitat, currently supported by the upstream wastewater discharges, is maintained at baseline levels.

Mitigation Measure #5: CDFW recommends LADWP commit to utilizing the best available science to identify how the Project will impact the ecologically significant flows of the LA River. The California Environmental Flows Framework (CEFF) utilizes historic flow records and site-specific instream habitat analysis to quantify ecologically relevant flow characteristics (flow magnitude, frequency, duration, timing, and rate of change at discrete stream reaches). The CEFF process is currently being applied to the LA River. CDFW recommends LADWP adopt the CEFF process to inform a phased discharge operation plan and AMP.

Recommendation #1: CDFW recommends the following data and information sources:

- Stream gage data available from Los Angeles County Public Works (LACPW 2024);
- Los Angeles River Master Plan (Geosyntec et al. 2020);
- Los Angeles River California Environmental Flows (CEFF) Section A Analysis from the Pacific Ocean to the Sepulveda Basin (Stillwater Sciences 2023); and,
- Los Angeles River CEFF Study (MRCA 2025).

COMMENT # 2: HEC-RAS Hydraulic Modeling

Issue: LADWP has not provided the data source or details used to inform the HEC-RAS model.

Specific impacts: The HEC-RAS Hydraulic modeling identifies the modeling results associated with the differences in flow, water elevation, velocity, depth and top width,

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but it does not identify differences in the linear feet of the LA River or other details of what data was used to inform the HEC-RAS model.

Why impacts would occur: The SEIR does not provide sufficient data or flow analysis to allow CDFW to determine the Project's effects on ecologically significant flows.

Evidence impacts would be significant: Diverting water from the LA River may impact biological resources downstream, especially during the dry season and/or periods of drought. Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species are likely to result in continual and substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on sensitive and/or special-status species.

Evidence impacts would be significant: Diverting water from the LA River may impact biological resources downstream, especially during the dry season and/or periods of drought. Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species are likely to result in continual and substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on sensitive and/or special-status species.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure # 6: CDFW recommends LADWP provide the data source material used to inform the HEC-RAS model in the final environmental document. CDFW requests a map that includes modeled/predicted fluctuations in channel reduction and hydraulics that overlays plant communities and habitats for sensitive bird and wildlife species. This data is essential to inform the AMP (refer to Mitigation Measure #4) and to understand the hydrology underlying baseline habitat conditions.

COMMENT # 3: Cumulative Impacts

Issue: The Project does not consider downstream impacts to reasonably foreseeable restoration projects within the LA River watershed. Some of the planned and/or ongoing restoration projects along the LA River can be found in the link below:
<https://larivermasterplan.org/goals/support-healthy-connected-ecosystems/>.

Specific impact: The SEIR does not analyze potential downstream impacts to reasonably foreseeable restoration projects within the LA River watershed (see Recommendation #2); some of which support steelhead passage to allow both juvenile and adult steelhead to migrate between the tributaries of the LA River and the Pacific Ocean. The Project's point of discharge is upstream of habitat for fish and wildlife. The

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Project has the potential to substantially alter the hydrologic flows of the LA River, and may impact downstream restoration projects that depend on instream flows.

Why impact would occur: The SEIR does not provide sufficient analysis of the Project's potential cumulative impacts to allow CDFW to determine the Project's significance on reasonably foreseeable restoration projects.

Evidence impact would be significant: The Project may have a significant effect on the environment if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). When assessing whether a cumulative effect requires a (Supplemental) Environmental Impact Report, LADWP "shall consider whether the cumulative impact is significant and whether the effects of the Project are cumulatively considerable" (CEQA Guidelines, § 15064(h)(1)). When using a threshold of significance, the LADWP should briefly explain how compliance with the threshold means that the Project's impacts are less than significant. A threshold of significance is an identifiable quantitative, qualitative, or performance level of a particular environmental effect (CEQA Guidelines, § 15064.7). Compliance with the threshold does not relieve the LADWP's obligation to consider substantial evidence indicating that the Project's environmental effects may still be significant (CEQA Guidelines, § 15064(b)(2)). A conclusion about whether cumulative impact is significant may be insufficient without an analysis describing the analytic route that LADWP traveled from evidence to action/determination.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #7: CDFW recommends LADWP provide additional analysis and evaluation of potential cumulative impacts on on-going habitat recovery and restoration efforts and reasonably foreseeable future projects as part of the final environmental document.

Recommendation #2: CDFW recommends the LADWP consider the cumulative downstream impacts on the following reasonably foreseeable projects:

- Los Angeles River Ecosystem Restoration and Recreation Reach 8A Project (City of LA 2024); and,
- LA River Fish Passage and Habitat Structures Design Project (Stillwater Sciences 2022).

ADDITIONAL COMMENTS

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity

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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 CNDDDB Field Survey Forms (CDFW 2020b). LADWP should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. LADWP should provide CDFW with confirmation of data submittal.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency 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 a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

California Water Code Section 1211. CDFW looks forward to providing recommendations to the State Water Resources Control Board for the water right order during the wastewater change petition process for this Project.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a 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 and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)² provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)³.

LADWP should ensure data collected for the preparation of the SEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the

² <https://wildlife.ca.gov/Data/CNDDDB>

³ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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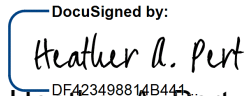
Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

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

Questions regarding this letter or further coordination should be directed to Mary Ngo⁴, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:

DF423498814B444
Heather A. Pert
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Heather A. Pert, Environmental Program Manager
Baron Barrera, Senior Environmental Scientist (Supervisory)
Mayra Molina, Senior Environmental Scientist (Specialist)
Christian Romberger, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

State Water Resources Control Board
Patricia Fernandez, Water Resource Control Engineer

National Marine Fisheries Service
Brittany Struck, Fish Biologist

U.S. Fish and Wildlife Service

⁴ Phone: 562-477-0743; Email: Mary.Ngo@wildlife.ca.gov

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Christine Medak, Fish and Wildlife Biologist

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

[City of LA] Los Angeles City. 2024. Los Angeles River Ecosystem Restoration and Recreation Reach 8A Project. Available at: <https://ceqanet.opr.ca.gov/2024020386>

Geosyntec, OLIN, and Gehry Partners, LLC. 2020. LA River Master Plan. Available from: https://www.larivermasterplan.org/larmp_document

[LACPW] Los Angeles County Public Works. 2024. Index of Stream Gaging Stations. Available from: <https://www.ladpw.org/wrd/runoff/index.cfm>

[MRCA] Mountains Recreation Conservation Authority. 2025. Los Angeles River CEFF Study Available from: <https://mrca.ca.gov/los-angeles-river/ceff-study/>

Stillwater Sciences. 2023. Los Angeles River California Environmental Flows (CEFF) Section A Analysis from the Pacific Ocean to the Sepulveda Basin. Available at: [Stillwater-Sciences-2023-LA-River-CEFF-Section-A-Tech-Memo-FINAL.pdf](#)

Stillwater Sciences. 2022. LA River Fish Passage and Habitat Structures Design Project Available at: https://files.ceqanet.opr.ca.gov/295729-1/attachment/PLgHR6sgUZtqpxns56JsHpCaFG8iD6U6k9BbJ2MUKQKk_bRZUKBTUFGPWpDx8IK2Uhw8RZPrNi0SzbPa0

[USFWS] U.S. Fish and Wildlife Service. 2001. Least Bell's Vireo Survey Guidelines Available at: <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-least-bells-vireo.pdf>

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #1: CDFW recommends LADWP conduct biological surveys that focus on identifying special status species presence and abundance to establish baseline conditions for the Adaptive Management Plan (AMP; refer to Mitigation Measure #4). Focused species-specific surveys should consider seasonal variations and be conducted at the appropriate times of the year and times of the day when sensitive species are active or otherwise identifiable. CDFW also recommends that avian surveys be conducted by a qualified ornithologist prior to adoption of the final environmental document to identify avian species that are present with the Project impact area. The Project should adhere to the Least Bell’s Vireo Survey Guidelines (USFWS 2001). Per protocol guidelines, a final survey report (including negative findings) should be provided to U.S. Fish and Wildlife Service (USFWS) and CDFW within 45 calendar days following the completion of the survey effort. A final survey report should be submitted to USFWS and CDFW prior to any Project related ground disturbing activities and vegetation removal.</p>	<p>Prior to Project Activities</p>	<p>Designated Biologist</p>
<p>Mitigation Measure #2: CDFW recommends LADWP provide additional analysis and evaluation of potential impacts on biological resources as part of the final environmental document to establish baseline conditions for the AMP (refer to Mitigation Measure #4). A quantitative analysis comparing the existing and proposed hydrograph during a) the wet season (November through March); b) the dry season (April through October); and c) above-average and below-average water years (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year).</p>	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
LADWP should clearly define what it would consider an above-average or below-average rainfall year.		
<p>Mitigation Measure #3: CDFW recommends phasing the discharge reduction into two or three phases over a five- to ten-year period. Phased discharge reductions will provide vegetation an opportunity to gradually adapt to the reductions. A phased reduction will also provide birds and other species time to adapt to the reduction of dry-season flow in the LA River.</p>	<p>Prior to submitting wastewater change petition and prior to adoption of final environmental document</p>	<p>Project Proponent</p>
<p>Mitigation Measure #4: CDFW recommends LADWP develop an AMP that would direct LADWP to reduce or suspend water diversion if at any point the Project may impact biological resources downstream exceeding a defined threshold/trigger and to re-release pre-Project volumes of water (3.9 MGD) back into the LA River. The AMP will use the data in Mitigation Measure #1, Mitigation Measure #2, and Mitigation Measure #6 to establish baseline conditions and appropriate triggers to re-release wastewater discharges when and/or if necessary. The implementation of the AMP will ensure that quantity and quality of riparian and wetland habitat, currently supported by the upstream wastewater discharges, is maintained at baseline levels.</p>	<p>Prior to submitting wastewater change petition and prior to adoption of final environmental document</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #5: CDFW recommends LADWP commit to utilizing the best available science to identify how the Project will impact the ecologically significant flows of the LA River. The California Environmental Flows Framework (CEFF) utilizes historic flow records and site-specific instream habitat analysis to quantify ecologically relevant flow characteristics (flow magnitude, frequency, duration, timing, and rate of change at discrete stream reaches). The CEFF process is currently being applied to the LA River. CDFW recommends LADWP adopt the CEFF process to inform a phased discharge operation plan and AMP.</p>	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>
<p>Recommendation #1: CDFW recommends the following data and information sources:</p> <ul style="list-style-type: none"> • Stream gage data available from Los Angeles County Public Works (LACPW 2024); • Los Angeles River Master Plan (Geosyntec et al. 2020); • Los Angeles River California Environmental Flows (CEFF) Section A Analysis from the Pacific Ocean to the Sepulveda Basin (Stillwater Sciences 2023); and, • Los Angeles River CEFF Study (MRCA 2025). 	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>

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Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #6: CDFW recommends LADWP provide the data source material used to inform the HEC-RAS model in the final environmental document. CDFW requests a map that includes modeled/predicted fluctuations in channel reduction and hydraulics that overlays plant communities and habitats for sensitive bird and wildlife species. This data is essential to inform the AMP (refer to Mitigation Measure #4) and to understand the hydrology underlying baseline habitat conditions.</p>	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>
<p>Mitigation Measure #7: CDFW recommends LADWP provide additional analysis and evaluation of potential cumulative impacts on on-going habitat recovery and restoration efforts and reasonably foreseeable future projects as part of the final environmental document.</p>	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>
<p>Recommendation #2: CDFW recommends the LADWP consider the cumulative downstream impacts on the following reasonably foreseeable projects:</p> <ul style="list-style-type: none"> • Los Angeles River Ecosystem Restoration and Recreation Reach 8A Project (City of LA 2024); and, • LA River Fish Passage and Habitat Structures Design Project (Stillwater Sciences 2022). 	<p>Prior to adoption of final environmental document</p>	<p>Project Proponent</p>