



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**VALERIE TERMINI, Acting Director**



January 26, 2026

Mitali Gupta  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza Mail Stop 99-22-32  
Los Angeles, CA 90012  
[guptam@metro.net](mailto:guptam@metro.net)

**Subject: Draft Environmental Impact Report for the LA River Path, SCH No. 2019100443, Los Angeles County, CA**

Dear Mitali Gupta:

The California Department of Fish and Wildlife (CDFW) reviewed Draft Environmental Impact Report (DEIR) from the Los Angeles County Metropolitan Transportation Authority for the LA River Path Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

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, CDFW appreciates 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 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.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration

<sup>1</sup> 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.

Mitali Gupta  
 Los Angeles County Metropolitan Transportation Authority  
 January 26, 2026  
 Page 2 of 13

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<sup>2</sup> of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** Los Angeles County Metropolitan Transportation Authority

**Objective:** The Project would create a pedestrian and bicycling path regionally located in the center of Los Angeles County, California. The Project would close the remaining 8-mile gap between the existing Los Angeles River Greenway Trail and the existing LA River Trail along the LA River. Thus, allowing for a continuous 32-mile path extending from Griffith Park through Downtown Los Angeles to the City of Vernon and connecting to Long Beach along the LA River.

**Location:** The Project follows an 8-mile stretch along the LA River from Griffith Park to the City of Vernon.

**Biological Setting:** The Project site is in an urbanized area within the cities of Los Angeles, Vernon, Bell, and Maywood, as well as the unincorporated Bandini Islands community. The land consists of predominantly industrial and commercial uses and the LA River channel. The Arroyo Seco meets the LA River channel just south of where State Route 110 intersects Interstate 5. A few parks and open space areas are located in the Project site, most of which are toward the northern portion. The bed and banks of the LA River are nearly completely concrete-lined through the Project site, with a small section that includes metal sheet piling walls. The Project site contains small sections of habitat, including but not limited to California walnut, coast live oak woodland, upland, and open water.

A desktop review and field survey in 2021 determined potential for the following species: least Bell’s vireo (*Vireo bellii pusillus*; Endangered Species Act (ESA) – Endangered, California Endangered Species Act (CESA) – Endangered), pallid bat (*Antrozous pallidus*; Species of Special Concern (SSC)), western mastiff bat (*Eumops perotis californicus*; SSC), western yellow bat (*Lasiurus xanthinus*; SSC), and big free-tailed bat (*Nyctinomops macrotis*; SSC). The DEIR includes measures regarding worker education, bat roosts, and nesting birds.

---

<sup>2</sup> “Take” is defined in Section 86 of the Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

Mitali Gupta  
 Los Angeles County Metropolitan Transportation Authority  
 January 26, 2026  
 Page 3 of 13

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Los Angeles County Metropolitan Transportation Authority in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

### COMMENT # 1: Least Bell's Vireo

**Issue:** The Project could impact least bell's vireo, a CESA-listed and federal ESA-listed species.

**Specific impact:** The proposed Project may impact least Bell's vireo by operating equipment, human disturbance, and grading activities within the Project site.

**Why impact would occur:** The DEIR states that least Bell's vireo is not likely to be found in the Project site due to lack of recent reported sightings and lack of riparian habitat. Additionally, the DEIR states that least Bell's vireo "nest exclusively in riparian habitat." CDFW disagrees with the DEIR, as least Bell's vireo has been documented nesting in degraded riparian areas and even non-riparian areas<sup>3</sup> (Kus and Miner 1989). Construction during the breeding season of nesting birds could potentially result in the incidental loss of breeding success or otherwise lead to nest abandonment. Noise from construction activities, generators, and heavy equipment may disrupt vireo mating calls or songs, which could impact reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009), and songbird abundance and density was significantly reduced in areas with high levels of noise (Bayne et al. 2008). Additionally, noise exceeding 70 dB(A) may affect feather and body growth of young birds (Kleist et al. 2018). The DEIR does acknowledge the historical occurrence of least Bell's vireo within and around the Project site but does not include avoidance and minimization measures for least Bell's vireo, such as updated protocol level surveys or compensatory mitigation for known least Bell's vireo occurrences. Without updated protocol level surveys, the Project may result in missed detection of the species and adverse impacts. Adverse impacts that may occur to least Bell's vireo include but are not limited to direct injury, direct mortality by heavy machinery, or entrapment. CDFW appreciates the incorporation of Mitigation Measure BIO-3 regarding nesting season, but impacts could still be significant without appropriate surveys.

**Evidence impact would be significant:** There are only a few populations and breeding pairs of least Bell's vireo remaining in Los Angeles County. Project construction and activities resulting in loss of breeding pairs or nestlings or habitat supporting least Bell's vireo may result in the Project potentially causing a wildlife population to drop below self-sustaining levels; threatening to eliminate an animal

---

<sup>3</sup> [https://www.fs.usda.gov/psw/publications/documents/psw\\_gtr110/psw\\_gtr110\\_f\\_kus.pdf](https://www.fs.usda.gov/psw/publications/documents/psw_gtr110/psw_gtr110_f_kus.pdf)

Mitali Gupta  
Los Angeles County Metropolitan Transportation Authority  
January 26, 2026  
Page 4 of 13

community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065). Accordingly, unless the City provides alternatives or mitigation measures that would substantially lessen or avoid impacts, impacts on least Bell's vireo may require a mandatory finding of significance (CEQA Guidelines, § 15065).

CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Inadequate avoidance, minimization, and mitigation measures for impacts on the least Bell's vireo will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a wildlife species identified as special status by CDFW and USFWS.

As to CESA, 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). 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.

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

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

**Mitigation Measure #1: Least Bell's Vireo Surveys** - The Project proponent shall retain a qualified biologist to conduct updated protocol level surveys for least Bell's vireo. The qualified biologist shall conduct surveys according to the United States Fish and Wildlife Service's [Least Bell's Vireo Survey Guidelines](#)<sup>4</sup> (USFWS 2001). Per protocol, all potential least Bell's vireo habitat shall be surveyed at least eight times during the period from April 10 through July 31. CDFW and USFWS shall be notified of survey findings, including negative findings, within 45 calendar days following the completion of protocol-level surveys.

**Mitigation Measure #2: Incidental Take Permit** - If the Project would cause take of the CESA-listed species, the Project proponent shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization before any ground disturbance or vegetation removal.

---

<sup>4</sup> <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-least-bells-vireo.pdf>

Mitali Gupta  
Los Angeles County Metropolitan Transportation Authority  
January 26, 2026  
Page 5 of 13

## **COMMENT # 2: Impacts on the LA River**

**Issue:** The Project will permanently impact streams.

**Specific impact:** The DEIR states the Project will permanently impact streams.

**Why impact would occur:** Project activities will permanently or temporarily impact streams, but the DEIR does not mention notifying per Fish and Game Code 1602. These activities may also cause deposition or debris and refuse in the area that may end up in the drainages. Project implementation may directly affect water quality downstream. Lastly, these actions may also result in changes to the stream, altering hydrologic and geomorphic processes that may impact plant and wildlife species.

**Evidence impact would be significant:** 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.

The Project may adversely affect the existing hydrology pattern of the Project site. This may occur through the alteration of flows in the stream, which absent specific mitigation, could result in substantial erosion or siltation on or off site of the Project. In addition, associated riparian plant communities are present downstream of the Project site. Accordingly, the Project may substantially adversely affect the existing stream pattern and geomorphologic processes of the Project site through the alteration of drainages on site.

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

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

**Mitigation Measure #3:** The Project applicant (or “entity”) must provide notification to CDFW pursuant to 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](https://wildlife.ca.gov/Conservation/LSA)<sup>5</sup> webpage for information about LSA Notification and online submittal through the [Environmental Permit Information Management System \(EPIMS\) Permitting Portal](https://epims.wildlife.ca.gov/index.do)<sup>6</sup>.

---

<sup>5</sup> <https://wildlife.ca.gov/Conservation/LSA>

<sup>6</sup> <https://epims.wildlife.ca.gov/index.do>

Mitali Gupta  
 Los Angeles County Metropolitan Transportation Authority  
 January 26, 2026  
 Page 6 of 13

**Mitigation Measure #4:** Best Management Practices (BMP) shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other products without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.

**Recommendation #1:** CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.

**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 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.

To compensate for any on- and off-site impacts to wetlands or 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.

## **ADDITIONAL COMMENTS**

**Injured or Dead Wildlife.** If any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the designated biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only

Mitali Gupta  
Los Angeles County Metropolitan Transportation Authority  
January 26, 2026  
Page 7 of 13

resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

**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).

## **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](https://wildlife.ca.gov/Data/CNDDDB)<sup>7</sup> 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](#)<sup>8</sup>.

The City of Walnut should ensure data collected for the preparation of the DEIR 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 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.)

---

<sup>7</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>8</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Mitali Gupta  
Los Angeles County Metropolitan Transportation Authority  
January 26, 2026  
Page 8 of 13

## CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist City of Walnut in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City of Walnut 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 Andrew Aitken<sup>9</sup>, Environmental Scientist.

Sincerely,

DocuSigned by:



5991E19EF8094C3...

Victoria Tang  
Environmental Program Manager  
South Coast Region

## ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife  
Victoria Tang, Environmental Program Manager  
Steve Gibson, CESA Senior Environmental Scientist (Supervisory)  
Andrew Aitken, Environmental Scientist

Office of Land Use and Climate Innovation  
[State.Clearinghouse@lci.ca.gov](mailto:State.Clearinghouse@lci.ca.gov)

## REFERENCES

Bayne, E. M., Habib, L., and S. Boutin. 2008. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. *Conservation Biology* 22:1186–1193.

Francis, C.D., Ortega, C.P., and A. Cruz. 2009. Noise pollution changes avian communities and species interactions. *Current Biology* 19:1415–1419.

Halfwerk, W., Holleman, L.J.M., Lessells, Ck.M., Slabbekoorn, H. 2011. Negative impact of traffic noise on avian reproductive success. *Journal of Applied Ecology* 48:210–219.

---

<sup>9</sup> Phone: 562-525-9688; Email: Andrew.Aitken@wildlife.ca.gov

Mitali Gupta  
 Los Angeles County Metropolitan Transportation Authority  
 January 26, 2026  
 Page 9 of 13

Kleist, N. J., R. P. Guralnick, A. Cruz, C. A. Lowry, and C. D. Francis. 2018. Chronic anthropogenic noise disrupts glucocorticoid signaling and has multiple effects on fitness in an avian community. *Proceedings of the National Academy of Sciences* 115: E648– E657.

Kus, Barbara E.; Miner, Karen L. 1989. Use of Non-Riparian Habitats by Least Bell's Vireos. In: Abell, Dana L., Technical Coordinator. 1989. *Proceedings of the California Riparian Systems Conference: protection, management, and restoration for the 1990s*; 1988 September 22-24; Davis, CA. Gen. Tech. Rep. PSW-GTR-110. Berkeley, CA: Pacific Southwest Forest and Range Experiment Station, Forest Service, U.S. Department of Agriculture; p. 299-304.

Patricelli, G., and J.J.L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment. *Auk* 123:639–649.

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

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

| <b>Mitigation Measure</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Timing</b>                                                                 | <b>Responsible Party</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|--------------------------|
| <b>Mitigation Measure #1: Least Bell's Vireo Surveys</b> - The Project proponent shall retain a qualified biologist to conduct updated protocol level surveys for least Bell's vireo. The qualified biologist shall conduct surveys according to the United States Fish and Wildlife Service's <a href="#">Least Bell's Vireo Survey Guidelines</a> <sup>10</sup> (USFWS 2001). Per protocol, all potential least Bell's vireo habitat shall be surveyed at least eight times during the period from April 10 through July 31. CDFW and USFWS shall be notified of survey findings, including negative findings, within 45 calendar days following the | Prior to <input type="checkbox"/> Project <input type="checkbox"/> activities | Project Proponent        |

<sup>10</sup> <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-least-bells-vireo.pdf>

Mitali Gupta

Los Angeles County Metropolitan Transportation Authority

January 26, 2026

Page 10 of 13

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Timing                                                                        | Responsible Party |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------|
| completion of protocol-level surveys.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                               |                   |
| <b>Mitigation Measure #2: Incidental Take Permit</b> - If the Project would cause take of the CESA-listed species, the Project proponent shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.                                                                                          | Prior to <input type="checkbox"/> Project <input type="checkbox"/> activities | Project Proponent |
| <b>Mitigation Measure #3:</b> The Project applicant (or “entity”) must provide notification to CDFW pursuant to 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 <a href="https://wildlife.ca.gov/Conservation/LSA">Lake and Streambed Alteration Program</a> <sup>11</sup> webpage for information about LSA Notification and online submittal through the <a href="https://wildlife.ca.gov/Conservation/LSA">Environmental Permit Information</a> | Prior to <input type="checkbox"/> Project <input type="checkbox"/> activities | Project Proponent |

<sup>11</sup> <https://wildlife.ca.gov/Conservation/LSA>

Mitali Gupta

Los Angeles County Metropolitan Transportation Authority

January 26, 2026

Page 11 of 13

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Timing                        | Responsible Party |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------|
| <a href="#">Management System (EPIMS) Permitting Portal</a> <sup>12</sup> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                               |                   |
| <b>Mitigation Measure #4:</b> Best Management Practices (BMP) shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other products without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread. |                               |                   |
| <b>Mitigation Measure #5: Injured or Dead Wildlife</b> - If any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the designated biologist should be notified, and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | During Project Implementation | Project Proponent |

<sup>12</sup> <https://epims.wildlife.ca.gov/index.do>

Mitali Gupta

Los Angeles County Metropolitan Transportation Authority

January 26, 2026

Page 12 of 13

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Timing                                                                               | Responsible Party        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------|
| <p>dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</p>                                                                                                                                                                                          |                                                                                      |                          |
| <p><b>Recommendation #1:</b> CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.</p> | <p>Prior to <input type="checkbox"/> Project <input type="checkbox"/> activities</p> | <p>Project Proponent</p> |

Mitali Gupta

Los Angeles County Metropolitan Transportation Authority

January 26, 2026

Page 13 of 13

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Timing                               | Responsible Party  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------|
| <p><b>Recommendation #2:</b> 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.</p> <p>To compensate for any on- and off-site impacts to wetlands or 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.</p> | <p>Prior to adoption of the DEIR</p> | <p>Lead Agency</p> |