

Comment Letter No. 4



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 8, 2020

Ms. Kathryn Laudeman
Los Angeles Department of Water and Power
111 N. Hope Street Room 1044
Los Angeles, CA 90012
kathryn.laudeman@ladwp.com

**Subject: Mitigated Negative Declaration for the Silver Lake and Ivanhoe Reservoirs
Aeration and Recirculation System Project, SCH # 2020050161, Los Angeles
County**

Dear Ms. Laudeman:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the Silver Lake and Ivanhoe Reservoirs Aeration and Recirculation System Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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Project Description and Summary

Objective: As the Lead Agency, Los Angeles Department of Water and Power (LADWP) proposes the Silver Lake and Ivanhoe Reservoirs Aeration and Recirculation System Project (Project) within its Silver Lake Reservoir Complex (SLRC), which comprises the Silver Lake and Ivanhoe Reservoirs (reservoirs). The proposed Project is intended to discourage algae growth and reduce related odors from anaerobic conditions in the SLRC to ensure that reasonable water quality parameters are met for visual aesthetics and controlling odors. The Project would be implemented in two phases and would include the installation of a bubble plume aeration system and a recirculation pipe system to ensure oxygenation and destratification of the reservoirs.

Construction of Phase 1 is anticipated to begin in November 2020 and take approximately 13 months to complete concluding in December 2021. Phase 1 would include installation of an aeration system consisting of air blowers, air piping to each of the reservoirs, bubble plume system diffusers in each of the reservoirs, and aftercoolers. The air blowers would be housed in an enclosure at the existing chlorination building consisting of a local control panel and electrical power to support the air blowers and appurtenant equipment. Site preparation for the enclosure would include demolition of existing concrete slabs, installation of 40 polyvinyl chloride (PVC) conduits, and construction and casting of concrete and equipment pads. The concrete and equipment pads would require the site to be cleared, excavated up to 3 feet, and graded. After construction of the air blower enclosures, air pipes would be installed from the air blowers to diffuser systems at each reservoir. The pipes would be installed underground utilizing trenching and backfilling methods.

Construction of Phase 2 is anticipated to start toward the end of Phase I and take approximately 16 months to complete concluding in December 2022. Phase 2 would include installation of a pipeline in Ivanhoe Reservoir, installation of concrete plugs at the existing Ivanhoe Bypass and Ivanhoe Inlet tower, demolition of the existing equipment in the existing Gate 456 structure, installation of a suction intake on the existing Silver Lake bypass pipeline, and construction of the recirculation pump station within the Gate 456 structure, including a partition wall. Before installation of the concrete plugs, water from Ivanhoe Reservoir would be pumped into Silver Lake Reservoir. Demolition would involve removal of existing electrical and mechanical equipment and an existing concrete slab within the Gate 456 structure. The recirculation pump station equipment would be located within the Gate 456 structure. Construction activities for the recirculation pump station would include excavation up to 4 feet for a 15-foot by 27-foot duct bank, construction of 40 PVC conduits, casting equipment pads and concrete slabs for a 6-foot by 3-foot sized enclosure, installation of the control system, and connecting the control panel to the equipment and pipes.

Approximately 1,102 and 167 cubic yards of material would be imported to the Project site for Phase 1 and 2, respectively. Materials required for construction of Phase 1 and 2 would be stored on site, except for asphalt and concrete. Construction activities for Phase 1 and 2 would each require heavy equipment including asphalt paver, backhoe loader, barge, butt fusion machine, crane, front end loader, fork lift, generator, roller, and vibrating plate as well as maintenance and dump trucks. All equipment would be stored on site.

Location: The 1,237-acre, LADWP-owned SLRC is in the Silver Lake community of the City of Los Angeles, approximately 5 miles north of downtown Los Angeles. The SLRC is generally

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bounded by Tesla Avenue on the north, Armstrong Avenue and Silver Lake Boulevard on the east, Van Pelt Place on the south, and Silver Lake Drive on the west. Regional access to the SLRC is provided via Interstate 5 (I-5, Golden State Freeway), U.S. Route 101 (US 101, Hollywood Freeway), and State Route 110 (SR 110, Pasadena Freeway).

Comments and Recommendations

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

Project Description and Related Impact Shortcomings

Comment #1: Impacts to Nesting Birds

Issue: Birds may nest in trees, shrubs, or in open fields and grasslands surrounding the Project site. Mature Eucalyptus groves are located on the east and west sides of the SLRC (GPA Consulting 2019). Other tree species present in the SLRC include Coast live oak (*Quercus agrifolia*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), pines (*Pinus* spp.) and blue elderberry (*Sambucus nigra* ssp. *caerulea*) (GPA Consulting 2019). Page 8 of *Initial Study/Mitigated Negative Declaration Appendix B* (IS/MND Appendix B) states that the vegetation in the landscaped area on the east side of Ivanhoe Reservoir includes "plantings of spruce trees (*Picea* sp.), mulefat (*Baccharis salicifolia*), willow (*Salix* sp.), olive (*Olea europaea*), and other shrubs, with a ground cover of deer grass (*Muhlenbergia rigens*) and ornamental iris (*Iris* sp.)."

In the last 10 years, 170 species of birds have been observed at the SLRC, including two CESA-listed species: willow flycatcher (*Empidonax traillii*) and bank swallow (*Riparia riparia*). A review of the California Natural Diversity Database (CNDDDB) indicates that there is historic record of observation of southwestern willow flycatcher (*E. traillii extimus*) and three recorded observations of least Bell's vireo (*Vireo bellii pusillus*) are within 2 miles of the SLRC. Great blue heron (*Ardea herodias*), great horned owl (*Bubo virginianus*), northern mockingbird (*Mimus polyglottos*), and red-tailed hawk (*Buteo jamaicensis*) have been observed nesting in the SLRC (GPA Consulting 2019). Page 8 of IS/MND Appendix B states that "a great blue heron rookery has been present within the Eucalyptus grove on the west side of the Silver Lake Reservoir since at least 2005...approximately 14 nests in the rookery [were observed] during regular surveys and monitoring in 2015." Page 18 states that "ornamental vegetation provides suitable nesting habitat for common urban bird species."

Specific impacts: Project construction may occur during the bird nesting season. Construction staging and laydown areas would occur within the SLRC, and construction equipment and materials would remain or be stored at the Project site. Construction vehicle access would be available via the existing driveway at the northeast corner of the SLRC near the intersection of Tesla Avenue and Armstrong Avenue. Construction of Phase 1 and 2 would require approximately 277 and 81 truck trips, respectively. The estimated daily average of on-site workers would consist of a peak of 29 and 22 workers per day for Phase 1 and 2, respectively.

Construction activities for Phase 1 include site preparation for the air blower enclosure at the existing chlorination building. This would require the site to be cleared, excavated up to 3 feet,

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and graded. The existing chlorination building is surrounded by trees. Juvenile mockingbirds have been observed near the chlorination building (GPA Consulting 2019). Construction activities for Phase 2 include installation of the Ivanhoe Bypass Pipeline Plug, demolition of the existing equipment in the Gate 456 structure, and construction of the recirculation pump station within the Gate 456 structure. Ornamental landscape species, including willow, deer grass, and ornamental iris, and would be removed during installation of the Ivanhoe Bypass Pipeline Plug (see IS/MND Appendix B Photo 3). Juvenile mockingbirds have been observed near the proposed location for the Ivanhoe Bypass Pipeline Plug (GPA Consulting 2019). Gate 456 structure is surrounded by trees where red-tailed hawks and great blue herons have historically used for nesting.

Why impacts would occur: Construction during the breeding season for nesting birds could result in the loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Impacts could result from noise disturbances, increased human activity, dust, vegetation clearing, ground disturbing activities (e.g. staging, access, excavation, grading), and vibrations caused by heavy equipment. Such disturbances could result in increased nestling mortality due to nest abandonment or decreased feeding frequency.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code sections 3503 and 3503.5. Noise from increased road use, generators, and other equipment may disrupt willow flycatcher mating calls which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To protect nesting birds that may occur on site, CDFW recommends that the final environmental document include a measure that no construction should occur from February 15 through August 31, and as early as January 1 for raptors.

Mitigation Measure #2: If construction during this period must occur, a qualified biologist should complete a survey for nesting bird activity within the Project site and a 500-foot buffer. Surveys will begin no more than 14 days prior to the start of Project activities and will be repeated for the duration of Project activities that occur during the bird nesting season. Nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites.

Mitigation Measure #3: If an active nest is found within 500 feet of Project activities and in areas with increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g. staging, access, excavation, grading), and vibrations caused by heavy equipment, a qualified biologist should determine the nesting status and set up a species-appropriate no-work buffer that should be no less than 300 feet initially. Buffers should be marked around the active nest site as directed by the qualified biologist.

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No Project activities should be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers should be increased if needed to protect the nesting birds.

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Mitigation Measure #4: Any removal of vegetation when birds are likely to be nesting should be monitored by a qualified biologist and should only occur when a qualified biologist is present.

Mitigation Measure #5: After construction activities are complete, vegetation should be restored around the Ivanhoe Bypass Pipeline Plug site and all areas where vegetation was removed or disturbed as part of Project activities. Revegetation should restore a 1:1 ratio of trees, shrubs, grasses, and low ground-cover species removed. Vegetation cover, diversity, and density should be restored to conditions before Project construction. If construction of a new facility (e.g. Ivanhoe Bypass Pipeline Plug) does not allow for 1:1 revegetation or restoration equal to the area disturbed, revegetation should occur near the new facility if feasible or where there is low or bare ground cover in the landscaped area that would provide ecological benefits to birds. The revegetation area should be equal to or more than the total amount of area disturbed. Planting should occur outside of bird nesting season. The Project proponent should monitor planting success or mortality and perform infill planting if needed.

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Comment #2: Special-Status Plant Survey

Issue: A biological resource field survey was conducted on January 10, 2020. Page 6 of IS/MND Appendix B states "seasonal, species-specific botanical and wildlife surveys were not conducted as part of this evaluation; however, based on the survey conducted and an assessment of conditions in the [SLRC], it is apparent that special-status plant and wildlife species are not anticipated within the SLRC and surrounding urbanized environment."

Of the 66 special-status plant species considered for the IS/MND, 13 are federal Endangered Species Act and/or CESA-listed species. These species typically bloom between March through July except for Brauton's milk-vetch (*Astragalus brauntonii*) which could bloom early in January. A more robust, season-specific survey of plants, particularly species found in disturbed areas, is needed to determine whether species-status plants are present or absent.

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Specific impacts: Project activities including vegetation clearing and ground disturbance (e.g. staging, access, excavation, grading, parking, trampling) would occur in areas that have been historically disturbed or landscaped. Species-status plants found in disturbed areas may be impacted by Project activities. One species that could occur is the San Bernardino aster (*Symphyotrichum defoliatum*), listed by California Native Plant Society (CNPS) as having a rarity ranking of 1B.2 (GPA Consulting 2019). This is considered moderately threatened in California and thus a locally rare plant species that warrants mitigation.

Why impact would occur: Project activities, including vegetation clearing and ground disturbance (e.g. staging, access, excavation, grading, parking, trampling) may result in direct mortality, population declines, or local extirpation of special-status plants.

Evidence impacts would be significant: Impacts to special-status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these special-status plant species will result in the Project to have a substantial adverse direct,

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indirect, and cumulative effect, on any species identified as a candidate, sensitive, or species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends conducting focused surveys for special-status plants on site and disclosing the results in the final environmental document. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018), a qualified biologist should “conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting.” The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

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Comment #3: Impacts to Bats

Issue: Based on a survey by AECOM in 2015 in support of the SLRC storage Replacement Project, five species of bats forage in the SLRC: western red bat (*Lasiurus blossevillei*), hoary bat (*Lasiurus cinereus*), Yuma myotis (*Myotis yumanensis*), canyon bat (*Prastrelus hesperus*), and Mexican free-tailed bat (*Tadarida brasiliensis*). Bats could roost in crevices, hollow trees, and buildings in the SLRC. Night roosts are typically utilized from the approach of sunset until sunrise. In most parts of California, night-roost use will only occur from spring through fall (Johnston et al. 2004). Day-roost use usually occurs during the spring, summer, and fall in California (Johnston et al. 2004).

Specific impacts: Impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g. staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition, grading, and excavating activities around the chlorination building during Phase 1 may impact bats potentially using the building or surrounding trees as roost sites.

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Why impact would occur: Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150, Cal. Code Regs., § 251.1).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To protect bats and roosts that may occur on site, CDFW recommends that the final environmental document include a measure that a qualified bat specialist conduct a pre-construction survey to identify trees and/or structures that could provide day and/or night-

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time roost sites for bats. Work activities should not occur under the structure between 30 minutes before sunset and 30 minutes after sunrise. Work should not occur within 100 feet of or directly under or adjacent to an active roost during the breeding season when young are present but are not yet ready to fly (generally April and August) (Johnston et al. 2004). CDFW recommends that the final environmental document include a measure that no construction should occur between 30 minutes before sunset and 30 minutes after sunrise during the non-volant period between April and August if day-time roost sites are found.

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Comment #4: Impacts to Birds and Wildlife During Draining of Ivanhoe Reservoir & Notification of Lake and Streambed Alteration Agreement

Issue: To facilitated installation of the Ivanhoe Inlet Tower Plug and Ivanhoe Bypass Pipeline Plug as part of Phase 2 of the Project, water from Ivanhoe Reservoir would be pumped into Silver Lake Reservoir.

Specific impact: While Silver Lake Reservoir will not be drained and will “provide ample resting space immediately adjacent” to the Ivanhoe Reservoir (IS/MND Appendix B page 19), draining the Ivanhoe Reservoir would be temporary elimination of stopover opportunities for birds.

Why impacts would occur: Draining of the Ivanhoe Reservoir could lead to bird mortality if they are present in the reservoir.

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Evidence impacts would be significant: Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act of 1918 (Code of Federal Regulations, Title 50, § 10.13) and Fish and Game Code, sections 3503 *et seq.* and 3513.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends that the final environmental document include a measure to have a qualified biologist on site during draining and refilling of the Ivanhoe Reservoir to monitor for birds and could temporarily stop activities or regulate draining rate if necessary, to prevent bird mortality and injury to native aquatic species. The reservoir should be drained completely, not left partially drained, to temporarily eliminate the Ivanhoe Reservoir as a stopover opportunity during Project activities.

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by LADWP and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

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Conclusion

We appreciate the opportunity to comment on the Project to assist Los Angeles Department of Water and Power in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the LADWP has to our comments and to receive notification of any forthcoming hearing date(s) for

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the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist, at Ruby.Kwan-Davis@wildlife.ca.gov or (657) 215-1007.

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Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
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Erinn Wilson
Environmental Program Manager I

cc: CDFW

Victoria Tang – Los Alamitos
Megan Evans – Los Alamitos
Andrew Valand – Los Alamitos
Frederic Reiman – Los Alamitos
Felicia Silva – Los Alamitos
David Lin – Los Alamitos
Malinda Santonil – Los Alamitos
CEQA Program Coordinator - Sacramento

State Clearinghouse

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South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

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CHARLTON H. BONHAM, Director



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

Biological Resources (BIO)			
Mitigation Measure (MM)		Timing	Responsible Party
MM-BIO-1 – Impacts to Nesting Birds	To protect nesting birds no Project activity shall occur from February 15 (January 1 for raptors) through August 31.	NA	Los Angeles Department of Water and Power
MM-BIO-2 – Impacts to Nesting Birds	If construction during the above period must occur, a qualified biologist shall complete a survey for nesting bird activity within the Project site and a 500-foot buffer. Surveys will begin no more than 14 days prior to the start of Project activities and will be repeated for the duration of Project activities that occur during the bird nesting season. Nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites.	Prior to and during Project activities	Los Angeles Department of Water and Power
MM-BIO-3 – Impacts to Nesting Birds -	If an active nest is found within 500 feet of Project activities and in areas with increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g. staging, access, excavation, grading), and vibrations caused by heavy equipment, a qualified biologist shall determine the nesting status and set up a species-appropriate no-work buffer that shall be no less than 300 feet initially. Buffers shall be marked around the active nest site as directed by the qualified biologist. No Project activities shall be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds.	During construction/ Project activities	Los Angeles Department of Water and Power

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Biological Resources (BIO)			
Mitigation Measure (MM)		Timing	Responsible Party
MM-BIO-4 – Impacts to Nesting Birds	During time of year when nesting birds are likely to be nesting any removal of vegetation shall be monitored by a qualified biologist and will only occur when a qualified biologist is present.	During construction/ Project activities	Los Angeles Department of Water and Power
MM-BIO-5 – Impacts to Nesting Birds	After construction activities are complete, vegetation shall be restored around the Ivanhoe Bypass Pipeline Plug site and all areas where vegetation was removed or disturbed as part of Project activities. Revegetation shall restore a 1:1 ratio of trees, shrubs, grasses, and low ground-cover species removed. Vegetation cover, diversity, and density shall be restored to conditions before Project construction. If construction of a new facility (e.g. Ivanhoe Bypass Pipeline Plug) does not allow for 1:1 revegetation or restoration equal to the area disturbed, revegetation shall occur near the new facility if feasible or where there is low or bare ground cover in the landscaped area that would provide ecological benefits to birds. The revegetation area shall be equal to or more than the total amount of area disturbed. Planting shall occur outside of bird nesting season. Monitor planting success or mortality and perform infill planting if needed.	After construction/ Project activities	Los Angeles Department of Water and Power
MM-BIO-6 – Special-Status Plant Survey	CDFW recommends conducting focused surveys for special-status plants on site and disclosing the results in the final environmental document. Based on the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (CDFW 2018), a qualified biologist shall “conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting.” The final CEQA documentation shall provide a thorough discussion on the presence/absence of sensitive plants on site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.	Prior to construction/ Project activities	Los Angeles Department of Water and Power

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Biological Resources (BIO)			
Mitigation Measure (MM)		Timing	Responsible Party
MM-BIO-7 – Impacts to Bats	To protect bats and roosts that may occur on site, CDFW recommends that the final environmental document include a measure that a qualified bat specialist conduct a pre-construction survey to identify trees and/or structures that could provide day and/or night-time roost sites for bats. Work activities shall not occur under the structure between 30 minutes before sunset and 30 minutes after sunrise. Work shall not occur within 100 feet of or directly under or adjacent to an active roost during the breeding season when young are present but are not yet ready to fly (generally April and August) (Johnston et al. 2004). CDFW recommends that the final environmental document include a measure that no construction shall occur between 30 minutes before sunset and 30 minutes after sunrise during the non-volant period between April and August if day-time roost sites are found.	Prior to and during construction/ Project activities	Los Angeles Department of Water and Power
MM-BIO-8 – Impacts to Birds and Wildlife –	CDFW recommends that the final environmental document include a measure to have a qualified biologist on site during draining and refilling of the Ivanhoe Reservoir to monitor for birds and could temporarily stop activities or regulate draining rate if necessary, to prevent bird mortality and injury to native aquatic species. The reservoir shall be drained completely, not left partially drained, to temporarily eliminate the Ivanhoe Reservoir as a stopover opportunity during Project activities.	During construction/ Project activities	Los Angeles Department of Water and Power

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