HOW TO VIEW THE MEETING: No physical location from which members of the public may observe the meeting and offer public comment will be provided.

HOW TO PARTICIPATE BEFORE THE MEETING: Members of the public are encouraged to submit email correspondence to gduncan@malibucity.org before the meeting begins.

HOW TO PARTICIPATE DURING THE MEETING: Members of the public may also speak during the meeting through the Zoom application by clicking the Raise Hand link at the bottom of the Zoom screen when the Chair calls the item. You must be present in the Zoom conference to be recognized.

Please visit https://malibucity.org/VirtualMeeting and follow the directions for downloading and using the Zoom application.

Malibu Environmental Review Board
Meeting Agenda

Wednesday, July 22, 2026

9:00 A.M. – ENVIRONMENTAL REVIEW BOARD MEETING
VIA TELECONFERENCE ONLY

Zoom Meeting Link:
https://us02web.zoom.us/j/85719338220

1. Written and Oral Communications from Staff and the Board

None.

2. Old Business

None.

3. New Business

A. Coastal Development Permit No. 26-032, Conditional Use Permit 26-005, and Variance No. 26-008 – A follow-up application to Emergency Coastal Development Permit No. 25-017 for a temporary public utility laydown yard to store materials and vehicles; including a variance for development on slopes steeper than 2.5 to 1

Application Filing Date:	May 1, 2026
Project Applicant:	Los Angeles Department of Water and Power (LADWP)
Property Owner:	LADWP
Location:	4000 Corral Canyon Road, partially within the appealable coastal zone

APN:	4459-006-270
Zoning:	Rural Residential, Twenty-Acre
Case Planner:	Associate Planner Elias, 456-2489, ext. 256 selias@malibucity.org

Recommended Action: Review the proposed project and provide recommendations for the Planning Commission's consideration.

Adjournment

Guide to the Meeting Proceedings

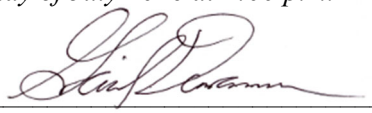
The Environmental Review Board meeting will be open and public but conducted virtually because the Board is not a Brown Act body.

Old Business items have appeared on previous agendas but have either been continued or tabled to this meeting with no final action having been taken. Applicants will be given 15 minutes to present their position to the Board. Members of the public wishing to speak will be limited to three (3) minutes. Members of the public wishing to speak during the meeting must participate through the Zoom application and click the raise hand button at the bottom of the Zoom screen when the item has been called by the Chair.

Items in New Business are items which are appearing for the first time for formal action. Applicants will be given 15 minutes to present their position to the Board. Members of the public wishing to speak will be limited to three (3) minutes. Members of the public wishing to speak during the meeting must participate through the Zoom application by clicking the Raise Hand link at the bottom of the screen when the Chair calls the item. Visit https://malibucity.org/VirtualMeeting and link to Zoom Video Tutorials prior to the meeting if you are a first-time user.

Copies of the staff reports or other written documentation relating to each item of business described above are available at https://www.malibucity.org/agendacenter. Requests to show an audio or video presentation during a Board meeting should be directed to gduncan@malibucity.org. Material must be submitted by ***12:00 p.m. on the day prior to the meeting****.*

I hereby certify under penalty of perjury, under the laws of the State of California that the foregoing agenda was posted in accordance with the applicable legal requirements. Regular and Adjourned Regular meeting agendas may be amended up to 72 hours in advance of the meeting. Dated this 16th day of July 2026 at 2:00 p.m.



Gail Duncan, Management Analyst

Environmental Review Board
Agenda Report

ERB Meeting
07-22-26
Item 3.A.

To: Members of the Environmental Review Board

Prepared by: Samantha Elias, Associate Planner

Reviewed by: Tyler Eaton, Assistant Community Development Director

Approved by: Courtney McCammon, City Biologist

Date prepared: July 16, 2026 Meeting date: July 22, 2026

Subject: Coastal Development Permit No. 26-032, Conditional Use Permit 26-005, and Variance No. 26-008 – A follow-up application to Emergency Coastal Development Permit No. 25-017 for a temporary public utility laydown yard to store materials and vehicles; including a variance for development on slopes steeper than 2.5 to 1

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Property Owner:	LADWP
Location:	4000 Corral Canyon Road, partially within the appealable coastal zone
APN:	4459-006-270
Zoning:	Rural Residential, Twenty-Acre (RR-20)

RECOMMENDED ACTION: Review the proposed project and provide recommendations for the Planning Commission's consideration.

DISCUSSION: The parcel has mapped Environmentally Sensitive Habitat Area (ESHA) as shown on the Local Coastal Program ESHA and Marine Resources Map. Pursuant to LIP Section 4.3, a site-specific biological assessment was submitted under the project's original Emergency Coastal Development Permit (ECDP) review. The findings concluded that the project area and the area within 100 feet of the project vicinity were not ESHA. The project requires review by the Environmental Review Board (ERB) under Local Coastal Program (LCP) Local Implementation Plan

(LIP) Section 4.4.4. because of the potential impact to sensitive biological resources inside the ESHA buffer.

For this item, the ERB will assess how the project has the potential to impact biological resources. The ERB may provide recommendations on the conformance or lack of conformance of the proposed project, individually and cumulatively, with the policies of the certified Malibu LCP, and may suggest mitigation measures designed to avoid or minimize impacts on ESHA resources. The Planning Commission will consider the ERB's recommendations when making findings required by the LIP.

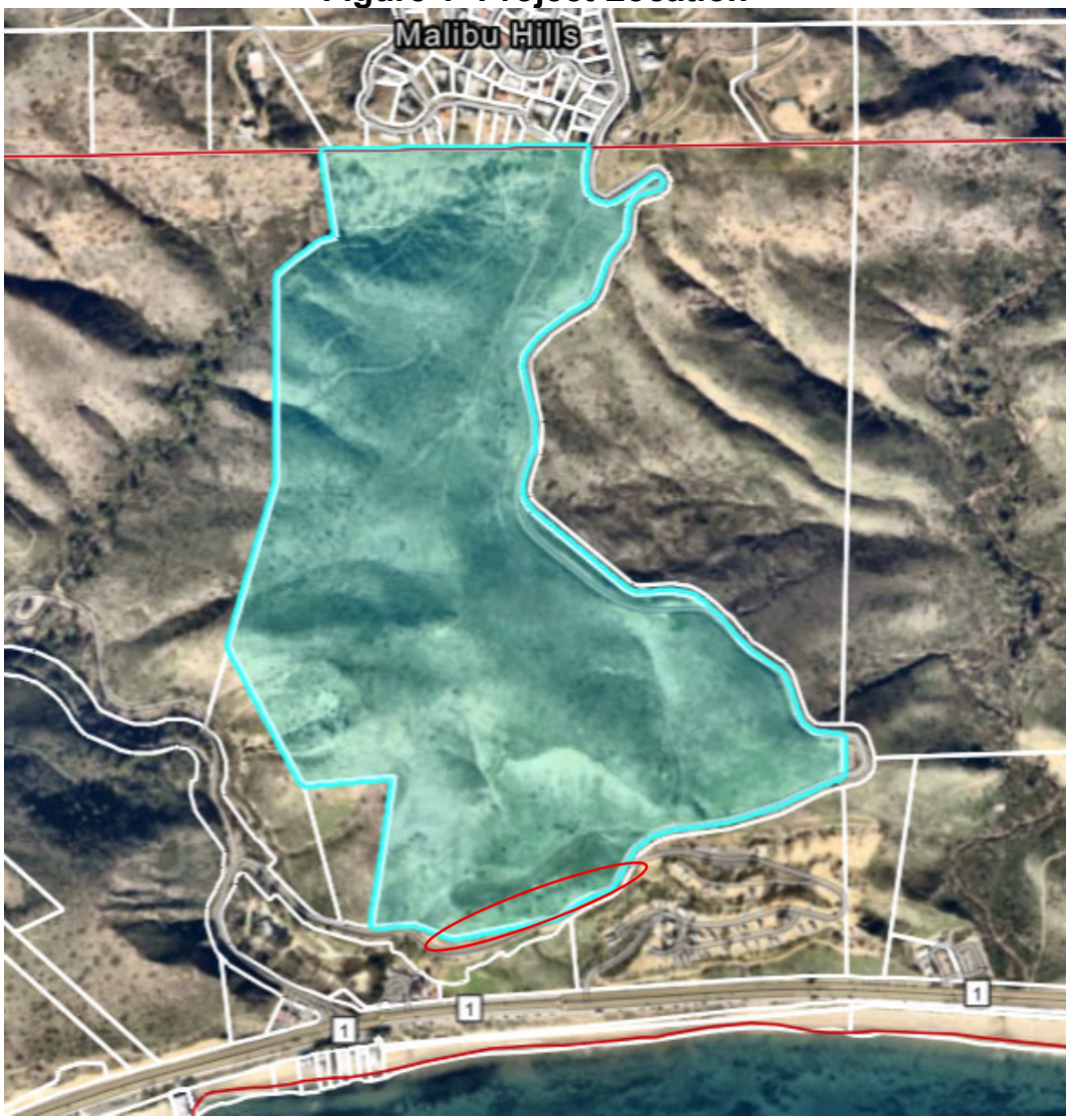
Site Setting and Project Description

An ECDP was issued on March 24, 2026 for a temporary LADWP utility laydown yard to support ongoing fire restoration efforts in Pacific Palisades. The approval included four storage trailers, grading of a new access driveway on slopes steeper than 2.5 to 1, fencing, and the placement of permeable aggregate base on active areas. Grading permits were issued and the majority of the grading was completed. However, the work was halted to comply with a condition of the ECDP which required that the use cease if a Coastal Development Permit (CDP) were not obtained within 90 days. Other than the driveway grading, the clearing of site vegetation, and the installation of site fencing, no structures approved under the ECDP have been placed on the site.

In addition to the development approved under the ECDP, the follow up CDP proposes Dark Sky compliant lighting, six portable toilets, and four additional trailers- for a total of eight storage trailers as shown in the project plans (Exhibit 1). The applicant also proposes that the site would be permitted as a utility laydown yard for a duration of seven years, after which the site would be restored.

The parcel is approximately 97 acres and is located between Corral Canyon Park and Solstice Canyon. The parcel is a vacant lot and irregularly shaped, following the majority of Corral Canyon Road until it reaches City limits where its northern property line borders an unincorporated residential community. The parcel is owned by LADWP and is zoned Rural Residential – 20 acres. The parcel is privately owned and the project area is not open to the general public like the parklands to the north, west (Solstice Canyon), and east (Corral Canyon Park). The project site is located on the southernmost portion of the parcel and will occupy approximately two acres of the site as marked with a red outline in Figure 1. The project area has been heavily disturbed dating back to the 1940's where aerial evidence shows the subject area was originally graded.

Figure 1- Project Location



Source: City of Malibu GIS, (2022)

Biological Resources And ESHA

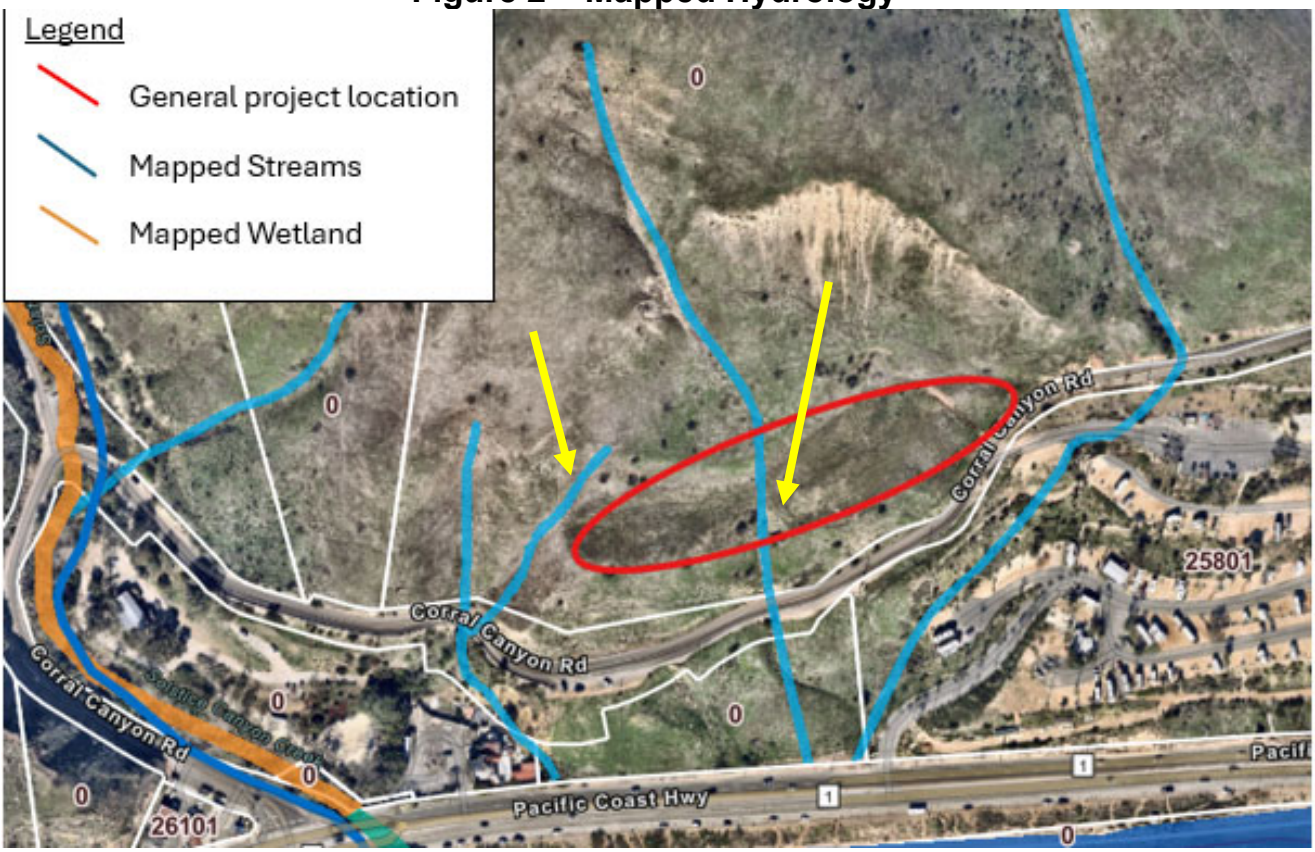
The entire parcel is mapped as ESHA as shown on the Local Coastal Program ESHA and Marine Resources Map. As shown in Figure 2, there were mapped streams pursuant to the National Wetlands Inventory but not according to the LCP ESHA maps. Pursuant to LIP Section 4.3(C): "*If the applicant's site-specific biological study or other independent information contains substantial evidence that an area previously shown on the ESHA overlay does not contain habitat that meets the definition of "environmentally sensitive area", the City shall determine the physical extent of habitat that does meet the definition of "environmentally sensitive area" on the project site."* Further LIP Section 4.3(C) states, *"If an area is not ESHA or ESHA buffer, LCP policies and standards for protection of ESHA and ESHA buffer shall not apply and development may be permitted (consistent with all other LCP*

requirements) even if the LUP ESHA Map and ESHA Overlay Map have not yet been amended." These sections gain relevance later in this report.

Prior to approving the ECDP, multiple biological surveys were conducted on the site by Aspen Environmental Group (Aspen) and a Biological Assessment (BA) was prepared by the Environmental Planning and Assessment division of LADWP in July 2025 and an assessment specific to the ESHA determination was prepared March 2026, with an addendum prepared in July 2026 (Exhibits 2-4). The consultant group and LADWP staff conducted site visits, mapped biological resources, reviewed relevant databases, and evaluated the site under the ESHA standards of the Malibu LCP.

A field survey was conducted on May 26,2025 and located the riverine that bisects the area and documented no features or characteristics to indicate the area supported significant hydrology or hydric soils. The City Biologist conducted a site visit on September 15, 2025, and surveyed the mapped riverine that bisects the property and the mapped riverine within 100 feet of the project site, marked with arrows in Figure 2. A culvert was seen on Corral Canyon Road, which presumably serves as a drainage area. The City Biologist concurs that there is a lack of flow features or concavity, and a defined channel or riparian vegetation was not observed.

Figure 2 – Mapped Hydrology



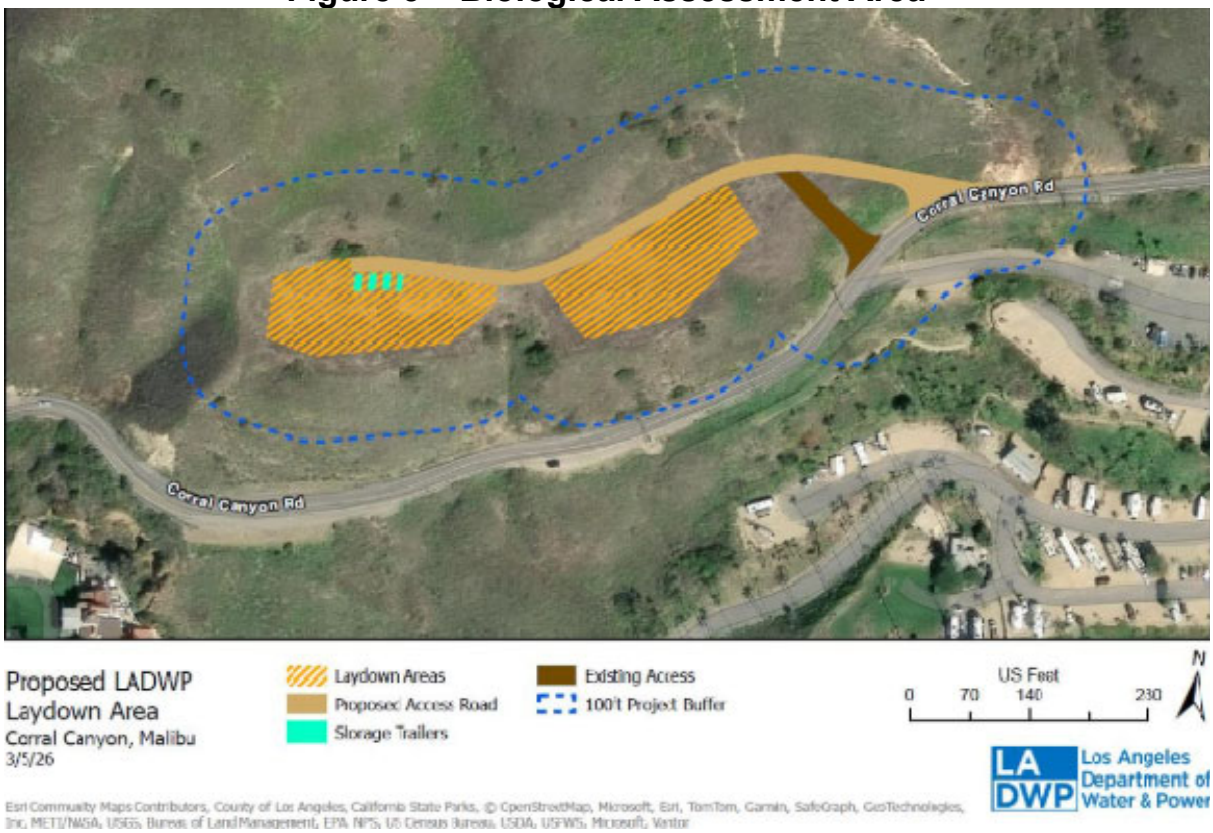
Source: City of Malibu GIS, (2022)

In Section 3.2 of the July 2025 BA's findings, it states that special status wildlife species identified during the habitat assessment have the potential to occur in the project area, within disturbed areas, or within the undeveloped portions of the Santa Monica Mountains but the July 2026 addendum confirms that it does not currently contribute to the viability of any special status species.

The March 2026 assessment and July 2026 addendum provide analysis of the site's ESHA determination using the criteria in LIP Section 4.3 ESHA Determination B and guidelines from a February 6, 2003 California Coastal Commission memorandum. The BAs concluded that the project site and its surrounding vicinity are not ESHA because although there is a range of special status species that have some potential to occur on the site, the habitat lacks any viability and does not currently contribute to habitat for any special status species due to the predominant presence of exclusionary invasive species. Required restoration activities may better enhance the site to where it could start to contribute to the viability of special status species, leaving the site in better condition than it was when LADWP began occupying the lot for staging activities.

The area assessed for ESHA is shown in Figure 3. The blue line is the edge of the surveyed area.

Figure 3 – Biological Assessment Area



Source: LADWP ESHA Assessment (March 2026)

While no special status species were seen during the surveys, precautionary measures shall be taken to preserve any potential for special status species in the future. The Avoidance and Mitigation Measures in Appendix A of the March 2026 assessment shall be implemented as a condition of approval. The potential for habitat does not make an area ESHA pursuant to the LCP, instead ESHA is evaluated under LIP Section 4.3(B)(1-6). The site did not meet any of the six criteria for being an ESHA, as surveyed by the applicant's biologist and confirmed by the City's Biologist through a site visit and evaluation of the evidence in the record:

1. There was no habitat area that is rare or especially valuable from a local, regional, or statewide basis.

2. There was no habitat area that contributes to the viability of plant or animal species that are designated or are candidates for listing as rare, threatened, or endangered under State or Federal law.

3. There was no habitat area that contributes to the viability of species that are designated "fully protected" or "species of special concern" under State law or regulations.

4. There was no habitat area that contributes to the viability of species for which there is other compelling evidence of rarity, for example plant species eligible for state listing as demonstrated by their designation as "1b" (Rare or endangered in California and elsewhere) or designation as "2" (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society.

5. There was no designated Area of Special Biological Significance, or Marine Protected Area.

6. There were no streams identified within 100 feet of the project area.

The initial surveys showed Narrow Leaf Milkweed on the site and the project area was classified as a monarch (*Danaus Plexippus Plexippus*) breeding habitat. However, the location is not considered special status as it is not an overwintering habitat. Nevertheless, a seeding plan prepared by Aspen (Exhibit 5) was submitted prior to clearing the site and details the replacement of the milkweed; including a monitoring plan to ensure the habitat is restored. The project will be conditioned to follow the reseeding and monitoring plan proposed.

The City Biologist confirmed that there were no native protected trees on site and a formal tree survey was not required.

Following required restoration of the site after development activities have ceased, there is potential for the site to be more of a viable habitat then it was prior to LADWP occupying the lot for staging activities.

Archaeology

Prior to grading the site for the approved work under the ECDP, an initial evaluation was conducted by Aspen on May 15, 2026. While the project site is within .25 miles of four archaeological resources, Aspen concluded that there is no indication of prehistoric or historic archaeological resources in the project area. A green glass bottle was found, likely from the early 20th century, however it is not eligible to the state register and does not qualify as a unique archaeological resource under the California Environmental Quality Act (CEQA). Aspen determined that any proposed improvements would have no adverse impacts to known cultural resources. The project area is proposed on a previously disturbed pad that appears to have been heavily graded in 1947, as shown in an aerial image in Aspen's archeology report (Figure 4).

Figure 4 – 1947 Aerial



Source: Aspen Environmental Group (May 2026)

As a result, the proposed development is not expected to have a significant impact on cultural resources. Accordingly, staff determined that no further study is required at this time and any proposed improvements within the project area will have no adverse impact on known or potential cultural resources. As previously stated, the

majority of the grading has been completed and to date, no archaeological resources have been found. The only new grading that occurred was under the ECDP for the a new access driveway. The previously graded pad from 1947 was de-shrubbed to make way for a clear staging area but was not expanded or graded further.

Nevertheless, conditions will be included in the Planning Commission resolution for this project which state that in the event that potentially important cultural resources are found in the course of geologic testing or construction, work shall immediately cease until a qualified archaeologist can provide an evaluation of the nature and significance of the resources and until the Planning Director can review this information.

Department Reviews

The project was reviewed and approved by the City Biologist, City geotechnical consultant reviewers, and the City Public Works Department. All conditions of approval from the various departments are included as Exhibit 6.

ENVIRONMENTAL REVIEW: Pursuant to the authority and criteria contained in CEQA, the Community Development Director has analyzed the proposed project. The Community Development Director found that this project is listed among the classes of projects that have been determined not to have a significant adverse effect on the environment. Therefore, the proposed project is categorically exempt from the provisions of CEQA pursuant to Sections 15303 – New Construction and 15304 – Minor Alterations to Land. The Community Development Director has further determined that none of the six exceptions to the use of a categorical exemption apply to this project (CEQA Guidelines Section 15300.2).

PUBLIC CORRESPONDENCE: The City has received some public concern regarding the location of the project. Specifically, Mr. Frank Angel has posited some concerns related to the site being ESHA and the potential for the project to disrupt ESHA (Exhibit 7). To date Mr. Angel has been relying on the basis that the area is mapped ESHA. As mentioned previously in this report, mapped ESHA that is determined to not be ESHA through a site-specific biological study, which was done here, is not ESHA and is not awarded the same protections as defined ESHA. The determination of no ESHA within the project site or within 100 feet of the project site was evaluated by the applicant's biologist and confirmed by the City's Biologist through a site visit. The ERB should consider the public correspondence and weigh the evidence herein in order to make proper recommendations to the Planning Commission on whether the site is ESHA.

SUMMARY: The project has been reviewed and conditionally found to conform to the Malibu LCP. The ERB can, among other things, make recommendations on whether the site is ESHA or not, and recommend additional mitigation and/or restoration measures for the Planning Commission to consider.

STAFF FOLLOW-UP: Recommendations of the ERB will be incorporated into a supplemental agenda report for the Planning Commission's review and consideration.

EXHIBITS:

1. Project Plans
2. July 2025 Biological Resources Assessment
3. March 2026 ESHA Assessment
4. July 2026 ESHA Assessment Addendum
5. Narrow Leaf Milkweed Seeding Plan
6. Department Review Sheets
7. Public Correspondence

CONSTRUCTION NOTES

1. ALL WORK SHALL BE IN ACCORDANCE WITH THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, LATEST ADDITION.
2. A COPY OF THE GRADING PERMIT AND GRADING PLAN MUST BE IN THE POSESSION OF A RESPONSIBLE PERSON AND AVAILABLE AT THE SITE WHILE WORK IS IN PROGRESS.
3. ALL CUT AND FILL SLOPES SHALL NOT BE STEEPER THAN 2 HORIZONTAL TO 1 VERTICAL EXCEPT WHERE SPECIFICALLY APPROVED OTHERWISE.
4. FILL AREAS SLOPING STEEPER THAN 5:1 SHALL BE KEYED AND BENCHED TO SUPPORT FILL.
5. FILL MATERIALS SHALL BE PLACED IN LAYERS NOT EXCEEDING 6 INCHES IN COMPACTED THICKNESS AND COMPACTED AT OPTIMUM MOISTURE CONTENT BY APPROVED METHOD.
6. ALL FILL TO BE COMPACTED TO A MINIMUM OF 90% DENSITY OF THE MAXIMUM DENSITY AND SO CERTIFIED BY TESTS AND REPORTS PERFORMED BY A SOILS ENGINEER.
7. SURVEY DATUM: HORIZONTAL CALIFORNIA COORDINATE SYSTEM 1983, ZONE 5, 2025_00; VERTICAL NORTH AMERICAN VERTICAL DATUM 1988.
8. ELEVATIONS SHOWN IN PARENTHESIS ARE EXISTING.
9. DASHED CONTOUR LINES INDICATE EXISTING GRADE.
10. ALL ELEVATIONS ARE FINISHED GRADE EXCEPT AS NOTED.
11. GRADING OPERATIONS MUST BE CONDUCTED UNDER PERIODIC GEOLOGIC INSPECTION WITH INSPECTION REPORTS TO BE SUBMITTED TO THE PUBLIC WORKS DEPT.
12. EXCESS SOIL AND ANY UNSUITABLE MATERIAL MUST BE TRANSPORTED AND DISPOSED AT A LEGAL, PERMITTED DUMP SITE.
13. THE GEOTECHNICAL ENGINEER SHALL BE NOTIFIED TO INSPECT AND APPROVE THE EXPOSED SUBGRADE OR BOTTOM OF THE EXCAVATED AREAS BEFORE PLACING ANY COMPACTED FILL MATERIAL. NOTIFY THE GEOLOGY/GEOTECHNICAL GROUP AT 213-367-4192 AT LEAST 48 HOURS IN ADVANCE OF ANY SOIL INSPECTIONS.
14. ALL CHAIN LINK FENCING MATERIALS SHALL BE IN ACCORDANCE WITH DWP STANDARD SPECIFICATION NO. G-106-R3.
15. EARTHWORK SHOULD BE PERFORMED IN ACCORDANCE WITH THE APPLICABLE SECTIONS OF THE LOS ANGELES CITY GRADING CODES, THE LATEST EDITION OF THE SSPWC (GREENBOOK, 2024).
16. PRIOR TO CONSTRUCTION, THE AREAS PLANNED FOR NEW CONSTRUCTION SHOULD BE CLEARED OF EXISTING IMPROVEMENTS AND ANY OTHER DELETERIOUS MATERIALS. VEGETATION, TRASH, AND DEBRIS SHOULD BEPROPERLY DISPOSED OFFSITE. UNDERGROUND SERVICE ALERT (USA) OF SOUTHERN CALIFORNIA, ALSO KNOWN AS DIG ALERT SHALL BE CONTACTED TO LOCATE AND VERIFY ANY EXISTING OR ABANDONED UTILITY LINES IN THE AREA PLANNED FOR CONSTRUCTION. EXISTING UTILITIES SHOULD BE EITHER PROPERLY ABANDONED AND REMOVED OR REROUTED AROUND THE DEVELOPMENT AREA TO PRESERVE THEIR FUNCTION. EXCAVATIONS THAT RESULT FROM THE REMOVAL OF UTILITIES AND OTHER EXISTING SITE IMPROVEMENTS SHOULD BE PROPERLY BACKFILLED AND COMPACTED.
17. LADWP CORPORATE ENVIRONMENTAL SERVICES GROUP SHALL BE CONTACTED IMMEDIATELY IF SOIL OF A QUESTIONABLE ENVIRONMENTAL QUALITY IS ENCOUNTERED DURING CONSTRUCTION. THE QUESTIONABLE SOIL SHALL THEN BE PLACED IN PLASTIC AND LABELED AS SOIL NOT TO BE USED FOR BACKFILL.
18. IF UNSUITABLE SOILS ARE ENCOUNTERED DURING EXCAVATION, ADDITIONAL EXCAVATION TO REMOVE THE UNSUITABLE MATERIALS TO EXPOSE A FIRM AND UNYIELDING SURFACE WILL BE REQUIRED.
19. PRIOR TO PLACING FILL, THE SUBGRADE SHALL BE SCARIFIED TO A DEPTH OF 6 INCHES, MOISTURE-CONDITIONED TO APPROXIMATELY 2 PERCENT ABOVE OPTIMUM AND COMPACTED TO AT LEAST 90 PERCENT RELATIVE COMPACTION. THE FINISH SUBGRADE SHOULD BE MAINTAINED MOIST AT ALL TIME PRIOR TO PLACING FILL OR OTHER IMPROVEMENTS.
20. ALL FILL MATERIALS SHALL BE INORGANIC SOILS FREE OF VEGETATION, DEBRIS, AND COBBLES LARGER THAN 3 INCHES IN DIAMETER.
21. ENGINEERED FILL SHOULD BE PLACED IN LOOSE LIFTS NOT TO EXCEED 8 INCHES, MOISTURE-CONDITIONED TO 2 PERCENT ABOVE ITS OPTIMUM MOISTURE, AND COMPACTED TO AT LEAST 90 PERCENT RELATIVE COMPACTION IN ACCORDANCE WITH ASTM D1557.
22. TEMPORARY EXCAVATIONS MUST BE PROPERLY SLOPED OR SHORED IN ACCORDANCE WITH OSHA STANDARDS.
23. THE CONTRACTOR IS RESPONSIBLE FOR WORKER SAFETY IN THE FIELD DURING CONSTRUCTION. THE CONTRACTOR SHALL CONFORM TO ALL APPLICABLE OCCUPATIONAL SAFETY ANO HEALTH STANDAROS, RULES, REGULATIONS, AND ORDERS ESTABLISHED BY THE STATE OF CALIFORNIA.
24. PRIOR TO PLACEMENT OF CRUSHED AGGREGATE BASE (CAB), THE SUBGRADE SOILS SHALL BE EXCAVATED TO MINIMUM DEPTH OF 6 INCHES BELOW PROPOSED DEPTH AND RECOMPACTED TO A MINIMUM OF 90 PERCENT RELATIVE COMPACTION BASED ON THE MAXIMUM DRY DENSITY DETERMINED BY ASTM D1557.
25. CAB SHALL SATISFY THE SPECIFICATIONS CONTAINED IN THE SSPWC FOR GRADATION AND SHOULD HAVE A MINIMUM R-VALUE OF 78. ALL GRADATION AND R-VALUE SHOULD BE CONFIRMED BY THE GEOTECHNICAL ENGINEER DURING CONSTRUCTION. ALL BASE MATERIALS SHOULD BE COMPACTED TO A MINIMUM OF 95 PERCENT OF THE MAXIMUM DRY DENSITY PER ASTM 01557.

ESTIMATED EARTHWORK QUANTITIES

PROJECT NUMBER ECDP 25-017
PROJECT ADDRESS 4000 CORRAL CANYON RD

REPORT CREATED BY BENTLEY OPENROADS DESIGNER 2023

TERRAIN CALCUATION

CUT FACTOR = 1.0	FILL FACTOR = 1.0
19800 CUBIC FEET	3067 CUBIC FEET
734 CUBIC YARDS	114 CUBIC YARDS

BALANCE 620 CUBIC YARDS
CUT 735 CUBIC YARDS
FILL (CAB): 133 CUBIC YARDS

LEGEND:

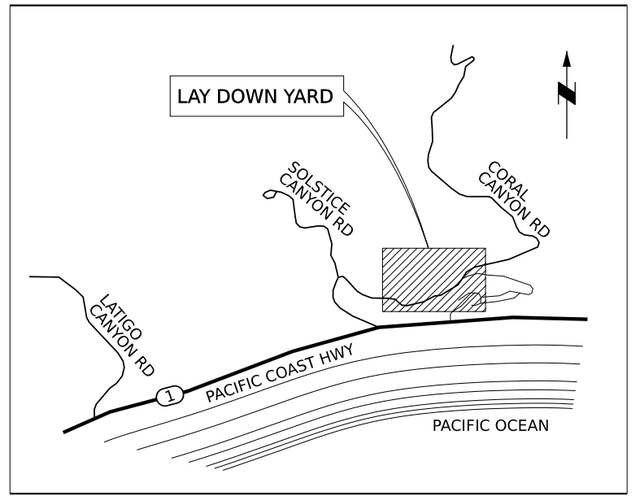
● SIGICOM INFRA C22 - WIRELESS TRIAXIAL VIBRATION MONITOR

1. PER THE RECOMMENDATIONS IN THE "Revised Preliminary Geotechnical Report" DATED 11/24/2025, THE MONITORING PLAN SHALL CONSIST OF PERIODIC VISUAL OBSERVATION, PERIODIC MOVEMENT AND SETTLEMENT SURVEYS, ONSITE INSTRUMENTATION, AND ALARM ACTION PLAN AS DETAILED HEREIN.
2. THE LADWP GEOLOGY/GEOTECHNICAL GROUP SHALL PERFORM AN INITIAL SITE ASSESSMENT AT THE SRART OF CONSTRUCTION AND BI-WEEKLY FOLLOW-UP OBSERVATIONS DURING GRADING OPERATIONS. THE FREQUENCY SHALL REDUCE TO QUARTERLY FOLLOW-UP OBSERVATIONS UPON SUBSTANTIAL COMPLETION OF RADING AND CONTINUE SEMIANNUALLY UNTIL COMPLETION OF THE LAY DOWN YARD.
3. THE LADWP GEOLOGY/GEOTECHNICAL GROUP SHALL INSTALL FOUR (4) VIBRATION MONITORS AT THE LOCATIONS SHOWN UPON COMPLETION OF THE INITIAL CLEARING OF VEGETATION, TRASH, AND DEBRIS. VIBRATION MONITORS SHALL REMAIN IN PLACE FOR THE DURATION OF CONSTRUCTION AND THROUGH THE CONCLUSION OF THE FIRST RAINY SEASON FOLLOWING COMPLETION OF THE LAY DOWN YARD.
4. THE LADWP SURVEY GROUP SHALL SET PERMANENT SURVEY MONUMENTS ADJACENT TO EACH VIBRATION MONITOR AND RECORD BENCHMARK ELEVATIONS. MOVEMENT AND SETTLEMENT SURVEYS SHALL BE PERFORMED QUARTERLY UNTIL COMPLETION OF THE LAY DOWN YARD. ADDITIONAL CHECKS SHALL BE PERFORMED AFTER SIGNIFICANT RAIN EVENTS AND UPON ACTIVATION OF AN ALARM.
5. BASELINE VIBRATION MEASUREMENTS SHALL BE OBTAINED AT THE START OF CONSTRUCTION. ALARM THRESHOLDS SHALL BE SET WHEN VIBRATION SIGNALS ARE 10 mm/s ABOVE THE BASELINE PEAK SIGNAL IN EACH DIRECTION. MEASUREMENTS SHALL BE RECORDED USING THE FOLLOWING STANDARD:
   Geophone - Unfiltered geophone signal. Upper frequency limit 500 Hz.
   Level and frequency ranges: 250 mm/s, 5-500 Hz.
   Max resolution in presentation: 0.05 mm/s and 3 significant digits.
   Threshold range: 0.4 220 mm/s.
6. VIBRATION MONITORS SHALL BE CONFIGURED TO TRANSMIT AUTOMATIC NOTIFICATIONS TO THE GEOLOGY/GEOTECHNICAL GROUP WHEN VIBRATION SIGNALS EXCEED THE ALARM THRESHOLD AND RECORD TIME HISTORIES OF EACH EVENT. SUSTAINED ELEVATED VIBRATION MEASUREMENTS SHALL RESULT IN ACTIVATION OF AN ALARM.
7. UPON ACTIVATION OF AN ALARM, THE SURVEY GROUP SHALL BE NOTIFIED AND THE GEOLOGY/GEOTECHNICAL GROUP OR DESIGNATED REPRESENTATIVE SHALL INSPECT THE SITE FOR SIGNS OF DEFORMATION OR SETTLEMENT, AND INVESTIGATE THE CAUSE OF THE ALARM ACTIVATION.
8. DURING CONSTRUCTION, THE GEOLOGY/GEOTECHNICAL GROUP SHALL IMMEDIATELY CONTACT THE SUPERVISOR TO ISSUE AN IMMEDIATE ALL-STOP UPON ACTIVATION OF AN ALARM DURING NORMAL WORKING HOURS. CONSTRUCTION ACTIVITIES SHALL NOT RESUME UNTIL CLEARANCE IS ISSUED BY THE GEOLOGY/GEOTECHNICAL GROUP.
9. FOR ALARM NOTIFICATIONS RECEIVED OUTSIDE OF NORMAL WORKING HOURS, THE GEOLOGY/GEOTECHNICAL GROUP SHALL NOTIFY THE CONSTRUCTION SUPERVISOR OF THE EVENT AT THE START OF THE NEXT SHIFT AND RECOMMEND REDUCED SITE ACTIVITY FOR A SPECIFIED DURATION, IF NECESSARY.
10. AN ALARM WILL NOT BE ACTIVATED FOR ALARM NOTIFICATIONS THAT COINCIDE WITH A RECORDED SEISMIC EVENT WITHIN 10 MILES OF THE SITE WITH A MAGNITUDE BELOW M3. THE GEOLOGY/GEOTECHNICAL GROUP SHALL PERFORM A FOLLOW-UP OBSERVATION AFTER RECORDED SEISMIC EVENTS WITH A MAGNITUDE M3+ UP TO M4. AN ALARM WILL BE ACTIVATED FOR ALARM NOTIFICATIONS THAT COINCIDE WITH A RECORDED SEISMIC EVENT WITH A MAGNITUDE M4+.
11. UPON COMPLETION OF THE LAY DOWN YARD, VISUAL OBSERVATIONS AND MOVEMENT AND SETTLEMENT SURVEYS SHALL BE PERFORMED ON AN ANNUAL BASIS UNTIL THE SITE IS VACATED. OBSERVATION REPORTS, MOVEMENT AND SETTLEMENT SURVEYS, AND LOGS FROM THE VIBRATION MONITORS SHALL BE COMPILED AND SUBMITTED TO THE CITY'S GEOLOGIST ON AN ANNUAL BASIS OR UPON REQUEST.

ABBREVIATIONS

ASPH	ASPHALTIC CONCRETE
CAB	CRUSHED AGGREGATE BASE
CONC	CONCRETE
CY	CUBIC YARD
D	DEGREE
DIA	DIAMETER
DWP	DEPARTMENT OF WATER AND POWER
E.	EASTING
EG	EXISTING GRADE
EL	ELEVATION
ELEC	ELECTRICAL
EXIST	EXISTING
FDN	FOUNDATION
FG	FINISH GRADE
FL	FLOW LINE
FS	FINISHED SURFACE
FT	FEET
GB	GRADE BREAK
L	LENGTH
MIN	MINIMUM
N.	NORTHING
PC	POINT OF CURVATURE
PI	POINT OF INTERSECTION
PP	POWER POLE
R	RADIUS
S	SOUTH
T	TANGENT
TYP	TYPICAL
VAR	VARIES
W	WEST

VICINITY MAP



City of Malibu
23825 Stuart Ranch Road · Malibu, California · 90265-4861
Phone (310) 456-2489 · Fax (310) 456-7650 · www.malibucity.org

TOTAL GRADING YARDAGE VERIFICATION CERTIFICATE
PLANNING DEPARTMENT REVIEW LEVEL

PROJECT NUMBER: ECDP 25-017
PROJECT ADDRESS: 4000 Corraly Canyon Rd

The completed form must be provided at the time of Planning Department application for grading approval. All applicable cubic yardages shall be completed in the table. **All calculations utilized to estimate the cubic yardages indicated shall be attached to this form**. This form and the required calculations must be prepared by a State of California Licensed Civil Engineer. The form and the calculations shall be stamped and wet signed by the preparing party.

	Exempt			Non-Exempt	Remedial	Total
	R&R	Understructure	Safety			
Cut	0	0	0	734	0	734
Fill	0	0	0	114	0	114
Total	0	0	0	848	0	848
Import	0	0	0	114	0	114
Export	0	0	0	734	0	734

All quantities indicated shall be in cubic yards only.
R&R = Removal and Recompaction – *R&R must be balanced.*
Safety Grading is required grading for L.A. County Fire Department access approval beyond the 15 foot minimum access and may include turnouts, hammerheads, turnarounds, and access roadway widening.
Remedial grading is grading recommended by a full site geotechnical or soils report prepared by a licensed geologist or soils engineer which is necessary to correct physical deficiencies on the site for the construction of a primary residential structure or access to the lot.
Imported means soil that is brought on to the site. Exported means soil that is leaving the site. This information will be used to calculate the number of truck trips required for site preparation.

PREPARED BY: Fernando Alcocer
PRINT NAME
SIGN NAME
DATE: March 26, 2026

Page 1 of 1
P:\Forms\COUNTER FORMS\PLN Grading Verification Certificate_180201.doc

DES. ENGR. FERNANDO ALCOCER
SUP. ENGR. JOSH PANG

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GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

EXHIBIT 1

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA1
REV.

SEE DRAWING NUMBER U002-CA3
STA 3+30.62 TO STA 7+49.27

N.1836023.77
E.6337240.50

N 5+41.64
L 94.73 (R)
Δ 13°31'34"
D 12.49°
L 134.36'
R 158.00'

4" CAB

PORTA POTTIES

4" CAB TRAILER, TYP.

PORTA POTTIES

4" CAB

PORTA POTTIES

4" CAB

R 7+16.11
Δ 10.5682° (LT)
D 9.4652°
T 17.76'
L 35.41'
R 192.00'

EXISTING FENCE TO REMAIN

VIBRATION MONITORING EQUIPMENT TYP

EXISTING DRAIN

CORRAL CANYON ROAD

CORRAL CANYON ROAD

BPP# NO TAG

PLAN

1:30

Scope of Work:

Install approximately 750 ft CAB access road from Corral Canyon Rd. Access road width is 16-ft wide with cross slope of 2%; and connects to Corral Canyon Rd with a driveway. Access road will serve LADWP laydown for equipment and material storage purposes.

Entrance, access road and laydown area will be installed with 4"compacted CAB. Driveway edge daylights to existing grade at limits as shown in the plan at 2:1 slope. Refer to profile on U002-CA4. See Construction Notes, Geotechnical Vibration Monitoring Plan and Abbreviations on U002-CA1.

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GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

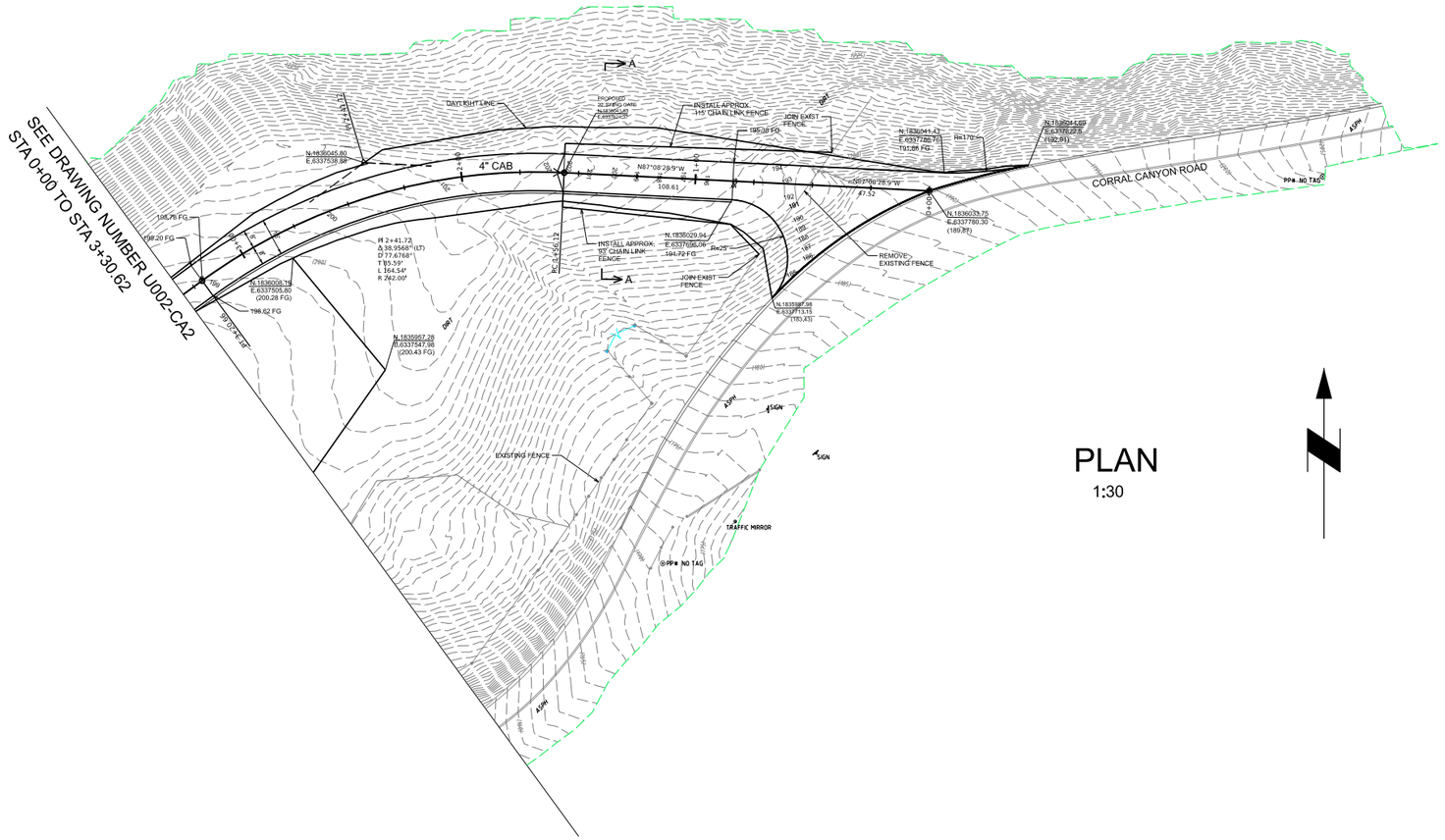
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U002-CA2

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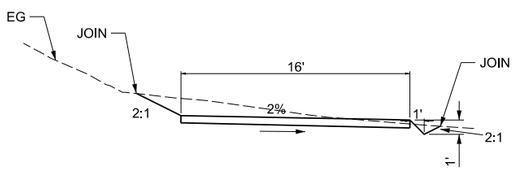
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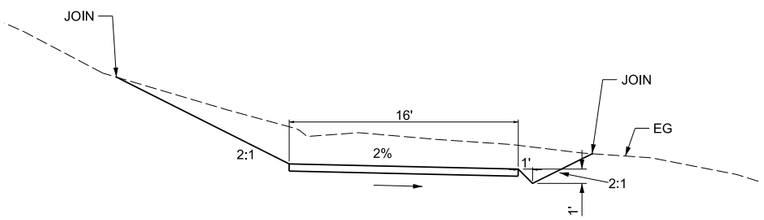
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PLAN
1:30



SECTION B-B



SECTION A-A

REGISTERED PROFESSIONAL ENGINEER — JENNIFER VANEGAS — C 85909 — EXP. 09/30/2026 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — FERNANDO ALCOCER — No. 70713 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — LIPING YAN — No. GE 2554 — EXP. 12/31/2026 — PROTECH/CE — STATE OF CALIFORNIA

DES. ENGR. FERNANDO ALCOCER
SUP. ENGR. JOSH PANG

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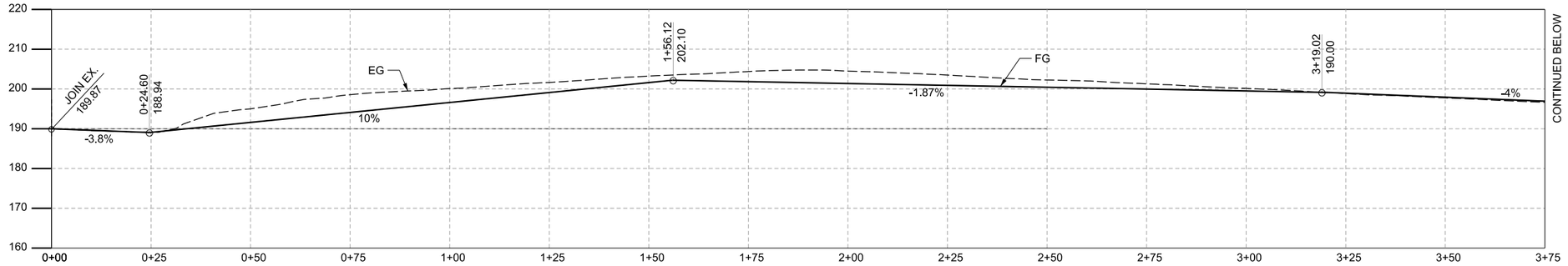
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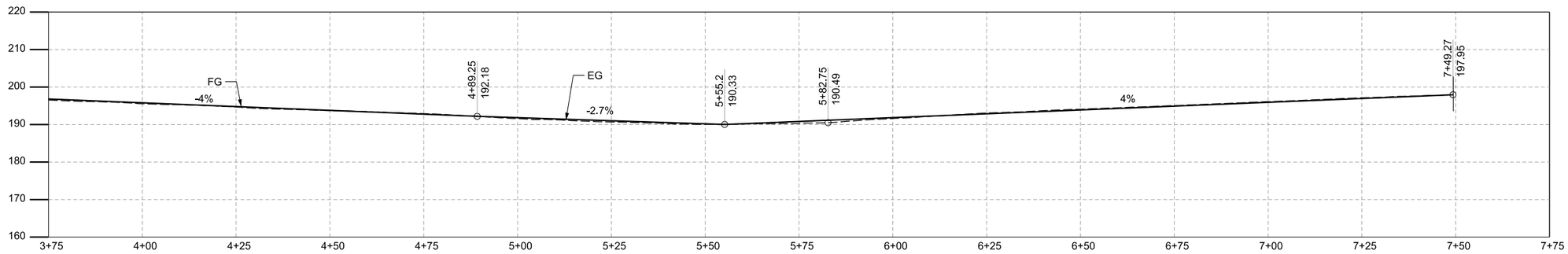
GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA3

REV.:





ACCESS ROAD

C/85909
EXP. 09/30/2026
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
FERNANDO ALCOCER
No. 70713
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
No. GE 2554
EXP. 12/31/2026
GEOTECHNICAL
STATE OF CALIFORNIA

DES. ENGR. FERNANDO ALCOCER
SUP. ENGR. JOSH PANG

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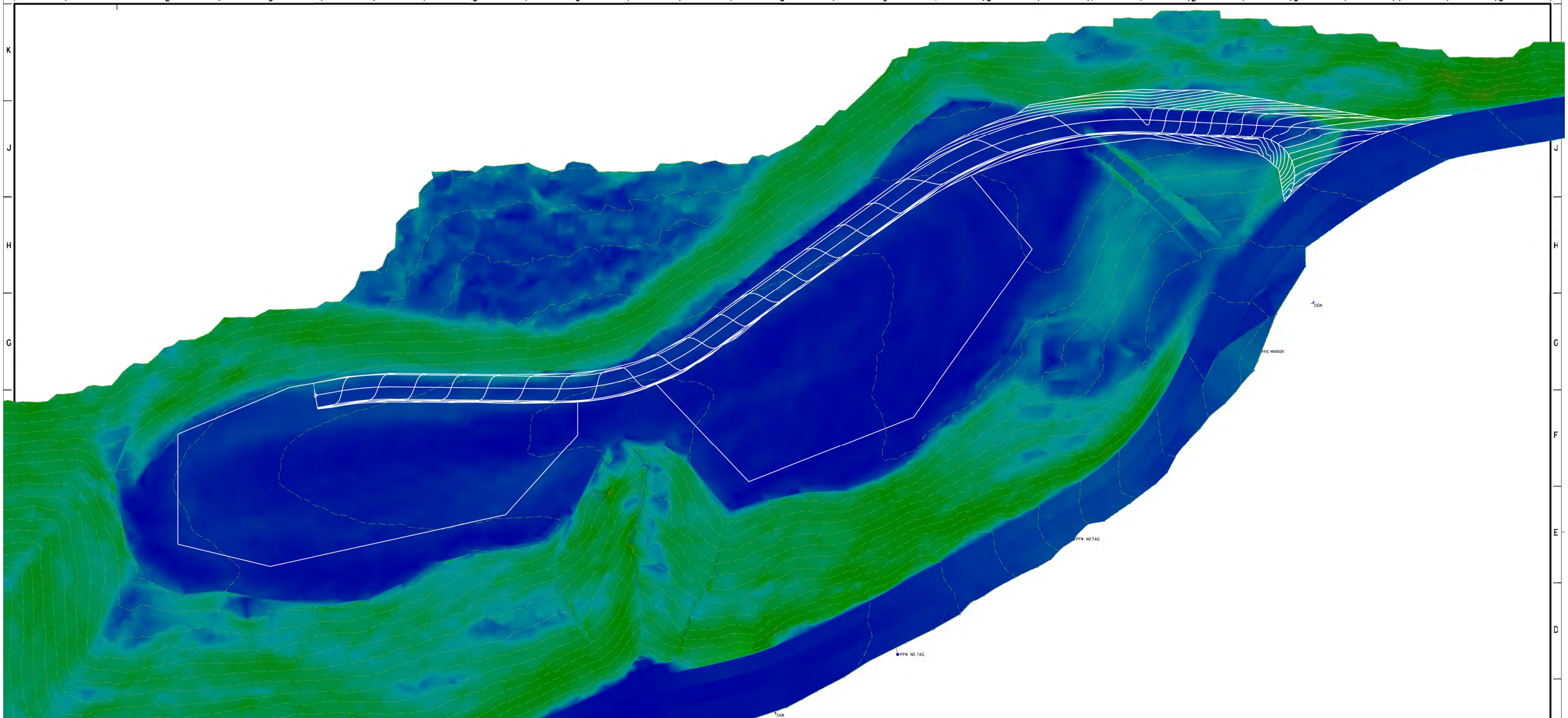
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GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

DWP
POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA4
REV.



SLOPE ANALYSIS LEGEND

LESS THAN 4:1	
4:1 TO 3:1	
3:1 to 2 1/2,1	
2 1/2:1 to 1:1	

REGISTERED PROFESSIONAL ENGINEER — CHARLES TAM ALCOCER — No. C85909 — EXP. 09/30/2026 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — FERNANDO ALCOCER — No. 70713 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — No. GE 2564 — EXP. 12/31/2026 — GEOTECHNICAL — STATE OF CALIFORNIA

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GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA5

REV.



LEGEND:

STABILIZED ENTRANCE

FIBER ROLLS

STORMWATER FLOW DIRECTION

BEST MANAGEMENT PRACTICES

Erosion Control Practices	
BMP Description	
Erosion Controls	
Scheduling	EC-1.
Sediment Controls	
Silt Fence	SE-1
Gravel Bag Barrier	SE-6
Fiber Rolls	SE-5
Stabilized Construction Entrance	TC-1
Street Sweeping and Vacuuming	SE-7
Non-Storm Water Management	
Water Conservation Practices	NS-1
Waste Management	
Material Delivery and Storage	WM-1
Stockpile Management	WM-3
Spill Prevention and Control	WM-4
Solid Waste Management	WM-5
Sanitary/Septic Waste Management	WM-9

NOTE:

THE SITE CURRENTLY DOES NOT HAVE EXISTING STORM DRAINAGE FACILTIES, AND WILL REAMAIN UNCHANGED ONCE THE LAYDOWN AREA IS COMPLETED.



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SUP. ENGR. JOSH PANG

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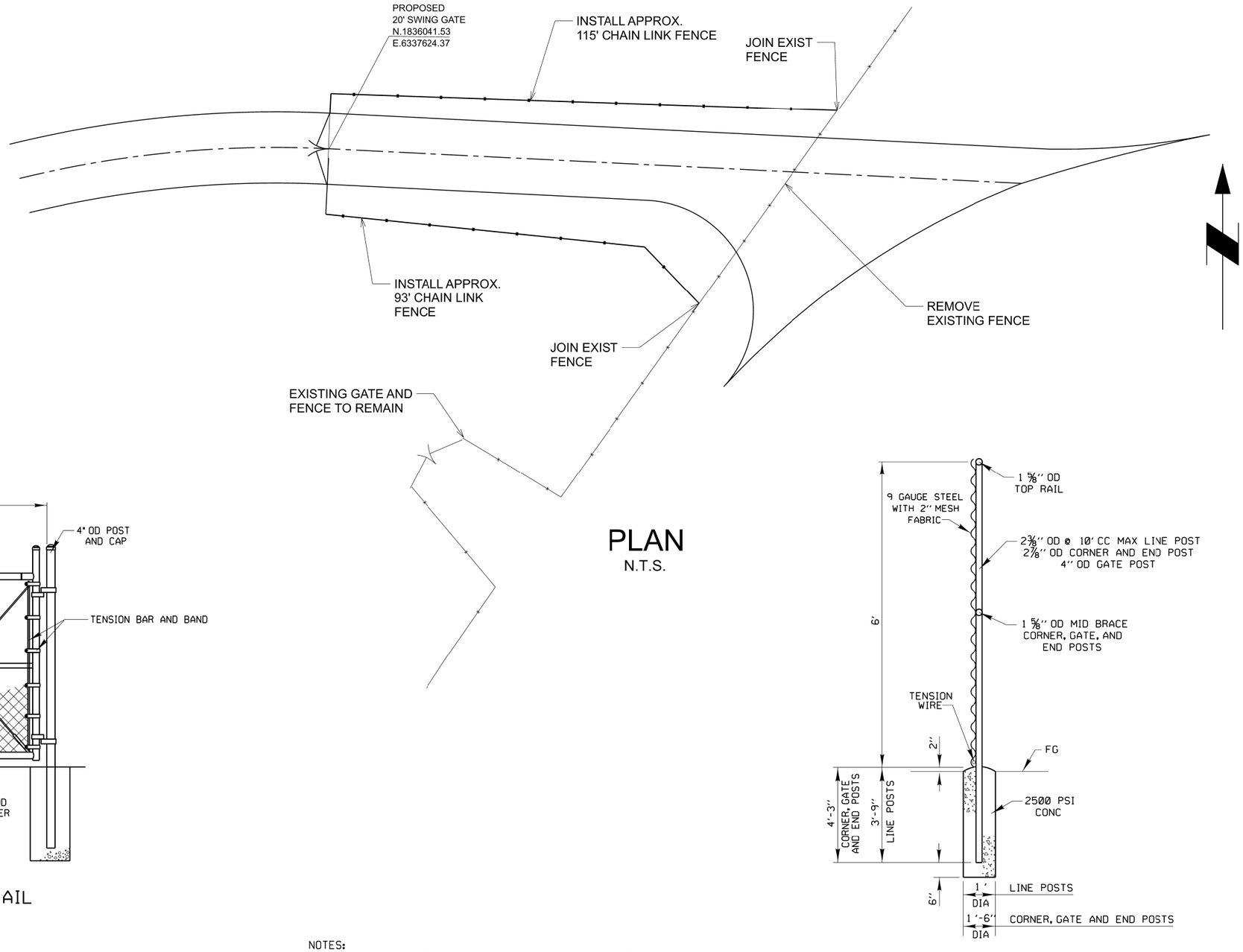
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SEDIMENT AND EROSION CONTROL PLAN
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER U002-CA6
REV.

DRA



PLAN
N.T.S.

20' DOUBLE SWING GATE DETAIL
SCALE: NONE

FENCE DETAIL
SCALE: NONE

NOTES:
1. ALL METALLIC MATERIAL SHALL BE HOT DIP GALVANIZED.
2. NEW FENCING IS APPROXIMATELY 90 LINEAR FEET.
3. REMOVE 54 FEET OF EXISTING CHAIN LINK FENCE.
4. INSTALL 208 FEET OF CHAIN LINK FENCE 6-FOOT SPACING.

DES. ENGR. FERNANDO ALCOCER
SUP. ENGR. JOSH PANG

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JOSH PANG

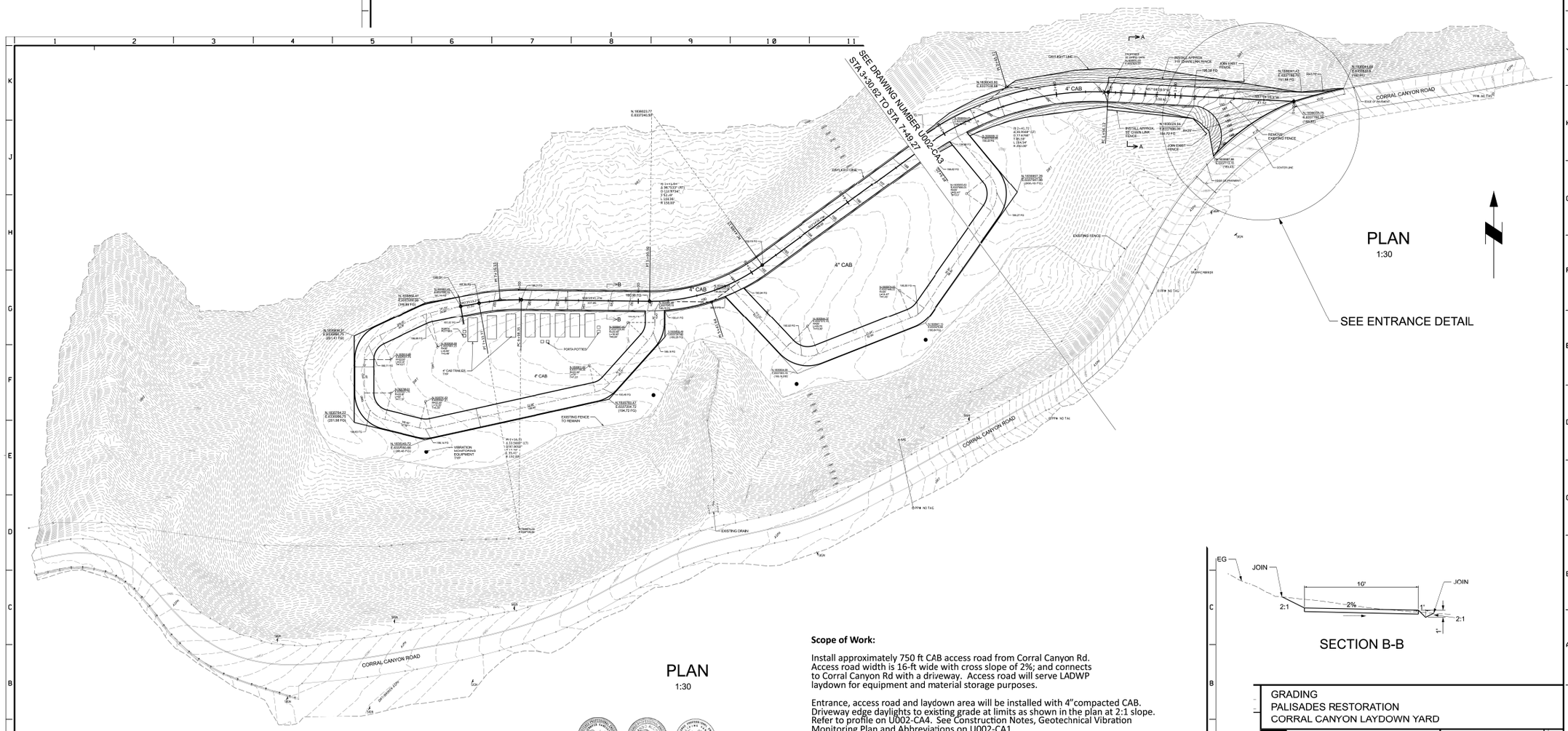
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FENCE AND GATE DETAIL
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA7
REV.

DRA



PLAN
1:30

PLAN
1:30

Scope of Work:

Install approximately 750 ft CAB access road from Corral Canyon Rd. Access road width is 16-ft wide with cross slope of 2%; and connects to Corral Canyon Rd with a driveway. Access road will serve LADWP laydown for equipment and material storage purposes.

Entrance, access road and laydown area will be installed with 4"compacted CAB. Driveway edge daylights to existing grade at limits as shown in the plan at 2:1 slope. Refer to profile on U002-CA4. See Construction Notes, Geotechnical Vibration Monitoring Plan and Abbreviations on U002-CA1.

SECTION B-B

GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

DRAWING NUMBER
U002-CA3

REV.

DES. BY: FERNANDO ALCOCER
DRAFTED BY: JOSH PANG
SUP. ENGR.:
ASST. MGR.:

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GRADING
PALISADES RESTORATION
CORRAL CANYON LAYDOWN YARD

POWER SYSTEM
DEPARTMENT OF WATER AND POWER
CITY OF LOS ANGELES

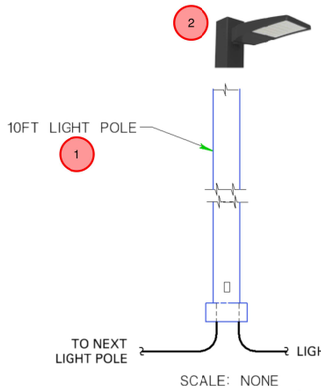
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U002-CA2

REV.

CORRAL CANYON LAYDOWN YARD

PARTS LIST

PART NO	QTY	DESCRIPTION
1	12	RAD 10FT LIGHT POLE, SQUARE, PS4-11-10D2
2	12	RAD ALEDXXS, 3000K, 6.1W, 833 LUMENS, 277V
3	11	AMERLUX AB5 FULL CUTOFF WALKWAY BOLLARD W/180 DEGREE SHIELD, 3000K, 19W, 674 LUMENS, 277V
4	1	POLYMER CONCRETE BOX ASSEMBLY, 11" x 21" x 12", TYPE 2, ANSI/SCTE 77 TIER 15 MEDIUM DUTY
5	1	FIBERGLASS REINFORCED POLYMER HANDHOLE, 30" x 48" x 36", HEAVY TRAFFIC RATED



PRELIMINARY – NOT FOR CONSTRUCTION

This drawing is submitted for conceptual review by the City, AHJ, and environmental agencies only. The lighting plan and associated photometric calculations are intended to demonstrate fixture type, general layout, shielding strategy, control intent, and anticipated lighting performance. Final construction drawings will be prepared following review of this preliminary submittal.

1. Lighting shown is preliminary and intended to convey design intent only.
2. Photometric calculations are included in this submittal for review of lighting performance and off-site impact.
3. Final construction drawings shall provide wiring, conduit routing, mounting details, and control wiring.
4. Exterior lighting is limited to the minimum necessary for vehicle guidance and essential yard operations.
5. Lighting is not intended to illuminate Corral Canyon Road, adjacent hillside areas, the ocean, or other off-site areas.
6. All exterior luminaires shall be 3000K maximum / 850 lumens maximum.
7. All exterior luminaires shall be full cutoff / fully shielded.
8. No uplight is permitted.
9. No direct view of lamp or luminous source shall be allowed from public roads, public viewpoints, or off-site properties.
10. Luminaires shall be oriented downward and toward the interior of the site.
11. Pole-mounted luminaires shall remain inboard of the slope edge as shown.
12. Bollard lights are for local cueing only and are not intended to create continuous perimeter lighting.
13. Lighting shall be motion-controlled and zoned to limit activation to the area needed.
14. Activation of the entire site from a single sensor event is not permitted by design intent.
15. Automatic shutoff shall occur within 10 minutes maximum after last detection.
16. Exterior lighting shall include automatic daylight shutoff controls.
17. Fixture substitutions are not permitted without Engineer review and revised photometric confirmation.
18. Any field condition that increases off-site visibility, glare, or spill shall be brought to the Engineer for review before installation.

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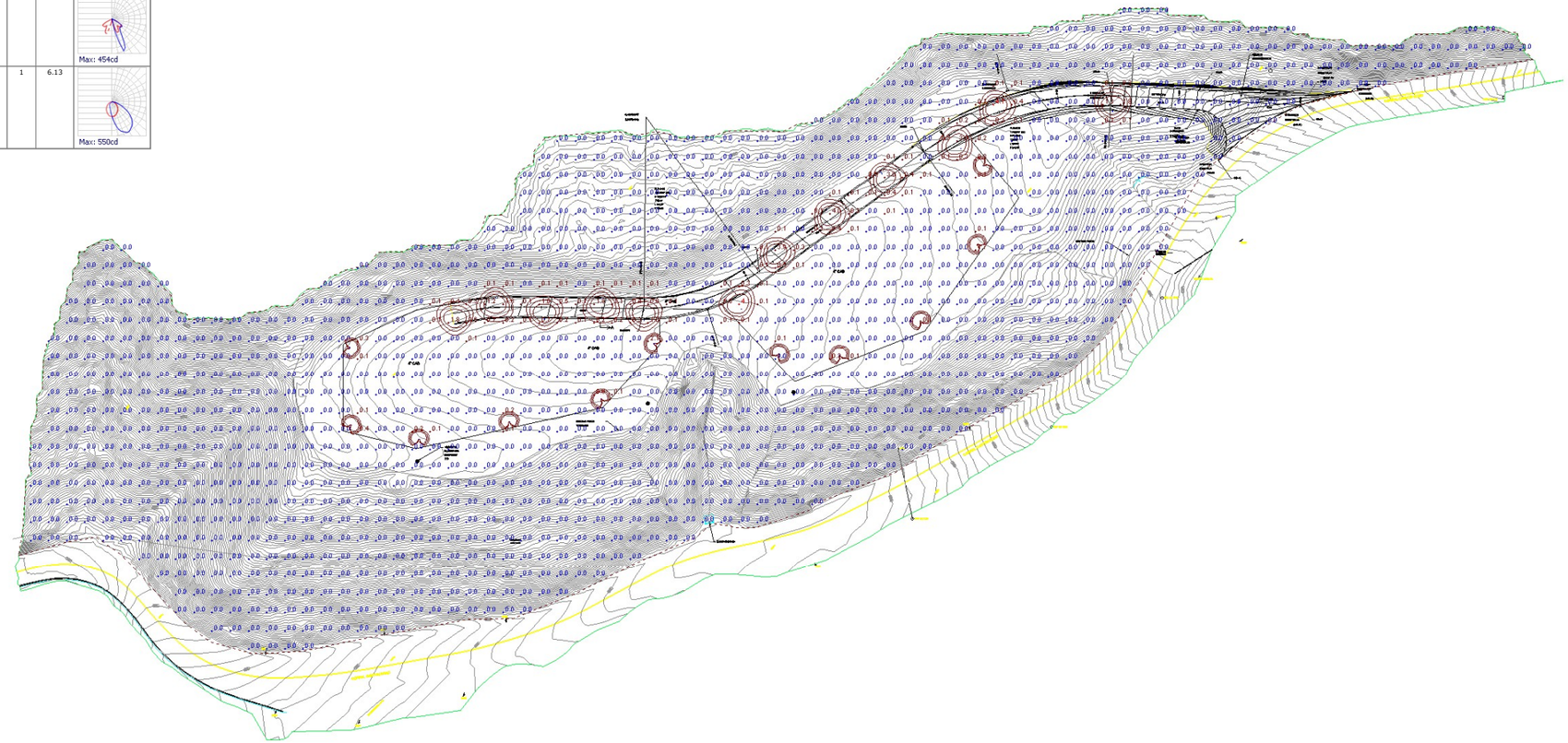
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Schedule

Symbol	Label	Image	QTY	Catalog Number	Description	Lamp	Number Lamps	Lumens per Lamp	LLF	Wattage	Polar Plot
	A		11	B5HQF1X16U3K	B5 WITH 180-DEGREE SHIELD, ONE 16W QSSI LED ARRAY		1	508	1	17	Max: 454cd
	B		12	ALEDXXS @ 6W/3000K	Outdoor - Pole/Arm-Mounted Area and Roadway Luminaires		1	833	1	6.13	Max: 550cd

Statistics

Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
Calc Zone #2	+	0.0 fc	4.1 fc	0.0 fc	N/A	N/A



Current View



The design was developed to comply with Malibu Municipal Code §17.41, with lighting limited to the minimum necessary for site access and safety given site visibility and environmental sensitivity.

- All luminaires are ≤ 3000K, fully shielded, and directed downward
- Fixture outputs are ≤ 850 lumens
- Lighting is motion-activated with ≤ 10-minute shutoff and photocell control
- Fixture placement utilizes site topography to minimize visibility from public viewing areas
- The photometric plan indicates 0.0 fc at the road/property-line interface, demonstrating compliance with light trespass limits

Photometric Calculations were made using Visual Lighting Software

Corral Canyon Staging Area Biological Resources Assessment

Prepared by:

Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

JULY 2025

EXHIBIT 2

1. Introduction

1.1 Purpose

The purpose of this Biological Assessment is to discuss planned staging activities to be conducted by the Los Angeles Department of Water and Power (LADWP) at the LADWP-owned property in Malibu, Los Angeles County, California (Assessor Parcel Number 4459-06-270) and assess the potential impacts of these activities on special-status species and habitats.

1.2 Background

The LADWP-owned Malibu property encompasses 97 acres in the Santa Monica Mountains Significant Ecological Area. The property abuts Solstice Canyon to the west, a popular hiking destination within the Santa Monica National Recreation Area administered by the National Park Service. Immediately east of the property is the recreational Malibu Beach RV Park, and Corral Canyon, an undeveloped coastal canyon administered by the Mountains Recreation and Conservation Authority (MRCA) in partnership with the Santa Monica Mountains Conservancy. The Calamigos Beach Club and Pacific Coast Highway (PCH) are just south of the site, and the Pacific Ocean is just south of PCH. The residential community of El Nido is located north of the property, commonly referred to as the Malibu Hills.

In the 1960s, LADWP proposed building a nuclear power demonstration project on the property. However, there were concerns due to seismic and fire risks, as well as significant pushback from the local community, and the facility was never constructed. The property is currently undeveloped and surrounded largely by open space. The property burned in the 2018 Woolsey Fire.

The 2025 Palisades Fire destroyed large areas of Pacific Palisades, Topanga, and Malibu, burning 23,448 acres and destroying 6,837 structures, making it the most destructive fire to occur in the history of the City of Los Angeles. LADWP's emergency response crew requires a site for emergency command staging, and they are targeting the use of LADWP landholdings near the burned areas, including the Corral Canyon property, which is located approximately 12 miles from the Pacific Palisades.

1.3 Project Description

The southern portion of the property is proposed to be utilized as a temporary utility laydown yard to support fire restoration efforts in the Pacific Palisades, which will consist of restoring and upgrading the power distribution system that was destroyed or damaged by the Palisades Fire. Up to one acre would be mowed and used for laydown, access roads, and trailer staging. Roads would require grading to improve access to the site. All areas utilized for staging would be covered with four to six inches of aggregate base. Locking shipping containers (Conex) would be set up onsite to store wire, cable and insulators used for power distribution restoration efforts. The laydown area would also be used to store underground prefabricated concrete structures and electric conduits necessary for restoration efforts. The proposed project area would be

enclosed with approximately 1,600 linear feet of fencing. No nighttime lighting, portable toilets, restrooms, or utility hookups are proposed.

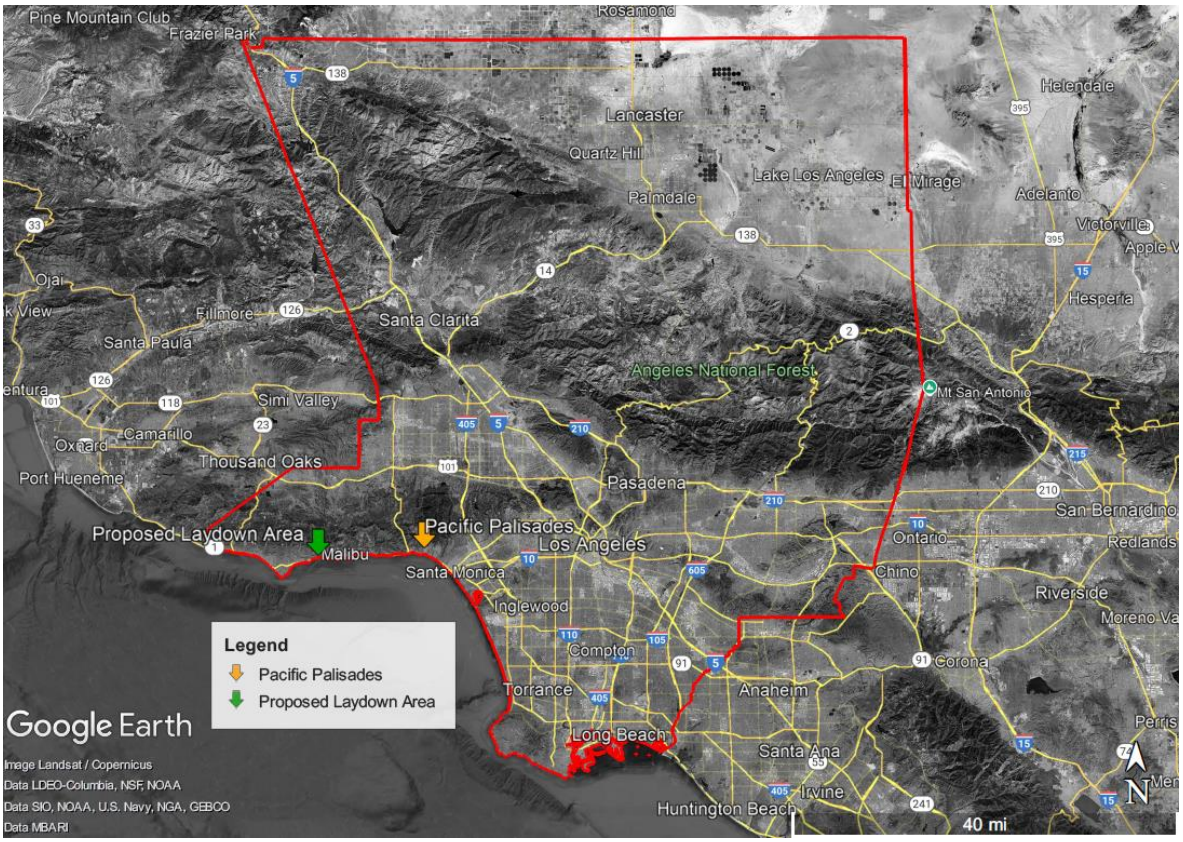


Figure 1. Regional Map



Figure 2. Laydown and Entrance

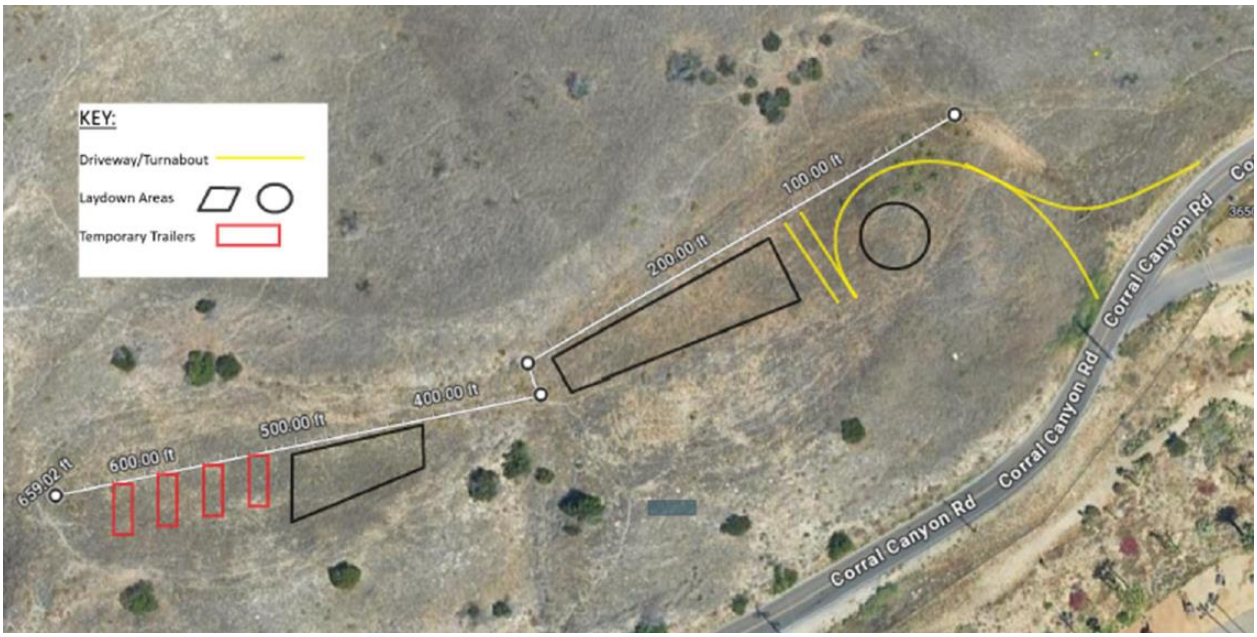


Figure 3. Proposed Laydown Areas

1.4 Methods

Special-status species and habitats that have the potential to occur in the project area were identified through a review of natural resource databases and habitat assessment.

1.4.1 Literature Review and Records Searches

The following natural resource databases, management agency websites, and biological reports were used to identify special-status species and habitats:

- California Department of Fish and Wildlife (CDFW)'s California Natural Diversity Database (CNDDB; CDFW 2025);
- California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CIRP; CNPS 2025);
- U.S. Fish and Wildlife Service (USFWS)'s Information for Planning and Consultation (IPaC) (USFWS 2025a);
- USFWS Environmental Conservation Online System Critical Habitat Mapper (USFWS 2025b);
- USFWS National Wetlands Inventory (USFWS 2025c); and
- U.S. Department of Agriculture/Natural Resources Conservation Service (USDA) Web Soil Survey (USDA 2025).
- Coastal Zone Boundary Map for Los Angeles (2025)
- Significant Ecological Areas Map for County of Los Angeles (2025)

1.4.2 Habitat Assessment

LADWP Environmental Planning and Assessment Staff surveyed the project area on May 26, 2025, to conduct a wildlife surveys, botanical surveys and a habitat assessment. A follow up late season survey was conducted on July 11, 2025. The

survey was conducted midday with temperatures ranging between 62–66 degrees Fahrenheit, winds from 2–4 miles per hour, and skies overcast. Vegetation communities occurring within the project site were documented and classified in accordance with the vegetation descriptions provided in *A Manual of California Vegetation* (Sawyer *et al*., 2009). In addition, site characteristics such as soil condition, topography, hydrology, anthropogenic disturbances, indicator species, condition of on-site vegetation communities, and the presence of potentially regulated jurisdictional features were noted. The field survey was confined to the project site boundaries with a 50-foot buffer considered.

All plant and wildlife species observed, as well as dominant plant species within each vegetation community, were recorded in a field notebook. Plant species observed during the field survey were identified by visual characteristics and morphology in the field, and less familiar plant species were photographed and later identified using taxonomic guides. Plant nomenclature used in this report follows the Jepson Flora Project (2025), and scientific names are provided immediately following common names of plant species (first reference only). Wildlife identifications were made through aural and visual observation, as well as detection of signs, including scat, trails, tracks, burrows, and nests.

1.4.3. Jurisdictional Resources

Aerial imagery and the U.S. Fish and Wildlife Service's National Wetlands Inventory (USFWS 2025b) were used to conduct a desktop analysis and identify areas where operation and maintenance activities may impact jurisdictional vegetation and/or waters of the State. The area was evaluated on site on May 26, 2025 and July 11, 2025 to determine if jurisdictional vegetation and/or Waters of the State were present.

2.0 Results

2.1 Existing Conditions

The property is located in the City of Malibu, Los Angeles County, California, in the Santa Monica Mountains Significant Ecological Area. The proposed laydown site is less than one acre in area, located 12 miles east of the eastern extent of LADWP's service territory in the Pacific Palisades (Figure 1). The project area has a Mediterranean climate that is characterized by warm, dry summers and mild, wet winters. The project site is located at an elevation of approximately 180 to 200 feet above mean sea level, sloping moderately downward from north to south. According to the Custom Soil Resource Report for Los Angeles County, California, Southeastern Part (USDA 2025), the project site is underlain by the Calcic Argixerolls, 30 to 75 percent slopes (540) soil unit. Based on historic imagery, the site has not been previously developed, and fires have occurred in the area with a frequency of every 8–10 years. Aerial imagery reviewed for this study shows that this site has been disked on a nearly annual basis within the Project area.

2.2 Vegetation Communities and Land Cover Types

The vegetation community in the project area is dominated by invasive species including carnation spurge (*Euphorbia terracina*), yellow starthistle (*Centaurea solstitialis),* black mustard (*Brassica nigra)*, brome grasses (*Bromus* spp.), yellow

sweetclover (*Melilotus indicus*), and slender wild oat (*Avena barbata).* This site can be characterized as *Brassica nigra – Centaurea (solstitialis, melitensis*) Herbaceous Semi-Natural Alliance, consisting of upland ruderal forbs as dominant in the herbaceous layer, and trees and shrubs may be present at low cover. Membership rules of this alliance indicate that *Euphorbia terracina* or *Cynara cardunculus* > 50% relative cover in the herbaceous layer with other non-natives, including *Brassica nigra* and *Bromus diandrus* (Buck-Diaz and Evens 2015). Non-native plants such as castor bean (*Ricinus communis*), shortpod mustard (*Hirschfeldia incana*), fennel (*Foeniculum vulgare*), bristly oxtongue (*Silene gallica*), fountain grass *(Cenchrus setaceus),* and ribwort plantain *(Plantago lanceolata*) were also documented on site.

Native annuals and perennials found in the project area included narrowleaf milkweed (*Asclepias fascicularis*), common cudweed (*Pseudognaphalium californicum),* Santa Barbara milk vetch (*Astragalus trichopodus),* laurel sumac (*Malosma laurina*), coyote brush *(Baccharis pilularis),* California brittlebush *(Encelia californica),* California sagebrush *(Artemisia californica),* ashyleaf buckwheat *(Eriogonum cinereum),* and coastal goldenbush *(Isocoma menziesii).* No trees (native or non-native) were present on site, though blue elderberry (*Sambucus mexicana)* was observed nearby. Photographs 10–12 depict the types of vegetation occurring on the site.

2.3 Wildlife

Due to the undeveloped nature of the property, the significant open space surrounding the property, and its close vicinity to waterways and waterbodies, habitat within the project site is suitable for supporting wildlife species, though the prevalence of invasive species provides limited habitat and forage. The site is undeveloped, overgrown with invasive species with sporadic shrubs and native species. A total of thirteen (13) wildlife species were detected during the field survey, all of which were birds. Species detected included bushtit (*Psaltriparus minimus*), house finch (*Haemorhous mexicanus*), song sparrow (*Melospiza melodia*), northern house wren (*Troglodytes aedon*), California scrub jay (*Aphelocoma californica*), lazuli bunting *(Passerina amoena*), red-winged blackbird (*Agelaius phoeniceus)*, rufous-crowned Sparrow (*Aimophila ruficeps*), lesser goldfinch (*Spinus psaltria*), common yellowthroat (*Geothlypis trichas*), California towhee (*Melozone crissalis*), American goldfinch (*Spinus tristis*), and wrentit *(Chamaea fasciata*).

2.4 Jurisdictional Resources

The National Wetlands Inventory Wetlands Mapper documented riverine habitat (R4SBA) traveling through the center of the site for a span of approximately 50 feet (Figure 4). During the field survey conducted on May 26, 2025, a surveyor located the area of the mapped resources and documented a lack of features on site. Within the area where the feature is mapped, no characteristics were detected that indicate this area supports significant hydrology (i.e., permanent, intermittent, or relatively permanent waters), and no hydric soils were identified. The area lacked evidence of flow features or concavity. No hydric vegetation was detected within the mapped area, and the vegetation composition was consistent with the surrounding area and classified as “Upland.” Aerial imagery reviewed for this study shows that this area has been disked on a nearly annual basis within the Project area. Therefore, although this site was

historically mapped as riverine, the field survey verified that the area is not a water feature and therefore not jurisdictional.

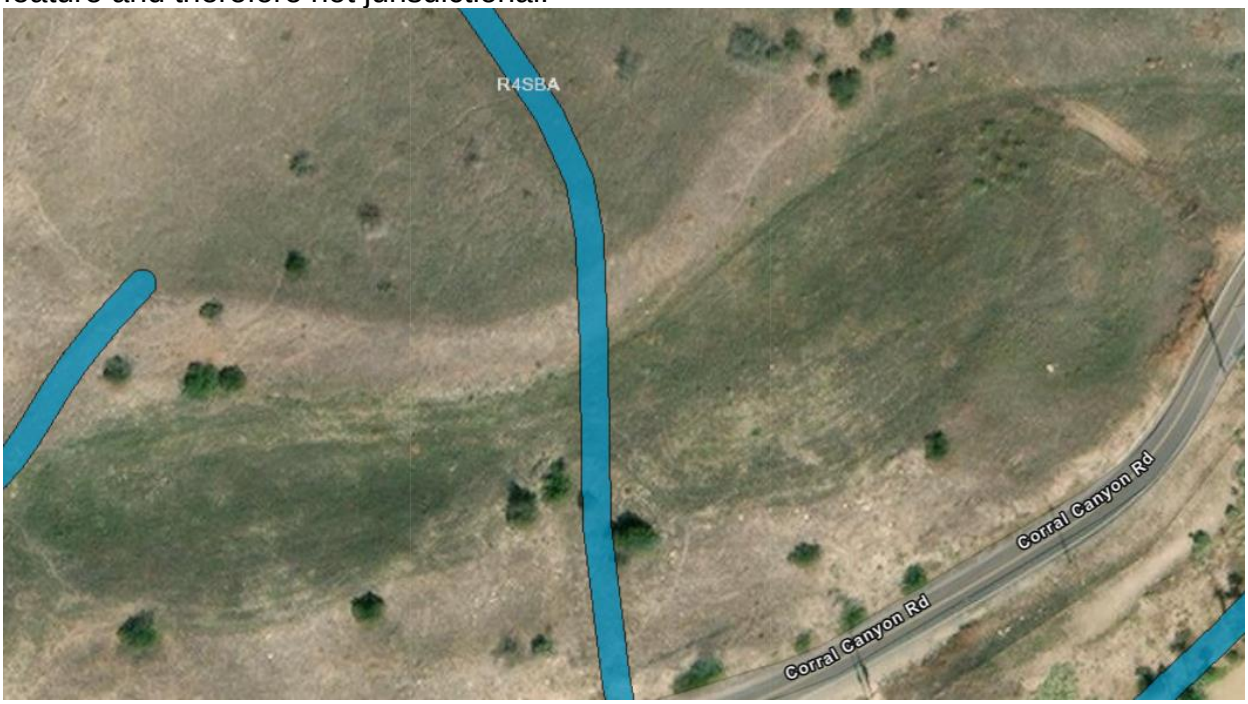
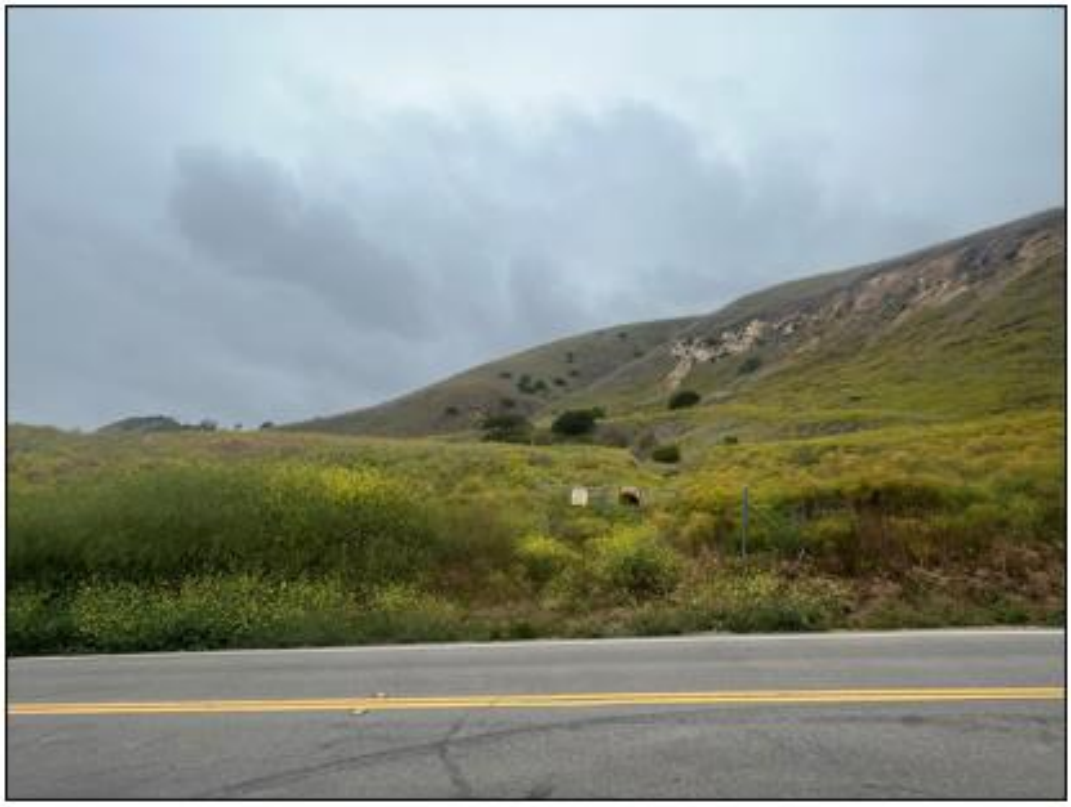


Figure 4. National Wetlands Inventory Map of Riverine Feature Crossing Project area



Photograph 1. Site entrance off of Corral Canyon Road facing northwest.



Photograph 2. View of entrance gate from inside the property facing southeast.



Photograph 3. Corral Canyon Road adjacent to site facing south.



Photograph 4. Corral Canyon Road adjacent to site facing north.



Photograph 5. Entrance access road overgrown with vegetation.



Photograph 6. Property site facing east (Corral Canyon Road in distance); Prevalent Carnation Spurge.



Photograph 7. Hills north of the proposed laydown site.



Photograph 8. Property span facing south.



Photograph 9. Property span facing west.



Photograph 10. Drop off on southern boundary of the property facing the ocean; Narrowleaf Milkweed in the foreground.



Photograph 11. Sparse native vegetation including California Sagebrush, Coyotebrush, and Laurel Sumac; remaining space dominated by invasives.



Photograph 12. Cluster of onsite Narrowleaf Milkweed.

3.0 Special Status Biological Constraints

The following section identifies various types of biological constraints known to be present in the region and discusses the likelihood of encountering these species on the project site. This section is based on a literature review conducted of the CNDDB (CDFW 2025), CRPI (CNPS 2025), IPaC (USFWS 2025a), and Critical Habitat Mapper (USFWS 2025b) within the USGS *Point Dume, Malibu Beach, Topanga, Calabasas, Thousand Oaks, and Canoga Park, California* 7.5-minute quadrangles.

Table 1. Impact Analysis for Special Status Species in the General Area[1]

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Birds				
Accipiter cooperi	Cooper's hawk	CDFW_WL	Cismontane woodland, riparian forest, riparian woodland, upper montane coniferous forest.	**Low**. Suitable habitat for nesting does not occur on site; however, this species may use the site for foraging.
Agelaius tricolor	Tricolored blackbird	ST	Inhabits annual grasslands, wet and dry vernal pools, seasonal wetlands. Frequently found in and around agricultural areas.	**Not expected**. Suitable habitat does not occur on site.
Aimophila ruficeps canescens	Southern California rufous-crowned sparrow	CDFW_WL	Chaparral, coastal scrub.	**Low**. Minimal suitable habitat occurs on site, due to consistent mowing, there are minimal shrubs available for nesting; the closest regional occurrence of this species is 7 miles away and 13 years old.
Aquila chrysaetos	Golden eagle	BLM_S, CDFW_WL CDFW_FP	Broad leaved upland forest, Cismontane woodland, Coastal prairie, Great Basin grassland, Great Basin scrub, Lower montane coniferous forest, Pinon & juniper woodlands, Upper montane coniferous forest, Valley & foothill grassland	**Low**. Suitable habitat for nesting does not occur on site. While not detected during surveys, this species could forage on the site.
Athene cunicularia	Burrowing owl	SC	Occurs in expansive, nearly flat open areas, such as prairies, grasslands, agricultural fields, vacant lots. Burrows or similar structures are required for roosting/nesting.	**Not expected**. Suitable habitat does not occur on site, no burrows or burrow surrogates were detected on the site.
Brachyramphus marmoratus	Marbled murrelet	FT	Marbled Murrelets are sea birds that live along the Pacific Coast from central California to Alaska and nest in old growth forests.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Buteo swainsoni	Swainson's hawk	ST	Nests in stands with few trees in juniper-sage flats and riparian areas. Utilizes adjacent grasslands, grain or alfalfa fields, or livestock pastures for foraging.	**Not expected**. Suitable habitat does not occur on site.
Charadrius nivosus nivosus	Western snowy plover	FT	Inhabits coastal beaches, coastal dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. Less common habitat includes dredged material disposal sites, salt pond levees, dry salt ponds, and river bars	**Not expected**. Suitable habitat does not occur on site.
Coccyzus americanus	Yellow-billed cuckoo	FT	Requires dense wooded habitat with water nearby.	**Not expected**. Suitable habitat does not occur on site.
Empidonax traillii extimus	Southwestern willow flycatcher	FE	Requires thick, contiguous stands of willows.	**Not expected**. Suitable habitat does not occur on site.
Falco peregrinus anatum	American peregrine falcon	CNDDB, FD, SD, FP	Nests on high cliffs, generally near water bodies; feed on birds (esp. shorebirds & waterfowl); widespread but rare worldwide.	**Moderate.** Suitable habitat for nesting does not occur on site; however, due to numerous occurrences nearby, including one occurrence located less than a mile from the site, this species is highly likely to forage or fly over the site.
Gymnoyps californianus	California condor	FE	Foraging habitat includes open grasslands, oak savanna foothills, and beaches adjacent to coastal mountains. Condors roost on large trees or snags, or on rocky outcrops and cliffs. Nests are located in caves and ledges of steep rocky terrain or in cavities and broken tops of old growth conifers created by fire or wind.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Polioptila californica californica	Coastal California gnatcatcher	FT	Obligate, permanent resident of coastal sage scrub below 2,500 feet (760 meters) in southern California. Inhabits low, coastal sage scrub in arid washes, on mesas and slopes.	**Low.** Although marginal suitable habitat occurs on site, the site is cleared of vegetation regularly, and the closest regional occurrence of this species is 10 miles away and 23 years old.
Riparia riparia	Bank swallow	ST	Found in riparian and other lowland habitats during spring and fall. Occupy riparian, lacustrine, and coastal areas with vertical banks, bluffs, and cliffs with fine-textured or sandy soils during summer, where they dig nesting holes.	**Not expected**. Suitable habitat for nesting does not occur on site as sandy soils for burrowing are not present.
Sternula antillarum browni	California least tern	FE	During summer, breed along marine and estuarine shores and feed in nearby shallow, estuarine waters. After breeding, found at lacustrine waters near coast.	**Not expected**. Suitable habitat does not occur on site.
Vireo bellii pusillus	Least bell's vireo	FE; CE	Occupies willow and cottonwood riparian woodland, usually associated with water or adjacent to a water source.	**Not expected**. Suitable habitat does not occur on site.
Fishes				
Eucyclogobius newberryi	Tidewater goby	FE	Occurs in coastal lagoons and estuaries in California.	**Not expected**. Suitable habitat does not occur on site.
Gila orcutti	Arroyo chub	CNDDB	Los Angeles Basin southern coastal streams; slow water stream sections with mud or sand bottoms; feeds heavily on aquatic vegetation and associated invertebrates.	**Not expected**. Suitable habitat does not occur on site.
Oncorhynchus mykiss irideus pop. 10	Steelhead trout – southern California DPS	FE; SC	Found in Pacific Ocean tributaries from Aleutian Islands in Alaska south to Southern California. Anadromous forms are known as steelhead, freshwater forms as rainbow trout.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Mammals				
Antrozous pallidus	Pallid bat	BLM_S;SSC	Roosts by day in rock crevices, buildings, mines, and hollow trees. At night, may roost under bridges and/or porches.	**Low**. Suitable habitat for nesting does not occur on site but may be present nearby. There is minimal potential for foraging on site.
Euderma maculatum	Spotted bat	BLM_S; SSC	Habitats include forest openings, piñon-juniper woodlands, riverine/riparian habitats, canyons, wetlands, meadows, and old agricultural fields. They are particularly associated with rock-faced cliffs, where they prefer to roost in crevices.	**Low**. Suitable habitat for nesting does not occur on site. There is minimal potential for foraging on site.
Eumops perotis californicus	Western mastiff bat	BLM_S; SSC	Roosts in rock crevices, on cliff faces and also uses crevices in buildings and structures. Limited to roosts that allow at least 10 feet of free fall.	**Low**. Suitable habitat for nesting does not occur on site. There is minimal potential for foraging on site.
Lasiurus cinereus	Hoary bat	CNDDB	Occurs from sea level to 13,200 feet (4,125 meters). Males generally inhabit foothills, deserts, and mountains, while females inhabit lowlands and coastal valleys. Roosts in dense foliage of medium-large trees, preferring sites hidden from above with few branches below.	**Low**. Suitable habitat for nesting does not occur on site. There is minimal potential for foraging on site.
Lasiurus frantzii	Western red bat	SSC	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests.	**Low**. Suitable habitat for nesting does not occur on site. There is minimal potential for foraging on site.
Macrotus californicus	California leaf-nosed bat	BLM_S; SSC	Inhabits desert riparian, desert wash, desert succulent shrub, alkali desert scrub, and palm oasis habitats.	**Not expected**. Suitable habitat does not occur on site.
Myotis ciliolabrum	Western small-footed myotis	BLM_S	Wide range of habitats mostly arid wooded and brushy uplands near water. Seeks cover in caves, buildings, mines, and crevices.	**Low**. Suitable habitat for nesting does not occur on site. There is minimal potential for foraging on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Myotis yumanensis	Yuma myotis	BLM_S	Optimal habitats are open forests and woodlands with sources of water over which to feed.	**Low**. Suitable habitat for nesting does not occur on site; however, this species may fly over the site to access open ocean water for foraging.
Neotoma lepida intermedia	San Diego desert woodrat	SSC	Coastal scrub of Southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs, and slopes.	**Moderate**. Marginal habitat is present on site due to routine vegetation maintenance; however, an occurrence is present within 2 miles (at Pepperdine University), and therefore this species has Moderate potential to encroach the Project area.
Taxidea taxus	American badger	SSC	Occurs in dry, open stages of shrub, forest, and herbaceous habitats. Prefers areas with fine-textured or sandy soils for digging burrows.	**Not expected.** Suitable habitat does not occur on site.
Reptiles				
Actinemys pallida	Southwestern pond turtle	PFT	Inhabits permanent or nearly permanent bodies of water in various habitat types; requires basking sites such as partially submerged logs, vegetation mats, or open mud banks.	**Not expected**. Suitable habitat does not occur on site.
Anniella spp.	California legless lizard	SSC	Prefers moist, warm, loose soils in sparsely vegetated areas of coastal dune, valley-foothill, chaparral, and coastal scrub habitats. May be found in upland areas, often under leaf litter or other surface objects.	**Moderate.** Although sandy soils do not occur on the project site, this species can use small mammal burrows and adjacent vegetation for cover. Potentially suitable habitat occurs on site.
Anniella stebbinsi	Southern California legless lizard	SSC; USFS_S	Prefers moist, warm, loose soils in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores,	**Moderate.** Although sandy soil does not occur on the project site, this species can use small mammal burrows and nearby dense vegetation for cover. Potentially

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
			cottonwoods, or oaks. May be found in upland areas, often under leaf litter or other surface objects.	suitable habitat occurs on site, the closest regional occurrence of this species is 3.8 miles away and 7 years old.
Aspidoscelis tigris stejnegeri	Coastal whiptail	SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas.	**High.** Suitable habitat is present.
Diadophis punctatus modestus	San Bernardino ringneck snake	USFS_S	Found in open, rocky areas in valley-foothill, mixed chaparral, and annual grassland habitats; generally found near streams in mesic habitats.	**Not expected**. Suitable habitat does not occur on site.
Phrynosoma blainvillii	Coast horned lizard	BLM_S; SSC	Wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	**Moderate**. Potentially suitable habitat occurs on site, the closest regional occurrence of this species is 2.5 miles away and 26 years old.
Thamnophis hammondii	Two-striped gartersnake	BLM_S; SSC	Highly aquatic; prefers to be in or near permanent fresh water; often along streams with rocky beds and riparian growth. May occur in uplands during winter.	**Low**. Species known to use upland areas away from drainages during the winter. Suitable aquatic habitat does not occur on site.
Thamnophis sirtalis pop. 1	South coast gartersnake	SSC	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.	**Not expected**. Suitable habitat does not occur on site.
Amphibians				
Anaxyrus californicus	Arroyo toad	FE, SSC	Inhabits valley-foothill, desert riparian, desert wash, palm oasis, Joshua tree, mixed chaparral, and sagebrush habitats. Often found near washes or intermittent streams.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Rana draytonii	California red-legged frog	FT	Prefers deep pools with dense stands of willow or cattail for breeding.	**Not expected**. Suitable habitat does not occur on site.
Spea hammondii	Western spadefoot	PFT	Inhabits grassland, oak woodland, coastal sage scrub, and chaparral vegetation in washes, floodplains, alluvial fans, playas, and alkali flats.	**Not expected**. Suitable habitat does not occur on site.
Invertebrates				
Aglaothoraz longipennis	Santa Monica Shieldback katydid	CNDDB	Chaparral.	**Moderate**. Chaparral plants are present immediately adjacent to the site that may support this species, and the nearest occurrence is less than 2 miles away at the entrance of Big Rock Canyon.
Atractelmis Wawona	Wawona riffle beetle	CNDDB	Aquatic.	**Not expected**. Suitable habitat does not occur on site.
Bombus crotchii	Crotch's bumble bee	SC	Coastal California to Sierra-Cascade crest, and to Mexico. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*.	**High.** Potential food plants are present on site. Recent occurrence was mapped within a mile of Project area.
Bombus pensylvanicus	American bumble bee	CNDDB	Coastal prairie, Great Basin grassland, Valley & foothill grassland	**High**. Suitable habitat is present on site, and an occurrence is less than 3 miles from the Project area.
Branchinecta lynchi	Vernal pool shrimp	FE	Vernal pools	**Not expected**. Suitable habitat does not occur on site.
Cicindela hirticollis gravida	Sandy beach tiger beetle	CNDDB	Burrow in moist sand in coastal habitats, including sand dunes and beaches	**Not expected**. Suitable habitat does not occur on site.
Coelus globosus	Globose dune beetle	CNDDB	Found in coastal dune habitats.	**Not expected**. Suitable habitat does not occur on site.
Danaus plexippus	Monarch butterfly	PFT	Roost in eucalyptus (*Eucalyptus* sp.), Monterey cypress (*Hesperocyparis macrocarpa*), and Monterey pines	**High**. Milkweed (host plant) occurs on site, and occurrences are mapped within a mile of the Project area.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
			(*Pinus radiata*). Requires milkweed (*Asclepias* sp.) to breed.	
Eugnosta busckana	Busck's gallmoth	CNDDB	Inhabits sand dunes habitats. Requires California brittlebush (*Encelia californica*) as larval food source.	**Not expected**. Suitable habitat does not occur on site.
Euphydryas editha quino	Quino checkerspot butterfly	FE	Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties.	**Not expected.** Species considered extirpated in Los Angeles County. Host plants were not detected at the Project area.
Gonidea angulata	Western ridged mussel	CNDDB	Aquatic.	**Not expected**. Suitable habitat does not occur on site.
Socalchemmis gertschi	Gertsch's socalchemmis spider	CNDDB	Known from only 2 localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon. Coastal scrub.	**Not expected**. Suitable habitat does not occur on site.
Streptocephalus woottoni	Riverside fairy shrimp	FE	Vernal pools.	**Not expected**. Suitable habitat does not occur on site.
Trimerotropis occidentiloides	Santa Monica grasshopper	CNDDB	Known only from the Santa Monica Mountains. Found on bare hillsides and along dirt trails in chaparral.	**Low**. Marginal habitat is present in areas of the site and adjacent where barren hillsides are present.
Plants				
Arenaria paludicola	Marsh sandwort	FE; SE	Sandy openings in freshwater or brackish marsh and swamp habitats, between 10–560 feet	**Not expected**. Suitable habitat does not occur on site.
Astragalus brauntonii	Braunton's Milk-vetch	FE; 1B.1	Recently burned or disturbed areas in chaparral, coastal scrub, and valley and foothill grassland habitats between 13–2,100 feet.	**Not expected.** Although potentially suitable habitat occurs on site, the site is routinely cleared and this species is not expected to establish, and this species was not observed during surveys. The closest recent occurrence is 3 miles away.
Astragalus pycnostachyus var. lanosissimus	Ventura Marsh milk-vetch	FE; SE; 1B.1	Found in coastal dune, coastal scrub, and coastal salt or brackish marsh and swamp habitats between 3–115 feet.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Astragalus tener var. titi	Coastal dunes milk-vetch	FE; SE; 1B.1	Found in vernally mesic areas in coastal bluff scrub, coastal dune, and coastal prairie habitats between 3–165 feet.	**Not expected**. Suitable habitat does not occur on site.
Atriplex coulteri	Coulter's saltbush	1B.2	Found in alkaline or clay soils in coastal bluff scrub, coastal dune, coastal scrub, and valley and foothill grassland habitats. Occurs between 10–1,510 feet.	**Not expected**. Suitable habitat does not occur on site.
Atriplex pacifica	South coast saltscale	1B.2	Alkali sink, coastal sage scrub, wetland-riparian playas and coastal habitats. Occurs between 0–460 feet.	**Not expected**. Suitable habitat does not occur on site.
Atriplex parishii	Parish's brittlescale	1B.1	Found in alkaline habitats, including chenopod scrub, playas, and vernal pools. Occurs between 80–6,235 feet.	**Not expected**. Suitable habitat does not occur on site.
Atriplex serenana var. davidsonii	Davidson's saltscale	1B.2	Found in alkaline habitats, including coastal scrub and coastal bluff scrub. Occurs between 35–655 feet.	**Not expected**. Suitable habitat does not occur on site.
Baccharis malibuensis	Malibu baccharis	1B.1	Chaparral, cismontane woodland, coastal scrub, and riparian woodland. Occurs between 500–1,000 feet.	**Moderate.** Site is outside of elevation range, but one occurrence was mapped <1,000 feet away 25 years ago. Since suitable habitat and a known occurrence are very close to the site, it is possible that this species could encroach and establish at the margins of the site despite routine clearing of vegetation.
Baccharis plummerae ssp. *plummerae*	Plummer's baccharis	4.3	Broadleaved upland forest, chaparral, cismontane woodland, coastal scrub, in rocky areas. Occurs between 15–1,395 feet.	**Not expected**. Suitable habitat does not occur on site.
Berberis nevinii	Nevin's barberry	FE	Found in sandy or gravelly soils in chaparral, cismontane woodland,	**Not expected**. The closest mapped occurrence is 25 miles east. The site

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
			coastal scrub, and riparian scrub habitats, between 13–2,100 feet.	appears to be out of the known geographic range of this species.
Calandrinia breweri	Brewer's calandrinia	4.2	Chaparral and coastal scrub, in burned or disturbed areas, and on loam substrates, between 35–4,005 feet.	**High.** This species has been observed less than one mile away in Solstice Canyon.
Calochortus clavatus var. *clavatus*	Club-haired mariposa lily	4.3	Chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland, usually on clay/serpentine soils on rocky soils. Occurs between 100–4,265 feet.	**Not expected**. Suitable habitat does not occur on site.
Calochortus clavatus var. gracilis	Slender mariposa-lily	1B.2	Found in chaparral, coastal scrub, and valley and foothill grassland habitats. Occurs between 1,045–3,285 feet	**Not expected.** Outside of elevation range.
Calochortus plummerae	Plummer's mariposa-lily	4.2	Prefers granitic or rocky areas. Found in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grassland habitats. Occurs between 330–5,580 feet.	**Not expected.** Outside of elevation range.
Camissoniopsis lewisii	Lewis' evening-primrose	3	Cismontane woodland, Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland. Sometimes occurs in clay and sandy substrates. Occurs between 0–985 feet.	**Not expected**. Suitable habitat does not occur on site.
Cercocarpus betuloides var. *blancheae*	Island mountain-mahogany	4.3	Chaparral, Closed-cone coniferous forest. Occurs between 100–1,970 feet.	**Not expected**. Suitable habitat does not occur on site.
Chloropyron maritimum ssp. maritimum	Salt marsh bird's-beak	FE; SE; 1B.2	Found in coastal dunes and coastal salt marshes and swamps. Occurs between 0–98 feet.	**Not expected**. Suitable habitat does not occur on site.
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	SE; 1B.1	Preferred habitat includes sandy coastal scrub, valley and foothill grasslands. Occurs between 495–4,000 feet	**Not expected.** Outside of elevation range.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Chorizanthe parryi var. parryi	Parry's spineflower	1B.1	Found in sandy or rocky soils in chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland habitats. Occurs between 902–4002 feet.	**Not expected.** Outside of elevation range.
Convolvulus simulans	Small-flowered morning-glory	4.2	Chaparral (openings), coastal scrub, valley and foothill grassland, generally on clay, seeps, and/or serpentine substrates. Occurs between 100–2,430 feet.	**Not expected**. Suitable habitat does not occur on site.
Deinandra minthornii	Santa Susana tarplant	SR; 1B.2	Found in rocky areas in chaparral and coastal scrub habitats. Occurs between 918–2,493 feet.	**Not expected.** Outside of elevation range.
Delphinium parryi ssp. blochmaniae	Dune larkspur	1B.2; BLM_S	Occurs on rocky areas and dunes in coastal dune and maritime chaparral at elevations ranging from 0–650 feet.	**Not expected**. Suitable habitat does not occur on site.
Delphinium parryi ssp. *purpureum*	Mt. Pinos larkspur	4.3	Chaparral, Mojavean desert scrub, and pinyon and juniper woodland. Occurs between 3,280–8,530 feet.	**Not expected.** Outside of elevation range.
Dichondra occidentalis	Western dichondra	4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, between 165–1,640 feet.	**Low**. Marginal suitable habitat is present; however, this species typically occurs in less disturbed (more pristine) areas, and the nearest occurrence is well over 5 miles away from the Project area.
Dithyrea maritima	Beach spectaclepod	ST; 1B.1; BLM_S	Found in coastal dune and sandy coastal scrub habitats. Occurs between 9–164 feet	**Not expected**. Suitable habitat does not occur on site.
Dudleya blochmaniae ssp. blochmaniae	Blochman's dudleya	1B.1; BLM_S	Prefers clay or serpentine soils in coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland habitats. Occurs between 16–1,476 feet.	**Not expected**. Although potentially suitable vegetation occurs on the site, the site is subject to vegetation clearing that would prevent this species from establishing, and the closest regional occurrence of this

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
				species is 2.5 miles away and 70 years old.
Dudleya cymosa ssp. agourensis	Agoura Hills dudleya	FT; 1B.2	Rocky, volcanic substrates in chaparral and cismontane woodlands. Occurs between 660–1,649 feet.	**Not expected**. Suitable habitat does not occur on site and outside of elevation range.
Dudleya cymosa ssp. marcescens	Marcescent dudleya	FT; SR; 1B.2	Volcanic or rocky soils in chaparral. Occurs between 495–1,700 feet.	**Not expected**. Suitable habitat does not occur on site and outside of elevation range.
Dudleya cymosa ssp. ovatifolia	Santa monica mountains dudleya	FT; 1B.1	Volcanic or sedimentary, rocky soils in chaparral and coastal scrub. Occurs between 495–5,525 feet.	**Not expected**. Suitable habitat does not occur on site and outside of elevation range.
Dudleya multicaulis	Many-stemmed dudleya	1B.2	Found in chaparral, coastal scrub, and valley and foothill grassland habitats. Often in clay soils. Occurs between 50–2,520 feet	**Not expected**. Although potentially suitable habitat occurs on site, the site is subject to regular vegetation clearing that would prevent this species from establishing, and the only record of occurrence is 15 miles away and 47 years old.
Dudleya parva	Conejo dudleya	FT; 1B.2	Western end of Simi Hills, north-facing cliffs and adjacent grasslands.	**Not expected**. Suitable habitat does not occur on site.
Eriogonum crocatum	Conejo buckwheat	SR; 1B.2	Chaparral, coastal scrub, and valley and foothill grassland, growing at elevations from 164–1,903 feet.	**Not expected**. Outside of elevation range
Horkelia cuneata var. puberula	Mesa horkelia	1B.1	Prefers sandy or gravelly sites in chaparral, cismontane woodland, and coastal scrub habitats. Occurs between 230–2,660 feet.	**Not expected.** Outside of elevation range.
Isocoma menziesii var. decumbens	Decumbent goldenbush	1B.2	Prefers chaparral and coastal scrub (sandy, often in disturbed areas). Occurs between 30–450 feet.	**Not expected**. Although potentially suitable habitat occurs on site, the site is routinely cleared of vegetation preventing the establishment of this species, and this perennial plant was not detected during the site survey. The only nearby record of

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
				occurrence is 4 miles away and 50 years old.
Juglans californica	Southern California black walnut	4.2	Chaparral, cismontane woodland, coastal scrub, riparian woodland, between 165–2,955 feet.	**Not expected**. Marginal suitable habitat exists, this plant is not expected to establish due to routine vegetation clearing and was not observed on the site.
Juncus acutus ssp*. leopoldii*	Southwestern spiny rush	1B.1	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt), meadows and seeps (alkaline seeps), between 10–2,955 feet.	**Not expected**. Suitable habitat does not occur on site.
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	1B.1	Found in coastal salt marshes and swamps, playas, and vernal pools. Occurs between 3–4,005 feet	**Not expected**. Suitable habitat does not occur on site.
Lepechinia fragrans	Fragrant pitcher sage	4.2	Chaparral, between 65–4,300 feet.	**Not expected.** Marginal suitable habitat exists, this plant is not expected to establish due to routine vegetation clearing and was not observed on the site.
Lilium humboldtii ssp*. humboldtii*	Humboldt lily	4.2	Chaparral, cismontane woodland, and lower montane coniferous forest, generally in openings. Occurs between 295–4,200 feet.	**Not expected.** Outside of elevation range.
Lilium humboldtii ssp*. ocellatum*	Ocellated Humboldt lily	4.2	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and riparian woodland, generally in openings. Occurs between 100–5,905 feet.	**Not expected.** This species requires more mesic environments than the site provides.
Monardella hypoleuca ssp. hypoleuca	White-veined monardella	1B.3	Found in chaparral and cismontane woodland habitats. Occurs between 164–5,003 feet	**Not expected.** Habitat does not occur on site and outside of elevation range.
Navarretia fossalis	Spreading navarretia	FT	Wetlands species. Freshwater-marsh and vernal pool habitat between 100–4265 feet.	**Not expected**. Suitable habitat does not occur on site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Navarretia ojaiensis	Ojai navarretia	1B.1	Prefers openings in chaparral and coastal scrub, valley and foothill grasslands. Occurs between 920–2,030 feet.	**Not expected.** Suitable habitat does not occur on site and outside of elevation range.
Nolina cismontana	Chaparral nolina	1B.2	Prefers sandstone or gabbro chaparral and coastal scrub. Occurs between 460–4,180 feet.	**Not expected.** Outside of elevation range.
Orcuttia californica	California orcutt grass	FE	Found in vernal pools. Occurs between 145–7,105 feet.	**Not expected**. Suitable habitat does not occur on site.
Pelazoneuron puberulum var. *sonorense*	Sonoran maiden fern	2B.2; USFS_S	Within meadows and seeps at elevations between 165–2,000 feet.	**Not expected.** Suitable habitat does not occur on site and outside of elevation range.
Pentachaeta lyonia	Lyon's pentachaeta	FE; SE; 1B.1	Found in coastal sage scrub, grassland, and chaparral openings in Ventura and Los Angeles County. Occurs between 0–1,312 feet.	**Low.** Potentially suitable habitat present; closest occurrence within one mile is 100 years old.
Quercus dumosa	Nuttall's scrub oak	1B.1	Prefers sandy or clay loam soils in closed-cone coniferous forest, chaparral, and coastal scrub habitats. Occurs between 49–1,312 feet.	**Not expected**. Although potentially suitable habitat occurs on site, the site is subject to vegetation clearing that would prevent this species from establishing at the site, and this species was not detected on the survey. The only record of occurrence is 8.6 miles away and 34 years old.
Rhinotropis cornuta var. *fishiae*	Fish's milkwort	4.3	Chaparral, cismontane woodland, and riparian woodland. Occurs between 330–3,280 feet.	**Not expected.** Outside of elevation range.
Romneya coulteri	Coulter's matilija poppy	4.2	Chaparral and coastal scrub, often in burned areas. Occurs between 65–3,935 feet.	**Not expected.** Marginal suitable habitat exists, this plant is not expected to establish due to routine vegetation clearing, and was not observed on the site.

Scientific Name[2]	Common name	Regulatory Status[3]	General Habitat Description[4]	Potential for Occurence[5,6]
Rorippa gambellii	Gambel's watercress	FE	Occurs within marshes and swamps at elevations from 16–1,082 feet.	**Not expected**. Suitable habitat does not occur on site.
Senecio aphanactis	Chaparral ragwort	1B.2	Occurs within chaparral, cismontane woodland, and coastal scrub, growing at elevations from 50–2,624 feet.	**Low**. Although potentially suitable habitat occurs on site, the only record of occurrence is 9 miles away and 47 years old.
Sidalcea neomexicana	Salt spring checkerbloom	2B.2	Prefers alkaline or mesic areas in chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playa habitats. Occurs between 45–5,020 feet	**Not expected.** suitable habitat exists on site but appears to lack alkaline or mesic areas.
Tortula californica	California screw moss	BLM_S	Occurs within chenopod scrub, and valley and foothill grassland, at elevations between 35–4,790 feet.	**Not expected**. Suitable habitat does not occur on site.

[1] Special-Status species known from the CNDDB and CNPS to occur on the Malibu Beach, Point Dume, Topanga, Calabasas, Canoga Park, and Thousand Oaks quadrangles.

[2] Nomenclature for special-status wildlife conforms to CNDDB.

[3] Sensitivity Status Codes

Federal
FT – Federally Threatened under Federal Endangered Species Act (FESA)
FE – Federally Endangered under FESA
FD – Federally Delisted under FESA
FPT – Proposed to be Federally threatened under FESA
USFS_S – U.S. Forest Service sensitive species
BLM_S – Bureau of Land Management sensitive species

State
ST – State Threatened under California Endangered Species Act (CESA)
SE – State Endangered under CESA
SR – State Rare under CESA
SC – State Candidate for listing under CESA
SD – State Delisted

Other **SSC** – Designated as a Species of Special Concern by California Fish & Wildlife (CDFW)
CDFW_WL – Designated as a Watch List species by CDFW
CNDDB - Tracked by CDFW in the California Natural Diversity Data Base or considered locally sensitive
CDFW_FP – State fully protected

[4] General Habitat Descriptions from CNDDB (CDFW 2025) and/or CNPS 2025.

[5] Historical occurrence data from CDFW (2025), unless otherwise noted.

[6] Potential for each species to occur within the BSA is based on the following guidelines:

- Present: Species was observed in or immediately adjacent to the BSA during the field survey, or survey conducted within the past five years.
- High: Habitat (including soils and elevation factors) and known historical range for the species occurs in the BSA and a known occurrence has been recorded from within five miles within the past 30 years.
- Moderate: Habitat for the species occurs in the BSA and a known occurrence exists from between five and ten miles of the BSA, within the past 30 years.
- Low: Limited habitat for the species occurs in the BSA and a known occurrence is from greater than 10 miles from the BSA or over 30 years old, or habitat to support the species is of marginal quantity or quality. A low potential to occur is also assigned when focused surveys for a species have been conducted numerous times within the past 10 years without positive results.
- Not Expected: Beyond those factors listed for Low Potential, the species is easily identifiable throughout the year and was not observed, or specific habitat requirements are not found within or adjacent to the BSA.

3.0 Findings

3.1 Special-Status Plants

Fifty-five (55) special-status plant species were identified in the project vicinity by reviews of the CNDDB, CIRP, and IPaC online databases (refer to Attachments A through C). However, no special-status plant species were detected during the field surveys. Of these 55 species, five (5) have a potential to occur within the Project area based on a review of specific habitat preferences, known occurrences and distributions, and elevation ranges. These include Malibu baccharis (Low potential), Brewer's calandrinia (High potential), Western dichondra (Low potential), Lyon's pentachaeta (Low potential), and chaparral ragwort (Low potential). Table 1 provides the habitat requirements, elevational ranges, and potential for occurrences of these and other species. Many plant species were determined to have no potential to occur due to the regular vegetation maintenance that occurs on the site, which prevents the establishment of many native species. The plant species that were determined to have some potential to occur have been reported in disturbed areas or in very close proximity to the site such that their potential to occur cannot be precluded and are discussed below.

Listed Threatened or Endangered Plants

This section describes plant species reported from the region that are listed as threatened or endangered under the federal ESA or CESA and that have some potential to be present at the Project area. Several listed plant species were identified during the literature review, but none of these species were found to have a potential to occur at the Project area other than Lyon's pentachaeta (*Pentachaeta lyonia*), discussed below.

> Lyon's pentachaeta (*Pentachaeta lyonia*). Lyon's petacheata is both federally and state listed as Endangered and is classified as CRPR 1B.1 by the CDFW. This species is typically found in coastal sage scrub, grassland, and chaparral openings in Ventura and Los Angeles County at 0–1,312 feet elevations. The nearest occurrence is a vague location in the area of Malibu Hills that is over 100 years old, but potentially extant per the CNDDB and additional occurrences of this species have been found nearby but have data obscured in iNaturalist. There is potential habitat for this species at the project site, but the likelihood of encountering this species is low, as the site receives regular vegetation clearing. This species was not located during species surveys.

Other Special-Status Plants

CDFW and CNPS identify plant species due to conservation concerns outside of the Federal ESA or CESA. CDFW compiles these species including CDFW and CNPS rankings as CRPR (California Rare Plant Rank) 1, 2, 3, or 4 in its compendium of "Special Plants" (CDFW 2025). These plants are treated here as "special-status species." Two high-priority special-status plants, Malibu baccharis (*Baccharis malibuensis*), and Chaparral ragwort (*Senecio aphanactis*) have some potential to be present and are discussed below.

Malibu baccharis (*Baccharis malibuensis*). The Malibu baccharis has been designated to have a CRPR of 1B.1. This species typically occurs in chaparral, cismontane woodland, coastal scrub, and riparian woodland at 500–1,000 feet. While the site is outside of the reported elevation range by CDFW/CNPS, there is one occurrence mapped less than 1,000 feet away from the Project area that was reported approximately 25 years ago. Since suitable habitat and a known occurrence are very close to the site, it is possible that this species could encroach and establish at the margins of the site despite routine vegetation clearing.

Chaparral ragwort (*Senecio aphanactis*). Chaparral ragwort is designated a 1B.2 CRPR by CNPS. This species typically occurs within chaparral, cismontane woodland, and coastal scrub, growing at elevations from 50–2,624 feet. Although potentially suitable habitat occurs on site, the only record of occurrence is 9 miles away and 47 years old. There is a Low probability of occurrence due to the site being potentially too disturbed by vegetation clearing to support this species.

California Rare Plant Rank (CRPR) 4 Species. Two CRPR 4 species (i.e., a "watch list," not indicating rarity) have potential to occur at the Project area, including Brewer's calandrinia (*Calandrinia breweri*, CRPR 4.2) and Western dichondra (*Dichondra occidentalis*, CRPR 4.2). All of these species are known to occur nearby, and the site possesses suitable habitat that could support them. However, due to the regular disturbances caused by vegetation clearing at the site, these species are unlikely to establish and have a low potential for occurrence.

3.1.1 Potential Impacts to Sensitive Plants.

The placement of rock and use of the site is not expected to result in direct or indirect impacts to special-status plants. Special status plants were not detected during the surveys and there is a low potential for their occurrence based on the historic and annual vegetation clearing of the site. It is possible that use of the site could result in temporary, indirect impacts to vegetation (and therefore special-status plant species) adjacent to the Project from dust. However, implementation of MM-BIO-1 would require a pre-work survey of grading and staging areas to delineate (with tape, fencing, etc.) the limits of disturbance for those activities, and to identify and mark any sensitive species to ensure avoidance. MM-BIO-4 would be implemented to avoid sensitive plants or facilitate transplanting for native species that are not federally or state-listed. With the implementation of these minimization measures, the construction of the proposed project would have a less than significant impact to special-status plant species. BMP-5, BMP-6, and BMP-7 would ensure that indirect impacts to special-status plants beyond the construction area are not significant.

Therefore, direct and indirect impacts to special-status plant species would not occur on the project site and have a low potential to occur on adjacent lands.

3.2 Special-Status Wildlife

There are approximately fifty-four (54) species of sensitive wildlife known from the region. These include 16 birds, three fishes, 10 mammals, eight reptiles, three amphibians, and 14 invertebrates. Special-status wildlife species were identified in the

project vicinity by reviews of the CNDDB and IPaC online databases (refer to Attachments A and C). 23 wildlife species have the potential to occur within the project area based on a review of specific habitat preferences, known occurrences and distributions, and elevation ranges. Wildlife groups with the potential to occur included birds (5), mammals (8), reptiles (5), and invertebrates (5). Sensitive amphibians or fish are not expected to occur on the site because suitable aquatic habitat is not present.

Birds are the most likely sensitive species to occur in the project region and include Cooper's hawk (Low Potential), Southern California rufous-crowned sparrow (Low Potential), Golden eagle (Low Potential), American peregrine falcon (Moderate Potential), and Coastal California gnatcatcher (Low Potential). Mammals include Pallid bat (Low Potential), Spotted bat (Low Potential), Western mastiff bat (Low Potential), Hoary bat (Low Potential), Western red bat (Low Potential), Western small-footed myotis (Low Potential), Yuma myotis (Low Potential), and San Diego desert woodrat (Moderate Potential).

Sensitive reptiles are known from the region and have a higher potential to occur near the project site (Table 1). These include Southern California legless lizard (Moderate Potential), California legless lizard (Moderate Potential), Coastal whiptail (High Potential), Coast horned lizard (High Potential) and Two-striped gartersnake (Low Potential). Sensitive invertebrates include Santa Monica Shieldback katydid (Moderate Potential), Crotch's bumble bee (High Potential), American bumble bee (High Potential), Monarch butterfly (High Potential), and Santa Monica grasshopper (*Trimerotropis occidentiloides*).

The special-status wildlife species identified during the habitat assessment have the potential to occur in the Project area within disturbed areas or within the undeveloped portions of the Santa Monica Mountains (i.e., associated with coastal sage scrub or chaparral habitat). Potential impacts to these species are discussed below.

Special-Status Birds

Golden Eagle *(Aquila chrysaetos).* The golden eagle is protected under the federal Bald and Golden Eagle Protection Act. Golden eagles are year-round residents throughout most of their range in the western United States. In the southwest, they are more common during winter when eagles that nest in Canada migrate south into the region. Golden eagles are wide-ranging predators, especially outside of the nesting season, when they do not need to return to tend eggs or young at their nests. Golden eagle foraging habitat consists of open terrain such as grasslands, deserts, savanna, and early successional forest and shrubland habitats throughout the regional foothills, mountains, and deserts. Suitable nesting habitat is absent from the Project area. Golden eagles were not observed during the survey but have been reported in the vicinity of the Project area and have a moderate potential to be present.

American peregrine falcon (*Falco peregrinus anatum*). Peregrine falcons were formerly listed under CESA and ESA but have been delisted under both acts. They are fully protected under the state Fish and Game Code. They are found regularly in the coastal region of southern California. They feed primarily on birds

captured during flight. Waterfowl and shorebirds make up a large proportion of their prey, and nest sites are often within foraging range of large water bodies. No American peregrine falcons were observed during the survey, but they have been reported numerous times in the vicinity of the Project area. Due to the number of nearby occurrences, the potential for occurrence is High for foraging or flying over the site.

Coastal California gnatcatcher (*Polioptila californica californica*). Coastal California gnatcatcher is listed as Threatened under the ESA and is a CDFW Species of Special Concern. The coastal California gnatcatcher is endemic to the coastal slopes of southern California, ranging from southern Ventura southward through Los Angeles, Orange, Riverside, San Bernardino, and San Diego counties, and into Baja California, Mexico. This species occurs in coastal sage scrub habitats and typically breeds only in areas with California sagebrush (*Artemisia californica*) plants present. The Project area provides poor nesting and foraging habitat for the coastal California gnatcatcher largely due to vegetation clearing and the limited establishment of perennial plants within the project footprint, although there are highly suitable habitats adjacent to the site. Although this species could occur nearby and encroach on the site for foraging, due to the limited habitat quality on site, there is a low potential for the coastal California gnatcatcher to occur within the Project area.

Other Special-status Birds

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) was the only “Watch List” wildlife species detected during the surveys of the Project area. Multiple eBird and iNaturalist records of Cooper’s hawk (*Accipiter cooperii*) are present within the Project area (eBird, 2025; iNaturalist, 2025). It is likely that Cooper’s hawks will be present in the future. Neither of these species are afforded specific protection under either state or federal regulations and both are very common in the Santa Monica Mountains.

Mammals

Pallid bat (*Antrozous pallidus*). Pallid bat is classified as a Species of Special Concern by CDFW. This range of this species is isolated to western North America from southern British Columbia in Canada, through the western United States, down to Central Mexico. This species roosts in natural spaces, such as rock crevices and hollow trees, but may also be found in urban structures, including buildings, mines, and openings in bridges. Since this species requires crevices, either natural or artificial, for nesting, natal colonies are not expected on the site. There is minimal potential for foraging on site and the potential for occurrence is low.

Spotted bat (*Euderma maculatum*). Spotted bat is classified as a Species of Special Concern by CDFW. This species ranges from southern British Columbia in Canada, through the western and central United States, and into northern and central Mexico; however the actual occurrences for this species are disjunct and largely scattered throughout western North America. The spotted bat's preferred habitats are quite varied, including openings within forests, piñon-juniper

woodlands, areas along rivers and streams, canyons, wetlands, meadows, and old agricultural fields. They have a strong preference for rock-faced cliffs, utilizing crevices for their roosts, and the site does not provide suitable nesting habitat. There is low probability that this species may use the site for foraging.

Western mastiff bat (*Eumops perotis californicus*). Western mastiff bat is classified as a Species of Special Concern by CDFW. The geographic range of the western mastiff bat, although patchy, is largely in western North America, from the western United States to northern and central Mexico, although disjunct populations exist in South America and in Cuba. This species roosts in rock crevices, on cliff faces, and also utilizes crevices in tall buildings and structures with a significant vertical drop (>10 feet). No crevices are present in the project area that would be suitable for nesting by this species; however, there is minimal potential for foraging on site and a low probability of this species occurring on the site.

Hoary bat (*Lasiurus cinereus*). The Hoary bat is a species that the CNDDB is tracking. This species is distributed from North to South America, from Canada to Guatemala, although this species has also been recorded in rare migrations as far as Iceland, Bermuda, and Scotland. This species typically occurs in a variety of habitats with tree or canopy cover, including urban parks, from sea level to 13,200 feet. The species exhibits sex segregation in the summer months, with males generally inhabiting foothills, deserts, and mountains, while females inhabit lowlands and coastal valleys. There is a low probability for this species to nest on the site due to the lack of substantial tree canopy or similar cover; however, this species could use the site to forage for insects, and there is a low probability for that to occur due to the level of disturbances within the Project area.

Western red bat (*Lasiurus frantzii*). The Western red bat is classified as a Species of Special Concern by CDFW. This species is distributed in western North America, from Canada to the United States (west coast, through the Great Plains, to western Texas), and down to Central America; however, recent studies have questioned the northern and southern limits of this species within the *Lasiurus* species complex. This species primarily roosts in trees at least 2 feet tall, from sea-level to higher elevation conifer forests. Since tree cover is insignificant at the project site, this species is not likely to nest on site; however, there is low probability that this species could forage on site.

Western small-footed myotis (*Myotis ciliolabrum*). The Western small-footed myotis is a species being tracked by the CNDDB. This species has a broad distribution across western North America from southern British Columbia in Canada, to United States (coast to the Great Plains) to Mexico (from Baja California to Nuevo Leon). This species prefers a wide range of arid habitats and is generally found in wooded and shrub-covered uplands near water sources, typically roosting in caves, buildings, mines, and crevices. Suitable habitat for nesting does not occur on site, and since there is minimal potential for foraging on site there is a Low probability for this species to occur.

Yuma myotis (*Myotis yumanensis*). Yuma myotis is a species included in the CNDDB, as the CDFW is tracking due to potential population declines. This species is distributed in western North America from southwestern Canada, through the western United States, to Mexico. This species prefers open forest and woodland habitat with sources of water over which to feed. Suitable habitat for nesting does not occur on site; however, this species may fly over the site to access open ocean water for foraging. This species has a low potential to occur.

San Diego desert woodrat (*Neotoma lepida intermedia*). San Diego desert woodrat is classified as a Species of Special Concern by CDFW. This species inhabits middens in coastal scrub of Southern California from San Diego County to San Luis Obispo County. This species prefers moderate to dense canopies, generally within small tree- to shrub-dominated communities (i.e., chaparral, coastal sage scrub, desert scrub, and juniper woodlands) and is particularly abundant in rock outcrops, rocky cliffs, and slopes. Marginal habitat is present on site due to routine vegetation maintenance; however, an occurrence has been reported nearby (within 2 miles, at Pepperdine University), so this species has a moderate potential to encroach the Project area.

Reptiles

California legless lizard (*Anniella* spp.). This species is classified as a Species of Special Concern by the CDFW. This taxon represents any records of species that do not correspond to those currently recognized as a species within the California legless lizard (*Anniella pulchra*) complex, which is comprised of rare taxa that have been split into a variety of new species but were formerly all recognized as *Anniella pulchra*. The distribution of any new taxon recognized under this name is unknown. Since the site is well within the historic distribution of California legless lizard, there is potential that this species could occur. California legless lizard prefer moist warm loose soils in sparsely vegetated areas of coastal dune, valley-foothill, chaparral, and coastal scrub habitats but may be found in upland areas, often under leaf litter or other surface objects. Although sandy soil does not occur on the project site, this species could use small mammal burrows and adjacent vegetation for cover. Potentially suitable habitat occurs on site, and the potential for this species is Moderate.

Southern California legless lizard (*Anniella stebbinsi*). The Southern California legless lizard species is classified as a Species of Special Concern by the CDFW. This species occurs from just south of the Transverse Ranges south to northwestern Baja California. Southern California legless lizard prefers moist, warm, loose soils in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks, but may also be found in upland areas, often under leaf litter or other surface objects. Although sandy soils do not occur on the project site, this species can use small mammal burrows and nearby dense vegetation for cover. Potentially suitable habitat occurs on site, the closest regional occurrence of this species is 3.8 miles away and 7 years old. This species has a Moderate potential to occur.

Coastal whiptail (*Aspidoscelis tigris stejnegeri*). Coastal whiptail is a Species of Special Concern by the CDFW. It is found in coastal southern California, mostly west of the Peninsular Ranges and south of the Transverse Ranges. Its range extends north into Ventura County and south to Baja California. The coastal whiptail occurs in a variety of habitats including various upland and riparian habitats. It is most commonly associated with areas of dense vegetation but is also found around sandy areas along gravelly arroyos or washes. Coastal whiptails were not observed within the Project area but have a high potential to be present at the Project area.

Coast horned lizard (*Phrynosoma blainvillii*). Coast horned lizard whiptail is a Species of Special Concern by CDFW. It is found throughout much of coastal southern California, inland as far as the southern Mojave Desert and to about 6,000 feet elevation AMSL in the mountains. Coast horned lizards occur in sandy soils in a variety of shrubland, grassland, and woodland habitat types. They have been extirpated from much of their historic range by land use changes, but they remain common in natural open space areas where their primary prey (native ants) are found. Coast horned lizards were not observed within the Project area but have a high potential occur in the Project area.

Two-striped gartersnake (*Thamnophis hammondii*). This species is classified as a Species of Special Concern by the CDFW. This species is distributed from central California to Baja California. This species is generally found in coastal regions; however, some populations of this species have been found near perennial streams in desert areas. This species generally occurs in aquatic areas, near permanent waters, such as lakes, streams, or moist rocky areas within riparian areas; however, during winter months, this species is often found in uplands. While suitable habitat does not occur on site, it occurs in nearby regions, and there is some (Low) potential that this species could be found on site.

Invertebrates

Santa Monica Shieldback katydid (*Aglaothorax longipennis*). This species is listed on the CDFW's watch list. While little is known about this species, it is known to occupy chaparral and similar habitats. Chaparral plants are present near the site that may support this species, and the nearest occurrence is less than 2 miles away at the entrance of Big Rock Canyon. Due to the location of the nearest occurrence, this species has been classified as having a Moderate potential to occur. No individuals of this species were observed on the site visit.

Crotch’s bumble bee (*Bombus crotchii*). The Crotch’s bumble bee is a CDFW candidate species. It is a widespread secretive species that is known from more than two hundred locations over a broad geographic range (CDFW 2025). It is typically found in openings in grassland and scrub habitats where it lives in underground colonies, nesting and overwintering in burrows typically made by small mammals. It feeds on wide variety of native and non-native flowering plants and appears to be a generalist preferring the best available nectar sources. Many

nectar sources are present in the Project area and minimal burrow habitat is present. Crotch's bumblebee has a high potential to be present on the site.

American bumble bee (*Bombus pensylvanicus*). The American bumblebee is a CDFW special animal that is considered to have significantly declined throughout its range over the last decade. It is typically found in openings in grassland and rangeland areas. Nests may either be in burrows in the ground, or above ground under grass cover. It feeds on wide variety of native and non-native flowering plants, such as vetches (*Vicia* sp.), clovers (*Trifolium* sp.), thistles (*Cirsium* sp.), sunflowers (*Helianthus* sp.), and may be a generalist for nectar sources. Many food plants are present in the Project area, and minimal burrow habitat is present. American bumblebee has a high potential to be present on the site.

Monarch butterfly (*Danaus plexippus*). The monarch is an invertebrate whose overwinter populations are currently being considered for protection under the CESA. This species ranges from north central California to Baja California, and it typically roosts in tree groves dominated by eucalyptus, pine, or cypress trees. Milkweeds (Asclepias sp.) are known to be both the host plant and primary nectar source for this species. The site has a high probability to support breeding (i.e., not overwintering) populations of this species, primarily due to host plants (milkweed) species being present on site. Due to the site presenting poor overwintering habitat due to lack of significant perennial vegetation (such as eucalyptus trees) that could support these species during overwintering, potential impacts to protected overwintering populations of this species are not expected.

Santa Monica grasshopper (*Trimerotropis occidentiloides*). The Santa Monica grasshopper is a species being tracked in the CNDDB by CDFW species occurrences for this poorly understood species with a small and restricted range. This species is only found in the Santa Monica Mountains and has relatively few reported occurrences within its range. Most occurrences appear to be located on bare hillsides and along dirt trails in chaparral. Marginal habitats are present in areas of the site and adjacent regions, predominantly where barren areas or openings in vegetation are found. Despite the site being subject to regular vegetation clearing, there is a possibility that this species could encroach on the site, and some potential exists for this species to occur, as it has been found in disturbed sites.

3.2.1 Impacts to Sensitive Wildlife

Sensitive wildlife were not detected during the surveys. Construction of the proposed project is not expected to result in direct and indirect impacts to special status wildlife should they be present in the project area or adjacent areas with the implementation of proposed minimization measures and best management practices (BMPs).

Prior to disturbance LADWP would implement MM-BIO-1 which requires preconstruction surveys within the disturbance limits for special-status wildlife species. Should individuals be located, no construction activity shall occur until the animals have left the area (MM-BIO-2). MM-BIO-3 requires a biological monitor to be present to ensure that sensitive species are avoided by construction crews should they enter the

work area. MM-BIO-4 requires surveys for Crotch's bumblebee to determine presence/absence of this species, and to develop requirements for avoidance and minimization should this species be found. MM-BIO-5 limits any night work to avoid impacts to nocturnal animals such as bats or other species that may forage on or near the site.

Implementing BMP-1, BMP-3, BMP-5, BMP-6, and BMP-7, would further reduce impacts by providing worker training, checking for nesting birds, and limiting work to specific areas. BMP-3 would ensure potential impacts to special-status nesting birds protected under the Migratory Bird Treaty Act and by California Fish and Game Code would be avoided.

In combination, with the implementation of mitigation measures and BMPs included in this document, direct and indirect impacts to special-status wildlife would be largely avoided and less than significant.

3.3 Special-Status Vegetation Communities

Eight (8) special-status vegetation communities have been reported in the USGS *Point Dume, Malibu Beach, Topanga, Calabasas, Thousand Oaks, Canoga Park, California* 7.5-minute quadrangles by the CNDDB: California Walnut Woodland, Valley Oak Woodland, Southern Coast Live Oak Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern California Coastal Lagoon; Southern California Steelhead Stream, Southern Coastal Salt Marsh, and Valley Needlegrass Grassland. As previously discussed, the on-site vegetation is mapped as >95% non-native, with sparse shrubs scattered throughout the property in an entirely upland area. None of these special-status vegetation communities occurs on the Project area. Therefore, special-status vegetation communities are not present and are not considered to be a constraint to project implementation.

3.4 Protected Areas (Critical Habitat, Coastal Zone, Los Angeles Sensitive Ecological Areas)

According to the most recent final designations at the time of this writing, the Project area does not fall within designated Critical Habitat for any federally listed species. Therefore, there would be no impacts to designated Critical Habitat as a result of the project (USFWS 2025b).

According to the California Coastal Commission's website (2025), the site is located within the Coastal Zone; therefore, this site project is required to be reviewed by the California Coastal Commission for consistency with the Local Coastal Program. Based on the Los Angeles County Significant Ecological Areas (SEAs) map (2025a), the county designates small northern portions of the Project area as a "Coastal Resource Area," of the Santa Monica Mountains SEA and based on the SMMLCP GIS layers (2025b). The entire site is located outside the SMMLCP planning area and it's designated Ecologically Sensitive Habitat Areas (ESHAs) in the Santa Monica Mountains. The Los Angeles County SEATAC (Significant Ecological Areas Technical Advisory Committee) defers "Coastal Resource Areas" for review by the California Coastal Commission to avoid duplicative analyses and renders the Los Angeles County SEA Ordinance processes inapplicable.

3.5. Jurisdictional Resources

There would be minimal to no direct impact to Waters of the State (WOTS) in the Project area due to vegetation clearance and grading for the Project area. No jurisdictional vegetation or evidence of hydrology is located on the Project area. Grading and staging activities would occur outside of waterways; therefore, there would be no direct impacts to waters of the State. Indirect impacts to WOTS could occur if pollutants or debris were washed into waterways. Potential indirect impacts to jurisdictional vegetation and WOTS would be avoided and minimized by implementing BMP-5, BMP-6, and BMP-7.

4.0 Conclusion

Field surveys were conducted on May 26, 2025 and July 11, 2025. Based on the vegetation mapping, the project site is dominated (>95%) by non-native species. No special-status plant species, wildlife species, or vegetation communities were observed during the survey. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, it was determined that four special-status plant species and 23 special status wildlife have some potential to occur within the project site.

No jurisdictional waters or critical habitat were identified for the Project area, and no impacts were identified.

The implementation of avoidance and minimization measures (MM-BIO 1 through 4 and BMP-1 through 7) outlined below will ensure that any potential impacts would remain less than significant with the implementation of the project.

5.0 Avoidance and Minimization Measures

The measures described below will be implemented as part of the proposed operation and maintenance activities to avoid and minimize potential impacts to special-status species and habitats.

MM-BIO 1. Pre-Work Surveys. A qualified biologist will conduct pre-work surveys within and adjacent to the proposed work area up to 10 days prior to the start of operation and maintenance activities. Pre-work surveys will include, but not limited to: (1) general surveys for botanical and wildlife resources; (2) work areas with flowing or standing water will be visually surveyed for any aquatic species that project activities may impact; and (3) infrastructure, equipment, etc. that may be used as nesting, roosting, or habitat refugia. If the qualified biologist does not find any non-listed or listed special-status species, then work may proceed.

MM-BIO 2. Protection of Listed Special-Status Wildlife Species. If listed special-status wildlife species are observed in the work area during the pre-work surveys, no work will occur until the individual has left the work area. If necessary, the appropriate regulatory agencies will be contacted about how best to proceed.

MM-BIO 3. Biological Monitoring. If the qualified biologist locates non-listed special-status species or other wildlife in the proposed work area during the pre-work surveys, the qualified biologist will determine, based on the type and location of work, what level (e.g., daily, weekly) of monitoring may be required. During monitoring, the qualified biologist will make every effort to keep the species out of harm's way to the extent feasible using one of the following methods: cease operation and maintenance activities until the individual leaves the area on its own; re-direct the individual out of the work area into suitable habitat; or capture and relocate the individual to suitable habitat outside the work area if the qualified biologist has the appropriate handling permit(s). If a listed special-status species is observed in the work area, all operation and maintenance activities will cease until the individual has voluntarily left the work area.

MM-BIO 4. Protection of Special-Status and Native Plants. All non-listed native plant species shall be avoided, if feasible. When not feasible, the plant may be salvaged and replanted in an area that will not be disturbed by operation and maintenance activities. If any federally- or state-listed listed plant species are observed in or near a work area, they will be avoided using an appropriate buffer and no operation and maintenance activities will occur within this buffer.

MM-BIO 5. Crotch's bumble bee. Before any vegetation is cleared or grading begins, a qualified biologist must conduct presence/absence surveys for Crotch's bumble bee to determine if they are present. The biologist shall search both the Project area and adjacent areas to search for foraging bees and underground nests. All survey findings, even if no bees are found, must be reported to the California Department of Fish and Wildlife (CDFW) prior to mobilization of construction crews to the Project area, including details about the survey conditions, the biologist(s) involved, physical environment, and a description of the potentially impacted habitat if a nest is found.

If no Crotch's bumble bees or their nests are found, no further action is needed. However, if nests or potential nests are identified, a Crotch's bumble bee protection plan must be developed and approved by CDFW before any ground disturbance occurs. This plan will outline measures including timing restrictions for ground-disturbing activities (e.g., avoiding raking until from winter months to late March to protect overwintering queens), preconstruction survey requirements that must occur at least 30 days before work starts to find active nests, setting up avoidance buffers around nest sites, and restricting construction activities that could harm nests, biological monitoring during constriction. Any accidental "take" of the bumble bees or their nests is only permitted under specific CDFW authorizations.

MM-BIO 6. Night Work Restrictions. To minimize potential impacts on sensitive biological resources (e.g., nocturnal wildlife [including bats], migratory birds), adjacent residential areas (noise, light pollution), and worker safety, all construction and heavy equipment operation activities shall be restricted to daylight hours only. No work shall commence prior to twilight and all work shall cease by civil dusk, as defined by local sunrise/sunset tables. This restriction applies to all phases of the project, including vegetation clearing, grading, and construction.

If emergency work is required or the project schedule necessitates temporary night work, prior written approval must be obtained from the appropriate regulatory agencies. Any approved night work shall implement additional specific mitigation measures, such as directional shielding of lights, noise reduction best management practices, and biological monitoring, as deemed necessary to minimize potential adverse effects.

BMP-1. Worker Environmental Awareness Training. A Worker Environmental Awareness Training will be provided to all on-site personnel (i.e., LADWP employees and contractors). Educational materials will be created and incorporated into a worker environmental awareness training for all project personnel working in the project area where sensitive habitats and/or species may be present. Educational materials will identify sensitive species and their habitat, discuss any specific measures to protect the species and their habitat, what to do if the species is observed, etc. Upon completion of the training, employees will sign a form stating they attended the program and understand all the protection measures. These forms will be filed at the worksite office.

BMP-2. Work Notification. Prior to the start of operation and maintenance activities, personnel will contact the Environmental Planning and Assessment Group (213-841-0750) to notify them of the proposed work. Environmental Planning and Assessment will be responsible for coordinating work with a qualified biologist. The qualified biologist will determine, based on the type and location of work, if a pre-work survey is required.

BMP-3. Nesting Bird Surveys and Nest Protection. LADWP will make every effort not to remove or otherwise disturb vegetation from February 1 to August 31. If work cannot be avoided during this period, a qualified biologist will conduct a nesting bird survey three days prior to the start of operation and maintenance activities. If an active nest is identified, the qualified biologist will establish a buffer of sufficient size around the nest based on existing conditions, including ambient noise, topography, and disturbance tolerance to avoid any negative impacts on the nesting bird(s). The nest site will be adequately marked such that personnel are aware of the buffer zone. The qualified biologist will take care not to mark the buffer in a way that would draw attention to the nest by potential predators. The qualified biologist will document the baseline behavior of the nesting bird(s) and monitor the behavior of the bird(s) to determine the efficacy of the buffer. If the qualified biologist determines that operation and maintenance activities may be impacting the bird(s), they will adjust the buffer accordingly. No work will occur in the buffer until the nest becomes inactive or the young have left the area.

BMP-4. Prevent the Introduction and Spread of Invasive Plants. LADWP will conduct operation and maintenance activities in a manner that prevents the introduction, transfer, and spread of invasive species, including plants, seeds, animals, and microbes from one project site and/or watershed to another. LADWP will implement applicable best management practices and guidelines for invasive plants as found on the California Invasive Plant Council’s website.

BMP-5. Vehicle or Equipment Maintenance and Fueling. Any equipment or vehicles driven and/or operated while conducting operation and maintenance activities will be checked regularly and maintained as needed to prevent leaks of materials that could impact special-status species and their habitat. No vehicle or equipment maintenance or fueling will be done in or near any waterway where petroleum products or other pollutants from the equipment could enter these areas in the case of a spill or leak.

BMP-6. Pollutants and Debris. No debris, soil, silt, sand, bark, slash, sawdust, trash, construction waste, cement or concrete washings, asphalt, paint, oil or other petroleum products, or any other substances which could be hazardous to aquatic life, or other organic or earthen material from operation and maintenance activities will be allowed to contaminate the soil and/or enter into or placed where it may be washed by rainfall or runoff into any stream, channel, culvert, or ditch.

BMP-7. Trash Abatement and Refuse Removal. Trash and food items will be contained in animal-proof containers and removed at the end of each workday to avoid attracting opportunistic predators such as common ravens, coyotes, and feral dogs.

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Attachment A.

California Department of Fish and Wildlife (CDFW)'s California Natural Diversity Database (CNDDB)

CALIFORNIA DEPARTMENT OF FISH and WILDLIFE RareFind

Query Summary:
Quad IS (Point Dume (3411817) OR Malibu Beach (3411816) OR Topanga (3411815) OR Calabasas (3411826) OR Thousand Oaks (3411827) OR Canoga Park (3411825))

Print Close

CNDDB Element Query Results

Scientific Name	Common Name	Taxonomic Group	Element Code	Total Occs	Returned Occs	Federal Status	State Status	Global Rank	State Rank	CA Rare Plant Rank	Other Status	Habitats
Accipiter cooperii	Cooper's hawk	Birds	ABNKC12040	121	1	None	None	G5	S4	null	CDFW_WL-Watch List, IUCN_LC-Least Concern	Cismontane woodland, Riparian forest, Riparian woodland, Upper montane coniferous forest
Actinemys pallida	southwestern pond turtle	Reptiles	ARAAD02032	481	11	Proposed Threatened	None	G2G3	SNR	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_VU-Vulnerable, USFS_S-Sensitive	null
Agelaius tricolor	tricolored blackbird	Birds	ABPBXB0020	960	3	None	Threatened	G1G2	S2	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_EN-Endangered, USFWS_BCC-Birds of Conservation Concern	Freshwater marsh, Marsh & swamp, Swamp, Wetland
Aglaothorax longipennis	Santa Monica shieldback katydid	Insects	IIORT32020	1	1	None	None	G1G2	S1S2	null	IUCN_CR-Critically Endangered	Chaparral
Aimophila ruficeps canescens	southern California rufous-crowned sparrow	Birds	ABPBX91091	235	3	None	None	G5T3	S4	null	CDFW_WL-Watch List	Chaparral, Coastal scrub
Anaxyrus californicus	arroyo toad	Amphibians	AAABB01230	139	1	Endangered	None	G2G3	S2	null	CDFW_SSC-Species of Special Concern, IUCN_EN-Endangered	Desert wash, Riparian scrub, Riparian woodland, South coast flowing waters, South coast standing waters
Anniella spp.	California legless lizard	Reptiles	ARACC01070	125	10	None	None	G3G4	S3S4	null	CDFW_SSC-Species of Special Concern	null
Anniella stebbinsi	Southern California legless lizard	Reptiles	ARACC01060	427	5	None	None	G3	S3	null	CDFW_SSC-Species of Special Concern, USFS_S-Sensitive	Broadleaved upland forest, Chaparral, Coastal dunes, Coastal scrub
Antrozous pallidus	pallid bat	Mammals	AMACC10010	425	2	None	None	G4	S3	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern, USFS_S-Sensitive	Chaparral, Coastal scrub, Desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Riparian woodland, Sonoran desert scrub, Upper montane coniferous forest, Valley & foothill grassland

Aquila chrysaetos	golden eagle	Birds	ABNKC22010	332	3	None	None	G5	S3	null	BLM_S-Sensitive, CDF_S-Sensitive, CDFW_FP-Fully Protected, CDFW_WL-Watch List, IUCN_LC-Least Concern	Broadleaved upland forest, Cismontane woodland, Coastal prairie, Great Basin grassland, Great Basin scrub, Lower montane coniferous forest, Pinon & juniper woodlands, Upper montane coniferous forest, Valley & foothill grassland
Aspidoscelis tigris stejnegeri	coastal whiptail	Reptiles	ARACJ02143	148	10	None	None	G5T5	S3	null	CDFW_SSC-Species of Special Concern	null
Astragalus brauntonii	Braunton's milk-vetch	Dicots	PDFAB0F1G0	57	42	Endangered	None	G2	S2	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Coastal scrub, Limestone, Valley & foothill grassland
Astragalus pycnostachyus var. lanosissimus	Ventura Marsh milk-vetch	Dicots	PDFAB0F7B1	7	1	Endangered	Endangered	G2T1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden	Coastal dunes, Coastal scrub, Marsh & swamp, Salt marsh, Wetland
Astragalus tener var. titi	coastal dunes milk-vetch	Dicots	PDFAB0F8R2	6	1	Endangered	Endangered	G2T1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal bluff scrub, Coastal dunes, Coastal prairie
Athene cunicularia	burrowing owl	Birds	ABNSB10010	2133	1	None	Candidate Endangered	G4	S2	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern, USFWS_BCC-Birds of Conservation Concern	Coastal prairie, Coastal scrub, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, Valley & foothill grassland
Atractelmis wawona	Wawona riffle beetle	Insects	IICOL58010	80	1	None	None	G3	S1S2	null	null	Aquatic
Atriplex coulteri	Coulter's saltbush	Dicots	PDCHE040E0	121	4	None	None	G3	S2	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley & foothill grassland
Atriplex pacifica	south coast saltscale	Dicots	PDCHE041C0	109	1	None	None	G4	S2	1B.2	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Alkali playa, Coastal bluff scrub, Coastal dunes, Coastal scrub
Atriplex parishii	Parish's brittlescale	Dicots	PDCHE041D0	15	1	None	None	G1G2	S1	1B.1	BLM_S-Sensitive, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank, USFS_S-Sensitive	Alkali playa, Chenopod scrub, Meadow & seep, Vernal pool, Wetland
Atriplex serenana var. davidsonii	Davidson's saltscale	Dicots	PDCHE041T1	26	1	None	None	G5T1	S1	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal bluff scrub, Coastal scrub
Baccharis malibuensis	Malibu baccharis	Dicots	PDAST0W0W0	13	10	None	None	G1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland
Bombus crotchii	Crotch's bumble bee	Insects	IIHYM24480	640	19	None	Candidate Endangered	G2	S2	null	IUCN_EN-Endangered	null
Bombus pensylvanicus	American bumble bee	Insects	IIHYM24260	810	20	None	None	G3G4	S2	null	IUCN_VU-Vulnerable	Coastal prairie, Great Basin grassland,

												Valley & foothill grassland
Buteo swainsoni	Swainson's hawk	Birds	ABNKC19070	2585	3	None	Threatened	G5	S4	null	BLM_S-Sensitive, IUCN_LC-Least Concern	Great Basin grassland, Riparian forest, Riparian woodland, Valley & foothill grassland
California Walnut Woodland	California Walnut Woodland	Woodland	CTT71210CA	76	8	None	None	G2	S2.1	null	null	Cismontane woodland
Calochortus clavatus var. gracilis	slender mariposa-lily	Monocots	PMLIL0D096	143	9	None	None	G4T2T3	S2S3	1B.2	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Chaparral, Coastal scrub, Valley & foothill grassland
Calochortus plummerae	Plummer's mariposa-lily	Monocots	PMLIL0D150	230	16	None	None	G4	S4	4.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley & foothill grassland
Chloropyron maritimum ssp. maritimum	salt marsh bird's-beak	Dicots	PDSCR0J0C2	26	1	Endangered	Endangered	G4?T1	S1	1B.2	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank, SB_SBBG-Santa Barbara Botanic Garden	Coastal dunes, Marsh & swamp, Salt marsh, Wetland
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	Dicots	PDPGN040J1	21	2	None	Endangered	G3T1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Coastal scrub, Valley & foothill grassland
Chorizanthe parryi var. parryi	Parry's spineflower	Dicots	PDPGN040J2	150	1	None	None	G3T2	S2	1B.1	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Chaparral, Cismontane woodland, Coastal scrub, Valley & foothill grassland
Cicindela hirticollis gravida	sandy beach tiger beetle	Insects	IICOL02101	34	1	None	None	G5T2	S2	null	null	Coastal dunes
Coelus globosus	globose dune beetle	Insects	IICOL4A010	50	2	None	None	G1G2	S1S2	null	IUCN_VU-Vulnerable	Coastal dunes
Danaus plexippus plexippus pop. 1	monarch - California overwintering population	Insects	IILEPP2012	405	16	Proposed Threatened	None	G4T1T2Q	S2	null	IUCN_EN-Endangered, USFS_S-Sensitive	Closed-cone coniferous forest
Deinandra minthornii	Santa Susana tarplant	Dicots	PDAST4R0J0	35	25	None	Rare	G2	S2	1B.2	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Coastal scrub
Delphinium parryi ssp. blochmaniae	dune larkspur	Dicots	PDRAN0B1B1	27	1	None	None	G4T2	S2	1B.2	BLM_S-Sensitive	Chaparral, Coastal dunes
Diadophis punctatus modestus	San Bernardino ringneck snake	Reptiles	ARADB10015	14	2	None	None	G5T2T3	S2?	null	USFS_S-Sensitive	null
Dithyrea maritima	beach spectaclepod	Dicots	PDBRA10020	28	1	None	Threatened	G1	S1	1B.1	BLM_S-Sensitive, SB_SBBG-Santa Barbara Botanic Garden	Coastal dunes, Coastal scrub
Dudleya blochmaniae ssp. blochmaniae	Blochman's dudleya	Dicots	PDCRA04051	81	4	None	None	G3T2	S2	1B.1	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Coastal bluff scrub, Coastal scrub, Ultramafic, Valley & foothill grassland
Dudleya cymosa ssp. agourensis	Agoura Hills dudleya	Dicots	PDCRA040A7	8	8	Threatened	None	G5T1	S1	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-	Chaparral, Cismontane woodland

											Santa Barbara Botanic Garden	
Dudleya cymosa ssp. marcescens	marcescent dudleya	Dicots	PDCRA040A3	14	7	Threatened	Rare	G5T2	S2	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden	Chaparral
Dudleya cymosa ssp. ovatifolia	Santa Monica dudleya	Dicots	PDCRA040A5	3	2	Threatened	None	G5T1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Coastal scrub
Dudleya multicaulis	many-stemmed dudleya	Dicots	PDCRA040H0	154	1	None	None	G2	S2	1B.2	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Chaparral, Coastal scrub, Valley & foothill grassland
Dudleya parva	Conejo dudleya	Dicots	PDCRA04016	13	1	Threatened	None	G1	S1	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Coastal scrub, Valley & foothill grassland
Eriogonum crocatum	Conejo buckwheat	Dicots	PDPGN081G0	13	1	None	Rare	G1	S1	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Coastal scrub, Valley & foothill grassland
Eucyclogobius newberryi	tidewater goby	Fish	AFCQN04010	127	1	Endangered	None	G3	S3	null	AFS_EN-Endangered, CDFW_SSC-Species of Special Concern, IUCN_NT-Near Threatened	Aquatic, Klamath/North coast flowing waters, Sacramento/San Joaquin flowing waters, South coast flowing waters
Euderma maculatum	spotted bat	Mammals	AMACC07010	68	1	None	None	G4	S3	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern	null
Eugnosta busckana	Busck's gallmoth	Insects	IILEM2X090	15	1	None	None	G1G3	S2S3	null	null	Coastal dunes, Coastal scrub
Eumops perotis californicus	western mastiff bat	Mammals	AMACD02011	296	6	None	None	G4G5T4	S3S4	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern	Chaparral, Cismontane woodland, Coastal scrub, Valley & foothill grassland
Euphydryas editha quino	quino checkerspot butterfly	Insects	IILEPK405L	185	2	Endangered	None	G4G5T1T2	S1S2	null	null	Chaparral, Coastal scrub
Falco peregrinus anatum	American peregrine falcon	Birds	ABNKD06071	76	1	Delisted	Delisted	G4T4	S3S4	null	CDF_S-Sensitive	null
Gila orcuttii	arroyo chub	Fish	AFCJB13120	49	1	None	None	G1	S2	null	AFS_VU-Vulnerable, CDFW_SSC-Species of Special Concern, IUCN_VU-Vulnerable, USFS_S-Sensitive	Aquatic, South coast flowing waters
Gonidea angulata	western ridged mussel	Mollusks	IMBIV19010	158	1	None	None	G3	S2	null	IUCN_VU-Vulnerable	Aquatic
Horkelia cuneata var. puberula	mesa horkelia	Dicots	PDROS0W045	103	2	None	None	G4T1	S1	1B.1	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Chaparral, Cismontane woodland, Coastal scrub
Isocoma menziesii var. decumbens	decumbent goldenbush	Dicots	PDAST57091	126	1	None	None	G3G5T2T3	S2	1B.2	BLM_S-Sensitive, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, Coastal scrub
Lasiurus cinereus	hoary bat	Mammals	AMACC05032	238	1	None	None	G3G4	S4	null	IUCN_LC-Least Concern	Broadleaved upland forest, Cismontane woodland, Lower montane coniferous forest, North

												coast coniferous forest
Lasiurus frantzii	western red bat	Mammals	AMACC05080	128	3	None	None	G4	S3	null	CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern	Cismontane woodland, Lower montane coniferous forest, Riparian forest, Riparian woodland
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Dicots	PDAST5L0A1	109	2	None	None	G4T2	S2	1B.1	BLM_S-Sensitive, SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden	Alkali playa, Marsh & swamp, Salt marsh, Vernal pool, Wetland
Macrotus californicus	California leaf-nosed bat	Mammals	AMACB01010	46	1	None	None	G3G4	S3	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern	Riparian scrub, Sonoran desert scrub
Monardella hypoleuca ssp. hypoleuca	white-veined monardella	Dicots	PDLAM180A5	29	3	None	None	G4T3	S3	1B.3	SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Cismontane woodland
Myotis ciliolabrum	western small-footed myotis	Mammals	AMACC01230	82	2	None	None	G5	S3	null	BLM_S-Sensitive, IUCN_LC-Least Concern	null
Myotis yumanensis	Yuma myotis	Mammals	AMACC01020	265	2	None	None	G5	S4	null	BLM_S-Sensitive, IUCN_LC-Least Concern	Lower montane coniferous forest, Riparian forest, Riparian woodland, Upper montane coniferous forest
Navarretia ojaiensis	Ojai navarretia	Dicots	PDPLM0C130	22	7	None	None	G2	S2	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Chaparral, Coastal scrub, Valley & foothill grassland
Neotoma lepida intermedia	San Diego desert woodrat	Mammals	AMAFF08041	132	1	None	None	G5T3T4	S3S4	null	CDFW_SSC-Species of Special Concern	Coastal scrub
Nolina cismontana	chaparral nolina	Monocots	PMAGA080E0	68	9	None	None	G3	S3	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_SBBG-Santa Barbara Botanic Garden, USFS_S-Sensitive	Chaparral, Coastal scrub, Ultramafic
Oncorhynchus mykiss irideus pop. 10	steelhead - southern California DPS	Fish	AFCHA0209J	19	2	Endangered	Candidate Endangered	G5T1Q	S1	null	AFS_EN-Endangered	Aquatic, South coast flowing waters
Pelazoneuron puberulum var. sonorense	Sonoran maiden fern	Ferns	PPTHE05192	27	2	None	None	G5T4	S2	2B.2	USFS_S-Sensitive	Meadow & seep, Wetland
Pentachaeta lyonii	Lyon's pentachaeta	Dicots	PDAST6X060	45	26	Endangered	Endangered	G1	S1	1B.1	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden	Chaparral, Coastal scrub, Valley & foothill grassland
Phrynosoma blainvillii	coast horned lizard	Reptiles	ARACF12100	841	9	None	None	G4	S4	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern	Chaparral, Cismontane woodland, Coastal bluff scrub, Coastal scrub, Desert wash, Pinon & juniper woodlands, Riparian scrub, Riparian woodland, Valley & foothill grassland
Polioptila californica californica	coastal California gnatcatcher	Birds	ABPBJ08081	1159	6	Threatened	None	G4G5T3Q	S2	null	CDFW_SSC-Species of Special Concern	Coastal bluff scrub, Coastal scrub
Quercus dumosa	Nuttall's scrub oak	Dicots	PDFAG050D0	180	1	None	None	G3	S3	1B.1	BLM_S-Sensitive, IUCN_EN-Endangered, SB_CRES-San Diego Zoo CRES Native Gene Seed	Chaparral, Closed-cone coniferous forest, Coastal scrub

											Bank, USFS_S-Sensitive	
Rana draytonii	California red-legged frog	Amphibians	AAABH01022	1796	2	Threatened	None	G2G3	S2S3	null	CDFW_SSC-Species of Special Concern, IUCN_VU-Vulnerable	Aquatic, Artificial flowing waters, Artificial standing waters, Freshwater marsh, Marsh & swamp, Riparian forest, Riparian scrub, Riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South coast flowing waters, South coast standing waters, Wetland
Riparia riparia	bank swallow	Birds	ABPAU08010	299	2	None	Threatened	G5	S3	null	BLM_S-Sensitive, IUCN_LC-Least Concern	Riparian scrub, Riparian woodland
Senecio aphanactis	chaparral ragwort	Dicots	PDAST8H060	98	2	None	None	G3	S2	1B.2	SB_CalBG/RSABG-California/Rancho Santa Ana Botanic Garden, SB_CRES-San Diego Zoo CRES Native Gene Seed Bank	Chaparral, Cismontane woodland, Coastal scrub
Sidalcea neomexicana	salt spring checkerbloom	Dicots	PDMAL110J0	30	1	None	None	G4	S2	2B.2	USFS_S-Sensitive	Alkali playa, Chaparral, Coastal scrub, Lower montane coniferous forest, Mojavean desert scrub, Wetland
Socalchemmis gertschi	Gertsch's socalchemmis spider	Arachnids	ILARAU7010	3	2	None	None	G1	S1	null	null	Coastal scrub
Southern California Coastal Lagoon	Southern California Coastal Lagoon	Inland Waters	CALE1220CA	3	1	None	None	GNR	SNR	null	null	null
Southern California Steelhead Stream	Southern California Steelhead Stream	Inland Waters	CARE2310CA	3	1	None	None	GNR	SNR	null	null	null
Southern Coast Live Oak Riparian Forest	Southern Coast Live Oak Riparian Forest	Riparian	CTT61310CA	246	15	None	None	G4	S4	null	null	Riparian forest
Southern Coastal Salt Marsh	Southern Coastal Salt Marsh	Marsh	CTT52120CA	24	1	None	None	G2	S2.1	null	null	Marsh & swamp, Wetland
Southern Sycamore Alder Riparian Woodland	Southern Sycamore Alder Riparian Woodland	Riparian	CTT62400CA	230	17	None	None	G4	S4	null	null	Riparian woodland
Spea hammondii	western spadefoot	Amphibians	AAABF02020	1445	4	Proposed Threatened	None	G2G3	S3S4	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_NT-Near Threatened	Cismontane woodland, Coastal scrub, Valley & foothill grassland, Vernal pool, Wetland
Taxidea taxus	American badger	Mammals	AMAJF04010	648	2	None	None	G5	S3	null	CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern	Alkali marsh, Alkali playa, Alpine, Alpine dwarf scrub, Bog & fen, Brackish marsh, Broadleaved upland forest, Chaparral, Chenopod scrub, Cismontane woodland, Closed-cone coniferous forest, Coastal

												bluff scrub, Coastal dunes, Coastal prairie, Coastal scrub, Desert dunes, Desert wash, Freshwater marsh, Great Basin grassland, Great Basin scrub, Interior dunes, lone formation, Joshua tree woodland, Limestone, Lower montane coniferous forest, Marsh & swamp, Meadow & seep, Mojavean desert scrub, Montane dwarf scrub, North coast coniferous forest, Oldgrowth, Pavement plain, Redwood, Riparian forest, Riparian scrub, Riparian woodland, Salt marsh, Sonoran desert scrub, Sonoran thorn woodland, Ultramafic, Upper montane coniferous forest, Upper Sonoran scrub, Valley & foothill grassland
Thamnophis hammondii	two-striped gartersnake	Reptiles	ARADB36160	184	4	None	None	G4	S3S4	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_LC-Least Concern, USFS_S-Sensitive	Marsh & swamp, Riparian scrub, Riparian woodland, Wetland
Thamnophis sirtalis pop. 1	south coast gartersnake	Reptiles	ARADB3613F	48	2	None	None	G5T1T2	S1S2	null	CDFW_SSC-Species of Special Concern	Artificial standing waters, Marsh & swamp, Riparian scrub, Riparian woodland, South coast flowing waters, South coast standing waters, Wetland
Tortula californica	California screw moss	Bryophytes	NBMUS7L090	15	1	None	None	G2G3	S2?	1B.2	BLM_S-Sensitive	Chenopod scrub, Valley & foothill grassland
Trimerotropis occidentiloides	Santa Monica grasshopper	Insects	IIORT36300	4	2	None	None	G2	S2	null	IUCN_EN-Endangered	Chaparral
Valley Needlegrass Grassland	Valley Needlegrass Grassland	Herbaceous	CTT42110CA	45	1	None	None	G3	S3.1	null	null	Valley & foothill grassland
Valley Oak Woodland	Valley Oak Woodland	Woodland	CTT71130CA	91	10	None	None	G3	S2.1	null	null	Cismontane woodland
Vireo bellii pusillus	least Bell's vireo	Birds	ABPBW01114	505	2	Endangered	Endangered	G5T2	S3	null	null	Riparian forest, Riparian scrub, Riparian woodland

Attachment B.

California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CIRP)

ScientificName	CommonName	Family	Lifeform	CRPR	GRank	SRank	OtherStatus	CESA	FESA	BloomingPeriod	Habitat	MicrohabitatDetails	Microhabitat
Astragalus brauntonii	Braunton's milk-vetch	Fabaceae	perennial herb	1B.1	G2	S2	SB_CalBG/RSABG; SB_	None	FE	Jan-Aug	Chaparral, Coastal scrub, Valley and foothill grassland	recent burns or disturbed areas, usually sandstone with carbonate layers	Burned areas (sometimes), Carbonate, Disturbed areas (sometimes), Sandstone (usually)
Atriplex coulteri	Coulter's saltbush	Chenopodiaceae	perennial herb	1B.2	G3	S2	SB_CalBG/RSABG; SB_	None	None	Mar-Oct	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland		Alkaline (sometimes), Clay (sometimes)
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	G5T1	S1	SB_CalBG/RSABG	None	None	Apr-Oct	Coastal bluff scrub, Coastal scrub		Alkaline
Baccharis plummerae ssp. plummerae	Plummer's baccharis	Asteraceae	perennial deciduous	4.3	G3T3	S3	SB_CalBG/RSABG	None	None	May-Oct	Broadleafed upland forest, Chaparral, Cismontane woodland, Coastal scrub		Rocky
Cercocarpus betuloides var. blancheae	island mountain-mahoga	Rosaceae	perennial evergreen	4.3	G5T4	S4	SB_CalBG/RSABG	None	None	Feb-May	Chaparral, Closed-cone coniferous forest		
Dudleya blochmaniae ssp. blochmaniae	Blochman's dudleya	Crassulaceae	perennial herb	1B.1	G3T2	S2	BLM_S; SB_CalBG/RSA	None	None	Apr-Jun	Chaparral, Coastal bluff scrub, Coastal scrub, Valley and foothill grassland		Clay (often), Rocky, Serpentine
Isocoma menziesii var. decumbens	decumbent goldenbush	Asteraceae	perennial shrub	1B.2	G3G5T2	S2	BLM_S; SB_CRES	None	None	Apr-Nov	Chaparral, Coastal scrub (often disturbed areas, sandy)		
Juglans californica	Southern California black	Juglandaceae	perennial deciduous	4.2	G4	S4	IUCN_NT; SB_CalBG/R	None	None	Mar-Aug	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland	alluvial	
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	G4T2	S2	BLM_S; SB_CalBG/RSA	None	None	Feb-Jun	Marshes and swamps (coastal salt), Playas, Vernal pools		
Lilium humboldtii ssp. ocellatum	ocellated Humboldt lily	Liliaceae	perennial bulbiferou	4.2	G4T4?	S4?	SB_CalBG/RSABG; SB_	None	None	Mar-Jul(Aug)	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Riparian woodland		Openings
Monardella hypoleuca ssp. hypoleuca	white-veined monardella	Lamiaceae	perennial herb	1B.3	G4T3	S3	SB_SBBG	None	None	(Apr)May-Aug(S	Chaparral, Cismontane woodland		
Pentachaeta lyonii	Lyon's pentachaeta	Asteraceae	annual herb	1B.1	G1	S1	SB_CalBG/RSABG	CE	FE	(Feb)Mar-Aug	Chaparral (openings), Coastal scrub, Valley and foothill grassland		Clay, Rocky
Romneya coulteri	Coulter's matilija poppy	Papaveraceae	perennial rhizomato	4.2	G4	S4	SB_CalBG/RSABG	None	None	Mar-Jul(Aug)	Chaparral, Coastal scrub		Burned areas (often)

Attachment C.

U.S. Fish and Wildlife Service (USFWS)’s Information for Planning and Consultation (IPaC)

IPaC U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

Location

Los Angeles County, California



Local office

Ventura Fish And Wildlife Office

(805) 644-1766
(805) 644-3958
FW8VenturaSection7@FWS.Gov

2493 Portola Road, Suite B
Ventura, CA 93003-7726

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

NOT FOR CONSULTATION

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Condor Gymnogyps californianus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8193	Endangered
California Least Tern Sternula antillarum browni Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8104	Endangered
Coastal California Gnatcatcher Polioptila californica californica Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo Vireo bellii pusillus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Marbled Murrelet Brachyramphus marmoratus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/4467	Threatened
Southwestern Willow Flycatcher Empidonax traillii extimus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered
Western Snowy Plover Charadrius nivosus nivosus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened

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Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Southwestern Pond Turtle Actinemys pallida Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4768	Proposed Threatened

Amphibians

NAME	STATUS
Western Spadefoot Spea hammondii No critical habitat has been designated for this species.	Proposed Threatened

Fishes

NAME	STATUS
Tidewater Goby Eucyclogobius newberryi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/57	Endangered

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

Crustaceans

NAME	STATUS

NOT FOR CONSULTATION

NAME	STATUS
Riverside Fairy Shrimp Streptocephalus woottoni	Endangered

Wherever found

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/8148

NAME	STATUS
Vernal Pool Fairy Shrimp Branchinecta lynchi	Threatened

Wherever found

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/498

Flowering Plants

NAME	STATUS
Braunton's Milk-vetch Astragalus brauntonii	Endangered

Wherever found

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/5674

NAME	STATUS
California Orcutt Grass Orcuttia californica	Endangered

Wherever found

No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/4923

NAME	STATUS
Gambel's Watercress Rorippa gambellii	Endangered

Wherever found

No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/4201

NAME	STATUS
Lyon's Pentachaeta Pentachaeta lyonii	Endangered

Wherever found

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/4699

NAME	STATUS
Marcescent Dudleya Dudleya cymosa ssp. marcescens	Threatened

Wherever found

No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/7145

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Marsh Sandwort Arenaria paludicola — Endangered
Wherever found
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/2229

Nevin's Barberry Berberis nevinii — Endangered
Wherever found
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/8025

Salt Marsh Bird's-beak Cordylanthus maritimus ssp. maritimus — Endangered
Wherever found
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6447

Santa Monica Mountains Dudleyea Dudleya cymosa ssp. ovatifolia — Threatened
Wherever found
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/2538

Spreading Navarretia Navarretia fossalis — Threatened
Wherever found
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/1334

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Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information

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on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jan 1 to Aug 31

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Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the

maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

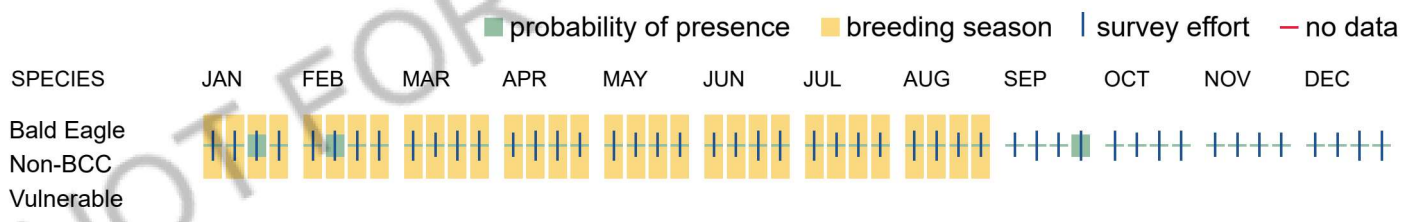
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report
On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low

survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

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NAME	BREEDING SEASON
Allen's Hummingbird Selasphorus sasin This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jan 1 to Aug 31
Belding's Savannah Sparrow Passerculus sandwichensis beldingi This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8	Breeds Apr 1 to Aug 15
Black Oystercatcher Haematopus bachmani This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9591	Breeds Apr 15 to Oct 31
Black Skimmer Rynchops niger This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5234	Breeds May 20 to Sep 15
Black Storm-petrel Hydrobates melania This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Nov 15
Black Turnstone Arenaria melanocephala This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Brandt's Cormorant Urile penicillatus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 15 to Sep 15

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Bullock's Oriole Icterus bullockii — Breeds Mar 21 to Jul 25
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

California Gull Larus californicus — Breeds Mar 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

California Thrasher Toxostoma redivivum — Breeds Jan 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Clark's Grebe Aechmophorus clarkii — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Common Yellowthroat Geothlypis trichas sinuosa — Breeds May 20 to Jul 31
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/2084

Elegant Tern Thalasseus elegans — Breeds Apr 5 to Aug 5
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8561

Gull-billed Tern Gelochelidon nilotica — Breeds May 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9501

Heermann's Gull Larus heermanni — Breeds Mar 15 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Lawrence's Goldfinch Spinus lawrencei — Breeds Mar 20 to Sep 20
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

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Marbled Godwit Limosa fedoa — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Northern Harrier Circus hudsonius — Breeds Apr 1 to Sep 15

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8350

Nuttall's Woodpecker Dryobates nuttallii — Breeds Apr 1 to Jul 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9410

Oak Titmouse Baeolophus inornatus — Breeds Mar 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9656

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Red Knot Calidris canutus roselaari — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8880

Santa Barbara Song Sparrow Melospiza melodia graminea — Breeds Mar 1 to Sep 5

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/5513

Scripps's Murrelet Synthliboramphus scrippsi — Breeds Feb 20 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

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Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Western Grebe *aechmophorus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Western Gull *Larus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 21 to Aug 25
Western Screech-owl *Megascops kennicottii cardonensis* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jun 30
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Wrentit *Chamaea fasciata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 10

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Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

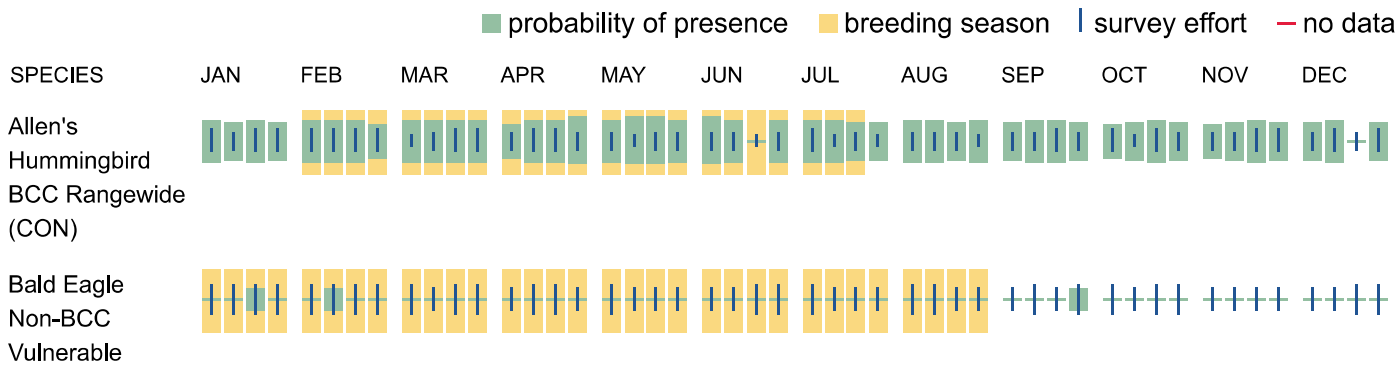
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

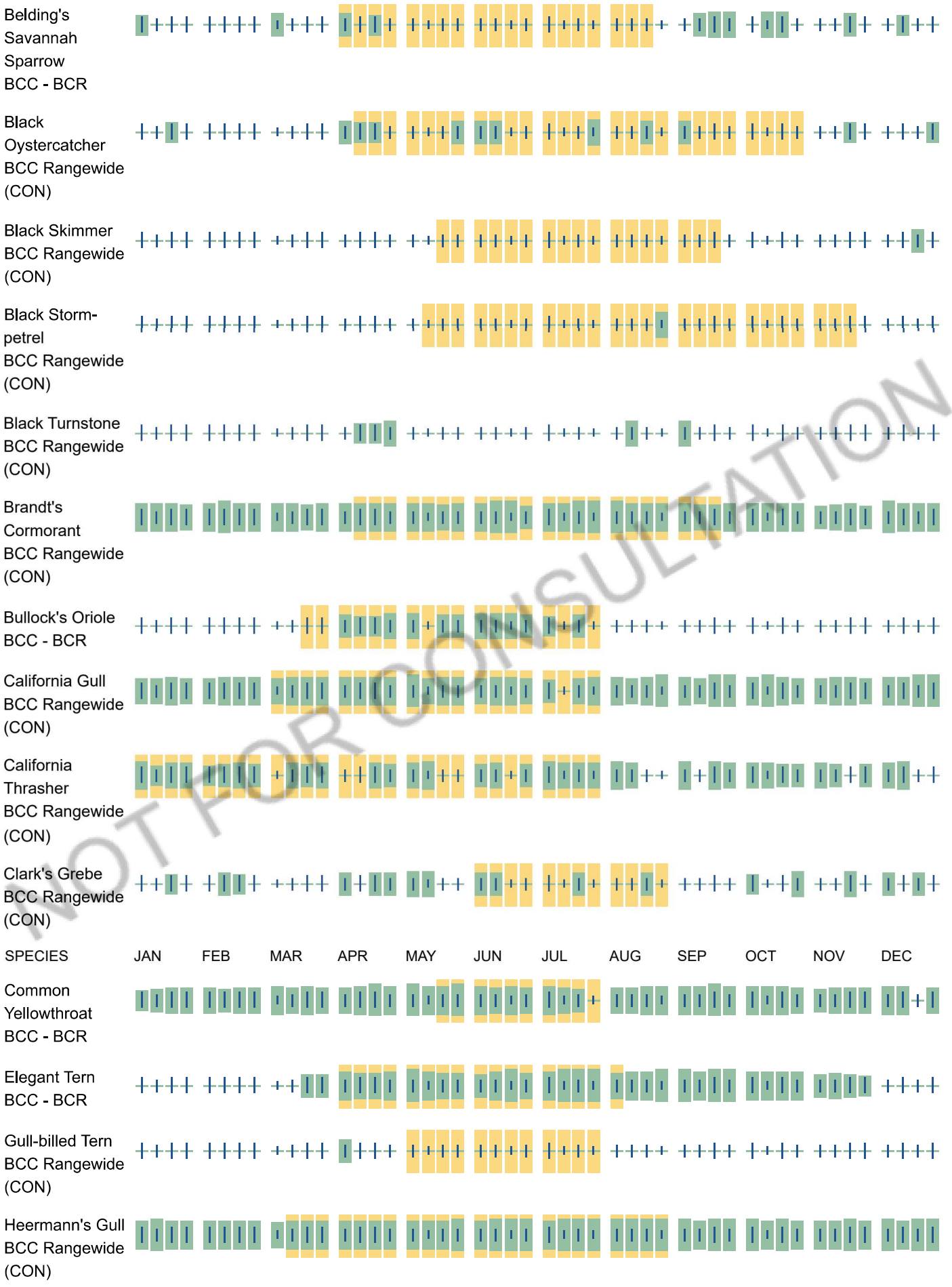
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

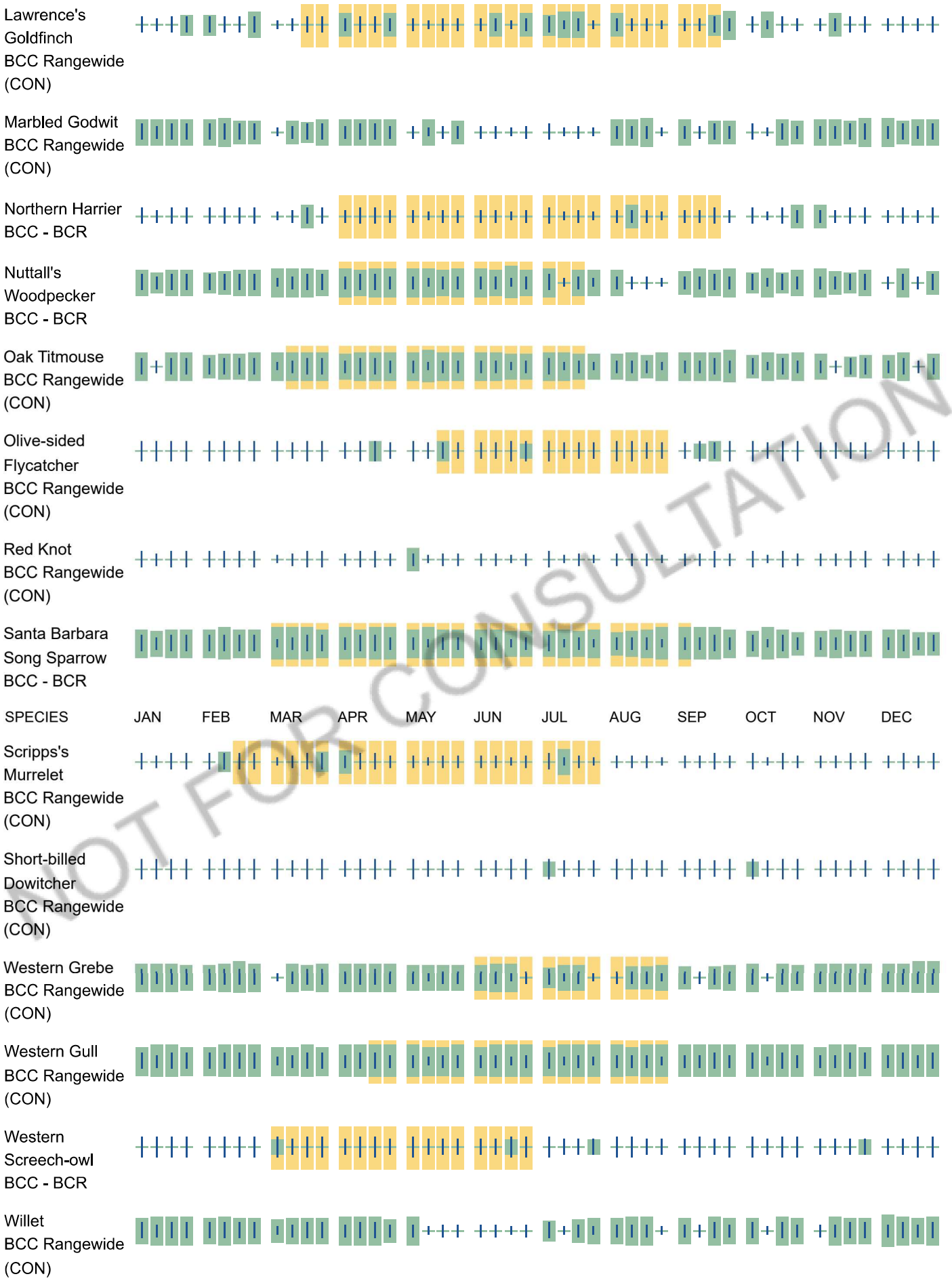
Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Wrentit
BCC Rangewide
(CON)



Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as "Vulnerable". See the FAQ "What are the levels of concern for migratory birds?" for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

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Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then

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the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

Wildlife refuges and fish hatcheries

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Refuge and fish hatchery information is not available at this time

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE
R4SBA

A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

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Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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Los Angeles Department of Water & Power
BUILDING A STRONGER L.A.

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Chante L. Mitchell, Secretary
Janisse Quiñones, Chief Executive Officer and Chief Engineer

March 9, 2026

Ms. Samantha Elias
City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265

Dear Ms. Elias:

Subject: Corral Canyon Laydown Area Project - 4000 Corral Canyon Road Emergency Coastal Development Permit No. 25-017 ESHA Findings

The Los Angeles Department of Water and Power (LADWP) submits the enclosed Environmentally Sensitive Habitat Area (ESHA) Assessment, as discussed at our meeting on Tuesday, March 3, 2026, for the emergency Coastal Development Permit 25-017, for the Corral Canyon Laydown Project located at 4000 Corral Canyon Road.

LADWP appreciates all your support and time in working with us. If you have any questions or need additional information, please feel free to contact me at (213) 367-0436.

Sincerely,

Katherine Rubin
Director of Corporate Environmental Affairs

JAH:cv
Enclosure

Corral Canyon Staging Area Environmentally Sensitive Habitat Area (ESHA) Assessment

Prepared by:

Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

March 2026

1. Introduction

1.1 Purpose

This memorandum has been prepared to assess the Los Angeles Department of Water and Power (LADWP)'s proposed laydown area located at 4000 Corral Canyon Road in Malibu, California for Environmentally Sensitive Habitat Area (ESHA) as defined in the City of Malibu's Local Coastal Program (LCP). This memorandum supplements the Biological Resources Assessment (BRA, LADWP, 2025) prepared to support the emergency Coastal Development Permit (eCDP) for the laydown area.

1.2 Background

The LADWP-owned Malibu property encompasses 97 acres in the Santa Monica Mountains Significant Ecological Area. Corral Canyon Road abuts the property and provides access to the site, located at approximately 4000 Corral Canyon Road.

The 2025 Palisades Fire destroyed large areas of Pacific Palisades, Topanga, and Malibu, burning 23,448 acres and destroying 6,837 structures, making it the most destructive fire to occur in the history of the City of Los Angeles. LADWP's emergency response crew is in need of a site for emergency command staging and is targeting use of landholdings near the burned areas, including the Corral Canyon property, which is located approximately 12 miles from the Pacific Palisades.

1.3 Project Description

The southern portion of the property would be proposed as a temporary utility laydown yard to support fire restoration efforts (restoring and upgrading the power distribution system in the Pacific Palisades; Figures 1, 2 and 3). Up to one acre would be mowed and used for laydown, access roads, and trailer staging. Roads would require grading to improve access to the site. All active areas would be covered with four to six inches of aggregate base. Locking shipping containers (Conex) would house wire, cable and insulators. The laydown area would hold underground prefab concrete structures and electric conduits. The proposed area would be enclosed with approximately 1,600 linear feet of fencing. No nighttime lighting, portable toilets, restrooms or utility hooks ups are proposed.

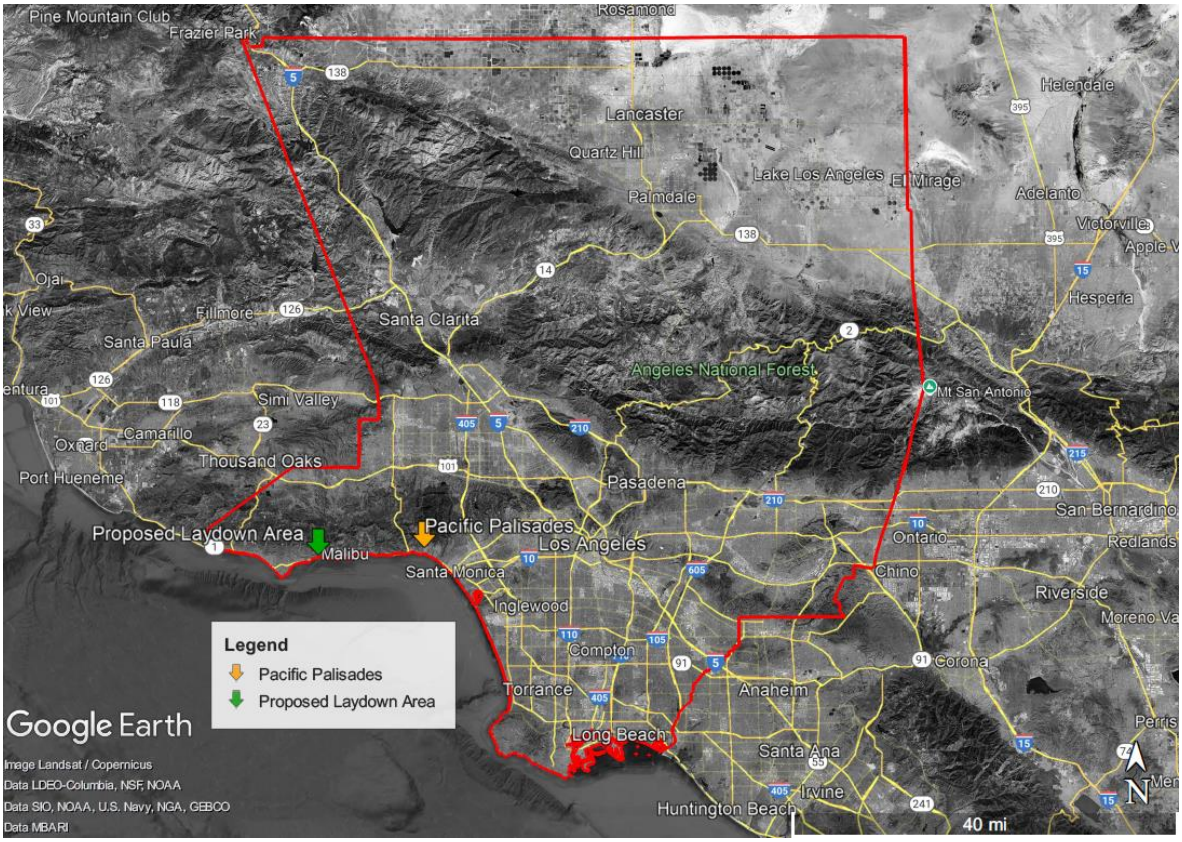


Figure 1. Regional Map



Figure 2. Laydown and Entrance

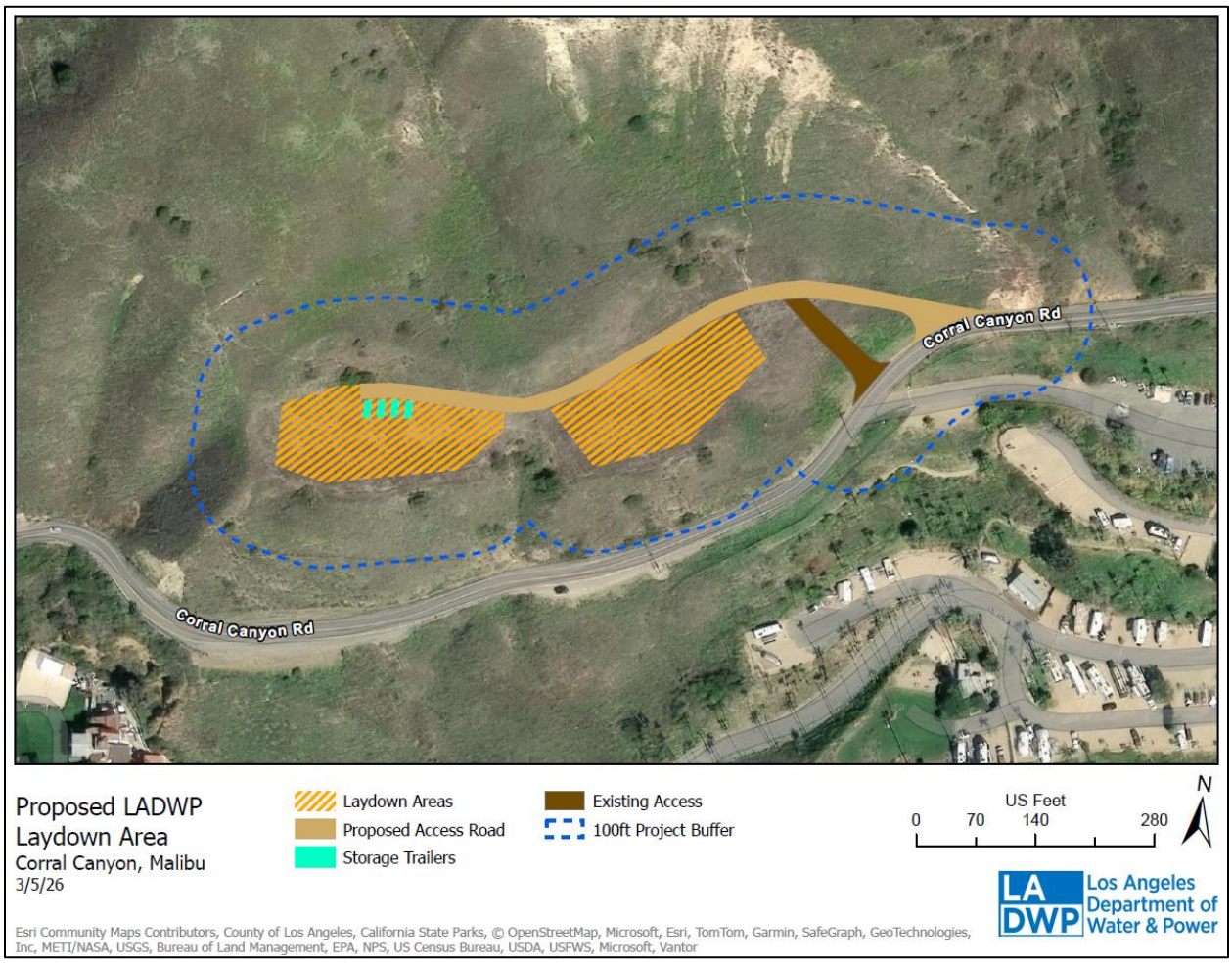


Figure 3. Proposed Laydown Area

1.4 Local Regulations

City of Malibu Local Coastal Program

The entire City of Malibu is located within the California coastal zone, which means that all development and activity occurring within city limits (unless considered exempt) is subject to the regulations of the City's Local Coastal Program (LCP). LCPs contain the ground rules for protecting sensitive coastal resources and public access along the entire coastline of California. LCPs are required for all jurisdictions located within the coastal zone and the California Coastal Commission (CCC) is tasked with overseeing certification of those LCPs before they become law at the local level. Likewise, any amendments to an LCP must first be certified by the CCC before taking effect. Malibu's LCP was certified in 2002 and grants the City authority to review and approve coastal development permits (CDPs) at the local level. The policies and regulations of the LCP supersede any policy or regulation of the City's General Plan or Zoning Code in the event there is a conflict between the documents. Zoning is administered through the

LCP Local Implementation Plan (LIP), and land use is administered through the LCP Land Use Plan (LUP). Combined, the two documents constitute the City's LCP.

Environmentally Sensitive Habitat Area (ESHA)

The City of Malibu LCP provides protection for ESHA by restricting developments that occur on or near ESHA. The City of Malibu LCP ESHA Overlay Map was created to identify the broad areas of ESHA in the City, and the parcel is within LCP ESHA Overlay Map areas. The City of Malibu LCP Local Implementation Plan (LIP) defines ESHA as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." ESHAs protected in the LIP include areas of native habitats such as woodland, coastal bluff, coastal sage scrub, and chaparral; and wetlands, streams, and riparian areas surrounding streams. See section 2.3 for more details on ESHA findings.

1.5 Literature Review and Records Searches

As discussed in the BRA, the following natural resource databases, management agency websites, and biological reports were used to identify special-status species and habitats:

- California Department of Fish and Wildlife (CDFW)'s California Natural Diversity Database (CNDDB; CDFW 2025);
- California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CIRP; CNPS 2025);
- U.S. Fish and Wildlife Service (USFWS)'s Information for Planning and Consultation (IPaC) (USFWS 2025a);
- USFWS Environmental Conservation Online System Critical Habitat Mapper (USFWS 2025b);
- USFWS National Wetlands Inventory (USFWS 2025c)

1.6 Habitat Assessment

LADWP Environmental Planning and Assessment Staff provided habitat assessments of the proposed project site on May 26, 2025, July 11, 2025, October 25, 2025, February 12, 2026, February 18, 2026, and March 4, 2026. The habitat assessment on March 4, 2026 included a 100-foot buffer around the project site (depicted in Figure 3).

2.0 BRA Findings

2.1 Vegetation Communities and Land Cover Types

Four vegetation communities and land cover types were mapped within the survey area (project area with 100-foot buffer). One vegetation community was mapped within the project area. The vegetation communities and land cover types mapped within the project site are summarized in table 1 and their spatial distribution is presented in Figure 4.



Figure 4. Vegetation Community Map

Table 1. Vegetation Communities and Land Cover Types in the Survey Area and Project Area

Vegetation Community or Land Cover Type	Alliance[1]	Association	Ranking[2]	Acreage within the Survey Area	Acreage within the Project Area
Native Vegetation Communities					
Laurel Sumac Scrub	*Malosma laurina* Shrubland	*Malosma laurina – Eriogonum cinereum*	G4S4	0.22	0
			Native Vegetation Communities Subtotal	*0.22*	*0*
Semi-Naturalized Vegetation Communities					
Upland Mustards or Star Thistle Fields	*Brassica nigra–Centaurea* (*solstitialis, melitensis*) Herbaceous	*Hirschfeldia incana*	GNA SNA	5.7	0.89
			Herbaceous Semi-Naturalized Vegetation Communities Subtotal	*5.7*	*0.89*
Disturbed and Developed Land Cover Types					
Urban/Developed	NA	NA	NA	0.38	0
Disturbed Habitat	NA	NA	NA	0.54	0.1

Table 1. Vegetation Communities and Land Cover Types in the Survey Area and Project Area

Vegetation Community or Land Cover Type	Alliance[1]	Association	Ranking[2]	Acreage within the Survey Area	Acreage within the Project Area
			Unvegetated Land Cover Types Subtotal	*0.92*	*0.1*
			Total	**6.84**	**0.99**

Notes:

[1] The term semi-natural is used in the Manual of California Vegetation to distinguish vegetation types dominated by non-native plants from natural vegetation communities (CNPS 2026).

[2] The conservation status of a vegetation community is designated by a number from 1 to 5, preceded by a letter reflecting the appropriate geographic scale of the assessment (G = global, S = subnational/state). The numbers have the following meaning (NatureServe 2025): 1 = critically imperiled; 2 = imperiled; 3 = vulnerable to extirpation or extinction; 4 = apparently secure; 5 = demonstrably widespread, abundant, and secure; NA = no applicable ranking

Upland Mustards or Star-thistle Fields

The upland mustards or star-thistle fields alliance features either black mustard (*Brassica nigra*), field mustard (*Brassica rapa*), Italian thistle (*Carduus pycnocephalus*), Geraldton carnation weed (*Euphorbia terracina*), shortpod mustard (*Hirschfeldia incana*), Dyer's woad (*Isatis tinctoria*), or cultivated radish (*Raphanus sativus*), among other similar ruderal forbs, as the dominant species in the herbaceous layer (CNPS 2026). Membership rules of this alliance indicate *Euphorbia terracina* or *Cynara cardunculus* > 50% relative cover in the herbaceous layer with other non-natives, including *Brassica nigra* and *Bromus diandrus* (CNPS 2026). One provisional association was mapped in the study area: *Hirschfeldia incana.* The entirety of the project site and the majority of the 100-foot survey area is characterized by this community, consisting of upland ruderal forbs as dominant in the herbaceous layer, and some shrubs are present at low cover. The habitat in the project area is dominated by invasive species including Geraldton carnation weed, Yellow Starthistle (*Centaurea solstitialis),* Black Mustard, Brome grasses (*Bromus* sp.), Yellow Sweetclover (*Melilotus indicus*), and Slender Wild Oat (*Avena barbata).* The association is not considered a sensitive vegetation community by CDFW (2026).

Laurel Sumac Scrub

The Laurel sumac scrub alliance features Laurel Sumac (*Malsoma laurina*) as the dominant or co-dominant shrub canopy with California Sagebrush (*Artemisia californica),* California brittlebrush (*Encelia californica),* Ashyleaf buckwheat *(Eriogonum cinereum)* and others. Membership rules of this alliance indicate *Malsoma laurina* is >50% or is >30% relative cover if co-dominant with California buckwheat (*Eriogonum fasciculatum)* or Black Sage (*Salvia mellifera)* in the shrub canopy (CNPS 2026). One provisional association was mapped in the study area: *Eriogonum cinereum.* This alliance was not mapped within the project area but was mapped within the 100-foot buffer survey area (Figure 4). Other species observed in this community in the survey area include: California sagebrush, California brittlebrush, Ashyleaf buckwheat and shortpod mustard. The association is not considered a sensitive vegetation community by CDFW (2026).

Disturbed Habitat
Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2026) or the Natural Communities List (CDFW 2026), disturbed habitat is described in Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). Disturbed habitat is described as areas generally lacking vegetation due to high levels of existing or historical human disturbance and are no longer recognizable as a native or naturalized vegetation association. Areas mapped as disturbed habitat may include unpaved roads, trails, and graded areas (Oberbauer et al. 2008). Vegetation in these areas, if present at all, is usually sparse and dominated by non-native weedy herbaceous species (Oberbauer et al. 2008). Areas mapped as disturbed habitat are associated with the project site entrance road (Figure 4). This land cover would not be considered sensitive by CDFW.

Urban/Developed
Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2026) or the Natural Communities List (CDFW 2026), urban/developed is described in Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). Urban/developed refers to areas that have been constructed on or disturbed so severely that native vegetation is no longer supported. Developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials. Areas mapped as urban/developed within the study area include the paved road that surrounds the project site (Figure 4). This land cover would not be considered sensitive by CDFW.

2.2 Special Status Species

2.2.1 Special Status Plants
Of the 55 plant species identified as in the general project vicinity based on desktop review in the BRA, one special status plant species, Malibu Baccharis (*Baccharis malibuensis*), with a California Rare Plant Rank (CRPR) status of 1B.1 (rare), has a moderate potential to occur. However, the site has been surveyed six times over the past year including surveys by qualified botanists, and this species was not detected during any of the surveys. Special status plants were not detected during the surveys and there is a low potential for their occurrence based on the historic and annual vegetation clearing of the site. It is possible that use of the site could result in temporary, indirect impacts to vegetation (and therefore special-status plant species) adjacent to the Project from dust. However, as described in the BRA, implementation of MM-BIO-1 would require a pre-work survey of grading and staging areas to delineate (with tape, fencing, etc.) the limits of disturbance for those activities, and to identify and mark any sensitive species to ensure avoidance. MM-BIO-4 would be implemented to avoid sensitive plants or facilitate transplanting for native species that are not federally or state-listed. With the implementation of these minimization measures, the construction of the proposed project is not expected to result in impacts to special-status plant species. BMP-4, BMP-5, BMP-6, and BMP-7 would ensure that indirect impacts to special-status plants beyond the construction area, if present, are avoided (See Appendix A for full list of Avoidance and Minimization Measures).

2.2.2 Nesting Birds & Raptors

The proposed project would require trimming of vegetation that provide potential nesting habitat for birds protected by the Migratory Bird Treaty Act, California Migratory Bird Protection Act, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be harmed. 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. To avoid impacts to active bird nests, eggs, or young, preconstruction nesting bird surveys will be required as described in the BRA under MM-BIO-1 and BMP-3.

2.2.3 Special Status Mammals

The San Diego Woodrat (*Neotoma lepida intermedia*) has a moderate potential to occur in the project area, with marginal habitat present on site due to routine vegetation maintenance. However, this species was not detected on the project site during multiple surveys. To avoid impacts to special status mammals, pre-work surveys, protection of special-status wildlife species, and biological monitoring (MM-BIO-1, MM-BIO-2, and MM-BIO-3) will be required as described in the BRA.

2.2.4 Special Status Reptiles

California legless lizard and Southern California legless lizard have a moderate potential to occur on site, and Coastal whiptail and coast horned lizard have a high potential to occur on site due to potentially suitable habitat on site. All four species are California species of special concern (SSC). However, the habitat on the project site consists of relatively compact soils and is heavily vegetated which likely reduces the potential for long term persistence on the site for California legless lizard, Southern California legless lizard, and coast horned lizard. Similarly, because coastal sage scrub communities occur near the project site there is a potential for Coastal whiptail to disperse across the site. None of these species were detected during multiple surveys of the project site. If present during project activities, these species could be harmed by construction equipment. If the species are observed in the project area, the CDFW regulations for development require fulfilment of measures to avoid impacts to them as per the following measures, as described in the BRA: pre-work surveys, protection of special-status wildlife species, and biological monitoring (MM-BIO-1, MM-BIO-2, and MM-BIO-3).

2.2.5 Special Status Insects

Crotch's Bumble Bee, American Bumble Bee, and Monarch Butterfly were identified as special status insects that have a high potential to occur on site due to potential forage plants on site. If present during project activities, these species could be harmed directly or indirectly by construction equipment. While the site has a high probability to support monarch breeding (i.e., not overwintering) populations of this species due to host plant narrowleaf milkweed being present (LADWP 2025), the site does not contain any suitable habitat (i.e. wind-protected tree groves) for overwintering populations of monarch butterfly which are the federally protected populations. Sporadic patches of narrowleaf milkweed were identified and mapped on site, but at very low coverage (<1%) in comparison to the non-native species, and the entire survey area is identified as the Upland Mustard or Star-thistle Fields Herbaceous Semi-Naturalized Alliance. Narrowleaf milkweed, a common species that does not have special status, is present in abundance among the Santa Monica Mountains as a whole, including within the same

LADWP-owned parcel outside of project activities less than 0.1 mile (mi) away, Corral Canyon Park which is 0.36 mi east, Solstice Canyon which is 0.4 mi northwest, and Bluffs Park which is 1.86 miles east (iNaturalist, 2026). The proposed critical habitat for the Monarch Butterfly is located across Alameda, Marin, Monterey, San Luis Obispo, Santa Barbara, Santa Cruz, and Ventura Counties and does not overlap with the project site (USFWS 2025b). Due to the site presenting poor overwintering habitat due to lack of significant perennial vegetation (such as eucalyptus trees) that could support these species during overwintering, potential impacts to protected overwintering populations (the federally protected populations) of this species are not expected. Crotch's Bumble Bee and American Bumble Bee are known from coastal areas of the City and forage widely across the region following seasonal plant expression. While these species prefers certain native species of plants, they are a generalist forager and use a wide variety of plants and habitat for foraging and nesting. Based on the surveys there did not appear to be a wide base of forage for the species but they can forage on non-native mustards when available. None of these species were detected during multiple surveys of the project site.

Prior to disturbance LADWP would implement MM-BIO-1 which requires preconstruction surveys within the disturbance limits for special-status wildlife species. Should individuals be located, no construction activity shall occur until the animals have left the area (MM-BIO-2). MM-BIO-3 requires a biological monitor to be present to ensure that sensitive species are avoided by construction crews should they enter the work area. MM-BIO-4 requires surveys for Crotch's bumblebee to determine presence/absence of this species, and to develop requirements for avoidance and minimization should this species be found.

3.0 ESHA Summary

3.1 LIP ESHA Guidance

As discussed in the LIP Section 4.3 ESHA Determination B.:

> *Unless there is site-specific evidence that establishes otherwise, the following habitat areas shall be considered to be ESHA:*
>
> 1. *Any habitat area that is rare or especially valuable from a local, regional, or statewide basis.*
> 2. *Any habitat area that contributes to the viability of plant or animal species that are designated or are candidates for listing as rare, threatened, or endangered under State or Federal law City of Malibu LCP Local Implementation Plan Adopted by the California Coastal Commission on September 13, 2002 Page 124.*
> 3. *Any habitat area that contributes to the viability of species that are designated "fully protected" or "species of special concern" under State law or regulations.*
> 4. *Any habitat area that contributes to the viability of species for which there is other compelling evidence of rarity, for example plant species eligible for state listing as demonstrated by their designation as "1b" (Rare or endangered in California and elsewhere) or designation as "2" (rare, threatened or*

endangered in California but more common elsewhere) by the California Native Plant Society,

5. *Any designated Area of Special Biological Significance, or Marine Protected Area.*
6. *Streams.*

A California Coastal Commission Memorandum (CCC 2003) was issued to provide details on the designation of ESHA in the Santa Monica Mountains in the context of the Malibu LCP. As described in the memo, the scientific background presented for ESHA Analysis in the Santa Monica Mountains was adapted from the Revised Findings for the Malibu LCP that the CCC adopted on February 6, 2003. The memo identified three important elements to the definition of ESHA: "First, a geographic area can be designated ESHA either because of the presence of individual species of plants or animals or because of a particular habitat. Second, in order for an area to be designated ESHA, the species or habitat must be either rare or it must be especially valuable. Finally, the area must be easily disturbed or degraded by human activities (CCC 2003)."

3.2 ESHA Assessment

Element 1 – is the habitat or species rare?
As described in section 2.1, the project site is comprised solely of a vegetation community entitled the Upland Mustards or Star-thistle Fields alliance. This habitat is dominated by non-native species and is not rare or considered sensitive by CDFW. No rare plants were identified on site. The area surrounding the project site is also not identified as rare or sensitive.

Element 2 – is the habitat or species especially valuable?
Areas may be valuable because of their "special nature," such as being an unusually pristine example of a habitat type, containing an unusual mix of species, supporting species at the edge of their range, or containing species with extreme variation. Habitats are generally considered valuable because of their special role in the ecosystem, and the Coastal Act requires that this role be "especially valuable." This test is met for relatively pristine areas that are integral parts of the Santa Monica Mountains ecosystem if they are demonstrably rare and extraordinarily special. The project site is largely dominated by non-native species that are not especially valuable to the Santa Monica Mountains ecosystem. There is a minimal composition of common native plants that can support native sensitive wildlife species of the area, however the project site is located within a much larger area that has abundant populations of the same common native plants. Use of the site by sensitive species has not been documented during multiple surveys of the project area. The habitat and species known for the surveyed project site would not be considered especially valuable.

Element 3 – would the area be easily disturbed or degraded by human activities and developments?
The area has been subject to regular vegetation maintenance on an annual basis for at least the last 35 years (Google 2026). Continuing human activities on the project site would not result in any significant disturbance or degradation of the site in its current state.

3.3 ESHA Determination

The City of Malibu LCP ESHA Overlay Map was created to identify the broad areas of ESHA in the City, and the project area is within LCP ESHA Overlay Map areas. Following completion of the biological surveys and assessment of the habitat known for the project area and the survey area, there was no habitat identified on site or in the survey area that would be deemed rare or especially valuable from a local, regional or statewide basis. As discussed in section 2.1, the vegetation communities are not identified as sensitive by CDFW (2026) and use of the site by sensitive wildlife has not been detected.

Section 2.2 provides a summary of special status plant and wildlife species impacts as described in the BRA (LADWP, 2025). As discussed, from the five surveys conducted over the course of a year, no special-status species (plant or wildlife) were identified on site. The BRA describes special status species that have some likelihood of occurrence on site due to habitat presence and recent occurrences near but outside of the project vicinity. While no special status species were detected, nevertheless there is some potential for these species to be present on site as periodic foragers or during dispersal. Therefore, a list of minimization measures and best management practices as discussed above, in the BRA, and in Appendix A below will be implemented to ensure that direct or indirect impacts to special status species are avoided.

Given the evidence of the biological surveys conducted in the area, this region that was previously identified as ESHA within the LCP ESHA Overlap Map does not meet the criteria for ESHA. Under LIP Section 4.3 ESHA Determination (c), if the applicant's site-specific biological study or other independent information contains evidence that an area previously shown on the ESHA overlay does not contain habitat that meets the definition of "environmentally sensitive area", the City shall determine the physical extent of habitat that does meet the definition of "environmentally sensitive area" on the project site.

Literature Cited

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Appendix A: Avoidance and Minimization Measures

As described in the Biological Resources Assessment (LADWP, 2025), the measures below will be implemented as part of the proposed operation and maintenance activities to avoid and minimize potential impacts to special-status species and habitats.

Mitigation / BMP	Description
MM-BIO 1 Pre-Work Surveys	A qualified biologist will conduct pre-work surveys within and adjacent to the proposed work area up to 10 days prior to the start of operation and maintenance activities. Pre-work surveys will include, but not limited to: (1) general surveys for botanical and wildlife resources; (2) work areas with flowing or standing water will be visually surveyed for any aquatic species that project activities may impact; and (3) infrastructure, equipment, etc. that may be used as nesting, roosting, or habitat refugia. If the qualified biologist does not find any non-listed or listed special-status species, then work may proceed.
MM-BIO 2 Protection of Listed Special-Status Wildlife Species	If listed special-status wildlife species are observed in the work area during the pre-work surveys, no work will occur until the individual has left the work area. If necessary, the appropriate regulatory agencies will be contacted about how best to proceed.
MM-BIO 3 Biological Monitoring	If the qualified biologist locates non-listed special-status species or other wildlife in the proposed work area during the pre-work surveys, the qualified biologist will determine, based on the type and location of work, what level (e.g., daily, weekly) of monitoring may be required. During monitoring, the qualified biologist will make every effort to keep the species out of harm's way to the extent feasible using one of the following methods: cease operation and maintenance activities until the individual leaves the area on its own; re-direct the individual out of the work area into suitable habitat; or capture and relocate the individual to suitable habitat outside the work area if the qualified biologist has the appropriate handling permit(s). If a listed special-status species is observed in the work area, all operation and maintenance activities will cease until the individual has voluntarily left the work area.
MM-BIO 4 Protection of Special-Status and Native Plants	All non-listed native plant species shall be avoided, if feasible. When not feasible, the plant may be salvaged and replanted in an area that will not be disturbed by operation and maintenance activities. If any federally- or state-listed listed plant species are observed in or near a work area, they will be avoided using an appropriate buffer and no operation and maintenance activities will occur within this buffer.
MM-BIO 5 Crotch's Bumble Bee	Before any vegetation is cleared or grading begins, a qualified biologist must conduct presence/absence surveys for Crotch's bumble bee to determine if they are present. The biologist shall search both the Project area and adjacent areas to search for foraging bees and underground nests. All survey findings, even if no bees are found, must be reported to the California Department of Fish and Wildlife (CDFW) prior to mobilization of construction crews to the Project area, including

	details about the survey conditions, the biologist(s) involved, physical environment, and a description of the potentially impacted habitat if a nest is found. If no Crotch's bumble bees or their nests are found, no further action is needed. However, if nests or potential nests are identified, a Crotch's bumble bee protection plan must be developed and approved by CDFW before any ground disturbance occurs. This plan will outline measures including timing restrictions for ground-disturbing activities (e.g., avoiding raking until from winter months to late March to protect overwintering queens), preconstruction survey requirements that must occur at least 30 days before work starts to find active nests, setting up avoidance buffers around nest sites, and restricting construction activities that could harm nests, biological monitoring during constriction. Any accidental "take" of the bumble bees or their nests is only permitted under specific CDFW authorizations.
MM-BIO 6 Night Work Restrictions	To minimize potential impacts on sensitive biological resources (e.g., nocturnal wildlife [including bats], migratory birds), adjacent residential areas (noise, light pollution), and worker safety, all construction and heavy equipment operation activities shall be restricted to daylight hours only. No work shall commence prior to twilight and all work shall cease by civil dusk, as defined by local sunrise/sunset tables. This restriction applies to all phases of the project, including vegetation clearing, grading, and construction. If emergency work is required or the project schedule necessitates temporary night work, prior written approval must be obtained from the appropriate regulatory agencies. Any approved night work shall implement additional specific mitigation measures, such as directional shielding of lights, noise reduction best management practices, and biological monitoring, as deemed necessary to minimize potential adverse effects.
BMP-1 Worker Environmental Awareness Training	A Worker Environmental Awareness Training will be provided to all on-site personnel (i.e., LADWP employees and contractors). Educational materials will be created and incorporated into a worker environmental awareness training for all project personnel working in the project area where sensitive habitats and/or species may be present. Educational materials will identify sensitive species and their habitat, discuss any specific measures to protect the species and their habitat, what to do if the species is observed, etc. Upon completion of the training, employees will sign a form stating they attended the program and understand all the protection measures. These forms will be filed at the worksite office.
BMP-2 Work Notification	Prior to the start of operation and maintenance activities, personnel will contact the Environmental Planning and Assessment Group (213-841-0750) to notify them of the proposed work. Environmental Planning and Assessment will be responsible for coordinating work with a qualified biologist. The qualified biologist will determine, based on the type and location of work, if a pre-work survey is required.
BMP-3 Nesting Bird Surveys and Nest Protection	LADWP will make every effort not to remove or otherwise disturb vegetation from February 1 to August 31. If work cannot be avoided during this period, a qualified biologist will conduct a nesting bird survey three days prior to the start of operation and maintenance activities. If an active nest is identified, the qualified biologist will establish a buffer of sufficient size around the nest based on existing conditions, including ambient noise, topography, and disturbance tolerance to avoid any

	negative impacts on the nesting bird(s). The nest site will be adequately marked such that personnel are aware of the buffer zone. The qualified biologist will take care not to mark the buffer in a way that would draw attention to the nest by potential predators. The qualified biologist will document the baseline behavior of the nesting bird(s) and monitor the behavior of the bird(s) to determine the efficacy of the buffer. If the qualified biologist determines that operation and maintenance activities may be impacting the bird(s), they will adjust the buffer accordingly. No work will occur in the buffer until the nest becomes inactive or the young have left the area.
BMP-4 Prevent the Introduction and Spread of Invasive Plants	LADWP will conduct operation and maintenance activities in a manner that prevents the introduction, transfer, and spread of invasive species, including plants, seeds, animals, and microbes from one project site and/or watershed to another. LADWP will implement applicable best management practices and guidelines for invasive plants as found on the California Invasive Plant Council's website.
BMP-5 Vehicle or Equipment Maintenance and Fueling.	Any equipment or vehicles driven and/or operated while conducting operation and maintenance activities will be checked regularly and maintained as needed to prevent leaks of materials that could impact special-status species and their habitat. No vehicle or equipment maintenance or fueling will be done in or near any waterway where petroleum products or other pollutants from the equipment could enter these areas in the case of a spill or leak.
BMP-6 Pollutants and Debris	No debris, soil, silt, sand, bark, slash, sawdust, trash, construction waste, cement or concrete washings, asphalt, paint, oil or other petroleum products, or any other substances which could be hazardous to aquatic life, or other organic or earthen material from operation and maintenance activities will be allowed to contaminate the soil and/or enter into or placed where it may be washed by rainfall or runoff into any stream, channel, culvert, or ditch.
BMP-7 Trash Abatement and Refuse Removal	Trash and food items will be contained in animal-proof containers and removed at the end of each workday to avoid attracting opportunistic predators such as common ravens, coyotes, and feral dogs.

Corral Canyon Staging Area

Environmentally Sensitive Habitat Area (ESHA) Assessment Addendum

Prepared by:

Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

July 2026

EXHIBIT 4

1. Purpose

At the request of the City of Malibu, this addendum has been prepared to analyze the Los Angeles Department of Water and Power (LADWP)'s proposed laydown area located at 4000 Corral Canyon Road in Malibu, California for Environmentally Sensitive Habitat Area (ESHA) as defined in the City of Malibu's Local Coastal Program (LCP) with respect to Section 4.3 ESHA Determination B (4):

> *"Any habitat area that contributes to the viability of species that are designated "fully protected" or "species of special concern" under State Law or regulations" and "Any habitat area that contributes to the viability of species for which there is other compelling evidence of rarity, for example plant species eligible for state listing as demonstrated by their designation as "1b" (rare or endangered in California and elsewhere) or designation as "2" (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society".*

This addendum supplements the March 2026 ESHA Memorandum in addition to the Biological Resources Assessment (BRA, LADWP, 2025) previously prepared to support the emergency Coastal Development Permit (eCDP) for the laydown area.

2. Background and Incorporated Assessments

The LADWP-owned Malibu property encompasses 97 acres in the Santa Monica Mountains Significant Ecological Area. Corral Canyon Road abuts the property and provides access to the site, located at approximately 4000 Corral Canyon Road. LADWP is proposing to use approximately one acre of the 97 acres for temporary laydown to support fire recovery efforts in the Pacific Palisades. Please refer to the BRA (LADWP, 2025) and the ESHA Memo (LADWP, 2026) for the project description, special status species analysis, vegetation community mapping, and ESHA analysis.

3. Environmentally Sensitive Habitat Area (ESHA) Investigation

The City of Malibu LCP provides protection for ESHA by restricting developments that occur on or near ESHA. The City of Malibu LCP ESHA Overlay Map was created to identify the broad areas of ESHA in the City, and the parcel has been mapped as within LCP ESHA Overlay Map areas. The City of Malibu LCP Local Implementation Plan (LIP) defines ESHA as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." ESHAs protected in the LIP include areas of native habitats such as woodland, coastal bluff, coastal sage scrub, and chaparral; and wetlands, streams, and riparian areas surrounding streams.

Although this region was previously mapped as ESHA within the LCP ESHA Overlay Map, the actual observations from the various biological surveys that have been

conducted led to the determination that the proposed area does not meet the criteria for ESHA.

The City of Malibu ESHA maps further discuss that “Boundaries of ESHA may change location over time due to varying circumstances. This map is not intended to depict fixed boundaries of ESHAs or marine resources and may not include al areas that are ESHA. This map does not establish any final boundary lines or constraints on the Commission’s ability to identify, map and regulate ESHAs and Marine Resources in the City of Malibu” (City of Malibu, 2002b). Under LIP Section 4.3 ESHA Determination (c), if the applicant’s site-specific biological study or other independent information contains evidence that an area previously shown on the ESHA overlay does not contain habitat that meets the definition of “environmentally sensitive area”, the City shall determine the physical extent of habitat that does meet the definition of “environmentally sensitive area” on the project site.

LIP Section 4.3 ESHA Determination B (4)

The City of Malibu has requested that LADWP evaluate the proposed laydown site with emphasis on LIP Section 4.3 ESHA Determination B (4) – see underlined language below.

> *Unless there is site-specific evidence that establishes otherwise, the following habitat areas shall be considered to be ESHA:*
>
> 1. *Any habitat area that is rare or especially valuable from a local, regional, or statewide basis.*
> 2. *Any habitat area that contributes to the viability of plant or animal species that are designated or are candidates for listing as rare, threatened, or endangered under State or Federal law City of Malibu LCP Local Implementation Plan Adopted by the California Coastal Commission on September 13, 2002 Page 124.*
> 3. *Any habitat area that contributes to the viability of species that are designated “fully protected” or “species of special concern” under State law or regulations.*
> 4. *Any habitat area that contributes to the viability of species for which there is other compelling evidence of rarity, for example plant species eligible for state listing as demonstrated by their designation as “1b” (Rare or endangered in California and elsewhere) or designation as “2” (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society,*
> 5. *Any designated Area of Special Biological Significance, or Marine Protected Area.*
> 6. *Streams.*

The following analysis refers to criteria set forth in LIP Section 4.3 ESHA Determination B (4).

The entirety of vegetation communities identified onsite have been assessed and determined to be common (i.e. not rare) under local, state and federal regulatory

agency metrics. Further, the area has been surveyed extensively and no special status species or habitat have been identified.

As described in the BRA and ESHA Memo, the site is largely dominated (>95%) by non-native, invasive weeds that do not provide quality habitat or forage for special status species known for the area. As depicted in Figures 1 and 2, the dominant plant species carnation spurge (*Euphorbia terracina)* is described by the California Invasive Plant Council (Cal-IPC) as a non-native invasive plant that produces toxic sap and has allelopathic properties that reduce germination of native plants (Cal-IPC 2026*).* The other dominant plant species on the site were all determined to be non-native and documented by the Cal-IPC as harmful to native habitat such as black mustard (*Brassica nigra*) and shortpod mustard (*Hirschfeldia incana*). The majority of plant species known from the project site and surrounding areas are exclusionary to native habitat and could be argued to be harmful in its continued presence for native plant and wildlife species. Nevertheless, there is still some potential of special status species to be present for periodic forage or dispersal in these non-native areas, irrespective of the lack of value of the vegetation on site. Therefore, avoidance and minimization measures were incorporated in an abundance of caution.



Figure 1. Picture captured on May 24, 2025 depicting the entrance. Dominant species include non-natives such as carnation spurge and mustard.

The BRA identifies a range of special status species that have some potential to occur on site due to certain general environmental conditions and proximity to known occurrences, however no special status species or habitat were observed on site during extensive surveys.



Figure 2. Picture captured on May 24, 2025 depicting the laydown site. Dominant species is non-native carnation spurge.

The BRA conservatively assigns avoidance and minimization measures to ensure that if any potential special status species are encountered, these measures would be implemented to ensure avoidance. Assigning avoidance and minimization measures is a common practice for work on a proposed site and does not confirm or indicate the presence of special status species on site.

The vegetation communities described in the ESHA Analysis Memo are known to be non-native, common, and not considered rare by California Department of Fish and Wildlife or the California Native Plant Society.

4. Water Resources or Riparian Areas

As discussed in the BRA, the National Wetlands Inventory (NWI) Wetlands Mapper documented riverine habitat (R4SBA) traveling through the center of the site for a span of approximately 50 feet. During the field surveys, the mapped area was located and investigated for field indicators of jurisdictional features. Within the area where the feature is mapped, no characteristics were detected that indicate this area supports significant hydrology (i.e., permanent, intermittent, or relatively permanent waters), and no hydric soils were identified. The area lacked evidence of flow features or concavity and also lacked any channel with a defined bed and bank. No hydric vegetation was detected within the mapped area, and the vegetation composition was consistent with the surrounding area and classified as “Upland.” Aerial imagery reviewed for this study shows that this area has been disced on a nearly annual basis within the Project area. Therefore, although this site was mapped as riverine, the field survey verified that the area is not an aquatic feature and therefore not jurisdictional.

No other jurisdictional features were mapped on the project site, and biological surveys did not detect any jurisdictional features on the project site.

5. Protected Trees and Shrubs

The proposed laydown area was surveyed for protected trees and shrubs under the Los Angeles County Ordinance and the City of Malibu. No oak (*Quercus* sp.), sycamore (*Platanus* sp.), alder (*Alnus* sp.), walnut (*Juglans* sp.) or toyon (*Heteromeles arbutifolia*) trees nor shrubs were observed on site.

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Los Angeles Department of Water & Power

BUILDING A STRONGER L.A.

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October 30, 2025

Ms. Yolanda Bundy
City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265

Dear Ms. Bundy:

Subject: Emergency Use Permitting – 4000 Corral Canyon Road
Corral Canyon Staging Area Project – Narrow Leaf Milkweed Seeding Plan

The Los Angeles Department of Water and Power (LADWP) hereby submits the enclosed Corral Canyon Staging Area Project – Narrow Leaf Milkweed Seeding Plan, prepared by Aspen Environmental Group, in support of the Emergency Use Permitting for the property located at 4000 Corral Canyon Road.

LADWP appreciates the continued coordination and support from the City of Malibu. The Department remains committed to complying with all applicable requirements related to the emergency permit.

Should you have any questions or require additional information, please contact me at (213) 367-0436.

Sincerely,

Katherine Rubin
Director of Corporate Environmental Affairs

KR:ar
Enclosure
c/enc: Ms. Courtney McCammon
Ms. Samantha Elias, City of Malibu

Corral Canyon Staging Area Project

Narrow Leaf Milkweed Seeding Plan

Prepared For:

Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Prepared by:

5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

October 2025

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1. Introduction

The 2025 Palisades Fire devastated large parts of Pacific Palisades, Topanga, and Malibu, burning 23,448 acres and destroying 6,837 structures. It was the most destructive fire in the history of the City of Los Angeles. In response to this fire, the Los Angeles Department of Water and Power (LADWP) emergency response team needs a site for emergency command staging, and they are focusing on LADWP lands near the burned areas, including the Corral Canyon property (Project Area), about 12 miles from Pacific Palisades.

The Project Area is classified as a monarch butterfly (*Danaus plexippus plexippus*) breeding habitat due to the presence of several narrow leaf milkweed (*Asclepias fascicularis*) plants that have been detected on prior biological surveys. Monarchs are known to be highly reliant on milkweed plants, as milkweed species (*Asclepias* sp.) are the only known hosts for monarch larvae, as well as a nectar source for adult monarch butterflies. The monarch butterfly, specifically the overwintering population referred to as *Danaus plexippus plexippus* (population 1), is currently proposed for listing under the federal Endangered Species Act and is included on the California Department of Fish and Wildlife Special Animals List.

To proceed with developing the site for emergency command staging, the City of Malibu requires a replacement seeding plan for milkweed plants to be removed by project activities. This plan details the replacement of narrow leaf milkweed plants, along with a monitoring plan to ensure that habitat within the Project Area is restored to pre-disturbance conditions, providing suitable habitat for monarch butterflies in the future.

1.1 Project Location

The LADWP-owned Malibu property covers 97 acres within the Santa Monica Mountains Significant Ecological Area. Less than two of the 97 acres of the property are proposed for use in the Project. The property is bordered mainly by scenic open space, with Solstice Canyon to the west, which is a popular hiking spot in the Santa Monica National Recreation Area, managed by the National Park Service. To the immediate east lies the Malibu Beach RV Park, a recreational area, and Corral Canyon, an undeveloped coastal canyon managed by the Mountains Recreation and Conservation Authority (MRCA) in partnership with the Santa Monica Mountains Conservancy. The Calamigos Beach Club and Pacific Coast Highway (PCH) are located just south of the property, with the Pacific Ocean beyond the PCH. To the north is the residential community of El Nido, often called the Malibu Hills. The site is undeveloped and consists primarily of disturbed coastal sage scrub, with non-native plant cover and minimal shrub cover, due to a 2018 burn.

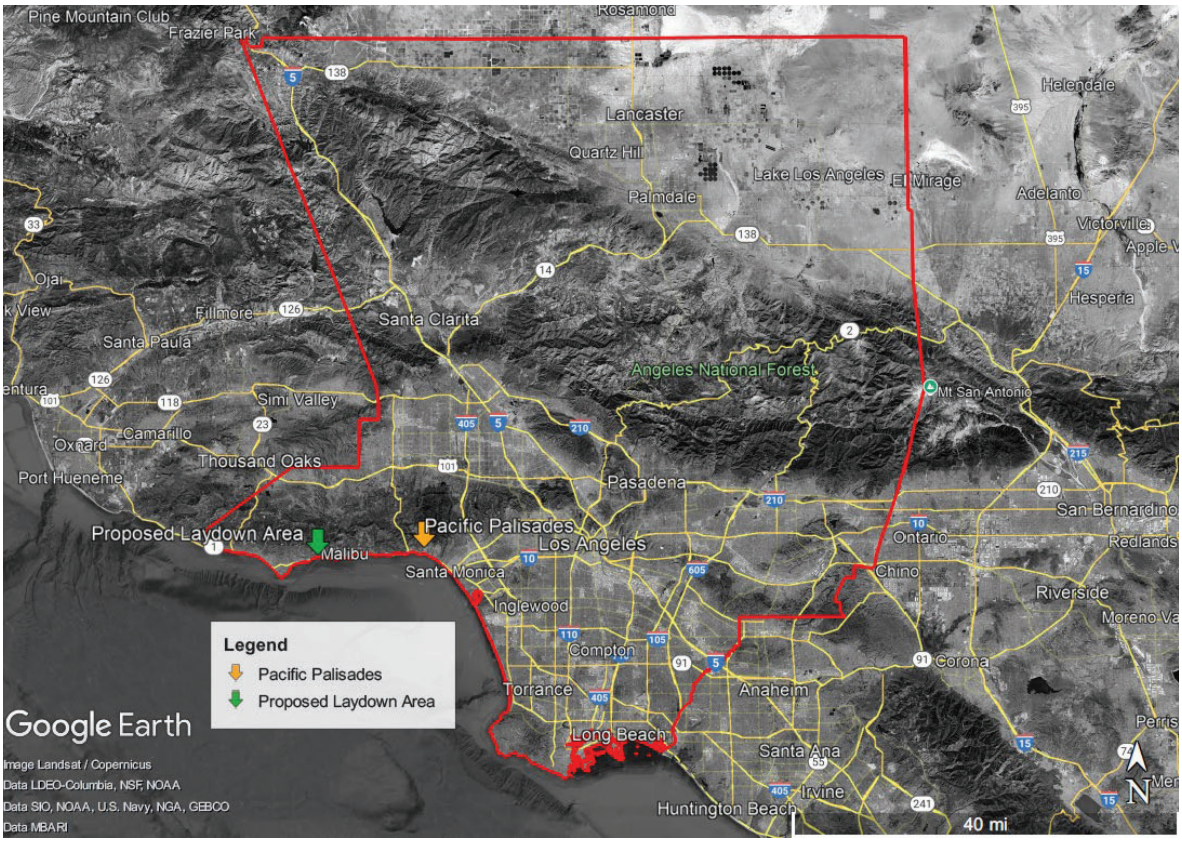


Figure 1. Regional Map



Figure 2. Laydown and Entrance

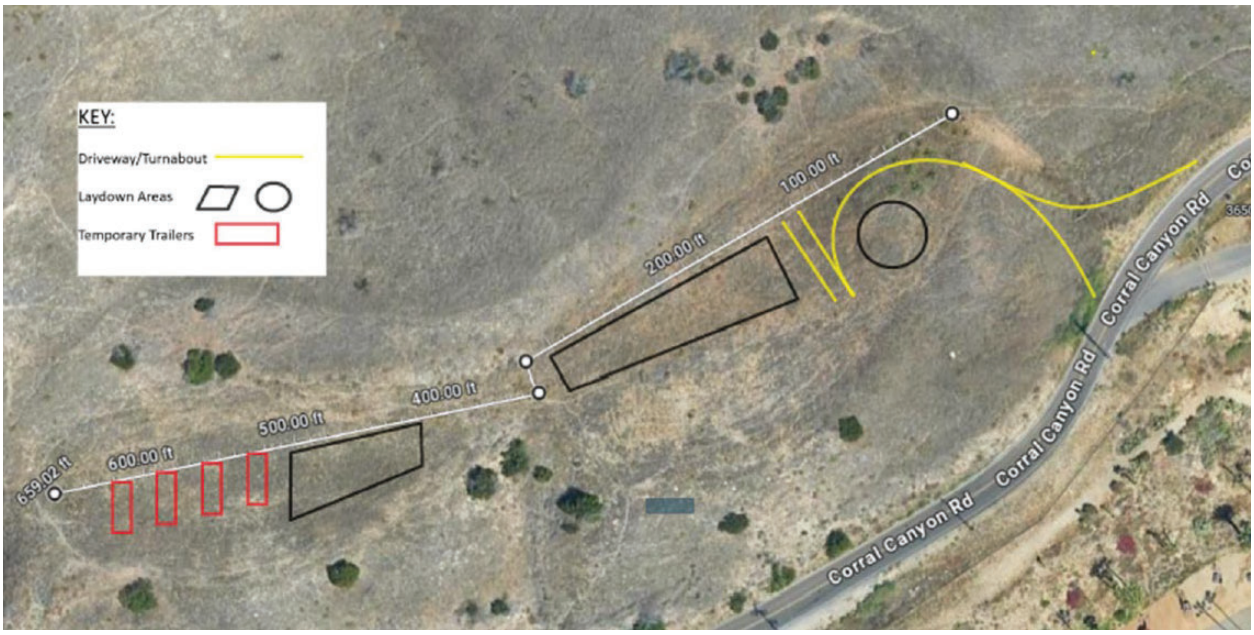


Figure 3. Proposed Laydown Areas

1.2 Purpose and Objectives

The purpose of this milkweed seeding plan is to restore the site to pre-project habitat conditions for supporting monarch populations. The plan will achieve this by implementing replacement seeding and then actively monitoring the resulting milkweed population against established success criteria.

1.2.1 Replacement

The goal of this plan is to replace milkweed plants lost or damaged during project activities at a minimum ratio of 1:1. A pre-construction survey of the Project Area determined that approximately 206 plants (observed as clusters or patches of stems) with approximately 628 live stems were located within the Project Area. As the preferred method is seeding, the number of seeds required for replacement shall exceed the number observed at the site to achieve the goals described in Section 3.2.1 below. The replacement goal is for restoration efforts to result in the establishment of 206 plants/clusters with at least 628 flowering stems.

1.2.2 Measured and Monitored Success Criteria

The overall goal of this project is to obtain a measure of success and ensure it is verifiable. Success Criteria are established for this project, with interim success criteria, to ensure the long-term persistence of reseeded populations. These success criteria, outlined in Section 5.4, shall be achieved through a combination of monitoring and recommendations (Section 5) as described in the plan, as well as the implementation of adaptive management (Section 7), if required to meet the metric goals. Including adaptive management will also allow strategies to be quickly modified in response to field observations or unexpected environmental conditions.

1.2.3 Habitat Function

The goal of this project is to restore functional habitat for monarch butterflies and other pollinators. This goal will be evaluated by monitoring monarch butterfly use during the breeding season, when both adult

and larval life stages may be present in the Project Area. Of note, during the pre-construction survey, monarch butterflies were observed within the Project Area. Methods for qualitatively evaluating monarch use of the Project Area as part of the monitoring efforts described in Section 5.2 of this plan. Additionally, to enhance monarch use of the site, "companion plants" may be optionally seeded within the Project area.

2. Methods

2.1 Site Preparation

2.1.1 Invasive Weed Control Requirements

The site is currently dominated by non-native plants, primarily *Euphorbia terracina* (also known as false caper), a non-native perennial herb included on the Cal-IPC list with a rating of Limited. Due to the greater than 30% relative cover of false caper, this plant has likely established a large seed bank at the project site; therefore, targeted treatment of this plant, along with others, is recommended before seeding treatments. Outlined below are methods recommended for removing this species and much of the non-native seed bank before seeding efforts. These methods are also recommended for use as needed to control invasive plant growth at the site during maintenance efforts.

Manual Removal (Mowing, String Trimming, and Hand-Pulling)

As a first-line treatment for site preparation, weed growth should be removed manually (mowing, string-trimming, or hand-pulling) to clear non-native vegetation at the project site. Manual methods should be used to remove non-native plant biomass within the Project Area, rather than herbicides, as herbicides may damage both milkweeds and monarchs. Plant biomass removed by manual methods shall not be left at the site and shall be disposed of off-site to prevent further infestations within the Project Area.

Thermal Weed Control (Soil Solarization) and/or Steam Weeding

To avoid impacts on monarch butterflies that may use the site, herbicides shall be avoided to the maximum extent feasible. As the seed bank is likely to be dominated by non-native plants, soil solarization or steam sterilization may also be utilized, in addition to manual removal methods, to achieve effective reduction in the viability of non-native seeds. Soil solarization is a technique that creates high soil temperatures through the placement of a clear, thin, tarp over wet soil for at least 4-8 weeks (Stapleton et al. 1986), which effectively damages seeds such that they may not sprout. Steam weeding is a relatively new method, which can also be used to reduce the viability of the non-native seed bank by the application of hot steam directly to wet soils, such that surface temperatures become 60-80 degrees (Melander et al. 2011), and commercial machines are available for this implementation, such as the Satusteam or Green Ninja Stealth.

2.1.2 Soil Scarification

As the soil in the Project Area may be variously compacted due to construction-related activities, it should be scarified or loosened before planting. Soil should be scarified through either the use of hand tools (e.g., plow, digging fork, hand tiller) or motorized equipment (e.g., chisel plow, ripper, rotary tiller). It is also recommended that ground-disturbing work be avoided in the planting area, including grading and heavy compaction, to the maximum extent possible throughout project-related activities.

2.1.3 Soil Amendments

Soil amendments should only be low-pollutant and organic substances, such as mycorrhizal inoculum, sphagnum peat, wood chips, and straw, and their use is at the discretion of the Revegetation Monitor. Care should be taken when choosing amendments, since many commercial agricultural soil amendments may contain high levels of chemicals that could harm habitats. All amendments employed must be certified weed- and pest-free.

2.2 Seed Collection and Sourcing

2.2.1 Local Phenotypes vs. Commercial Stock

The preferred approach is to collect seeds from narrow leaf milkweed plants with phenotypes locally adapted to the area's climate. To accomplish this, collection from local, on-site, or adjacent populations within 10-20 miles from the site, with similar elevation and soil type, is preferred. Ideally, seed pods that are just starting to turn brownish and split will be collected for processing.

Collecting locally minimizes the risk of outbreeding depression, ensuring the re-established population remains vigorous and adapted to specific microclimates. To ensure the long-term sustainability of the source populations, seed collection shall not exceed 10% of the available seeds from any individual patch or population. As narrow leaf milkweed is a relatively widespread species, collecting from local areas will help preserve the genetics of local milkweed populations. If local seeds are unavailable or insufficient in quantity, the use of nursery-grown stock from a reputable native seed supplier (e.g., S&S Seeds, Hedgerow Farms) and regionally appropriate provenance in Southern California may be considered as a necessary secondary option.

2.2.2 Seed handling

As described above, seeds may be obtained from either local field-collected or nursery stock. Seeds must be collected or ordered well before seeding, and therefore, proper seed storage and handling are crucial to success. If seeds are collected in the field, they will need to be processed and hulled from the coma (tuft of silky white hairs) before storage. Seeds shall be stored in cool, dry conditions until sowing. Cold stratification may also be required before planting to increase the germination rate.

2.2.3 Companion Seeding of Native Plants (Optional)

To improve the habitat suitability in the Project Area, additional plants are recommended for inclusion in a secondary seed mix to provide alternate nectar sources for monarch butterflies, with consideration of blooming times that may best support overwintering populations. Additionally, planting companion species will help outcompete non-native plants by supporting the soil micro-biome and providing a broader, more diverse range of nectar sources for wildlife. Species should include those that were observed on the site, as well as additional species that are known to occur in the immediate vicinity. These species are recommended to be hand-sown at the same time as narrow leaf milkweed. The quantity to be seeded for each species should be at the seeding rate of at least 20 pure live seeds per square foot, using the documented weight of seed per pound for that species provided by the actual seed supplier; however, estimates for seeding have been provided based on information on the Stover Seed website. The goal of including these species is to increase the native seed bank in the Project area, and they will not be monitored.

Table 1. Companion Seeding List

Species	Reason for inclusion	Blooming time[1]	Estimated Seeds/Lb.[2]	Quantity (Lbs./acre)	Lbs. of PLS for ~2 acres
California Aster (*Corethrogyne filaginifolia*)	Observed on-site, nectar source for fall/winter	July to November	940,000	0.05	0.10
Black sage (*Salvia mellifera*)	Observed nearby, an alternate nectar source for spring/summer.	March to June	600,000	0.07	0.14
California sagebrush (*Artemisia californica*)	Observed on-site, an alternate nectar source for spring/summer/fall.	August to November	6,000,000	0.01	0.02
Annual lupine (*Lupinus bicolor)*	Reported nearby and is an alternate nectar source for spring/summer; species in the pea family are good nitrogen fixers that are known to enhance soils.	March to June	115,000	0.38	0.76
Dove weed (*Croton setiger*)	Observed as an excellent pioneer species in recovering habitats; it may enhance soils.	May to October	45,000	0.97	1.94

Sources: [1] = Jepson Flora Project 2025, [2] = Stover Seed. 2025

2.3 Seeding

2.3.1 Timing

To ensure maximum viability, the Project Area must be seeded during the optimal window, which is fall or early winter, specifically between October 15th and December 15th. This timing is essential for utilizing natural precipitation and promoting the cold stratification necessary for germination. This natural process is favored as it generally yields a higher long-term germination rate. Should conditions prevent a fall/winter application, spring seeding, which must be completed prior to May 1st, is an acceptable alternative, provided the seeds undergo pre-stratification in a controlled environment for a minimum of 30-45 days at 40°F (4°C).

2.3.2 Seeding Methods and Considerations

Application shall be performed by broadcast seeding with a hand or mechanical spreader, followed by light raking or rolling to establish seed-to-soil contact. The raking or rolling must not bury the seed deeper than 1/4 inch (6 mm) to establish firm seed-to-soil contact while preventing excessive burial. Soil conditions must be sufficiently dry to avoid clumping during incorporation. Watering shall be done immediately after seeding to ensure seeds adhere to the soil.

2.3.3 Seeding Goal and Seeding Rate

The seeding goal for this project is to achieve successful germination and establishment in a direct 1:1 replacement ratio for the narrow leaf milkweed plants lost in the Project Area. Based on the pre-construction report, which documented 206 plants (or patches) with a total of 628 flowering stems, the minimum success target is the establishment of at least 206 new, viable milkweed patches within the site. To achieve this goal, the seeding rate for replacement will significantly exceed the current density in the Project Area, at a rate of at least 20 pure live seeds per square foot. Additionally, seeds will be certified as weed-free before use to ensure compliance with local, state, and federal seed requirements. It is

recommended that Revegetation Monitor be present during seeding activities to ensure that all areas receive sufficient revegetation treatments.

Table 2. Narrow Leaf Milkweed Recommended Seed Quantities

Species	Estimated Seeds/Pound[1]	Quantity (Lbs./acre)	Lbs. of PLS for ~2 acres
Narrow leaf milkweed (*Asclepias fascicularis*)	62,000	0.70	1.40
Total	**62,000**	**0.70**	**1.40**

Sources: [1] = Nabhan et al. 2015.

2.3.4 Supplemental Planting Methods

If the Restoration Monitor finds it necessary, supplemental planting with nursery stock is allowed. Container stock (plugs) can be used along with seeds during the initial project stages, if needed, to ensure plants establish and are replaced at a 1:1 ratio (206 plants) and may also be used at later stages if warranted. The Revegetation Monitor will determine the spacing of container plants, which should mimic the natural growth pattern of the vegetation community, avoiding rows or artificial geometric arrangements, so as not to impact the aesthetics of the vegetation community.

3. Maintenance and Weeding

3.1 Weeding Schedule

Weed control shall be conducted quarterly during the first two growing seasons to control invasive annual grasses and forbs. Methods used shall include those recommended in Section 2.1.1, Site Preparation (i.e., by mechanical, hand, or steam weeding). If additional visits are deemed necessary to control weeds at the site, the Restoration Monitor shall propose a new schedule for LADWP's approval.

3.2 Weed Abatement and Chemical Herbicide Avoidance

The use of weed control methods may be required to reduce the non-native seed bank, as required by the Performance/Success Criteria for the project. In general, chemical herbicides should be avoided near milkweed unless specifically targeted and approved by the Restoration Monitor. Should weed abatement be required to control weeds on the site, mechanical (mower or string trimmer) or hand-pulling methods should be prioritized. Herbicides used shall be limited to those approved for use by the County and applicable agencies.

3.3 Supplemental Irrigation

Supplemental watering shall occur at least once per month during establishment (first year); however, if rainfall occurs that produces at least one inch of rainfall in a given month, supplemental watering may be deemed unnecessary for that month at the direction of the Restoration Monitor. Any method (such as a water truck) may be used to irrigate seeded areas if rainfall is insufficient, and irrigation frequency may be adjusted in response to precipitation frequency and amount or in accordance with the recommendations of the Revegetation Monitor. Adequate rainfall and supplemental irrigation shall be assessed and documented by the Restoration Monitor and reported in the annual report (Section 6.1).

Water used for watering must be potable to avoid introducing unknown contaminants into the project area.

4. Monitoring

4.1 Frequency

Restoration Crews shall be monitored while performing plant installation and site preparation activities. The Restoration Monitor shall subsequently visit the site after 90 days to verify that seeds have begun sprouting and establishing. Subsequently, the Restoration Monitor shall visit the site twice annually (spring and late summer) for at least 3 years.

4.2 Quantitative Monitoring

Since the goal of this project is to replace narrow leaf milkweed plants at a 1:1 ratio, direct plant counts will be conducted. The goal of this project is to replace 206 plants/clusters with approximately 628 stems; therefore, the ideal method for measurement is to perform direct plant counts within the Project Area. Direct counts shall be used to measure survivorship, and the Project Area shall be surveyed by walking transects to count milkweed plants present within the Project Area. Since narrow leaf milkweed plants were observed to grow in large clusters of plants, it may not be possible to determine the separation between plants without excavation of a taproot; hence, both counts will be recorded (individual plants/clusters and flowering stems).

To evaluate the percent coverage of non-native plants in the Project Area, a quadrat method shall be used. At least 15 random plots shall be visually assessed for percent cover of non-native species, and the average percent cover of non-native species shall be calculated and evaluated against Performance/Success Criteria (see Section 4.5).

4.3 Qualitative Monitoring

4.3.1 Photo Documentation

Photo documentation shall be used to document the progress of plant establishment at the Project Site. Photos shall be included in the “As-built” monitoring report to track progress, clearly labeled with UTM coordinates and the nautical direction of each image, to enable replication on subsequent visits. No permanent stakes shall be placed in the field that may trip workers or pose a hazard to wildlife.

4.3.2 Monarch Use

During monitoring visits, the presence of monarch uses shall be documented. Documentation by reporting the numbers of eggs, larvae (including stage), pupae, adults, etc., observed within the site. Furthermore, all observations of early life stages must specify the milkweed species used by monarchs if another species emerges at the site other than narrow leaf milkweed. For adults, the activity type (e.g., nectaring, oviposition) and the nectar plant species being visited must be recorded. Mapping these specific observations, including hotspots within the Project Area or high-use plant species, is critical in determining effective adaptive strategies or where to concentrate future plantings to maximize reproductive success and resource availability.

4.3.3 Observations

General information regarding the status of the plant replacement efforts shall be recorded during site visits and included in reports. Qualitative information reported shall consist of, but will not be limited to, the following: plant phenology (seedling, flowering, fruiting), general health (if disease or pests are observable), stature, signs of reproduction (seeding), plant growth progress, disturbances or trash entering the site, erosion, relative success of management actions (such as if installing netting has helped reduce herbivory), and any other qualitative observation that may be provided. Also, additional notes on wildlife use of the site shall be made, such as the nectaring, flying/moving, perching/roosting, courtship displays, or nesting shall be recorded.

4.4 Performance/Success criteria

Performance/Success Criteria are as follows:

- Year 1: ≥30% germination/establishment of seeded milkweed. Less than 30% coverage of non-native plants.
- Year 2: ≥50% survivorship of established plants. Less than 30% coverage of non-native plants.
- Year 3: ≥70% survivorship and evidence of flowering/seed set. Less than 30% coverage of non-native plants.

4.5 Recommendations

Any actionable recommendations shall be included in each monitoring report. If any parameter included in this plan is not working well or failing in implementation based on the opinion of the Restoration Monitor, a recommendation shall be provided to optimize treatment(s) or to provide adaptive management methods (see Section 6). Recommendations shall be as detailed as feasible; for example, if seeds fail to sprout on the first visit, the report should clearly specify a specific number of replacement plantings to avoid ambiguity.

5. Reporting

5.1 As-built Report, Initial Establishment Memo, and Annual Reporting

Reports shall be prepared annually to document the progress of the revegetation activities at the project site. A total of five reports should be prepared to document progress of the revegetation activities, including: one monitoring report detailing the plant installation and site preparation conditions (As-built Report); one 90-day memo detailing any deficiencies in plantings that require immediate remedial actions or maintenance (Initial Establishment Memo); and three Annual Reports. Reports shall be prepared by the Revegetation Monitor and submitted to LADWP.

At minimum all reports shall include the following information: (1) introduction and background of the project, including the seeding requirements; (2) maps of reseeded areas (i.e., as-built map), (3) descriptions of work completed and proposed, including date of seeding start and estimated completion; (4) qualitative monitoring observations (general health, stature, signs of reproduction and growth), including observed use of the site by monarchs and photo documentation; (5) quantitative monitoring

results and progress toward conformance the Performance/Success Criteria; (6) discussion of remedial or maintenance actions recommended, including of any problems or challenges encountered.

6. Adaptive Management

Because local conditions aren't always predictable and new, better revegetation methods may emerge; this plan is intended to be a flexible guide rather than a rigid rulebook. Therefore, the project permits "Adaptive Management"—a concept defined by the USFWS as a method for testing different strategies, measuring results against biological goals, and then adjusting future conservation actions based on what is learned (USFWS 2000). This allowance for Adaptive Management is essential, as it enables the Restoration Monitor and crews to make informed decisions, implement more cost-effective strategies, and ultimately achieve the project's goals.

Adaptive Management strategies or measures are broadly defined as actions that enhance the project's success, such as adding supplemental seeding, supplemental planning, adjusting the irrigation schedule, increasing weed control, applying soil amendments, or implementing erosion control measures. While the plan anticipates that additional plantings may be needed to address deficiencies, adaptive management shall be required if the Restoration Monitor explicitly detects a problem that requires extending the plan beyond its scope. Explicitly, no Adaptive Management measure implemented should be less in scope (i.e., a reduction in acres of planting area or numbers of plants required) or reduce Success Criteria requirements than those described in the plan.

If any new adaptive management tool is used during implementation of the plan, outside the methods described in this plan, the Lead and Responsible agencies (LADWP and the City of Malibu) shall be contacted for approval or notification. A written description of the methods, or derivation of those included in this plan, and implementation schedule shall be included, appended to this plan, and maintained as part of the administrative records. Monitoring shall continue until success criteria are met for two consecutive years post-implementation of any new adaptive management tool that is established because the project has not met interim goals.

Any minor adjustments already accounted for in this plan, such as planting from late fall through spring, do not require approval. Ultimately, the Revegetation Monitor is responsible for recommending the necessary maintenance treatments to achieve the established project goals (the Performance/Success Criteria), and Restoration crews are then tasked with executing these maintenance activities as outlined in the plan. Adaptive management only refers to restoration treatments not already included in the plan.

7. References

Environmental Planning and Assessment, Los Angeles Department of Water and Power. 2025. Corral Canyon Staging Area Biological Resources Assessment.

Jepson Flora Project (eds.) 2025. Jepson eFlora. https://ucjeps.berkeley.edu/eflora/. Accessed on October 29, 2025.

Melander, B. and J. K. Kristensen. 2011. "Soil steaming effects on weed seedling emergence under the influence of soil type, soil moisture, soil structure and heat duration." Annals of Applied Biology, 158(2), 194-203.

Nabhan, G., S. Buckley, and H. Dial. 2015. Low end of seed weight according to the Xerces Society. Cited in Pollinator Plants of the Desert Southwest: Native Milkweeds (*Asclepias* spp.). USDA-Natural Resources Conservation Service, Tucson Plant Materials Center, Tucson, AZ. TN-PM-16-1-AZ. Available at: https://xerces.org/sites/default/files/2018-05/15-048_01_USDA-NRCS_NativeMilkweeds_Desert-Southwest_web.pdf

Stapleton, J. J. and J. E. DeVay, 1986. Soil Solarization: A Non-Chemical Approach for Management of Plant Pathogens and Pests. Crop Prot. 1986, 5, 190–198.

Stover Seed. 2025. https://www.stoverseed.com/native-seed-database-species-list Accessed on October 29, 2025.

USFWS (U.S. Fish and Wildlife Service). 2000. Notice of Availability of a Final Addendum to the Handbook for Habitat Conservation Planning and Incidental Take Permitting Process. Federal Register 65:35242-35257. Online: https://www.govinfo.gov/content/pkg/FR-2000-06-01/pdf/00-13553.pdf (1 Jun).

City of Malibu

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BIOLOGY REVIEW REFERRAL SHEET

TO: City of Malibu Biologist

FROM: City of Malibu Planning Department **REVISED DATE** 05/29/2026

PROJECT NUMBER: CDP 26-032

JOB ADDRESS: 4000 CORRAL CANYON RD

APPLICANT / CONTACT: Katherine Rubin, Los Angeles Department of Wate

APPLICANT EMAIL: katherine.rubin@ladwp.com

PLANNER: Samantha Elias

PROJECT DESCRIPTION: Follow-up CDP for temporary utility laydown yard for LADWP

REVISION:

TO: Malibu Planning Department and/or Applicant

FROM: City Biologist, Courtney McCammon

_____ **The project review package is INCOMPLETE and; CANNOT proceed through Final Planning Review until corrections and conditions from Biological Review are incorporated into the proposed project design** (See Attached).

X

_____ **The project is APPROVED, consistent with City Goals & Policies associated with the protection of biological resources and CAN proceed through the Planning process.**

Building Plan Check (BPC) Required ☐ Yes ☐ No BPC Fees Req'd $_____

_____ **The project may have the potential to significantly impact the following resources, either individually or cumulatively: Sensitive Species or Habitat, Watersheds, and/or Shoreline Resources and therefore Requires Review by the Environmental Review Board (ERB).**

Courtney McCammon 6/9/26

Signature Date

Additional requirements/conditions may be imposed upon review of plan revision

Contact Information:

Courtney McCammon, City Biologist, biology@malibucity.org, (310) 456-2489, extension 277

City of Malibu

Biology • Planning Department
23825 Stuart Ranch Road · Malibu, California · 90265-4861
Phone (310) 456-2489 · Fax (310) 456-3356 · www.malibucity.org

BIOLOGY REVIEW SHEET

PROJECT INFORMATION

Applicant: (name and email)	Katherine Rubin, Los Angeles Department of Wate katherine.rubin@ladwp.com		
Project Address:	**4000 CORRAL CANYON RD** Malibu, CA 90265		
Planning Case No.:	CDP 26-032		
Project Description:	Follow-up CDP for temporary utility laydown yard for LADWP		
Date of Review:	June 9, 2026		
Reviewer:	Courtney McCammon	Signature:	Courtney McCammon
Contact Information:	Phone: (310) 456-2489 ext 277	Email:	biology@malibucity.org

SUBMITTAL INFORMATION

Site Plan:	5/29/26
Site Survey:	5/29/26
Landscape Plan:	
Hydrozone Plan:	
Irrigation Plan:	
Fuel Modification Plan:	
Grading Plan:	5/29/26
OWTS Plan:	
Bio Assessment:	July 2025 (LADWP), revised March 2026
Bio Inventory:	
Native Tree Survey:	
Native Tree Protection Plan:	
Miscellaneous:	
Previous Reviews:	5/14/26 (Incomplete)

REVIEW FINDINGS

Review Status:	☐	**INCOMPLETE**: Additional information and/or a response to the listed review comments is required.
	☒	**APPROVED**: The project has been approved with regards to biological impacts.
	☐	**CANNNOT APPROVE AS SUBMITTED**: The proposed project does not conform to the requirements of the MMC and/or LCP.
	☐	**ERB**: This project has the potential to impact ESHA and may require review by the Environmental Review Board pursuant to LIP Section 4.4.4

Recycled Paper

DISCUSSION:

1. The site and the surrounding 100-foot buffer are mapped as ESHA on the City of Malibu GIS. There are also several mapped streams. However, the submitted biological assessment states:

   "Following completion of the biological surveys and assessment of the habitat known for the project area and the survey area, there was no habitat identified on site or in the survey area that would be deemed rare or especially valuable from a local, regional or statewide basis…. Given the evidence of the biological surveys conducted in the area, this region that was previously identified as ESHA within the LCP ESHA Overlap Map does not meet the criteria for ESHA."

   Therefore, the site does not contain ESHA or streams and is in compliance with Chapter 4 of the Malibu LIP.

2. There are no native protected trees on site. Therefore, the project is in compliance with Chapter 5 of the LIP.

RECOMMENDATIONS:

1. The project is recommended for **APPROVAL** with the following conditions:

   A. Each of the Avoidance and Mitigation Measures in Appendix A of the submitted biological assessment shall be implemented. Any reports from subsequent surveys shall be submitted for review and approval. The reseeding of narrowleaf milkweed will be completed and a subsequent report will be submitted for review and approval.

   B. No new landscaping is proposed with this project. Therefore, none is approved. Should the applicant intend to plant any new vegetation with a potential to exceed six feet in height, or change 500/2,500 square feet or more (new residence/existing residence) of the existing landscaping area, a detailed landscape plan shall be submitted for review and approval prior to any planting.

   C. Grading/excavation/vegetation removal scheduled between February 1 - September 15 will require nesting bird surveys by a qualified biologist prior to initiation of such activities. Surveys shall be completed no more than five days from proposed initiation of site preparation activities. Should active nests be identified, a buffer area no less than 150 feet (300 feet for raptors) shall be fenced off until it is determined by a qualified biologist that the nest is no longer active. A report discussing the results of the surveys shall be turned in to the City within two business days of completion of surveys.

   D. Construction fencing shall be placed and indicated on the site plan. Construction fencing shall be installed prior to the beginning of construction and shall be maintained throughout the construction period to protect the site's sensitive habitat areas.

   E. All new development including structures, septic systems, or landscaping, shall be set back no less than (*100*) feet from the (*ESHA*).

-o0o-

If you have any questions regarding the above requirements, please contact the City Biologist office at your earliest convenience.

cc: Planning Project file
Planning Department

City of Malibu

23825 Stuart Ranch Rd., Malibu, California CA 90265-4861
(310) 456-2489 FAX (310) 456-7650

PUBLIC WORKS REVIEW
REFERRAL SHEET

TO: Public Works Department

FROM: City of Malibu Planning Department **REVISED DATE** 05/29/2026

PROJECT NUMBER:	CDP 26-032
JOB ADDRESS:	4000 CORRAL CANYON RD
APPLICANT / CONTACT:	Katherine Rubin, Los Angeles Department of Water
APPLICANT EMAIL:	katherine.rubin@ladwp.com
PROJECT DESCRIPTION:	Follow-up CDP for temporary utility laydown yard for LADWP
REVISION:	

TO: Malibu Planning Department and/or Applicant

FROM: Public Works Department

_____ **The following items described on the attached memorandum shall be addressed and resubmitted.**

x **The project was reviewed and found to be in conformance with the City's Public Works and LCP policies and CAN proceed through the Planning process.**

Building Plan Check (BPC) Required ❑Yes ❑No BPC Fees Req'd $_____

SIGNATURE

06/22/2026
DATE

ANY WORK IN THE CITY'S ROW SHALL BE COORDINATED WITH THE PUBLIC WORKS INSPECTORS.

City of Malibu

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(310) 456-2489 • Fax (310) 456-3356 • www.malibucity.org

GEOTECHNICAL REVIEW SHEET

Project Information

Date: June 9, 2026		**Review Log #:**	**5432**
Site Address:	4000 Corral Canyon Road		
Lot/Tract/PM #:		**Planning #:**	**CDP 26-032 P1** Ref: ECDP 25-017
Applicant/Contact:	Katherine Rubin, Director of Corporate Environmental Affairs, LADWP katherine.rubin@ladwp.com,	**BPC/GPC #:**	
Contact Phone #:	(213) 367-0436 **Fax #:**	**Planner:**	**Samantha Elias**
Project Type:	Emergency laydown yard for LADWP, containing storage containers and electrical/mechanical, equipment. Site will be covered with 20,900 sq. ft. of aggregate base and approximately 1,600 ft of fencing.		

Submittal Information

Consultant(s) / Report Date(s): *(Current submittal(s) in **Bold**.)*	Los Angeles Department of Water and Power, Geology/Geotechnical Group (Yan, GE 2554; Larios CEG 2579): **5-28-2026**, 11-24-2025 (revised), 11-20-2025, 11-13-2025 Ref: Professional Geotechnical Consultants (Masterman, GE 567; Schock, CEG 1300): 4-19-2023, 9-5-2019, Western Laboratories (Juge, RCE 9597): 8-28-1978, 4-13-1976, 7-30-1975, 1-18-1973 Emil DiMatteo (CEG 374): 6-9-1976 Geoplan, Inc. (Merrill, CEG 83): 7-1-1996, 8-26-1993 **1st CDP Submittal** **Site plan prepared by City of Los Angeles Department of Water and Power sheet U002-SA2 (no date).** Letter requesting Emergency Use Permit prepared by Katherine Rubin, Los Angeles Department of Water and Power dated September 5, 2025.
Previous Reviews:	None; Ref: 3-18-2026, 11-25-2025, 11-17-2025, 9-19-2025 for ECDP 25-017)

Coastal Development Permit Review Findings

Coastal Development Permit Review

☒ The project plans and report(s) are **ACCEPTABLE** from a geotechnical perspective. Please review the attached 'Geotechnical Notes for Building Plan Check' and incorporate into Building Plan-Check submittals.

☐ The project plans and report(s) are **NOT ACCEPTABLE** from a geotechnical perspective. The listed 'Planning Stage Review Comments shall be addressed prior to acceptance.

Project submittals were reviewed from a geotechnical perspective for conformance with applicable codes,

guidelines, and standards of practice, including the following current City adopted standards:

- City of Malibu Local Coastal Program – Land Use Plan and Local Implementation Plan (LCP-LUP and LCP-LIP)
- Malibu Municipal Code – Title 15, *Buildings and Construction*
- City of Malibu *Guidelines for the Preparation of Engineering Geology and Geotechnical Engineering Reports and Procedures for Report Submittal* (November 2013) referred to herein as "Geotechnical Guidelines"

In the case of conflicting requirements between the Geotechnical Guidelines and any other referenced standards, the latest standard will apply. The Applicant is responsible for complying with the submittal requirements for all Planning regulations, as appropriate; any questions regarding Planning regulations or interpretations should be directed to the case Planner.

This review is limited to the proposed scope of work as described in the Project Type section above. All other geologic or geotechnical issues concerning the subject property are outside of the scope of this review.

Remarks

The referenced geotechnical report update and site plan, as well as the files for the ECDP, have been reviewed by the City's consulting reviewers from a geotechnical perspective. The follow-up CDP was submitted with revisions. The revised project includes grading to widen an existing dirt road entrance to the site from approximately 16-feet to 50 to 30-feet wide, and fine grading to create a 16-foot-wide access road, oriented east-west across the existing flat pad onsite. Three laydown areas are proposed with eight (8) trailers, six non-habitable 8 ft by 20 ft material storage trailers and two office trailers, as well as six porta-potties on the western side of the site. According to the project description provided to Planning, approximately 20,900 sq ft. of aggregate base is proposed to cover the site, likely spread out over the laydown and road areas. Fencing is proposed around the entire material storage site (fence type not specified, presumably chain link). The site is proposed to be in use for up to 7 4-years, based on discussions with representatives from the Los Angeles Department of Water and Power and the updated scope of the project for the follow-up CDP provided to the City.

This project and site was discussed with LADWP in a meeting on June 26, 2025 wherein it was noted that this site was in the middle of large landslide as mapped and documented by the California Geological Survey in their report *Landslide Hazard Mapping for Selected California, Highway Corridors, Phase 2Ualifornia Geological Survey Special Report 243, Chapter 8: Landslide Hazards Along Route 1 between Santa Monica and Oxnard* (2017). See links below and page 253 of this report under section **Highway Segment C: Malibu Canyon to Escondido Canyon, PM 46.8 to 51.8,** paragraph 3 "RV Park" slide.

https://maps.conservation.ca.gov/cgs/lsi/

https://www.conservation.ca.gov/cgs/documents/publications/special-reports/sr_243/SR_243-ch-8-sans-Plates.pdf

Eagle View aerial photo link keyed to RV Park APN:
https://egis3.gis.lacounty.gov/ipa_s/?apn=4459008003

This landslide is classified by CGS as "dormant young," which is defined as landslides with landforms that are relatively young but with no record of historic movement. The landslide underlies the entire proposed laydown site, and the entire south facing slope above and below Corral Canyon Road. This road is the only access to about 100 homes in Los Angeles County in the hills above the site, and the Malibu Beach RV Park at 25801 Pacific Coast Highway is located on the southeast lobe of the landslide. Reports prepared for the fire rebuild project at the Malibu Beach RV Park in 2019 and 2023 (see references) documented mapping of cracks in the asphalt of Corral Canyon Road above the RV park in 2023 and interpreted them as being due to creep of the underlying fill and colluvium, and not the result of landslide reactivation

(Geotechnical Design Consultants, April 19, 2023). However, the undersigned reviewer (and other geotechnical reviewers for the City, Christopher Dean, CEG and Michael B Phipps, CEG) note that during 1998 and 2005, they personally observed tension cracks at the margins of the landslide congruent with creep movement of the landslide during years of high rainfall. There is no record of remedial stabilization measures for this landslide.

The geologic site characterization and the static and pseudo-static slope stability analysis presented by LADWP was intended to satisfy the applicable sections of Los Angeles County Building Code Section 110. LADWP geotechnical staff modeled the existing slope stability condition of the landslide and compared it to the proposed slope stability condition of the landslide including the proposed work. The existing and proposed factors of safety were evaluated using under lower bound and upper bound material parameters. The results of the analysis indicate that the proposed grading (which will be permanent) and the loading from materials storage (temporary) will have an insignificant effect on the stability of the landslide, relatively speaking, under static and pseudo-static load conditions. The revised report dated November 24, 2025, provides a code-conforming finding in accordance with Los Angeles County Code Section 110.2.1.

Planning Stage Conditions of Approval:

1. The LADWP geotechnical professionals confirmed that the previous SSA included the November 2025 reports included the additional loading of the 4 additional trailers, and that the SSA demonstrated a negligible effect on the stability of the landslide. Therefore, the Section 110 statement in the November 24, 2025, report still applies to the updated project as proposed. Although the structures are temporary, the Building Official may require an Assumption of Risk and Release may be required be recorded prior to permitting.
2. The proposed monitoring plan shall be included as notes and details on the grading and drainage plan. The monitoring plan may include any or all of the following suggested by LADWP: procedures for visual observation by qualified personnel, installation of instrumentation or other monitoring devices to detect movement or vibration onsite with defined alarm thresholds, and an action plan to respond to detected movement or vibration alarms or after potentially triggering seismic or hydrological events occur. NOTE: The reviewed plan set incorporates these notes.

Please direct questions regarding this review sheet to the City's Geotechnical consultants listed below.

Geotechnical Engineering Review by: _____ 6-9-2026

Lauren J. Doyel, G.E. #2981, Exp. 6-30-27 Date
Geotechnical Engineering Reviewer (805-370-8710)
Email: ldoyel@malibucity.org

Engineering Geology Review by: _____ 6-9-2026

Christopher Dean, C.E.G. #1751, Exp. 9-30-26 Date
Engineering Geology Reviewer (408-656-3210)
Email: cdean@malibucity.org

This review was prepared by representatives of Cotton, Shires and Associates, Inc., as an agent of the City of Malibu.

COTTON, SHIRES AND ASSOCIATES, INC.
CONSULTING ENGINEERS AND GEOLOGISTS

City of Malibu

– GEOTECHNICAL –

NOTES FOR BUILDING PLAN-CHECK

The following standard items should be incorporated into Building Plan-Check submittals, as appropriate:

Not Applicable.

From: **Frank Angel** [redacted]
Date: Wed, Jun 17, 2026 at 11:47 AM
Subject: RE: Major Grading Operation on DWP property on Corral Canyon Road across from Malibu RV Park
To: Bruce Silverstein [redacted]
Cc: Steve Uhring [redacted] >, John Mazza [redacted]

Bruce,

Not at all. Please include the pics I sent. I would actually like to meet with the city manager and CDD director. The ECDP must be rescinded, work stopped and a restoration plan submitted because the ECDP was based on incomplete and inadequate information (to put it euphemistically). If the planning commission and city council weren't notified of the issuance of this ECDP, that, too, violates LIP chapter 13.

Meanwhile, after I emailed you, a source provided me the attached notice-of-decision document. (While I tried to receive answers for weeks now, neither Tyler nor the CDD Director offered it.)

As I emailed Tyler in response to an email I received from him yesterday (his email and my response also attached), his email raises more questions than it answers, e.g., regarding the gross misuse of a below-the-radar ECDP (no emergency was proven, and none exists), the absence of any CEQA review, not to mention the flippant decision by the contracted city biologist striking the ESHA from the LCP map and neglecting to refer the project to the ERB. I had not heard about this project from Tyler until yesterday. And never from Yolanda Bundy. If this site isn't ESHA, then there is no ESHA anywhere in the city. A hell of a precedent. And once again, the city biologist didn't bother to do a single field inspection. There is no independent city review of an applicant's biological assessment any longer, unlike when Marti Witter served as city biologist, which is the very purpose of having a city biologist. McCammon is setting the city up for a practice and pattern lawsuit. She systematically rubber-stamps what an applicant submits -- it's a desktop box-checkoff, as you'll see in a notice of decision attachment. Then why do we have a city biologist?

I begin to suspect this isn't the first misuse of an ECDP to bypass public hearings before the harm is done. This is so disturbing on so many levels.

Many thanks for your attention to this!

Frank P. Angel | O (310) 314-6433 | C (310) 924-1416

2601 Ocean Park Blvd., Suite 205, Santa Monica, CA 90405

Angel Law

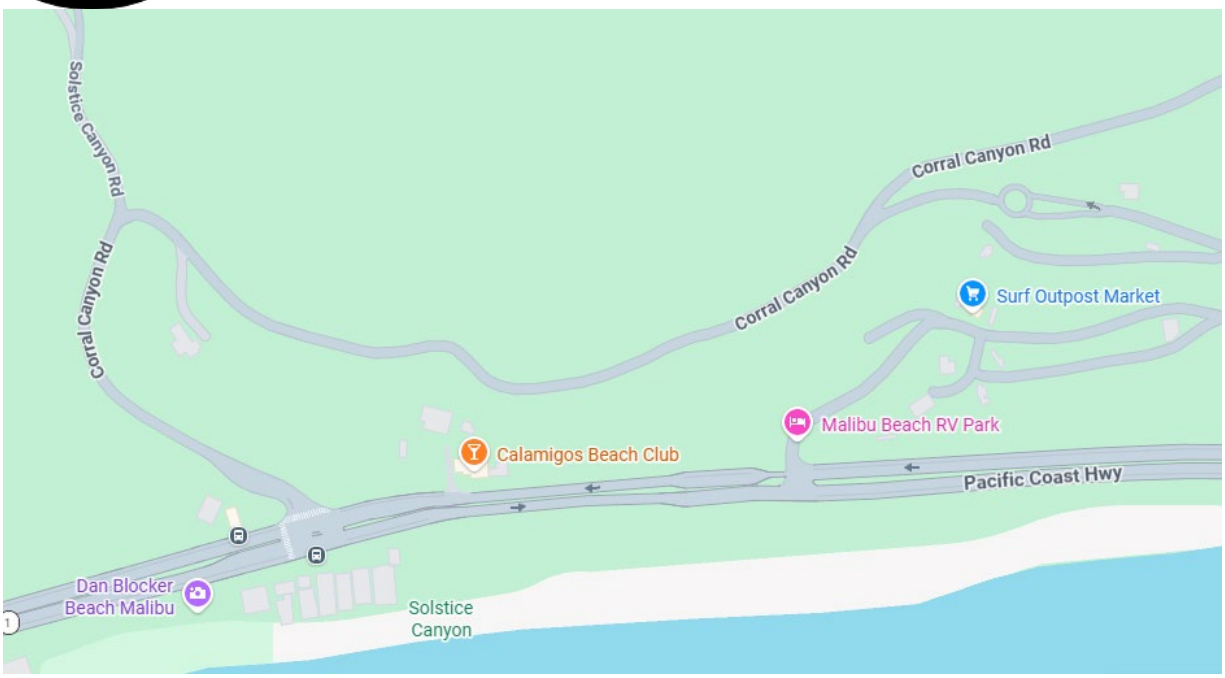
angellaw.com

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From: Bruce Silverstein [redacted]
Sent: Wednesday, June 17, 2026 10:52 AM
To: Frank Angel [redacted]
Cc: Steve Uhring [redacted] John Mazza [redacted]
Subject: Re: Major Grading Operation on DWP property on Corral Canyon Road across from Malibu RV Park

Do you mind if I share your emails with the City Manager?

On Mon, Jun 15, 2026 at 11:17 PM Frank Angel [redacted] wrote:

> Bruce,
>
> It's an operation conducted by the City of Los Angeles's Department of Water and Power, as you can see from one of the pics I sent earlier (showing one of their trucks). There are many workers on this site every day.
>
> And, yes, totally within city limits, way below the Sequit line. It's near the bottom of the coastal terrace, immediately above the Malibu Beach RV Park, on the north side of Corral Canyon Road. See black oval on this Google map screenshot (not to scale nor reflecting actual dimensions but indicating general location). The leveling and denuding of the native vegetation extends over a length of more than five hundred feet in my estimation and a variable width, with mounds of earth stockpiled on that site. I have more pictures.
>
> If not *the* most destructive, extensive grading project in the city's history since its incorporation, it surely figures among them. John Mazza tells me this project, whatever it is, has not come before the planning commission for a CDP or any other permit!
>
> Who is responsible for this disaster within the City Hall bureaucracy? How is this possible?
>
> [redacted]
>
> 
>

Frank P. Angel | O (310) 314-6433 | C (310) 924-1416

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Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

From: Bruce Silverstein [redacted]
Sent: Monday, June 15, 2026 8:07 PM
To: Frank Angel [redacted]
Cc: Steve Uhring [redacted] John Mazza [redacted]
Subject: Re: Major Grading Operation on DWP property on Corral Canyon Road across from Malibu RV Park

L.A. "City" ? Or County?

Is this within the city limits of Malibu?

On Mon, Jun 15, 2026 at 6:21 PM Frank Angel [redacted] wrote:

> This FYI. Are you aware of this ESHA massacre? The first and last pics are from Corral Canyon Road across from the RV park, where L.A.city graded a road into it's property—the site of a long since abandoned nuclear power plant project.
>
> Frank P. Angel (he/him/his)
>
> (c) 310-924-1416
>
> (o) 310-314-6433
>
> @FrankPAngel1
>
> www.angellaw.com
>
> Sent from my
>
> Begin forwarded message:
>
> > **From:** Frank Ange [redacted]
> > **Date:** June 15, 2026 at 6:16:05 PM PDT
> > **To:** Tyler Eaton <teaton@malibucity.org>
> > **Subject: Major Grading Operation on DWP property on Corral Canyon Road across from Malibu RV Park**
> >
> > Hi Tyler,
> >
> > Following up on my voicemail an earlier this month, below are some pictures from today of this DWP project I mentioned to you. I have no clue what this project is, and have not received or seen any notice of any CDP or other permit.
> >
> > This operation has created significant resource damage in LCP-designated, undisturbed ESHA.
> >
> > What permits, if any has the city issued, and what environmental review, if any, has been performed for this project?
> > Is the city aware of this operation? And if so, is the city inspecting it?
> >
> > I look forward to hearing from you at your very earliest opportunity. Please call me back. We're not talking about a minor home remodel project here.
> >
> > Best,
> >
> > [IMG_1809.jpeg]

[IMG_1810.jpeg]

[IMG_1821.jpeg]

[IMG_1829.jpeg]

Frank P. Angel (he/him/his)

(c) 310-924-1416
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Sent from my