GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions & Hearings" and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **"Initial Submissions"**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.

- **"Secondary Submissions"**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.

- **"Day of Hearing Submissions"**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

Item No. 6

Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

June 25, 2026

TO: West Los Angeles Area Planning Commission

FROM: Kenton Trinh, City Planner

ADDITIONAL INFORMATION FOR CASE NO. PS-1464-1A; 5000 SOUTH BEETHOVEN STREET

The following documents are to be incorporated into the staff recommendation report to be considered at the West Los Angeles Area Planning Commission meeting of July 1, 2026, related to Item No. 6 on the meeting agenda:

- Exhibit I - CDFW Notification Review No. EPIMS-LAN-46551-R5
- The Memorandum dated June 5, 2026, submitted by the Applicant in response to the Appeal Points

EXHIBIT I –

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE LAKE OR STREAMBED ALTERATION NOTIFICATION REVIEW NO. EPIMS-LAN-46551-R5

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 437-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

BY U.S. MAIL AND EMAIL

September 24, 2024

Manny Kozar
23622 Calabasas Road, Suite 121
Calabasas, CA 91302
athenanvk@aol.com

Streambed Alteration Agreement Not Needed, EPIMS-LAN-46651-R5, 5000 Beethoven

Dear Manny Kozar:

The purpose of this letter is to inform you that while notification under Fish and Game Code section 1602 was required before beginning the project referenced above, and failing to do so constitutes a violation of this section, the California Department of Fish and Wildlife (CDFW) has determined that a streambed alteration agreement (agreement) is not required.

Background

On September 10, 2019, CDFW first became aware of a proposed project at 5000 Beethoven Street in the Palms – Mar Vista – Del Rey Community Plan Area of the City of Los Angeles. The proposed project, the Del Rey Pointe Residential Project, is located at the confluence of Ballona Creek and the Centinela Creek Channel and is located upstream of the Ballona Wetlands Ecological Reserve (project).

On October 11, 2019, CDFW commented on a Mitigated Negative Declaration (MND) for the project. (See Exhibit 1, CDFW Comments on Del Rey Pointe Residential Project MND.) Specifically, CDFW commented on the project's potential impacts to the Ballona Wetlands Ecological Reserve and state-owned property, as well as potential impacts to streams. Based on its review of the MND, CDFW advised that the project applicant must provide written notification to CDFW pursuant to Fish and Game Code section 1602 (notification) before beginning the project.

On May 11, 2022, CDFW received a report about a potential violation of the Fish and Game Code. On May 24, 2022, CDFW reached out to the reporting party to schedule a meeting to discuss the potential violation, and on May 26, 2022, CDFW met with the reporting party.

After the meeting, CDFW began coordinating with the Los Angeles County Department of Public Works to schedule a site visit and get access to the property. On June 8, 2022, Senior Environmental Scientist (Supervisory) Frederic (Fritz) Rieman and Warden

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Andreas Gilbert conducted a site visit to document potential violations of the Fish and Game Code. After the site visit, CDFW obtained the contact information for the property owner and their consultants.

On June 21, 2022, CDFW sent an email to Michael Vignieri, Manny Kozar, Ilan Israely, and Eugena Weng explaining that all construction activities that could impact streams at the project site must cease and any materials deleterious to fish and wildlife resources must not be placed within 150 feet of the streams in accordance with Fish and Game Code section 5650. In addition, CDFW advised that notification was required because the activities observed at the project site during CDFW's June 8, 2022, site visit would substantially change the bed, channel, or bank of Centinela Creek. CDFW also explained that the construction activities could result in the deposition of debris or waste into Centinela Creek in violation of Fish and Game Code section 5652. (See Exhibit 2, email RE: 5300 Beethoven Street/ Marina Island Bridge Project (4).) Finally, CDFW provided information on how to submit a notification by email to CDFW. (See Exhibit 3, email RE: 5300 Beethoven Street/ Marina Island Bridge Project (3).)

Multiple people including Michael Vignieri, Eugena Weng, Craig Fry, and Athena Novak confirmed receipt of CDFW's emails. (See Exhibit 4, email RE: 5300 Beethoven Street/ Marina Island Bridge Project; Exhibit 5, email RE: 5300 Beethoven Street/ Marina Island Bridge Project (2); Exhibit 6, email RE: 5300 Beethoven Street/ Marina Island Bridge (6); Exhibit 7, email RE: 5300 Beethoven Street/ Marina Island Bridge Project (7).) Mr. Rieman also spoke with Athena Novak by telephone on June 21, 2022, about the matter and the need to submit a notification to CDFW for the project. (See Exhibit 2, email RE: 5300 Beethoven Street/ Marina Island Bridge Project (4).)

On July 15, 2022, Mr. Rieman followed up on this matter by email. On the same day, Athena Novak responded by email that they would try to submit a notification for the project by the following week. (See Exhibit 4, email Re_ 5300 Beethoven Street_ Marina Island Bridge Project.) On August 1, 2022, Mr. Rieman followed up again on the notification. Athena Novak responded the same day that they would have the notification completed and ready for submittal the next day. (See Exhibit 8, email Re_ 5300 Beethoven Street_ Marina Island Bridge Project.) Throughout the rest of 2022, Mr. Rieman and Athena Novak had multiple telephone calls about the notification process under Fish and Game Code section 1602 and what information would be required for the notification to be complete.

On October 18, 2022, Mr. Rieman conducted another site visit to meet with the property owner, developer, contractors, and other permitting agencies for the project. Mr. Rieman reiterated that notification to CDFW pursuant to Fish and Game Code section 1602 was required for the project, all construction activities that could impact streams at the project site must cease, and placing deleterious materials within 150 feet of the streams must stop.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

On September 19, 2023, CDFW received reports that work was still occurring at the project site. On the same day, CDFW notified the City of Los Angeles's Department of Building and Safety, Bureau of Engineering, and Department of Planning that CDFW had not received a notification under Fish and Game Code section 1602 from the project proponent and to check on the status of the project.

In December 2023, CDFW received additional reports that work was still occurring at the project site. Environmental Scientist Andrew Aitken and Warden Gilbert investigated potential violations of the Fish and Game Code.

On December 12, 2023, CDFW issued a notice of violation of Fish and Game Code section 1602 (NOV) for beginning the project without first notifying CDFW as section 1602 requires. The NOV instructed that any project-related activities on the property cease and an after-the-fact notification for the project be submitted to CDFW. (See Exhibit 8, 1600-2023-9029-R5 Notice of Violation of Fish and Game Code Section 1602.)

Notification

On December 15, 2023, CDFW received your notification through CDFW's Environmental Permit Information Management System (EPIMS). On January 16, 2024, CDFW determined that your notification was incomplete because the information on one or more of the forms below was either missing or insufficient. This included listing the incorrect applicant, an inconsistent project description, not providing a feasible work period, not adequately describing project impacts, and not providing referenced technical studies.

On February 2, 2024, CDFW received a notification for emergency work.

On May 2, 2024, the notification was re-submitted via EPIMS for CDFW review.

On May 24, 2024, the 30-day review period for the notification was mutually extended from June 3, 2024, to July 3, 2024, by email correspondence. (See Exhibit 9, email RE LAN-46651 - 5000 Beethoven Extension_1.) The purpose of the extension was to give the applicant time to address the missing or insufficient information in the notification.

On June 21, 2024, CDFW had a virtual meeting with Ilan Israely and Athena Novak to discuss the information in the notification. The notification still had incorrect applicant information, a conflicting project description, and inconsistent potential impacts.

On June 28, 2024, the 30-day review period was mutually extended a second time from July 3, 2024, to August 2, 2024. (See Exhibit 10 EPIMS-LAN-46651-

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

R5_Notification_Extension_2.) This was done again to give the applicant time to address the missing or insufficient information in the notification.

On July 17, 2024, CDFW unlocked the notification in EPIMS so Athena Novak could correct the notification.

On July 24, 2024, CDFW reminded Athena Novak by email to correct the items discussed during the virtual meeting on June 21, 2024.

On July 28, 2024, the 30-day review period was mutually extended a third time from August 2, 2024, to August 30, 2024. (See Exhibit 11, EPIMS-LAN-46651-R5_Notification_Extension_3.) This was done again to give the applicant time to address the missing or insufficient information in the notification.

On August 14, 2024, the notification was re-submitted to CDFW for review.

On August 30, 2024, eight months after receiving the original notification, the notification was finally deemed complete.

No Agreement Required

CDFW is required to submit a draft agreement to the project applicant within sixty calendar days from the date the applicant's notification is deemed complete if CDFW determines an agreement is required for the project. An agreement will be required if CDFW determines the project could substantially adversely affect an existing fish or wildlife resource.

Your notification was deemed complete on August 30, 2024. Therefore, CDFW has until October 29, 2024, to issue you a draft agreement or inform you that an agreement is not required.

CDFW has reviewed your now complete notification and has determined that the project described therein will not substantially adversely affect an existing fish or wildlife resource. As a result, while you were required to submit a notification for your project, and failing to do so before beginning your project constitutes a violation of Fish and Game Code section 1602, an agreement is not required for your project. You are still responsible for complying with all applicable local, state, and federal laws to complete your project.

Please note that project must be the same as described in the now complete notification and conducted in the same manner as specified therein. This includes completing the project by capping the piles and repaving the road within the seasonal work period and term and implementing all avoidance and mitigation measures to protect fish and wildlife

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

resources, as specified in the notification. Beginning or completing a project different than the one described in your notification may constitute a violation of Fish and Game Code section 1602. In addition, if you do not complete your project before the term in your notification has expired at the end of this year, you will need to re-notify CDFW before you may continue your project.

A copy of this letter and your notification with all attachments should be available at the project site at all times.

If you have questions regarding this letter, please contact Andrew Aitken at (562) 525-9688 or by email at andrew.aitken@wildlife.ca.gov.

Sincerely,

DocuSigned by:
5991E19EF8094C3...
Victoria Tang
Environmental Program Manager

ec: California Department of Fish and Wildlife

Andrew Aitken, Environmental Scientist
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisor)
South Coast Region
R5LakeandStreambed@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 1. CDFW Comments on Del Rey Pointe Residential Project MND

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

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

October 11, 2019

Ms. Connie Chauv
Los Angeles City Planning Department
200 N. Spring Street, Room 750
Los Angeles, CA 90012
connie.chauv@lacity.org

Subject: Mitigated Negative Declaration for the Del Rey Pointe Residential Project, City of Los Angeles, Los Angeles County

Dear Ms. Chauv:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the Del Rey Pointe Residential 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 & Game Code, §§ 711.7, subdivision (a) & 1802; Public 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 (Public 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 & Game 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 & Game Code, § 2050 *et seq.*), or State-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Project Description and Summary

Objective: The Project proposes to develop a multi-family residential project consisting of 236 residential apartment units with a total of 406 parking spaces, provided in one level of subterranean parking, one level of semi-subterranean parking, and on-grade parking. In addition, a pedestrian/bicycle bridge is proposed to connect the existing Ballona Creek Bikeway on the north to the subject site and proposed vehicular bridge to the south. The Project includes two natural habitat preserves on the westerly and easterly portions of the lot and a linear park with pedestrian and bicycle paths along the perimeter of the site. The Project involves export of approximately 31,430 cubic yards of soil and the removal of one non-protected on-site tree. The Project also involves the extension of utilities and other infrastructure including roads, sewer, and storm drains to serve the subject site.

Location: The Project site is located at 5000 Beethoven Street in the Palms - Mar Vista - Del Rey Community Plan Area of the City of Los Angeles. The approximately 121,493 square foot triangular-shaped site is located on a peninsula bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south and vacant land to the east. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the site to the northeast. The Ballona Wetlands Ecological Reserve is located in adjacent parcels immediately southwest of the Project site, partially encompassing a portion of Ballona Creek that abuts the Project site boundary.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City of Los Angeles (City) in adequately identifying, avoiding 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.

Project Description and Related Impact Shortcoming

Comment #1: Impacts to State owned property

Issue: The proposed Project site is proposed to be located adjacently to Ballona Wetlands Ecological Reserve (BWER), which is CDFW managed State property. However, the Los Angeles County Parcel Map indicates that the boundary of BWER may overlap with a portion of the Project site (see Attachment #1).

Specific impact: The adjacent approximate 577-acre Ballona Wetlands Ecological Reserve (BWER) property is under State management as an ecological reserve intended to protect numerous CESA-listed species. BWER is a tidally supported ecosystem that relies on the influx of both fresh and saltwater. Project related activities may directly or indirectly impact the quality of the habitat found in BWER, Centinela Creek, and Ballona Creek through the loss of habitat or release of deleterious materials into adjacent habitat.

In addition, the uncertainty of Project boundaries in relation to State property could lead to the Project proponent trespassing onto State land and violating State regulations related to ecological reserves.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Why impact would occur: Project related activities may trespass onto State land and result in the loss of State land and protected wildlife habitat. Project implementation includes grading, excavation, construction, vegetation clearing, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species. "[I]t is unlawful to enter upon any ecological reserves established under the provisions of this article, or to take therein any bird or the nest or eggs thereof, or any mammal, fish, mollusks, crustaceans, amphibia, reptiles or any other form of plant or animal life" (Fish & Game Code, § 1583).

Evidence impact would be significant: CDFW has a responsibility "to protect threatened or endangered native plants, wildlife, or aquatic organisms or specialized habitat types, both terrestrial and nonmarine aquatic, or large heterogeneous natural gene pools for the future use of mankind through the establishment of ecological reserves (Fish & Game Code, § 1580). As mentioned above, the potential trespass onto State land would adversely affect CDFW's ability to implement its statutory mandate to protect species and habitats that ecological reserves are intended to conserve. Accordingly, CDFW opposes any Project activities if they would take place within the boundaries of BWER.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends that the Project proponent conduct parcel surveys to confirm the title and legal boundaries of the property and to share that information with CDFW. If surveys reveal the Project would occur on State land, the Project must be revised to avoid that area and include sufficient buffers as determined during discussion with CDFW. No Project activities, including buffers, roads, staging areas, or vegetation clearing, will be authorized within CDFW lands.

Comment #2: Impacts to Streams

Issue: CDFW is concerned that the Project location supports streams subject to notification under Fish and Game Code section 1600 *et seq.* According to site plans provided in support of the proposed Project, there is a bridge proposed to be built on pre-existing piers across Ballona Creek as part of this Project. Also, bike and pedestrian paths are expected to be constructed along the periphery of the Project site. The Project site abuts both Ballona Creek and Centinela Creek, meaning that trail construction will take place along the banks of these channels.

Issue: Based on the location of the Project site, at the confluence of Centinela Creek and Ballona Creek, and the fact that the channels are soft-bottomed at that location, it is believed that the subsurface flow between the two creeks may be hydrologically connected. With significant Project activities involving underground work and the proximity to these channels, CDFW has concerns about Project runoff affecting water quality in the immediate area.

Specific impacts: The Project may result in the loss of streams and associated watershed function and biological diversity. Grading and construction activities will likely alter the topography, and thus the hydrology, of the Project site

Why impacts would occur: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream streams and associated biological resources beyond the Project development footprint may also be impacted

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW has concluded that the Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at www.wildlife.ca.gov/habcon/1600.

CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. However, the MND does not meet CDFW's standard at this time. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Mitigation Measure #2: Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity.

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 the Lead Agency 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 & Game Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines; § 15073(e)]. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov or (562) 342-2142.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

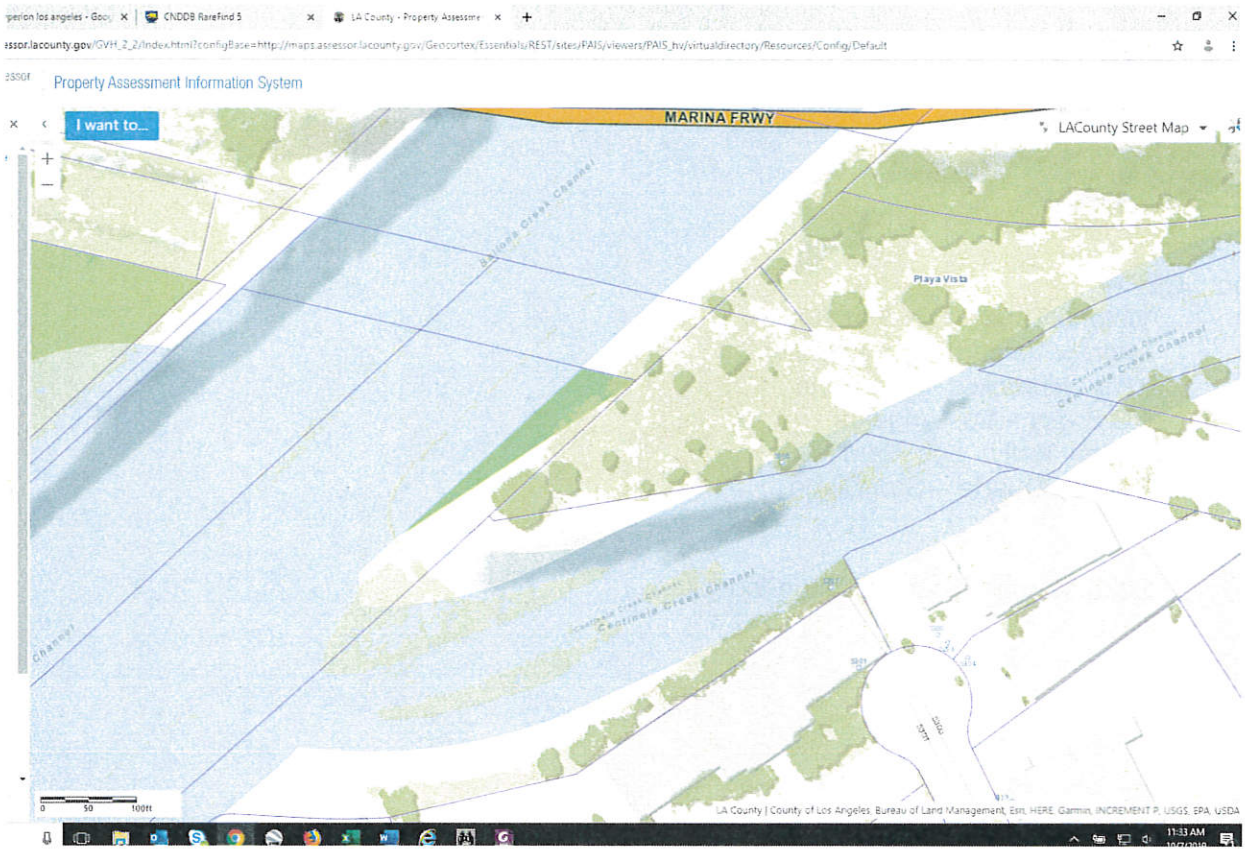
Sincerely,

Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Andrew Valand – Los Alamitos
Kelly Schmoker - Pasadena
RC Brody – Los Angeles
Audrey Kelly - Los Alamitos
Dolores Duarte – San Diego

Scott Morgan (State Clearinghouse)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD



Attachment 1: An image of parcel boundaries taken from the Los Angeles County Office of the Assessor website: www.maps.assessor.lacounty.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 2. RE_ 5300 Beethoven Street_ Marina Island Bridge Project (4)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From:	Rieman, Frederic@Wildlife
To:	Tang, Victoria@Wildlife; 'Eugena Weng'; 'Michael Vignieri'; 'Ilan Israely'; silvia@summerlandpartners.com; 'Manny Kozar'; 'Ilan Israely'; Gilbert, Andreas@Wildlife; athenanvk@aol.com; craigfry@craigfryandassociates.com;
Cc:	
Subject:	RE: 5300 Beethoven Street/ Marina Island Bridge Project
Sent:	6/21/2022 4:41:00 PM

Good afternoon everyone,
I would like to reiterate Victoria's comments and address Eugena's email. CDFW does not have a record of a Lake or Streambed Alteration Notification for the work that has already occurred or for any future proposals. Do not disregard this email. We need to resolve this matter.
I appreciate the enthusiasm for which you are all responding to my email; however, I am getting multiple emails and phone calls regarding this matter. Let's keep one email thread going to address this matter.
Athena, thank you for calling me regarding this matter. As we discussed, I am going to send out an email with advice on how to submit a Notification for Lake or Streambed Alteration via our online permitting portal (EPIMS). That email will be coming out shortly. Feel free to contact me if you have any questions about how to submit a Notification and what materials are required.
Craig, I've seen the work that has been started. There are multiple pilings that have been installed. As I understand it, a pre-fabricated bridge would then be installed that would fully span the Centinela Creek Channel. This is not my project so I am not as familiar with the ins and outs of it as you all are. You are proposing to build a bridge that will at the bare minimum impact the channel in perpetuity through the effect of shading. In addition, during construction there may be impacts to the channel while the bridge is being installed. Please submit a Notification for Lake or Streambed Alteration. This Notification provides you the opportunity to fully describe the project, any potential impacts, and any avoidance/minimization measures you are proposing to avoid unnecessary impacts to fish and wildlife resources.
As I said, please keep all communication on this thread. I look forward to working with you all on this.
Thank you,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

From: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Sent: Tuesday, June 21, 2022 4:21 PM
To: 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>; Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Hi folks,
It looks like Fritz was accidentally removed from this e-mail chain. Please note that we do not have a record of a Lake or Streambed Alteration Notification for this work (for the activities that have already occurred and for any future proposals) at this time. I do not recognize a person named Athena. The CDFW contact for reviewing and resolving the Lake and Streambed Alteration Notification issue would be Fritz and our team. At this point in time, we have not resolved any issues for this project yet.
Please make sure to coordinate with Fritz for any review/approval/requirements.
Thank you.
Victoria Tang (She/Her)
Temporary Number: (562) 233-6324

From: Eugena Weng <eugena_weng@hotmail.com>
Sent: Tuesday, June 21, 2022 5:29 PM
To: 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Some people who received this message don't often get email from eugena_weng@hotmail.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Michael,
Pls disregard the email from Dept of Fish and Wildlife per Ilan.
Ilan has spoken to Athena and issue is resolved.
Thanks,
Eugena

From: Michael Vignieri [mailto:michaelvignieri@gmail.com]
Sent: Tuesday, June 21, 2022 3:43 PM
To: Ilan Israely
Cc: Eugena Weng; silvia@summerlandpartners.com; Manny Kozar; Ilan Israely; Gilbert, Andreas@Wildlife; Tang, Victoria@Wildlife
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project

Ilan & Manny,
I believe that Fish & Game was initially as part of the review process with the permit and conditions may already have been included….I'll see what I have in my archives tomorrow and then we can discuss how best to respond…….m.

On Jun 21, 2022, at 2:14 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:
Good afternoon everyone,

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW.

Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:

1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake

In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.

It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.

FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials

As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.

Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do and what information would be required in the Notification.

Thank you,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 3. RE_ 5300 Beethoven Street_ Marina Island Bridge Project (3)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From:	Rieman, Frederic@Wildlife
To:	Tang, Victoria@Wildlife; 'Eugena Weng'; 'Michael Vignieri'; 'Ilan Israely';
Cc:	silvia@summerlandpartners.com; 'Manny Kozar'; 'Ilan Israely'; Gilbert, Andreas@Wildlife; athenanvk@aol.com; craigfry@craigfryandassociates.com;
Subject:	RE: 5300 Beethoven Street/ Marina Island Bridge Project
Attachments:	LSA Fee Schedule_2022.pdf;EPIMS Check Money Order Form_72020.pdf;EPIMS External Permitting Portal User Instructions_FINAL.pdf;EPIMS Flyer New Opportunities.pdf;CommonCausesforDelayedIssuance.pdf;
Sent:	6/21/2022 4:43:00 PM

Good afternoon everyone,
Here is some information about how to fill out a Notification for Lake or Streambed Alteration and our new website for submitting Notifications.
Here is the link to our webpage:
https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS#55502820-permitting-portal
When you go on there, you will want to click the link to the “Permitting and Document Repository Portal” which will take you to a login page. You will have to register, so when you get to the login page click the “Register” link to the right of the page. When you have completed your registration then go ahead and log in.
When you are logged in you should see a button that says Click on “Apply for a Permit.” Click that and then click start a new application under the “Notify for Standard Agreement”.
From there you will be shown a list of “Application forms” which you can edit piece by piece.
If you have trouble with the EPIMS site, there is a help desk that should be staffed during business hours that is available to help you. You can contact them by email at EPIMSHELP@wildlife.ca.gov. They are the experts and they will be able to help you better than most people in our Region.
Please work to fill out each section to the best of your ability. The most important part of the notification would be to provide a full written description of the “project”. Relevant attachments, such as maps, and pictures or other documentation can also be included to help give a good picture of what the project is.
A Lake or Streambed Alteration Agreement is a type of permit that includes measures necessary to protect existing fish and wildlife resources. Common activities that are permitted by LSA Agreements include installation, repair, or maintenance of water diversions, culverts, stream crossings (e.g., bridges, rock fords), or any other modification of a lake or stream's bed, bank, or channel including extraction of material from them (i.e., sand, rock, or gravel) or deposition of material into them.
After your team prepares and submits your LSA Notification, CDFW will carefully review it and respond within 30 days in one of the following manners:

A. No Streambed Alteration Agreement needed: if CDFW determines that the activity described in the Notification will not substantially adversely affect an existing fish or wildlife resource, then CDFW will issue a letter to that effect. The activity might still be subject to regulations under the jurisdiction of other agencies such as USACE, USFWS, RWQCB, NOAA, etc.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

B. Notification Incomplete: if CDFW determines that the Notification is incomplete, then CDFW will issue a letter to that effect describing the missing items. In my experience, incomplete Notifications did not sufficiently describe the project activities or project impacts. It is very helpful to provide detailed maps, diagrams, aerial imagery, design drawings, biological and vegetation survey reports, hydrological reports, geotechnical reports, etc. as relevant information. Another common cause for incomplete Notifications is insufficient fees. Be sure to check the current fee schedule. Each independent "activity" described in the Notification is counted as a "Project" for fee calculation purposes. The applicant is welcome to resubmit the Notification after this.
C. Notification Complete: if CDFW determines that the Notification is complete, then CDFW will issue a letter to that effect and begin drafting a Lake or Streambed Alteration Agreement. CDFW will respond to the applicant with this draft Agreement within 60 days. After the applicant signs the Agreement, CDFW will conduct a review of CEQA compliance and then execute the Agreement. CDFW will continue to monitor compliance with the protective measures detailed in the Agreement.

The notification form is made to cover all sorts of projects, so if you have any questions on how to fill it out (content wise), feel free to ask me. I've also provided some links to guide you through the application process:
Here is the link to the LSA notification page:
https://www.wildlife.ca.gov/Conservation/LSA/Notify-CDFW
Here is the associated fee schedule, yours will be a **standard agreement** or a **routine maintenance base fee** depending on what you chose:
http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=175309&inline
And here is the link to the instructions manual which describes what details to include in the notification:
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3773&inline
And here are some FAQs:
https://www.wildlife.ca.gov/Conservation/LSA/Q-and-A
I have also attached the following documents:
-Our 2022 fee schedule
-The money order form you include if you mail a check to our San Diego office instead of paying by credit card on EPIMS (Please address the envelope to the Lake and Streambed Alteration Program)
-Instructions for using EPIMS
-A flyer about EPIMS and our helpdesk
-Common causes for delayed issuance of an Agreement
If you have any questions about how to submit a Notification for Lake or Streambed Alteration, please feel free to reach out to me.
Warmly,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

From: Rieman, Frederic@Wildlife
Sent: Tuesday, June 21, 2022 4:42 PM
To: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; athenanvk@aol.com; craigfry@craigfryandassociates.com
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Good afternoon everyone,

I would like to reiterate Victoria's comments and address Eugena's email. CDFW does not have a record of a Lake or Streambed Alteration Notification for the work that has already occurred or for any future proposals. Do not disregard this email. We need to resolve this matter.

I appreciate the enthusiasm for which you are all responding to my email; however, I am getting multiple emails and phone calls regarding this matter. Let's keep one email thread going to address this matter.

Athena, thank you for calling me regarding this matter. As we discussed, I am going to send out an email with advice on how to submit a Notification for Lake or Streambed Alteration via our online permitting portal (EPIMS). That email will be coming out shortly. Feel free to contact me if you have any questions about how to submit a Notification and what materials are required.

Craig, I've seen the work that has been started. There are multiple pilings that have been installed. As I understand it, a pre-fabricated bridge would then be installed that would fully span the Centinela Creek Channel. This is not my project so I am not as familiar with the ins and outs of it as you all are. You are proposing to build a bridge that will at the bare minimum impact the channel in perpetuity through the effect of shading. In addition, during construction there may be impacts to the channel while the bridge is being installed. Please submit a Notification for Lake or Streambed Alteration. This Notification provides you the opportunity to fully describe the project, any potential impacts, and any avoidance/minimization measures you are proposing to avoid unnecessary impacts to fish and wildlife resources.

As I said, please keep all communication on this thread. I look forward to working with you all on this.

Thank you,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

From: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Sent: Tuesday, June 21, 2022 4:21 PM
To: 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri'

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

<michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>; Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Hi folks,
It looks like Fritz was accidentally removed from this e-mail chain. Please note that we do not have a record of a Lake or Streambed Alteration Notification for this work (for the activities that have already occurred and for any future proposals) at this time. I do not recognize a person named Athena. The CDFW contact for reviewing and resolving the Lake and Streambed Alteration Notification issue would be Fritz and our team. At this point in time, we have not resolved any issues for this project yet.
Please make sure to coordinate with Fritz for any review/approval/requirements.
Thank you.
Victoria Tang (She/Her)
Temporary Number: (562) 233-6324

From: Eugena Weng <eugena_weng@hotmail.com>
Sent: Tuesday, June 21, 2022 5:29 PM
To: 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Some people who received this message don't often get email from eugena_weng@hotmail.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Michael,
Pls disregard the email from Dept of Fish and Wildlife per Ilan.
Ilan has spoken to Athena and issue is resolved.
Thanks,
Eugena

From: Michael Vignieri [mailto:michaelvignieri@gmail.com]
Sent: Tuesday, June 21, 2022 3:43 PM
To: Ilan Israely
Cc: Eugena Weng; silvia@summerlandpartners.com; Manny Kozar; Ilan Israely; Gilbert, Andreas@Wildlife; Tang, Victoria@Wildlife
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project

Ilan & Manny,
I believe that Fish & Game was initially as part of the review process with the permit and conditions may already have been included….I'll see what I have in my archives tomorrow and then we can discuss how best to respond…….m.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

On Jun 21, 2022, at 2:14 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:

Good afternoon everyone,

My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW.

Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:

1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake

In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.

It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.

FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials

As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.

Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do and what information would be required in the Notification.

Thank you,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 4. RE 5300 Beethoven Street Marina Island Bridge Project

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From: Athena Novak
To: Rieman, Frederic@Wildlife
Cc: Tang, Victoria@Wildlife; Manny Kozar; eugena_weng@hotmail.com; ilan@ophirrf.com;
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project
Sent: 8/1/2022 5:03:06 PM

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello Fritz - Yes it was nice but went by to fast. I had my family in from Mt. Shasta and took a few extra days off to spend with them. But back to work as they say. Okay I am almost done. The Application Number is: 31652.

I have to finish the Environmental. I was on hold for a few days waiting for my co worker to send me documents and information. I received them on Friday to complete that section. That leaves the Documents and Maps and Fees to complete and submit.

I should have it completed and ready for submittal by tomorrow.

Your kind understanding is very much needed and always very much appreciated.

Best, Athena Novak
Phone: (818) 906-7449

On Aug 1, 2022, at 2:00 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Good afternoon Athena,
Hope you had a pleasant weekend. Just following up on this matter. Could you please provide a status update and the 5-digit Notification Number for the Notification you are working on?
Thank you,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

---

From: Athena Novak <athenanvk@aol.com>
Sent: Friday, July 15, 2022 8:46 AM
To: Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Cc: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; slpg888@gmail.com; eugena_weng@hotmail.com; ilan@ophirrf.com
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello - I hope you are having a great Friday morning. The site and application process is quite complicated. We have been working on it and trying to navigate through the portal the best we can. I have called for teck assistance. My goal is to have it done and submitted by next week. Best, Athena Novak

---

From: Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Sent: Friday, July 15, 2022 8:04 AM
To: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; Ilan Israely <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; Ilan Israely <ilan@ophirrf.com>; athenanvk@aol.com; craigfry@craigfryandassociates.com
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project
Good morning everyone,
Just following up on this matter. How is the Notification coming along and do you have any questions?
Warmly,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

---

From: Rieman, Frederic@Wildlife
Sent: Tuesday, June 21, 2022 4:44 PM
To: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: 'silvia@summerlandpartners.com' <silvia@summerlandpartners.com>; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; 'athenanvk@aol.com' <athenanvk@aol.com>; 'craigfry@craigfryandassociates.com' <craigfry@craigfryandassociates.com>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project
Good afternoon everyone,
Here is some information about how to fill out a Notification for Lake or Streambed Alteration and our new website for submitting Notifications.
Here is the link to our webpage:
https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS#55502820-permitting-portal
When you go on there, you will want to click the link to the "Permitting and Document Repository Portal" which will take you to a login page. You will have to register, so when you get to the login page click the "Register" link to the right of the page. When you have completed your registration then go ahead and log in.
When you are logged in you should see a button that says Click on "Apply for a Permit." Click that and then click start a new application under the "Notify for Standard Agreement".
From there you will be shown a list of "Application forms" which you can edit piece by piece.
If you have trouble with the EPIMS site, there is a help desk that should be staffed during business hours that is available to help you. You can contact them by email at EPIMSHELP@wildlife.ca.gov. They are the experts and they will be able to help you better than most people in our Region.
Please work to fill out each section to the best of your ability. The most important part of the notification would be to provide a full written description of the "project". Relevant attachments, such as maps, and pictures or other documentation can also be included to help give a good picture of what the project is.
A Lake or Streambed Alteration Agreement is a type of permit that includes measures necessary to protect existing fish and wildlife resources. Common activities that are permitted by LSA Agreements include installation, repair, or maintenance of water diversions, culverts, stream crossings (e.g., bridges, rock fords), or any other modification of a lake or stream's bed, bank, or channel including extraction of material from them (i.e., sand, rock, or gravel) or deposition of material into them.
After your team prepares and submits your LSA Notification, CDFW will carefully review it and respond within 30 days in one of the following manners:

A. No Streambed Alteration Agreement needed: if CDFW determines that the activity described in the Notification will not substantially adversely affect an existing fish or wildlife resource, then CDFW will issue a letter to that effect. The activity might still be subject to regulations under the jurisdiction of other agencies such as USACE, USFWS, RWQCB, NOAA, etc.

B. Notification Incomplete: if CDFW determines that the Notification is incomplete, then CDFW will issue a letter to that effect describing the missing items. In my experience, incomplete Notifications did not sufficiently describe the project activities or project impacts. It is very helpful to provide detailed maps, diagrams, aerial imagery, design drawings, biological and vegetation survey reports, hydrological reports, geotechnical reports, etc. as relevant information. Another common cause for incomplete Notifications is insufficient fees. Be sure to check the current fee schedule. Each independent "activity" described in the Notification is counted as a "Project" for fee calculation purposes. The applicant is welcome to resubmit the Notification after this.

C. Notification Complete: if CDFW determines that the Notification is complete, then CDFW will issue a letter to that effect and begin drafting a Lake or Streambed Alteration Agreement. CDFW will respond to the applicant with this draft Agreement within 60 days. After the applicant signs the Agreement, CDFW will conduct a review of CEQA compliance and then execute the Agreement. CDFW will continue to monitor compliance with the protective measures detailed in the Agreement.

The notification form is made to cover all sorts of projects, so if you have any questions on how to fill it out (content wise), feel free to ask me. I've also provided some links to guide you through the application process:
Here is the link to the LSA notification page:
https://www.wildlife.ca.gov/Conservation/LSA/Notify-CDFW
Here is the associated fee schedule, yours will be a **standard agreement** or a **routine maintenance base fee** depending on what you chose:
http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=175309&inline
And here is the link to the instructions manual which describes what details to include in the notification:
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3773&inline
And here are some FAQs:
https://www.wildlife.ca.gov/Conservation/LSA/Q-and-A
I have also attached the following documents:
-Our 2022 fee schedule
-The money order form you include if you mail a check to our San Diego office instead of paying by credit card on EPIMS (Please address the envelope to the Lake and Streambed Alteration Program)
-Instructions for using EPIMS
-A flyer about EPIMS and our helpdesk
-Common causes for delayed issuance of an Agreement
If you have any questions about how to submit a Notification for Lake or Streambed Alteration, please feel free to reach out to me.
Warmly,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From: Rieman, Frederic@Wildlife
Sent: Tuesday, June 21, 2022 4:42 PM
To: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; athenanvk@aol.com; craigfry@craigfryandassociates.com
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Good afternoon everyone,
I would like to reiterate Victoria's comments and address Eugena's email. CDFW does not have a record of a Lake or Streambed Alteration Notification for the work that has already occurred or for any future proposals. Do not disregard this email. We need to resolve this matter.
I appreciate the enthusiasm for which you are all responding to my email; however, I am getting multiple emails and phone calls regarding this matter. Let's keep one email thread going to address this matter.
Athena, thank you for calling me regarding this matter. As we discussed, I am going to send out an email with advice on how to submit a Notification for Lake or Streambed Alteration via our online permitting portal (EPIMS). That email will be coming out shortly. Feel free to contact me if you have any questions about how to submit a Notification and what materials are required.
Craig, I've seen the work that has been started. There are multiple pilings that have been installed. As I understand it, a pre-fabricated bridge would then be installed that would fully span the Centinela Creek Channel. This is not my project so I am not as familiar with the ins and outs of it as you all are. You are proposing to build a bridge that will at the bare minimum impact the channel in perpetuity through the effect of shading. In addition, during construction there may be impacts to the channel while the bridge is being installed. Please submit a Notification for Lake or Streambed Alteration. This Notification provides you the opportunity to fully describe the project, any potential impacts, and any avoidance/minimization measures you are proposing to avoid unnecessary impacts to fish and wildlife resources.
As I said, please keep all communication on this thread. I look forward to working with you all on this.
Thank you,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

From: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Sent: Tuesday, June 21, 2022 4:21 PM
To: 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>; Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Hi folks,
It looks like Fritz was accidentally removed from this e-mail chain. Please note that we do not have a record of a Lake or Streambed Alteration Notification for this work (for the activities that have already occurred and for any future proposals) at this time. I do not recognize a person named Athena. The CDFW contact for reviewing and resolving the Lake and Streambed Alteration Notification issue would be Fritz and our team. At this point in time, we have not resolved any issues for this project yet.
Please make sure to coordinate with Fritz for any review/approval/requirements. Thank you.
Victoria Tang (She/Her)
Temporary Number: (562) 233-6324

From: Eugena Weng <eugena_weng@hotmail.com>
Sent: Tuesday, June 21, 2022 5:29 PM
To: 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Some people who received this message don't often get email from eugena_weng@hotmail.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Michael,
Pls disregard the email from Dept of Fish and Wildlife per Ilan.
Ilan has spoken to Athena and issue is resolved.
Thanks,
Eugena

From: Michael Vignieri [mailto:michaelvignieri@gmail.com]
Sent: Tuesday, June 21, 2022 3:43 PM
To: Ilan Israely
Cc: Eugena Weng; silvia@summerlandpartners.com; Manny Kozar; Ilan Israely; Gilbert, Andreas@Wildlife; Tang, Victoria@Wildlife
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project

Ilan & Manny,
I believe that Fish & Game was initially as part of the review process with the permit and conditions may already have been included….I'll see what I have in my archives tomorrow and then we can discuss how best to respond…….m.

On Jun 21, 2022, at 2:14 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:

Good afternoon everyone,
My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW.
Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:
1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake
In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.
It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.
FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials
As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.
Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do and what information would be required in the Notification.
Thank you,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 5. RE_ 5300 Beethoven Street_ Marina Island Bridge Project (2)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From:	Tang, Victoria@Wildlife
To:	'Athena Novak'; Rieman, Frederic@Wildlife;
Cc:	ilan@ophirrf.com
Subject:	RE: 5300 Beethoven Street/ Marina Island Bridge Project
Attachments:	RE: 5300 Beethoven Street/ Marina Island Bridge Project
Sent:	6/23/2022 8:17:30 AM

Hi Athena,
You should have already received Fritz's email with directions on submitting a Notification (attached) – you are in the CC list. Please doublecheck your spam/junk folders to see if (and make sure) Fritz's future emails don't get misplaced. Thanks.
Victoria Tang (She/Her)
Temporary Number: (562) 233-6324

From: Athena Novak <athenanvk@aol.com>
Sent: Thursday, June 23, 2022 8:00 AM
To: Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Cc: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; ilan@ophirrf.com
Subject: Fwd: 5300 Beethoven Street/ Marina Island Bridge Project

You don't often get email from athenanvk@aol.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello - I hope you are having a wonderful Thursday morning. I am on standby for your email on the guiltiness and direction to submit a Notification for Lake or Streamed Alteration. Once I receive the email I will work on the submittal right a way.
Best, Athena Novak
AHN & Associates, LLC
4924 Balboa Blvd. Suite 518
Encino, CA 91316
W: (818) 906-7449
C: (818) 430-0552
E: Athenanvk@aol.com
www.ahnlanduse.com
Ms. Athena Novak
Time is like a river. You cannot touch the same water twice, because the flow that has passed will never pass again. Enjoy every moment of your life.

From: Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Sent: Tuesday, 21 June 2022 4:42 pm
To: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; Ilan Israely <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; Ilan Israely <ilan@ophirrf.com>;

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; athenanvk@aol.com; craigfry@craigfryandassociates.com
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project
Good afternoon everyone,
I would like to reiterate Victoria's comments and address Eugena's email. CDFW does not have a record of a Lake or Streambed Alteration Notification for the work that has already occurred or for any future proposals. Do not disregard this email. We need to resolve this matter.
I appreciate the enthusiasm for which you are all responding to my email; however, I am getting multiple emails and phone calls regarding this matter. Let's keep one email thread going to address this matter.
Athena, thank you for calling me regarding this matter. As we discussed, I am going to send out an email with advice on how to submit a Notification for Lake or Streambed Alteration via our online permitting portal (EPIMS). That email will be coming out shortly. Feel free to contact me if you have any questions about how to submit a Notification and what materials are required.
Craig, I've seen the work that has been started. There are multiple pilings that have been installed. As I understand it, a pre-fabricated bridge would then be installed that would fully span the Centinela Creek Channel. This is not my project so I am not as familiar with the ins and outs of it as you all are. You are proposing to build a bridge that will at the bare minimum impact the channel in perpetuity through the effect of shading. In addition, during construction there may be impacts to the channel while the bridge is being installed. Please submit a Notification for Lake or Streambed Alteration. This Notification provides you the opportunity to fully describe the project, any potential impacts, and any avoidance/minimization measures you are proposing to avoid unnecessary impacts to fish and wildlife resources.
As I said, please keep all communication on this thread. I look forward to working with you all on this.
Thank you,
Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

---

From: Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Sent: Tuesday, June 21, 2022 4:21 PM
To: 'Eugena Weng' <eugena_weng@hotmail.com>; 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>; Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project
Hi folks,
It looks like Fritz was accidentally removed from this e-mail chain. Please note that we do not have a record of a Lake or Streambed Alteration

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Notification for this work (for the activities that have already occurred and for any future proposals) at this time. I do not recognize a person named Athena. The CDFW contact for reviewing and resolving the Lake and Streambed Alteration Notification issue would be Fritz and our team. At this point in time, we have not resolved any issues for this project yet.
Please make sure to coordinate with Fritz for any review/approval/requirements. Thank you.
Victoria Tang (She/Her)
Temporary Number: (562) 233-6324

From: Eugena Weng <eugena_weng@hotmail.com>
Sent: Tuesday, June 21, 2022 5:29 PM
To: 'Michael Vignieri' <michaelvignieri@gmail.com>; 'Ilan Israely' <ilan@ophirrf.com>
Cc: silvia@summerlandpartners.com; 'Manny Kozar' <manny@summerlandpartners.com>; 'Ilan Israely' <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Subject: RE: 5300 Beethoven Street/ Marina Island Bridge Project

Some people who received this message don't often get email from eugena_weng@hotmail.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Michael,
Pls disregard the email from Dept of Fish and Wildlife per Ilan.
Ilan has spoken to Athena and issue is resolved.
Thanks,
Eugena

From: Michael Vignieri [mailto:michaelvignieri@gmail.com]
Sent: Tuesday, June 21, 2022 3:43 PM
To: Ilan Israely
Cc: Eugena Weng; silvia@summerlandpartners.com; Manny Kozar; Ilan Israely; Gilbert, Andreas@Wildlife; Tang, Victoria@Wildlife
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project

Ilan & Manny,
I believe that Fish & Game was initially as part of the review process with the permit and conditions may already have been included….I'll see what I have in my archives tomorrow and then we can discuss how best to respond…….m.

On Jun 21, 2022, at 2:14 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:
Good afternoon everyone,
My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW.
Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake

In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.

It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.

FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials

As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.

Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do and what information would be required in the Notification.

Thank you,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 6. RE_ 5300 Beethoven Street_ Marina Island Bridge Project (6)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From: Athena Novak
To: Rieman, Frederic@Wildlife
Subject: Re: 5300 Beethoven Street/ Marina Island Bridge Project
Sent: 6/21/2022 4:05:36 PM

You don't often get email from athenanvk@aol.com. Learn why this is important

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello Frederic - It was wonderful talking to you today. Please may I ask if you can send me the information package and direction on what is required for the submittal to CDFW. Please find below my signature block with my office and cell phone number if you wish to call me and or I am always accessible via email. Your kind help with guiding us thought process will be very much needed and appreciated.

Best, Athena Novak

AHN & Associates, LLC
4924 Balboa Blvd. Suite 518
Encino, CA 91316
W: (818) 906-7449
C: (818) 430-0552
E: Athenanvk@aol.com
www.ahnlanduse.com
Ms. Athena Novak
Time is like a river. You cannot touch the same water twice, because the flow that has passed will never pass again. Enjoy every moment of your life.

On Jun 21, 2022, at 2:50 PM, Ilan Israely <ilan@ophirrf.com> wrote:

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From: Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>
Sent: Tuesday, June 21, 2022 2:15 PM
To: michaelvignieri@gmail.com
Cc: eugena_weng@hotmail.com; silvia@summerlandpartners.com; manny@summerlandpartners.com; Ilan Israely <ilan@ophirrf.com>; Gilbert, Andreas@Wildlife <Andreas.Gilbert@Wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>
Subject: 5300 Beethoven Street/ Marina Island Bridge Project

Good afternoon everyone,

My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW. Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:

1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake

In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.

It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.

FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials

As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.

Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do and what information would be required in the Notification.

Thank you,

Fritz Rieman
Environmental Scientist

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605
If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 7. RE_ 5300 Beethoven Street_ Marina Island Bridge Project (7)

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From:	Michael Vignieri
To:	Rieman, Frederic@Wildlife
Cc:	Eugena Weng; silvia@summerlandpartners.com; Manny Kozar; Ilan Israely; Gilbert, Andreas@Wildlife; Tang, Victoria@Wildlife;
Subject:	Re: 5300 Beethoven Street/ Marina Island Bridge Project
Sent:	6/21/2022 3:54:34 PM

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear Mr. Reiman,

Thank you for your email. I am in touch with the contractor and will also be reviewing my archival files as I believe this may have initially been addressed. I should be able to follow up with you tomorrow. Also, please be aware that construction on the project is currently on hold.

Michael

Michael Vignieri & Associates
Mobile Direct: 310-266-9910

Email: michaelvignieri@gmail.com
Web: mvignieri.com

> On Jun 21, 2022, at 2:14 PM, Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov> wrote:

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Good afternoon everyone,

My name is Fritz Rieman and I am an Environmental Scientist with the California Department of Fish and Wildlife (CDFW). CDFW has become aware of a project to install a bridge over the Centinela Creek Channel; however, it appears that a Notification for Lake or Streambed Alteration was never submitted to CDFW. Fish and Game Code (FGC) section 1602 requires a person to notify CDFW before:

1) substantially diverting or obstructing the natural flow of a river, stream, or lake;
2) substantially changing the bed, channel, or bank of a river, stream, or lake;
3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or
4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake

In CDFW's view, notification was required because these activities will substantially change the bed, channel, or bank of the Centinela Creek Channel and construction activities may result in the depositing of debris or waste into the Channel.

It appears that construction of the bridge has already begun and debris and other loose material is present at the site in areas where it may pass into the Channel.

FGC sections 5650 and 5652 make it unlawful to pollute waters of the state. FGC section 5650 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, mammals, or bird life, including, but not limited to gasoline and oil, as well as sediment. FGC section 5652 makes it unlawful to deposit in, permit to pass into, or place where it can pass into waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any garbage, refuse, or waste, among other materials

As a first step to address this matter, you will need to immediately stop all construction activities for this project that may impact the Centinela Creek Channel and stop placing deleterious materials within 150 feet of the watercourse if you have not done so already.

Please respond to this email to confirm that you have received it. I would like to have a discussion with you about this matter and may propose certain actions to protect fish and wildlife resources that have been or could be affected by the activities described above. I can also give you more information about how to complete a notification for Lake or Streambed Alteration using the Environmental Permit Information Management System (EPIMS) available here:epims.wildlife.ca.gov/index.do and what information would be required in the Notification.

Thank you,

Fritz Rieman
Environmental Scientist
CA Dept. of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720
Cell Phone: (562) 619-0605

If you need assistance navigating the EPIMS database, please contact CDFW via phone at: 833-30EPIMS (833-303-7467) or via Email at: EPIMSHELP@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 8. 1600-2023-9029-R5 Notice of Violation of Fish and Game Code Section 1602

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

SENT CERTIFIED MAIL ONLY

December 12, 2023

Certified Mail: 7021 1970 0001 5538 5907
Eugena Weng
5300 Marina Island, LLC
5300 Beethoven
Los Angeles, CA 90066
Eugena_Weng@hotmail.com

Subject: 1600-2023-9029-R5 Notice of Violation of Fish and Game Code Section 1602

Dear Eugena Weng:

On December 7, 2023, the California Department of Fish and Wildlife (CDFW) Warden Andreas Gilbert visited 5000 Beethoven Street, Los Angeles CA. During his visit, Warden Gilbert observed a bridge being constructed within the limits of a stream (Figure 1). That activity is subject to Fish and Game Code section 1602.

Fish and Game Code section 1602 requires a person to notify CDFW before: 1) substantially diverting or obstructing the natural flow of a river, stream, or lake; 2) substantially changing the bed, channel, or bank of a river, stream, or lake; 3) using any material from the bed, channel, or bank of a river, stream, or lake; and/or 4) depositing or disposing of debris, waste, material containing crumbled, flaked, or ground pavement where it may pass into a river, stream, or lake.

In this case, CDFW has determined that notification was required because the activity substantially altered the stream channel of Centinela Creek, and construction activities may result in the depositing of debris or waste into the Channel. CDFW informed you multiple times to notify for this activity. This correspondence includes, but is not limited to, once via email on June 21, 2022, and again verbally on October 18, 2022. However, CDFW was unable to locate a notification for these activities.

As a first step to address this matter, CDFW requests that you immediately stop performing any project related activities on the property if you have not already done so; complete a notification using the Environmental Permit Information Management System (EPIMS) available here: epims.wildlife.ca.gov/index.do; and submit the complete notification, notification fee, and a copy of this notice to the South Coast

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Region (Region 5) within 30 days of the date of this letter. The contractor, Many Kozar, has also been advised of this process.

After CDFW receives the notification and fee, it will process the notification and issue a draft Streambed Alteration Agreement (Agreement) as described in Fish and Game Code sections 1602 and 1603.

If you have any questions regarding this letter, please contact Andrew Aitken at (562) 525-9688 or by email at Andrew.Aitken@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Tim Dillingham
18197A48BF3B4B6...

Tim Dillingham signing for

Erinn Wilson-Olgin
Regional Manager
South Coast Region

ec: California Department of Fish and Wildlife

Victoria Tang, Senior Environmental Scientist (Supervisory)
Victoria.Tang@wildlife.ca.gov

Andrew Aitken, Environmental Scientist
Andrew.Aitken@wildlife.ca.gov

Andreas Gilbert, Warden
Andreas.Gilbert@wildlife.ca.gov

Susan Howell, Staff Services Analyst
Susan.Howell@wildlife.ca.gov

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Figures



Figure 1. The bridge being constructed over Centinela Creek at 5000 Beethoven Street, Los Angeles CA. These photos were taken on December 7, 2023 by Warden Gilbert.

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 9. RE LAN-46651 - 5000 Beethoven Extension_1

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

From:	Athena Novak
To:	Aitken, Andrew@Wildlife
Cc:	Rieman, Frederic@Wildlife; Ilan Israely;
Subject:	Re: LAN-46651 - 5000 Beethoven
Sent:	5/24/2024 5:39:04 PM

Follow Up Flag:	Follow up
Flag Status:	Flagged

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello Andrew - It was nice talking to you today.

The Applicant agrees to a 30 day extension of time from the 6/3/24 date to review the application submitted.

Wishing you a wonderful Holiday weekend. Once again we want to thank you for guiding us through this process.

Best,
Athena Novak
AHN & Associates
Phone: 818-906-7449

On Friday, May 24, 2024, 7:43:07 AM PDT, Aitken, Andrew@Wildlife <andrew.aitken@wildlife.ca.gov> wrote:

> Hello,
>
> Following up this morning to see if you all have discussed this.
>
> Please inform me of the Applicant's decision before the due date.
>
> Thank you,
>
> *Andrew Aitken*
>
> *Environmental Scientist*
>
> *CA Dept. of Fish and Wildlife*
>
> *South Coast Region 5*

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

3030 Old Ranch Parkway, Suite 400

Seal Beach, CA 90740

Phone Number: (562) 525-9688

From: Aitken, Andrew@Wildlife
Sent: Thursday, May 23, 2024 9:13 AM
To: athenanvk@aol.com
Subject: LAN-46651 - 5000 Beethoven

Good morning,

Thank you for providing updated material regarding the incomplete letter for LAN-46651 - 5000 Beethoven.

Currently, CDFW's 30 day review deadline is set to 6/3/24. Would the applicant be willing to agree to a 30-day time extension so CDFW can have more time to review it in detail?

Thank you,

Andrew Aitken

Environmental Scientist

CA Dept. of Fish and Wildlife

South Coast Region 5

3030 Old Ranch Parkway, Suite 400

Seal Beach, CA 90740

Phone Number: (562) 525-9688

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 10. EPIMS-LAN-46651 R5_Notification_Extension_2

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

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 24, 2024

Manny Kozar
Summerland
23622 Calabasas Rd, Suite 121
Calabasas, CA 91302
athenanvk@aol.com

Time Extension for Lake or Streambed Alteration Notification Review, No. EPIMS-LAN-46551-R5, 5000 Beethoven

Dear Manny Kozar:

This letter confirms that we mutually agreed to extend the date by which the California Department of Fish and Wildlife will finish the review of the notification for Lake or Streambed Alteration for completeness by two weeks for the project described in the above-referenced notification. Instead of the review of the notification and subsequent determination being due on Wednesday July 3, 2024, the due date has been extended 30 days to Friday August 2, 2024. Please sign and return this letter to acknowledge the time extension.

If you have questions regarding this letter, please contact Andrew Aitken, Environmental Scientist, at (562) 525-9688 or by email at Andrew.Aitken@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Frederic Rieman
0B814863858E450...

Frederic (Fritz) Rieman
Senior Environmental Scientist (Supervisor)

ACKNOWLEDGEMENT

I hereby agree to the above-referenced time extension.

Print Name: Manny Kozar Date: 6/28/2024

Signature: DocuSigned by: Manny Kozar E586F1F2489A4A7...

ec: California Department of Fish and Wildlife

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Andrew Aitken, Environmental Scientist
Susan (Sue) Howell, Staff Services Analyst

Manny Kozar, Summerland
Athena Novak, AHN & Associates

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Exhibit 11. EPIMS-LAN-46651-R5_Notification_Extension_3

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

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

July 24, 2024

Ilan Israely
5300 Beethoven Street
Los Angeles, CA 90066
ilan@ophirrf.com

Time Extension for Lake or Streambed Alteration Notification Review, No. EPIMS-LAN-46651-R5, 5000 Beethoven

Dear Ilan Israely:

This letter confirms that we mutually agreed to extend the date by which the California Department of Fish and Wildlife will finish the review of the notification for Lake or Streambed Alteration for completeness by four weeks for the project described in the above-referenced notification. Instead of the review of the notification and subsequent determination being due on Friday August 2, 2024, the due date has been extended to Friday August 30, 2024. Please sign and return this letter to acknowledge the time extension.

If you have questions regarding this letter, please contact Andrew Aitken, Environmental Scientist, at (562) 525-9688 or by email at Andrew.Aitken@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Frederic Rieman
0B814863858E450...

Frederic (Fritz) Rieman
Senior Environmental Scientist (Supervisor)

ACKNOWLEDGEMENT

I hereby agree to the above-referenced time extension.

Print Name: Ilan Israely _____ Date: 7/28/2024

Signature: DocuSigned by: Ilan Israely 6ED7D76C27214FC... _____

ec: California Department of Fish and Wildlife

Andrew Aitken, Environmental Scientist

Docusign Envelope ID: 03C378F0-F235-489E-84BB-7789EA5534DD

Susan (Sue) Howell, Staff Services Analyst

Manny Kozar, Summerland
Athena Novak, AHN & Associates

EcoTierra consulting

Memorandum

DATE: June 5, 2026

TO: Kenton Trinh, City Planner
Los Angeles City Planning Department
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

FROM: Curtis Zacuto
EcoTierra Consulting, Inc.
5776-D Lindero Canyon Road #414
Westlake Village, CA 91362

RE: Addendum No. 1, MND -97-0348-ZC/GPA(HD)(SPR) Project - Responses to Appeal by Defend Ballona Wetlands Letter

---

The purpose of this memorandum is to provide responses to Defend Ballon Wetlands letter submitted to Los Angeles City Planning Department regarding the Advisory Agency's determination regarding the Project applicant's request for a private street map.

The Appeal letter included the following topics:

1. Incomplete Application
2. Cumulative Impacts (Related to the Ballona Wetlands)
3. Confusing and/or Inadequate Description
4. Changed Circumstances since the 1997/1998 Mitigated Negative Declaration
5. More CEQA Violations
6. Piecemealing
7. Insufficient/Inadequate Safe Vehicular Access

EcoTierra has provided responses to items 4 and 5 below.

RESPONSES TO APPEAL LETTER

DEFEND BALLONA WETLANDS

1. Incomplete Application - Response

The commenter asserts that the application(s) for the stated approvals in the Letter of Determination are incomplete due to the number of conditions. Further asserts that the conditions be met before approvals are granted by the City Planning officials who agreed to the approvals.

The Subdivision Map Act, codified primarily in Government Code sections 66410 through 66499, regulates the division of land and the creation of parcels, tracts, or lots. It establishes the framework for local agencies to review, approve and condition subdivision maps,

When a tentative map is submitted to the applicable local agency, which assesses legal lots, street dedications, drainage, and public improvements. Conditions of approval are attached to ensure compliance with applicable general plans, zoning, and subdivision standards. Once tentative approval is granted, the project proceeds to final map submission, where concrete adjustments and final design details are validated before recording.

The first step in the process of a Subdivision Map is the Letter of Determination issued by the Los Angeles City Planning Department. Upon submittal of request from the applicant city staff circulates the map to multiple departments with a request for their response letters to be issued with conditions. The conditions are then included in the final determination letter. The application was not incomplete because the department conditions were not satisfied prior to the approval being granted.

2. <u>Cumulative Impacts (Related to the Ballona Wetlands) - Response</u>

The commenter asserts that the pending approvals/permits/construction activities cumulatively could impact numerous endangered, threatened and otherwise rare, protected species and those cumulative impacts were not considered in the approvals. The commenter characterized the site as being adjacent to the Ballona Wetlands Ecological Reserve (Reserve).

The Project Site is situated at the confluence of Ballona Creek and Centinela Channel and is separated from the Reserve with Ballona Creek, undeveloped land and Culver Boulevard. The Project Site is not adjacent to the Reserve. The bridge is built over Centinela Channel connecting the site to Beethoven Street via a built, urbanized area consisting of commercial buildings and surface parking. South Environmental prepared a Biological Resources Report in 2025 (Report) (attached to this memorandum). As discussed in the Report, Centinela Channel was modified as a concrete channel prior to the Project bridge. As discussed in the Report, while some native vegetation remains in the study area, it has been subject to fuel modification and disturbance prior to this project and is now sparse in comparison to ruderal/invasive vegetation.

The South Environmental Report included a cumulative impacts analysis for the Project in the Executive Summary, Section 3.4, Section 4.4, Section 5.5, Section 6.5, and in the Section 8 Conclusions. The findings of the report concluded that the project has no impact to CEQA protected or regulated biological resources, and therefore, does not contribute to any cumulative impacts to biological resources in the region. This report and cumulative impacts analysis is evidence that the appeal letter comments are unsubstantiated and false, and that cumulative impacts were assessed in the 2025 Biological Resources Report for the project and these impacts were determined to be avoided by the project.

The commenter also asserts that cumulative traffic impacts are great and was not adequately addressed given the age of the MND and questions why the Addendum was not circulated to the public or relevant agencies. The Institute of Transportation Engineers (ITE) provides industry tools and standards for

transportation professionals such as the *ITE Trip Generation Manual*, now in its *12th Edition*. The *ITE Trip General Manual* (*Manual*) provides planners, developers, and engineers with standardized data to estimate the number of trips (vehicles, pedestrians, and transit) that a proposed development will generate. The *Manual* explicitly states that trip generation rates are estimated as a function of specific land use classifications (e.g., residential, retail, office, commercial). Infrastructure itself—whether a bridge, tunnel, or highway segment—acts to connect these generative or attractive uses. The bridge itself is not a generating use. The purpose of the Addendum to the 1998 MND was to provide more details regarding the bridge. Therefore, assertion that the cumulative traffic was not adequately addressed and given the age of MND is not relevant.

Refer to Response 3 below regarding public circulation of the Addendum.

Refer to Response 4 below regarding age of the MND.

3. <u>Confusing and/or Inadequate Description - Response</u>

The commenter states the Planning Department's notice for public hearing mentions the Addendum and questions that it wasn't circulated to the public for review and asserts that is contrary to CEQA to not inform the public of impacts. Under the California Environmental Quality Act (CEQA), Guidelines Section 15164 (14 CCR § 15164), an Addendum is not circulated for public review because it only addresses minor technical changes or project modifications that do not trigger the need for a Subsequent EIR or Supplemental EIR. While the addendum must be included in the final record, it does not require public circulation, provided there is a brief explanation and substantial evidence in the record for why a subsequent EIR is not necessary. Therefore, the City is not required to publish on the website or provide copies of the Initial Study that supports the Addendum.

The commenter questions the approval of a Tentative Tract Map that was not included in the department's notice of the public hearing nor mentioned during the public hearing. City staff to address.

4. <u>Changed Circumstances since the 1997/1998 Mitigated Negative Declaration - Response</u>

The commenter asserts that 1997 MND for the Approved Project is "outdated" and that there are changed circumstances in the project site's immediate area. There is no statutory expiration or age limit for an Initial Study (that supports a Negative/Mitigated Negative Declaration or Addendum) or EIR under CEQA. Instead, an environmental document remains valid indefinitely unless project changes, changed circumstances or new information trigger the need for a Subsequent or Supplemental document (*Public Resources Code (PRC) Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164*).

There have been no changes to the original and approved request by the Project Applicant. The Approved Project included a proposed 90,000 square-foot, two-story, 45-foot high industrial/manufacturing use building with 180 parking spaces, which included a private access driveway extending north from the terminus of Beethoven Street across Centinela Creek to the Project Site. The access bridge is required to provide legal access to the 3.09 acre parcel. The 2025 Initial Study Addendum No.1 analyzed additional

details regarding the proposed access bridge, which had been approved by the Department of the Army, Corps of Engineers under EE98-86a and Los Angeles County Flood Permit No. 99047-A.

The "changed circumstances" as stipulated in CEQA are related to a proposed project and not the surrounding environment. The primary rule under CEQA is that an agency must analyze a project's impact *on* the environment, not the environment's impact *on* the project. Lead agencies are generally not required to analyze or mitigate how pre-existing environmental conditions affect future users or residents of a proposed development. CEQA Guidelines Section 15126.2(a), establishes that the environmental document "shall identify and focus on the significant effects of the proposed project." The courts have strictly interpreted this to mean the project's impact on the environment, dictating that a project does not need to analyze or mitigate pre-existing environmental hazards (like pre-existing toxic air, pre-existing soil contamination, or sea-level rise) unless the project itself exacerbates those conditions.

In the landmark ruling, *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th269*, the California Supreme Court ruled that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents". The Court determined that analyzing "CEQA-in-reverse" (the environment's impact on a project) is only required in two scenarios:

Scenario 1: When there is an express statutory or legislative directive to evaluate the hazard for a specific type of project (such as schools near freeways or housing projects subject to seismic hazards).

Scenario 2 When the proposed project risks *exacerbating* the pre-existing environmental hazards (i.e., making the existing condition worse)

Addendum No. 1 to the Adopted IS/MND was prepared to fully analyze the details of the private access bridge pursuant to CEQA. No other changes to any aspect of the Approved Project have been proposed; therefore, Amendment No. 1 evaluated only the construction and operation of the private access bridge. The Applicant has not changed the Approved Project which otherwise would trigger new or additional subsequent analysis. Further, the analysis of the bridge does not rise to the level of the two scenarios outlined by the State Supreme Court. And so, the environmental document (1987 MND) does not need to be updated based on changed circumstances of the surrounding environment.

5. <u>More CEQA Violations - Response</u>

The commenter questions the City's conclusion that no major revisions to the 1987 MND or a Subsequent EIR or Negative Declaration is required for project approval. Further, the comment questions the location of the Addendum and questions the basis for the conclusion. The comment also states the City's website does not include the Addendum and that there is no checklist to the Letter of Determination available for public review.

Under the California Environmental Quality Act (CEQA), Guidelines Section 15164 (14 CCR § 15164), an Addendum is not circulated for public review because it only addresses minor technical changes or project

modifications that do not trigger the need for a Subsequent EIR or Supplemental EIR. While the addendum must be included in the final record, it does not require public circulation, provided there is a brief explanation and substantial evidence in the record for why a subsequent EIR is not necessary. Therefore, the City is not required to publish on the website or provide copies of the Initial Study that supports the Addendum.

6. <u>Piecemealing - Response</u>

The initial part of the comment states the community does not want the parcel of land developed. This is a stated opinion and no response necessary. The comment states that the developer has embarked on piecemealing the project. See response below.

The comment questions the project approvals and purports the bridge was not part of the Approved Project. This is a false claim. The bridge was part of the Project and is discussed in the Summary of the Public Hearing and Communication document from the public hearing held for the Project on January 16, 1998, in which two (2) people were present (presumably from the public). The document summarized "The applicant indicated that a bridge will be constructed across Centinela Creek to serve the project" and documented "no oral or written testimony was received in opposition to the project". Also, in Summary of Recommendation in the staff report, it is documented that the applicant proposed a bridge across Centinela Creek. Further, the bridge as part of the Project is discussed in the City Planning Department Staff Report to the City Planning Commission, April 9, 1998. The project approvals were conducted by U.S. Army Corps of Engineers that is part of the U.S. Department of Defense and was also revied and approved by the Los Angels County Public Works Department and the City of Los Angeles Building and Safety Department, all legitimate reviewing agencies,

The comment asserts that installation of the bridge resulted in pilings with significant runoff area immediately adjacent to the pilings with cracks in the concrete in the area of the pilings that have been reported. As discussed in the Initial Study Addendum, the bridge construction plans were reviewed by the U.S. Department of Army, Corps of Engineers under EE98-86a and Los Angeles County Flood Permit No. 99047-A. The plans were further reviewed by City of Los Angeles Bureau of Engineering and construction was monitored. The Initial Study Addendum, Hydrology and Water Quality (pp. 65 - 71) fully analyzed potential surface water runoff and water quality from the bridge. As discussed in the Addendum, the bridge was constructed on impervious surface areas and post construction allows surface water to runoff in the same volume and manner as under pre-development conditions. The question regarding who is liable should the sides of the waterway fail to be addressed by City staff.

The comment alluded that the developer is embarking on implementing a series of small parts of the project which is piecemealing that is not allowed under CEQA. CEQA Guidelines Section 15378(a) states the "whole of the action" must be defined to determine the potential physical change or a reasonably feasible indirect change. As previously discussed above, the bridge has been part of the project since the initial analysis and approval in 1988. The bridge is a necessary component of the Project for access to the parcel that is isolated by the confluence of Ballona Creek, Centinela Creek and SR-90 (Marina Freeway).

Addendum No. 1 to the Adopted IS/MND was prepared to fully analyze the details of the private access bridge pursuant to CEQA. As discussed above, the bridge was part of the project and additional analysis of the details of the bridge is not piecemealing as it is an element of the "whole action" that is part of the project approval in 1988.

7. <u>Insufficient/Inadequate Safe Vehicular Access - Response</u>

The comment disagrees with the Finding of Fact that there is adequate and safe vehicular access from a private street over a private street for police, fire, sanitation and public services. The comment claims that two ingress and egress roads to the site have been previously stated to be necessary. Further the comment asserts that the Los Angeles County Flood Control District, which oversees the maintenance of Ballona Creek and Centinela Creek, would not approve or allow a public street for ingress/egress to the site.

If two access points were required for ingress/egress to the site, the Project would not have been approved by the Planning Department and Building & Safety Department of the City of Los Angeles. Also, the Los Angeles Fire Department reviewed the private street map application and never indicated that there would be inadequate emergency access with only one ingress/egress approach. Further, the bridge over Centinela Creek does not impede the Los Angeles County Flood Control District's ability to provide necessary maintenance of either Centinela or Ballona Creeks. No complaints by this agency to the City of Los Angeles have been submitted indicating any such impediment to maintenance.

Appeal of City of Los Angeles Advisory Agency and Planning Director Decision
Case No.: PS-1464
5000 South Beethoven Street (5927, 5298, and 5300 South Beethoven Street)
Palms – Mar Vista – Del Rey [T][Q]M2-1, M2-1, and A1-1 D.M.: 102B157 and 105B157
C.D.: 11 – Councilwoman Traci Park

CEQA No.: MND-97-348-ZC-GPA-HD-SPR and ENV-2023-6735-MND-REC1

Re: Legal Description: Arbs 1 and 2, Lot FR 1, Tract TR 1100; Arbs 301 and 432, Lot FR Jacinto Talamantes 17 Acres, Tract Rancho La Ballona; Lot FR Jesus Talamantes 17 Acres, Rancho La Ballona; Arb 4, Lot None, Tract Record of Survey; Arb 101, Lot FR Jesus Talamantes 17 Acres, Tract Rancho La Ballona; and Lot A, Tract P M 2260

Re: BIRD ISLAND – also known as 5000 Beethoven - Approval of a Tentative Tract Map, approval of a CEQA Addendum, Approval of a private street being converted to a public street

Dear City Planning Director, City Planning Commission and City of Los Angeles officials:

We hereby file this appeal of the decisions to grant LAMC approvals contrary to the law and standard practices for such approvals and violations of CEQA (California Environmental Quality Act) re: Environmental clearances for the work to be done re: 5000 South Beethoven Street (5927, 5298, and 5300 South Beethoven Street) for the reasons outlined herein:

1. **Incomplete application** – Many of these conditions should be met FIRST, before these approvals are granted.

1

While the Letter of Determination for these approvals begins with this:

"The Advisory Agency found, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, that the project was assessed in Mitigation Negative Declaration, No. MND-97-0348-ZC-GPA-HD-SPR adopted on September 9, 1998; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the Addendum, No. ENV-2023-6735-MND-REC1 dated October 2025, no major revisions are required to the Mitigated Negative Declaration; and no subsequent EIR or Negative Declaration is required for the approval of the project. Pursuant to Chapter 1, Article 8, of the Los Angeles Municipal Code (LAMC), the Advisory Agency approved Private Street No. 1464, providing legal frontage and access for the legal lots at 5000 South Beethoven Street, as shown on the map stamp-dated December 9, 2025, in the Palms – Mar Vista – Del Rey Community Plan. The Deputy to the Director of Planning will advise the Department of Building and Safety with a Letter of Completion that the necessary permits may be issued pursuant to this approval following receipt of satisfactory evidence of compliance with the following conditions:" –

it is followed by 11.5 pages of CONDITIONS which must be followed in order for the developer to obtain his permits. Those conditions are many and indicate that the application(s) for these approvals are incomplete and should have had such conditions met BEFORE any approvals were granted by the City Planning officials who agreed to these approvals.

1

2. Cumulative Impacts: The properties in question are immediately adjacent to the Ballona Wetlands Ecological Reserve, which is a fragile and rare mosaic of coastal ecosystems, and which is the ONLY State Ecological Reserve in all of Los Angeles County, and the pending approvals/permits/construction activities must be considered with other possible intrusions, possibly cascading into cumulative impacts that could impact numerous endangered, threatened and otherwise rare, protected species.

Those cumulative impacts were not considered in these approvals, even though there were numerous comments made in the hearing that was overseen by planning staff.

Comments were also submitted by the Del Rey Neighborhood Council, Del Rey Residents Association, Defend Ballona Wetlands, Coastal Lands Action Network, Ballona Wetlands Institute, Ballona Creek Renaissance and Los Angeles Waterkeeper.

The site is at the confluence of Ballona Creek (a river) and Centinela Creek – which is why the fauna, particularly birds, find suitable habitat for feeding, nesting and roosting.

2

Cumulative impacts from traffic alone – for a decades old Mitigated Negative Declaration (MND) are great and were not adequately assessed in whatever "addendum" is reported by the developer to have been completed, but was never circulated to the public nor to relevant agencies.

2

3. **Confusing and/or Inadequate Description of the pending approvals at the time of the public hearing and at the time for public comment to be submitted (deadline of January 30, 2026.)**

From our letter submitted on January 30, 2026 –

> "Here is what the planning department's notice for public hearing stated:
>
> 1. Based on the whole of the administrative record, that the project was assessed in Mitigated Negative Declaration, Case No. MND-97-0348-ZC-GPA-HD-SPR adopted on September 9, 1998; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the Addendum, Case No. ENV-2023-6735-MND-REC1, dated August 2025, no major revisions are required to the Mitigated Negative Declaration; and no subsequent EIR or Negative Declaration is required for approval of the project.
>
> 2. Pursuant to Chapter 1, Article 8 of the Los Angeles Municipal Code ("LAMC"), a Private Street approval to provide a legal frontage and street access for the parcels at 5000 South Beethoven Street.

3

And yet, these approvals in the department's/agency's Letter of Determination state there was an Addendum dated October, 2025.

Where is this **Addendum, dated October, 2025**, and why was the public notice referencing an **Addendum, dated August 2025**? Neither of these "Addendum"s were ever circulated to known public interest groups nor to relevant agencies – which is contrary to how CEQA requires such notifications, since CEQA is primarily a process that informs the public of impacts relevant to the public interest.

Additionally, we are now informed that the Letter of Determination includes approval of a **Tentative Tract Map**. This "Tentative Tract Map approval" was not include ed in the department's notice of public hearing, nor was such an approval mentioned nor described during the public hearing, which was attended by several members of the interested public, including the undersigned. Therefore, the public could not and has not had the opportunity for adequate review or public comment about such an approval.

If the approval authorities are relying on the 1997/98 MND, then presumably the project is for a commercial warehouse-type space, however, the most recent project brought to the Del Rey Neighborhood Council was for a very dense mixed use project, including residential and businesses uses. So – the question still is – what is the project being considered?

3

4. Changed circumstances since 1997/1998 – VERY outdated Mitigated Negative Declaration (MND) – also from our letter of January 2026 – and not answered nor backed up by the CEQA decision of the department:

> 'How can the City Planning Department determine that no subsequent CEQA document is required for an MND dated 1997 and approved in 1998? There are so many changed circumstances in the immediate area during the last 30 years, that a Court would surely find it laughable to agree with such an absurd conclusion. The massive Playa Vista development, just a few blocks away, was not even started in 1998. The Ballona Wetlands State Ecological Reserve, which borders directly on to this site, was not acquired by the State of California until 2003, followed by the Ecological Reserve designation in 2005. The private school that takes up three of four corners a block away from this site, was not nearly the size it is today in 1998."

4

Really? The public and the "Advisory Agency" – Planning Department is relying on an MND from 1997/98? This is nearly 30 years ago, and there are so many changed circumstances and even different laws to be applied that such a reliance is not only laughable, but is legally indefensible.

5. More CEQA VIOLATIONS

The Letter of Determination states: "pursuant to CEQA Guidelines 15162 and 15164, as supported by the Addendum, No. ENV-2023-6735-MND-REC1 dated October 2025, no major revisions are required to the Mitigated Negative Declaration; and no subsequent EIR or Negative Declaration is required for the approval of the project."

5

This statement and conclusion does not appear to be true. Where is this Addendum document? And on what information is this conclusion based?

There appear to be a number of disjointed, random consultant-based documents in a related file, but no Addendum in full that has been either circulated nor approved.

The LA City Planning Department website shows no approved documents for this alleged clearance, and The State of California CEQA website also shows no approved submitted documents for an environmental clearance under the California Environmental Quality Act (CEQA.)

Additionally, is no checklist attached to this Letter of Determination or otherwise available for the public to review to determine if accurate information was supplied by the applicant, or if the proper determination for CEQA compliance was made.

5

6. Piecemealing: - Ever since it was made clear to the developer of these several proposals being made for this project site that the community does NOT WANT this parcel of land to be developed (and that there are questionable, if not entirely inadequate ingress/egress problems with accessing the site) – the developer has embarked on implementing a series of smaller parts of the project – this is known as piecemealing and is not allowed under the California Environmental Quality Act (CEQA.)

First, a bridge was installed with very questionably approvals by various city departments – none of it approved as PART OF the larger project, which had been opposed by the Del Rey Neighborhood Council and virtually all residential and environmental groups watching over this site.

During this bridge installation that still has questionable approvals, very large pilings were pounded into the concrete sides of the Centinela Creek/waterway. A significant runoff drainage area is immediately adjacent to where these pilings were pounded into the concrete and into the earth. We noted cracks in the concrete where these pilings were pounded in, and we reported them only to receive responses from City Planning that "someone" should report these possible public safety problems to a federal or county agency. Should there be a failing of these sides of this waterway, whose liability concern will this be? This possibility is a good reason why piecemealing of such work is not allowed.

6

Now, in order to use the bridge, a conversion of a private driveway to a public street is being approved by the "Advisory Agency" – i.e., the Planning Department staff. This is further piecemealing of the entire project – a project that was reviewed nearly 30 years ago, or a newly conceived project that is opposed by the entire surrounding community. Take your pick. Regardless of which project this ultimately is, it is a piecemealing of that larger project, which is not allowed.

7. **Insufficient/Inadequate Safe Vehicular Access to the Property from a Public Street over a Private Street for Police, Fire, Sanitation and Public Service Vehicles:**

We also object to this "Finding of Fact" –

> In connection with the approval of Private Street No. 1464, the Advisory Agency of the City of Los Angeles, pursuant to Section 18.02 of the Los Angeles Municipal Code (Private Street Regulations), makes the prescribed findings as follows:
>
> (a) THERE EXISTS ADEQUATE AND SAFE VEHICULAR ACCESS TO THE PROPERTY FROM A PUBLIC STREET OVER A PRIVATE STREET FOR POLICE, FIRE, SANITATION AND PUBLIC SERVICE VEHICLES.
> The proposed Private Street has been reviewed by the City Engineer which requires a minimum 39-foot and 40-foot variable width private street easement be provided from the terminus of Beethoven Street to the project site, including a turnaround area, at a location and in an alignment satisfactory to the City Engineer.
>
> The private street also has been reviewed by the Fire Department which recommends that the project be subject to conditions stated in the memo dated April 25, 2023. All conditions will be incorporated in the conditions of approval to assure adequate and safe vehicular access to the property.

7

Over the years while various proposals for development on this land have been considered, it has repeatedly been explained that it would be necessary to have TWO ingress and egress roads to the site, and yet here – the Findings of Fact only describes one. We do not believe the LA County Flood Control District, which oversees maintenance of these two waterways – Ballona and Centinela – have approved or would allow a public street for ingress/egress to this site.

Submitted Sincerely by:

Marcia Hanscom /s/
Marcia Hanscom
Community Organizer &
Legal Coordinator
Defend Ballona Wetlands

Robert J. van de Hoek /s/
Robert J. van de Hoek
Environmental Science Advisor
Defend Ballona Wetlands

Cc: Jamie T. Hall, Channel Law Group and Bryan Pease, Esq., Pease & Ijadi, APC

SOUTH ENVIRONMENTAL
2061 N. Los Robles Avenue, Ste. 205 Pasadena, California 91104 / www.southenvironmental.com

June 5, 2026

Marina Island LLC
12449 Putnam Street
Whitter, CA 90062

RE: Response to Comments on the 5000 South Beethoven Street Project, City of Los Angeles, California

Dear Marina Island LLC:

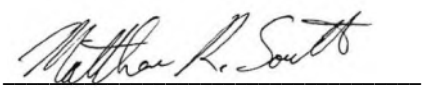
South Environmental prepared a Biological Resources Report for the 5297 and 5300 Beethoven Street Project in 2025, and the report is attached to this letter. The report was prepared retroactively in support of a 2024 bridge development at 5300 Beethoven Street that connects to 5000 Beethoven Street and spans the Centinella Creek Channel. The project prepared a 2023 addendum (ENV-2023-6735-MND-REC1) to an existing Mitigated Negative Declaration (MND; MND-97-348-ZC-GPA-HD-SPR). The original MND was completed in 1997 and included an analysis of the environmental effects of the bridge construction, and the 2025 Biological Resources Report for the project assessed the potential CEQA related impacts of the project on biological resources in support of the addendum. Following the City of Los Angeles' (City's) approval of the addendum, Defend Ballona Wetlands sent an appeal letter to the City: *Appeal of City of Los Angeles Advisory Agency and Planning Director Decision Case No.: PS-1464 5000 South Beethoven Street (5927, 5298, and 5300 South Beethoven Street) Palms-Mar Vista-Del Rey [T][Q]M2-1, M2-1, and A1-1 D.M.: 102B157 and 105B157 C.D.: 11 – Councilwoman Traci Park*. The appeal letter item number 2 includes a comment that the original MND for the project did not include a cumulative impacts analysis per the requirements of CEQA, and further states that the cumulative impacts analysis included in the 2023 addendum to the MND is inadequate despite also stating that the commentor never received a copy of the addendum for review. No other comments on biological resources were made in the appeal letter and below is a response to Item 2 regarding cumulative impacts to biological resources.

Response to Comment

South Environmental has prepared a Biological Resources Report in 2025 (attached to this letter) that includes a cumulative impacts analysis for the project in the Executive Summary, Section 3.4, Section 4.4, Section 5.5, Section 6.5, and in the Section 8 Conclusions. The findings of the report is that the project has no impact to CEQA protected or regulated biological resources, and therefore, does not contribute to any cumulative impacts to biological resources in the region. This report and cumulative impacts analysis is evidence that the appeal letter comments are unsubstantiated and false, and that cumulative impacts were assessed in the 2025 Biological Resources Report for the project and these impacts were determined to be avoided by the project.

Should you have any questions or concerns regarding this response to comments please do not hesitate to contact me directly at msouth@southenvironmental.com or (303) 818-3632.

Sincerely,



Matthew R. South, CWB
Principal Biologist

Attachments

A. Biological Resources Report 5297 and 5300 Beethoven Street

ATTACHMENT A.

Biological Resources Report

Biological Resources Report

5297 and 5300 Beethoven Street

5297 and 5300 Beethoven Project
Palms-Mar Vista-Del Ray Community Plan Area, Council District 11

July 2025 (updated November 2025)

Prepared For:
Marina Island LLC
12449 Putnam Street
Whitter, CA 90062

Prepared By:

Matthew South – Principal Biologist
Meagan Stebbings - Associate Biologist
Lucas South- Associate Biologist
South Environmental
2061 N Los Robles Ave, #205
Pasadena, CA 91104
msouth@southenvironmental.com
Phone: 303.818.3632

Table of Contents

1 Executive Summary 3
2 Project Overview 7
2.1 Project Location 7
2.2 Site History 10
2.3 Existing Physical & Natural Geographic Site Features 10
2.4 Proposed Development 10
2.5 Characteristics of the Surrounding Area 12
3 Biological Site Flora Assessment 13
3.1 Flora Literature Review 13
3.2 Flora Field Methodology 13
3.3 Flora Data Analysis 14
3.4 Flora Impacts 17
4 Biological Site Wildlife Assessment 19
4.1 Wildlife Literature Review 19
4.2 Wildlife Field Methodology 19
4.3 Wildlife Data Analysis 20
4.4 Wildlife Project Impacts 23
5 Biological Site Wildlife Movement 26
5.1 Wildlife Movement Literature Review 26
5.2 Wildlife Movement Field Methodology 26
5.3 Wildlife Movement Data Analysis 26
5.4 Wildlife Movement Project Impacts 27
5.5 Cumulative Impacts to Wildlife Movement 27
6 Water Resources 28
6.1 Water Resources Literature Review 28
6.2 Water Resources Field Methodology 28
6.3 Water Resources Data Analysis 28
6.4 Impacts to Water Resources 28
6.5 Cumulative Impacts to Water Resources 29

7 Applicable Regulations and Permits 30
7.1 Regulations 30
8 Conclusions 36
9 References 39

Figures

Figure 1 – Regional Location 8
Figure 2 – Project Vicinity 9
Figure 3 – Proposed Development 11
Figure 4 - Plant Communities and Cover Types 15

Appendices

Appendix A: Photograph Exhibit
Appendix B: Special-Status Species Assessment
Appendix C: Literature Review
Appendix D: Biologist's Resume and Biologists Statement
Appendix E: Site Plan

1 Executive Summary

Introduction: This report includes findings of a biological resources assessment conducted by South Environmental at 5297 and 5300 Beethoven Street in the City of Los Angeles, California for the construction of a new bridge on a project site that includes three parcels (Assessor's Identification Number [AIN] 4211-007-909, 4211-008-014, & 4211-007-034). The existing bridge was constructed in 2024 following project approvals: the Department of the Army Corps of Engineers, Los Angeles County Building Department, and Los Angeles Department of Building and Safety Permit Number subsequent the 1997/98 Initial Study. The City Planning Department believes the Initial Study did not adequately address the proposed bridge. This report is to assess the potential impacts of that development by assessing what biological resources occurred there prior to the development.

Development: the completed development included the construction of a private street over a paved easement at 5300 Beethoven Street to 5000 Beethoven Street. This includes a 71-foot long 28-foot-wide free span bridge.

Plant Communities/Sensitive Natural Communities/Wildlife Habitat: The construction footprint is primarily within developed/ornamental cover type with some of the development footprint on disturbed non-native grassland. Therefore, the impacts occurred in areas where the landscape was already disturbed and unable to support special-status species and therefore no impacts occurred to habitat for special-status species. There are no sensitive natural communities on the project site and no impacts occurred. There are no new fuel modification areas proposed as the site is within proximity to other developments where existing fuel modification occurs, therefore, no new impacts would occur from fuel modification. The project had no impact to habitat for special-status species because none occurs and impact occurred only to ruderal and disturbed non-native grassland areas on the north side of the channel. The remaining areas of impact were to areas that were already developed. Therefore, the project had no impact to habitat for special-status species or sensitive natural communities.

Special-Status Plants: No special-status plants were observed on the study area and none have the potential to occur due to the lack of habitat. Therefore, no impacts to special-status species occurred from the project.

Protected Trees: No protected trees were observed on the study area and none are expected to have occurred prior to development based on the current conditions. Therefore, it is likely no impacts to protected trees occurred.

Protected Areas for Wildlife: Centinela Creek is designated as a Criteria 1 area for the Ballona Creek Protected Area for Wildlife (PAW) in the City's Wildlife District Ordinance (WDO). According to the ESA 2021 PAW Report, the Ballona Creek PAW consists of the concrete-lined channelized portion of Ballona Creek from Centinela Avenue to Lincoln Boulevard; includes open water and patches of marsh habitat; and has a moderate potential to support medium mammals, a low potential to support large mammals, a high potential to support birds, and a moderate potential to support other wildlife species. The bridge is built over Centinela Creek.

As established in the WDO, projects involving: construction of a new, standalone building exceeding 500 square feet; additions exceeding 500 square feet; major remodels of a main building on a lot in a Hillside Area; grading in excess of 500 cubic yards; and removal of any Protected Tree, Significant Tree, or tree within the public right-of-way must comply with specific development regulations contained within the WDO. As such, the development regulations of the WDO do not apply to the proposed private access bridge. All projects located on lots identified in the WDO, which includes development of the proposed private access bridge on APN 4211-007-909, would be subject to the regulations for Wildlife Resources contained within the WDO. These regulations require: (1) preparation of a Biological Assessment; and (2) Site Plan Review. Additionally, the bridge plans would be reviewed by the City as part of approval of the requested Private Street Map. Furthermore, the bridge abutments would be installed into existing County of Los Angeles service roads on both sides of Centinela Creek and no portion would extend into the Creek channel. Therefore, the private access bridge would be consistent with the WDO and the Modified Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.

Similarly, the bridge does not impact Centinela Creek in any way and would not alter any PAWs or wildlife movement areas (as described in Section 5.4 below. The project has no impact to the Protected Areas for Wildlife.

Special-Status Wildlife: The construction footprint of 0.23-acre is on a developed/ornamental landscaped cover type and disturbed non-native grassland, both of which cannot support sensitive wildlife due to lack of habitat. These impacts occurred in disturbed areas where special-status species do not occur, nor would they be impacted by the project. The undeveloped areas were disturbed prior to the project and would not have hosted special-status wildlife. Any native plants present on the parcel are not as prevalent compared to the non-native plant species present, therefore any native species present would not constitute native habitat and would be of low ecological value. No new fuel modification is proposed. Because the project impacts occurred on developed/ landscaped and disturbed/ non-native habitat areas, no impacts to habitat for special-status wildlife.

Based on the analysis in this report, the site does not support special-status bats, mountain lion, or monarch butterfly due to lack of habitat. Therefore, there will be no impact from the project on this wildlife.

Many common birds and migratory BCC have the potential to nest on the site. The proposed development would require the removal of trees/shrubs that could provide potential nesting habitat for birds protected by the MBTA, MBPA, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest is within immediate proximity to project activities, and this would also be a violation of the MBTA and Fish and Game Code. Because the project was constructed without a survey for nesting birds it is unknown if impacts occurred. If the project impacts began outside the nesting season, then no impacts would have resulted. According to the Los Angeles Department of Building and Safety timeline construction began in May of 2023 during bird nesting season. Because of the lack of preconstruction nesting bird survey and the timing of construction it is unknown if impacts occurred.

Wildlife Movement: The project is constructed in a highly developed area that is set adjacent to businesses with roadways and freeways surrounding it. The disturbed/non-native grassland is not of high value for wildlife movement and no wildlife would be expected to move through areas immediately adjacent to the property. The channel on the project site is concrete lined and entirely developed and does not provide habitat connectivity and would not be considered a valuable wildlife movement corridor. Nonetheless, if it were to be used by local, common wildlife species that would be found in developed areas the bridge did not block the movement within this area and did not disrupt any potential movement as there is no blockage such as fencing or lighting from the project that would deter wildlife from using this area. Therefore, the project had no impact on wildlife movement.

Water Resources: The project included construction of a concrete bridge over the Centinela Creek Channel. Because the project includes impacts only to areas outside the channel, there were no direct impacts to the channel from the project. Based on the observations during the survey and the photographs in Appendix A, the project was constructed on top of the existing channel and made no alterations to the concrete sides of the channel, and the channel remains fully intact. Because the project was completed without impact on the concrete bed or bank of the channel it did not have any direct impacts to jurisdictional areas and no permits would be required as a result. The project implemented Best Management Practices to control pollutants or sediments from entering the channel during construction and all equipment and materials were staged

outside of the channel. Because the project avoided direct and indirect impacts to the channel, no impacts occurred to jurisdictional features or to water quality.

Cumulative Impacts: The project likely had no impact on biological resources in the region because the developed area lacked native habitats, was heavily disturbed, was no a movement area, and the bridge avoided impacts to jurisdictional areas. No further construction on the bridge will be conducted in the future. Because the project avoided impacts to biological resources it did not contribute to the cumulative impacts to biological resources in the region.

Conclusions: According to the findings in this report the construction of a private bridge over a concrete channel at 5300 Beethoven Street to 5000 Beethoven Street avoided significant impacts on biological resources according to CEQA.

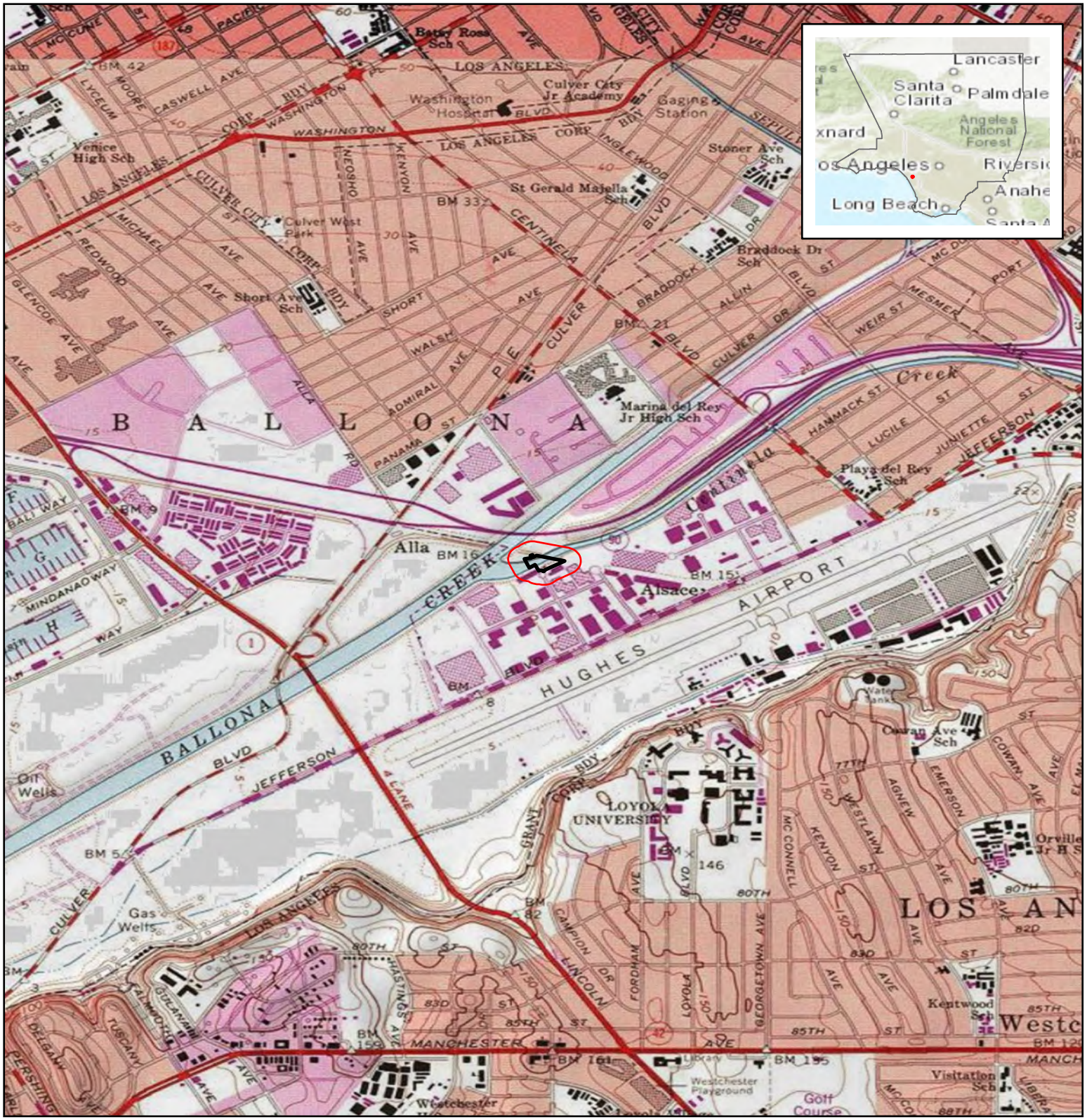
2 Project Overview

This report includes findings of a biological resources assessment conducted by South Environmental at 5297 and 5300 Beethoven Street in the City of Los Angeles, California for the construction of a new bridge on a project site that includes three parcels (Assessor's Identification Number [AIN] 4211-007-909, 4211-008-014, & 4211-007-034). The existing bridge was constructed in 2024 following project approvals: the 1997/98 Initial Study by the Department of the Army, Corps of Engineers under EE98-86a, Los Angeles County Flood Permit No. 99047-A, Los Angeles County Building Department and Los Angeles Department of Building and Safety Permit Number 22020-10000-01437. This report is to assess the potential impacts of that development by assessing what biological resources occurred there prior to the development. The parcels (project site) are in the Del Rey neighborhood and within the Palms-Mar Vista-Del Rey Community Plan Area. This report identifies and assesses the potential impacts to sensitive or protected biological resources on the project site and within a 200-foot buffer study area, indicates the regulations governing these resources, and discusses recommendations for avoiding or mitigating these impacts. A 200-foot buffer is used because the fuel modification zone required by the Los Angeles Fire Department extends 200-feet from proposed buildings, and a 200-foot buffer from the parcel edge contains this area and more. The biological resources of the parcel were assessed based on a literature review and a field site survey.

2.1 Project Location

The project site includes 4.6-acres in the Del Rey neighborhood of the City of Los Angeles in Council District 11 (Figure 1). It is located approximately 1,385 feet west of Route 1 and 300 feet south of Route 90. The project is within the U.S. Geological Survey (USGS) Vience 7.5" topographical quad, and within Section 00 of Township 2 North (2N) and Range 15 West (15W).

According to the Los Angeles County Department of Regional Planning Land Use and Zoning online GIS portal (2025), the parcel is zoned as TQM2-1 Light Industrial Zone. As shown in Figure 2, the parcel is in an industrial area with existing businesses and roadways in every direction. Two of the parcels are separated from the third by Centinela Creek Channel that runs east to west through the project site and connects to Ballona Creek just northwest of the study area. The parcel on the north side of the river is undeveloped and the parcel on the south side has a commercial or industrial development on it. The northern parcel is bordered on the north side by route 90 and the southern portion is bordered by Beethoven Street. Photographs of the study area are in Appendix A.



Source: ESRI USA Topo Maps and World Topo Map 2025

5297 and 5300 Beethoven Street

Figure 1. Regional Location

Project Site

Study Area (200-Foot Buffer)

Project Site is within Los Angeles, California, in Los Angeles County on the USGS Venice 7.5-minute quadrangle map in Section 23 of Township 02 South and Range 15 West

Center Coordinate (Decimal Degrees):
Latitude: 33.9795520N Longitude: -118.4227428W



0 1,150 2,300 Feet

Scale: 1:24,000

N

SOUTH ENVIRONMENTAL



Source: ESRI TomTom, Garmin, FAO, NOAA, USGS Aerial Map 2025

5297 and 5300 Beethoven Street

Figure 2. Project Vicinity

- Project Site
- Study Area (200-Foot Buffer)
- California Protected Area Database (CPAD)
- USFWS - National Wetlands Inventory (NWI)

0 115 230 Feet

Scale: 1:2,300

N

SOUTH ENVIRONMENTAL

2.2 Site History

The project site and surrounding area are highly disturbed by development and somewhat disturbed by homeless encampments in the undeveloped areas. The southern side of the channel is developed, and the northern side of the channel is disturbed/non-native grassland. Prior to the development of the bridge for this project, the Centinela Channel was already modified with concrete channelization and heavily disturbed in the surrounding area by development and human activity. While some native vegetation remains in the study area, it has been subject to fuel modification and disturbance prior to this project and is now sparse in comparison to ruderal/ invasive vegetation.

2.3 Existing Physical & Natural Geographic Site Features

Regionally, the project site is east of the Pacific Ocean, southeast of the Santa Monica Mountains, and west of Angeles National Forest. Locally, it is to the north of Los Angeles International Airport. The project site is part of an industrial area along Ballona Creek. The site itself is on a slight slope that increases in altitude from the west to east. The high-elevation is at the eastern region at 16-feet above mean sea level (amsl) and the low elevation is 1-feet amsl at the western region of the project site.

The geology of the site comprises of Surficial Sediments of unconsolidated detrital sediments that are generally undissected. It is characterized as "Alluvial gravel, sand and silt-clay, derived mostly from Santa Monica Mountains; includes gravel and sand of stream channels" (Dibblee 1991). According to the USDA NRCS Soils Database (USDA 2025), there are two soil formations on the parcel. The soil composition on the northern region of the project site is Urban land-Aquic Xerorthents, graded-Pacheco, warm complex Associations that are found on 0 to 2% slopes. The soils complex is often found on alluvial fans and is found on Urban land (65%), Aquic Xerorthents (20%), and Pacheco (%). The soil composition on the southern region is Urban land-Typic Xerorthents, dredged soil complex that is found on 0 to 2% slopes. The soil complex is found on alluvial fans and is found on Urban land (65%), Typic Xerorthents (25%), Bolsa (5%), and Aquic Xerorthents (5%).

2.4 Development

As shown in Figure 3, the completed development included the construction of a private street over a paved easement at 5300 Beethoven Street to 5000 Beethoven Street. This includes a 71-foot long 28-foot-wide free span bridge. The project has 28 piles that are 3 feet wide and approx. 50 feet deep on the north side on the existing paved flood control access road 28 piles 3 feet wide and approx. 50 feet deep in the south side existing paved flood control access road. The bridge is free span and mounted onto the piles and secured. Staging, parking, and access to the site during



Source: ESRI TomTom, Garmin, FAO, NOAA, USGS Aerial Map 2025

5297 and 5300 Beethoven Street

Figure 3. Development Area

- Project Site
- Bridge
- Concrete Pad
- Temporary Grading Impacts

0 41.5 83 Feet

Scale: 1:800

N

SOUTH ENVIRONMENTAL

construction occurred on Beethoven Street and on the northern region of the parcel just north of the bridge. The entire parcel is within a 200-ft radius from existing buildings and will continue to be maintained by removal of groundcover including periodic mowing/weed whacking and pruning of trees up to 6-feet in height. No further work will be undertaken on the bridge.

2.5 Characteristics of the Surrounding Area

The project site is within an industrial area, with business to the south, east and west. Centinela Creek Channel runs through the central region of the site and connects directly to Ballona Creek just west of the study area. The developed areas include businesses with developments and roadways. Additional roadways in the area are Coral Tree Place to the south; Pacific View Drive to the south; McConnell Ave to the east; and W Jefferson Blvd to the south. There are several parks in the area including Culver Marina Fields to the east, Ballona Discovery Park to the south: Fox Hills Park to the west, and Bill Rosendahl De Rey Park to the north. There are commercial and industrial businesses surrounding the project site. Prominent landmarks include the Los Angeles International Airport located approximately 2.40-miles to the south and the SoFi Stadium 4.95-miles to the southeast. The closest highway is Route 90 located approximately 500 feet to the east.

3 Flora Assessment

3.1 Flora Literature Review

The assessment of the flora of the project site began with a review of literature relating to the flora that is known to occur near the study area. The Vegetation Classification of the Santa Monica Mountains and Environs in Ventura and Los Angeles Counties California (California Department of Fish and Wildlife [CDFW], California Native Plant Society [CNPS] 2006) was reviewed to identify the plant communities. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database online (CDFW 2025a) was reviewed to identify special-status plants that have previously been recorded in the United States Geological Survey (USGS) Vience 7.5" quad that the project site is located within, and the six surrounding USGS 7.5" quads: Inglewood, Torrance, Redondo Beach, Topanga, Beverly Hills, and Hollywood. Additional resources that were used in the review:

- Inventory of Rare and Endangered Plants of California online (CNPS 2025b)
- Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC; USFWS 2025).
- Google Earth Historic Aerials (Google 2025)
- Historic Aerials online (historicaerials.com 2025)

3.2 Flora Field Methodology

South Environmental conducted a field reconnaissance of 5297 and 5300 Beethoven Street to identify biological resources including plant communities and plant species. A 200-ft radius from the project site was drawn in ARCGIS to clearly delineate the project site and surrounding buffer study area. Sufficient time was allotted to collect data on the most prevalent plant species present on the project site and the overall survey area. The most important plants were observed and recorded on the survey area and identified to species except for species that could not be identified because of condition (dried out), lack of floral parts, or lack of access to an area (e.g., private property). Plant communities were identified according to A Manual of California Vegetation online (CNPS 2025) and mapped in ArcGIS Pro software.

When applicable, the field surveys complied with the Survey of California Vegetation (SCV) Classification and Mapping Standards (CDFW 2025) and the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Species that could not be identified in the field were identified with digital photos and plant specimens using the Jepson Manual Vascular Plants of California (Baldwin et al., 2012)

and other botanical sources. In areas that were developed prior to our assessment we assume that the existing plant community surrounding the development is the same as what would be found there currently in the absence of the development.

3.3 Flora Data Analysis

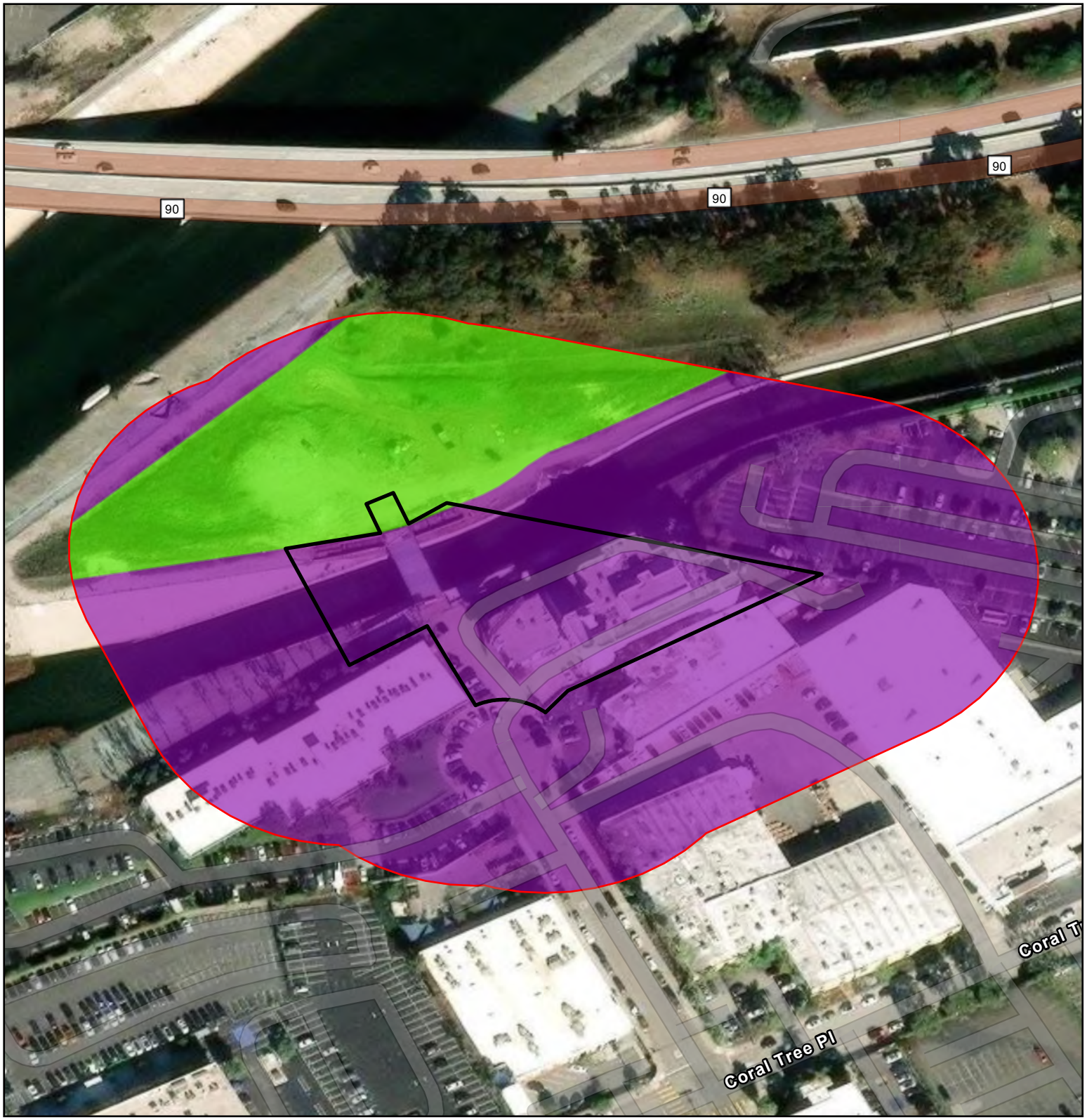
The survey for biological resources including plant communities and plant species at 5297 and 5300 Beethoven Street was conducted on June 2, 2025, during the morning over a period of 1 hour by South Environmental Biologist Dana Briggs. The weather was overcast with a temperature of 65-70° F, no precipitation, and 10mph wind. The plants observed on the project site are listed in Table 1. Species with an asterisk (*) are considered as non-native invasive plants by the California Invasive Plant Council.

Table 1. Summary of Plants on Study Area

Common name	Scientific Name	CRPR	On parcel?
Blackwood acacia	*Acacia melanoxylon*	--	Yes
Candelabra aloe	*Aloe arboresvens*	--	No
Tall kangaroo paw	*Anigozanthos flavidus*	--	No
Coyote brush	*Baccharis pilularis*	--	Yes
Compact brome*	*Bromus madritensis*	--	Yes
Lemon-scented gum	*Corymbia citriodora*	--	No
Carrotwood	*Cupaniopsis anacardiodes*	--	Yes
Tufted hairgrass	*Deschampsia cespitosa*	--	Yes
Cider gum	*Eucalyptus gunnii*	--	Yes
Crown daisy	*Glebionis coronaria*	--	Yes
Shortpod mustard*	*Hirschfeldia incana*	--	Yes
Laurel sumac	*Malosma laurina*	--	Yes
Stone pine	*Pinus pinea*	--	No
Radish	*Raphanus sativus*	--	Yes
Castor bean*	*Ricinus communis*	--	Yes
* = non-native invasive species			

3.3.1 Plant Communities

The study area is made up of one plant community and one cover type as shown in Figure 4 below. Table 2 below summarizes the plant communities and cover type on the study area.



Source: ESRI TomTom, Garmin, FAO, NOAA, USGS Aerial Map 2025

5297 and 5300 Beethoven Street

Figure 4. Plant Communities and Land Cover

- Project Site
- Study Area (200-Foot Buffer)
- Developed / Ornamental Landscaped
- Disturbed Non-Native Grassland

0 90 180 Feet

Scale: 1:1,800

N

SOUTH ENVIRONMENTAL

Table 2. Summary of Plant Communities and Cover Types

Plant Community/Cover Type	Acres on Study Area	Acres on Project Ste	Acres Impacted by Project	Impacts to New Fuel Modification	Global/State Rank
Disturbed/Non-native grassland	2.01	0.03	0.02	0	N/A
Developed / Ornamental Landscaped	7.71	1.38	0.21	0	N/A
Total	**9.72**	**1.41**	**0.23**	**0**	

3.3.1.1 Disturbed/ Non-Native Grassland

A disturbed/non-native grassland occurs on 2.01-acres on the northern region of study area and on 0.02 acres of the project site that was impacted by the bridge development footprint. The community is dominated by compact brome and shortpod mustard in the herbaceous layer. Tufted hairgrass, crown daisy, and radish were also found in the herbaceous layer. The tree and shrub layer was sparse and included blackwood acacia, coyote brush, and laurel sumac. Although some native species were present, there was a much higher cover of non-native/ invasive species. Due to the dense layer of non-native ground cover and development near the site this disturbed ecosystem would not be able to support special-status species due to lack of habitat. This community does not have a global/state ranking therefore, it is not considered a sensitive community.

3.3.1.2 Developed / Ornamental Landscaped

A Developed/Ornamental Landscaped cover type occurs on 7.71 acres of the study area and on 1.38 acres of the project site. The developed area includes surrounding businesses, a school, walkways, etc. and roadways. The only roadway in the study area is Beethoven Street which runs north to south. Landscaped ornamentals include street trees with grass and ornamental species. Species observed included candelabra aloe (*Aloe arborescens)*, tall kangaroo paw (*Anigozanthos flavidus)*, carrotwood (*Cupaniopsis anacardiodes*), cider gum (*Eucalyptus gunnii),* and stone pine (*Pinus pinea)*. This area also includes the developed channel of the river and the open water in the river. Because the channel is entirely concrete there is no plants or natural areas, and only developed areas occur in the channel. Developed and landscaped areas are not considered habitat for native plants and animals.

3.3.2 Special-Status Plants

According to the literature analysis presented in Appendix B, there are 67 special-status plants known to occur in the region. No special-status species were observed on the project site during

the survey in the development area (ruderal and non-native vegetation). There is no new fuel modification proposed so there would be no new impacts within the fuel modification area and no special-status plants are anticipated to occur there due to the level of dense cover of non-native grasses and the highly developed area within the study area. The survey included the entire proposed impact area, and no special-status plants were observed (see list of plants above in Table 1). Also, none were assessed with the potential to occur on the site due to the dominance of non-native grasses or invasive plants that would preclude the establishment of special-status plants in the future. The site is not within designated Critical Habitat for any plant species (USFWS 2025b). Overall, because of the disturbance in the impact area, there is no potential for special-status plant species to occupy the project site and the fuel modification zone is also largely disturbed and no special-status plants were observed there during the survey.

3.3.3 Sensitive Plant Communities

CDFW 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* defines sensitive natural communities as those that are "of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects." CDFW considers a natural community sensitive if it has a Global or State rarity rank of 1-3, which includes communities that are vulnerable (G3/S3), imperiled (G2/S2), and critically imperiled (G1/S1). CDFW uses the alliances and groups described in the Manual of California Vegetation Online to characterize California's natural communities and provides the California Natural Communities List online (most current is dated February 27, 2025) to list the current global and state rarity rank for each natural community characterized in the Manual. The Disturbed/Non-native grassland is not ranked and therefore it is not considered as a sensitive natural community by the CDFW.

3.3.4 Protected Trees

There are no trees in the study area that are required to be protected by the City of Los Angeles Protected Tree and Shrub Ordinance.

3.4 Flora Impacts

3.4.1 Impacts to Plant Communities/Sensitive Natural Communities

As shown in Figure 4 below and summarized in Table 2 above, the construction footprint is primarily within developed/ornamental cover type with some of the development footprint on disturbed non-native grassland. Therefore, the impacts occurred in areas where the landscape was already disturbed and unable to support special-status species and therefore no impacts would

result in habitat for special-status species. There are no new fuel modification areas proposed as the site is within proximity to other developments where existing fuel modification occurs, therefore, no new impacts to plant communities or sensitive natural communities would occur from fuel modification. The project had no impact to habitat for special-status species because none occurs and impact occurred only to ruderal and disturbed non-native grassland areas on the north side of the channel. The remaining areas of impact were to areas that were already developed.

3.4.2 Impacts to Special-Status Plants

No special-status plants were observed on the study area and none have the potential to occur due to the lack of habitat. Therefore, no impacts to special-status species occurred from the project.

3.4.3 Impacts to Protected Trees

As mentioned above, no protected trees were observed on the study area and none are expected to have occurred prior to development based on the current conditions. Therefore, no impacts to protected trees occurred.

3.4.4 Cumulative Impacts to Flora

The project had only a minor impact to non-native grassland/ruderal areas, which are not a significant impact to flora in the region. The project had no impact to special-status plants or habitat because none occurs. Therefore, the project does not contribute to any cumulative impacts to flora in the region.

4 Wildlife Assessment

4.1 Wildlife Literature Review

The assessment of the wildlife of the study area began with a review of literature relating to the fauna that is known to occur near the study area. The CDFW California Natural Diversity Database online (CDFW 2025a) was reviewed to identify special-status animals that have been previously recorded in the United States Geological Survey (USGS) Venice 7.5" quad that the project site is located within, and the six surrounding USGS 7.5" quads: Inglewood, Torrance, Redondo Beach, Topanga, Beverly Hills, and Hollywood. Additional resources that were included in the review:

- United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) (USFWS 2025a)
- CDFW California Wildlife Habitat Relationships (CWHR) life history accounts and range maps online (CDFW 2025b)
- Bird species protected by the Migratory Bird Treaty Act (MBTA)
- Protected Areas for Wildlife & Wildlife Movement Pathways (ESA 2021)

4.2 Wildlife Field Methodology

South Environmental conducted a field visit to 5297 and 5300 Beethoven Street to identify any biological resources present including endangered and threatened wildlife. A 200-ft radius from the project site was drawn in ARCGIS to clearly delineate the project site and surrounding buffer survey area. Data were collected on the most prevalent animals present on the project site and the overall survey area.

Wildlife including mammals, reptiles, amphibians, and birds was observed and recorded on the survey area and identified to species. Animals were detected and identified via direct sighting, scat, calls, or based on discussion with people living in the area. Direct sightings of animals was with the naked eye or with binoculars when necessary. Binoculars were used to try and view wildlife in private areas where access was prohibited. Since wildlife moves swiftly, observation time of the animal was limited in some cases. In these instances identification of the wildlife at the taxonomic level of species was not always possible and the wildlife was identified at the level of genus or animal group (e.g., hummingbird). When a special-status animal was detected, habitat conditions were documented including characterization of the animal's associated vegetative community and abiotic factors (e.g., soils).

Specific survey protocols for mountain lion, monarch butterfly, and also bats were conducted during the field survey and are explained in the *Biologist Statement of Required Review*

Completion and Biological Reporting Standardized Requirements of the City of Los Angeles (2025). These are summarized as follows:

Mountain lion: Specific measures were taken to assess the potential for mountain lion on the site. The site was surveyed for suitable habitat for mountain lion dens entailing a search for thickets, caves, or rocky areas with large natural cavities. Signs of mountain lion presence were searched for including scat and tracks. The potential for mule deer — a common animal preyed on by the mountain lion — habitat on the site was considered. And the connectivity of the site through a wildlife corridor to high-quality habitat and human presence in the area were also considered.

Monarch Butterfly: Specific measures were taken to assess the potential for monarch butterfly to overwinter or breed on the site. To assess the potential for the site to be used as overwinter habitat, the proximity of the site to coastline and freshwater resources and the presence of large-protected trees were the main considerations. For monarch use as breeding habitat, the site was assessed for milkweed presence.

Bats: Specific measures were also taken to assess the potential for special-status bats on the site. The site was assessed for appropriate habitat for bats which includes large trees, cliff faces, rock outcroppings, and structure overhangs. Evidence of bat presence was also considered by searching for signs of dead bats, bat urine and guano. Finally, the site was assessed in terms of whether the habitat of the site or adjacent parcels included foraging areas or water sources.

4.3 Wildlife Data Analysis

4.3.1 Wildlife Observed

During the field visit by South Environmental on June 2, 2025, a few native species known to inhabit the Los Angeles area were observed in the study area and identified. Due to surrounding human disturbance and a lack of habitat, few wildlife were observed. The findings are summarized in Table 2 below. It is expected that many other animals common to urban settings (e.g., raccoon, fox squirrel, opossum) may use the survey area for nesting, foraging, and cover.

Table 2. Summary of Wildlife on Study Area

Common name	Scientific Name	Taxonomic Group	Status
Western gull	*Larus occidentalis*	Bird	-
House sparrow*	*Passer domesticus*	Bird	-
* indicates non-native species			

4.3.2 Protected Areas for Wildlife (PAWs)

Centinela Creek is designated as a Criteria 1 area for the Ballona Creek Protected Area for Wildlife (PAW) in the City's Wildlife District Ordinance (WDO). According to the ESA 2021 PAW Report, the Ballona Creek PAW consists of the concrete-lined channelized portion of Ballona Creek from Centinela Avenue to Lincoln Boulevard; includes open water and patches of marsh habitat; and has a moderate potential to support medium mammals, a low potential to support large mammals, a high potential to support birds, and a moderate potential to support other wildlife species. The bridge is built over Centinela Creek.

4.3.3 Special-Status Wildlife

No special-status animals were observed during the field visit and according to the literature analysis using the CNDDB database and presented in Appendix B, there are 58 special-status animals known to occur in the region. In general, there is considerable disturbance on the site, the ground cover is dense with non-native invasive species and will generally not support special-status wildlife in the impact areas. There is a riverine channel that goes through the study area, but the concrete channelization of the water feature would prevent special-status species from using it as there is no habitat for aquatic species. There is one CNDDB record of mimic tryonia (*Tryonia imitator)* in the study area but is unlikely to occur in the riverine habitat due to the concrete channelization and the lack of brackish water. Due to the disturbance and developments and lack of habitat, it is unlikely for the site to contain any special-status wildlife.

Special-status bats. Bats require roosting areas near foraging sites and a permanent water source. The study area has a water source, but the habitat is disturbed and within a highly developed area fragmented from other native habitats. There were no signs of bat presence, for example, guano deposits or urine stains observed on the site or impact areas. **No potential to occur.**

Mountain lion (*Puma concolor*). The species does not have an endangered or threatened listing at the federal level, but the southern California population is a candidate for listing under the California Endangered Species Act (CESA) at the state level. The mountain lion inhabits a range of habitats including woodland, chaparral, coastal scrub, and occasionally grassland. The species avoids urban areas and human development. The species requires a large range devoid of development for hunting and finding mates for breeding (i.e. establishing a home range). It requires dense vegetation for hunting since it is a predatory ambush animal and surprises prey by hiding in the brush. For mating and denning the mountain lion requires rocky areas, thickets, and caves.

The site has primarily non-native grasses or developed areas, and the mountain lion requires a native community as habitat. Furthermore, there are no denning areas in the ornamental area such as thickets or caves. The mountain lion is also sensitive to human presence which is high in the area. For these reasons it is unlikely mountain lions will inhabit the site and study area for dispersal or foraging, as well as for denning or other home range activities that require larger expanses of habitat. **No potential to occur.**

Monarch butterfly (*Danaus plexippus*). The species is a candidate for federal listing. According to the CNDDB, the species' "winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico", with "roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. "Additionally, for breeding the monarch butterfly requires milkweed plants (*Asclepias* species) for nutrition and hosting cocoons. The site has an ornamental eucalyptus but it is not in a dense strand and therefore the site is not suitable for overwintering. Furthermore, no milkweed was observed on the site that the species could use for breeding. **No potential to occur.**

Migratory Birds: There is the potential for migratory Birds of Conservation Concern (BCC), a designation based on the U.S. Fish and Wildlife Service criteria, to use the site for foraging, cover, or even nesting (USFWS – IPAC 2025a). While migratory in nature, some of these species are also year-round residents in southern California. These species either are not considered rare by the CDFW and therefore are not included in the CNDDB Rarefind database, or they have not been observed within the eight quads that were used as part of the CNDDB query. The following birds considered to be migratory BCC could potentially use the site:

- Allen's hummingbird (*Selasphorous sasin*)
- Black oystercatcher (*Haematopus bachmani)*
- Black skimmer (*Rynchops niger)*
- Black swift (*Cypseloides niger)*
- Black turnstone (*Arenaria melanocephala)*
- Brandt's cormorant (*Phalacrocorax penicullatus)*
- Bullock's Oriole (*Icterus bullockii*)
- California Gull (*Larus californicus)*
- Clark's Grebe (*Aechmophorus clarkia)*
- Common Yellowthroat *(Geothlypis trichas sinuosa)*
- Elegant tern (*Thalasseus elegans)*
- Heermann's Gull (*Larus heermanni)*
- Lawrence's goldfinch (*Carduelis lawrencei)*
- Nuttall's woodpecker (*Picoides nuttallii*)
- oak titmouse (*Baeolophus inornatus*)
- olive-sided flycatcher (*Contopus cooperi*)

- Red knot (*Calidris canutus)*
- Savannah sparrow (*passerculus sandwhichensis)*
- Short-billed dowitcher (*Limnodromus griseus)*
- Western Grebe *(Aechmophorus occidentalis)*
- Western gull (*Larus occidentalis)*
- Western screech-owl (*Megascops kennicottii cardonensis)*
- Willet (*Tringa semipalmata)*
- wrentit (*Chamaea fasciata*)

4.4 Wildlife Project Impacts

The construction footprint of 0.23-acre is on a developed/ornamental landscaped cover type and disturbed non-native grassland, both of which cannot support sensitive wildlife due to lack of habitat. These impacts occurred in disturbed areas where special-status species do not occur, nor would they be impacted by the project. The undeveloped areas were disturbed prior to the project and would not have hosted special-status wildlife. Any native plants present on the parcel are not as prevalent compared to the non-native plant species present, therefore any native species present would not constitute native habitat and would be of low ecological value. No new fuel modification is proposed. Because the project impacts occurred on developed/ landscaped and disturbed/ non-native habitat areas, no impacts to habitat for special-status wildlife.

4.4.1 Impacts to Protected Areas For Wildlife

As established in the WDO, projects involving: construction of a new, standalone building exceeding 500 square feet; additions exceeding 500 square feet; major remodels of a main building on a lot in a Hillside Area; grading in excess of 500 cubic yards; and removal of any Protected Tree, Significant Tree, or tree within the public right-of-way must comply with specific development regulations contained within the WDO. As such, the development regulations of the WDO do not apply to the proposed private access bridge. All projects located on lots identified in the WDO, which includes development of the proposed private access bridge on APN 4211-007-909, would be subject to the regulations for Wildlife Resources contained within the WDO. These regulations require: (1) preparation of a Biological Assessment; and (2) Site Plan Review. Additionally, the bridge plans would be reviewed by the City as part of approval of the requested Private Street Map. Furthermore, the bridge abutments would be installed into existing County of Los Angeles service roads on both sides of Centinela Creek and no portion would extend into the Creek channel. Therefore, the private access bridge would be consistent with the WDO and the Modified Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.

Similarly, the bridge does not impact Centinela Creek in any way and would not alter any PAWs or wildlife movement areas (as described in Section 5.4 below. The project has no impact to the Protected Areas for Wildlife.

4.4.2 Impacts to Special-Status Bats

As described above, the study area is not suitable for roosting bats due to the proximity to development. Therefore, the project would not result in impacts to special-status bats (direct or indirect) because they are absent from the area.

4.4.3 Impacts to Mountain Lions

No special-status wildlife species were observed during the field visit, likely due to the lack of native habitat. As the project will avoid impacts to any native plant communities that could be used by special-status wildlife, there will be no impacts to special-status wildlife. The project will be completed on developed/ornamental landscaped area where no impacts to habitats for species or species themselves would result. Indirect impacts are unlikely as there are no native habitats within 200-feet of the proposed project and no new fuel modification would occur. Therefore, no impacts to special-status wildlife would result from the project.

4.4.4 Impacts to Monarch Butterfly

Because the site is at a distance (>1-mile) from the coast it would not be used for overwintering. And because no milkweed was observed on the site, it would not be used as breeding habitat. Therefore, the project would have no impact on the monarch butterfly, direct or indirect, as it is absent from the area.

4.4.5 Impacts to Nesting Birds

Many common birds and migratory BCC have the potential to nest on the site. The proposed development would require the removal of trees/shrubs that could provide potential nesting habitat for birds protected by the MBTA, MBPA, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest is within immediate proximity to project activities, and this would also be a violation of the MBTA and Fish and Game Code. Because the project was constructed without a survey for nesting birds it is unknown if impacts occurred. If the project impacts began outside the nesting season then no impacts would have resulted. Bird nesting season occurs February 1 through August 31. According to the Los

Angeles Building and Safety timeline construction began May 8, 2023, which is during bird nesting season. Due to the lack of preconstruction nesting bird survey and the project start date, it is unknown if impacts occurred.

4.4.6 Cumulative Impacts to Wildlife

There is no other project known to be currently proposed within 500-feet of the project site. Therefore, the impacts from the project would not be greater than those described in this report as no other impacts to the wildlife within proximity to the project site would be impacted by other projects. Therefore, the project would not result in cumulative impacts beyond the impacts described in this report.

5 Wildlife Movement

5.1 Wildlife Movement Literature Review

The assessment of the potential for wildlife movement to and from the project site consisted of consulting the following resources:

- United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) (USFWS 2025a)
- USFWS Designated and Proposed Critical Habitat GIS data online (USFWS 2025b)
- GreenInfo Network, Park Information online (2025)
- California Protected Areas Database Map online (CPAD 2025)
- South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion (SC Wildlands 2006).

Google Earth online was used to assess the level of connectivity of habitat to the site. The foremost considerations were whether there was a direct connection of high-quality habitat to the site — without interference from development — and whether the connecting habitat linked to large habitat tracts.

5.2 Wildlife Movement Field Methodology

During the South Environmental field visit the project site and surrounding 200-ft survey area were assessed for their potential use as a wildlife corridor or habitat linkage. The level of disturbance of the site and surrounding areas by way of development including roads, house and commercial structures, fences, and lighting were noted as they pertain to the connectivity of the site to high-quality habitat and present potential barriers to movement. The survey area was assessed for the presence of a corridor of linkage of habitat that connects the site to adjacent high-quality habitat. Included in this assessment of a corridor was stream areas or those with unique natural feature (e.g., rock outcrops) which wildlife are known to frequently use as habitat linkages.

5.3 Wildlife Movement Data Analysis

The project site is surrounded by urban development of commercial businesses to the south and on the north is surrounded by freeways. The site has a water feature that could serve as a wildlife corridor for special-status wildlife as described in the ESA 2021 PAWs report, but it has been channelized with concrete banks and the project site is in a highly developed area which they avoid. Nonetheless, this area is designated as a PAW for the potential for shorebirds and other animals to move through Centinela Creek. However, the project site is not within any designated

critical habitat for sensitive species and the creek lacks native habitats because it is entirely developed with concrete bottom. While the channel could be used by wildlife during movement to and from the Pacific Ocean and Ballona Wetlands, the channel on the site is only developed and leads only to developed areas. Therefore, it does not connect habitats for wildlife and only leads wildlife into existing developments that are undesirable and lack habitat. Therefore, the channel the bridge goes over would not be considered a wildlife movement area.

5.4 Wildlife Movement Project Impacts

The project is constructed in a highly developed area that is set adjacent to businesses with roadways and freeways surrounding it. The disturbed/non-native grassland is not of high value for wildlife movement and no wildlife would be expected to move through areas immediately adjacent to the property. The channel on the project site is concrete lined and developed entirely, and does not provide habitat connectivity and would not be considered a valuable wildlife movement corridor despite the PAW designation. Nonetheless, if it were to be used by local, common wildlife species and shorebirds that would be found in Ballona Creek habitat the bridge did not block the movement within this area and did not disrupt any potential movement as there is no blockage such as fencing or lighting from the project that would deter wildlife from using this area. Therefore, the project had no impact on wildlife movement.

5.5 Cumulative Impacts to Wildlife Movement

The project had no impact on wildlife movement areas and therefore, did not contribute to the cumulative impact to wildlife movement in the region.

6 Water Resources

6.1 Water Resources Literature Review

The assessment of the potential for water resources on the project site consisted of consulting the following resources:

- National Wetlands Inventory online (USFWS 2025c)
- National Hydrography Dataset online (USGS 2025)

6.2 Water Resources Field Methodology

During the South Environmental field visit the survey area was inspected for the presence of potential jurisdictional features such as wetlands, streams, lakes, or other water features. No formal delineation of jurisdictional waters was performed, only a preliminary investigation was conducted. The survey was conducted by observing the landscape across the survey area and looking for the presence of water and topographic depressions that are associated with dense vegetation.

6.3 Water Resources Data Analysis

Based on the field visit and the literature review, there is a concrete flood control channel (Centinela Creek Channel) that runs east to west in the middle of the project site. The bridge was constructed over this channel. This channel is comprised of artificial concrete substrate, lacks vegetation, is permanently flooded, and connects to a major waterway, Ballona Creek, just northwest of the study area. Ballona Creek is a 29.53-acre riverine feature that is permanently flooded with tidal fluctuations and connects to the coast and other wetland habitats. This channel has direct connection to the Pacific Ocean that is located approximately one mile downstream. This channel is likely under the jurisdiction of the CDFW, California State Water Resources Control Board (SWRCB), and the US Army Corps of Engineers.

6.4 Impacts to Water Resources

The project included construction of a concrete bridge over the Centinela Creek Channel. Because the project includes impacts only to areas outside the channel, there were no direct impacts to the channel from the project. Based on the observations during the survey and the photographs in Appendix A, the project was constructed on top of the existing channel and made no alterations to the concrete sides of the channel occurred, and the channel remains fully intact. Because the project was completed without impacts to the concrete bed or bank of the channel it did not have any direct impacts to jurisdictional areas and no permits would be required as a result. The project

implemented Best Management Practices to control pollutants or sediments from entering the channel during construction and all equipment and materials were staged outside of the channel. During construction the site was under ongoing inspections by the Los Angeles Department of Building and Safety. This is a requirement when a permit is issued. You are to have proper trash containers for materials to be disposed of. There were ongoing inspections by the City of Los Angeles Building and Safety field inspectors to ensure no debris entered the water area and or the flood control channel. The inspections took place approx. every 10 to 15 days during the entire time of construction of the access bridge.

Because the project avoided direct and indirect impacts to the channel, no impacts occurred to jurisdictional features or to water quality.

6.5 Cumulative Impacts to Water Resources

The project avoided impacts to water resources and therefore, did not contribute to any cumulative impacts to water resources in the region.

7 Applicable Regulations and Permits

7.1 Regulations

7.1.1 Federal Regulations

7.1.1.1 Clean Water Act Sections 404 and 401

Section 404 of the Clean Water Act (CWA) establishes a program to regulate the discharge of dredged and fill material into waters of the United States (U.S.), including wetlands. Activities in waters of the U.S. or wetlands regulated under this program include fill as a result of projects such as development, water resource projects (such as dams and levees), infrastructure development and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the U.S.

Section 401 of the CWA requires that any person applying for a federal permit or license which may result in a discharge of pollutants into waters of the United States (such as a Clean Water Act Permit under Section 404), must obtain a state water quality certification stating that the activity complies with all applicable water quality standards, limitations, and restrictions. No license or permit may be issued by a federal agency until certification required by section 401 has been Granded or waived.

7.1.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects individuals as well as any part, nest, or eggs of any bird listed as migratory. In practice, federal permits issued for activities that potentially impact migratory birds typically have conditions that require pre-disturbance surveys for nesting birds. In the event nesting is observed, a buffer area with a specified radius must be established, within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., presence of busy roads, intervening topography, etc.), and is based on the professional judgment of a monitoring biologist. A list of migratory bird species protected under the MBTA is published by USFWS.

7.1.2 California Regulations

7.1.2.1 California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

An Initial Study (IS) is prepared when a proposed action is determined to be a "project" under CEQA. The IS is a checklist that asks specific questions about the project's level of environmental impacts in many categories, including biological resources. The checklist includes a series of questions to determine the projects level of potential impacts in each of the categories. Potential level of impact includes: No Impacts, Less Than Significant Impact, Less Than Significant with Mitigation Incorporated, and Potentially Significant Impact. For projects that have no impact or less than significant impact a Negative Declaration is prepared, for those with Less Than Significant with Mitigation Incorporated prepare a Mitigated Negative Declaration, and for those with a Potentially Significant Impact prepare an Environmental Impact Report (EIR).

7.1.2.2 Porter-Cologne Water Quality Control Act

The Porter-Cologne Act requires the adoption of water quality control plans (basin plans) that give direction to managing water pollution in California. The basin plans get adopted and administered by the Regional Water Quality Control Board (RWQCB). The plans incorporate the beneficial uses of the waters of the State and then provide objectives that should be met to maintain and protect these uses. Along with the Regional Water Boards, the State Water Resources Board can issue and enforce permits containing waste discharge requirements to maintain clean surface water and groundwater. Each basin plan identifies the specific beneficial uses of water in their region for the past, present, and future. These basin plans also all have objectives for which the plan clearly states steps that are being taken or will be taken to meet the objectives. These objectives are created for the purpose of keeping the water clean and safe to use beneficially. The Regional Board has the authority to give out permits for the purpose of waste disposal or waste assimilation.

7.1.2.3 Waters of the State (WSC) 401 Water Quality Certification

The RWQCB regulates activities pursuant to Section 401(a)(1) of the CWA. Section 401 of the CWA specifies that certification from the State is required for any applicant requesting a federal license or permit including a Section 404 permit. The RWQCB's delegated authority over Section 401 requires a Water Quality Certification consistent with the USACE of Engineers definition of waters of the US.

The State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State was adopted in April 2020 and put into effect statewide on May 28, 2020 (State Water Resources Control Board [SWRCB] 2020a). The Water Boards define wetlands as follows:

"An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

The Water Code defines Waters of the State of California (WSC) broadly to include "any surface water or groundwater, including saline waters, within the boundaries of the state." In the 2020 state wetland definition, the State did not define non-wetland WSC, rather they are relying on regional characterizations of jurisdiction was delegated to the Regional Boards.

The following wetlands are WSC based on the 2020 Procedures:

1. Natural wetlands;
2. Wetlands created by modification of a surface water of the state; and
3. Artificial wetlands that meet any of the following criteria:
    a. Approved by an agency as compensatory mitigation for impacts to other WSC, except where the approving agency explicitly identifies the mitigation as being of limited duration;
    b. Specifically identified in a water quality control plan as a wetland or other water of the state;
    c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape; or
    d. Greater than or equal to one acre in size, unless the artificial wetland was constructed, and is currently used and maintained, primarily for one or more of the following purposes (i.e., the following artificial wetlands are not WSC unless they also satisfy the criteria set forth in 2, 3a, or 3b):
        i. Industrial or municipal wastewater treatment or disposal;
        ii. Settling of sediment;

iii. Detention, retention, infiltration, or treatment of stormwater runoff and other pollutants or runoff subject to regulation under a municipal, construction, or industrial stormwater permitting program,
iv. Treatment of surface waters;
v. Agricultural crop irrigation or stock watering;
vi. Fire suppression;
vii. Industrial processing or cooling;
viii. Active surface mining – even if the site is managed for interim wetlands functions and values;
ix. Log storage;
x. Treatment, storage, or distribution of recycled water;
xi. Maximizing groundwater recharge (this does not include wetlands that have incidental groundwater recharge benefits); or
xii. Fields flooded for rice growing.

All artificial wetlands that are less than 1 acre in size and do not satisfy the criteria set forth in 2, 3.a, 3.b, or 3.c are not WSC.

7.1.2.4 State of California Fish and Game Code Section 1600

Fish and Game Code Section 1602 outlines the Lake and Streambed Alteration Agreement (LSAA) permitting process, and states:

- An entity shall not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake

Fish and Game Code Section 1602 requires any entity (defined as any person, State or local governmental agency, or public utility) to notify the CDFW before beginning any activity that will do one or more of the following:

- substantially divert or obstruct the natural flow of and river, stream, or lake, or
- substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

A permit, known as a Lake or Streambed Alteration Agreement, from CDFW is required to conduct any of the activities described above.

7.1.2.5 State of California Fish and Game Code Section 3500

Section 3503.5 of the California Fish and Game Code states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Activities that result in the abandonment of an active bird of prey nest may also be considered in violation of this code. In addition, California Fish and Game Code, Section 3511 prohibits the taking of any bird listed as fully protected, and California Fish and Game Code, Section 3515 states that is it unlawful to take any non-game migratory bird protected under the MBTA.

7.1.2.6 California Migratory Bird Protection Act

The California Migratory Bird Protect Act (MBPA) was enacted in September 2019 to reinforce the MBTA at the state level. The Act states:

- "It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.) before January 1, 2017, any additional migratory nongame bird that may be designated in that federal act after that date, or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act before January 1, 2017, or subsequent rules or regulations adopted pursuant to that federal act, unless those rules or regulations are inconsistent with this code." This section is inactive on January 20, 2025, and the following language below will be adopted.

- "It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.), or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act." This section is operative starting on January 20, 2025

7.1.3 Local and Regional Regulations

7.1.3.1 City of Los Angeles Protected Tree/Shrub Ordinance (#186,873)

The City of Los Angeles Protected Tree Ordinance states that no protected tree or shrubs shall be relocated or removed (or damaged resulting in death) without a permit. The application for a permit shall indicate "the location of each protected tree or shrub, and shall identify each protected tree or shrub proposed to be retained, relocated or removed." With certain restrictions, a tree or shrub may be removed or relocated if it prevents reasonable development of the

property, shows a substantial decline in vigor, is in danger of falling, will interfere with existing utilities or roadway infrastructure, or has no aesthetic value. For each protected tree or shrub removed or relocated, four native replacement trees or shrubs, respectively, must be planted, whereby each one must be "at least 15-gallon or larger, measuring one inch or more in diameter one foot above the base, and be not less than 7 feet in height measured from the base." Protected and shrubs trees include the following native species which measure "four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree" (City of Los Angeles 2021):

- Indigenous oak trees in the genus Quercus except for scrub oak (*Quercus berberidifolia*).
- California walnut (*Juglans californica*)
- western sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- Mexican elderberry (*Sambucus mexicana*)
- Toyon (*Heteromeles arbutifolia*)

8 Conclusions

According to the findings in this report the construction of a private bridge over a concrete channel at 5300 Beethoven Street to 5000 Beethoven Street avoided significant impacts on biological resources according to CEQA.

Plant Communities/Sensitive Natural Communities/Wildlife Habitat: The construction footprint is primarily within developed/ornamental cover type with some of the development footprint on disturbed non-native grassland. Therefore, the impacts occurred in areas where the landscape was already disturbed and unable to support special-status species and therefore no impacts occurred to habitat for special-status species. There are no sensitive natural communities on the project site and no impacts occurred. There are no new fuel modification areas proposed as the site is within proximity to other developments where existing fuel modification occurs, therefore, no new impacts would occur from fuel modification. The project had no impact to habitat for special-status species because none occurs and impact occurred only to ruderal and disturbed non-native grassland areas on the north side of the channel. The remaining areas of impact were to areas that were already developed. Therefore, the project had no impact to habitat for special-status species or sensitive natural communities.

Special-Status Plants: No special-status plants were observed on the study area and none have the potential to occur due to the lack of habitat. Therefore, no impacts to special-status species occurred from the project.

Protected Trees: No protected trees were observed on the study area and none are expected to have occurred prior to development based on the current conditions. Therefore, it is likely no impacts to protected trees occurred.

Protected Areas for Wildlife: Centinela Creek is designated as a Criteria 1 area for the Ballona Creek Protected Area for Wildlife (PAW) in the City's Wildlife District Ordinance (WDO). According to the ESA 2021 PAW Report, the Ballona Creek PAW consists of the concrete-lined channelized portion of Ballona Creek from Centinela Avenue to Lincoln Boulevard; includes open water and patches of marsh habitat; and has a moderate potential to support medium mammals, a low potential to support large mammals, a high potential to support birds, and a moderate potential to support other wildlife species. The bridge is built over Centinela Creek.

As established in the WDO, projects involving: construction of a new, standalone building exceeding 500 square feet; additions exceeding 500 square feet; major remodels of a main building on a lot in a Hillside Area; grading in excess of 500 cubic yards; and removal of any Protected Tree, Significant Tree, or tree within the public right-of-way must comply with specific

development regulations contained within the WDO. As such, the development regulations of the WDO do not apply to the proposed private access bridge. All projects located on lots identified in the WDO, which includes development of the proposed private access bridge on APN 4211-007-909, would be subject to the regulations for Wildlife Resources contained within the WDO. These regulations require: (1) preparation of a Biological Assessment; and (2) Site Plan Review. Additionally, the bridge plans would be reviewed by the City as part of approval of the requested Private Street Map. Furthermore, the bridge abutments would be installed into existing County of Los Angeles service roads on both sides of Centinela Creek and no portion would extend into the Creek channel. Therefore, the private access bridge would be consistent with the WDO and the Modified Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.

Similarly, the bridge does not impact Centinela Creek in any way and would not alter any PAWs or wildlife movement areas (as described in Section 5.4 below. The project has no impact to the Protected Areas for Wildlife.

Special-Status Wildlife: The construction footprint of 0.23-acre is on a developed/ornamental landscaped cover type and disturbed non-native grassland, both of which cannot support sensitive wildlife due to lack of habitat. These impacts occurred in disturbed areas where special-status species do not occur, nor would they be impacted by the project. The undeveloped areas were disturbed prior to the project and would not have hosted special-status wildlife. Any native plants present on the parcel are not as prevalent compared to the non-native plant species present, therefore any native species present would not constitute native habitat and would be of low ecological value. No new fuel modification is proposed. Because the project impacts occurred on developed/ landscaped and disturbed/ non-native habitat areas, no impacts to habitat for special-status wildlife.

Based on the analysis in this report, the site does not support special-status bats, mountain lion, or monarch butterfly due to lack of habitat. Therefore, there will be no impact from the project on this wildlife.

Many common birds and migratory BCC have the potential to nest on the site. The proposed development would require the removal of trees/shrubs that could provide potential nesting habitat for birds protected by the MBTA, MBPA, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest is within immediate proximity to project activities, and this would also be a violation of the MBTA and Fish and Game

Code. The project began construction in May of 2023 during bird nesting season. Because the project was constructed without a survey for nesting birds it is unknown if impacts occurred.

Wildlife Movement: The project is constructed in a highly developed area that is set adjacent to businesses with roadways and freeways surrounding it. The disturbed/non-native grassland is not of high value for wildlife movement and no wildlife would be expected to move through areas immediately adjacent to the property. The channel on the project site is concrete lined and entirely developed and does not provide habitat connectivity and would not be considered a valuable wildlife movement corridor. Nonetheless, if it were to be used by local, common wildlife species that would be found in developed areas the bridge did not block the movement within this area and did not disrupt any potential movement as there is no blockage such as fencing or lighting from the project that would deter wildlife from using this area. Therefore, the project had no impact on wildlife movement.

Water Resources: The project included construction of a concrete bridge over the Centinela Creek Channel. Because the project includes impacts only to areas outside the channel, there were no direct impacts to the channel from the project. Based on the observations during the survey and the photographs in Appendix A, the project was constructed on top of the existing channel and made no alterations to the concrete sides of the channel, and the channel remains fully intact. Because the project was completed without impact on the concrete bed or bank of the channel it did not have any direct impacts to jurisdictional areas and no permits would be required as a result. The project implemented Best Management Practices to control pollutants or sediments from entering the channel during construction and all equipment and materials were staged outside of the channel. Proper trash containers for materials to be disposed of were onsite during construction. There were ongoing inspections by the City of Los Angeles Building and Safety field inspectors to ensure no debris entered the water area or the flood control channel. The inspections took place approx. every 10 to 15 days during the entire time of construction of the access bridge. Because the project avoided direct and indirect impacts to the channel, no impacts occurred to jurisdictional features or to water quality.

Cumulative Impacts: The project likely had no impact on biological resources in the region because the developed area lacked native habitats, was heavily disturbed, was not a movement area, and the bridge avoided impacts to jurisdictional areas. Because the project avoided impacts to biological resources it did not contribute to the cumulative impacts to biological resources in the region.

9 References

California Department of Fish and Game and California Native Plant Society. 2006. Vegetation Classification of the Santa Monica Mountains National Recreation Area and Environs in Ventura and Los Angeles Counties California, Sacramento, California.

California Department of Fish and Wildlife (CDFW). 2025a. California Natural Diversity Database (CNDDB) (available by subscription) and Rarefind. Sacramento, California. Accessed online: https://wildlife.ca.gov/Data/CNDDB

CDFW. 2025b. California Wildlife Habitat Relationships (CWHR) life history accounts and range maps. Accessed online: bu

CDFW. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed online: Accessed online: https://wildlife.ca.gov/Conservation/Survey-Protocols

California Native Plant Society. 2025b. Inventory of Rare and Endangered Plants of California. California Native Plant Society. Accessed online: http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi

California Protected Areas Database (CPAD). 2025. Database Map. Accessed online: https://www.calands.org/

City of Los Angeles. 2021. Los Angeles Protected Tree/Shrub Ordinance (#186873). Los Angeles, California. Effective February 4, 2021.

City of Los Angeles. 2006. LA CEQA Thresholds Guide. Accessed online: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

County of Los Angeles. 2025. Los Angeles County Department of Regional Planning Land Use and Zone online GIS. http://planning.lacounty.gov/znet

Dibblee, T.W. 1991. Geologic Map of Beverly Hills and South ½ Van Nuys Quadrangles, Los Angeles, California. Dibblee Geology Center & Santa Barbara Museum of Natural History, Santa Barbara, California.

Environmental Science Associates (ESA). 2021. Protected Areas for Wildlife & Wildlife Movement Pathways. Prepared for the Los Angeles City Planning.

GreenInfo Network, Park Information online (2025) Accessed online: https://www.greeninfo.org

L. Newman Design Group. 2020 (rev.) Protected Tree Report for 3915 Hollyline Avenue, Los Angeles, California.

SC Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion.

United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS). 2025. Web Soil Survey Mapper. Accessed online: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm

United States Fish and Wildlife Service (USFWS). 2025a. Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC). Accessed online: https://ecos.fws.gov/ipac/

USFWS. 2025b. Dedicated and Proposed Critical Habitat GIS Data. Accessed online: https://www.fisheries.noaa.gov/national/endangered-species-conservation/critical-habitat#critical-habitat-designations,-maps,-and-gis-data

USFWS. 2025c. National Wetlands Inventory Online Wetlands Mapper. Accessed online: https://www.fws.gov/wetlands/data/mapper.html

United States Geological Service (USGS). 2025. National Hydrography Dataset (NHD) The National Map Viewer. Accessed online: https://viewer.nationalmap.gov/services/

Appendix A:
Photograph Exhibit



Image 1). View towards project site on Beethoven Street, facing north.



Image 2). View from project site on Beethoven Street, facing south



Image 3). View of 5300 Beethoven Street, facing north.



Image 4). View from the end of Beethoven Street, facing northwest, towards the northern end of the study area.

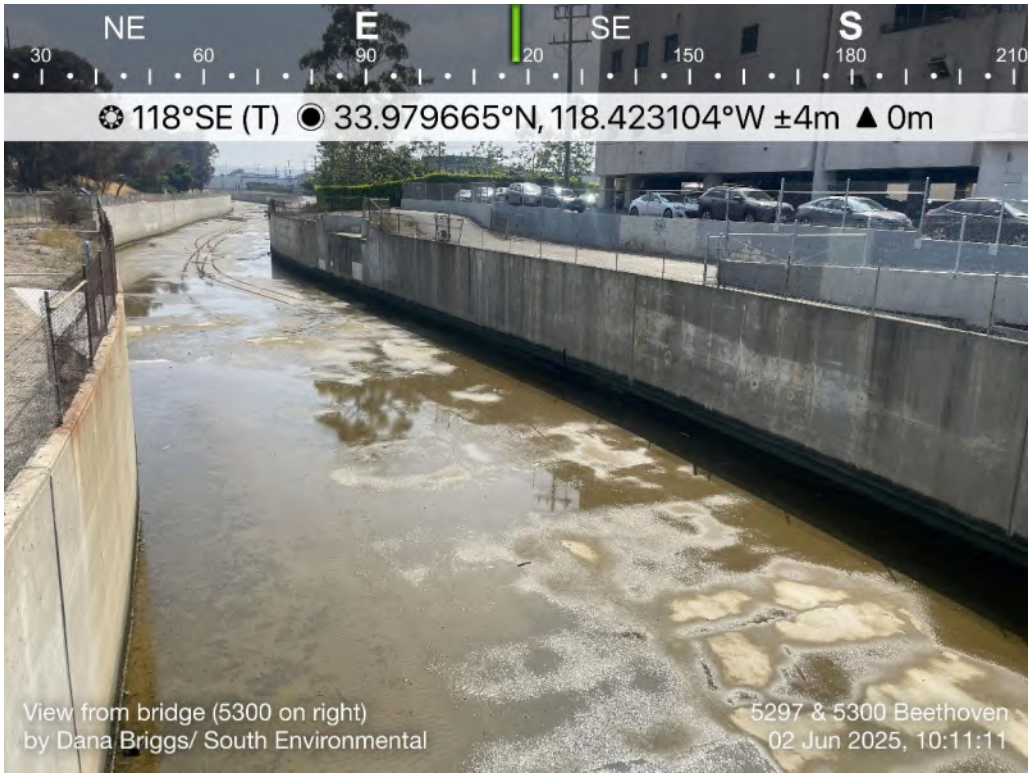


Image 5). View of the flood channel, facing southeast.



Image 6). View of the northern region of the project site, facing northeast.



Image 7). View from the pad coming off of the bridge, facing north.



Image 8). View of the northern region of the project site, facing northeast.



Image 9). View of the northern region of the project site, facing west.



Image 10). View of the western region of the project site, facing west.



Image 11). View from the western end of the project site, facing east.



Image 12). View from the northeastern region of the project site, facing west.



Image 13). View of the bridge, facing northwest.



Image 14). View of the bridge, facing south.



Image 15). Historical image of the project site in September 2021 (Google Earth 2025).



Image 16). Historical image of the project site in July 2023 prior to bridge development (Google Earth 2025).

Appendix B:
Special-Status Species Analysis

Special-Status Species Analysis

Special-status species are those plants and animals that, because of their recognized rarity or vulnerability to various causes of habitat loss or population decline, are recognized by federal, state, or other agencies as under threat from human-associated developments. Some of these species receive specific protection that is defined by federal or state endangered species legislation. Others have been designated as special-status based on adopted policies and expertise of state resource agencies or organizations with acknowledged expertise, or policies adopted by local governmental agencies such as counties, cities, and special districts to meet local conservation objectives. Special-status species include:

- Plants or wildlife listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the federal Endangered Species Act or the California Endangered Species Act;
- Plants or wildlife that meet the definitions of rare or endangered under CEQA Guidelines Section 15380.
- Plants or wildlife covered under an adopted NCCP/HCP;
- Plants considered by the California Native Plant Society (CNPS) to be rare, threatened, or endangered (List 1A, 1B and 2 plants) in California;
- Plants listed by the CNPS as plants in which there is limited information about distribution (List 3);
- Plants listed as rare under the California Native Plant Protection Act (Fish and Game Code 1900 et seq.);
- Wildlife designated by CDFW as species of special concern;
- Wildlife "fully protected" in California (California Fish and Game Code Sections 3511, 4700, and 5050); and
- Wildlife protected by the Migratory Bird Treaty Act (MTBA).

9.1.1 Federally-Protected Status

All references to Federally-protected species in this BRA include the most current published status or candidate category to which each species has been assigned by USFWS. For purposes of this assessment the following acronyms are used for Federal status species, as applicable:

FE Federally-listed as Endangered

FT Federally-listed as Threatened
FPE Federally proposed for listing as Endangered
FPT Federally proposed for listing as Threatened
FPD Federally proposed for delisting
FC Federal candidate species (former C1 species)

9.1.2 State-Protected Status

For the purposes of this BRA, the following acronyms are used for State status species, as applicable:

SE State-listed as Endangered
ST State-listed as Threatened
SR State-listed as Rare
SCE State candidate for listing as Endangered
SCT State candidate for listing as Threatened
SFP State Fully Protected
SSC California Species of Special Concern

9.1.3 California Rare Plant Rank

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of special-status species in California. CNPS has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California (CNPS 2018). The list serves as the candidate list for listing as Threatened and Endangered by CDFW. CNPS has developed six categories of rarity known as the California Rare Plant Rank (CRPR), of which Ranks 1A, 1B, 2A, and 2B are particularly considered sensitive:

Rank 1A Presumed extinct in California.
Rank 1B Plants Rare, Threatened, or Endangered in California and elsewhere.
Rank 2A Presumed extinct in California, but more common elsewhere.
Rank 2B Plants Rare, Threatened, or Endangered in California, but more common elsewhere.
Rank 3 Plants about which we need more information – a review list.
Rank 4 Plants of limited distribution – a watch list.

The CNPS recently added "threat ranks" which parallel the ranks used by the CNDDB. These ranks are added as a decimal code after the CNPS List (e.g., Rank 1B.1). The threat codes are as follows:

.1 Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat);

.2 Moderately threatened in California (20-80% occurrences threatened);

.3 Not very threatened in California (<20% of occurrences threatened or no current threats known).

9.1.4 Potential to Occur Assessment

Special-status species that are **present** or are **high** or **medium** potential to occur within the parcel are a based on one or more of the following:

- the direct observation of the species within the parcel during any field survey;
- a record reported in the CNDDB; and
- the parcel is within known distribution of a species and contains appropriate habitat.
- present means the species is known to occur, high potential indicates the habitat is ideal and near known occurrences of the species, and medium indicates that the habitat may be less than ideal due to some lacking element but still usable by the species and within the known range.

Special-status species that are **low** potential) to occur are based on one of the following:

- the parcel has the general habitat types but lacks necessary habitat elements such as suitable microhabitat or soils; or
- the parcel is outside the known elevation range or distribution of the species, and has otherwise suitable habitats;

Special-status species that have no potential to occur on the parcel are labeled as **none** due to the absence of suitable habitat.

Special-Status Plants

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Abronia maritima	Red sand-verbena	None	None	4.2	Feb-Nov	0	330	Coastal dunes		None. The site lacks habitat for the species.
Aphanisma blitoides	Aphanisma	None	None	1B.2	Feb-Jun	5	1000	Coastal bluff scrub, Coastal dunes, Coastal scrub	Gravelly (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Arenaria paludicola	marsh sandwort	CE	FE	1B.1	May-Aug	10	560	Marshes and swamps	Openings, Sandy	None. The site lacks habitat for the species.
Astragalus brauntonii	Braunton's milk-vetch	None	FE	1B.1	Jan-Aug	15	2100	Chaparral, Coastal scrub, Valley and foothill grassland	Burned areas (sometimes), Carbonate, Disturbed areas (sometimes), Sandstone (usually)	None. The site lacks the habitat for the species
Astragalus pycnostachyus var. lanosissimus	Ventura Marsh milk-vetch	CE	FE	1B.1	(Jun)Aug-Oct	1	35	Coastal dunes, coastal scrub, marshes and swamps (edges, coastal slat, brackish)		None: This project site lacks the habitat this species requires.
Astragalus tener var. titi	coastal dunes milk-vetch	CE	FE	1B.1	Mar-May	5	165	Coastal bluff scrub, Coastal dunes, Coastal prairie	Mesic (often), Vernally Mesic (often)	None. The site lacks habitat for the species.
Atriplex coulteri	Coulter's saltbush	None	None	1B.2	Mar-Oct	10	1510	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland	Alkaline (sometimes), Clay (sometimes)	None. The site lacks habitat for the species.
Atriplex pacifica	south coast saltscale	None	None	1B.2	Mar-Oct	0	460	Coastal bluff scrub, Coastal dunes, Coastal scrub, Playas		None. The site lacks habitat for the species.
Atriplex parishii	Parish's brittlescale	None	None	1B.1	Jun-Oct	80	6235	Chenopod scrub, Playas, Vernal pools	Alkaline	None. The site lacks habitat for the species.
Atriplex serenana var. davidsonii	Davidson's saltscale	None	None	1B.2	Apr-Oct	35	655	Coastal bluff scrub, Coastal scrub	Alkaline	None. The site lacks habitat for the species.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Berberis nevinii	Nevin's barberry	CE	FE	1B.1	(Feb)Mar-Jun	230	2705	Chaparral, Cismontane woodland, Coastal scrub, Riparian scrub	Gravelly (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Berberis nevinii	Nevin's barberry	None	None	4.2	(Jan)Mar-Jun	230	2705	Chaparral, Cismontane woodland, Coastal scrub, Riparian scrub	Gravelly (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Calandrinia breweri	Brewer's calandrinia	None	None	4.2	(Jan)Mar-Jun	35	4005	Chaparral, Coastal scrub	Burned areas, Disturbed areas, Loam (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Calochortus clavatus var. gracilis	slender mariposa-lily	None	None	1B.2	Mar-Jun(Nov)	1050	3280	Chaparral, Coastal scrub, Valley and foothill grassland		None. The site lacks the habitat this species requires.
Calochortus palmeri var. palmeri	Palmer's mariposa-lily	None	None	1B.2	Apr-Jul	2330	7840	Chaparral, Coastal scrub, Valley and foothill grassland	Mesic	None. The site lacks the habitat this species requires.
Calochortus plummerae	Plummer's mariposa-lily	None	None	4.2	May-Jul	330	5580	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland	Granitic, Rocky	None. The site lacks habitat for the species.
Calystegia felix	lucky morning-glory	None	None	1B.1	Mar-Sep	100	705	Meadows and seeps, Riparian scrub	Alkaline (sometimes), Loam (sometimes), Silt (sometimes)	None: This site lacks the habitat this species requires.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Calystegia peirsonii	Peirson's morning-glory	None	None	4.2	Apr-Jun	100	4920	Chaparral, Chenopod scrub, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland		None. The site lacks habitat for the species.
Camissoniopsis lewisii	Lewis' evening-primrose	None	None	3	Mar-May(Jun)	0	985	Cismontane woodland, Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland	Clay (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Centromadia parryi ssp. australis	Southern tarplant	None	None	1B.1	May-Nov	0	1575	Marshes and swamps (margins), Valley and foothill grassland (vernally mesic), Vernal pools		None. The site lacks habitat for the species.
Centromadia pungens ssp. laevis	Smooth tarplant	None	None	1B.1	Apr-Sep	0	2100	Chenopod scrub, Meadows and seeps, Playas, Riparian woodland, Valley and foothill grassland	Alkaline	None. The site lacks habitat for the species.
Cercocarpus betuloides var. blancheae	island mountain-mahogany	None	None	4.3	Feb-May	100	1970	Chaparral, Closed-cone coniferous forest		None. The site lacks habitat for the species.
Chaenactis glabriuscula var. orcuttiana	Orcutt's pincushion	None	None	1B.1	Jan-Aug	0	330	Coastal bluff scrub (sandy), Coastal dunes		None. The site lacks habitat for the species.
Chenopodium littoreum	Coastal goosefoot	CE	FE	1B.2	Apr-Aug	35	100	Coastal dunes		None. The site lacks habitat for the species.
Chloropyron maritimum ssp. maritimum	salt marsh bird's-beak	CE	FE	1B.2	May-Oct(Nov)	0	100	Coastal dunes, Marshes and swamps		None. The site lacks habitat for the species.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	CE	None	1B.1	Apr-Jul	490	4005	Coastal scrub, Valley and foothill grassland		None. The site lacks habitat for the species.
Cistanthe maritima	Seaside cistanthe	None	None	4.2	(Feb)Mar-Jun(Aug)	15	985	Coastal bluff scrub, Coastal scrub, Valley and foothill grassland	Sandy	None. The site lacks habitat for the species.
Convolvulus simulans	Small-flowered morning-glory	None	None	4.2	Mar-Jul	100	2430	Chaparral (openings), Coastal scrub, Valley and foothill grassland	Clay, Seeps, Serpentine	None. The site lacks habitat for the species.
Deinandra paniculata	Paniculate tarplant	None	None	4.2	(Mar)Apr-Nov	80	3085	Coastal scrub, Valley and foothill grassland, Vernal pools	Sandy (sometimes), Vernally Mesic (usually)	None. The site lacks habitat for the species.
Dichondra occidentalis	Western dichondra	None	None	4.2	(Jan)Mar-Jul	165	1640	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland		None. The site lacks habitat for the species.
Dithyrea maritima	Beach spectaclepod	CT	None	1B.1	Mar-May	10	165	Coastal dunes, Coastal scrub (sandy)		None. The site lacks habitat for the species.
Dudleya cymose ssp. ovatifolia	Santa Monica dudleya	None	FT	1B.1	Mar-Jun	490	5495	Chaparral, Coastal scrub	Rocky, Volcanic (sometimes)	None. The site lacks habitat for the species.
Dudleya multicaulis	many-stemmed dudleya	None	None	1B.2	Apr-Jul	50	2590	Chaparral, Coastal scrub, Valley and foothill grassland	Clay (often)	None. The site lacks the habitat for this species.
Dudleya virens ssp. insularis	Island green dudleya	None	None	1B.2	Apr-Jun	15	985	Coastal bluff scrub, Coastal scrub	Rocky	None. The site lacks habitat for the species.
Eryngium aristulatum var. parishii	San Diego button-celery	CE	FE	1B.1	Apr-Jun	65	2035	Coastal scrub, Valley and foothill grassland, Vernal pools	Mesic	None. The site lacks habitat for the species.
Erysimum suffrutescens	Suffrutescent wallflower	None	None	4.2	Jan-Jul(Aug)	0	490	Chaparral (maritime), Coastal bluff scrub, Coastal dunes, Coastal scrub		None. The site lacks habitat for the species.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Galium cliftonsmithii	Santa Barbara bedstraw	None	None	4.3	May-Jul	655	4005	Cismontane woodland		None. The site lacks habitat for the species.
Helianthus nuttallii ssp. parshii	Los Angeles sunflower	None	None	1A	Aug-Oct	35	5005	Marshes and swamps (freshwater, coastal salt)		None. The site lacks the habitat for this species.
Hordeum intercedens	Vernal barley	None	None	3.2	Mar-Jun	5	1000	Coastal dunes, coastal scrub, valley and foothill grassland (depressions, saline flats), vernal pools		None. The site lacks habitat for the species.
Horkelia cuneata var. puberula	mesa horkelia	None	None	1B.1	Feb-Jul(Sep)	230	2660	Chaparral, Cismontane woodland, Coastal scrub	Gravelly (sometimes), Sandy (sometimes)	None. The site lacks habitat for the species.
Isocoma menziesii var. decumbens	Decumbent goldenbush	None	None	1B.2	Apr-Nov	35	820	Chaparral, Coastal scrub (often disturbed areas, sandy)		None. The site lacks habitat for the species.
Juglans californica	Southern California black walnut	None	None	4.2	Mar-Aug	165	2955	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland		None. The site lacks habitat for the species.
Juncus acutus ssp. leopoldii	Southwestern spiny rush	None	None	4.2	(Mar)May-Jun	10	2955	Coastal dunes (mesic), Coastal scrub, Marshes and swamps (coastal salt), Meadows and seeps (alkaline seeps)		None. The site lacks habitat for the species.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	None	None	1B.1	Feb-Jun	5	4005	Marshes and swamps, Playas, Vernal pools		None. The site lacks habitat for the species.
Lepechinia fragrans	fragrant pitcher sage	None	None	4.2	Mar-Oct	65	4300	Chaparral		None. The site lacks habitat for the species.
Lilium humboldtii ssp. ocellatum	ocellated Humboldt lily	None	None	4.2	Mar-Jul(Aug)	100	5905	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Riparian woodland	Openings	None. The site lacks habitat for the species.
Lycium brevipes var. hassei	Santa Catalina Island Desert-thorn	None	None	3.1	Jun(Aug)	215	985	Coastal bluff scrub, Coastal scrub		None. The site lacks habitat for the species.
Lycium californicum	California box-thorn	None	None	4.2	Mar-Aug(Dec)	15	490	Coastal bluff scrub, Coastal scrub		None. The site lacks habitat for the species.
Monardella hypoleuca ssp. hypoleuca	White-veined monardella	None	None	1B.3	(Apr)May-Aug(Sep-Dec)	165	5005	Chaparral, Cismontane woodland		None. The site lacks habitat for the species.
Mucronea californica	California spineflower	None	None	4.2	Mar-Jul(Aug)	0	4595	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub, Valley and foothill grassland	Sandy	None. The site lacks habitat for the species.

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
Nama stenocarpa	mud nama	None	None	2B.2	Jan-Jul	15	1640	Marshes and swamps		None. The site lacks habitat for the species.
Nasturtium gambelii	Gambel's water cress	CT	FE	1B.1	Apr-Oct	15	1085	Marshes and swamps		None. The site lacks habitat for the species.
Navarretia fossalis	Spreading navarretia	None	FT	1B.1	Apr-Jun	100	2150	Chenopod scrub, Marshes and swamps (shallow freshwater), Playas, Vernal pools		None. The site lacks habitat for the species.
Navarretia prostrata	prostrate vernal pool navarretia	None	None	1B.2	Apr-Jul	10	3970	Coastal scrub, Meadows and seeps, Valley and foothill grassland, Vernal pools	Mesic	None. The site lacks habitat for the species.
Orcuttia californica	California Orcutt grass	CE	FE	1B.1	Apr-Aug	50	2165	Vernal pools		None. The site lacks habitat for the species.
Pelazoneuron puberulum var. sonorense	Sonoran maiden fern	Nonw	None	2B.2	Jan-Sep	50	610	Meadows and seeps (seeps, streams)		None. The site lacks habitat for the species.
Pentachaeta lyonii	Lyon's pentachaeta	CE	FE	1B.1	(Feb)Mar-Aug	100	2265	Chaparral (openings), Coastal scrub, Valley and foothill grassland	Clay, Rocky	None. The site lacks habitat for the species.
Phacelia hubbyi	Hubby's phacelia	None	None	4.2	Apr-Jul	0	3280	Chaparral, Coastal scrub, Valley and foothill grassland	Gravelly, Rocky, Talus	None. The site lacks habitat for the species.
Phacelia ramosissima var. austrolitoralis	South coast branching phacelia	None	None	3.2	Mar-Aug	15	985	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt)	Rocky (sometimes), Sandy	None. The site lacks habitat for the species.
Phacelia stellaris	Brand's star phacelia	None	None	1B.1	Mar-Jun	5	1310	Coastal dunes, Coastal scrub		None. The site lacks habitat for the species.
Potentilla multijuga	Ballona cinquefoil	None	None	1A	Jun-Aug	0	5	Meadows and seeps (brackish)		None. The site lacks habitat for the species.
Pseudognaphalium leucocephalum	white rabbit-tobacco	None	None	2B.2	(Jul)Aug-Nov(Dec)	0	6890	Chaparral, Cismontane woodland, Coastal	Gravelly, Sandy	None. The site lacks habitat for the species..

Scientific Name	Common Name	CESA	FESA	CRPR	Blooming Period	Elevation Low (ft)	Elevation High (ft)	Habitat	Micro Habitat	Potential to Occur on the Study area
								scrub, Riparian woodland		
Quercus dumosa	Nuttall's scrub oak	None	None	1B.1	Feb-Apr(May-Aug)	50	1310	Chaparral, Closed-cone coniferous forest, Coastal scrub	Clay, Loam, Sandy	None. The site lacks the habitat for the species.
Sidalcea neomexicana	salt spring checkerbloom	None	None	2B.2	Mar-Jun	50	5020	Chaparral, Coastal scrub, Lower montane coniferous forest, Mojavean desert scrub, Playas	Alkaline, Mesic	None. The site lacks the habitat for the species.
Suaeda esteroa	Estuary seablite	None	None	1B.2	Mar-Jun	0	15	Marshes and swamps (coastal salt)		None. The site lacks habitat for the species.
Suaeda taxifolia	Woolly seablite	None	None	4.2	Jan-Dec	0	165	Coastal bluff scrub, Coastal dunes, Marshes and swamps (coastal margins)		None. The site lacks habitat for the species.
Symphyotrichum defoliatum	San Bernardino aster	None	None	1B.2	Jul-Nov	5	6695	Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Marshes and swamps, Meadows and seeps, Valley and foothill grassland	Streambanks	None. The site lacks habitat for the species.
Symphyotrichum greatae	Greata's aster	None	None	1B.3	Jun-Oct	985	6595	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Riparian woodland	Mesic	None. The site lacks habitat for the species.

Special-Status Animals

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Spea hammondii	western spadefoot	Amphibians	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | IUCN_NT-Near Threatened	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands.	Vernal pools are essential for breeding and egg-laying.	None. The site lacks habitat for the species.
Socalchemmis gertschi	Gertsch's socalchemmis spider	Arachnids	None	None		Known from only 2 localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon.		None. The site is not within the two localities from which the species is known.
Agelaius tricolor	Tricolor blackbird	Birds	None	Threatened	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_EN-Endangered USFWS_BCC-Birds of Conservation Concern	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California.	Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Aimophila ruficeps canescens	southern California rufous-crowned sparrow	Birds	None	None	CDFW_WL-Watch List	Resident in Southern California coastal sage scrub and sparse mixed chaparral.	Frequents relatively steep, often rocky hillsides with grass and forb patches.	None: This site lacks the habitat required.
Athene cunicularia	burrowing owl	Birds	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern | USFWS_BCC-Birds of Conservation Concern	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	None. The site lacks habitat for the species.
Buteo swainsoni	Swainson's hawk	Birds	None	Threatened	BLM_S-Sensitive | IUCN_LC-Least Concern	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees.	Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	None: This site lacks the habitat required.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Chardadrius nivosus nivosus	Western snowy plover	Birds	Threatened	None	CDFW_SSC-Species of Special Concern	Sandy beaches, salt pond levees and shores of large alkali lakes.	Needs sandy, gravelly or friable soils for nesting.	None: This site lacks the habitat required.
Coccyzus americanus occidentalis	Western yellow-billed cuckoo	Birds	Threatened	Endangered	BLM_S-Sensitive USFS_S-Sensitive	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems.	Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	None. This site lacks the habitat required.
Coturnicops noveboracensis	yellow rail	Birds	None	None	CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern | NABCI_RWL-Red Watch List | USFS_S-Sensitive | USFWS_BCC-Birds of Conservation Concern	Summer resident in eastern Sierra Nevada in Mono County.	Freshwater marshlands.	None. The site lacks habitat for the species.
Empidonax traillii extimus	southwestern willow flycatcher	Birds	Endangered	Endangered	NABCI_RWL-Red Watch List	Riparian woodlands in Southern California.		None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Laterallus jamaicensis coturniculus	California black rail	Birds	None	Threatened	BLM_S-Sensitive CDFW_FP-Fully Protected IUCN_EN-Endangered	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays.	Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	None. The site lacks habitat for the species.
Passerculus sandwichensis beldingi	Belding's savannah sparrow	Birds	None	Endangered	USFWS_BCC-Birds of Conservation Concern	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County.	Nests in Salicornia on and about margins of tidal flats.	None. The site lacks habitat for the species.
Pelecanus occidentalis californicus	California brown pelican	Birds	Delisted	Delisted	BLM_S-Sensitive USFS_S-Sensitive	Colonial nester on coastal islands just outside the surf line.	Nests on coastal islands of small to moderate size which afford immunity from attack by ground-dwelling predators. Roosts communally.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Polioptila californica californica	Coastal California gnatcatcher	Birds	Threatened	None	CDFW_SSC-Species of Special Concern	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California.	Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	None. The site lacks habitat for the species.
Riparia riparia	bank swallow	Birds	None	Threatened	BLM_S-Sensitive | IUCN_LC-Least Concern	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert.	Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	None. The site lacks the habitat for the species.
Sternula antillarum browni	California least tern	Birds	Endangered	Endangered	CDFW_FP-Fully Protected	Nests along the coast from San Francisco Bay south to northern Baja California	Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, land fills, or paved areas.	None. The site lacks the habitat for the species.
Vireo bellii pusillus	least Bell's vireo	Birds	Endangered	Endangered	IUCN_NT-Near Threatened | NABCI_YWL-Yellow Watch List	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft.	Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Streptocephalus woottoni	Riverside fairy shrimp	Crustaceans	Endangered	None	IUCN_EN-Endangered	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub.	Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	None. This site lacks habitat for the species.
Oncorhynchus mykiss irideus pop. 10	Steelhead-southern California DPS	Fish	Endangered	Candidate Endangered	AFS_EN-Endangered	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County).	Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.	None. This site lacks habitat for the species.
Siphateles bicolor mohabensis	Mohave tui chub	Fish	Endangered	Endangered	AFS_EN-Endangered CDFW_FP-Fully Protected	Endemic to the Mojave River basin, adapted to alkaline, mineralized waters.	Needs deep pools, ponds, or slough-like areas. Needs vegetation for spawning.	None. This site lacks habitat for the species.
Aglaothorax longipennis	Santa Monica shieldback katydid	Insect	None	None	IUCN_CR-Critically Endangered	Occur nocturnally in chaparral and canyon stream bottom vegetation, in the Santa Monica Mtns of Southern California.	Inhabit introduced iceplant and native chaparral plants.	None. This site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Bombus crotchii	Crotch bumble bee	Insects	None	Candidate Endangered	IUCN_EN-Endangered	Coastal California east to the Sierra-Cascade crest and south into Mexico.	Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	None: The site lacks the food genera this species requires
Bombus pensylvanicus	American bumble bee	Insects	None	None	IUCN_VU-Vulnerable	Coastal prairie Great Basin grassland Valley & foothill grassland	Long-tongued; forages on a wide variety of flowers including vetches (Vicia), clovers (Trifolium), thistles (Cirsium), sunflowers (Helianthus), etc. Nests above ground under long grass or underground. Queens overwinter in rotten wood or underground.	None: The host plants for the species were not observed on this site.
Brennania belkini	Belkin's dune tabanid fly	Insects	None	None	IUCN_VU-Vulnerable	Sand obligate species known from coastal dunes near Playa del Rey and El Segundo south to Ensenada, Mexico. One of few tabanids not requiring a blood meal for seccessful egg production; adults taken on flowers.	Larvae collected 50 cm beneath surface of sandy soil; presumably burrowing predators with undetermined hosts, likely beetle larvae. Adult flight generally May - July.	None. This site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Cicindela hirticollis gravida	sandy beach tiger beetle	Insects	None	None		Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico.	Clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.	None. The site lacks habitat for the species.
Cicindela latesignata	Western beach tiger beetle	Insects	None	None		Mudflats and beaches of coastal estuaries from San Diego County to Los Angeles County.	Typically inhabit wet or dry sandy beaches and mud, sand, or salt flats.	None. The site lacks habitat for the species.
Cicindela senillis frosti	Senile tiger beetle	Insects	None	None		Inhabits marine shoreline, from Central California coast south to salt marshes of San Diego. Also found at Lake Elsinore.	Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Coelus globosus	globose dune beetle	Insects	None	None	IUCN_VU-Vulnerable	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico.	Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.	None. The site lacks habitat for the species.
Danaus plexippus pop. 1	monarch - California overwintering population	Insects	Candidate	None	USFS_S-Sensitive	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico.	Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	None. While there was eucalyptus found on site, it is not a dense stand or suitable habitat and lacks milkweed for a breeding population.
Eugnosta busckana	Busck's gallmoth	Insects	None	None		Coastal southern California.	Tiny micro-moth (1 cm) with larva forming galls on host plant Encelia californica (California brittlebush). Adult flight period is during winter, generally from November to February, and have been reported at UV lights and porch lights.	None: This site lacks the habitat required.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Euphilotes allyni	El Segundo blue butterfly	Insects	Endangered	None		Restricted to remnant coastal dune habitat in Southern California.	Host plant is Eriogonum parvifolium; larvae feed only on the flowers and seeds; used by adults as major nectar source.	None. The site lacks habitat for the species.
Glaucopsyche lygdamus palosverdesensis	Palos Verdes blue butterfly	Insects	Endangered	None		Restricted to the cool, fog-shrouded, seaward side of Palos Verdes Hills, Los Angeles County.	Host plant is Astragalus trichopodus var. lonchus (locoweed).	None. The site lacks habitat for the species.
Habroscelimorpha gabbii	Western tidal-flat tiger beetle	Insects	None	None		Inhabits estuaries and mudflats along the coast of Southern California.	Generally found on dark-colored mud in the lower zone; occasionally found on dry saline flats of estuaries.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Onychobaris langei	Lange's El Segundo Dune weevil	Insects	None	None		Known from El Segundo Dunes.		None. The site lacks habitat for the species.
Panoquina errans	Wandering (=saltmarsh) skipper	Insects	None	Noen		Southern California coastal salt marshes	Requires moist saltgrass for larval development.	None. The site lacks habitat for the species.
Pelochrista hennei	Henne's ecuosman moth	Insects	None	None		Coastal sand dunes with host Phacelia ramosissima. Originally believed to be endemic to the El Segundo sand dunes of Los Angeles County where the type specimen was collected. Also collected from coastal San Luis Obispo County.	Larval foodplant is Phacelia ramosissima var austrolitoralis; larvae can be found on woody stems and upper root parts.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Rhaphiomidas terminates terminates	El Segundo flower-loving fly	Insects	None	None		Presumed extinct but recently discovered on Malaga Dunes, Los Angeles County.	Perched dunes.	None. The site lacks habitat for the species.
Trigonoscuta Dorothea Dorothea	Dorthy's El Segundo Dune weevil	Insects	None	None		Coastal sand dunes in Los Angeles County.		None. The site lacks habitat for the species.
Antrozous pallidus	pallid bat	Mammals	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern | USFS_S-Sensitive | WBWG_H-High Priority	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	None: This site lacks the habitat required.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Eumops perotis californicus	western mastiff bat	Mammals	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | WBWG_H-High Priority	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.	Roosts in crevices in cliff faces, high buildings, trees and tunnels.	None. The site lacks habitat for the species.
Lasionycteris noctivagans	silver-haired bat	Mammals	None	None	IUCN_LC-Least Concern | WBWG_M-Medium Priority	Primarily a coastal and montane forest dweller, feeding over streams, ponds and open brushy areas.	Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes, and rarely under rocks. Needs drinking water.	None. The site lacks roosting habitat for the species.
Lasiurus cinereus	hoary bat	Mammals	None	None	IUCN_LC-Least Concern | WBWG_M-Medium Priority	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	None: This site lacks the roosting habitat required.
Microtus californicus stephensi	south coast marsh vole	Mammals	None	None	CDFW_SSC-Species of Special Concern	Tidal marshes in Los Angeles, Orange and southern Ventura counties.		None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Nyctinomops femorosaccus	Pocketed free-tailed bat	Mammals	None	None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc.	Rocky areas with high cliffs.	None. The site lacks habitat for the species.
Nyctinomops femorosaccus	Big free-tailed bat	Mammals	None	None	CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern	Low-lying arid areas in Southern California.	Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	None: This site lacks the roosting habitat required.
Perognathus longimembris pacificus	Pacific pocket mouse	Mammals	Endangered	None	CDFW_SSC-Species of Special Concern	Inhabits the narrow coastal plains from the Mexican border north to El Segundo, Los Angeles County.	Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.	None. The site lacks habitat for the species.
Sorex ornatus salicornicus	Southern California saltmarsh shrew	Mammals	None	None	CDFW_SSC-Species of Special Concern	Coastal marshes in Los Angeles, Orange and Ventura counties.	Requires dense vegetation and woody debris for cover.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Taxidea taxus	American badger	Mammals	None	None	CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	None. The site lacks friable soils and open ground.
Glyptostoma gabrielense	San Gabriel chestnut	Mollusks	None	None		Terrestrial.		None: This site isn't in the location this species has been found.
Gonidea angulata	western ridged mussel	Mollusks	None	None		Primarily creeks and rivers and less often lakes. Originally in most of state, now extirpated from Central and Southern California.		None. The site lacks habitat for the species and it is believed to be extirpated in the region.
Tryonia imitator	Mimic tryonia (=California brackishwater snail)	Mollusks	None	None	IUCN_DD-Data Deficient	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County.	Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.	Present. This species has been recorded within the study area on CNDDB but is unlikely to occur due to the concrete channelization of the water feature.
Actinemys pallida	Southwestern pond turtle	Reptiles	Proposed Threatened	None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_VU-Vulnerable USFS_S-Sensitive	Requires water source		None. This site lacks the habitat required.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Anniella stebbinsi	Southern California legless lizard	Reptiles	None	None	CDFW_SSC-Species of Special Concern | USFS_S-Sensitive	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County.	Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	None. The site lacks habitat for the species.
Aspidoscelis tigris stejnegeri	coastal whiptail	Reptiles	None	None	CDFW_SSC-Species of Special Concern	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas.	Ground may be firm soil, sandy, or rocky.	None. The site lacks the habitat required
Diadophis punctatus modestus	San Bernardino ringneck snake	Reptiles	None	None	USFS_S-Sensitive	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams.	Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.	None. The site lacks habitat for the species.

Scientific Name	**Common Name**	**Taxonomic Group**	**Federal Listing**	**State Listing**	**Other Status**	**General Habitat**	**Microhabitat**	**Potential to Occur on the Study Area**
Phrynosoma blainvillii	coast horned lizard	Reptiles	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	None. The site lacks habitat for the species.
Thamnophis hammondii	two-striped gartersnake	Reptiles	None	None	BLM_S-Sensitive | CDFW_SSC-Species of Special Concern | IUCN_LC-Least Concern | USFS_S-Sensitive	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation.	Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	None. The site lacks microhabitat for the species.
Thamnophis sirtalis pop.1	South coast grater snake	Reptile	None	None	CDFW_SSC-Species of Special Concern	Southern California coastal plain from Ventura County to San Diego County, and from sea level to about 850 m.	Marsh and upland habitats near permanent water with good strips of riparian vegetation.	None. The site lacks the microhabitat required.

Appendix C:
Literature Review

The **Special-Status Flora and Wildlife** that are subject to the legislation, policies, or assessments indicated in Appendix B (Special-Status Species) are queried for each project site using several online literature resources: two ma

Special-Status Flora and Wildlife

- California Department of Fish and Wildlife, California Natural Diversity Database (CNDDB), Rarefind 5 link CNDDB Maps and Data (ca.gov)

- United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) link https://ecos.fws.gov/ipac/

Special-Status Flora

- Online database of the California Native Plant Society, Inventory of Rare and Endangered Plants link CNPS Rare Plant Inventory.

Special-Status Wildlife

- CDFW. 2025b. California Wildlife Habitat Relationships (CWHR) life history accounts and range maps link https://wildlife.ca.gov/Data/CWHR/Life-History-and-Range

The designation of **Plant Communities** is dependent on the geographic area where the project site occurs. In Southern California, there are two primary vegetation community classification systems. These community classifications also indicate whether the community is considered a sensitive natural community by the CDFW. These two main literature sources area as follows:

- Vegetation Classification of the Santa Monica Mountains National Recreation Area and Environs in Ventura and Los Angeles Counties California (CDFG, CNPS 2006)

- California Native Plant Society (CNPS), A Manual of California Vegetation Online link http://vegetation.cnps.org/

The potential for **Wildlife Movement** at a project site is assessed with several sources that cover geographic connectivity in terms of current development, established wildlife corridors, critical habitat established by the Fish and Wildlife Service, and federal, state, and local protected areas including parks, forests, and reserves. The sources queried for wildlife movement are listed below:

- California Protected Areas Database (CPAD) online link https://www.calands.org/
- GreenInfo Network, Park Information online link https://www.greeninfo.org
- Google Maps, online link https://maps.google.com
- SC Wildlands, South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion.
- US Fish and Wildlife Service Dedicated and Proposed Critical Habitat GIS Data online link https://www.fisheries.noaa.gov/national/endangered-species-conservation/critical-habitat#critical-habitat-designations,-maps,-and-gis-data

The potential for **Water Resources**, for example wetlands, streams, rivers, marshes, on the project site was assessed with two literature sources. These water sources may be U.S. jurisdictional water resources subject to state and federal regulations or not.

- US Fish and Wildlife Service. National Wetlands Inventory Online Wetlands Mapper link https://www.fws.gov/wetlands/data/mapper.html
- US Geological Survey. National Wetlands Inventory Online Wetlands Mapper link https://www.fws.gov/wetlands/data/mapper.html

Appendix D:
Biologist's Resume and Biologists Statement

APPLICATIONS

BIOLOGICAL REPORTING STANDARDS ACKNOWLEDGMENT

ACKNOWLEDGMENT OF COMPLIANCE

Biological report preparers must sign and include the following acknowledgment in the report:

I attest that I meet the requirements for a Qualified Biologist and California Department of Fish and Wildlife (CDFW) qualifications for botanical field surveyors, both as defined in the Biological Reporting Standards document (CP-4074).

I attest that the creation of the Biological Resources Report complied with all the following standardized requirements in the Biological Reporting Standards document (CP-4074), unless explicitly noted otherwise. Any deviations from the above standards have been detailed and justified in the Biological Resources Report.

Name of Lead Biologist Matthew R. South

Lead Biologist Signature  **Date** 7/29/25

Names of Additional Biologists Dana Briggs

Company Name & Contact Information

South Environmental LLC

msouth@southenvironmental.com

Email: msouth@southenvironmental.com
Mobile: 303-818-3632

Matthew South

PRINCIPAL BIOLOGIST

Matthew South founded South Environmental in 2018. He is a certified wildlife biologist with over 18 years of professional experience providing natural resources consulting services for a wide variety of clients that include residential, commercial, government, utility, infrastructure, research, and non-profit projects. For the last 15 years, Mr. South has been an environmental consultant in southern California acting as a Wildlife Biologist and Geographic Information System (GIS) Analyst. In early 2018 he started South Environmental and has since been supporting clients in Los Angeles, Ventura, Santa Barbara, San Bernardino, and Riverside Counties.

Mr. South's background in ecology has led to a passion for conservation planning and resources assessments for the purpose of preservation and management. The integration of the latest technologies such as advanced GIS systems, mobile computing, and drone sensing allows him to innovate new data collection, analysis, and collaboration tools for the environmental sciences that produce more accurate data and better-informed resource managers.

EXPERTISE

- **Conservation and Management Planning.** Mr. South's has extensive experience preparing mitigation and monitoring plans, habitat conservation plans, and technical biological resources management plans that are compliant with federal, state, and local regulations. Mr. South is the only active NRCS TSP for Fish and Wildlife Plans Certified in California.
- **Biological Resources Assessment.** Mr. South has completed dozens of biological resources assessments throughout southern California.
- **Rare Plants and Arborist Services.** Mr. South has surveyed and assessed thousands of native and landscaped trees in southern California. He is a certified arborist with 5-years of tree survey experience working closely with some of the most experienced arborists in California. In addition, he has performed hundreds of hours of rare plant surveys and habitat assessments.
- **Wetland & Jurisdictional Delineations.** Mr. South has conducted dozens of jurisdictional and wetland delineations per the guidelines and methods from the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the state Regional Water Quality Control Boards (RWQCB).
- **GIS.** Mr. South is an expert at spatial data collection and analysis using ESRI mobile and desktop software products and Trimble hardware.

EDUCATION

B.S., Wildlife Ecology, University of Wisconsin-Madison, 2004

CERTIFICATIONS

Certified Wildlife Biologist, The Wildlife Society 2014

Certified Technical Service Provider (TSP) for Fish and Wildlife Management Plans, USDA NRCS 2017

Authorized Desert Tortoise Biologist – Numerous BOs

Unmanned Aircraft System Pilot Certification, FAA #4177603

TRAINING

Wetland Delineation Training Course – The Wetland Institute (2014)

Southwest Willow Flycatcher Workshop, 2017

USGS Desert Tortoise Health Assessment and Tissue Collection Techniques Training, 2009

SELECT PROJECT EXPERIENCE

St. Andrews Recreation Center Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to conduct a Biological Resources Assessment (BRA) and Tree Survey Report for the St. Andrew's Recreation Center at 8701 S St. Andrew's Place in the City of Los Angeles, California for development on one parcel (Assessor's Identification Number [AIN] 6036-009-900) owned by the City of Los Angeles and administered by the Department of Recreation and Parks (RAP). The parcel (study area) is in the Empowerment Congress Southwest Area Neighborhood Council in the south-central part of the City and within the South Los Angeles Community Plan Area. This report identified sensitive or protected biological resources on the parcel and indicated the regulations governing these resources. The biological resources of the parcel was assessed based on a literature review and a field site survey. The Tree Report included a description of the survey area; methods used to survey the trees involving assessment of tree structure, health, and mapping; and the results of the survey including photographs of each tree.

Bronson Canyon Playground Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to prepare a BRA, jurisdictional delineation, and rare plant survey for the City of Los Angeles RAP Bronson Canyon Playground Project located at 3200 Canyon Drive in the City of Los Angeles, California, for the proposed construction of a playground and access improvements including a new pedestrian walkway on a parcel owned by the City of Los Angeles in Griffith Park with the Assessor's Identification Number [AIN] 5583-025-900. The BRA identified and assessed the potential impacts to sensitive or protected biological resources on the project site (development areas and associated work areas), indicated the regulations governing these resources, and discussed recommendations for avoiding or mitigating these impacts. The biological resources of the project site were assessed based on a literature review and a field site survey.

Bell Creek Brush Clearance Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to prepare an Invasive Plant Treatment and Monitoring Plan (plan) detailing the proposed actions to compensate for the temporary impacts to plant communities from the Bell Creek Brush Clearance Project under a Lake and Streambed Alteration Agreement. The implementation of the plan was consistent with measures included in that agreement, including measure 2.22 regarding invasive species management being conducted to ensure protection of the existing wildlife habitat. Implementation of clearance activities under the plan were designed to reduce the presence of and prevent the spread of non-native and invasive plant species within the Bell Creek area. The plan outlined monitoring and treatment methods to control the spread of non-native and invasive plant species in the project treatment areas and identified priority species and priority treatment areas to focus efforts and resources toward achieving the final success criteria. The biological resources of the parcel were assessed based on a literature review and a field site survey.

Various Locations, WEAP Trainings and Nesting Bird Surveys, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to provide Worker Environmental Awareness and Protection (WEAP) Trainings, field survey, monitoring, and reporting, for several City of Los Angeles RAP locations. South Environmental prepared a contractor education brochure in English and Spanish that provided information on protecting nesting birds and included pictures of sensitive plants and wildlife (particularly bats) occurring within the project areas. South Environmental also conducted environmental awareness training to Department inspectors, contractors, and subcontractors at the project site prior to the start of brush clearance activities. South Environmental also conducted as-needed nesting bird surveys, established buffer zones, and performed biological monitoring in response to the presence of active



nests. A brief letter report to RAP was prepared to document field observations, protective measures implemented, and the overall success of the measures.

Sepulveda Basin Prescribed Burn Project, City of Los Angeles Department of Recreation, Los Angeles, California (2022). South Environmental was retained to prepare a burrowing owl survey report for use by the City of Los Angeles RAP for the proposed prescribed burning of approximately 86.49 acres of undeveloped areas on the Sepulveda Basin Apollo XI/Valley Fliers Airfield and adjacent lands. Several active burrowing owl (*Athene cunicularia*) burrows were identified in October 2021 (survey area) during general surveys conducted to support the project in the early planning phase. This report was prepared according to Appendix C and Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation. The report included a description of the project, biological setting, vegetation communities, survey methodology, and survey results that include burrowing owl behavior observations, and recommendations for project implementation that would avoid impacts to burrowing owls and active burrows.

Various Biology Reports within City of Los Angeles (2019-present). Mr. South has prepared and overseen the preparation of dozens of biological resources assessment reports within the City of Los Angeles. These reports are prepared within the range of the population of mountain lions that is the target of the listing status, in the Santa Monica Mountains, San Gabriel Mountains, Simi Hills, and Verdugo Hills. Numerous other projects have been completed that are not listed. Select Projects include:

- Baseline Road in LaVerne
- Altadena Hills Project
- 16 Beverly Park
- 64 Beverly Park
- 74 Beverly Park
- 79 Beverly Park
- Toyopa Drive
- Mapleton Drive
- Tigertail
- 680 Sarbonne
- 777 Sarbonne
- Stradella Road
- Tower Grove
- Bella Drive
- Chautauqua Boulevard
- Benedict Canyon
- Haslam Terrace
- Summitridge Drive
- Rial Lane
- Outpost Ave
- Pasquera
- Beverly Grove
- Multiple Granito Drive Projects
- Floral and Electra Drive Project
- Hillside
- Magnolia
- Swallow
- Sierra Mar
- Beverly Grove
- Stradella
- Chalon Road
- Moraga
- Brentridge
- Viewcrest
- Old Chimney Road
- Multiple Developments on Mulholland Highway
- Berkley Hall School Project
- Charmel Lane
- Paseo Miramar Roadway Project
- Posetano-Revello Project
- Palmera
- Shadow Mountain Drive
- Astral Project
- Nofral Road Projects
- San Onofre Drive
- Crescent Drive

Email: dbriggs@southenvironmental.com
Mobile: 714-330-6290

EDUCATION

B.S., Ecology, Evolution, & Organismal Biology, California State University, Monterey Bay, 2017

M.S., Conservation and Restoration Science, University of California, Irvine, 2022

SKILLS

-Scientific collection and management of field data

-Technical writing

-Project management and risk assessment

-Plant and animal identification through dichotomous keys, field guides, and experience

-Statistical analyses through R Studio

CERTIFICATIONS

-Wilderness First Aid Certification

Dana Briggs Wyler

BIOLOGIST

Dana Briggs Wyler is a current environmental professional and recent graduate from University of California, Irvine's Masters in Conservation and Restoration Science program. Here, she specialized in project management, restoration design, and field monitoring in areas with sensitive species. She has extensive field data collection and restoration experience in central and southern California learned while in school. While at UCI, she was involved with a project monitoring a fuel modification zone using native plant species to support regional biodiversity, especially Least Bell's Vireo and California Gnatcatcher. She also participated in a restoration and monitoring program of native grasslands in Irvine aimed to provide data for community resilience to fire. More recently, she worked for Southern California Coastal Water Research Project as a toxicologist where she conducted research and assessments of southern California's water resources.

EXPERTISE

- **Field Data Collection.** Dana has extensive experience collecting data in diverse terrestrial and aquatic habitats in both southern and central California.
- **Biological Monitoring.** Dana has diverse experience identifying wildlife species throughout the Southern California region.
- **Plant Identification.** Dana is proficient in identifying native, non-native, and invasive plant species throughout southern California, specifically in coastal, wetland, riparian, and chaparral.
- **Technical Writing.** Dana has prepared numerous biological resource assessments reports for the city of Los Angeles. Reports include detail-oriented descriptions of biological resources, surveys for special-status species, biological resources maps, and assessments of potential impacts to biological resources from development.
- **Data Management and Analysis.** Dana has significant expertise in statistical analyses as well as producing statistical figures through R Studio. She has extensive experience working with both single data sets as well as large databases.

SELECT PROJECT EXPERIENCE

South Environmental, Monitoring Biologist. Ramona Expressway (2023-present). As a Biologist for South Environmental, Dana's responsibilities were to provide WEAP trainings and biological monitoring for the Ramona Expressway project with First Carbon. Duties included:

- Conduct Worker Environmental Awareness Program (WEAP) training to all onsite construction personnel to describe species of concern and requirements to protect them under the Endangered Species Act and the Western Riverside Multi-Species Habitat Conservation Plan and mitigation measures being implemented on the project site to conserve the species of concern.
- Monitoring construction activities for the duration of project activities to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat and species:
    - establish environmentally sensitive areas around sensitive biological resources on the project site during the construction phase.
    - ensure that vegetation clearance activities limit disturbance to the smallest practical area and that construction personnel and activities do not enter environmentally sensitive areas.
    - perform daily pre-construction sweeps of work areas prior to initiation of daily construction activities.
    - inspect open trenches, pits, and pipes or other materials within which a covered species or other sensitive species may become entrapped or hide within.
    - Summarize relevant findings in a letter report that will be prepared at the completion of ground disturbing activities.

Aliso Canyon Emergency Monitoring Project Southern California Gas (2023-present). Dana is the lead monitor for a long-term project that includes the removal of sediment from catch basins where sensitive wetlands and wildlife such as coast range newt occurs. Dana is responsible for overseeing the monitoring effort, daily reports, and overall project compliance.

City of LA Recreation and Parks City Park Brush Clearance Monitoring within Riparian Areas (2023). Dana was the primary monitor that conducted nesting bird surveys and compliance monitoring at White Point Park where brush clearance is performed annually to meet LA Fire Department requirements. The work was within and near riparian areas and wetland and riparian vegetation and wildlife were the target species. Also, Dana monitored nesting coastal California gnatcatchers at this site and protected the nest during the project.

City of Los Angeles Biological Resources Assessments (2023 – present). Dana conducts site assessments for biological resources, surveys for special-status plants and animals, maps and characterizes plant communities and wetlands/streams, and assesses potential impacts to biological resources from proposed developments. Dana has worked on the following reports:

- 41 Mar Vista Biological Resources Report in the Santa Monica Mountains Local Coastal Program (LCP)
- 4801 Knob Hill Drive Biologist's Statement of Biological Resources
- 1746 Mandeville SB9 Statement of Habitat
- 2460 Sunset Plaza SB9 Statement of Habitat
- 21050 San Miguel SB9 Statement of Habitat
- 11496 Orum SB9 Statement of Habitat & California Wildlife Habitat Relationship (CWHR) Assessment



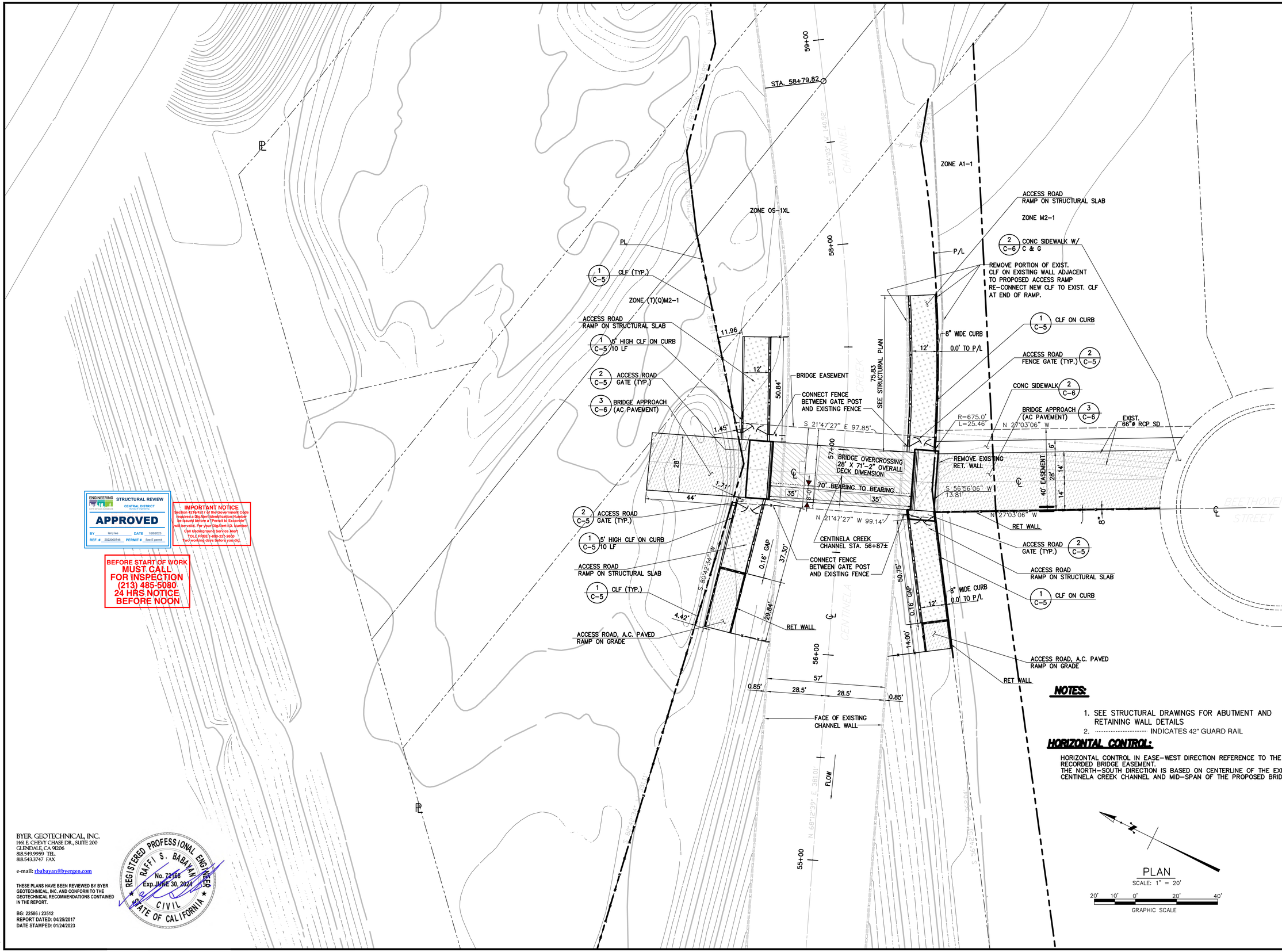
- 230 Carolwood Biologist's Statement of Biological Resources
- 2383 Mandeville Canyon Biologist's Statement of Biological Resources
- 4960 Calvin SB9 Statement of Habitat
- 8152 Ellenbogen SB9 Statement of Habitat
- 10826 Tuxford Statement of Habitat

Dana has also conducted the following monitoring projects:

- Ramona Expressway monitoring biologist
- Glenoaks/ SoCal Edison compliance monitoring
- White Point nesting bird survey and monitoring

Southern California Coastal Water Research Project (2021 – 2022). Dana was a laboratory and field assistant for coastal wetlands project. Dana later was promoted to research technician in the toxicology department where she coordinated and implemented a water toxicology experiment that support southern California wetlands and waters.

Appendix E:
Site Plan



ENGINEERING STRUCTURAL REVIEW
CENTRAL DISTRICT
CITY OF LOS ANGELES
APPROVED
BY larry lee DATE 1/26/2023
REF. # 202200746 PERMIT # See E permit

IMPORTANT NOTICE
Section 4216.4(b)(1) of the Government Code requires a Dig Alert Identification Number be issued before a "Permit to Excavate" will be valid. For your Dig Alert I.D. Number Call Underground Service Alert TOLL FREE 1-800-227-2600 (two working days Before you dig)

BEFORE START OF WORK MUST CALL FOR INSPECTION (213) 485-5080 24 HRS NOTICE BEFORE NOON

BYER GEOTECHNICAL, INC.
1461 E. CHEVY CHASE DR., SUITE 200
GLENDALE, CA 91206
818.549.9959 TEL.
818.543.3747 FAX

e-mail: rbabayan@byergeo.com

THESE PLANS HAVE BEEN REVIEWED BY BYER GEOTECHNICAL, INC. AND CONFORM TO THE GEOTECHNICAL RECOMMENDATIONS CONTAINED IN THE REPORT.

BG: 22586 / 23512
REPORT DATED: 04/25/2017
DATE STAMPED: 01/24/2023

REGISTERED PROFESSIONAL ENGINEER
RAFFI S. BABAYAN
No. 72166
Exp. JUNE 30, 2024
CIVIL
STATE OF CALIFORNIA

NOTES:

1. SEE STRUCTURAL DRAWINGS FOR ABUTMENT AND RETAINING WALL DETAILS
2. ..... INDICATES 42" GUARD RAIL

HORIZONTAL CONTROL:

HORIZONTAL CONTROL IN EASE-WEST DIRECTION REFERENCE TO THE RECORDED BRIDGE EASEMENT. THE NORTH-SOUTH DIRECTION IS BASED ON CENTERLINE OF THE EXISTING CENTINELA CREEK CHANNEL AND MID-SPAN OF THE PROPOSED BRIDGE.

PLAN
SCALE: 1" = 20'

20' 10' 0' 20' 40'
GRAPHIC SCALE

Date AUGUST 18, 2022
Revision No.

kpff
700 South Flower St. Suite 2100
Los Angeles, CA 90017
213.418.0201
www.kpff.com

MARINA ISLAND BRIDGE
5300 BEETHOVEN STREET
Los Angeles, California

SITE PLAN
EARLY START PERMIT

REGISTERED PROFESSIONAL ENGINEER
RICHARD H4 DAVIS
No. C49085
Exp. 3/31/24
CIVIL
STATE OF CALIFORNIA
08/18/2022

Job No.
971309/115417

C-2

NOTES:
JOB # 971309
XREFS: TOPO, CIVIL, 971309TB,

JOB NAME	FILE PATH & NAME	PLOTTED DATE & TIME
971309	971309C2.DWG.DWG	NOV. 05, 1998 5:03:57 PM

UPDATED BY	PLOT SCALE	PROG.MG.	DRAFTER
FK	1=1	IC	FK

EXIST. CHANNEL FENCE

EXIST. CLF ON CONC. BLOCK WALL

2" THICK SHOTCRETE REINF. W/ 6X6-10/10 WWF ON SLOPE FOR EROSION CONTROL

JOIN EXIST. WITH SMOOTH TRANSITION 18.7± FS

JOIN EXIST. 17.5± FS

PROTECT EXISTING CLF

CONC. GUARD RAIL SEE STRUCT. DWG. TYP.

BRIDGE GUARD RAIL SEE BRIDGE MFR. PLAN TYP.

RAMP UP 5% MAX

RAMP DOWN 5% MAX

NEW CONC. CURB

NEW CONC. SIDEWALK

JOIN EXIST 20.01 FS&FL

REMOVE EXIST. RETAINING WALL & CLF

2:1 MAX

SAWCUT & REMOVE EXIST SIDEWALK, AC & C&G

JOIN EXIST.

PLACE AC PAVEMENT AS REQUIRED

NEW SIDEWALK AND C&G AS REQUIRED

20.00 FS

FS 20.14

FS 20.00

AC PVMT

21.34 FS

21.20 FS

REMOVE EXIST CHANNEL FENCE

TOP OF BRIDGE DECK ELEV.=21.20

21.70 TC 21.20 FS

21.00 TC 20.50 FS

21.12 FS

20.02 FS

JOIN SIDEWALK

20.53 FS

20.50 FS

JOIN EXIST.

1% MIN

VAR

LIMIT OF GRADING

JOIN BRIDGE RAILING TO CONCRETE RAILING (TYP.)

TYP.

23.08 TW 22.83 EG 21.20 FS

20.46 FS

22.33 TW 20.02 BW

RET WALL W/ CLF SEE STRUCT. DWGS.

PROTECT EXIST CONC SIDEWALK, AND C & G

2" THICK SHOTCRETE REINF. WITH 6X6-10/10 WWF ON SLOPE FOR EROSION CONTROL

FLOW

JOIN EXIST. 18.3± FS

JOIN EXIST. 18.0± FS

JOIN EXIST. 18.1± FS

JOIN EXIST. 17.9± FS

PL

EXISTING 2-STORY BUILDING

BEETHOVEN STREET

CENTINELA AVENUE

MARINA FREEWAY

STA. 58+79.82

STA. 59+00

STA. 56+00

STA. 55+00

S 57°04'03" W 1052'

N 68°12'39" E 981.01'

S 56°42'51" E 642.04'

NOTES:

1. SEE STRUCTURAL DRAWINGS FOR BRIDGE FOUNDATIONS AND RETAINING WALL.
2. SEE SHT. C-6 FOR PAVEMENT AND SIDEWALK DETAILS

PLAN
SCALE: 1" = 20'

20' 10' 0' 20' 40'
GRAPHIC SCALE

ENGINEERING STRUCTURAL REVIEW CENTRAL DISTRICT
APPROVED
BY _____ larry lee _____ DATE _ 1/26/2023
REF. # 2022000746 PERMIT # _ See E permit _

IMPORTANT NOTICE
Section 4216/4217 of the Government Code requires a DigAlert Identification Number be issued before a "Permit to Excavate" will be valid. For your DigAlert I.D. Number Call Underground Service Alert TOLL FREE 1-800-227-2600 Two working days before you dig.

BEFORE START OF WORK MUST CALL FOR INSPECTION (213) 485-5080 24 HRS NOTICE BEFORE NOON

BYER GEOTECHNICAL, INC.
1461 E. CHEVY CHASE DR., SUITE 200
GLENDALE, CA 91206
818.549.9959 TEL.
818.543.3747 FAX

e-mail: rbabayan@byergeo.com

THESE PLANS HAVE BEEN REVIEWED BY BYER GEOTECHNICAL, INC. AND CONFORM TO THE GEOTECHNICAL RECOMMENDATIONS CONTAINED IN THE REPORT.

BG: 22586 / 23512
REPORT DATED: 04/25/2017
DATE STAMPED: 01/24/2023

REGISTERED PROFESSIONAL ENGINEER RAFFI S. BABAYAN No. 72166 Exp. JUNE 30, 2024 CIVIL STATE OF CALIFORNIA

NOTES:
JOB # 971309
JOB NAME MARINA ISLAND BRIDGE
XREFS: CIVIL_TOPO_971309TB.
FILE PATH & NAME 971309C3.DWG.DWG
PLOTTED DATE & TIME NOV. 05, 1998 5:06:15 PM
UPDATED BY/ PLOT SCALE FK/IC 1=1
PROG.MG. RD/IC
DRAFTER FK

Date AUGUST 18, 2022
Revision No.

kpff
700 South Flower St. Suite 2100
Los Angeles, CA 90017
213.418.0201
www.kpff.com

MARINA ISLAND BRIDGE

5300 BEETHOVEN STREET
Los Angeles, California

GRADING & PAVING PLAN

EARLY START PERMIT

REGISTERED PROFESSIONAL ENGINEER RICHARD HAYES DAVIS No. C48083 Exp. 3/31/24 CIVIL STATE OF CALIFORNIA
08/18/2022

Job No. 971309/115417

C-3

JUNE 29, 2026

FOR July 1, 2026 HEARING at City of Los Angeles/
West LA Area Planning Commission

Appeal of City of Los Angeles Advisory Agency and
Planning Director Decision Case No.: PS-1464
5000 South Beethoven Street (5927, 5298, and 5300 South Beethoven Street)
Palms – Mar Vista – Del Rey [T][Q]M2-1, M2-1, and A1-1 D.M.: 102B157 and 105B157
C.D.11 – Councilwoman Traci Park

CEQA No.: MND-97-348-ZC-GPA-HD-SPR and ENV-2023-6735-MND-REC1

Re: Legal Description: Arbs 1 and 2, Lot FR 1, Tract TR 1100; Arbs 301 and 432, Lot FR Jacinto Talamantes 17 Acres, Tract Rancho La Ballona; Lot FR Jesus Talamantes 17 Acres, Rancho La Ballona; Arb 4, Lot None, Tract Record of Survey; Arb 101, Lot FR Jesus Talamantes 17 Acres, Tract Rancho La Ballona; and Lot A, Tract P M 2260

Re: BIRD ISLAND – also known as 5000 Beethoven - Approval of a Tentative Tract Map, approval of a CEQA Addendum, Approval of a private street being converted to a public street

Item #6 on the agenda

Dear Commissioners:

We dispute several details in the staff report, and we ask that you uphold our appeal.

The Mitigated Negative Declaration (MND) being relied on was published and circulated in 1997 and approved in 1998. This MND is for a project that is a light industrial, light manufacturing.

Given the information in the record, including what we outline in this letter, we believe a Subsequent MND or an EIR is required for this project. While under CEQA

Guidelines Section 15162, a lead agency only needs to prepare a **Subsequent MND** or **Subsequent EIR if**:

substantial changes occur in the project,
circumstances change, or
new information is discovered that leads to new or substantially more severe environmental impacts – **substantive circumstances have changed since 1998**.

Staff notes that: "The MND itself had already analyzed potential cumulative impacts and found that there were none." However, cumulative impacts could not have been analyzed in 1998 for the area surrounding this property because the changed circumstances enumerated below had not yet happened.

CIRCUMSTANCES HAVE CHANGED:

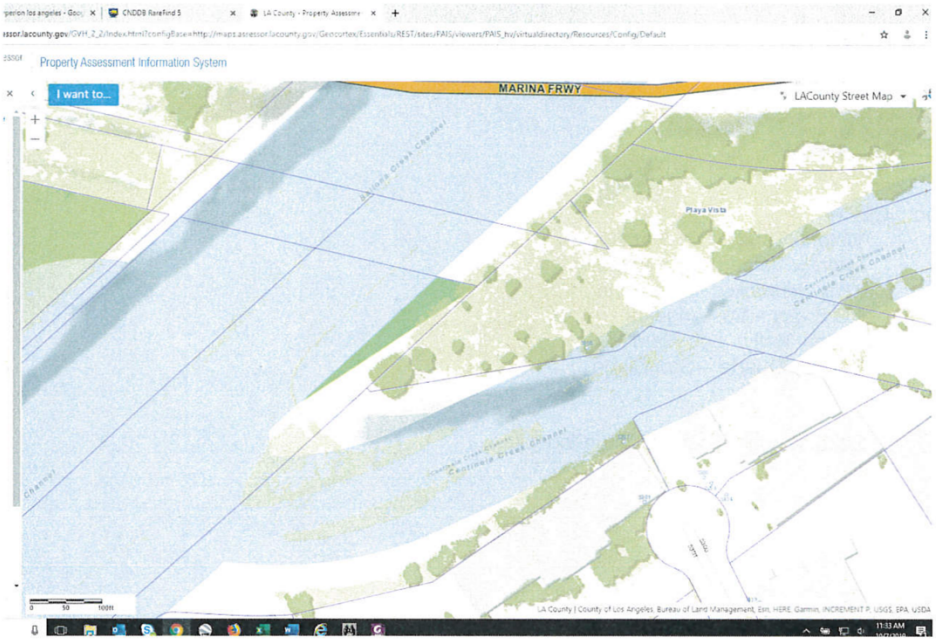
A. For example, not one building had been constructed from either Phase 1 or Phase 2 of Playa Vista in 1998. Today, only a few blocks away, this 460-acre planned development consists of:
* **Population:** Roughly 14,000 to 16,000 residents.
* **Commercial Hubs:** Features approximately 3 million square feet of creative offices (often known as the "Silicon Beach" tech hub), anchored by "The Campus at Playa Vista".
* **Retail & Dining:** Includes over 200,000 square feet of retail, much of it centered around the Runway Playa Vista shopping and lifestyle center.

It can hardly be argued that this development does not equate to serious and substantive changed circumstances, particularly related to cumulative traffic impacts. Numerous impacts to the area have been made by this development at Playa Vista and other surrounding developments in the nearly 30 years since the MND for a "light industrial" commercial site.

B. A significant and growing private school, Westside Neighborhood School, exists within walking distance from the private driveway, the developer team wants to turn into a public road. That private driveway is accessed from Beethoven, which is less than ½ block from the driveway. School children cross the now relatively quiet Beethoven Street throughout each day. The safety impacts from increased traffic from this bridge being used need to be studied – with public input and input from various agencies.

C. The Ballona Wetlands Ecological Reserve does abut directly to the Bird Island (5000 Beethoven) property (the 2019 CA Dept of Fish & Wildlife letter in the

record confirms this), unlike what staff (per the applicant!) has represented (City Planning staff claims it is 2,500 ft. away.) The State CA Dept of Fish & Wildlife (CFDW) property boundary ends on the east along Ballona Creek at the 90 Marina Freeway bridge. Ballona Creek itself in this area is part of the Ballona Wetlands Ecological Reserve. Additional new information is illuminated in the 2019 letter wherein Ms. Erinn Wilson states that some of their land appears to overlap with the project site – and she included a County Assessor map showing those boundaries that the developers of this project site may not be aware of, although they should have been in 2019 when the letter was originally sent to them.



Attachment 1: An image of parcel boundaries taken from the Los Angeles County Office of the Assessor website: www.maps.assessor.lacounty.gov

In response to staff response 2a – intrusions ought to have been obvious to the CA Department of Fish & Wildlife (CDFW) and to City Planning Staff, although we are aware that personnel changes at CDFW might have caused this information falling through the cracks. On previous tours of the areas, CDFW personnel were made aware that part of the location where the streams or creeks come together hosts an important Knotgrass area where shorebirds and waterfowl nest and roost. Additional impacts were mentioned in Ms. Wilson's 2019 letter.

This area is directly below the upper area known as Bird Island – AKA 5000 Beethoven, and these birds would be impacted by noise from construction, as well as air quality impacts and vibrations from construction activities. Such impacts were noticed by Environmental Scientist & Wildlife Biologist Robert van de Hoek on a site visit when the developers' representative invited stakeholders to the site for review of the developers' plans – the noise from the meeting of a dozen people or so obviously impacted the birds in the habitat below.





Black-necked Stilt and American Wigeon nest and roost here. Other species of shorebirds, waterfowl, wading birds and gulls also use these riverine habitats.



As is evident in this photo, the 5000 Beethoven site is bordered by waterways on the major sides of it. Only the side to the east is bordered by development (the 90 fwy, which is behind the trees.).
note: this photo was taken after many trees and shrubs/native vegetation were removed.



Birds in Ballona Creek, Knotgrass at Confluence of Ballona and Centinela Creeks and the Bird Island site (AKA 5000 Beethoven) before the developers chopped down all of the bushes and many of the trees (including a regular roost for the American Osprey.) ***J.Coffin photo***



This is how the violation of CDFW law happened – lots of
Loose debris when the bridge pilings were being installed.

NEW INFORMATION:

The applicant and City Planning Staff argue that there is no new information, and yet, they cite numerous additional documents - including:

E2 – Addendum No. ENV-2023-6735-MND-REC1 dated June 2026
E3 – Air Quality Study dated May 2025
E4 – Biological Resources Report dated July 2025
E5 – Noise Study dated May 2025

An example of why a full EIR or at least a subsequent MND is needed is the July 2025 Biological Resources Report listed above – the study area marked in red on page 78 of the "additional information" provided to us by City Planning staff last week does not even include the area at the confluence of the two streams/creeks where the Knotgrass grows and where numerous Waterfowl and Shorebirds nest and rest. Likewise, the study area marked on page 84 mostly includes paved and developed areas to the south of the site, and does not include the areas of the confluence – so, no wonder the flora and wildlife discussions and conclusions are lacking and inaccurate.

Also cited are ***new correspondence with new information*** included from various City of LA Departments and Bureaus:

F1 – Bureau of Engineering Letter dated July 11, 2023
F2 – Bureau of Street Lighting Letter dated April 17, 2023
F3 – Department of Building & Safety Zoning Section Letter dated 4.18.23
F4 – Department of Transportation Letter dated June 3, 2026
F5 – Department of Water and Power Letter dated August 14, 2023
F6 – Fire Department Letter dated April 25, 2023
F7 – Recreation and Parks Letter dated April 25, 2023
F8 – Sanitation & Environment Letter dated November 19, 2025

Also cited are ***new correspondence with new information*** included from several County, State and Federal government entities:

G – Los Angeles County Flood Control District Permit No. FCDP2017006112
H – U.S. Army Corps of Engineer Permission No. SPL-408-2016-015
I – California Department of Fish and Wildlife Lake or Streambed Alteration Notification Review No. EPIMS-LAN-46551-R5

And yet, there is nothing from LA County Public Works Department allowing vehicles from the public using the property to traverse along what are now maintenance roads, the only roads directly accessing the Bird Island site.

ADDITIONAL NEW INFORMATION

Additional new information can be found on a Zillow listing that backs up what community stakeholders know some of since we've attended numerous meetings where the real plans for development of this site have been revealed. While City Planning Staff have informed us they do not know of other plans, the

developer/investment representatives have prepared and presented plans for a significant mixed-use development.

Bait & Switch

From website information on a Zillow listing, combined with numerous presentations to the community, including on-site invitations to community stakeholders and specific presentations of a Draft Environmental Impact Report (EIR) to the Del Rey Neighborhood Council, it is clear that what is being represented to the City Planning Commission is a classic bait & switch.

From the website (see information in red, which indicates the owner does not want entitlements as approved in 1998, but much, much more – including high density development, mixed use residential and subterranean parking, a sports center, etc. with an $80 million sale price):

> 5000 Beethoven presents a rare opportunity to acquire a large, infill development site in the Palms-Mar Vista-Del Rey sub-market of Los Angeles. The property consists of approximately 146,422 square feet (3.36 acres) of land situated immediately adjacent to the Marina Freeway (SR-90), with direct access via Beethoven St. and a recently improved bridge connection. The site's configuration, freeway adjacency, and separation from low-density residential uses make it particularly well suited for higher intensity development and specialized uses. The property is currently zoned [T][Q]M2-1 (Light Industrial) and is designated Light-Industrial under the City of Los Angeles General Plan. While residential uses are not permitted by-right, the site benefits from several important planning overlays, including the Los Angeles Coastal Transportation Corridor Specific Plan and Community Transit Access Corridor (CTAC) eligibility. These designations support intensified land uses and have historically facilitated industrial-to-residential conversions, particularly for affordable and mixed-income housing. No minimum density requirement applies. A significant value driver is the seller's representation that the City has previously reviewed and accepted a concept for two levels of subterranean parking accommodating approximately 250 - 300 parking spaces, subject to verification. Prior City acceptance of subterranean parking materially de-risks one of the most challenging components of high-density development and enhances the feasibility of future residential or phased redevelopment strategies. In addition to residential potential, the property offers an attractive alternative or interim-use strategy for athletic, sports performance, or wellness-

oriented facilities, which are generally compatible with industrial zoning and benefit from freeway adjacency and controlled access. **Conceptual studies demonstrate the site's ability to support a modern, unbranded basketball or multi-sport performance campus while preserving long-term redevelopment optionality**. With its scale, policy support, freeway exposure, and demonstrated parking feasibility, **5000 Beethoven offers investors and developers a flexible platform for high density affordable or mixed-income housing, specialized athletic facilities, or strategic land banking with near-term income potential.** The property represents a unique opportunity to control a large, well-located West-Side parcel with multiple viable paths to value creation, subject to final entitlements and buyer due diligence.

https://www.zillow.com/homedetails/5000-S-Beethoven-Los-Angeles-CA-90066/461253982_zpid/

In the CA Dept of Fish & Wildlife letter to the applicants dated Sept 24 2024, the department references the "Residential Project" – "CDFW Comments on Del Rey Pointe Residential Project MND) – which they state does require a Streambed Alteration Agreement. Additionally, Notice of Violations were issued for the bridge building work that was started in violation of the law. Noted that this letter also states: "if you do not complete your project before the term in your notification has expired at the end of this year, you will need to re-notify CDFW before you may continue your project." There do not appear to be additional notifications to CDFW related to this proposed project.

Within the CDFW letter of 2019, it states that the project is a multi-family residential project consisting of 236 residential apartment units, a total of 406 parking spaces (including subterranean and semi-subterranean parking).

As for the bridge itself, CDFW expressed in a 2024 email message serious concerns about the effect of shading of Centinela Creek that would occur when the bridge was installed. They also instructed the developers to "stop placing deleterious materials within 150 ft of the watercourse" – as they observed "debris and loose materials at the site."



Figure 1. The bridge being constructed over Centinela Creek at 5000 Beethoven Street, Los Angeles CA. These photos were taken on December 7, 2023 by Warden Gilbert.

ADDITIONAL NEW INFORMATION

Additional new information is revealed in the City Planning Staff's report – that this site in a Methane Zone and a Liquefaction Zone – two designations that were not in existence in 1997, when the MND for this site was published – as they became important designations with the entitlement approval and financing hearings the City undertook for the Playa Vista development. (methane mitigations, for example, were developed in 2001 - https://cityclerk.lacity.org/onlinedocs/2006/06-2922-s1_rpt_lafd_10-25-07.pdf)

PIECEMEALING, MISREPRESENTATION & IMPROPER SEGMENTING

Planning staff stated the law quite clearly, and we believe there have been violations of the law related to this topic. The developers know that this project is opposed by the Del Rey Neighborhood Council, Ballona Creek Renaissance, LA Waterkeeper, Defend Ballona Wetlands and the Del Rey Residents Association.

And so they are working to get one permit here, and another permit there – all to show investors they are moving forward, without subjecting their plans to a thorough environmental review that might go down in defeat. This is clear to everyone in the community who has been watching and commenting on this project for years. Here's the law, which is in the staff report. We hope you will take action.

"Any action taken to avoid environmental review of the project, including through the misrepresentation of the whole of the project in any City application, may result in a violation of Section 13B.11.1.I.1 and 13B.11.1.H.5. of Chapter 1A of the LAMC and the listed penalties.

Improper segmentation of a project may be shown through any evidence obtained by the City that an applicant intentionally elected to not disclose all components of a proposed project, including not but limited to other applications or entitlement requests from the City."

Thank you for your consideration of our appeal. We ask that you grant the appeal and require a full and Subsequent MND or a full EIR – given the age of the last review and the addition of so much new information available now.

With best regards ~

Marcia Hanscom
Community Organizer
& Legal Coordinator

Robert J. van de Hoek
Environmental Scientist & Wildlife Biologist

Cc: Jamie Hall, Channel Law Group

DAY OF HEARING SUBMISSIONS

DWarren response to staff report - *West LA Area Planning Commission July 1, 2026*
Case No.: DIR-2024-1588-CDP-1A
CEQA No.: ENV-2024-1589-CE

JUNE 29, 2026

FOR July 1, 2026 HEARING at City of Los Angeles/ West LA Area Planning Commission

Appeal of City of Los Angeles Advisory Agency and
Planning Director Decision Case No.: DIR-2024-1588-CDP-1A
CEQA No.: ENV-2024-1589-CE
PROJECT LOCATION: 13374 West Jefferson Boulevard
Specific Plan: Playa Vista (Area B); Certified NC: Westchester/Playa
GPLU: Open Space. Zone: OS(PV), A2(PV) C.D.11 – Councilwoman Traci Park

PROPOSED PROJECT: The plugging and abandonment of the natural gas well Vidor 15 (API: 0403714071) at the Playa Del Rey Natural Gas Storage Facility, located within an upland area of the Ballona Wetlands Ecological Reserve. Work would include use of a workover rig to remove piping and the wellhead, setting cement plugs, cutting the top portion of the well casing, sealing the well, and including identifying information. Mechanical Integrity Testing (MIT) may also be required depending on guidance from CalGEM.

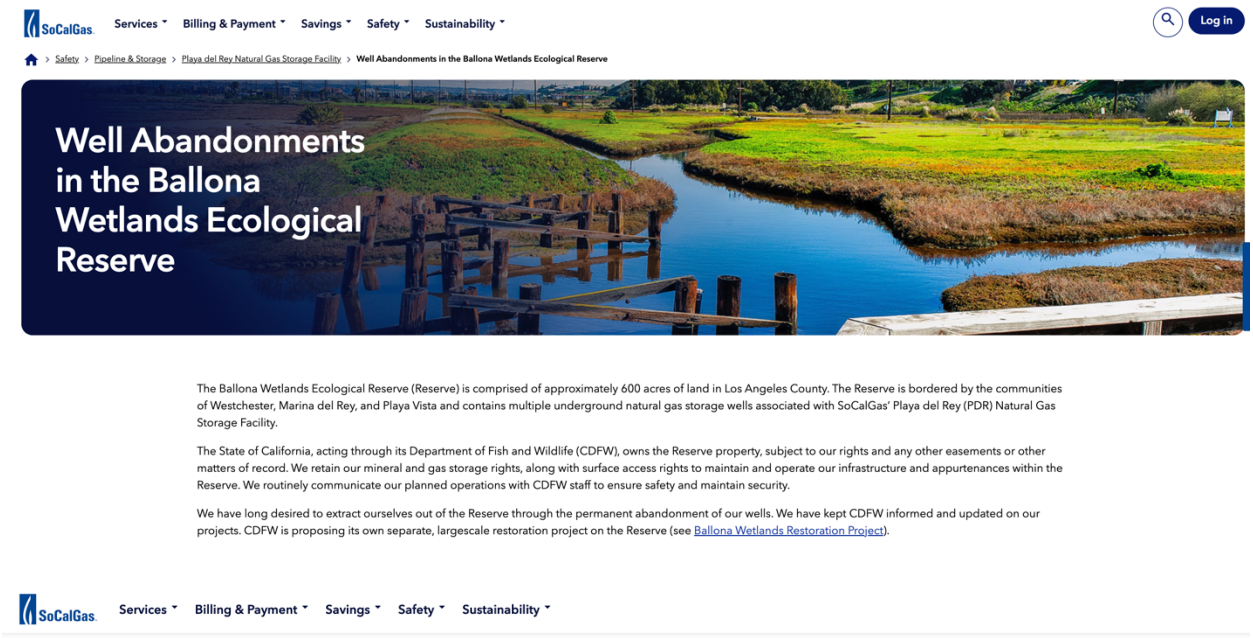
REQUESTED ACTION: An appeal of the Director of Planning's determination, dated October 24, 2025, to approve a Coastal Development Permit pursuant to Los Angeles Municipal Code (LAMC) Section 13B.9.1 of Chapter 1A, and a Categorical Exemption pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15301, Class 1.

Dear Commissioners:

We ask that you grant our appeal and require that SoCalGas prepare a full Environmental Impact Report (EIR) for all of the remaining wells they intend to either abandon or "move" – as the plan they have articulated in numerous locations is to upgrade their crumbling infrastructure and construct slant drilling apparatus against the Playa del Rey bluffs. These bluffs, made of ancient sand dunes from the flowing of the Los Angeles River over many thousands of years, are cascading downward on a regular

basis, as sand dunes sometimes do. For this reason alone, especially given concerns for the safety of those residents who live at the top of those bluffs, a full environmental review is not only prudent, but required by law.

These are the wells that SoCalGas has published on its website are still to be abandoned and/or moved ("moved" is the word used in the Ballona Wetlands EIR that was released in 2017 and decertified after Court action in 2023 because incorrect flood risk standards were used by the consultants and relied on by the State of California):



This is where you can find this website: https://www.socalgas.com/safety/pipeline-and-storage/playa-del-rey-storage-facility/ballona-wetlands-ecological-reserve

From: David Warren, long-time Ballona Wetlands advocate

#5









FILE COPY

Complying Submission

RECEIVED
CITY OF LOS ANGELES

JUL 01 2026

CITY PLANNING DEPT.
AREA PLANNING COMMISSION




PROPOSITION 65
NOTICE
THIS AREA CONTAINS SUBSTANCES
KNOWN TO THE STATE OF CALIFORNIA
TO CAUSE CANCER, INCLUDING BUT
NOT LIMITED TO TOBACCO SMOKE

Crotch's Bumblebee – *Bombus Crotchii – photos by Jonathan Coffin.* These photos were taken near the gas road to the SoCalGas Tank Farm. Vidor 15 is located near where this pollination activity takes place on an ongoing basis.





Belding's Savannah Sparrow - *Passerculus sandwichensis beldingi*

(both of these photos below were taken in Area B South – which is the area where the Vidor 15 well is located) photos by Jonathan Coffin. There is documentation in reports completed by wildlife biologists monitoring this species, as well.





As well, I have become an avid wildlife watcher, and, as she knows the habitat this bird uses, as well as its distinctive behavior in the habitat, she reported that she observed Belding's Savannah Sparrow (BSS) in the Pickleweed habitat very close to the Vidor 15 well site on Sat, 6.27.26.

This is a photo of where I observed the BSS flying about and then appearing to fly/jump down into the Pickleweed.



Finally, there is obvious ESHA – assemblages of numerous wetlands plant populations on both sides of the road where Vidor 15 sits. A full environmental review is necessary so that – if this project is approved, it is approved with the requirement under the Coastal Act, per the Bolsa Chica Appeals Court decision, this ESHA is not disturbed nor moved, which it is not allowed to be.



When considering all of the well work – abandoning and moving – that SoCalGas intends to so, it is incumbent on decision-makers to require full environmental review – especially on a site where such rare and fragile wetlands are involved.

Thank you for your consideration of our ask that you comply fully with the law and with the moral obligations we must take in this biodiversity hotspot of Los Angeles, where every measure possible must be taken to make sure these threatened species are protected.

Sincerely,
Marcia Hanscom /s/
Defend Ballona Wetlands
(310) 877-2634

R van de Hoek – response to staff report - *West LA Area Planning Commission July 1, 2026*
Case No.: DIR-2024-1588-CDP-1A
CEQA No.: ENV-2024-1589-CE

The Playa del Rey fossil gas storage facility was originally meant to be an experiment to store gas for thousands of new homes being constructed as military families moved to the Los Angeles area after World War II. The experimental nature of this facility has outlived its initial purpose, and now we know that this is a dangerous and toxic facility, similar to the fossil gas storage operation at Aliso Canyon, where one of the most tragic energy explosions (some call it a "leak" – but it was much more than that) went on for months!

> "Local residents have reported headaches, nausea, skin rashes, and severe nosebleeds.[4] About 50 children per day saw school nurses for severe nosebleeds.[42] There have been more than usual eye, ear and throat infections.[31] By December 25, 2015, more than 2,200 families from the Porter Ranch neighborhood had been temporarily relocated, and more than 2,500 households were still being processed.[47] As of January 7, 2016, 2,824 households or about 11,300 people had been temporarily relocated by SoCal Gas,[41] while more than 6,500 families have filed for help.[50] Two schools were relocated in January.[18]"
>
> https://en.wikipedia.org/wiki/Aliso_Canyon_gas_leak

As a result of what was learned through this tragedy that STILL causes pain and suffering for the community near Aliso Canyon (and also for firefighters and other first responders – 55 firefighters sued over serious health impacts - https://www.dailynews.com/2019/08/20/list-of-la-firefighters-suing-socalgas-over-2015-aliso-canyon-gas-leak-grows/), these entities have called for the closure and ceasing of injections of fossil gas at the Playa del Rey gas storage facility (***not*** the upgrading of its infrastructure):

- Los Angeles County Board of Supervisors
- Culver City Council
- City of Santa Monica
- Los Angeles City Council

https://www.latimes.com/business/story/2021-04-07/aliso-canyon-natural-gas-playa-del-rey

Additionally, in a report to the State Legislature, the California Council on Science & Technology (CCST) has concluded that the Playa del Rey facility, which injects into the ground under very high pressure fossil gas that has been transported via pipeline from fracked gas facilities in Oklahoma, Texas, Colorado and Utah, is one of the most dangerous in the state and should be considered for shutting down.

https://ccst.us/reports/long-term-viability-of-underground-natural-gas-storage-in-california-an-independent-review-of-scientific-and-technical-information/

All of these facts described above call out for a full environmental review for any movement of these wells on site, including Vidor 15, which is the subject of this appeal you are hearing today.

Additionally, this well – Vidor 15 – which sits along the road to the SoCalGas Tank Farm – is directly in the middle of very fragile and important coastal wetlands ESHA (Environmentally Sensitive Habitat Area) as defined by the California Coastal Commission and the California Coastal Act.

The most independent and knowledgeable scientist in the region for several decades is a signatory of this letter – Robert J. van de Hoek – and he states the following:

If this well is removed, then it must be considered to simply close up the gas mechanisms without removing the concrete infrastructure and stairway – which, once the gas and chemicals are no longer present, can easily be a wildlife refuge for several species of bats. Our support for more Bat habitat is important at Ballona because Bats eat Mosquitoes, which are an important component of the ecosystem where marsh habitat exists, but are not always welcome to human habitats nearby. This alternative for deconstructing the well site must be studied as an alternative in a full environmental review, and also under the requirements in the coastal zone to consider least damaging feasible alternatives.

> "When combining CEQA with the California Coastal Act (.gov), the standard becomes much stricter, requiring the project to be the **"Least Environmentally Damaging Feasible Alternative" (LEDFA)**. [1, 2, 3]
> https://documents.coastal.ca.gov/reports/1998/11/Th4a-11-1998.pdf

Additionally, there have been observations and documentation of at least two species on the California Endangered Species List – using habitat in very close proximity to this well site, and while not directly ON the well site, the close proximity requires a full environmental review and consideration of possible mitigations so that the massive use of heavy equipment and noise that occurs along with the well removals that we have observed at the earlier well construction work which are outlined in the staff report and application, do not harm these species.

From: Robert van de Hoek, Environmental Scientist and Wildlife Biologist

#6

FILE COPY

RECEIVED
CITY OF LOS ANGELES
JUL 01 2026
CITY PLANNING DEPT.
AREA PLANNING COMMISSION

FOR July 1, 2026 HEARING

City of Los Angeles/ West LA Area Planning Commission

Appeal of City of Los Angeles Advisory Agency and Planning Director
Decision Case No.: PS-1464 5000 South Beethoven Street (5927, 5298, and 5300 South Beethoven Street)
Palms – Mar Vista – Del Rey [T][Q]M2-1, M2-1, and A1-1 D.M.: 102B157 and 105B157
C.D.11 – Councilwoman Traci Park

CEQA No.: MND-97-348-ZC-GPA-HD-SPR and ENV-2023-6735-MND-REC1

Re: Legal Description: Arbs 1 and 2, Lot FR 1, Tract TR 1100; Arbs 301 and 432, Lot FR Jacinto Talamantes 17 Acres, Tract Rancho La Ballona; Lot FR Jesus Talamantes 17 Acres, Rancho La Ballona; Arb 4, Lot None, Tract Record of Survey; Arb 101, Lot FR Jesus Talamantes 17 Acres, Tract Rancho La Ballona; and Lot A, Tract P M 2260

Re: BIRD ISLAND – also known as 5000 Beethoven - Approval of a Tentative Tract Map, approval of a CEQA Addendum, Approval of a private street being converted to a public street

Item #6 on the agenda

There are other plans to develop the site as residential/mixed-use.
These plans appear to be a significant change, and would be subject to a new case and environmental review. Thus, I ask that you uphold the appeal.

Dear Commissioners:

City admits that it "is not aware of any other plans to develop the project site." I hope that this Hearing will inform City of the other plans. They present significant changes from the two-story industrial building that was approved under Case Nos. CPC-1997-407-ZC-GPA and CPC-1997-416-HD (Exhibit C) and Ordinance No. 172,217 and its "Q" Qualified Classification Conditions (Exhibit D)." These changed plans require additional entitlements and would be subject to filing of a new case and environmental review.

At this hearing City will be presented with Information regarding the residential/mixed use project of which City admits it was unaware:

- Applicant approached two neighborhood groups from the Del Rey area close to the project site and has given presentations of what the residential/mixed use project would be.

- Applicant has made on-site invitations to community stakeholders. Some of these people will present testimony at the Hearing.

- Applicant has made specific presentations of a Draft Environmental Impact Report (EIR) to the Del Rey Neighborhood Council regarding the residential/mixed use project.

- Applicant's ZILLOW listing makes clear that he wants much more than was approved in 1998: high density development, mixed use residential, a sports center, etc. See Zillow listing https://www.zillow.com/homedetails/5000-S-Beethoven-Los-Angeles-CA-90066/461253982_zpid/

- California Department of Fish and Wildlife Lake or Streambed Alteration Notification Review No. EPIMS-LAN-46551-R5 – dated September 24, 2024. This letter references the "Residential Project" --- "CDFW Comments on Del Rey Pointe Residential Project MND. This letter is included in City's own files. Because City had the evidence of the residential/mixed use project in its files, how could the City now say it was unaware of it?

Based on the evidence submitted that Applicant plans to significantly change the approved industrial project, evidence including but not limited to evidence in City's own files; testimony at the hearing; and other submissions supporting this Appeal, this Appeal must be upheld. Under City's regulations, Applicant must submit plans for the significantly changed project and undergo a new environmental review.

Respectfully submitted,
Susanne L. Cumming, Esq.
July 1, 2026

Planning APC West LA <apcwestla@lacity.org>

Public Comment, Case No. PS-1464-1A (Agenda Item No. 6)

1 message

Justine <jblockesq@gmail.com> Wed, Jul 1, 2026 at 4:09 PM
To: "apcwestla@lacity.org" <apcwestla@lacity.org>

Dear Commissioners,

I urge your reconsideration of the subject Project approval, due to inadequacies of the environmental review required under the *California Environmental Quality Act (CEQA) and CEQA Guidelines*, as discussed in the appeal filed by the Appellant, Defend Ballona Wetlands.

The Project Biological Resources Report discusses the following: “A disturbed/non-native grassland occurs on 2.01-acres on the northern region of study area and on 0.02 acres of the project site that was impacted by the bridge development footprint.”

Given this environmental impact of prior bridge development related to the Project, perhaps you may mandate further Project conditions that require the Applicant to restore native grasslands and other native habitat in the study area, or similar types of measures.

Thank you for your consideration of my comments.

Kind regards,

Justine Block, J.D.

Planning APC West LA <apcwestla@lacity.org>

PS-1464-1A at 5000, 5927, 5298 and 5300 South Beethoven Street

1 message

K Pulungan <kpulungan@gmail.com> Wed, Jul 1, 2026 at 2:16 AM
To: apcwestla@lacity.org, "kenton.trinh@lacity.org" <kenton.trinh@lacity.org>

Hello,

I am writing to provide feedback on this proposed development at 5000 South Beethoven Street. This bridge should be open to the public, and another bridge should be built, possibly using the old bridge piers, across Ballona Creek to reach the Ballona Bike Path. There is precedent for using old bridge piers for bike bridges, such as the Red Car Pedestrian Bridge in Atwater Village in Los Angeles. It will also make such a development friendlier to the environment by reducing car traffic. There is currently *no* safe way to bike across the Ballona or Centinela Creeks near Playa Vista, and this would solve a glaring gap in the clean transportation network.



The current bridge in red, Ballona Creek bridge in green.

Thank you,

Kemal

Planning APC West LA <apcwestla@lacity.org>

Public Comment PS-1464-1A

1 message

Rashel Mereness <rashelski@gmail.com> Wed, Jul 1, 2026 at 9:17 AM
To: apcwestla@lacity.org

Hello, I'm not sure if this is the accurate way to provide this comment. If you have time, please let me know. If this is correct, then please add the below to the Public Comment discussion for the July 1 meeting on PS -1464-1A (re 5000 Beethoven)

Good afternoon, Commissioners.

I respectfully ask that you deny this project, or at a minimum require a current environmental review before approving permanent access to this site.

First, while I understand the City is relying on an environmental review prepared in 1998, Los Angeles is not the same city it was nearly thirty years ago. The surrounding area has changed dramatically, environmental priorities have evolved, and our understanding of habitat preservation has grown. A project with permanent consequences like this should be evaluated based on today's conditions—not assumptions made in the last century.

Second, this property lies in an ecologically important area near Centinela Creek and the Ballona Wetlands. Open space like this is becoming increasingly rare in Los Angeles and should be preserved whenever possible. To the extent there is a need or desire for additional housing in this area, the City should first look to the many underutilized and vacant commercial and industrial buildings nearby that could be repurposed before approving new development on environmentally sensitive land.

Finally, I am concerned that creating permanent road access to this isolated site could create additional public safety and management challenges, including making the property more susceptible to unauthorized activity and encampments. Before taking that irreversible step, the City should conduct a current environmental review that reflects today's conditions rather than relying on a nearly 30-year-old document.

For these reasons, I respectfully urge you to deny this application or require updated environmental review before approving permanent access to this unique property.

Thank you for your consideration.