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August 28, 2025

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SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOPE GARDENS PROJECT, SCH NO. 2022060277, LOS ANGELES COUNTY, CA

Dear Jolee Hui:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the Los Angeles County Department of Regional Planning (LACDRP; Lead Agency) for the Hope Gardens Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

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

[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.

example, the Project may be subject to CDFW's 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[2] 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: Union Rescue Mission

Objective: The Project proposes the demolition and redevelopment of the existing Sequoia Lodge with a new multi-use Sequoia building within the Hope Gardens Family Center. The current development pad of the Sequoia Lodge would be replaced to accommodate the new building. The new building would consist of three stories with a main ground floor basement that would provide building space for 117 housing units and supportive services. The housing capacity would be increased to support 525 formerly homeless women and children. Supportive services that would be located on site for residents include counseling offices, administration offices, security office, medical examination rooms, dental examination rooms, day care center, computer lab, multi-purpose room, kitchen, and a communal dining room. The subterranean parking area would provide 22 parking spaces, bicycle spaces, and ADA parking. Additional Project improvements would include new paving and resurfacing of internal roadways and hardscapes around the new building footprint for circulation and building access as well as widening of the on-site bridge that is accessible from Lopez Canyon Road. Project activities required to complete the Project would entail demolition, construction, paving, resurfacing, and landscaping.

Location: The Project site is located at 12249 Lopez Canyon Road, near Sylmar in the unincorporated County of Los Angeles. The Project site is approximately 77 acres set within the Lopez Canyon in the San Gabiel Mountains. The site is bounded by Interstate 210 to the south, undeveloped land to the west, and the Angeles National Forest to the north and east.

Biological Setting: The Hope Gardens Family Center encompasses 77 acres in the foothills of the San Gabriel Mountains. The Project site is located within a woodland area of mature native and landscaped trees and has a relatively small increase in elevation from south to north in the main developed area. Currently the site has perimeter fencing surrounding the property that abuts the Angeles National Forest. General biological field surveys of the Project site were conducted in May 2019, June 2020, and October 2022, and findings were compiled in a Biological Resources Report (BRR). An oak tree survey was conducted in May 2019, and the site was revisited in

[2] "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."

October 2022. The BRR, jurisdictional delineation report, oak tree survey report, and oak woodland report are included in the DEIR appendices. During biological surveys, three vegetation communities were identified within the Biological Study Area, which include California sagebrush scrub (*Artemisia californica-Salvia leucophylla* Alliance), coast live oak woodland (*Quercus agrifolia* forest & woodland Alliance), and scrub oak chapparal (*Quercus berberidifolia* Alliance). Within the Project footprint, 0.13 acre of coast live oak woodland and 1.61 acres of the developed area will be impacted. In the Project footprint, there are 57 coast live oak trees and one heritage oak. The Project intends to remove four coast live oak trees and encroach upon the protected zone of 12 oak trees. No special-status plants were identified during surveys. Moreover, three unnamed ephemeral channels that traverse the oak woodland were identified on site.

No special-status wildlife were observed during the surveys. Species that are of potential concern for the Project include, but are not limited to, white-tailed kite (*Elanus leucurus*; fully protected species), Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), western mastiff bat (*Eumops perotis californicus*; California Species of Special Concern (SSC)), and nesting birds and raptors. The DEIR includes seven biological mitigation measures which detail nesting bird preconstruction surveys, replacement of coast live oak trees, tree protection for remaining coast live oak trees, focused bat surveys, notifying for a Lake and Streambed Alternation (LSA) Agreement, alternative off-site mitigation, fencing, and lighting.

Project Timeline: The Project is anticipated to commence in the third quarter of 2026 for a span of approximately 34 months. Demolition, grading, bridge widening, and installation of underground utilities are expected to take 10 months to complete. Building construction from foundations to occupancy is expected to take 24 months to complete.

Project History: CDFW previously reviewed the Notice of Preparation (NOP) and submitted a comment letter on July 19, 2022. Comments in the NOP addressed streams, oak trees, migratory birds, landscaping, pest management, and rodenticide use.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist LACDRP 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: Impacts on Oak Woodlands

Issue: The Project will directly impact the coast live oak woodland and remove oak trees within the Project site. The mitigation measures in the DEIR do not appropriately mitigate for the loss of oak woodland.

Specific impact: Project activities (e.g., tree removal, grading, and brush removal) would directly impact 0.13 acre of coast live oak woodland, remove four oak trees, and encroach on several remaining oak trees. Use of heavy machinery may result in the removal of whole trees, canopy, or roots which would adversely impact wildlife that utilize the trees as nesting and/or foraging habitat.

Why impact would occur: The coast live oak woodland is the primary vegetation community intermixed with the landscaping surrounding the Sequoia Lodge. The DEIR notes that coast live oak woodland does not classify as a sensitive natural community; however, portions of the oak woodland surrounding the river are considered riparian habitat and are considered sensitive (pg. 4.1-13). Furthermore, the DEIR states that the "[C]oast live oak woodland in this area is designated as Southern Coast Live Oak Riparian Forest by the CDFW and is considered a sensitive natural community because it is a riparian community surrounding the channelized areas" (pg. 4.1-5). CDFW considers oak woodlands as a sensitive natural community that supports a host of wildlife and impacts to this natural community should be appropriately mitigated for. Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). In addition to birds, mammals, reptiles, and amphibians depend on oak woodlands at some stage in their life cycle whether it is foraging acorns, providing refugia through leaf litter, or using cavities as shelter (Zack et al. 2002). Oak woodlands also serve several important ecological functions such as protecting soils from erosion and land sliding; regulating water flow in watersheds; and maintaining water quality in streams and rivers. Moreover, oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990).

LACDRP acknowledges that the loss of 0.13 acre of sensitive coast live oak woodland community would be a significant impact and proposes Mitigation Measure BIO-1, which would require the Project to plant eight replacement coast live oak trees along the adjacent the creek to reduce the level of impact to less than significant (pg. 4.1-32). Mitigation Measure BIO-5 is also incorporated in the DEIR to outline an alternative mitigation option to purchase mitigation credits at a 2:1 ratio. While CDFW appreciates the Project proponent would plant eight coast live oak trees, only planting trees does not fully mitigate on a biological level the permanent and temporal impacts on an oak woodland community. Appropriate compensatory mitigation would include habitat restoration or preservation of an in-kind oak woodland to ensure mitigation accounts for the natural community as a whole which includes, but is not limited to, plant assemblages, habitat composition, function, diversity, and structure.

Additionally, the location of the replanted trees may be within the current fuel modification zones and part of the landscaping plan. Generally, fuel modification activities such as tree trimming are conducted on a continuous basis and would not be appropriate for oak trees that are considered part of mitigation as it will take longer for those oaks to reach maturity. Planting eight oak trees as part of landscaping does not account for the loss of the woodland understory and is not viewed as appropriate mitigation since it will be subject to maintenance (i.e., pruning and irrigation).

Furthermore, Mitigation Measure BIO-1 states that the eight replacement trees would be cared for and maintained for a period of two years and replaced if mortality occurs. Oak trees have a slow growth rate and would take much longer than two years to mature or show signs of stress that could lead to mortality. If the Project proponent has to replace trees due to mortality, this action would result in prolonged temporal loss of habitat for wildlife that currently use that the Project site.

Lastly, the DEIR discusses potential off-site mitigation alternatives. Mitigation Measure BIO-5 discusses the option for the Project proponent to purchase mitigation credits for impacts at a 2:1 replacement ratio, which is the same proposed ratio as on-site tree replacement. Depending on the Project, off-site mitigation ratios may be higher than what is proposed on site given that the Project impacts are not being mitigated at the direct location of impacts. In addition to mitigation credits, Mitigation Measure BIO-1 provides the option to pay into the oak forests special fund at a dollar amount that will be determined by a qualified arborist. As currently written in the DEIR, it is unclear how or when the in-lieu fees would be applied to appropriately mitigate the loss of 0.13-acre oak woodland. Without disclosure of how the special funds are appropriated, the funds requested by LACDRP may not be at an amount sufficient to fully offset the loss of oak woodland. Additionally, the DEIR does not disclose a timeframe by which the special funds will be allocated toward mitigation efforts, which may result in unmitigated Project impacts and ongoing temporal loss of nesting and/or foraging habitat for wildlife.

Evidence impact would be significant: Oak trees and woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372) and Public Resources Code section 21083.4, due to the historic and on-going loss of these resources. Currently, coast live oak has a reduced range largely due to development and are often vulnerable to environmental effects of projects. Currently, only two-thirds of California's original oak woodlands remain (Zack et al. 2002). Inadequate or lack of avoidance, minimization, and mitigation measures for impacts to coast live oak woodlands may not minimize the Project's direct, indirect, and cumulative impacts to biological resources.

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure # 1: Mitigation Measure BIO-1 – Given that compensatory mitigation should account for the impacts on 0.13 acre of oak woodland as whole, CDFW requests that LACDRP revise Mitigation Measure BIO-1 to incorporate the underlined language and omit language in strikethrough:

Replacement of Coast Live Oak Woodland ~~Protected Coast Live Oak Trees~~:

- If avoidance is not feasible, the Project proponent shall provide on- or off-site mitigation for impacts to the coast live oak woodland to mimic the pre-Project percent basal, canopy, and vegetation cover of oak woodland impacted. At a minimum, 0.26 acres of coast live oak woodland shall be restored or preserved on site. Mitigation shall involve recreation of an oak woodland of similar composition, structure, and function to the selected oak woodland that was impacted. Mitigation shall include restoration of structurally diverse understory vegetation species (i.e., grass, forb, shrub, subshrub, vine) occurring in the impacted oak woodlands. Oak tree acorns shall be collected or grown from on-site sources or adjacent areas within the same watershed and shall not be purchased from a supplier. Seeds shall originate from plants/trees of the same species (i.e., Genus, species, subspecies, and variety) as the species impacted. Mitigation monitoring, management, and reporting for oak woodland should be provided for at least 10 years, with a minimum of seven years without supplemental irrigation, to ensure success of the restoration effort.

- A ~~Landscaping~~ Restoration Plan shall be prepared that includes requirements for oak-friendly landscaping under oaks and removal of regular irrigation under oak trees.

- At a minimum, ~~A total of~~ 16 ~~8~~ replacements oaks shall be planted to replace oaks removed. This replacement accounts for the removal of 4 protected oaks at a 4 ~~2~~:1 replacement ratio.

- A total of 8 oaks were assessed with the potential for death or significant decline due to the Project from either the trunk being located within 15 feet of the construction/area of disturbance or greater than 30 percent of the TPZ would be encroached. These oaks (#17, #18, #19, #20, #22, #23, #25, and #50) shall be properly cared for and monitored for a period of 10 ~~2~~ years and replaced at a 4 ~~2~~:1 replacement ratio by the permittee if mortality or significant decline (health assessed at a 1 or 2) occurs within that 10 ~~2~~-year period.

- Required replacement trees shall consist exclusively of indigenous oak trees and shall be in the replacement ratio of 4 ~~2~~:1. Each replacement tree shall be at least a 15-gallon size specimen and measure at least one inch in diameter one foot above the base. The hearing officer, director, or commission may, in lieu of this requirement, require the substitution of one larger container specimen for each oak tree to be replaced, where, in its opinion, the substitution is feasible, and conditions warrant such greater substitution.

- Replacement trees shall be properly cared for and maintained for a period of 10 ~~two~~ years and replaced by the permittee if mortality occurs within that period.

- Where feasible replacement trees should consist exclusively of indigenous oak trees and certified as being grown from a seed source collected in Los Angeles and Ventura counties.

- Replacement trees shall be planted and maintained within ~~or near~~ the Survey Area and outside of landscaping and fuel modification zones ~~and, if feasible, in the same general area where the trees were removed~~. The process of restoring or preserving a coast live oak woodland and replacement of oak trees shall be supervised in the field by a person who, in the opinion of the County forester and fire warden, has expertise in the planting, care and maintenance of oak trees.

- Potential planting sites within and near the Survey Area are shown in Figure 4.1-6, Potential Mitigation Planting Area. ~~Replacement plantings should be incorporated into proposed landscaping for the New Sequoia Building to the extent possible.~~ Plantings can be in the areas shown in Figure 4.1-6, Potential Mitigation Planting Area, that were chosen because they are currently free of trees or native vegetation and are contiguous with existing forested landscaping on the property. If enough suitable areas for mitigation plantings are not found within or near the Survey Area or within the Project Site as a whole, potential additional areas for replacement plantings include along Lopez Canyon Road and in the open areas of Angeles National Forest immediately east of the Project Site. Coordination with federal land managers would be required for plantings in the Angeles National Forest and coordination with state land managers would be necessary for plantings in the roadway right-of-way.

- No special-status plants or wildlife shall be impacted during the planting of replacement trees. If replacement trees are to be planted in areas of native habitat outside of the landscaped areas on the Hope Gardens property, or within the Angeles National Forest, a preconstruction survey shall be performed to ensure avoidance of impacts to special-status species. Prior to planting the replacement trees, the area shall be surveyed by a qualified biologist to determine that the area is suitable for the installation of replacement trees and that native plants or habitats would not be removed or crowded by the planting. Preconstruction surveys shall be timed to occur when able to observe potential target species above ground. A biologist shall prepare a report regarding the methods and findings of the preconstruction surveys, and an assessment of suitability of the location for installation of replacement planting. Any location determined to have special-status species or where planting would disturb, alter, or decrease the biological value of the habitat shall be avoided, and only locations where no impacts would occur (as determined by the qualified biologist) shall be used as planting sites. The County shall review the preconstruction survey report and approve all replacement planting and restoration or preservation of coast live oak woodland sites within areas of habitat outside of the Hope Gardens landscaped and disturbed areas prior to the installation of the planting.

- ~~If no suitable areas for replacement plantings are found~~ In addition to replanting on site, the Project proponent shall provide a payment into the oak forests special fund would be an alternative mitigation. The payment amount would be equivalent to the oaks that are impacted as determined by a qualified arborist, and the amount would require approval from the County forester.

Mitigation Measure #2: Mitigation Measure BIO-5 – CDFW request that LACDRP revise Mitigation Measure BIO-5 to incorporate the underlined language and omit language in strikethrough:

~~Oak trees are required to be planted at a 2:1 replacement ratio for each removal (see MM BIO-1). The replacement plantings of the coast live oaks shall be planted along the channels within riparian areas in the Survey Area to the extent feasible. This replacement of riparian habitat would be considered suitable compensation for the impacts to riparian trees.~~ Alternative off-site mitigation considered suitable would be through purchase of mitigation credits for impacts to coast live oak riparian woodlands at a minimum 2:1 replacement ratio based on the existing and proposed mitigation woodland habitat value and function and would be subject to County review and approval.

Recommendation # 1: Oak Litter - CDFW recommends salvaging oak leaf litter or duff prior to Project ground-disturbing activities or vegetation removal impacting oak woodlands. Oak leaf litter contains beneficial mycorrhizae, microorganisms, and nutrients that could be used in restoration of oak woodlands. Oak leaf litter should not be taken outside of the Project boundary to prevent the spread of potential pathogens.

COMMENT # 2: Impacts on Crotch's Bumble Bee

Issue: The Project has potential to impact suitable nesting habitat and foraging opportunities for Crotch's bumble bee or may result in direct or indirect mortality. The DEIR does not include measures to ensure impacts to the species are appropriately addressed.

Specific impact: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva, result in burrow collapse or nest abandonment, and may result in reduced nest success.

Why impact would occur: The DEIR acknowledges the medium potential for Crotch's bumble bee to utilize the California sagebrush scrub identified within the Biological Study Area. Additionally, the DEIR states that "[W]hile the coast live oak woodland has a species that serves as a host plant to Crotch's bumble bee (*Eriogonum fasciculatum*), only a few small shrubs were observed, and the level of disturbance has eliminated habitat" (pg. 4.1-30, 31). CDFW disagrees with LACDRP's conclusion that the Project would not result in direct and indirect impacts to Crotch's bumble bee.

Crotch's bumble bee are generalists and known to utilize a variety of sources for nesting and overwintering opportunities. Crotch's bumble bee primarily uses abandoned small mammal burrows to nest, but this species may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Given that a coast live oak woodland exist on site and California sagebrush scrub is adjacent to the Project footprint, there is potential for this CESA candidate species to be detected prior to or during Project activities.

No focused surveys were conducted for Crotch's bumble bee by a CDFW-approved qualified biologist. Additionally, the DEIR does not have any species specific-measures that outline focused surveys or actions if this CESA candidate species is observed on site. If the Project proceeds without appropriate focused surveys, the Project may result in mortality and/or injury of undetected individual Crotch's bumble bee that may be present during Project activities. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could also result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project area.

Evidence impact would be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the population size and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a State Ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority[3]. Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the District (CEQA Guidelines, § 1565).

Recommended Potentially Feasible Mitigation Measure(s)

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

[3] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline

Mitigation Measure # 3: Herbicide and Pesticide Use – To avoid impacts to pollinators, including Crotch's bumble bee, the Project proponent shall ensure that herbicides and pesticides are not sprayed at any time in the Project site or near any flowering plants.

Mitigation Measure # 4: Crotch's Bumble Bee Surveys - The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species[4]. Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch's bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and LACDRP prior to implementing Project ground-disturbing activities.

Mitigation Measure #5: Incidental Take Permit - If Crotch's bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to LACDRP prior to implementing Project ground-disturbing activities and vegetation removal.

Recommendation #2: CEQA - CDFW's issuance of an Incidental Take Permit (ITP) for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the Lead Agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

COMMENT # 3: Impacts on Bat Species and Roosts

Issue: Mitigation Measure BIO-3 does not propose compensatory mitigation to offset Project impacts on bats species that may utilize the Project site as roosting habitat.

Specific impact: The Project would result in the removal of trees, demolition of buildings, and vegetation removal within the Project footprint. These activities could result in direct mortality of individual bats or roost disturbance via increased noise

[4] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

disturbances, human activity, dust, ground-disturbing activities (e.g., staging, access, grading, excavating, paving), and vibrations caused by heavy equipment.

Why impact would occur: As stated in the DEIR "[S]pecial-status bats, such as western mastiff bat, may forage in the open woodland habitat or roost in the hollows of oak trees and the loss of 0.13-acre of this habitat would be a significant impact" (pg. 4.1-31). LACDRP incorporates Mitigation Measure BIO-3 in the DEIR that outlines focused bat surveys and roosting site protection during Project activities. CDFW appreciates the robust mitigation measure and believes that the mitigation measure should also outline compensatory mitigation in the event that full Project avoidance on individual bats and/or roosts (i.e., daytime, maternity) is not achievable. Without replacement of bat roosting habitat, the Project would contribute to the cumulative loss of suitable bat habitat on a local and regional scale. At a minimum the LACDRP and Project proponent should consider providing artificial roosting structures to replace natural roosting habitat on site.

Evidence impact may be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Additionally, a California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under ESA-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA- threatened or - endangered status (CDFW 2025).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure # 6: CDFW requests LACDRP revise Mitigation Measure BIO-3 to incorporate the underlined language and omit the language in strikethrough:

- Where Project-related implementation, construction, and activities would occur near potential roosting habitat for bats, such as tall trees, a qualified bat specialist shall conduct bat surveys within 14 days before construction throughout ~~within~~ these areas (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Surveys should be conducted using acoustic recognition technology to maximize detection of bats. The biologist conducting the preconstruction survey would also identify the nature of the bat utilization (in essence, no roosting, night roost, day roost, hibernation roost, or maternity roost) and determine if passive bat exclusion would be necessary and feasible. A discussion of survey results, including negative findings, shall be provided to LACDRP and CDFW. If individual bats are identified, the Project proponent and qualified bat specialist shall coordinate and receive written concurrence from CDFW on the appropriate avoidance buffers and avoidance actions.

- To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees should be pushed down using heavy machinery rather than felling with chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape.

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

- If maternity roosts are found and the County and CDFW determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology

should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before subset and 30 minutes after sunrise.

- If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.

ADDITIONAL COMMENTS

Fully Protected Species. White-tailed kite are generally found in open areas such as open woodlands and nest in the canopy of trees. The DEIR notes that white-tailed kite may move through the Project site and surrounding areas (pg. 4.1-17). Fully Protected Species may not be taken or possessed at any time according to the Fish and Game Code § 3511. CDFW cannot authorize take for white-tailed kite and LACDRP must completely avoid impacts to these species during Project's construction and operational activities. While the DEIR claims white-tailed kite would likely avoid the development and prefer the adjacent undeveloped habitat. CDFW recommends that the final EIR contain a discussion of full avoidance of impacts to white-tailed kite and include a mitigation measure, if appropriate.

Nesting Birds and Raptors. – The Migratory Bird Treaty Act of 1918 prohibits the take of protected migratory bird species and Fish and Game Code § 3503.5 prohibits the take of any birds in the orders of Falconiformes or Strigiformes. To avoid impacts on nesting birds and raptors, CDFW requests LACDRP revise RR-BIO-1 to incorporate the underlined language and omit language in strikethrough:

- If possible, ground disturbing activities and vegetation removal (including tree trimming) should be timed to occur outside the bird nesting season (September 1 – January 14).

- If ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (January 15 – August 31) a preconstruction survey for nesting birds and raptors should be conducted within

72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird and raptors surveys for construction projects. The preconstruction survey area should include the Development Site boundary and suitable habitat within a 500 ~~300~~-foot buffer, as access allows ~~or a buffer size determined by the qualified biologist based on level of proposed disturbance and access~~. If no active nests are found, no additional measures are required.

- If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist. A no-work buffer of 500 feet shall be used to protect nesting raptors, and a no-work buffer of 300 feet shall be used to protect nesting birds. If appropriate, a small buffer may be considered as determined by the qualified biologist ~~and~~ based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active. Personnel working on the Project, including all contractors working on site, shall be instructed on the presence of nesting birds and raptors, area sensitivity, and adherence to the no-work buffers.

Lake and Streambed Alteration Agreement Acknowledgement. CDFW concurs with MM BIO-4 to coordinate with CDFW pursuant to Fish and Game Code, section 1600 et seq. The Project proponent should notify prior to any Project construction or activities. Based on this notification and other information, CDFW determines whether an LSA with the Project proponent is required prior to conducting the proposed activities. Please visit the Lake and Streambed Alteration[5] Program webpage to obtain a notification package for an LSA. We look forward to further coordination with the Project proponent, and receipt of the streambed notification package for the Project.

Landscaping. CDFW recommends the LACDRP incorporates a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council[6]. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include the MMs recommended in this letter. CDFW has

[5] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA
[6] https://www.cal-ipc.org/plants/inventory/

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 MMs (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). LACDRP is welcome to coordinate with CDFW to further review and refine the Project's MMs. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested MMs 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 (CNDDB). The CNDDB website[7] 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[8].

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

[7] https://wildlife.ca.gov/Data/CNDDB
[8] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

Questions regarding this letter or further coordination should be directed to Julisa Portugal[9], Senior Environmental Scientist (Specialist).

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, CDFW Environmental Program Manager
Steve Gibson, Senior Environmental Scientist Supervisor

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

REFERENCES

Block, W.M., Morrison, M.M., Verner, J. 1990. Wildlife and oak-woodland interdependency. Fremontia 18(3):72-76.

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[9] Phone: (858) 203-5872; Email: julisa.portugal@wildlife.ca.gov

Zack, S., and California Partners in Flight. 2002. The Oak Woodland Bird Conservation Plan: A Strategy for Protecting and Managing Oak Woodland Habitats and Associated Birds in California, 126 pp.

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
Mitigation Measure #1: Mitigation Measure BIO-1 **Replacement of Coast Live Oak Woodland**: • If avoidance is not feasible, the Project proponent shall provide on- or off-site mitigation for impacts to the coast live oak woodland to mimic the pre-Project percent basal, canopy, and vegetation cover of oak woodland impacted. At a minimum, 0.26 acres of coast live oak woodland shall be restored or preserved on site. Mitigation shall involve recreation of an oak woodland of similar composition, structure, and function to the selected oak woodland that was impacted. Mitigation shall include restoration of structurally diverse understory vegetation species (i.e., grass, forb, shrub, subshrub, vine) occurring in the impacted oak woodlands. Oak tree acorns shall be collected or grown from on-site sources or adjacent areas within the same watershed and shall not be purchased from a supplier. Seeds shall originate from plants/trees of the same species (i.e., Genus, species, subspecies, and variety) as the species impacted. Mitigation monitoring, management, and reporting for oak woodland should be provided for at least 10 years, with a minimum of seven years without supplemental irrigation, to ensure success of the restoration effort. • A Restoration Plan shall be prepared that includes requirements for oak-friendly landscaping under oaks and removal of regular irrigation under oak trees.	Prior to, during, and following Project activities	Lead Agency/ Project Proponent

Mitigation Measure	Timing	Responsible Party
• At a minimum, 16 replacements oaks shall be planted to replace oaks removed. This replacement accounts for the removal of 4 protected oaks at a 4 :1 replacement ratio. • A total of 8 oaks were assessed with the potential for death or significant decline due to the Project from either the trunk being located within 15 feet of the construction/area of disturbance or greater than 30 percent of the TPZ would be encroached. These oaks (#17, #18, #19, #20, #22, #23, #25, and #50) shall be properly cared for and monitored for a period of 10 years and replaced at a 4:1 replacement ratio by the permittee if mortality or significant decline (health assessed at a 1 or 2) occurs within that 10 year period. • Required replacement trees shall consist exclusively of indigenous oak trees and shall be in the replacement ratio of 4:1. Each replacement tree shall be at least a 15-gallon size specimen and measure at least one inch in diameter one foot above the base. The hearing officer, director, or commission may, in lieu of this requirement, require the substitution of one larger container specimen for each oak tree to be replaced, where, in its opinion, the substitution is feasible, and conditions warrant such greater substitution. • Replacement trees shall be properly cared for and maintained for a period of 10 years and replaced by the permittee if mortality occurs within that period. • Where feasible replacement trees should consist exclusively of indigenous oak trees and certified as being grown from a seed source collected in Los Angeles and Ventura counties.		

Mitigation Measure	Timing	Responsible Party
• Replacement trees shall be planted and maintained within the Survey Area and outside of landscaping and fuel modification zones. The process of restoring or preserving a coast live oak woodland and replacement of oak trees shall be supervised in the field by a person who, in the opinion of the County forester and fire warden, has expertise in the planting, care and maintenance of oak trees. • Potential planting sites within and near the Survey Area are shown in Figure 4.1-6, Potential Mitigation Planting Area. Plantings can be in the areas shown in Figure 4.1-6, Potential Mitigation Planting Area, that were chosen because they are currently free of trees or native vegetation and are contiguous with existing forested landscaping on the property. If enough suitable areas for mitigation plantings are not found within or near the Survey Area or within the Project Site as a whole, potential additional areas for replacement plantings include along Lopez Canyon Road and in the open areas of Angeles National Forest immediately east of the Project Site. Coordination with federal land managers would be required for plantings in the Angeles National Forest and coordination with state land managers would be necessary for plantings in the roadway right-of-way. • No special-status plants or wildlife shall be impacted during the planting of replacement trees. If replacement trees are to be planted in areas of native habitat outside of the landscaped areas on the Hope Gardens property, or within the Angeles National Forest, a preconstruction survey shall be performed to ensure avoidance of impacts to special-status species. Prior to planting the replacement trees, the area shall be surveyed by a qualified biologist to determine that the area is suitable for the installation of replacement trees and that native plants or habitats would not be removed or crowded by the planting.		

Mitigation Measure	Timing	Responsible Party
Preconstruction surveys shall be timed to occur when able to observe potential target species above ground. A biologist shall prepare a report regarding the methods and findings of the preconstruction surveys, and an assessment of suitability of the location for installation of replacement planting. Any location determined to have special-status species or where planting would disturb, alter, or decrease the biological value of the habitat shall be avoided, and only locations where no impacts would occur (as determined by the qualified biologist) shall be used as planting sites. The County shall review the preconstruction survey report and approve all replacement planting and restoration or preservation of coast live oak woodland sites within areas of habitat outside of the Hope Gardens landscaped and disturbed areas prior to the installation of the planting. • In addition to replanting on site, the Project proponent shall provide a payment into the oak forests special fund would be an alternative mitigation. The payment amount would be equivalent to the oaks that are impacted as determined by a qualified arborist, and the amount would require approval from the County forester.		
Mitigation Measure #2: Mitigation Measure BIO-5 Alternative off-site mitigation considered suitable would be through purchase of mitigation credits for impacts to coast live oak riparian woodlands at a minimum 2:1 replacement ratio based on the existing and proposed mitigation woodland habitat value and function and would be subject to County review and approval.	Prior to Project activities	Project Proponent
Mitigation Measure #3: Herbicide and Pesticide Use To avoid impacts to pollinators, including Crotch's bumble bee, the Project proponent shall ensure that	Prior to, during, and following	Project Proponent

Mitigation Measure	Timing	Responsible Party
herbicides and pesticides are not sprayed at any time in the Project site or near any flowering plants.	Project activities	
Mitigation Measure #4: Crotch's Bumble Bee Surveys The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch's bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and LACDRP prior to implementing Project ground-disturbing activities.	Prior to Project activities	Qualified Biologist
Mitigation Measure #5: Incidental Take Permit If Crotch's bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW. The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to LACDRP prior to implementing Project ground-disturbing activities and vegetation removal.	Prior to Project activities	Project Proponent
Mitigation Measure #6: Mitigation Measure BIO-3 • Where Project-related implementation, construction, and activities would occur near potential roosting habitat for bats, such as tall trees, a qualified bat specialist shall conduct bat surveys within 14 days before construction throughout these areas (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any	Prior to and during Project activities	Project Proponent/ Bat Specialist

Mitigation Measure	Timing	Responsible Party
maternity roosts. Surveys should be conducted using acoustic recognition technology to maximize detection of bats. The biologist conducting the preconstruction survey would also identify the nature of the bat utilization (in essence, no roosting, night roost, day roost, hibernation roost, or maternity roost) and determine if passive bat exclusion would be necessary and feasible. A discussion of survey results, including negative findings, shall be provided to LACDRP and CDFW. If individual bats are identified, the Project proponent and qualified bat specialist shall coordinate and receive written concurrence from CDFW on the appropriate avoidance buffers and avoidance actions. • To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees should be pushed down using heavy machinery rather than felling with chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. • If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season		

Mitigation Measure	Timing	Responsible Party
when young bats are present but are yet ready to fly out of the roost (March 1 to September 30). • If maternity roosts are found and the County and CDFW determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before subset and 30 minutes after sunrise. • If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.		

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #7: RR-BIO-1 • If possible, ground disturbing activities and vegetation removal (including tree trimming) should be timed to occur outside the bird nesting season (September 1 – January 14). • If ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (January 15 – August 31) a preconstruction survey for nesting birds and raptors should be conducted within 72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird and raptors surveys for construction projects. The preconstruction survey area should include the Development Site boundary and suitable habitat within a 500-foot buffer, as access allows. If no active nests are found, no additional measures are required. • If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist. A no-work buffer of 500 feet shall be used to protect nesting raptors, and a no-work buffer of 300 feet shall be used to protect nesting birds. If appropriate, a small buffer may be considered as determined by the qualified biologist based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active. Personnel working on the Project, including all contractors working on site, shall be instructed on the presence of nesting birds and raptors, area sensitivity, and adherence to the no-work buffers.	Prior to and during Project activities	Qualified Biologist

Mitigation Measure	Timing	Responsible Party
Recommendation #1: Oak Litter CDFW recommends salvaging oak leaf litter or duff prior to Project ground-disturbing activities or vegetation removal impacting oak woodlands. Oak leaf litter contains beneficial mycorrhizae, microorganisms, and nutrients that could be used in restoration of oak woodlands. Oak leaf litter should not be taken outside of the Project boundary to prevent the spread of potential pathogens.	Prior to Project activities	Qualified Biologist
Recommendation #2: CEQA To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to final EIR	Lead Agency
Recommendation #3: Fully Protected Species CDFW recommends that the final EIR contain a discussion of full avoidance of impacts to white-tailed kite and include a mitigation measure, if appropriate.	Prior to final EIR	Lead Agency
Recommendation #4: Lake and Streambed Alteration Agreement Acknowledgment The Project proponent should notify prior to any Project construction or activities. Based on this notification and other information, CDFW determines whether an LSA with the Project proponent is required prior to conducting the proposed activities. Please visit the Lake and Streambed Alteration Program webpage to obtain a notification package for an LSA.	Prior to Project activities	Project Proponent

Mitigation Measure	Timing	Responsible Party
Recommendation #5: Landscaping CDFW recommends the LACDRP incorporates a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.	Prior to final EIR	Lead Agency/ Project Proponent