FINAL

PROGR AMMATIC ENVIRONMENTAL IMPACT REPORT/
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
FOR THE
LOS ANGELES RIVER REVITALIZATION MASTER PLAN

VOLUME II

Prepared by
The City of Los Angeles
Department of Public Works
Bureau of Engineering

and the
US Army Corps of Engineers
Los Angeles District
Planning Division

With technical assistance from
Tetra Tech, Inc.

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# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>ES-1</td>
</tr>
<tr>
<td>1. INTRODUCTION</td>
<td>1-1</td>
</tr>
<tr>
<td>1.1 Introduction</td>
<td>1-1</td>
</tr>
<tr>
<td>1.2 Project Background, Purpose, and Need</td>
<td>1-2</td>
</tr>
<tr>
<td>1.3 Project Goals and Objectives</td>
<td>1-3</td>
</tr>
<tr>
<td>1.4 Document Overview</td>
<td>1-3</td>
</tr>
<tr>
<td>1.5 PEIR/PEIS Approach to Evaluating Environmental Impacts</td>
<td>1-6</td>
</tr>
<tr>
<td>1.6 Intended Uses of this PEIR/PEIS</td>
<td>1-6</td>
</tr>
<tr>
<td>1.7 Environmental Review Guidelines</td>
<td>1-7</td>
</tr>
<tr>
<td>1.7.1 California Environmental Quality Act</td>
<td>1-7</td>
</tr>
<tr>
<td>1.7.2 National Environmental Policy Act</td>
<td>1-8</td>
</tr>
<tr>
<td>1.8 Public Involvement in PEIR/PEIS</td>
<td>1-9</td>
</tr>
<tr>
<td>1.8.1 Overview</td>
<td>1-9</td>
</tr>
<tr>
<td>1.8.2 Scoping</td>
<td>1-9</td>
</tr>
<tr>
<td>1.8.3 Public Review of Draft PEIR/PEIS</td>
<td>1-11</td>
</tr>
<tr>
<td>1.9 Relationship to Other Projects and Programs and Previous Relevant Studies</td>
<td>1-11</td>
</tr>
<tr>
<td>1.10 Organization of this PEIR/PEIS</td>
<td>1-14</td>
</tr>
<tr>
<td>2. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES</td>
<td>2-1</td>
</tr>
<tr>
<td>2.1 Introduction</td>
<td>2-1</td>
</tr>
<tr>
<td>2.2 Physical Modifications to the River Channel</td>
<td>2-3</td>
</tr>
<tr>
<td>2.2.1 Introduction</td>
<td>2-3</td>
</tr>
<tr>
<td>2.2.2 River Channel Modifications Without Reduction in River Flow Velocity</td>
<td>2-3</td>
</tr>
<tr>
<td>2.2.3 River Channel Modifications With Reduction in River Flow Velocity</td>
<td>2-3</td>
</tr>
<tr>
<td>2.3 Open Space Development</td>
<td>2-4</td>
</tr>
<tr>
<td>2.3.1 Introduction</td>
<td>2-4</td>
</tr>
<tr>
<td>2.3.2 Parks</td>
<td>2-5</td>
</tr>
<tr>
<td>2.3.3 Green Streets</td>
<td>2-7</td>
</tr>
<tr>
<td>2.3.4 Paseos and Promenades</td>
<td>2-8</td>
</tr>
<tr>
<td>2.3.5 Trails, Paths, and Bikeways</td>
<td>2-9</td>
</tr>
<tr>
<td>2.3.6 Pedestrian River Crossings and Bridge Underpasses</td>
<td>2-10</td>
</tr>
<tr>
<td>2.3.7 River Loops</td>
<td>2-11</td>
</tr>
<tr>
<td>2.3.8 Gateways</td>
<td>2-13</td>
</tr>
<tr>
<td>2.3.9 Water Quality and Habitat</td>
<td>2-13</td>
</tr>
<tr>
<td>2.4 The Five Opportunity Areas</td>
<td>2-14</td>
</tr>
<tr>
<td>2.4.1 Introduction</td>
<td>2-14</td>
</tr>
<tr>
<td>2.4.2 Canoga Park Opportunity Area</td>
<td>2-16</td>
</tr>
<tr>
<td>2.4.3 River Glen Opportunity Area</td>
<td>2-22</td>
</tr>
<tr>
<td>2.4.4 Taylor Yard Opportunity Area</td>
<td>2-28</td>
</tr>
<tr>
<td>2.4.5 Chinatown-Cornfields Opportunity Area</td>
<td>2-32</td>
</tr>
<tr>
<td>2.4.6 Downtown Industrial Opportunity Area</td>
<td>2-37</td>
</tr>
<tr>
<td>2.5 Revitalization Management</td>
<td>2-43</td>
</tr>
<tr>
<td>2.5.1 Introduction</td>
<td>2-43</td>
</tr>
<tr>
<td>2.5.2 River Authority</td>
<td>2-43</td>
</tr>
<tr>
<td>2.5.3 Revitalization Corporation</td>
<td>2-43</td>
</tr>
<tr>
<td>Section</td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>2.5.4 River Foundation .................................................</td>
<td>2-44</td>
</tr>
<tr>
<td>2.5.5 Revitalization Management Tools ...............................</td>
<td>2-44</td>
</tr>
<tr>
<td>2.6 Alternatives Evaluated in this PEIR/PEIS ......................</td>
<td>2-45</td>
</tr>
<tr>
<td>2.6.1 Summary of Alternatives Evaluated in this PEIR/PEIS .........</td>
<td>2-45</td>
</tr>
<tr>
<td>2.6.2 No Project Alternative .............................................</td>
<td>2-45</td>
</tr>
<tr>
<td>2.6.3 Environmentally Superior Alternative ........................</td>
<td>2-46</td>
</tr>
<tr>
<td>2.7 Alternatives Considered but Not Evaluated in This PEIR/PEIS</td>
<td>2-46</td>
</tr>
<tr>
<td>3. AFFECTED ENVIRONMENT ..................................................</td>
<td>3-1</td>
</tr>
<tr>
<td>3.1 Introduction ..................................................................</td>
<td>3-1</td>
</tr>
<tr>
<td>3.2 Agricultural Resources ..............................................</td>
<td>3-2</td>
</tr>
<tr>
<td>3.2.1 General Resource Description ....................................</td>
<td>3-2</td>
</tr>
<tr>
<td>3.2.2 Affected Environment ..............................................</td>
<td>3-3</td>
</tr>
<tr>
<td>3.3 Air Quality .....................................................................</td>
<td>3-5</td>
</tr>
<tr>
<td>3.3.1 Air Quality Standards .............................................</td>
<td>3-5</td>
</tr>
<tr>
<td>3.3.2 Air Quality Conditions in Project Area .......................</td>
<td>3-5</td>
</tr>
<tr>
<td>3.4 Geology, Soils, Climate, and Seismic Hazards ..................</td>
<td>3-9</td>
</tr>
<tr>
<td>3.4.1 General Resource Description ....................................</td>
<td>3-9</td>
</tr>
<tr>
<td>3.4.2 Affected Environment ..............................................</td>
<td>3-15</td>
</tr>
<tr>
<td>3.5 Hydrology, Floodplains, and Water Quality .................</td>
<td>3-19</td>
</tr>
<tr>
<td>3.5.1 General Resource Description ....................................</td>
<td>3-19</td>
</tr>
<tr>
<td>3.5.2 Affected Environment ..............................................</td>
<td>3-31</td>
</tr>
<tr>
<td>3.6 Mineral Resources ..................................................</td>
<td>3-33</td>
</tr>
<tr>
<td>3.6.1 General Resource Description ....................................</td>
<td>3-33</td>
</tr>
<tr>
<td>3.6.2 Affected Environment ..............................................</td>
<td>3-33</td>
</tr>
<tr>
<td>3.7 Biological Resources ................................................</td>
<td>3-35</td>
</tr>
<tr>
<td>3.7.1 General Resource Description ....................................</td>
<td>3-35</td>
</tr>
<tr>
<td>3.7.2 Affected Environment ..............................................</td>
<td>3-41</td>
</tr>
<tr>
<td>3.8 Land Use .......................................................................</td>
<td>3-50</td>
</tr>
<tr>
<td>3.8.1 General Resource Description ....................................</td>
<td>3-50</td>
</tr>
<tr>
<td>3.8.2 Affected Environment ..............................................</td>
<td>3-50</td>
</tr>
<tr>
<td>3.9 Recreation .....................................................................</td>
<td>3-76</td>
</tr>
<tr>
<td>3.9.1 General Resource Description ....................................</td>
<td>3-76</td>
</tr>
<tr>
<td>3.9.2 Affected Environment ..............................................</td>
<td>3-76</td>
</tr>
<tr>
<td>3.10 Noise ...........................................................................</td>
<td>3-96</td>
</tr>
<tr>
<td>3.10.1 Noise Terminology and Regulations ............................</td>
<td>3-96</td>
</tr>
<tr>
<td>3.10.2 Affected Environment ..............................................</td>
<td>3-98</td>
</tr>
<tr>
<td>3.11 Public Health and Safety ...........................................</td>
<td>3-99</td>
</tr>
<tr>
<td>3.11.1 General Resource Description ....................................</td>
<td>3-99</td>
</tr>
<tr>
<td>3.11.2 Affected Environment ..............................................</td>
<td>3-99</td>
</tr>
<tr>
<td>3.12 Transportation ........................................................</td>
<td>3-106</td>
</tr>
<tr>
<td>3.12.1 Affected Environment ..............................................</td>
<td>3-106</td>
</tr>
<tr>
<td>3.13 Utilities and Infrastructure ..........................................</td>
<td>3-121</td>
</tr>
<tr>
<td>3.13.1 General Resource Description ....................................</td>
<td>3-121</td>
</tr>
<tr>
<td>3.13.2 Affected Environment ..............................................</td>
<td>3-123</td>
</tr>
<tr>
<td>3.14 Socioeconomics ........................................................</td>
<td>3-127</td>
</tr>
</tbody>
</table>
### Table of Contents (continued)

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.14.1</td>
<td>Affected Environment</td>
</tr>
<tr>
<td>3.15</td>
<td>Environmental Justice</td>
</tr>
<tr>
<td>3.15.1</td>
<td>Relevant Executive Orders</td>
</tr>
<tr>
<td>3.15.2</td>
<td>Affected Environment</td>
</tr>
<tr>
<td>3.16</td>
<td>Cultural and Paleontological Resources</td>
</tr>
<tr>
<td>3.16.1</td>
<td>General Resource Description</td>
</tr>
<tr>
<td>3.16.2</td>
<td>Affected Environment</td>
</tr>
<tr>
<td>3.17</td>
<td>Aesthetic Resources</td>
</tr>
<tr>
<td>3.17.1</td>
<td>General Resource Description</td>
</tr>
<tr>
<td>3.17.2</td>
<td>Affected Environment</td>
</tr>
</tbody>
</table>

#### 4. Environmental Impacts and Mitigation

| 4.1    | Introduction | 4-1 |
| 4.2    | Agricultural Resources | 4-3 |
| 4.2.1  | Introduction | 4-3 |
| 4.2.2  | Potential Impacts Associated with LARRMP River Channel and Open Space Development Measures in the River Corridor | 4-4 |
| 4.2.3  | Potential Impacts in Opportunity Areas | 4-5 |
| 4.2.4  | No Project Alternative | 4-5 |
| 4.3    | Air Quality | 4-6 |
| 4.3.1  | Introduction | 4-6 |
| 4.3.2  | Potential Air Quality Impacts Associated with River Channel Modification and Open Space Development Measures in the River Corridor | 4-7 |
| 4.3.3  | Canoga Park Opportunity Area | 4-9 |
| 4.3.4  | River Glen Opportunity Area | 4-10 |
| 4.3.5  | Taylor Yard Opportunity Area | 4-11 |
| 4.3.6  | Chinatown-Cornfields Opportunity Area | 4-12 |
| 4.3.7  | Downtown Industrial Opportunity Area | 4-13 |
| 4.3.8  | No Project Alternative | 4-14 |

| 4.4    | Geology, Soils, and Seismic Hazards | 4-15 |
| 4.4.1  | Introduction | 4-15 |
| 4.4.2  | Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor | 4-17 |
| 4.4.3  | Canoga Park Opportunity Area | 4-19 |
| 4.4.4  | River Glen Opportunity Area | 4-20 |
| 4.4.5  | Taylor Yard Opportunity Area | 4-21 |
| 4.4.6  | Chinatown-Cornfields Opportunity Area | 4-22 |
| 4.4.7  | Downtown Industrial Opportunity Area | 4-23 |
| 4.4.8  | Mitigation Actions and Best Management Practices | 4-24 |
| 4.4.9  | No Project Alternative | 4-25 |

<p>| 4.5    | Hydrology, Floodplain, and Water Quality | 4-26 |
| 4.5.1  | Introduction | 4-26 |
| 4.5.2  | Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor | 4-29 |
| 4.5.3  | Canoga Park Opportunity Area | 4-31 |
| 4.5.4  | River Glen Opportunity Area | 4-33 |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.5.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.5.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.5.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.5.8</td>
<td>Mitigation Actions and Best Management Practices</td>
</tr>
<tr>
<td>4.5.9</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.6</td>
<td>Mineral Resources</td>
</tr>
<tr>
<td>4.6.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.6.2</td>
<td>Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.6.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.6.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.6.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.6.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.6.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.6.8</td>
<td>Mitigation Actions—Best Management Practices</td>
</tr>
<tr>
<td>4.6.9</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.7</td>
<td>Biological Resources</td>
</tr>
<tr>
<td>4.7.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.7.2</td>
<td>Potential Impacts Associated with River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.7.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.7.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.7.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.7.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.7.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.7.8</td>
<td>Potential Mitigation Actions and Best Management Practices</td>
</tr>
<tr>
<td>4.8</td>
<td>Land Use</td>
</tr>
<tr>
<td>4.8.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.8.2</td>
<td>Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.8.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.8.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.8.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.8.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.8.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.8.8</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.9</td>
<td>Recreation</td>
</tr>
<tr>
<td>4.9.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.9.2</td>
<td>Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.9.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.9.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.9.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.9.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.9.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.9.8</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>Section</td>
<td>Page</td>
</tr>
<tr>
<td>---------</td>
<td>------</td>
</tr>
<tr>
<td>4.10 Noise</td>
<td>4-113</td>
</tr>
<tr>
<td>4.10.1 Introduction</td>
<td>4-113</td>
</tr>
<tr>
<td>4.10.2 Potential Noise Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
<td>4-113</td>
</tr>
<tr>
<td>4.10.3 Canoga Park Opportunity Area</td>
<td>4-113</td>
</tr>
<tr>
<td>4.10.4 River Glen Opportunity Area</td>
<td>4-114</td>
</tr>
<tr>
<td>4.10.5 Taylor Yard Opportunity Area</td>
<td>4-115</td>
</tr>
<tr>
<td>4.10.6 Chinatown-Cornfields Opportunity Area</td>
<td>4-116</td>
</tr>
<tr>
<td>4.10.7 Downtown Industrial Opportunity Area</td>
<td>4-117</td>
</tr>
<tr>
<td>4.10.8 No Project Alternative</td>
<td>4-118</td>
</tr>
<tr>
<td>4.11 Public Health and Safety</td>
<td>4-119</td>
</tr>
<tr>
<td>4.11.1 Introduction</td>
<td>4-119</td>
</tr>
<tr>
<td>4.11.2 Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
<td>4-121</td>
</tr>
<tr>
<td>4.11.3 Canoga Park Opportunity Area</td>
<td>4-124</td>
</tr>
<tr>
<td>4.11.4 River Glen Opportunity Area</td>
<td>4-126</td>
</tr>
<tr>
<td>4.11.5 Taylor Yard Opportunity Area</td>
<td>4-128</td>
</tr>
<tr>
<td>4.11.6 Chinatown-Cornfields Opportunity Area</td>
<td>4-131</td>
</tr>
<tr>
<td>4.11.7 Downtown Industrial Opportunity Area</td>
<td>4-133</td>
</tr>
<tr>
<td>4.11.8 No Project Alternative</td>
<td>4-135</td>
</tr>
<tr>
<td>4.12 Transportation</td>
<td>4-136</td>
</tr>
<tr>
<td>4.12.1 Introduction</td>
<td>4-136</td>
</tr>
<tr>
<td>4.12.2 Potential Transportation Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
<td>4-140</td>
</tr>
<tr>
<td>4.12.3 Canoga Park Opportunity Area</td>
<td>4-140</td>
</tr>
<tr>
<td>4.12.4 River Glen Opportunity Area</td>
<td>4-141</td>
</tr>
<tr>
<td>4.12.5 Taylor Yard Opportunity Area</td>
<td>4-143</td>
</tr>
<tr>
<td>4.12.6 Chinatown-Cornfields Opportunity Area</td>
<td>4-143</td>
</tr>
<tr>
<td>4.12.7 Downtown Industrial Opportunity Area</td>
<td>4-144</td>
</tr>
<tr>
<td>4.12.8 Mitigation Actions</td>
<td>4-146</td>
</tr>
<tr>
<td>4.12.9 No Project Alternative</td>
<td>4-147</td>
</tr>
<tr>
<td>4.13 Utilities and Infrastructure</td>
<td>4-149</td>
</tr>
<tr>
<td>4.13.1 Introduction</td>
<td>4-149</td>
</tr>
<tr>
<td>4.13.2 Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
<td>4-150</td>
</tr>
<tr>
<td>4.13.3 Canoga Park Opportunity Area</td>
<td>4-150</td>
</tr>
<tr>
<td>4.13.4 River Glen Opportunity Area</td>
<td>4-152</td>
</tr>
<tr>
<td>4.13.5 Taylor Yard Opportunity Area</td>
<td>4-152</td>
</tr>
<tr>
<td>4.13.6 Chinatown-Cornfields Opportunity Area</td>
<td>4-153</td>
</tr>
<tr>
<td>4.13.7 Downtown Industrial Opportunity Area</td>
<td>4-154</td>
</tr>
<tr>
<td>4.13.8 Mitigation Actions/Best Management Practices</td>
<td>4-156</td>
</tr>
<tr>
<td>4.13.9 No Project Alternative</td>
<td>4-157</td>
</tr>
<tr>
<td>4.14 Socioeconomics</td>
<td>4-158</td>
</tr>
<tr>
<td>4.14.1 Introduction</td>
<td>4-158</td>
</tr>
<tr>
<td>Section</td>
<td>Page</td>
</tr>
<tr>
<td>---------</td>
<td>------</td>
</tr>
<tr>
<td>4.14.2</td>
<td>Potential Impacts Associated with LARRMP Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.14.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.14.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.14.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.14.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.14.7</td>
<td>Downtown Industrial Area Opportunity Area</td>
</tr>
<tr>
<td>4.14.8</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.15</td>
<td>Environmental Justice</td>
</tr>
<tr>
<td>4.15.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.15.2</td>
<td>Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.15.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.15.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.15.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.15.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.15.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.15.8</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.16</td>
<td>Cultural Resources</td>
</tr>
<tr>
<td>4.16.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.16.2</td>
<td>Potential Impacts Associated with LARRMP River Channel Modification and Open Space Development Measures in the River Corridor</td>
</tr>
<tr>
<td>4.16.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.16.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.16.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.16.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.16.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.16.8</td>
<td>Mitigation Actions and Best Management Practices</td>
</tr>
<tr>
<td>4.16.9</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.17</td>
<td>Aesthetic Resources</td>
</tr>
<tr>
<td>4.17.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4.17.2</td>
<td>Potential Impacts Associated with LARRMP Revitalization Measures in the River Corridor</td>
</tr>
<tr>
<td>4.17.3</td>
<td>Canoga Park Opportunity Area</td>
</tr>
<tr>
<td>4.17.4</td>
<td>River Glen Opportunity Area</td>
</tr>
<tr>
<td>4.17.5</td>
<td>Taylor Yard Opportunity Area</td>
</tr>
<tr>
<td>4.17.6</td>
<td>Chinatown-Cornfields Opportunity Area</td>
</tr>
<tr>
<td>4.17.7</td>
<td>Downtown Industrial Opportunity Area</td>
</tr>
<tr>
<td>4.17.8</td>
<td>Mitigation Actions/Best Management Practices</td>
</tr>
<tr>
<td>4.17.9</td>
<td>No Project Alternative</td>
</tr>
<tr>
<td>4.18</td>
<td>Cumulative Projects and Impacts</td>
</tr>
<tr>
<td>4.18.1</td>
<td>Cumulative Trends and Projects</td>
</tr>
<tr>
<td>4.18.2</td>
<td>Cumulative Impacts</td>
</tr>
<tr>
<td>4.19</td>
<td>Summary of Potential Impacts and Mitigation</td>
</tr>
<tr>
<td>5.</td>
<td>ENVIRONMENTAL COMPLIANCE AND COORDINATION</td>
</tr>
<tr>
<td>Section</td>
<td>Title</td>
</tr>
<tr>
<td>---------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>5.1</td>
<td>Applicable Regulations and Guidelines</td>
</tr>
<tr>
<td>5.2</td>
<td>Other Required Analysis</td>
</tr>
<tr>
<td>5.2.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>5.2.2</td>
<td>Growth-Inducing Impacts</td>
</tr>
<tr>
<td>5.2.3</td>
<td>Relationship Between Local Short-Term Uses of the Environment and</td>
</tr>
<tr>
<td></td>
<td>Long-Term Productivity</td>
</tr>
<tr>
<td>5.2.4</td>
<td>Irreversible or Irretrievable Commitments of Resources</td>
</tr>
<tr>
<td>5.2.5</td>
<td>Unavoidable Significant Adverse Impacts</td>
</tr>
<tr>
<td>6.</td>
<td><strong>List of Preparers and Persons Consulted</strong></td>
</tr>
<tr>
<td>6.1</td>
<td>List of Preparers</td>
</tr>
<tr>
<td>6.2</td>
<td>List of Persons Consulted</td>
</tr>
<tr>
<td>6.2.1</td>
<td>Federal Agencies</td>
</tr>
<tr>
<td>6.2.2</td>
<td>State Agencies</td>
</tr>
<tr>
<td>6.2.3</td>
<td>Local Agencies</td>
</tr>
<tr>
<td>7.</td>
<td><strong>References</strong></td>
</tr>
</tbody>
</table>
LIST OF FIGURES

<table>
<thead>
<tr>
<th>Figure</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Figure 1-1</td>
<td>River Corridor</td>
<td>1-5</td>
</tr>
<tr>
<td>Figure 2-1</td>
<td>River Corridor</td>
<td>2-2</td>
</tr>
<tr>
<td>Figure 2-2</td>
<td>Culvert Conveyance within Right of Way</td>
<td>2-4</td>
</tr>
<tr>
<td>Figure 2-3a</td>
<td>Riverfront Park Example</td>
<td>2-6</td>
</tr>
<tr>
<td>Figure 2-3b</td>
<td>Linear Park Example</td>
<td>2-6</td>
</tr>
<tr>
<td>Figure 2-3c</td>
<td>Pocket Park Example</td>
<td>2-6</td>
</tr>
<tr>
<td>Figure 2-3d</td>
<td>Recreation Field Example</td>
<td>2-7</td>
</tr>
<tr>
<td>Figure 2-3e</td>
<td>Traffic Calming Roundabout</td>
<td>2-7</td>
</tr>
<tr>
<td>Figure 2-4a</td>
<td>Local Green Street Example</td>
<td>2-8</td>
</tr>
<tr>
<td>Figure 2-4b</td>
<td>Arterial Green Street Example</td>
<td>2-8</td>
</tr>
<tr>
<td>Figure 2-5a</td>
<td>Promenade Example</td>
<td>2-9</td>
</tr>
<tr>
<td>Figure 2-5b</td>
<td>Paseo Example</td>
<td>2-9</td>
</tr>
<tr>
<td>Figure 2-6a</td>
<td>Trails Example</td>
<td>2-10</td>
</tr>
<tr>
<td>Figure 2-6b</td>
<td>Paths and Bikeways Example</td>
<td>2-10</td>
</tr>
<tr>
<td>Figure 2-7a</td>
<td>Pedestrian Bridge Example</td>
<td>2-10</td>
</tr>
<tr>
<td>Figure 2-7b</td>
<td>Typical Pedestrian Bridges</td>
<td>2-11</td>
</tr>
<tr>
<td>Figure 2-8</td>
<td>River Loops</td>
<td>2-12</td>
</tr>
<tr>
<td>Figure 2-9a</td>
<td>Regional Gateway Example</td>
<td>2-13</td>
</tr>
<tr>
<td>Figure 2-9b</td>
<td>Neighborhood Gateway Example</td>
<td>2-13</td>
</tr>
<tr>
<td>Figure 2-10a</td>
<td>Native Vegetation and Open Space Example</td>
<td>2-14</td>
</tr>
<tr>
<td>Figure 2-10b</td>
<td>Habitat and Water Quality Example</td>
<td>2-15</td>
</tr>
<tr>
<td>Figure 2-11</td>
<td>Opportunity Areas</td>
<td>2-15</td>
</tr>
<tr>
<td>Figure 2-12</td>
<td>Canoga Park Opportunity Area</td>
<td>2-17</td>
</tr>
<tr>
<td>Figure 2-13</td>
<td>Open Space Measures for the CP-A Concept</td>
<td>2-20</td>
</tr>
<tr>
<td>Figure 2-14</td>
<td>Open Space Measures for the CP-B Concept</td>
<td>2-21</td>
</tr>
<tr>
<td>Figure 2-15</td>
<td>River Glen Opportunity Area</td>
<td>2-23</td>
</tr>
<tr>
<td>Figure 2-16</td>
<td>Open Space Measures for the RG-A Concept</td>
<td>2-26</td>
</tr>
<tr>
<td>Figure 2-17</td>
<td>Open Space Measures for the RG-B Concept</td>
<td>2-27</td>
</tr>
<tr>
<td>Figure 2-18</td>
<td>Taylor Yard Opportunity Area</td>
<td>2-29</td>
</tr>
<tr>
<td>Figure 2-19</td>
<td>Open Space Measures for the Taylor Yard Concept</td>
<td>2-31</td>
</tr>
<tr>
<td>Figure 2-20</td>
<td>Chinatown-Cornfields Opportunity Area</td>
<td>2-33</td>
</tr>
<tr>
<td>Figure 2-21</td>
<td>Open Space Measures for the CC-A Concept</td>
<td>2-35</td>
</tr>
<tr>
<td>Figure 2-22</td>
<td>Open Space Measures for the CC-B Concept</td>
<td>2-36</td>
</tr>
<tr>
<td>Figure 2-23</td>
<td>Downtown Industrial Opportunity Area</td>
<td>2-38</td>
</tr>
<tr>
<td>Figure 2-24</td>
<td>Open Space Measures for the DI-A Concept</td>
<td>2-41</td>
</tr>
<tr>
<td>Figure 2-25</td>
<td>Open Space Measures for the DI-B Concept</td>
<td>2-42</td>
</tr>
<tr>
<td>Figure 3-2-1</td>
<td>Prime and Unique Farmlands</td>
<td>3-4</td>
</tr>
<tr>
<td>Figure 3-4-1</td>
<td>Geohazards</td>
<td>3-14</td>
</tr>
<tr>
<td>Figure 3-5-1</td>
<td>Channelized portions of Arroyo Calabasas and Bell Creek converging to form the Los Angeles River at Canoga Park High School</td>
<td>3-20</td>
</tr>
<tr>
<td>Figure 3-5-2</td>
<td>Sepulveda Dam</td>
<td>3-21</td>
</tr>
<tr>
<td>Figure 3-5-3</td>
<td>Los Angeles River at Verdugo Wash</td>
<td>3-22</td>
</tr>
<tr>
<td>Figure 3-5-4</td>
<td>100 Year Flood Zone</td>
<td>3-29</td>
</tr>
<tr>
<td>Figure 3-6-1</td>
<td>Oil Wells and Oil Fields</td>
<td>3-34</td>
</tr>
<tr>
<td>Figure 3-7-1</td>
<td>Habitat/Connectivity Studies</td>
<td>3-42</td>
</tr>
<tr>
<td>Figure 3-7-2</td>
<td>Habitat Connectivity Goals</td>
<td>3-43</td>
</tr>
<tr>
<td>Figure 3-7-3</td>
<td>Vegetated Gravel Bars in the River Channel</td>
<td>3-44</td>
</tr>
<tr>
<td>Figure 3-7-4</td>
<td>Wetlands and Other Waters</td>
<td>3-46</td>
</tr>
<tr>
<td>Figure 3-7-5</td>
<td>Verdugo Wash at the Confluence with the Los Angeles River</td>
<td>3-47</td>
</tr>
<tr>
<td>Figure 3-8-1</td>
<td>Land Use in the River Corridor</td>
<td>3-52</td>
</tr>
<tr>
<td>Figure 3-8-2</td>
<td>Existing Land Use in Canoga Park Opportunity Area</td>
<td>3-53</td>
</tr>
</tbody>
</table>
LIST OF TABLES

<table>
<thead>
<tr>
<th>Table</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table 2.4-1</td>
<td>LARRMP Measures Comprising Canoga Park Opportunity Area Alternatives</td>
<td>2-18</td>
</tr>
<tr>
<td>Table 2.4-2</td>
<td>LARRMP Measures Comprising River Glen Opportunity Area Alternatives</td>
<td>2-24</td>
</tr>
<tr>
<td>Table 2.4-3</td>
<td>LARRMP Measures Comprising Taylor Yard Opportunity Area Proposed Concept</td>
<td>2-30</td>
</tr>
<tr>
<td>Table 2.4-4</td>
<td>LARRMP Measures Comprising Chinatown-Cornfields Opportunity Area Alternatives CC-A and CC-B</td>
<td>2-34</td>
</tr>
<tr>
<td>Table 2.4-5</td>
<td>LARRMP Measures Comprising Downtown Industrial Opportunity Area Alternatives DI-A and DI-B</td>
<td>2-39</td>
</tr>
<tr>
<td>Table 2.6-1</td>
<td>Summary of Alternatives Evaluated in this PEIR/PEIS</td>
<td>2-45</td>
</tr>
<tr>
<td>Table 3.3-1</td>
<td>Ambient Air Quality Standards</td>
<td>3-6</td>
</tr>
<tr>
<td>Table 3.3-2</td>
<td>Summary of Federal and State Attainment Status Designations for the South Coast Air Basin</td>
<td>3-7</td>
</tr>
<tr>
<td>Table 3.3-3</td>
<td>Summary of 2005 Air Quality Data at Air Quality Monitoring Stations</td>
<td>3-8</td>
</tr>
<tr>
<td>Table 3.4-1</td>
<td>Historic Earthquakes of Southern California (County of Los Angeles 2005)</td>
<td>3-12</td>
</tr>
<tr>
<td>Table 3.5-1</td>
<td>Clean Water Act Section 303(d) List of Water Quality Limited Segments</td>
<td>3-26</td>
</tr>
<tr>
<td>Table 3.5-2</td>
<td>Clean Water Act Section 303(d) Listing of Los Angeles River Reaches</td>
<td>3-27</td>
</tr>
<tr>
<td>Table 3.7-1</td>
<td>Special-Status Plant Species</td>
<td>3-38</td>
</tr>
<tr>
<td>Table 3.7-2</td>
<td>Special-Status Animal Species</td>
<td>3-39</td>
</tr>
<tr>
<td>Table 3.7-3</td>
<td>Wetland/Aquatic Habitat Classification</td>
<td>3-45</td>
</tr>
<tr>
<td>Table 3.8-1</td>
<td>Community Planning Areas in or Adjacent to the Los Angeles River Corridor</td>
<td>3-50</td>
</tr>
<tr>
<td>Table 3.8-2</td>
<td>Existing Land Use in the River Corridor</td>
<td>3-51</td>
</tr>
<tr>
<td>Table 3.8-3</td>
<td>Existing Land Use in Canoga Park Opportunity Area</td>
<td>3-52</td>
</tr>
<tr>
<td>Table 3.8-4</td>
<td>Existing Land Use in River Glen Opportunity Area</td>
<td>3-57</td>
</tr>
<tr>
<td>Table 3.8-5</td>
<td>Existing Land Use in Taylor Yard Opportunity Area</td>
<td>3-65</td>
</tr>
<tr>
<td>Table 3.8-6</td>
<td>Existing Land Use in Chinatown-Cornfields Opportunity Area</td>
<td>3-69</td>
</tr>
<tr>
<td>Table 3.8-7</td>
<td>Land Use in Downtown Industrial Opportunity Area</td>
<td>3-72</td>
</tr>
<tr>
<td>Table 3.9-1</td>
<td>Parks within a Two-Mile Radius of the River Corridor</td>
<td>3-77</td>
</tr>
<tr>
<td>Table 3.9-2</td>
<td>Parks within Canoga Park Opportunity Area</td>
<td>3-86</td>
</tr>
<tr>
<td>Table 3.9-3</td>
<td>Parks within River Glen Opportunity Area</td>
<td>3-88</td>
</tr>
<tr>
<td>Table 3.9-4</td>
<td>Parks within Taylor Yard Opportunity Area</td>
<td>3-89</td>
</tr>
<tr>
<td>Table 3.9-5</td>
<td>Parks within Chinatown-Cornfields Opportunity Area</td>
<td>3-92</td>
</tr>
<tr>
<td>Table 3.9-6</td>
<td>Parks within Downtown Industrial Opportunity Area</td>
<td>3-93</td>
</tr>
<tr>
<td>Table 3.11-1</td>
<td>Summary of Number of HTRW Sites of Interest—by Database Category—Within the Study Area</td>
<td>3-100</td>
</tr>
<tr>
<td>Table 3.11-2</td>
<td>Number of Schools Within or in Proximity to Opportunity Areas</td>
<td>3-102</td>
</tr>
<tr>
<td>Table 3.12-1</td>
<td>Freeways and State Highways in the Project Vicinity</td>
<td>3-106</td>
</tr>
<tr>
<td>Table 3.12-2</td>
<td>Roadway Segment Level of Service Definitions</td>
<td>3-107</td>
</tr>
<tr>
<td>Table 3.14-1</td>
<td>Zip Codes Associated with River Corridor and Opportunity Areas</td>
<td>3-127</td>
</tr>
<tr>
<td>Table 3.14-2</td>
<td>Population, Housing, Employment, and Income Summary Data in the River Corridor</td>
<td>3-129</td>
</tr>
<tr>
<td>Table 3.14-3</td>
<td>Business Establishments by Industry in the River Corridor</td>
<td>3-130</td>
</tr>
<tr>
<td>Table 3.14-4</td>
<td>LAUSD Schools within ½ mile of the River Corridor</td>
<td>3-134</td>
</tr>
<tr>
<td>Table 3.14-5</td>
<td>BUSD Schools within ½ mile of the River Corridor</td>
<td>3-141</td>
</tr>
<tr>
<td>Table 3.14-6</td>
<td>GUSD Schools within ½ mile of the River Corridor</td>
<td>3-142</td>
</tr>
<tr>
<td>Table 3.14-7</td>
<td>Police Departments Serving the River Corridor</td>
<td>3-145</td>
</tr>
<tr>
<td>Table 3.14-8</td>
<td>Population, Housing, Employment, and Income Summary Data in Canoga Park Opportunity Area</td>
<td>3-148</td>
</tr>
<tr>
<td>Table 3.14-9</td>
<td>Business Establishments by Industry in Canoga Park Opportunity Area</td>
<td>3-150</td>
</tr>
<tr>
<td>Table 3.14-10</td>
<td>Schools Serving Canoga Park Opportunity Area</td>
<td>3-151</td>
</tr>
</tbody>
</table>
Table 3.14-11 Population, Housing, Employment, and Income Summary Data in River Glen Opportunity Area .............................................................. 3-152
Table 3.14-12 Business Establishments by Industry in River Glen Opportunity Area .............................................................. 3-153
Table 3.14-13 Schools Serving River Glen Opportunity Area .......................................................................................... 3-155
Table 3.14-14 Population, Housing, Employment, and Income Summary Data in Taylor Yard Opportunity Area .............................................................. 3-156
Table 3.14-15 Business Establishments by Industry in Taylor Yard Opportunity Area .............................................................. 3-158
Table 3.14-16 Schools Serving Taylor Yard Opportunity Area .................................................................................. 3-159
Table 3.14-17 Population, Housing, Employment, and Income Summary Data in Chinatown-Cornfields Opportunity Area .............................................................. 3-161
Table 3.14-18 Business Establishments by Industry in Chinatown-Cornfields Opportunity Area .............................................................. 3-162
Table 3.14-19 Schools Serving Chinatown-Cornfields Opportunity Area .................................................................................. 3-163
Table 3.14-20 Population, Housing, Employment, and Income Summary Data in Downtown Industrial Opportunity Area .............................................................. 3-165
Table 3.14-21 Business Establishments by Industry in Downtown Industrial Opportunity Area .............................................................. 3-166
Table 3.15-1 Population Percentages for 2000 by Race/Ethnicity of the Census Blocks along the River Corridor .............................................................. 3-167
Table 3.15-2 Population Percentages for 2000 by Race/Ethnicity of the Census Blocks for the Five Opportunity Areas .............................................................................................. 3-170
Table 3.16-1 Designated Canoga Park Opportunity Area Cultural Resources .............................................................................................. 3-180
Table 3.16-2 Designated Taylor Yard Opportunity Area Cultural Resources .............................................................................................. 3-182
Table 3.16-3 Designated Chinatown-Cornfields Opportunity Area Cultural Resources .............................................................................................. 3-183
Table 3.16-4 Designated Downtown Industrial Opportunity Area Cultural Resources .............................................................................................. 3-185
Table 4.8-1 Community Planning Areas in or Adjacent to Los Angeles River Corridor .............................................................. 4-63
Table 4.10-1 Typical Demolition and Construction Site Equipment Sound Levels .............................................................................................. 4-114
Table 4.12-1 Roadway Segment Level of Service Definitions .............................................................................................. 4-138
Table 4.12-2 Maximum Allowable Increase in V/C Ratio per Roadway LOS .............................................................................................. 4-139
Table 4.18-1 Growth Forecasts in the City of Los Angeles .............................................................................................. 4-217
Table 4.18-2 Population and Housing Growth Trends Throughout the Planning Area .............................................................................................. 4-218
Table 4.19-1 Summary Table .............................................................................................................................................................. 4-228
Table 5-1 Applicable Federal, State, and Local Laws, Regulations, and Executive Orders .............................................................................................. 5-2
APPENDICES

Appendix

Volume I
A PEIR/PEIS Distribution List
B List of Acronyms and Abbreviations
C Terminology and Glossary
D Matrix of Documents Reviewed for the PEIR/EIS
E Index

Volume II
F Public Comments and Responses
Public Comments and Responses
F.1 Introduction

This document is a combined Programmatic Environmental Impact Report (PEIR) and Programmatic Environmental Impact Statement (PEIS) for the Los Angeles River Revitalization Master Plan (LARRMP) (City of Los Angeles 2006b). This combined PEIR/PEIS document addresses potential environmental impacts of implementing the LARRMP in the foreseeable future. Revitalization measures for the Los Angeles River would begin to be implemented within five years of the anticipated adoption of the LARRMP in spring 2007 (near term) and would continue for many years (long term). The City of Los Angeles, Department of Public Works (LADPW) Bureau of Engineering (BOE) is the California Environmental Quality Act (CEQA) lead agency, and the US Army Corps of Engineers, Los Angeles District (Corps) is the National Environmental Policy Act (NEPA) lead agency for this combined PEIR/PEIS.

The Draft PEIR/PEIS was circulated for public review and comment for 54 days (February 02, 2007 to March 27, 2007), exceeding typical CEQA and NEPA regulations. During this period, three public hearings were held in three different locations on three separate dates (Hollenbeck Middle School, February 24, 2007; Canoga Park High School, February 27, 2007; Los Angeles Metropolitan Water District, February 28, 2007) to provide opportunities for presenting oral and written comments on the Draft PEIR/PEIS. In addition, individuals and representatives of organizations and agencies were invited to submit written comments without attending the public hearings. All comments, as well as City of Los Angeles and Corps responses, are included in this Appendix.

This Final PEIR/PEIS contains the information contained in the Draft PEIR/PEIS (State Clearinghouse No. 2006041050), comments received during the Draft PEIR/PEIS circulation period, and the responses to these comments. Changes to the text of the draft were made, where applicable, in response to comments received. Where additions have been made to the text of the Draft PEIR/PEIS, these changes are noted as underlined text in this document. Deletions made in the text have not been noted.

In compliance with CEQA and NEPA regulations, this Appendix also includes a list of agencies, organizations, and individuals commenting on the Draft PEIR/PEIS, copies of their comments, and the responses to these comments. In the responses to each comment provided on the following pages, the places in the Final PEIR/PEIS where changes were made have been indicated, as applicable. The co-lead agencies greatly appreciate the participation of all those who commented, and while not all comments required changes to the Final PEIR/PEIS, all comments are included in this document, as part of the public record.
### F.2 APPENDIX F INDEX OF COMMENTERS

<table>
<thead>
<tr>
<th>Document code</th>
<th>Commenter</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal Agencies</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F-1</td>
<td>US Department of Interior</td>
<td>F-1</td>
</tr>
<tr>
<td>F-2</td>
<td>US EPA</td>
<td>F-4</td>
</tr>
<tr>
<td><strong>State Agencies</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>S-1</td>
<td>California Department of Transportation</td>
<td>F-10</td>
</tr>
<tr>
<td>S-2</td>
<td>State Clearinghouse and Planning Unit</td>
<td>F-11</td>
</tr>
<tr>
<td>S-3</td>
<td>Native American Heritage Commission</td>
<td>F-14</td>
</tr>
<tr>
<td>S-4</td>
<td>Public Utilities Commission</td>
<td>F-16</td>
</tr>
<tr>
<td>S-5</td>
<td>California Regional Water Quality Control Board</td>
<td>F-18</td>
</tr>
<tr>
<td><strong>Local Agencies</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>L-1</td>
<td>City of Burbank Community Development</td>
<td>F-22</td>
</tr>
<tr>
<td>L-2</td>
<td>City of Calabassas</td>
<td>F-24</td>
</tr>
<tr>
<td>L-3</td>
<td>City of Glendale Planning Department</td>
<td>F-25</td>
</tr>
<tr>
<td>L-4</td>
<td>County of Los Angeles Department of Parks and Recreation</td>
<td>F-29</td>
</tr>
<tr>
<td>L-5</td>
<td>County of Los Angeles Department of Public Works (Chong, Suk)</td>
<td>F-30</td>
</tr>
<tr>
<td>L-6</td>
<td>County of Los Angeles Department of Public Works (Wolfe, Donald)</td>
<td>F-38</td>
</tr>
<tr>
<td>L-7</td>
<td>Los Angeles Unified School District</td>
<td>F-39</td>
</tr>
<tr>
<td>L-8</td>
<td>Metropolitan Transportation Authority</td>
<td>F-41</td>
</tr>
<tr>
<td>L-9</td>
<td>Southern California Assoc. of Governments</td>
<td>F-43</td>
</tr>
<tr>
<td><strong>Non-Governmental Organizations</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>O-1</td>
<td>Alianza de los Pueblos del Río</td>
<td>F-63</td>
</tr>
<tr>
<td>O-2</td>
<td>Audubon Center at Debs Park</td>
<td>F-72</td>
</tr>
<tr>
<td>O-3</td>
<td>Chinatown Community Advisory Committee</td>
<td>F-76</td>
</tr>
<tr>
<td>O-4</td>
<td>Equestrian Trails, Inc.</td>
<td>F-77</td>
</tr>
<tr>
<td>O-5</td>
<td>Griffith Park Master Plan Working Group</td>
<td>F-78</td>
</tr>
<tr>
<td>O-6</td>
<td>Homeowners of Encino</td>
<td>F-81</td>
</tr>
<tr>
<td>O-7</td>
<td>The Los Angeles &amp; San Gabriel Rivers Watershed Council</td>
<td>F-92</td>
</tr>
<tr>
<td>O-8</td>
<td>Los Angeles Audubon</td>
<td>F-97</td>
</tr>
<tr>
<td>O-9</td>
<td>LaeRoc Funds</td>
<td>F-100</td>
</tr>
<tr>
<td>O-10</td>
<td>NRDC (Natural Resources Defense Council)</td>
<td>F-102</td>
</tr>
<tr>
<td>O-11</td>
<td>North East Trees</td>
<td>F-111</td>
</tr>
<tr>
<td>O-12</td>
<td>The River Project</td>
<td>F-118</td>
</tr>
<tr>
<td>O-13</td>
<td>Roll International Corporation</td>
<td>F-122</td>
</tr>
<tr>
<td>O-14</td>
<td>San Fernando Valley Audubon Society</td>
<td>F-127</td>
</tr>
<tr>
<td>O-15</td>
<td>STNC</td>
<td>F-130</td>
</tr>
<tr>
<td>O-16</td>
<td>Studio City Residents Association</td>
<td>F-131</td>
</tr>
<tr>
<td>O-17</td>
<td>Tree People</td>
<td>F-133</td>
</tr>
<tr>
<td>O-18</td>
<td>VICA</td>
<td>F-139</td>
</tr>
<tr>
<td><strong>Individuals</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I-1</td>
<td>Bowlingraks</td>
<td>F-142</td>
</tr>
<tr>
<td>I-2</td>
<td>Yu-Han Chang</td>
<td>F-143</td>
</tr>
<tr>
<td>I-3</td>
<td>Vivian Chen-Recinos</td>
<td>F-144</td>
</tr>
<tr>
<td>I-4</td>
<td>Laurie Cohn</td>
<td>F-145</td>
</tr>
<tr>
<td>Document code</td>
<td>Commenter</td>
<td>Page No.</td>
</tr>
<tr>
<td>---------------</td>
<td>-----------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>I-5</td>
<td>Joyce Dillard</td>
<td>F-147</td>
</tr>
<tr>
<td>I-6</td>
<td>Dr. Sabrina Drill</td>
<td>F-158</td>
</tr>
<tr>
<td>I-7</td>
<td>Diane Edwardson</td>
<td>F-159</td>
</tr>
<tr>
<td>I-8</td>
<td>Jennifer Gill</td>
<td>F-162</td>
</tr>
<tr>
<td>I-9</td>
<td>Kathy Hasset</td>
<td>F-163</td>
</tr>
<tr>
<td>I-10</td>
<td>Elizabeth Herron</td>
<td>F-164</td>
</tr>
<tr>
<td>I-11</td>
<td>David Hill</td>
<td>F-166</td>
</tr>
<tr>
<td>I-12</td>
<td>Clara Irazabal</td>
<td>F-169</td>
</tr>
<tr>
<td>I-13</td>
<td>Tim Keating</td>
<td>F-174</td>
</tr>
<tr>
<td>I-14</td>
<td>Bonnie Klea</td>
<td>F-176</td>
</tr>
<tr>
<td>I-15</td>
<td>Robert Leyland</td>
<td>F-177</td>
</tr>
<tr>
<td>I-16</td>
<td>Alfred Lopez</td>
<td>F-180</td>
</tr>
<tr>
<td>I-17</td>
<td>Mikeonsp</td>
<td>F-181</td>
</tr>
<tr>
<td>I-18</td>
<td>Mr. and Mrs. (Loreta) Nicholas Parrillo</td>
<td>F-182</td>
</tr>
<tr>
<td>I-19</td>
<td>Bramirez</td>
<td>F-184</td>
</tr>
<tr>
<td>I-20</td>
<td>Redbeccal74</td>
<td>F-185</td>
</tr>
<tr>
<td>I-21</td>
<td>Susan Rocha</td>
<td>F-186</td>
</tr>
<tr>
<td>I-22</td>
<td>Angel Rodriguez</td>
<td>F-188</td>
</tr>
<tr>
<td>I-23</td>
<td>Barbara Rowe</td>
<td>F-190</td>
</tr>
<tr>
<td>I-24</td>
<td>Tony Taylor</td>
<td>F-191</td>
</tr>
<tr>
<td>I-25</td>
<td>Wendy Wert</td>
<td>F-193</td>
</tr>
<tr>
<td>I-26</td>
<td>William Preston bowling</td>
<td>F-194</td>
</tr>
<tr>
<td>I-27</td>
<td>Glen Wilson</td>
<td>F-195</td>
</tr>
</tbody>
</table>

Oral Comments (Transcripts) from Public Hearings

<p>| T-1 | A. Teran                                      | F-204 and F-220 |
| T-2 | M. Luna                                       | F-205          |
| T-3 | J. Gonzales                                   | F-206          |
| T-4 | K. Roman                                      | F-206          |
| T-5 | Ms. Munoz                                     | F-207          |
| T-6 | K. Mendez                                     | F-207          |
| T-7 | T. Reyes                                      | F-208          |
| T-8 | J. Estrada                                    | F-208          |
| T-9 | A. Lopez                                      | F-209          |
| T-10 | D. Martinez                                  | F-209          |
| T-11 | C. Velazquez                                  | F-210          |
| T-12 | C. Arevalo                                    | F-210          |
| T-13 | Alma Gonzalez                                 | F-210          |
| T-14 | K. Barbosa                                    | F-211          |
| T-15 | P. Sirola                                     | F-211          |
| T-16 | J. Stewart                                    | F-212          |
| T-17 | Antonio Gonzalez                              | F-213          |
| T-18 | B. Whittlesey                                 | F-214          |
| T-19 | R. Trotman                                    | F-214          |
| T-20 | Th. Marquez                                   | F-215          |
| T-21 | J. Miguel Flores                              | F-215          |
| T-22 | A. Demos                                      | F-216          |
| T-23 | M. Castorena                                  | F-217 and F-219|
| T-24 | L. Heron                                      | F-217          |
| T-25 | J. Castianos                                  | F-218          |
| T-26 | V. Reyes                                      | F-218          |
| T-27 | Unidentified Speaker                          | F-220          |</p>
<table>
<thead>
<tr>
<th>Document code</th>
<th>Commenter</th>
<th>Page No.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>T-28</td>
<td>G. Pomerantz</td>
<td>F-228</td>
<td></td>
</tr>
<tr>
<td>T-29</td>
<td>A. Salkin</td>
<td>F-229</td>
<td></td>
</tr>
<tr>
<td>T-30</td>
<td>B. Jacobi</td>
<td>F-229</td>
<td></td>
</tr>
<tr>
<td>T-31</td>
<td>T. Burman</td>
<td>F-229</td>
<td></td>
</tr>
<tr>
<td>T-32</td>
<td>Sh. Arora</td>
<td>F-230</td>
<td></td>
</tr>
<tr>
<td>T-33</td>
<td>B. Burke</td>
<td>F-230</td>
<td></td>
</tr>
<tr>
<td>T-34</td>
<td>K. Ohlerkamp</td>
<td>F-231</td>
<td></td>
</tr>
<tr>
<td>T-35</td>
<td>W. Bouling</td>
<td>F-232</td>
<td></td>
</tr>
<tr>
<td>T-36</td>
<td>F. Beer</td>
<td>F-232</td>
<td></td>
</tr>
<tr>
<td>T-37</td>
<td>G. Stoddard</td>
<td>F-232</td>
<td></td>
</tr>
<tr>
<td>T-38</td>
<td>S. Backlar</td>
<td>F-233</td>
<td></td>
</tr>
<tr>
<td>T-39</td>
<td>J. Backlar</td>
<td>F-233</td>
<td></td>
</tr>
<tr>
<td>T-40</td>
<td>E. Herman</td>
<td>F-233</td>
<td></td>
</tr>
<tr>
<td>T-41</td>
<td>L. McAdams</td>
<td>F-241</td>
<td></td>
</tr>
<tr>
<td>T-42</td>
<td>S. Neubauer</td>
<td>F-242</td>
<td></td>
</tr>
<tr>
<td>T-43</td>
<td>T. Grabel</td>
<td>F-242</td>
<td></td>
</tr>
<tr>
<td>T-44</td>
<td>B. Westwater</td>
<td>F-243</td>
<td></td>
</tr>
<tr>
<td>T-45</td>
<td>D. Green</td>
<td>F-244</td>
<td></td>
</tr>
<tr>
<td>T-46</td>
<td>M. Winter</td>
<td>F-244 and F-246</td>
<td></td>
</tr>
<tr>
<td>T-47</td>
<td>B. Alberti</td>
<td>F-245</td>
<td></td>
</tr>
<tr>
<td>T-48</td>
<td>R. Franco</td>
<td>F-246</td>
<td></td>
</tr>
</tbody>
</table>
FEDERAL AGENCY COMMENTS
F-1-1: We concur. We will change language in the first sentence of Section 3.7.1.3 of the Final PEIR/PEIS, to read, “In general, the 32 mile stretch of the River in Los Angeles impacts very few federal- or state-listed endangered or threatened species. U.S. Fish and Wildlife Service records indicate that the Sepulveda Basin is a suitable habitat for the endangered least Bell’s vireo (*Vireo bellii pusillus*). All future specific projects within the River Corridor at the Sepulveda Basin would assess impacts on this species.”
F-1-2: The Sepulveda Sports Complex is a project for which the U.S. Army Corps of Engineers is preparing a NEPA document (FONSI). The City will implement all measures recommended by the U.S. Fish and Wildlife Service as well as the California Department of Fish and Game. As with all future LARRMP projects, those within the Sepulveda Basin would be the subject of specific subsequent environmental reviews; these would note the recorded presence of the least Bell’s vireo as indicated by the U.S. Fish and Wildlife Service.

F-1-3: Comment acknowledged. Citation and reference will be added to Final PEIR/PEIS.

F-1-4: The 92 cubic feet per second quoted in the text refers to the maximum monthly mean average for the summer months (June to August) with the maximum occurring on July 2005 based on the monthly data summary provided at referenced website. Dry weather flow out of the Sepulveda Basin is largely influenced by the outflow from the Tillman Water Reclamation Plant, which began continuous operation in 1985 and doubled in capacity in 1991. Recent monitoring data—primarily within the past 2 decades—is more representative of dry weather flows due to an increase in treated effluent from urban development in the area of service. Sentence changed to clarify the origins and nature of the data.

F-1-5: The intent of the paragraph is to show variability of the flow in the L.A. River at different locations along the river. The same periods of record analyzed and an additional data added for the discussion of the flow variability along the length of the river. The Wardlow Station period of record is a typo with the period of record being 1988 to 2000. The paragraph was rewritten for clarity.
Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc:
Director, OEPC
FWS, CNO
USGS

REFERENCE

March 26, 2007

Catherine Shuman
U.S. Army Corps of Engineers
Los Angeles District
915 Wilshire Blvd, Suite 980
Los Angeles, CA 90017

Subject: Draft Programmatic Environmental Impact Statement (DEIS) for the Los Angeles River Revitalization Master Plan (CEQ# 70028)

Dear Ms. Shuman:

The Environmental Protection Agency (EPA) has reviewed the DEIS referenced above. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The Los Angeles River Revitalization Master Plan (LARRMP) is a conceptual framework to guide revitalization of the Los Angeles River. The goals of the project are improving the ecosystem functions along the River as well as creating economic development opportunities for river-adjacent communities. The LARRMP consists of 239 projects over a 32 mile section of the Los Angeles River and includes: physical transformations to the river channel, open space development, plans for restoring a more natural system, and policy recommendations for revitalizing adjacent communities. We have rated this project as Lack of Objections (LO) (see enclosed Summary of Rating Definitions).

EPA supports the goals of the LARRMP and understands, from our conversation with the Corps of Engineers, that plan details will be included in a subsequent Corps of Engineers (Corps) Feasibility Study Draft Environmental Impact Report/Environmental Impact Statement (Feasibility Study). However, the LARRMP is not clear about how this NEPA/CEQA process will inform the Feasibility Study or the timeline for the future analysis. It would have been appropriate to wait until the completion of the Feasibility Study to release a NEPA document that presents the public with a comprehensive review of the project components. Nevertheless, EPA has developed specific recommendations for the forthcoming Feasibility Study, as well as the Final EIS. These recommendations are enclosed in our detailed comments.

F-2-2: Comment acknowledged. We concur.

F-2-1: The Corps will incorporate relevant information from this PEIR/PEIS document into the Los Angeles River Ecosystem Restoration Feasibility Study, which is being prepared. The Feasibility Study is anticipated to provide a framework and platform for identifying and evaluating potential future ecosystem restoration projects along the Los Angeles River that will help realize the objectives of the Corps’ Ecosystem Restoration Program for the Los Angeles River Basin, as well as to support any overlap with the goals and objectives of the LARRMP. The Corps will use the information from the LARRMP and the PEIR/PEIS to complete the Feasibility Study according to the Federal study process, and in so doing will also expand the PEIS to be consistent with Federal recommendations as they are developed in the feasibility study.
Comments

While the LARRMP is needed to help address long-standing environmental, social, and economic problems, construction of projects of this size can have potentially significant impacts. EPA’s primary concerns are impacts to low income and minority communities and air quality. As we discussed with you recently, EPA supports the Corps commitment to strong monitoring and mitigation measures for project-related impacts.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send (2) copies to the address above (mailcode: CED-2). We would be happy to discuss more specific recommendations, including ecosystems needs and water quality issues, during the preparation of the Feasibility Study. If you have any questions, please contact me at 415-972-3846 or Summer Allen, the lead reviewer for this project at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

Nova Blazej, Manager
Environmental Review Office

Enclosures:        Summary of EPA’s Rating Definitions
                  Detailed Comments

Cc:               Carol Armstrong, LARRMP Project Manager
                  City of Los Angeles, Bureau of Engineering
Comments on the LA River Revitalization Master Plan Programmatic DEIS

Economic Development

One of the main project goals is to create economic development opportunities to enhance and improve river-adjacent communities. We recognize that a detailed economic analysis will be done as part of the Feasibility Study to determine project alternatives that best consider the needs of the biological resources and the local economy.

Recommendations:
The Final Environmental Impact Statement (FEIS) should also include a summary of the possible economic benefits that could be realized with implementation of the additional construction included in the Alternative B variations.

Scoping Comments

We are supportive of the extensive coordination between the City, County, and other interested parties, as well as the proposed formation of the Los Angeles River Authority, Los Angeles River Foundation, and the Los Angeles river Revitalization Corporation.

Recommendations:
Given the extensive community discussion that has been initiated in the formation of the project, the FEIS should include a summary of the public scoping comments and how those are being or will be addressed through the project.

Air Quality

Some information in the FEIS should be revised. In particular, the discussion of the number of days exceeding the National Ambient Air Quality Standards (NAAQS) after 1999 on page 3-5 is not specific for 8-hour ozone, and should be revised. In each year since 1999, the South Coast Air Basin has exceeded the 8-hour NAAQS at least 80 days per year. In addition, regarding the California Air Resources Board (CARB) mobile source discussion on pp. 4-6, CARB has been working to develop a statewide strategy as part of the 2007 California State Implementation Plan (SIP) or 8-hour ozone. The most recent version was published on January 31, 2007, and can be found at: http://www.arb.ca.gov/planning/sip/2007casip.htm.

Recommendations:
The FEIS should include the most recent data on air quality attainment status.

Comments for the Upcoming Feasibility Study DEIR/DEIS

Environmental Justice

Executive Order 12898 on Environmental Justice addresses disproportionate and adverse impacts of federal actions on minority and low-income populations. The DEIS identifies large Latino and low-income populations that exist within the vicinity of the River corridor. It notes that 18% of individual in the corridor are below the poverty line, vs. 12% in the U.S. in general.

Responses

F-2-3: Comment acknowledged. Chapter 7 of the LARRMP provides a general discussion of the potential costs and benefits associated with the alternative development concepts presented in the Plan. The Corps will complete an appropriate regional economic development analysis during the Feasibility Study.

F-2-4: A Summary of the comments received during the scoping phase is presented in Section 1.8.2 of the PEIR/PEIS. The majority of the issues raised during scoping pertain to activities that should be undertaken at the time when specific LARRMP implementation projects are brought forward for environmental review. Those topics and issues raised during scoping that pertain to the Programmatic level of analysis in this PEIR/PEIS have been addressed.

F-2-5: Comment acknowledged. We concur. Text changes will be made in Section 3.3.2 (Air Quality Conditions in Project Area), and Section 4.3.1.1 (Regulatory Framework), will be modified in accordance with EPA comments.

F-2-6: Comment acknowledged. We concur. The Feasibility Study will address environmental justice concerns. The Study’s environmental review process (EIS/EIR) will provide the opportunity for all members of the public to provide input on alternatives and project elements throughout the Study process, as well as identify appropriate project-specific mitigation measures.
F-2-7: Comment acknowledged. The Feasibility Study and accompanying NEPA/CEQA environmental evaluations will identify and address impacts (including cumulative impacts) associated with potential future ecosystem restoration projects along the Los Angeles River. Such impacts will be further addressed at the project level when specific projects are proposed and evaluated.

F-2-8: Comment acknowledged. We concur. The Feasibility Study and associated environmental NEPA and CEQA documents will address all criteria pollutants, including CO, O3, PM10, PM2.5, in light of the current non-attainment status, and in accordance with SCAQMD and the CAA standards and requirements, and will address employing appropriate best management practices, best available control measures, and project-specific mitigation measures, including the development and use of construction emission mitigation plans and mitigation monitoring plans.

F-2-6

Likewise, 15% of the families in the area are below the poverty line, compared to 9% of families in the U.S. in general (p.3-129). In 2004, 38-75% of those in the opportunity areas were Hispanic and these populations have higher poverty rates (16-32%).

**Recommendations:**
The Feasibility Study should include a description of outreach efforts to low-income and minority populations, as well as appropriate project-specific mitigation measures that are identified through this process.

F-2-7

Socioeconomic Impacts

While the document notes that all alternatives are expected to result in net beneficial socioeconomic impacts if mitigation measures are implemented (p.4-165), the LAARMP revitalization measures within many of the opportunity areas may result in displacement of residential land uses. Many other large-scale projects are taking place or are planned for the LA River area which may also impact the availability of affordable housing. Therefore, it is important that future impact analyses at the project level should address any potential socioeconomic impacts and cumulative impacts associated with effects on affordable housing in the River Corridor as noted on page 4-220.

**Recommendations:**
The document discusses the William H. Mead Housing Project, but additional, available information should be included regarding the construction of other affordable housing projects. The Feasibility Study should discuss in detail how cumulative land use changes may affect the construction of affordable housing and, in general, how impacts will be mitigated.

F-2-8

Air Quality

The proposed project is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) implements local air quality regulations in the SCAB to carry out Federal Clean Air Act (CAA) requirements, as authorized by the EPA. The current SCAB nonattainment designations under the Federal CAA are as follows: carbon monoxide-serious nonattainment; 8-hour ozone-serious nonattainment; particulate matter with a diameter of 10 microns or less (PM10)-serious nonattainment; and particulate matter with a diameter of 2.5 microns or less (PM2.5)-nonattainment. The SCAB has the worst 8-hour ozone and PM2.5 problems in the nation and attainment of these National Ambient Air Quality Standards (NAAQS) will require massive reductions from mobile sources, given the rapid growth in this emissions category and the long lifespan of diesel engines.

We note that mitigation measures are only considered for PM-10 (fugitive dust) from construction and that mitigation for combustion emissions (both PM-10 and PM-2.5) will be considered in the Feasibility Study and project-level documents. In addition, page 3-108 notes that "By 2010, a 38 percent increase in vehicle travel is projected" and from the project description, it looks like the project will include changes to existing roadways (or possibly the building of new roadways) that might trigger transportation conformity. According to Caltrans environmental guidance, in nonattainment or maintenance areas, transportation conformity
applies if projects will be funded by the Federal Highways Administration, Federal Transit Administration, or any agency that has been delegated project approval by these agencies. It also applies if projects are determined to be regionally significant as defined at 40 CFR 93.101 and are approved by a regular recipient of federal highway or transit funds, such as Caltrans and most local transportation agencies. A further demonstration of transportation conformity—at the project level—is required if a project is located in a nonattainment or maintenance area.

Recommendations:
Due to the serious nature of the PM_{10} and PM_{2.5} conditions in SCAB, EPA recommends that the best available control measures (BACM) for these pollutants be implemented at all times and that the Feasibility Study, FEIS and Record of Decision (ROD) incorporate a Construction Emissions Mitigation Plan (CEMP). While we recognize that Best Management Practices (BMPs) for fugitive dust have already been proposed (DEIS, p. 264 and 265), we recommend that (1) all applicable requirements under SCAQMD Rules, (2) the Caltrans Standard Construction Specifications and recommended measures listed on pages 264 and 265 of the DEIS, and (3) the following additional and/or revised measures, be incorporated into a CEMP associated with the Feasibility Study:

Mobile and Stationary Source Controls:
- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer’s specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturers’ recommendations.
- Require that leased equipment be 1996 model or newer unless cost exceeds 110 percent or average lease cost. Require 75 percent or more of total horsepower of owned equipment to be used be 1996 or newer models. If practical, lease newer and cleaner equipment meeting the most stringent of applicable Federal or State Standards (see table: http://arfb.ca.gov/msprog/diesel/documents/ORH-Road%20Diesel%20Std.xls). In general, only Tier 2 or newer engines should be employed in the construction phase, given the scale of the construction project, the level of the exposed population, and the high background levels of pollutants in the area.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Administrative controls:
- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
• Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)

• Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.

• Develop a construction, traffic, and parking management plan that minimizes traffic interference and maintains traffic flow.

• Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which the Corps will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors away from fresh air intakes to buildings and air conditioners.

• Reflect the SCAQMD's BACMs for fugitive dust mitigation listed in Tables 3-13.11 - 3-13.13 in the Mitigation Reporting Plan (i.e., should be enumerated as mitigation measures in the monitoring report on p. 264 and 265). Moreover, given the severity of the PM problem in the area and the size of the construction activity associated with the proposed project, commit to implement during all construction phases more than the minimum of one BACM in each category in order to reduce PM emissions to the minimum.

The Feasibility Study and follow-up documents should determine if the projects could be determined as regionally significant as defined at 40 CFR 93.101 and would, therefore, necessitate transportation conformity.
Letter S-1

Comments

S-1-1: Comment acknowledged.

S-1-2: Comment acknowledged. We concur.

Dear Dr. Armstrong:

We have received the Draft Programmatic Environmental Impact Report (PEIR) for the program referenced above right. The proposed program is to restore elements of natural-habitat/ water-quality and economic/ recreation/ open-space functions of the Los Angeles River channel within the area of Los Angeles City. For the California State Department of Transportation (Caltrans), we have the following comments related to the Draft.

We appreciate the attention given to construction management traffic planning. Noting the potential awkwardness of large trucks, particularly if any are over-size or -weight vehicles, we ask that such planning take account of any difficult circumstances at or near local street off-take from freeway off-ramps. Such circumstances might include limited available distances for turning or for vehicle queues between intersections, or limited number of lanes and signal times. Difficult circumstances might also further increase difficulties with any truck platooning (caravans of trucks) such as described in our April 2006 letter for the Notice of Preparation.

Because the current Draft is “programmatic level” rather than “project level”, operational impacts on the often congested Caltrans freeways and their interchanges cannot be specifically evaluated at this time. The extent of operational impacts can vary in nature and in degree, and so we ask that notification and consultation with Caltrans begin as soon as possible, when specific projects are determined.

If you have any questions on our comments, refer to our internal IGR/CEQA Record Number for this letter of 070207/EK; and please do not hesitate to contact our review coordinator Edwin Kamppmann at (213) 897-1346 or to contact me at (213) 897-3747.

Sincerely,

Cheryl Powell
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"
March 19, 2007

Carol Armstrong
City of Los Angeles
1149 S. Broadway Street, Suite 600
Los Angeles, CA 90015

Subject: Los Angeles River Revitalization Master Plan Programmatic EIR/EIS
SCH#: 2006041050

Dear Carol Armstrong:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 16, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“Any responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency
# Public Comments and Responses

## Comments

**Document Details Report**  
**State Clearinghouse Data Base**

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<td>Project Title</td>
<td>Los Angeles River Revitalization Master Plan Programmatic EIR/EIS</td>
</tr>
<tr>
<td>Lead Agency</td>
<td>Los Angeles, City of</td>
</tr>
<tr>
<td>Type</td>
<td>EIR Draft EIR</td>
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<td>Description</td>
<td>The Los Angeles River Revitalization Master Plan is a blueprint for implementing a variety of greening projects, including the development of parks and open space, pedestrian and bicycle trails, bridges, enhanced connector streets, channel modifications, revitalized riverfront communities in key opportunity areas and a River Improvement Overlay (RIO) district along the 32-mile stretch of the River within the City of Los Angeles. Implementing the LARRMP recommendations over the near-term planning period (6 to 20 years) and the long-term planning period (20 to 50 years) constitutes the proposed action evaluated in the PEIR/EIR. The general project area includes approximately one-half mile on each side of the 32-mile River corridor that begins near Owensmouth Avenue in Canoga and continues downstream to Washington Boulevard, near the northern boundary of the city of Vernon. The Plan intends to revitalize the general environment of the Los Angeles River by providing improved natural habitat, economic values, and water quality, as well as recreation, and open space amenities. The Plan area includes several locations where the potential exists for restoring a more natural riverine environment along the River, while maintaining and improving levels of flood protection. Creation of treatment wetlands in and around the River, to treat storm flows and to restore missing linkages of fragmented habitat, would also be pursued through LARRMP projects. LARRMP projects include the provision of improved public access in the River to the River and reinvestment in the urban system that results in economic growth.</td>
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### Lead Agency Contact

| Name | Carol Armstrong |
| Agency | City of Los Angeles |
| Phone | (213) 485-5762 |
| Fax | |
| Address | 1149 S. Broadway Street, Suite 600 |
| City | Los Angeles |
| State | CA |
| Zip | 90015 |

### Project Location

| County | Los Angeles |
| City | |
| Region | |
| Cross Streets | |
| Parcel No. | |
| Township | |
| Range | |
| Section | |
| Base | |

### Proximity to:

- **Highways:** 2, 134, 11, 5, 118
- **Airports:** Burbank
- **Railways:** UP RR, BNSF, Metrolink
- **Waterways:** LA River
- **Schools:** LAUSD
- **Land Use:** Various

### Project Issues

- Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Abstraction; Economic/Jobs; Fiscal Impacts; Floodplain/Flooding; Geologic/Seismic; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

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**Note:** Blanks in data fields result from insufficient information provided by lead agency.
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<td><strong>Date Received</strong></td>
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**Note:** Blanks in data fields result from insufficient information provided by lead agency.
Letter S-3

S-3-1: The actions recommended by the NAHC in their letter dated February 23, 2007, that are not currently addressed in Section 4.16.8 (Mitigation Actions and Best Management Practices) will be added in the Final PEIR/PEIS. Also, the letter from NAHC conveying these suggested actions will be included in the Appendix of the Final PEIR/PEIS.

Comments

Responses

S-3-1: The actions recommended by the NAHC in their letter dated February 23, 2007, that are not currently addressed in Section 4.16.8 (Mitigation Actions and Best Management Practices) will be added in the Final PEIR/PEIS. Also, the letter from NAHC conveying these suggested actions will be included in the Appendix of the Final PEIR/PEIS.

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Comments

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by the Commission if the initial study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave items.

\[\text{\checkmark Health and Safety Code \$7050.5, Public Resources Code \$5097.88 and Sec. \$15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.}\]

\[\text{\checkmark Lead agencies should consider avoidance, as defined in \$ 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.}\]

Please feel free to contact me at (916) 663-6251 if you have any questions.

Sincerely,

Dave Singleton, Program Analyst

Cc: State Clearinghouse

Attachment: List of Native American Contacts
March 16, 2007

File Number: Los Angeles River Revitalization Master Plan

Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

Dear Ms. Armstrong:

Re: SCH# 2006041050; Los Angeles River Revitalization Master Plan (PEIR/PEIS)

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

The Commission’s Rail Crossings Engineering Section (RCES) staff recently reviewed the Los Angeles River Revitalization Master Plan Programmatic Environmental Impact Report/Programmatic Environmental Impact Statement (PEIR/PEIS). After reviewing the PEIR/PEIS, RCES staff has concerns over the proposed increased access for pedestrians and vehicular traffic over the Southern California Regional Rail Authority’s (Metrolink) railroad tracks by constructing new railroad crossings for the parkways, pedestrian walk trails, bike paths, and promenades.

The Commission has adopted the Federal Railroad Administrations policy on reducing the number of at-grade crossings, and accordingly does not approve the construction of new at-grade crossings unless the applicant can provide substantial evidence that a grade separation is not practicable.

Further, a portion of the project will parallel San Fernando Road and Metrolink’s Ventura and Antelope Valley Line. There are 64 train movements a day along this corridor with a maximum speed of 79 mph. RCES has concerns over increasing vehicular and pedestrian volume over the existing nearby at-grade crossings and the increased pedestrian circulation patterns/destinations with respect to the railroad right-of-way.

Mitigation measures to consider include, but are not limited to, grade separation of major thoroughfares, safety improvements to existing at-grade highway-rail crossings due to an increase in traffic volumes and appropriate fencing to limit the access of trespassers to railroad right-of-way.

S-4-1: Comment acknowledged. We concur with your concerns regarding pedestrian safety. At-grade crossings are not preferable in most cases. As specific LARRMP projects move toward implementation, consultation with the PUC will be initiated to ensure concurrence in each case.

S-4-2: Comment acknowledged. We concur. See response to Comment S-4-1.

S-4-3: Comment acknowledged. We concur. We have added these mitigation measures to Section 4.12.8 (Mitigation Actions) under the Transportation discussion.
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<th>Comments</th>
<th>Responses</th>
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<tbody>
<tr>
<td>S-4-4: The City of Los Angeles should arrange a meeting with the Commission’s RCES and Metrolink to discuss relevant safety issues and, if necessary, file a GO88-B request for authority to modify an at-grade crossing. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians.</td>
<td>S-4-4: Comment acknowledged. We concur.</td>
</tr>
<tr>
<td>S-4-5: RCES should be kept informed of project’s development and meetings should be arranged with the Commission’s Rail Crossings Engineering Section as the project progresses to discuss relevant safety issues and to conduct a diagnostic review at the proposed and impacted crossing locations.</td>
<td>S-4-5: Comment acknowledged. We concur.</td>
</tr>
</tbody>
</table>

If you have any questions, please contact Varouj Jinbachian, Senior Utilities Engineer at 213-576-7081, vsj@cpuc.ca.gov, or me at 213-576-7076, ldi@cpuc.ca.gov.

Sincerely,

[Signature]

Laurence Michael
Utilities Engineer
Rail Crossings Engineering Section

C: Rob Harris, SCRA
March 26, 2007

Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

COMMENTS ON THE DRAFT LOS ANGELES RIVER REVITALIZATION MASTER PLAN AND DRAFT PEIR/PEIS

Dear Ms. Armstrong:

Thank you for the opportunity to comment on the draft Los Angeles River Revitalization Master Plan (LARRMP) and draft PEIR/PEIS documents. The potential projects within the River Corridor discussed in these documents focus on the revitalization of the Los Angeles River within the Los Angeles River Watershed. This area lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Regional Board). The Regional Board is charged with protecting and improving the surface and groundwater quality in the Los Angeles River watershed.

Regional Board staff supports the overall vision and concept of the LARRMP with the goal of providing water quality and environmental improvements to the Los Angeles River. However, because the LARRMP and draft PEIR/PEIS will serve as the general framework for future environmental documents (it is expected that other environmental documents will be tiered from this PEIR) for both the short and long term projects, it is necessary that this document provide a strong foundation for the protection of water quality in both the construction and operation phases of potential projects. Please address the following comments on the water quality related sections of the draft LARRMP and draft PEIR/PEIS.

Draft LARRMP Comments

- In Chapter 4, a number of viable approaches to enhance water quality (multi-benefit landscape treatment, treatment terraces, and landscape-based treatment at major confluences, to name a few) are recommended within the river corridor; however, reduction of pollutants at their sources throughout the watershed still needs to be addressed. Since much of watershed is outside of the plan area, the effectiveness of the proposed water quality enhancement measures will be dependent upon pollution prevention so that treatment systems and BMPs are not overwhelmed by high concentrations and loads of pollutants. The suggested treatment approaches would be most effective in concert with watershed-wide
Comments

S-5-1: Comment acknowledged. We concur. Text based on your comment has been added to the sidebar on p. 3-19 in the LARRMP.

pollution reduction activities proposed in various watershed plans. This would be an ideal time to emphasize the need for coordination and integration across plan boundaries to truly attain the goals of the plan. It is suggested that the document include a commitment statement to work in cooperation with other watershed wide plans to successfully improve and protect water quality and restore aquatic resources through out the Los Angeles River Watershed.

- Please explain why is the boundary of the proposed River Improvement Overlay (RIO) District 600 feet on either side, while the plan boundary covers one half mile on either side. This would be an opportunity to attenuate pollutant loadings before water reaches riverside treatment systems. A boundary of the RIO District consistent with the plan boundary would maximize this opportunity.

- The plan's flood control goals should be integrated with its water quality goals. For example, diverting flows to underground culverts will not address water quality issues associated with storm water and may in fact exacerbate water quality problems in the ultimate receiving water. The suggestion in Chapter 4 to ultimately use water stored outside the channel for irrigation or infiltration should be emphasized as an opportunity to address storm water quality concerns.

Draft PEIR/PEIS Comments

- A number of viable approaches to enhance water quality (multi-benefit landscape treatment, treatment terraces, and landscape-based treatment at major confluences, to name a few) are recommended within the river corridor; however, reduction of pollutants at their sources throughout the watershed still needs to be addressed. Since much of watershed is outside of the plan area, the effectiveness of the proposed water quality enhancement measures will be dependent upon pollution prevention so that treatment systems and BMPs are not overwhelmed by high concentrations and excessive loads of pollutants. Furthermore, with confluence treatment, the tributaries themselves would remain impaired. The suggested treatment approaches would be most effective in concert with watershed-wide pollution reduction activities proposed in various watershed plans. This would be an ideal time to emphasize the need for coordination and integration across plan boundaries to truly attain the goals of the plan. It is suggested that the document include a commitment statement to work in cooperation with other watershed wide plans to successfully improve and protect water quality and restore aquatic resources through out the Los Angeles River Watershed.
S-5-2: Comment acknowledged. We concur. Language based on your comment will be added in the Final PEIR/PEIS to Section 4.5.8 (Mitigation Actions and Best Management Practices).

S-5-3: We concur. Language based on your comment will be added in the Final PEIR/PEIS to Section 4.5.8 (Mitigation Actions and Best Management Practices).

S-5-4: Comment acknowledged. We concur. Additional mitigation measures based on your comments will be added to Section 4.5.8 (Mitigation Actions and Best Management Practices) in the Water Quality discussion.

S-5-5: Comment acknowledged. We concur. Language based on your comment will be added in the Final PEIR/PEIS to Section 4.5.2.3 (Potential Impact Levels).
S-5-6: Comment acknowledged. We concur. Language based on your comment will be added in the Final PEIR/PEIS to Section 4.5.2.3 (Potential Impact Levels).

If you have any questions, please contact Regional Board staff Rebeca Velga Nascimento at 213-375-0001 or rebeccav@waterboards.ca.gov.

Sincerely,

Samuel Unger, PE
Section Chief, Regional Programs
LOCAL AGENCY COMMENTS
March 19, 2007

Dr. Ara Kaspian
City of Los Angeles
Public Works Department
Bureau of Engineering
Environmental Management Division
1149 South Broadway, Suite 600
Los Angeles, CA 90015

Re: Draft Programmatic Environmental Impact Report / Programmatic Environmental Impact Statement, Los Angeles River Revitalization Master Plan

Thank you for providing the City of Burbank with the opportunity to comment on the recently completed Draft Environmental Impact Report / Environmental Impact Statement for the Los Angeles River Revitalization Master Plan. The City of Burbank agrees that there is a tremendous opportunity to improve the Los Angeles river environment to enhance recreational opportunities, habitat restoration, and improve water quality along the corridor while also preserving its flood abatement purpose. As we outlined in our response to the Notice of Preparation / Notice of Intent in April 2006, the City has some concerns related to river capacity, safety, health, property, and access that we feel will need to be addressed as specific project-level environmental review is conducted.

One of the City’s main concerns regarding activity to alter the river channel is the possibility for river channel modifications to lower the flood-carrying capacity of the LA River, which would increase the risk of flooding during winter storm events to much of southern Burbank. The City recognizes that many of the methods proposed to introduce vegetation, widen the channel or otherwise introduce natural flow into the river system can be shown to actually maintain or improve flood carrying capacity. The City requests that any project-specific studies of river modifications include hydrology and other analysis to ensure that the overall carrying capacity of the channel is maintained or enhanced.

The City is supportive of Master Plan elements to improve access to the river environment by walkers, joggers, cyclists, and equestrians, and to enhance the connections in Burbank to Griffith Park, so that the river acts as a natural progression between urban areas and nearby recreation facilities. The City requests that any connections to or across the river consider the City’s Bicycle Master Plan as well as traditional equestrian access points to Griffith Park, so that these connections are maintained or enhanced. Care should be given to consider the sensitive nature of equestrian activity so that this critical link between the horsekeeping neighborhoods in Burbank and the Griffith Park trails is maintained.
Public Comments and Responses

**Comments**

L-1-4: Comment acknowledged.
L-1-5: Comment acknowledged. We concur.
L-1-6: Comment acknowledged.
L-1-7: Comment acknowledged. We concur.
L-1-8: Comment acknowledged. We concur.

While the Master Plan does not include areas adjacent to Burbank in the study of Opportunity Areas performed in the EIR/EIS, we request that any study of the riverfront property in the “Poliwog” area of the Griffith Park Family Trust adjacent to Walt Disney Studios at the terminus of Keystone Street near Riverside Drive maintain the historical equestrian uses that occur in that area. Also, any plans to redevelop the river frontage along Riverside Drive adjacent to Johnny Carson Park should integrate with the park facilities located in that area. Finally, there are a number of large private properties located adjacent to the river in Burbank (Walt Disney and Warner Brothers Studios). Any improvement plans for the river in this area should recognize and protect these existing studio uses near the river channel.

Finally, as we outlined in our response to the Notice of Preparation last year, we are concerned with the overall increased exposure of the river areas to additional people, and how those decisions may affect the safety of the river. Any plans to open the river to recreational or other activities should include a review of the safety aspects of increasing the exposure of people to floodwater conditions. Many of the strategies included in the Master Plan are expected to calm the flow of water during non-peak times. Nonetheless, plans to open the channel to recreation need to consider the safety implications of these policy decisions. Also, the introduction of pooling water could increase the risk of water borne insects, so any plan to calm the river channel should consider strategies to reduce this risk, preferably through creation of natural riparian habitat that minimizes pooling of stagnant water.

Again, thank you for the opportunity to comment on this ambitious Los Angeles River Revitalization Master Plan. The City of Burbank looks forward to working with the other project stakeholders to improve this valuable regional resource as an enhanced recreation and natural habitat area. If you have any questions, please feel free to contact me at 818.238.5270 or via email at dkriske@ci.burbank.ca.us

Sincerely,

David Kriske  
Senior Planner, Community Development Department

c. Eric Hansen, Park, Recreation, and Community Services Director  
Greg Herrmann, Chief Assistant Community Development Director  
Barbara Lazar, Senior Planner
L-2-1: Comment acknowledged. Your comment has been passed on to the LARRMP planning team. Similar riverfront improvements have taken place along the entire Los Angeles River. Some adjacent cities are or have implemented revitalization plans, for example the City of Glendale’s Riverwalk and the City of Long Beach’s RiverLink projects. The proposed Joint Powers Authority (JPA) would include the County of Los Angeles and could be expanded to include additional jurisdictions in the future. See page 9-9 of the LARRMP.
March 26, 2007

Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

Re: Comments on Draft EIR/EIS and Master Plan
Prepared for Los Angeles River Revitalization Master Plan

Dear Ms. Armstrong:

The City of Glendale Planning Department appreciates this opportunity to comment on the above referenced project, relative to impacts within the City of Glendale. We have reviewed the Los Angeles River Revitalization Master Plan (LARRMP) and corresponding environmental impacts report/environmental impact statement (EIR/EIS) and would like to provide the following comments.

1. Appropriate traffic impact analyses should be conducted at the project level to identify potentially significant and adverse impacts to any transportation infrastructure/facilities in the City of Glendale. Master Plan projects requiring such analyses should include changes to land use as well as changes to transportation infrastructure/facilities. Both short-range and long-range impacts should be addressed utilizing significance thresholds provided by the City of Glendale.

2. All Master Plan alternatives should include the transportation infrastructure/facilities comprising the approved “State Route 134/San Fernando Road Interchange Project (Including Fairmont Avenue Flyover),” City of Glendale Traffic & Transportation Division, illustrated in Exhibit A attached. This is an approved project scheduled for completion in 2009-2010.

3. As an alternative to closing the at-grade railroad crossing at Doran Street (located east of the Los Angeles River, south of State Route 134, and west of San Fernando Road) and constructing a new at-grade rail crossing at California Avenue (located approximately 1,250 feet south of Doran Street), staff respectfully requests that said closure of the Doran Street at-grade rail crossing be studied in combination with the reconstruction of Doran Street over San Fernando Road in a manner similar to the aforementioned Fairmont Avenue Flyover.
Comments

Studies conducted by the Traffic & Transportation Division indicate the Doran Street Flyover would provide vehicular access to properties located east of the Los Angeles River, south of State Route 134, and west of San Fernando Road. In addition, the Doran Street Flyover would pass beneath State Route 134 to intersect the Fairmont Avenue Flyover, thereby enhancing local access to the State Route 134/San Fernando Road interchange. Exhibit B attached illustrates this Doran Street Flyover.

As projects are proposed under the LARRMP, we would appreciate the opportunity to review and comment on each one at that time. If you have any questions please, contact me at (818) 548-2140. Thank you for this opportunity to provide comment.

Sincerely,

Erik Krause
Senior Planner

EK:ek

Cc: Hassan Haghani, Acting Director of Planning
    Philip Lanzaflame, Director of Development Services
    Jaro Baghdanian, Traffic and Transportation Administrator
March 26, 2007

Dr. Carol Armstrong  
City of Los Angeles  
1149 S. Broadway Street, Suite 600  
Los Angeles, CA 90015  

Dear Dr. Armstrong:

NOTICE OF AVAILABILITY OF A  
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT/  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIR/PEIS) FOR THE  
LOS ANGELES RIVER REVITALIZATION MASTER PLAN (LARRMP)

The Department is in support of the City’s extensive efforts to revitalize the Los Angeles River. There is an ever increasing demand for parks, open space, and recreational facilities in the Los Angeles basin and the County, as well as the City, is committed to provide for the public in this arena.

One of the highly prized recreation facilities in the County is its Trail System. The County’s proposed “Los Angeles River Trail Extension” (#2), as shown on the enclosed trails brochure, is a multi-use equestrian and hiking trail which overlaps the “Los Angeles River Corridor” and “Opportunity Areas” as depicted in Figure 1-1, “River Corridor” of the PEIR/PEIS. The enclosed copy of Figure 1-1 highlights the overlapping project areas. We estimate the overlapping area to be 6 – 10 miles along the river. The Department welcomes the opportunity to partner with the City on the development of this shared area into another multi-use equestrian and hiking trail to be enjoyed by countless others.

Thank you for including this Department in the review of this document. If we may be of further assistance on this project, please contact Mr. Bryan Moscardini at 213-351-3513 or bmoscardini@parks.lacity.gov.

Sincerely,

Larry R. Hensley, Chief  
Planning Division

Enclosures  
c: Norma Garcia, Park Deputy, First Supervisory District
L-5-1: Comment acknowledged. This comment was discussed with the LARRMP team and the City of Los Angeles BOE. The PEIR/PEIS addresses potential environmental effects associated with construction and operation/maintenance of the array of future LARRMP implementation projects that could be undertaken within the River Corridor. Because obtaining funds necessary for ongoing operation and maintenance activities associated with the implementation of the LARRMP is not expected to have environmental impacts, this topic is not addressed in this PEIR/PEIS. Additionally, the LARRMP’s planned Joint Powers Authority is intended to streamline these functions, resulting in greater cost efficiencies. These cost performance measures would be subsequently tracked as a function of the JPA, should it be established. However, because establishment of the JPA is an administrative action, such costs were not addressed in the PEIR/PEIS.

L-5-2: Comment acknowledged. This comment was discussed with the LARRMP team and the City of Los Angeles BOE. See response directly above. Cooperative agreements are also planned future administrative actions and thus were not addressed in the PEIR/PEIS.

L-5-3: Comment acknowledged. This comment was discussed with the LARRMP team and the City of Los Angeles BOE.

L-5-4: Comment acknowledged. The PEIR/PEIS recognizes that the engineering approach discussed in the LARRMP intends to incorporate thorough study of the hydrologic and hydraulic effects of alternative designs as specific channel modification projects become identified. The PEIR/PEIS points out in Section 4.5.1.2 (Approach and Methodology - of the Hydrology, Floodplain, and Water Quality discussion), the need for modeling the potential hydrological effects of future projects. Language will be added to this section to include potential hydraulic effects as well.

L-5-5: Comment acknowledged. In the Final PEIR/PEIS, language based on your comment will be added to the recommended
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<th>Comments</th>
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<td>L-5-5 (cont.): mitigation measures in Section 4.5.8 (Mitigation Measures and Best Management Practices – of the Hydrology, Floodplain, and Water Quality discussion).</td>
<td>L-5-6: Comment acknowledged. It is anticipated that as future projects are identified that might involve the channel configurations you refer to, that due consideration will be given to ensuring that such designs do not hamper swift water rescues in any way. In the Final PEIR/PEIS, language in this regard will be added to Section 4.11.2.1 (General Types of Impacts and Mitigation) to help ensure these design criteria are included.</td>
</tr>
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</table>
Public Comments and Responses

Comments

L-5-7: Comment acknowledged.

L-5-8: The LARRMP planning team indicates that it was discussed during two meetings with the City, the Corps, the County DPW, and the consultants, that the hydraulic data used to develop the preliminary concepts in the Plan was based on the hydrology in the LACDA study (COE, 1991) as well as the updated HEC-RAS data that was developed by the Corps in 2004/2005. The applicability of both County and Corps data will be further discussed in the subsequent Army Corps Los Angeles River Ecosystem Restoration Feasibility Study, which will test the recommendations of the LARRMP.

L-5-9: Hydraulic modeling will take place once project specific efforts are underway for implementing the LARRMP. The hydrology and hydraulic data would all be compatible with established County and Corps data. We concur that the revitalization effort does not currently extend into the River reach constructed downstream as part of the LACDA project in the 1990’s. See response directly above regarding the subsequent Army Corps of Engineers Feasibility Study.

L-5-10: Comment acknowledged.

L-5-11: Comment acknowledged.

L-5-12: Comment acknowledged. The City welcomes the opportunity to further discuss any aspect of the LARRMP with the County.

L-5-13: Comment acknowledged. We concur. The impacts referred to would need to be analyzed through more detailed hydraulic modeling and further environmental studies that would accompany the implementation of future LARRMP projects.
L-5-13: Comment acknowledged. The future South Gate Riparian Habitat Restoration project rely on water supplied by the River and may be impacted if flow and velocity are changed.

L-5-14: Comment Acknowledged. The potential impacts from ponded water will be added to the discussion of potential impacts to biological resources in Section 4.7.2.1 (River Channel Modification Measures). Also, the future evaluation of these potential impacts at the project level will be added to the recommended mitigation actions in Section 4.7.8 (Potential Mitigation Actions and Best Management Practices).

L-5-15: Comment acknowledged. This is the approach to be taken by the City in moving forward towards realizing the vision of the LARRMP.

L-5-16: Comment acknowledged. All proposals will be reviewed for consistency with existing applicable guidelines and standards. Suitable language will be added to Section 4.9.2.4 (Mitigation Actions) in the Recreation section.

L-5-17: Comment acknowledged. All proposals will be reviewed for consistency with existing applicable guidelines and standards. Suitable language will be added to Section 4.9.2.4 (Mitigation Actions) in the Recreation section.

L-5-18: Comment acknowledged. All proposals will be reviewed for consistency with existing applicable guidelines and standards. Suitable language will be added to Section 4.9.2.4 (Mitigation Actions) in the Recreation section.

L-5-19: Comment acknowledged. All proposals will be reviewed for consistency with existing applicable guidelines and standards. Suitable language will be added to Section 4.9.2.4 (Mitigation Actions) in the Recreation section.

L-5-20: Comment acknowledged. Examples of these types of warning measures are discussed in Section 4.11.2.2 (Potential Impact Levels). A better placement for this discussion might be the preceding Section 4.11.2.1 (General types of Impacts and Mitigation), under the discussion of Los Angeles River Water Safety.
Comments

If you have any questions, please call me at (626) 458-7150.

Suk

CC: "Contreras, Danielle" <DCONTRERAS@dpw.lacounty.gov>
Ms. Carol Armstrong, Project Manager
Los Angeles River Revitalization Master Plan
City of Los Angeles Department of Public Works, Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, CA 90015

Dear Ms. Armstrong:

DRAFT LOS ANGELES RIVER REVITALIZATION MASTER PLAN AND DRAFT
PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT / PROGRAMMATIC
ENVIRONMENTAL IMPACT STATEMENT
CITY OF LOS ANGELES

Thank you for the opportunity to review the draft Los Angeles River Revitalization Master Plan (LARRMP) and its related draft Programmatic Environmental Impact Report/Programmatic Environmental Impact Statement (DPEIR/PEIS). The general study area of the LARRMP includes one-half mile on each side of the 32-mile stretch of the Los Angeles River within the City of Los Angeles (City) from Owensmouth Avenue to Washington Boulevard. The study area also includes five opportunity areas (Canoga Park, River Glen, Taylor Yard, Cornfields-Chinatown, and downtown industrial). River channel modifications proposed include open space development, parks, green streets, paseos, trails, parkways, and other river revitalization opportunities.

The LARRMP is consistent with the mission and vision of the Los Angeles River Master Plan, an environmental planning document that focuses on implementing a multi-faceted vision of the Los Angeles River that includes environmental, aesthetic, and recreational enhancements and economic development in addition to the primary objective of flood protection. However, there are a number of issues that we would like the City to address in greater detail as the City moves forward with their planning efforts. We offer the following comments for your consideration.

The design data used to develop the preliminary concepts presented in the plan, including, but not limited to, terraced channels and bypass culverts, are based on the original design data for the Upper Los Angeles River. The original data is based on the hydraulic pertinent data tables from the United States Army Corps of Engineers'
Hydrology & Hydraulics Section Permit Manual. Proposals carried forward from this plan may need to consider the feasibility of increasing channel capacity to that of the Los Angeles County Drainage Area (LACDA) study in an effort to maintain or enhance hydraulic capacity.

The proposals suggested in the plan, if implemented, may significantly impact the current maintenance routines that have been established for the river corridor within the City. For example, proposals that are focused on water quality improvements, off-corridor attenuation measures, and increased vegetation within the channel area (including terraced slopes) will increase maintenance costs. Further, creating and/or restoring natural habitat within the channel area may limit the affected maintenance entity's ability to maintain the channel in the most cost-effective manner and may subject the affected maintenance entity to additional mitigation requirements. Regulatory requirements may restrict the affected maintenance entity's ability to adequately maintain vegetation added to the channel and these restrictions may result in the capacity of the channel being compromised. Lastly, proposals to construct access roads at or below the design flood level are not recommended because these proposals may severely hamper the affected maintenance entity’s ability to perform various maintenance activities, especially during emergencies and high-channel flows. All access roads, maintenance roads, and invert access roads should be constructed in accordance with accepted design standards with consideration also given to emergency crews that need to access the channel to perform swift water rescue functions.

The plan should propose mechanisms, such as Cooperative Agreements, for addressing incremental increases to the cost of maintaining the channel if the proposed changes are made to the corridor area. The suggested Cooperative Agreements should also address the potential increases in liability that may result from encouraging public access to the channel invert areas and the right of way associated with the proposed daylighted storm drains. Further, the plan may want to consider how to implement warning systems within the river corridor area to help users differentiate between times when the river is or is not safe for public access.

In addition to the impacts to the river corridor within the City, proposals suggested in the plan, if implemented, may significantly impact the 19 miles of the Los Angeles River not located within the City. Impacts include, but are not limited to, potential damage to downstream ecosystems and restoration efforts, potential increases in maintenance costs, and potential changes to the downstream water surface elevation. To fully understand the impacts the proposals suggested in the plan will have on the river system, the entire 51-mile system, including the proposed changes, will need to be modeled extensively from both a hydraulic and hydrologic standpoint.

L-6-1: Comment acknowledged. The impacts related to the maintenance routine are the subject of the proposed Joint Powers Authority (JPA).

L-6-2: We concur. This is an issue to be addressed by the JPA.

L-6-3: All LARRMP-related specific projects will be implemented with subsequent environmental review that would analyze impacts downstream. Specific measures will be taken at that time to prevent, minimize or avoid adverse downstream impacts.
The proposals suggested in the LARRMP may significantly impact downstream ecosystems and restoration efforts. Areas such as Dominguez Gap and Golden Shore Marine Reserve in the City of Long Beach and the future South Gate Riparian Habitat Restoration project rely on water supplied by the river and may be impacted if flow and velocity are changed. Further, proposals to pond water within the river at various locations throughout the City through the use of rubber dams should be evaluated to determine their impacts to ecosystems that may develop upstream, downstream, and within the ponded areas, especially, when the water held by the dams is released.

Proposals suggested within the plan, if implemented, have the potential to change the water surface elevation in the lower reaches of the river. As a requirement associated with LACDA project, no efforts associated with river improvement can result in an increase to the water surface elevation in the downstream reaches of the river. To manage this requirement, the LACDA Stormwater Management Plan is being developed by the United States Army Corps of Engineers and the Los Angeles County Flood Control District. Prior to implementation, all proposals to change the hydraulic and hydrologic function of the river must be reviewed to ensure that the proposals are consistent with LACDA Stormwater Management Plan and do not conflict with efforts to maintain the current water surface elevation in the lower reaches of the river. Also, the City will need to consider how the water surface elevation in the lower reaches may be impacted by surface runoff that enters the river after the water leaves properties located within the proposed River Improvement Overlay (RIO).

As proposals within the plan move forward for implementation, the proposals should be refined through a stakeholder driven process to ensure that the needs of current and future river users are addressed and satisfied. Additionally, proposals that move forward should build upon the existing body of work that has been done along the river corridor and should, at a minimum, adhere to the following:

- All proposals should be consistent with the Los Angeles River Master Plan.
- Landscaping within the river corridor should be consistent with the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.
Ms. Carol Armstrong  
March 27, 2007  
Page 4

L-6-7

- Signage within the river corridor should be consistent with the Los Angeles River Master Plan Sign Guidelines.
- Bikeway proposals should be consistent with guidelines specified for the development of Class I Bikeways.
- All proposals that involve making the corridor more accessible to the public should comply with guidelines developed through the American Disabilities Act.

We are committed to enhancing the quality of life of residents, visitors, and those who conduct business in the County of Los Angeles. Therefore, we welcome the opportunity to discuss our comments further and ask that we continue to be involved in efforts to move the LARRMP’s proposals forward. We also recommend that the City expand efforts to gather feedback from the County of Los Angeles by submitting the LARRMP and its related DPEIR/PEIS to the County of Los Angeles Chief Administrative Office for circulation among all impacted County of Los Angeles departments. To accommodate this recommendation, it may be advisable to extend the comment period to give all affected departments the opportunity to make recommendations before the plan and its related environmental documents move forward. If you have any questions, please contact Mr. Vik Bapna at (626) 458-4363 or vbapna@dwp.lacounty.gov.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works

MARK PESTRELLA  
Assistant Deputy Director  
Watershed Management Division

HS:sw  
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bc: Flood Maintenance Division (Lee, Vander Vis, Hildebrand)  
Land Development Division (Hunter, Chong)  
Water Resources Division (Kubomoto)
Letter L-7

Los Angeles Unified School District
Office of Environmental Health and Safety

March 27, 2007

City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, CA 90015
carol.simsetvang@lacity.org

SUBJECT: Los Angeles River Revitalization Master Plan
Draft Programmatic EIR/Programmatic EIS
State Clearinghouse No. 2006041050

Thank you for giving the Los Angeles Unified School District (LAUSD) the opportunity to comment on the above-referenced document. The general area of study extends one-half mile on each side of a 32-mile stretch of the Los Angeles River within the City of Los Angeles beginning at Owensmouth Avenue in Canoga Park (at the confluence of Bell Creek and Arroyo Calabasas) and continuing downstream to Washington Boulevard, near the northern boundary of the City of Vernon. The study area is referred to as the River Corridor.

As you are aware, there are 73 existing LAUSD schools located within 0.5 mile of the Los Angeles River Corridor. Our primary goal is to: 1) ensure the health and safety of students, teachers, and staff, and 2) minimize any disruption to the learning environment. As such, our office looks forward to reviewing each phase of the Los Angeles River revitalization on a project-by-project basis and requests that the LADWP forward all project-related documents to our office when they become available for public review.

In addition, we are providing information on planned schools that you may not be aware of, so that you may include it in your analysis for individual projects. The following proposed new school sites are within a 0.5 mile of the River Corridor:

- South Region High School No. 4 (SRHS #4)
- Central Region High School No. 13 (CRHS #13)
- South Region High School No. 8 (SRHS #8)
- South Region High School No. 9 (SRHS #9)

Construction is scheduled to start in the second quarter of 2008 for SRHS #4 and CRHS #13. These schools are scheduled for occupancy in the third quarter of 2011. Construction of SRHS #8 is scheduled for the second quarter of 2009, with school occupancy scheduled for the third quarter of 2012.

L-7-1: Comment acknowledged.
L-7-2: Comment acknowledged.
Construction of SRHS #9 is scheduled for the second quarter of 2010, with school occupancy scheduled for the third quarter of 2012.

Maps and information related to these schools can be retrieved at [http://laschools.org](http://laschools.org). If you need any additional information, please do not hesitate contacting our office.

Respectfully,

Glenn Striegler – PG
Environmental Assessment Coordinator
glenn.striegler@lausd.net

c: Pat Scharen – Deputy Director LAUSD OEHS
Alexander Morelan – Site Assessment Manager LAUSD OEHS
Bill Piazza – Environmental Assessment Coordinator LAUSD OEHS
Randi Cooper – Senior Project Manager for CEQA New Schools Construction Program
Letter L-8

March 19, 2007

Dr. Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Public Works Department, Bureau of Engineering
1149 S Broadway, Suite 600
Los Angeles, CA 90015

Dear Dr. Armstrong:

The Los Angeles County Metropolitan Transportation Authority (Metro) has received and reviewed the Draft PEIR/PEIS for the Los Angeles River Revitalization Master Plan. While Metro congratulates your efforts, there are several areas of our agency's concern that must be addressed.

With regard to the Canoga Park Opportunity Area:

1. The Canoga Park Opportunity Area encroaches on and directly affects Metro-owned right-of-way along Canoga Avenue, which has been designated as the route for the Canoga Extension of the Metro Orange Line (FEIR scheduled to be released in September 2008). The following components will have a direct impact:
   - Channel Modifications, Parks, Green Streets (both arterial and local), Paseos and Promenades, Bikeways and Trails, Pedestrian River Crossings and Bridge Underpasses, and Gateways.

2. The Canoga Extension of the Metro Orange Line as well as other potential Bus Rapid Transit Projects located in the San Fernando Valley are described in Metro's Board adopted Long Range Transportation Plan and Short Range Transportation Plan. These documents were not reviewed as part of the development of the Draft PEIR/PEIS, nor was Metro consulted regarding the direct impacts the River Revitalization Plan might have in this area.

3. The existing Metro Orange Line may be affected by Regional Gateways, Paseos, and Green Streets (both arterial and local):
   - For safety reasons, bus right-of-way and facilities must be kept secure from public trespassing.

4. Metro acknowledges the need for additional pedestrian and bike enhancements in the area, and has plans to extend the Class I bikeway and pedestrian path from the existing Metro Orange Line, along Metro owned right-of-way to the Chatsworth Metrolink Station, in conjunction with the construction of the Canoga Extension.

With regard to the Taylor Yards-Cornfields/Chinatown and Downtown Industrial Opportunity Areas:

5. The PEIR/PEIS should consider proximity of Bridge Underpasses, Neighborhood Gateways, and Regional Gateways to the Metro Gold Line as it crosses the LA River:
   - The safety of bridges over the Los Angeles River used by bus and rail lines must be maintained and protected from flooding.
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<th>Comments</th>
<th>Responses</th>
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<td>L-8-6: Metro’s rail yards and shops for the Metro Gold Line at 1800 Baker Street and the Metro Red Line at 320 S. Santa Fe Avenue are located adjacent to the Los Angeles River. Rail right-of-way and facilities must be kept secure from trespass by the public for safety.</td>
<td>L-8-6: Comment acknowledged.</td>
</tr>
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<td>In addition, the following recommendations were conveyed during the NOP process but were not specifically addressed in the Draft PEIR/PEIS. Those recommendations were as follows:</td>
<td>L-8-7: Comment acknowledged.</td>
</tr>
<tr>
<td>L-8-7: Bike paths should be included in the Plan, however, these may not cross bus or rail facilities at-grade.</td>
<td>L-8-8: Comment acknowledged. We concur.</td>
</tr>
<tr>
<td>L-8-8: Changes to the Los Angeles River must not compromise the integrity of the Metro Red Line subway tunnel along Lankershim Boulevard in North Hollywood through changes in groundwater levels.</td>
<td>L-8-9: Comment acknowledged. The LARRMP itself does not change any land use designations. Subsequent community planning activities may affect land use designations, but these would be implemented according to prevailing public involvement procedures, including consultation with Metro.</td>
</tr>
<tr>
<td>L-8-9: New land use designations created by the River Revitalization Plan may pose restrictions and/or limitations on Metro’s development of its properties adjacent or in close proximity to the river.</td>
<td>L-8-10: Comment acknowledged.</td>
</tr>
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<td>L-8-10: Speed and frequency of bus and rail service could be impacted by project development.</td>
<td></td>
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</table>

Metro looks forward to reviewing the Final Programmatic EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman  

Sincerely,

[Signature]

Susan F. Chapman  
Program Manager, Long Range Planning

Cc: Walt Davis, Laurel Kopanski
Public Comments and Responses

Letter L-9

Comments

22 March 2007

Ms. Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

RE: SCAG Comments on the Draft Joint Programmatic EIR/PEIS (PERPEIS) for the Los Angeles River Revitalization Master Plan (LARRMP) project
SCAG No. 120070049

Dear Ms. Armstrong,

Thank you for submitting the Draft Joint Programmatic EIR/PEIS (PERPEIS) for the Los Angeles River Revitalization Master Plan (LARRMP) project to the Southern California Association of Governments (SCAG) for review and comment. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG’s responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff reviewed the aforementioned PERPEIS, and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15126). The proposed project considers more than 500 dwelling units.

CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 (d)). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG’s Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Compass Growth Vision that may be applicable to your project are outlined in the attachment. We expect the Final PERPEIS to specifically cite the appropriate SCAG policies and address the manner in which the project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer them to your Final PERPEIS. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the proposed project.

SCAG’s Compass Growth Vision, adopted in 2004, encourages better relationships between housing, transportation, and employment. For a clearer understanding of the intent and possibilities with Compass, please consult our website, www.totalcompass.org in addition to the guidance offered in this letter.

Please provide a minimum of 45 days for SCAG to review the Final PERPEIS when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 235-1019. Thank you.

Sincerely,

Jill Eggerman
Associate Regional Planner, Interagency Review Unit

Responses

L-9-1: Comment acknowledged. We concur.

L-9-2: There may conceivably be inconsistencies between LARRMP and the existing plans. As the plan goes through its next phase of developing land use, planning, and development guidelines, it will be clearer what these inconsistencies might be. The Plan recognized this possibility and conceded that community plans and the General Plan Framework may have to be revisited subsequent to the effort of developing the River Improvement Overlay (RIO) district. This process is highly stakeholder-driven and will involve preparation of additional environmental review. The Community Plan update process, which will follow the adoption of this Plan, will enable assessment of impacts on housing, loss of affordable housing, jobs, and will examine issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. Again, this is a stakeholder-driven process that is best suited to gauge community support. The overall policy of this Plan is to encourage the retention and strengthening of stable residential areas, and to balance these with a long-term program to acquire properties for flood protection and River improvement. All measures, including inclusionary zoning, equitable distribution of benefits, and rent and job stabilization strategies would be available to the community as they take part in developing their Community Plan revisions. The Plan does not advocate net removal of any affordable housing without proper compensation, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles. Concurrent with the adoption of this plan, the project recommends that the City Planning Department initiate review of the General Plan, Community Plan, and/or Specific Plan requirements, including public outreach, to ensure conformity with the goals and objectives and policy recommendations contained in the LARRMP. Specific land use measures and changes will be evaluated at that time. Design standards and guidelines with the River Improvement Overlay (RIO) district will also be evaluated with public participation and additional environmental review.
<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
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<tbody>
<tr>
<td>L-9-3: Comment acknowledged. See previous response.</td>
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<tr>
<td>L-9-4: Comment acknowledged.</td>
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<tr>
<td>L-9-5: CEQA does not require additional review at the Final EIR stage. The 45-day public review period is a CEQA requirement for the draft document. We have already exceeded that requirement.</td>
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</tbody>
</table>
L-9-6: Comment acknowledged.
L-9-7: It is the policy of the City of Los Angeles, through its General Plan and Community Plan revisions to be consistent with SCAG’s Regional Growth Plan, SCAG population projections, and SCAG’s Regional Transportation Plan. All of these plans are developed to be internally consistent.

L-9-8: Comment acknowledged. See response to L-9-2.
L-9-8: The LARRMP is focused on achievement of minimizing the cost of infrastructure including creation of parks, environmental enhancement and partial restoration, creation of trails, support of non-motorized transportation system and community revitalization through this and subsequent efforts. Additionally, the proposed 3-tiered governance structure is intended to result in a streamlined, more efficient system of public service delivery, which would be consistent with SCAG policy 3.09.

L-9-10: Establishment of a governance structure is intended to streamline functions, minimize red tape, and expedite permitting processes now involving multiple jurisdictions, including the County of Los Angeles, the City of Los Angeles, and the U.S. Army Corps of Engineers. Within the City, establishment of the Los Angeles River Special Project Office within the Department of Public Works would also contribute to expediting the implementation process.

L-9-11: Comment acknowledged.
Public Comments and Responses

L-9-11

22 March 2007
Ms. Carol Armstrong
Page 5

“Both adverse and beneficial transportation impacts could result from implementing the two main types of river channel modification measures (nonvelocity-reducing and velocity-reducing) and the suite of open space measures described in Chapter 2. Potential adverse impacts include short-term impacts from construction activities, such as truck traffic and lane closures. Long-term adverse impacts include increased traffic and parking demand due to more visitors to the areas. Green streets can also restrict visibility if the plants are not kept pruned, which in turn could cause an increase in traffic accidents. Acquiring ROW to develop park spaces or terracing along the river could impact arterial streets and roadways. On the beneficial side, green streets that add landscaping and employ traffic calming measures, such as medians, pedestrian bridges, speed humps, raised crosswalks, and textured paving, would generally provide positive impacts. Implementing safe alternative transportation opportunities, such as those for pedestrians and cyclists, would also create positive impacts.”

SCAG concludes that the program would be consistent with Policy 3.12.

L-9-12

3.14 Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.

SCAG staff comments: It would be helpful if the Final EIR would provide a discussion and address the manner in which the program is supportive or detracts from the achievement of any plans to increase density of future development located at strategic points. Based on the information provided in the Draft PEIR/PEIS, we are unable to determine if the program is consistent with Policy 3.14. Please address this in the Final EIR.

L-9-13

3.19 SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.

SCAG staff comments: The Draft PEIR/PEIS discussed the consistency of the proposed program with Policy 3.19 of SCAG’s RCPO. Section 4.8, at page 4-65 stated:

“At a programmatic level, any of the identified Open Space Development Measures could result in inconsistencies with the adopted land use/density designation in the General Plan, Community Plan, regional open space plan, specific plan for the site, or adopted environmental goals and policies of other applicable plans. If in the future an Open Space Development Measure is considered for implementation during the subsequent community planning process at a specific site, further analysis to identify all relevant land use plans and policies and to evaluate the measure’s consistency with those plans and policies will be required. Evaluation of consistency and compatibility should include the Master Plans in place for the Los Angeles River, Sepulveda Basin, and Griffith Park and the General Plans for Rio De Los Angeles and Los Angeles State Historic Parks in the River Corridor, where applicable. Consistency and compatibility with the IRWMP and any projects approved for funding therein should also be evaluated. Any proposed land use that is not consistent with existing land uses as approved in the area’s Community Plan could result in high and potentially significant land use impacts. If significant impacts are identified, mitigation measures will need to be identified and evaluated to reduce potential impacts to less than significant levels.”

L-9-12: Comment acknowledged. See response to Comment L-9-2.

L-9-13: Comment acknowledged.
SCAG concludes that the program would be consistent with Policy 3.19.

3.20 Vital resources as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals should be protected.

**SCAG staff comments:** The Draft PEIR/PEIS discussed the consistency of the proposed program with Policy 3.20 of SCAG's RCPG. Section 4.7.2.3 at pages 4-52 and 4-53 stated:

"Overall, the levels of adverse impacts on biological resources from implementing the LARRMP river channel modification measures and the open space development measures are expected to be low to moderate. Most of the river channel has minimal habitat values, except for Sepulveda Basin and through the Glendale Narrows. Higher value habitats should be avoided to the extent possible and/or should be incorporated into project designs. Channel modifications in the Sepulveda Basin and the Glendale Narrows areas would potentially have short-term high and significant adverse impacts. Adverse impacts on wetlands and higher value habitat in the stream channel would be offset by creating and enhancing these habitats. Construction-related impacts would be temporary and minor. No threatened or endangered species are known or expected to inhabit the corridor. On this basis, therefore, a net gain of ecological benefits is expected by implementing the LARRMP measures. Beneficial impacts on biological resources have the potential of being major and significant, depending on the amount and type of habitat constructed.

Implementing these measures, especially the river channel modifications, would contribute to the cumulative amount of fish and wildlife habitat in the River Corridor, along with contributing to the amount of open space in the Los Angeles basin."

SCAG concludes that the program would be consistent with Policy 3.20.

3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.

**SCAG staff comments:** Section 4.16 of the Draft PEIR/PEIS discussed cultural and paleontological resources, the potential impacts that may result from implementation of the LARRMP, as well as mitigation actions and best management practices. Section 4.16.8 at pages 4-199 and 4-200 stated:

Further project-level investigations, assessments, and evaluations to identify, evaluate, and determine levels of effects on cultural resources are required prior to implementing LARRMP revitalization measures. When specific LARRMP revitalization measures are considered for analysis, the Corps and the City may choose to enter into a programmatic agreement with the NHPA and others to satisfy the requirements of Section 106 of the NHPA for all or portions of the proposed master plan. Because many of the LARRMP revitalization measures and cultural resource impact issues are common to the whole project, a programmatic agreement can set standards and expectations for consistently addressing cultural resources for the plan implementation and avoiding redundant consultations. Alternatively, the Corps and the City may choose to address...
L-9-15

22 March 2007
Ms. Carol Armstrong
Page 7

L-9-16

Comments

L-9-16: Comment acknowledged.

L-9-17: Comment acknowledged.

Responses

3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.

SCAG staff comments: The Draft PEIR/PEIS discussed mitigation actions and best management practices for hydrology, floodplain, and water quality in section 4.5.8, and mitigation actions and best management practices for geology, soils, and seismic hazards in section 4.4.8. Should those mitigation measures be adequately implemented, the program would be consistent with Policy 3.23.

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

L-9-17

3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.

SCAG staff comments: The stated Project Goals and Objectives, in the Executive Summary of the Draft PEIR/PEIS for the LARRMP, on page ES2 include:

* Establish guidelines for environmentally sensitive urban design, land use, and development for the Los Angeles River, that will create economic development opportunities to enhance and improve river-adjacent communities, this would be accomplished by providing open space, housing, retail spaces (such as...
L-9-17: As explained in our response to Comment L-9-2, above, there will be subsequent specific projects and programs that will be developed through community planning efforts that would be able to address issues, such as community-based shuttle services, possible telecommunications, and other specific programs referenced in SCAG Policy 5.07.

L-9-18: The LARRMP will conform to the region’s Air Quality Management Plan (AQMP). Specific projects that will be developed subsequent to the approval of this concept level Plan will have their own environmental documents that will ensure compliance with South Coast Air Quality Management District requirements as well as the current AQMP, and other applicable regional, air basin, county, subregional, and local plans affecting air quality, land use, transportation, and economic relationships.

L-9-20: Comment acknowledged.
Comments

22 March 2007
Ms. Carol Armstrong
Page 9

9:02 Increase the accessibility to open space lands for outdoor recreation.

SCAG staff comments: Please see comments under 9.03.

9.03 Promote self-sustaining regional recreation resources and facilities.

SCAG staff comments for 9.01, 9.02, and 9.03: Section 2.3 of the Draft PEIR/PEIS discussed the Open Space Development of the LARRMP.

The main goal in implementing the LARRMP open space development measures is to eventually develop a continuous greenway along the entire River Corridor that connects adjacent and surrounding communities to the river, while enhancing the habitat, recreation opportunities, aesthetics, water quality, and quality of life. The intention is to employ a suite of open space development measures in selected locations that physically highlight and increase awareness of revitalization, while improving access to the river.

Three primary objectives were established in the LARRMP for employing the suite of open space measures, as follows:
1. Establishing and enhancing “greenway connections” along local and main streets, through underpasses, and over bridges to parks, natural areas, public transportation, schools, and other public resources.
2. Providing “greenway expansions” of open space opportunities by developing new local and area parks, habitat areas, and recreational facilities; and 3. Developing “greenway extensions” of the River Corridor greenway into surrounding communities by establishing greenways on river tributaries, “greening” selected local and major streets, and constructing new pedestrian bridges.

For discussion and evaluation in this PEIR/PEIS, the open space development measures discussed in the LARRMP have been organized under eight categories, as follows:
• Parks
• Green streets
• Paseos (covered walkways/river access points) and promenades
• Trails and bikeways
• Pedestrian river crossings
• River loops
• Gateways
• Water quality and habitat

The above-stated goal and objectives regarding the Open Space Development measures for the LARRMP Draft PEIR/PEIS are consistent with SCAG policies 9.01, 9.02, and 9.03.

Responses

L-9-21: Comment acknowledged.

9.08 Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.

SCAG staff comments: Section 4.7.8 of the Draft PEIR/PEIS discussed the consistency of the proposed program with Policy 9.08 of SCAG’s RCPG. Page 4-50 stated:

“As specific LARRMP implementation projects are identified and undertaken in the future, site-specific biological surveys would likely need to be conducted to better define biological resources, such as the presence of and potential impacts on wetlands and high-value habitats. Future project plans and designs would need to be coordinated with appropriate resource agencies and land managers to ensure to the greatest extent possible that high value habitats could be accounted for and their functions and values enhanced.”

Should the future project plans and designs carry out above-stated measures, the PEIR/PEIS is consistent with Policy 9.08.
L-9-22: Comment acknowledged. The LARRMP incorporates by reference and tiers off the Integrated Resources Plan (IRP) project approved by the City in 2006. In addition, it incorporates and cites the County’s Integrated Regional Water Management Plan (IRWMP). The approved IRP envisions management of up to 42 percent of the dry weather and 47 percent of the wet weather urban runoff generated by the City. These measures include in-cisterns on public properties (e.g., schools), on-site wet weather runoff treatment and percolation on public properties (e.g., parks), and diversion of up to 160 million gallons per day (mgd) of urban runoff into Urban Runoff Plants throughout the City.

L-9-23: The LARRMP will be consistent with the prevailing Regional Transportation Plan (RTP) and its goals and policies; individual projects will be subject to CEQA analysis, including an analysis of their impacts regarding the RTP and applicable SCAG policies.

L-9-24: The LARRMP will be consistent with the prevailing Regional Transportation Plan (RTP) and its goals and policies; individual projects will be subject to CEQA analysis, including an analysis of their impacts regarding the RTP and applicable SCAG policies.
### Regional Transportation Plan Goals
- Protect the environment, improve air quality and promote energy efficiency.
- Encourage land use and growth patterns that complement our transportation investments.

### Regional Transportation Plan Policies
- Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.

<table>
<thead>
<tr>
<th>Performance Indicator</th>
<th>Performance Measures</th>
<th>Definition</th>
<th>Performance Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mobility</strong></td>
<td>Average Daily Speed</td>
<td>Speed-experienced by travelers regardless of mode.</td>
<td>10% Improvement</td>
</tr>
<tr>
<td></td>
<td>Average Daily Delay</td>
<td>Delay-excess travel time resulting from the difference between reference speed and actual speed. Total daily delay and daily delay per capita are indicators used.</td>
<td>40% Improvement</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td>Percent PM peak work trips within 45 minutes of home</td>
<td>Auto 90%, Transit 37%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Distribution of work trip travel times</td>
<td>Auto 8% Improvement, Transit 6% Improvement</td>
<td></td>
</tr>
<tr>
<td><strong>Reliability</strong></td>
<td>Percent variation in travel time</td>
<td>Day-to-day change in travel times experienced by travelers. Variability results from accidents, weather, road closures, system problems and other non-recurrent conditions.</td>
<td>10% Improvement</td>
</tr>
<tr>
<td><strong>Safety</strong></td>
<td>Accident Rates</td>
<td>Measured in accidents per million vehicle miles by mode.</td>
<td>0.3% Improvement</td>
</tr>
<tr>
<td><strong>Cost Effectiveness</strong></td>
<td>Benefit-to-Cost (B/C) Ratio</td>
<td>Ratio of benefits of RTP investments to the associated investments costs.</td>
<td>$3.08</td>
</tr>
<tr>
<td><strong>Productivity</strong></td>
<td>Percent capability utilized during peak conditions</td>
<td>Transportation infrastructure capacity and services provided.</td>
<td>20% Improvement at known benefits</td>
</tr>
<tr>
<td></td>
<td>Roadway Capacity - vehicles per hour per lane by type of facility.</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transit Capacity - seating capacity utilized by mode.</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td><strong>Sustainability</strong></td>
<td>Total cost per capita to sustain current system performance</td>
<td>Focus is on overall performance, including infrastructure condition. Preservation measure is a subset of sustainability.</td>
<td>$20 per capita, primarily in preservation costs</td>
</tr>
<tr>
<td><strong>Preservation</strong></td>
<td>Maintenance cost per capita to preserve system at basic year conditions</td>
<td>Focus is on infrastructure condition. Sub-set of sustainability.</td>
<td>Maintain current conditions</td>
</tr>
<tr>
<td><strong>Environmental</strong></td>
<td>Emissions generated by travel</td>
<td>Measured/forecast emissions include CO, NOX, PM10, SOX.</td>
<td>Meets controllability requirements</td>
</tr>
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DOC#133348

F-54
22 March 2007
Ms. Carol Armstrong
Page 12

Environmental Justice
- Expenditures by quintile and ethnicity
- Proportionate share of expenditures in the 2004 RTP by each quintile
- Proportionate share of benefits to each quintile ethnicity
- Proportionate share of additional airport noise by ethnic group

- Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments.
- RTP land use and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and sub-regions.

4.01 Transportation Investments shall be based on SCAG’s adopted Regional Performance Indicators:

SCAG’s Adopted Regional Performance Indicators:

Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient and economical movements of people and goods.
- Average Work Trip Time in Minutes – 22 minutes
- PM Peak Highway Speed – 33 mph
- Percent of PM Peak Travel in Delay (All Trips) – 33%

Accessibility - Transportation Systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.
- Work Opportunities within 25 Minutes – 88%

Environment - Transportation Systems should sustain development and preservation of the existing system and the environment. (All Trips)
- Meeting Federal and State Standards – Meet Air Plan Emission Budgets

Reliability - Reasonable and dependable levels of service by mode. (All Trips)
- Transit – 63%
- Highway – 76%

Safety - Transportation Systems should provide minimal, risk, accident, death and injury. (All Trips)
- Fatalities Per Million Passenger Miles – 0.008
- Injury Accidents – 0.929

Livable Communities - Transportation Systems should facilitate Livable Communities in which all residents have access to all opportunities with minimal travel time. (All Trips)
- Vehicle Trip Reduction – 1.5%
- Vehicle Miles Traveled Reduction – 10.0%
L-9-24: As the plan is consistent with the aforementioned IRP, which was approved by the City in 2006, it will be consistent with the latest SCAG projections and Growth Principles. Additionally, the City’s General Plan Framework and the Community Plans themselves are consistent with the Regional Growth Management Plan and the Regional Growth Principles.

GROWTH VISIONING

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principles” are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents
- Encourage transportation investments and land use decisions that are mutually supportive.
- Locate new housing near existing jobs and new jobs near existing housing.
- Encourage transit-oriented development.
- Promote a variety of travel choices.

Principle 2: Foster livability in all communities
- Promote infill development and redevelopments to revitalize existing communities.
- Promote developments, which provide a mix of uses.
- Promote “people scaled,” walkable communities.
- Support the preservation of stable, single-family neighborhoods.

Principle 3: Enable prosperity for all people
- Provide, in each community, a variety of housing types to meet the housing needs of all income levels.
- Support educational opportunities that promote balanced growth.
- Ensure environmental justice regardless of race, ethnicity or income class.
- Support local and state fiscal policies that encourage balanced growth.
- Encourage civic engagement.

Principle 4: Promote sustainability for future generations
- Preserve rural, agricultural, recreational and environmentally sensitive areas.
- Focus development in urban centers and existing cities.
22 March 2007
Ms. Carol Armstrong
Page 14

L-9-25

- Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
- Utilize "green" development techniques.

SCAG staff comments: It would be helpful if the Final EIR would provide a discussion and address the manner in which the program is supportive or detracts from the achievement of the Regional Growth Principles. Based on the information provided in the Draft PEIR/PEIS, we are unable to determine if the program is consistent with the Principles of the Compass Growth Vision. Please address this in the Final EIR.

CONCLUSIONS

L-9-26
1. As noted in the staff comments, the Draft PEIR/PEIS for LARRMP - SCAG No. 1 20070349 is consistent with or support many of the core and ancillary policies in the RCPG.

L-9-27
2. All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed program should be implemented and monitored, as required by CEQA.

L-9-26: Comment acknowledged.
L-9-27: Comment acknowledged.
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Anyone can post comments on this document. After the comment period, the next step is for the comments to be respond to. This is the place to list your comments and respond to other comments. Please use the text box below to post your comments or responses.

Comments

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a Joint Powers Agency established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's Metropolitan Planning Organization and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '3001 et seq., 23 C.F.R. '450, and 49 C.F.R. '513. SCAG is also the designated Regional Transportation Planning Agency, and is such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan, pursuant to California Health and Safety Code Section 44460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a Co-Lead Agency for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining Conformity of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7509.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans required by Section 65086 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21063 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans (California Environmental Quality Act Guidelines Sections 15065 and 15125(b)).

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the designated Area-wide Waste Treatment Management Planning Agency.

SCAG is responsible for preparation of the Regional Housing Needs Assessment, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the Southern California Hazardous Waste Management Plan pursuant to California Health and Safety Code Section 25130.3.

Revised July 2001

DOC#153348
March 27, 2007

Carol Armstrong
City of Los Angeles, Public Works Department
Bureau of Engineering
Environmental Management Division
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

RE: Southern California Regional Rail Authority (SCERRA) Comments on the EIR for the Los Angeles River Revitalization Master Plan (LARRMP)
[SCAG ID No. 120070049]

Dear Ms. Armstrong:

As background information, SCERRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink on member agency-owned and on private freight railroad rights of way. Additionally, SCERRA provides a range of rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA member agencies are the Los Angeles County Metropolitan Transportation Authority (METRO), Orange County Transportation Authority (OCTA), San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC). Although Metro owns the railroad right of way, Metro has assigned responsibility to the SCERRA for design, operation and maintenance of the railroad through the LARRMP area.

The reach of the Los Angeles River from just north of the Ventura Freeway (SR 134) near the Verdugo Wash south to Washington Blvd. is in close proximity to SCERRA’s railroad right of way, requiring SCERRA’s involvement in the review of all development proposals. Hundreds of millions of dollars in infrastructure investments have been made to the railroad corridor along the river since 1875. Many of the railroad investments made during the last 20 years have been as an alternative to highway travel and to improve the quality of life for Southern California residents. It is SCERRA’s statutory responsibility to provide commuter rail service and to maintain the railroad right of way for interstate freight and passenger commerce. This letter conveys recommendations from the SCERRA concerning issues that are germane to our agency’s statutory responsibilities in relation to the proposed project.

We provided lengthy comments on the project in general, following the issuance of the Notice of Preparation, in a letter to Dr. Ara Kasparian on May 4, 2006, a copy of which is provided for your reference. With the release of the Draft Plan, we now offer the following more specific
Comments

SCARRA Comments on LARRMP
March 2007

comments on the elements of the Plan that may affect Metrolink and other passenger and freight rail traffic in this area.

River Glen Opportunity Area

L-10-1: Comment acknowledged. This has been discussed with the LARRMP planning team. Specific design elements will be further explored during project-level analysis.

L-10-2: Comment acknowledged. This has been discussed with the LARRMP planning team. Specific design elements will be further explored during project-level analysis.

L-10-3: Comment acknowledged, we concur. This has been discussed with the LARRMP planning team. Please see response to L-10-4; specific design elements will be further explored during project-level analysis. See also response to Comment L-4-3.

L-10-4: Comment acknowledged, we concur. This has been discussed with the LARRMP planning team. Please see response to L-10-4; specific design elements will be further explored during project-level analysis. See also response to Comment L-4-3.

Taylor Yard Opportunity Area

L-10-5: Comment acknowledged, we concur. This has been discussed with the LARRMP planning team. Please see response to L-10-4; specific design elements will be further explored during project-level analysis. See also response to Comment L-4-3.
Comments

At present, SCRRRA maintains an alternative route from its Central Maintenance Facility adjacent to Taylor Yard to the active mainline railroad tracks. This alternate route is necessary in case of blockage of access to the mainline via the normal route. This emergency route follows the alignment of the River at the location proposed for a new pedestrian and bikeway bridge connecting Dorris Place and the east side of the River, noted as project 171. It will be necessary to carefully design the proposed Dorris Place bridge and adjacent access ways to avoid potential conflicts. Alternatively, SCRRRA may need to realign the current emergency access way to accommodate the larger project described below.

Of paramount significance is the proposal to convert the G2 parcel, currently the location of the closed Union Pacific locomotive shop, to a "regional water quality treatment facility, capturing runoff from very large box culverts that transport stormwater runoff that emerges from pipes in Glassell Park." This plan proposes to remove the current concrete channel walls, and apparently to construct the treatment facility up to the active railroad right of way. Prior to moving forward with this element, SCRRRA requests that significant hydrologic and geotechnical work be done by responsible agencies, including the U.S. Army Corps of Engineers, to design the facility in such a way as to mitigate the possibility of erosion of the active railroad right of way by runoff from this facility. SCRRRA and the owner of the right of way, the Los Angeles County Metropolitan Transportation Authority, must be assured that any such facility will provide protection from erosion. The railroad right of way cannot be the last line of defense in case of flooding. In addition, SCRRRA currently has an agreement with the Union Pacific Railroad (UPRR) to use a "tail track" on the current Taylor Yard property when the need arises for alternate access to and from the north end of the Metrolink Central Maintenance Facility. SCRRRA desires to retain the ability to access this track if and when there is any transfer of ownership of the G2 parcel.

Chinatown – Cornfields Area Opportunity Area

The primary alternative for the Chinatown – Cornfields Area proposes the creation of an island, upon which is the railroad alignment. The text of the plan indicates that the railroad is to be elevated on a trestle or other elevated structure. Two photographs on page 6-31 and 6-32 show the railroad at grade, including the creation of a new major pedestrian access way adjacent to Broadway (p. 6-32). SCRRRA would certainly prefer the railroad to be grade separated throughout this reach, thereby avoiding the need for an at-grade pedestrian crossing.

It is unclear in the Draft Plan how Main Street is to cross the proposed wetlands area and the elevated railroad. SCRRRA has long proposed the grade separation of Main Street and the two sets of tracks on each side of the River.

A new crossing near the Mission Road Rail Yards is proposed on page 6-33. It is unclear where this crossing is proposed, but we are concerned that an increase in the number of pedestrian crossings in this area will create a safety hazard. As mentioned above, new grade crossings should be grade separated, or consolidated with other crossings, in order to minimize the opportunities for interactions between trains and pedestrians.

Responses

L-10-6: Comment acknowledged. We concur on the importance of continued coordination. This has been discussed with the LARRMP planning team.

L-10-7: Comment acknowledged. We concur. This has been discussed with the LARRMP planning team. Appropriate coordination, engineering, and approval from the Corps of Engineers, Los Angeles County Department of Public Works, and other applicable regulatory agencies would take place during design and prior to construction, including the coordination on the tail track.

L-10-8: Comment acknowledged. We concur. The diagram shows the railroad maintained at the existing elevation, with an undercrossing for pedestrian access.

L-10-9: Comment acknowledged. This has been discussed with the LARRMP planning team. The design and determination of the impacts of this crossing would occur during project-level analysis.

L-10-10: Comment acknowledged. This has been discussed with the LARRMP planning team. We concur that, where possible, pedestrian access to the River should be grade-separated. Specific design elements will be further explored during project-level analysis.
L-10-11: Comment acknowledged. This has been discussed with the LARRMP planning team. We concur on the importance of continued coordination.

L-10-12: Comment acknowledged, we concur. These crossings are depicted as grade-separated.

L-10-13: Comment acknowledged.

L-10-14: Comment acknowledged.

Downtown Industrial Area Opportunity Area

The Draft Plan acknowledges the presence of significant railroad infrastructure in the Downtown Industrial Area. The Plan calls for some storage tracks to be moved out of Downtown, and for through tracks on the east bank to be “shifted inland from the River.” Both of these goals will require significant discussion with the owners of the facilities, including the LACMTA and the Union Pacific Railroad.

Three new parks are proposed to provide a connection to the River from the Boyle Heights neighborhood. It is not clear how these parks relate to the rail lines, but consistent with all of our comments, pedestrian access across the tracks should be grade separated. Page 6-40 seems to indicate that the crossings will be separated. We also acknowledge that pedestrian access from the west side is to be obtained by separated structures (p. 6-41).

The Draft Plan calls for the creation of a “pocket park” at the terminus of Commercial Street. While not necessarily a conflict, please note that SCRRA is about to construct a new train storage facility on the property just to the north of this location at Keller St. This facility will be used to store train sets, due to the limited space available at SCRRA’s Central Maintenance Facility at Taylor Yard. No maintenance activities will be performed at the Keller Yard. However, security fencing or other means will be required to keep pedestrians out of this facility.

Conclusion

In conclusion, we would like to acknowledge the progress that has been made to date as a result of discussions between SCRRA staff and members of the Project Team. We look forward to continued discussions with you as the Plan moves forward. If you have any questions regarding these comments please contact Laurene Lopez, Community Relations Administrator, at (213) 452-0288 or by e-mail at lopexl@screrra.net.

Sincerely,

David Solow
Chief Executive Officer

cc: Patricia Chen, Metro
Susan Chapman, Metro
Freddy Cheung, UPRR
Bill Bronte, Caltrans
Rosa Munoz, CPUC
John Hutchinsen, Amtrak
March 27, 2007

Dr. Carol Armstrong
City of Los Angeles
Department of Public Works
Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015


Dear Dr. Armstrong:

These comments are submitted by Anahuac Youth Sports Association, The City Project, Mujeres de la Tierra, and REMAPPING-LA.

The purpose of this letter is to provide public comments on the Los Angeles River Revitalization Master Plan Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/S). We incorporate by reference the accompanying public comments on the Draft Los Angeles River Revitalization Master Plan (draft Plan).

We support the revitalization of the Los Angeles River. We appreciate the efforts by the Los Angeles River Ad-Hoc Committee, its Chairman Councilman Ed Reyes, and many agencies and staff members for developing the DEIR/S.

Our purpose here is to help improve the DEIR/S by ensuring that the benefits and burdens of river revitalization are distributed fairly, and that the EIR/S process provides full and fair information and public participation in deciding the future of the river. Revitalizing the Los Angeles River while ensuring the fair treatment of people of all colors, cultures, and incomes can help transform Los Angeles into a more livable, democratic, and just community, and provide a replicable model for community redevelopment elsewhere.¹

The DEIS/DEIR was prepared to fulfill the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). NEPA has twin aims. “First, it places upon an agency the obligation to consider every significant aspect of the environmental impact of a proposed action. Second, it ensures that the agency will inform the public that it has indeed considered environmental concerns in its decisionmaking process.” Baltimore Gas & Electric Co. v. NRDC, 462 U.S. 87, 97 (1983); Robertson v. Methow Valley Citizens Council, 490 U.S. 332 349-50 (1989) (an EIS serves an “informational role” and provides a “spring board for public comment”). Similarly, the basic purpose of an EIR under CEQA “is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.” Citizens of Goleta Valley v. Board of Supervisors, 52 Cal.3d 553, 564 (1990).
Comments

Dr. Carol Armstrong
March 27, 2007
Page 2 of 7

The DEIR/S fails to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code Section 21000 et seq.; the CEQA Guidelines, California Code of Regulations, title 14, section 15000 et seq. ("CEQA Guidelines"); the National Environmental Policy Act ("NEPA") 42 U.S.C. 4321; 40 C.F.R. 1500.1; and the civil rights and environmental justice laws discussed below. The DEIR/S should be recirculated. The DEIR/S cannot properly form the basis of a final EIR/S.

1. Socioeconomics

The Los Angeles River stretches 52 miles through diverse communities from Canoga Park to the ocean. The demographics along the river are shown in Map 1001 and Chart 1001C, and in the following table.

<table>
<thead>
<tr>
<th>Demographics for a three mile radius of the Los Angeles River</th>
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<tr>
<td>3 Mile Radius</td>
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<tr>
<td>Total Population</td>
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<td>Children</td>
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<td>Non-Hispanic Whites</td>
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<td>Hispanic</td>
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<td>Asian</td>
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<td>Living in Poverty</td>
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<td>HS degree or less</td>
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<td>No Car Access</td>
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</table>

The socioeconomic data and analyses in the draft Plan and DEIR/S appears to be invalid for several reasons. First, the DEIR/S defines the river corridor too narrowly as a quarter mile, half mile, or one mile radius along the river (the Plan and DEIR/S are not clear which). Second, the draft Plan and DEIR/S rely on zip codes rather than census blocks or block groups, which more accurately measure demographic ground truth. There appears to be no good reason for relying on zip code data. Third, the zip code analysis for the Taylor Yard opportunity area is based on the wrong zip codes. See generally DEIR/S 3-128 to 3-171; 4-155 to 4-182. We recommend a 3 mile radius along the river using 2000 census block groups to more accurately assess the impact of revitalization.

2. Environmental Justice and Civil Rights

In addressing environmental justice—which is a central concern for revitalization in light of the demographics of people of color and low income communities along the river—the DEIR/S contains only a cursory reference to the Executive Order 12898 on Environmental Justice and Executive Order 13084 on Protection of Children from Environmental Health Risks and Safety. The DEIR/S fails to analyze other relevant federal and state civil rights and environmental justice laws.

Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources, including access to parks and other public lands. An important purpose of the statutory civil rights framework is to ensure

Responses

O-1-1: Comment acknowledged. Thank you for the documents included with your letter. They are now part of the public record and are available upon request from the City of Los Angeles. CEQA Guidelines, Section 15088.5 (a) through (g) sets the conditions under which an EIR may be circulated. None of these conditions are triggered. No specific rational is given for recirculation and in the opinion of the lead agency none exists.

O-1-2: Comment acknowledged. The study area of one half-mile on each side of the River and the expanded study areas encompassing each of the five Opportunity Areas were considered sufficient to evaluate at the programmatic concept level the potential impacts of future LARRMP implementation projects. The half-mile study area is also consistent with Los Angeles County’s Master Plan. Zip codes were chosen as a basis for developing some of the socioeconomic data for the PEIR/PEIS primarily for three reasons: (1) zip codes are based on a compilation of census block data; (2) they provided ready access to a broader array of census-based data than through basic census block information available at the time; and (3) they allowed a coverage area that extended beyond the half-mile boundary of the River Corridor study area. The coverage afforded by zip codes is considered sufficient for the programmatic analysis in this PEIR/PEIS of concept level planning within the River Corridor and Opportunity Areas. However, you are correct that the zip code coverage in the Draft PEIR/PEIS had a slight error, and this has been corrected in the Final PEIR/PEIS.

O-1-3: Comment acknowledged. Environmental justice has its origins with Title VI of the Civil Rights Act of 1964 which states "No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In 1994 Executive Order 12898 was issued and gave a renewed emphasis to Title VI and added low-income populations to those protected by the principles of environmental justice. With respect to how EO 12898 directs the evaluation of environmental justice, the following language from the EO is relevant:

F-64
Dr. Carol Armstrong  
March 27, 2007  
Page 3 of 7

F-65

Comments

O-1-3 (cont.): “To the greatest extent practicable and permitted by law ... each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.”

EO 12898 is intended to cover all aspects of potential human discrimination. Relevant language in the EO includes: “assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings...to attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; to preserve important historic, cultural, and natural aspects of our natural heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice; and to achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities.”

Environmental justice issues encompass a broad range of impacts covered by NEPA, including impacts on the natural or physical environment and interrelated social, cultural and economic effects. In preparing an EIS or an EA, agencies must consider both impacts on the natural or physical environment and related social, cultural, and economic impacts. Environmental justice concerns may arise from impacts on the natural and physical environment, such as human health or ecological impacts on minority populations, low-income populations, and Indian tribes, or from related social or economic impacts.

The analysis in this DEIR/DEIS is based on NEPA and CEQA guidelines. The NEPA guidelines rely on the Executive Order 12898 for the evaluation of environmental justice.
O-1-3 (cont.): On this basis, the programmatic analysis of environmental justice in this PEIR/PEIS is considered sufficient. Project-level analyses will look more closely at potential disproportionate effects on low-income or minority populations that are predominant in the locations of future LARRMP implementation projects. This will include considering several alternatives and making sure that environmental justice populations have access to public resources including parks and recreational areas.

The Citywide General Plan Framework, an Element of the City of Los Angeles General Plan was originally adopted by the City Council on December 11, 1996. It was subsequently re-adopted on August 8, 2001. “This Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole.” The Element’s strategies are based upon several principles which include: Economic Opportunity, Equity and Environmental Quality.

Chapter 9 of the City’s General Plan (which covers Infrastructure and Public Services explicitly) requires in Goal 9L (Recreation and Parks) that the City provide “sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities and passive recreation.” Further policies such as 9.23.2 require the City to “Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.” Text in Sections 4.15.1.1 and 4.15.2.1 has been modified.

O-1-4: Comment acknowledged. The LARRMP is a vision document focusing upon the River corridor within the City of Los Angeles and therefore cannot promise to definitively provide solutions to these region-wide public health and social justice issues.
<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
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<td>O-1-4 (cont.): The LARRMP’s ability to provide parks and open spaces that would be considered adequate to meet “unfair park, school, and health disparities” within the region is not reasonably predictable at this time. Such region-wide issues concern a number of jurisdictions and agencies and must be addressed in a comprehensive and concerted way with considerable public involvement. The Plan can certainly begin to provide opportunities in a variety of areas, but the viability of specific projects is dependent upon community planning and public involvement (Please see LARRMP Chapter 8.) processes that would take place subsequent to Plan adoption.</td>
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<tr>
<td>O-1-5: Comment acknowledged. We concur that developing additional parks would help meet the ever increasing demand for recreation. These benefits are implied in the Goals and Objectives of the LARRMP. However, it is also a likely result of increased visitation to the River Corridor that, until new recreational resources are implemented, existing facilities could become congested. A CEQA and NEPA environmental review typically focuses on potential adverse impacts and how they can be mitigated. This is a reasonable assumption to make at the programmatic level, but project-specific impacts may not yield similar impacts in each case.</td>
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<tr>
<td>O-1-6: This is a concept level, Programmatic EIR/S that is prepared per CEQA Guidelines Section 15168. As per 15168(b) (4), the Program EIR/(S) is for the purpose of allowing the City to consider “broad policy alternatives and program wide mitigation measures” early on. Section 15168(c) clearly recognizes that “Subsequent activities in the program must be examined in the light of the program EIR” to see if additional environmental documents must be prepared. The comment assumes housing displacement and gentrification as unmitigated impacts. The commitment of the lead agency is to design and plan future, subsequent projects in a way that these potential impacts are fully mitigated though additional environmental documents and decisions.</td>
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6. Transportation

The DEIR/S states that no federally funded transportation facilities will be constructed as part of future river revitalization projects, and that therefore no analysis of federal regulations is required (page 4-134). That proposition is incredible and must be wrong. Federal transportation funds have been used in the past for river revitalization projects including bikeways and bridges. Federal funds presumably will be available for transportation projects related to the river in the future. It is not clear why the DEIR/S turns its back on federal funding. The DEIR/S should be revised and should analyze applicable federal regulations and potential federal funding for transportation projects.

O-1-7: Comment acknowledged. We concur. Language will be added in Section 4.12.1.1 (Regulatory Framework), discussing federal regulations regarding federal funding.

O-1-8: Comment acknowledged. The reference to Section 4.12.10 has been changed to Section 4.12.8.

O-1-9: Comment acknowledged. Text will be revised in Section 4.12.6 of the Final PEIR/PEIS.

O-1-10: Comment acknowledged. We concur. Focus was intended to be increased maintenance needs. Text in Section 4.14.2.2 will be changed in Final PEIR/PEIS.

O-1-11: Comment acknowledged.

O-1-12: Comment acknowledged. The referenced bridges were not identified by the South Central Coastal Information Center as designated historic resources in the record search although there are historic bridges present, which have been evaluated. The bridges that have been recommended for inclusion and are pending formal designation as City of Los Angeles Cultural-Historic Monuments will be added to the table.

O-1-13: Comment acknowledged. We concur.

O-1-14: Comment acknowledged. The bridges that were drawn for the Historic American Engineering Record (HAER) and not
O-1-14: Comment acknowledged. Text will be added to referencing their historic status.

O-1-15: Comment acknowledged. Text will be added to the section acknowledging the likely status of this unevaluated resource. There are many uninventoried buildings and structures of historic age and resources that should be reevaluated when specific projects and “Areas of Potential Effects” are defined.

O-1-16: Comment acknowledged. The presence or absence of the referenced resources will be corrected. In particular, the San Fernando Road Bridge, Dorris Place School, North Spring Street Bridge, First, Fourth, Sixth, and Seventh Street Bridges will be added.

O-1-17: Comment acknowledged. Text will be added to acknowledge the age and possible historic status of unevaluated flood control infrastructure.

O-1-18: Comment acknowledged. We concur, that implementation of many of the LARRMP measures would have the potential to result in both positive benefits and adverse impacts on aspects of hydrology, flood capacity, and water quality. These positive benefits are implied in the Goals and Objectives of the LARRMP. A CEQA and NEPA environmental review typically focuses on potential adverse impacts and how they can be mitigated.

O-1-19: Comment acknowledged. We concur, that implementation of some of the LARRMP measures could also have the potential to result in a reduction in trash in some areas along the River Corridor. A CEQA and NEPA environmental review typically focuses on potential adverse impacts and how they can be mitigated.

O-1-20: Comment acknowledged.
Comments

Dr. Carol Armstrong
March 27, 2007
Page 6 of 7

We commend the DEIR/S for including trash in its Water Quality analysis. Trash is indeed an important environmental impact to consider, perhaps even among the most diffuse and difficult pollutants to keep out of our waters. The DEIR/S correctly states waterborne trash’s adverse effects on public health and aesthetics. Properly designed river projects will beneficially impact water quality by preventing trash problems. The DEIR sections on trash should be revised accordingly.

O-1-21

10. Water Safety

The DEIR/S states an increased risk of drowning as a potentially significant adverse impact (page 4-121), but fails to mention mitigation measures to address this impact. Water safety mitigation measures are well established on other rivers, and are described adequately on page 4-15 of the draft Plan, and in the subsequent summary of this section on page 4-236 of the DEIR/S. It is vitally important that these safety features be incorporated in all river projects to mitigate drowning dangers.

O-1-22

Additional mitigation (as specified in the draft Plan on page 4-7), especially in the long run, includes watershed management (including flood peak storage outside the channel) with channel naturalization will reduce flow velocities, making the river less dangerous.

O-1-23

11. A DEIR/S Project is not in the draft Plan

The Edenhurst Avenue project is discussed in the DEIR/S (see, e.g., page 2-25) but not in the draft Plan. The project should be either deleted from the DEIR/S or added to the DLARRMP.

O-1-24

12. Other Errors

Attachment 13 contains a list of errors in the DEIR/S that should be corrected.

O-1-25

CONCLUSION

O-1-26

For the reasons stated and under the authorities cited above and in the public comments on the draft Plan, the DEIR/S should be revised and recirculated.

Sincerely,

Robert Garcia
Executive Director
The City Project

Raul Macias
Founder and President
Anahuak Youth Sports Association

Fabian Wagmister
REMAPPING-LA

Responses

O-1-21: Comment acknowledged. We concur, that implementation of some of the LARRMP measures could also have the potential to result in a reduction in trash in some areas along the River Corridor. A CEQA and NEPA environmental review typically focuses on potential adverse impacts and how they can be mitigated.

O-1-22: Comment acknowledged. Examples of these types of warning measures are discussed in Section 4.11.2.2 (Potential Impact Levels). A better placement for this discussion might be the preceding Section 4.11.2.1 (General types of Impacts and Mitigation), under the discussion of Los Angeles River Water Safety.

O-1-23: Comment acknowledged.

O-1-24: Comment acknowledged. Reference to this project will be deleted in the Final PEIR/PEIS.

O-1-25: Comments acknowledged. Edits will be reviewed and incorporated as appropriate.

O-1-26: Comment acknowledged. Because this is a programmatic level analysis, because the document was available for public review for more than 50 days, because specific concerns may be adequately addressed in future project-level analyses, and because changes made in the Final PEIR/S provide clarification of key issues raised, the final document will not be recirculated according to the requirements for the draft. CEQA does not require additional review at the Final EIR stage. The 45-day public review period is a CEQA requirement for the draft document. We have already exceeded that requirement.
Dr. Carol Armstrong  
March 27, 2007
Page 7 of 7


2. Source: 2000 census data on races, block groups, GeoInfoware.

3. The DEIR/S audit 2000 zip codes for the Taylor Yards Opportunity Area, zip codes 90031 and 90065, and questionably includes zip code 90026.

4. See generally GARCIA AND WHITE, supra, HEALTHY PARKS, SCHOOLS, AND COMMUNITIES: MAPPING GREEN ACCESS AND EQUITY FOR THE LOS ANGELES REGION, at 8-12, 14-16.


O-2-1: The Community Plan update process, which will follow the adoption of this Plan, will enable assessment of impacts on housing, loss of affordable housing, jobs, and will examine issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suited to gauge community support. The overall policy of this Plan is to encourage the retention and strengthening of stable residential areas, and to balance these with a long-term program to acquire properties for flood protection and River improvement. All measures, including inclusionary zoning, equitable distribution of benefits, and rent and job stabilization strategies would be available to the community as they take part in developing their Community Plan revisions. The Plan does not advocate net removal of any affordable housing without proper compensation, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles. The City will also establish the Los Angeles River Special Project Office to facilitate Plan implementation. The 3-tiered governance structure recommended in the Plan would also provide opportunities to convene the kind of ongoing dialogue you are suggesting.
Comments

O-2-1: Staffed task force to pro-actively engage in a comprehensive examination of gentrification impacts of the Los Angeles River revitalization. This gentrification mitigation task force should include recognized, independent authorities with policy and community expertise from the fields of urban planning, low-income housing, economic development, and labor. Specific areas for task force action include research on effective gentrification mitigation measures and best management practices utilized elsewhere in the U.S. as well as recommendations regarding potential regulatory and policy options to complement anticipated planning and zoning efforts.

O-2-2: Resource Interface: Biological & Recreational. Audubon is pleased that the LARRMP holds the promise of significant improvements to both biological and recreational resources along the Los Angeles River corridor. We are equally concerned that there is, according to the DEIR/DIS, potential for adverse impacts on biological resources resulting from human-wildlife interactions. As a means to mitigate adverse impacts and equitably balance the needs for habitat and recreational improvements, Audubon recommends strategic and compatible placement of recreational amenities associated with the Los Angeles River revitalization. Areas with significant habitat potential should be left wild with public access restricted or, at most, paired with consistent passive recreation. Mixed-use and active recreation sites, including sportsfields, are compatible with areas having limited habitat restoration opportunities. In this way, active recreation sites would serve as important connectors between neighborhoods and the Los Angeles River corridor.

O-2-3: River Water Quality and Public Health. Audubon encourages public use of the land near the Los Angeles River. As such, we also recommend the development and implementation of related strategies and mechanisms to ensure the public’s health and safety, and the well-being of animals and plants that habitat the River corridor. The water quality treatments recommended in the LARRMP offer limited explanation of how these treatments will positively impact water quality of the Los Angeles River. Our most serious concerns are about human contact with contaminated water and associated health risks such as gastrointestinal or ear, nose, and throat infections. We recommend a fuller discussion about water quality and the public’s health in the DEIR/DIS and evidence-based mitigation measures to ensure water quality levels that allow for safe human contact consistent with existing stormwater or urban runoff reduction practice and greater water quality protection behavior.

O-2-4: General Habitat Considerations. We would like to preface our specific comments on habitat restoration with general recommendations in light of the massive environmental degradation resulting from the channelization of the Los Angeles River and the challenges of revitalization. First, it is imperative that no further net damage to habitat occur as revitalization projects are undertaken. Second, if genuine habitat restoration is possible in the designated opportunity areas, efforts should be concentrated on restoration of alluvial fan scrub and riparian woodland as these habitat types have been almost completely lost due to channelization and urbanization. Third, given that habitat restoration will be one of the most difficult environmental challenges of the revitalization of the Los Angeles River, both from a risk management and restoration standpoint, we recommend the creation of a habitat task force with oversight authority during the various construction and restoration projects and processes. We further recommend that this habitat task force be composed of recognized, independent experts in the field and that it be convened to oversee long-term, seasonal monitoring to complement construction efforts.

O-2-5: Keystone Species. Prior to channelization, the Los Angeles River supported a number of bird species that are now either extirpated entirely from the Los Angeles basin or are extremely rare in the few areas where suitable habitat remains. Two of these species are appropriately listed as "keystone" species in the LARRMP and DEIR/DIS: Loggerhead Shrike and California Quail. Both of these species no longer occur where they were once abundant and are solid choices of species that should be returned to the River pending successful revitalization.

O-2-6: Another "keystone" species listed in the report is the Acorn Woodpecker. Because this bird has adapted fairly well to urbanization and can be found utilizing non-native palm trees for foraging and granary areas, we recommend that it be removed from the LARRMP and EIR/DIS.

O-2-7: We also recommend a number of other species be included as "keystone" species in the final LARRMP and DEIR/DIS reports since they serve as exemplary indicators of successful natural habitat restoration and include: Lesser Nighthawks; Bell’s Vireo; Cactus Wren; California Grasshopper Sparrow; Swainson’s Thrush; Yellow

Responses

O-2-2: Comment acknowledged. We concur.

O-2-3: Comment acknowledged. In the Final PEIR/PEIS, language will be added to Section 4.5.8 (Mitigation Actions and Best Management Practices) regarding water quality, and to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor.

O-2-4: Comment acknowledged. We concur. These kinds of specific oversight activities are expected to take place following Plan adoption.

O-2-5: Comment acknowledged.

O-2-6: Comment acknowledged.

O-2-7: Comment acknowledged.
O-2-7: These recommended keystone species should be prioritized in the five Opportunity Areas where native habitat restoration is proposed. It is important to note that all of these species are known to nest simultaneously along the Los Angeles River at a time when a bird is flush period supports a mosaic of natural habitats and the river itself was a dynamic element providing the conditions required by its resident plants and animals. Opportunity Areas usually exceed the same area available for restoration would be ideal locations to reestablish the diversity of habitats present historically and with them the diverse array of native wildlife that was forced out of these areas.

O-2-8: Shorebird Staging. While the DEIR/DEIS acknowledges the significance of the Los Angeles River for migrating shorebirds, it does not examine the potential negative impacts that construction-related changes to the flow rate/volume could inflict upon them. Shorebirds utilize the completely artificial concrete channel in Long Beach, which lies outside of the study area described in the LARRMP and DEIR/DEIS. From July through October, a thin film of algae and microorganisms coat the concrete on the river bottom and provide essential nourishment for the thousands of south-bound migrating shorebirds that stop there every day. We recommend a study of the conditions that these migrant birds rely upon for survival. We further recommend the development and implementation of a plan explicitly specifying how the flow rate/volume and water quality will be maintained during construction (within the study area) allowing these conditions (outside the study area) to remain consistent with what is typical at that particular time of year.

Surveys and Monitoring. As noted in the LARRMP and DEIR/DEIS, the Los Angeles River is of vital importance for avian wildlife. The patches of riparian habitat peppering the river bottom through Sepulveda Basin and along Griffith Park to Taylor Yard host a number of breeding, migrating, and wintering aquatic and passerine birds. Sepulveda Basin also holds the river corridor in adjacent to the river making it not only important for birds, but also an important location for recreational bird watchers. Moreover, outside of the revitalization study area, the concrete channel of the Los Angeles River in Long Beach supports tens of thousands of migrant shorebirds every year, as mentioned above.

O-2-9: The Los Angeles River revitalization plans and construction projects must be adequately and accurately informed of the bird species that may be impacted negatively both within the revitalization area as well as downstream, outside the study area. We therefore recommend a comprehensive survey of the entire Los Angeles River (mentioned only without specifics in the DEIR/DEIS) to determine the current usage by wildlife including quantifying reproductive success of birds along the river’s habitats (e.g. clutch size and number of young successfully fledged).

Concomitant to the initial survey work, long-term monitoring must accompany the construction both in the revitalization areas and downstream. Surveys must be conducted periodically throughout the year (and multiple times during the peak breeding and migration window April – September) as the species utilizing the Los Angeles River migrate in and out of the area. Supplementary to ensuring the maintenance of the lower Los Angeles River shorebird staging area and the success of habitat restoration and mitigation in the revitalization zone, such a monitoring scheme adds essential scientific merit to the entire project.

Native Plants. The Audubon recommends that all plant material chosen for restoration and landscaping purposes associated with the LARRMP, including the River Improvement Overlay district, conform to the “Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.” Los Angeles native plants serve as essential habitat for local animal species, can provide thematic visual recognition of the River corridor, and conserve scarce water resources. Native landscaping associated with the LARRMP would greatly enhance the possibilities of habitat creation and mimic the natural communities that once occurred along the Los Angeles River.

O-2-10: Comment acknowledged. We concur.

O-2-11: Complementary Conservation Opportunity: The Arroyo Seco. The Arroyo Seco Tributary of the Los Angeles River is considered by many scientific and environmental authorities to be an important conservation opportunity in the Los Angeles area. The significance of the Arroyo Seco and its influence with the Los Angeles River is acknowledged in the LARRMP through its identification as a potential Opportunity Area for the project.

O-2-8: While agreeing with the comment, the LARRMP relied on technical memoranda prepared by the Los Angeles Department of Water and Power for the City’s Integrated Resources Plan project which was approved in 2006. These technical memoranda 2 and 4 are titled “Los Angeles River Flow Evaluation Phase 2, (Physical and Hydrodynamic Properties of the Los Angeles River Salt Marsh, impacts on Flora and Fauna, and Analysis of Potential Impacts of Reduced Freshwater Flow)”, and Low Flow Gauging at Existing Stations (Phase 2). The rest of the comment is acknowledged. Also, additional studies will be conducted as more site specific, River-related projects are proposed for implementation.

O-2-9: Comment acknowledged. The recommendations in your comment are best directed to future project-specific environmental evaluations that will be required under CEQA and NEPA if projects are proposed in the locations you describe within the River Corridor. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies are expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. The information provided in this PEIR/PEIS for these resources is sufficient for this programmatic concept-level evaluation of the LARRMP. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on biological resources in a particular project area.

O-2-10: Comment acknowledged. We concur.

O-2-11: Comment acknowledged. We concur.
The restoration of the Confluence and portions of Arroyo Seco in Los Angeles would add complementary value to the LARRMP and provide immediate and significant conservation outcomes. Conditions supporting such conservation efforts along the Arroyo include a large and supportive constituency, public ownership of the much of the land situated near the Confluence, and conservation projects already underway or in the planning stages in the area.

Conservation and restoration efforts along the Arroyo would provide a unique opportunity to connect several areas of prime wildlife habitat. Together, the Arroyo Seco and the Los Angeles River connect the three largest parks in the City of Los Angeles—Griffith, Elysian and Debs—all of which have significant natural habitat areas. The Arroyo Seco bisects the Repetto Hills in Northeast Los Angeles where remaining undeveloped hillside open space provides further habitat conservation opportunities. North of the City boundary, the Arroyo is lined with nearly continuous open space leading to the Angeles National Forest. This level of connectivity is rare in highly urbanized areas and the creation of a more natural park at the Confluence coupled with restoration of the priority sites on the Arroyo and preservation of local hillside would greatly enhance the possibilities for wildlife corridors along the Los Angeles River.

The Audubon is committed to partnering with the City of Los Angeles and other stakeholders on an independent effort to move forward an Arroyo revitalization process that would complement the work on the LARRMP. With such a possibility in mind, we would like to go on record recommending a minimum of new development along the Arroyo, water quality improvements, preservation of remaining hillside in Northeast Los Angeles for wildlife habitat and, consistent with that, strategic and compatible placement of recreational amenities.

In closing, Audubon applauds the City of Los Angeles for the visionary work leading to the creation of the Los Angeles River Revitalization Master Plan. We appreciate the opportunity to provide these comments to the LARRMP and the DEIR/DUE. Please feel free to contact me should you desire further background information on any of the comments herein. Thank you.

Sincerely,

Elva Yanez
Director
Audubon Center at Debs Park
4700 N. Griffin Ave.
Los Angeles, CA 90031
323-221-2255 ext. 11
eyanez@audubon.org
O-3-1: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

March 27, 2007

Ms. Armstrong:

The Chinatown Community Advisory Committee (CCAC), at its meeting of March 14, 2007, voted to support the L.A. River Revitalization Master Plan (LARRMP). The community is very interested in seeing the reclamation of the river, and the proposed adjacent opportunity nodes. In hopes of furthering this possibility, the CCAC requests that the Council District 1 and the City Planning Department develop a specific plan for the Chinatown Cornfields area. (See attached map page 6, 34 of LARRMP document).

Specifically, the CCAC approved a motion that stated “To balance development densities, which encourages higher density while generating resources for workforce, market rate and affordable housing, open space and streetscape improvements, pedestrian linkages, childcare and other community benefits. We recommend:

- T.F.A.R in the proposed specific plan
- New schools
- Medical service facilities
- Green transportation and public modes
- Encourage development while reducing parking and car requirements
- Encourage adaptive reuse of M zoned property to mixed-use or housing.

Best Regards,

Lillian Burkenheim on behalf of the Chinatown Community Advisory Committee, (CCAC)
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<th>Letter O-4</th>
<th>Comments</th>
<th>Responses</th>
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<tr>
<td>From: Dianne Domingo-Forate [<a href="mailto:dianne@fourpalm.org">dianne@fourpalm.org</a>]</td>
<td>Please send confirmation that this is in Public Record of the Questions/Testimony at the last River Meeting at Canoga Park High School. Please confirm integration of the LA County Riding and Hiking Trail with the Equestrian Trail Loops of the LA River Plan. Thank you, Dianne Domingo-Forate M.D. aka Dianne Lockhart Equestrian Trails Incorporated Board Member</td>
<td>O-4-1: This comment was discussed with the LARRMP planning team and has been confirmed.</td>
</tr>
</tbody>
</table>
Letter O-5

Comments

George Grace
3864 Clayton Avenue
Los Angeles, CA 90027
323-660-2483
gmrnet1.gmrnet.com

Carol S. Armstrong, Project Manager
Los Angeles River Revitalization Master Plan
Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

Dear Ms. Armstrong,

Per my email, I have enclosed the Federal Highway Administration, Department of Transportation booklets “Critter Crossings - Linking Habitats and Reducing Roadkill”, and “Keeping It Simple - Easy Ways to Help Wildlife Along Roads”.

These are excellent, and illustrate what can be done to help wildlife "get to the other side of the road".

I hope you enjoy reading them.

Sincerely,

George Grace, Griffith Park Master Plan Working Group member

Responses

O-5-1: Comment acknowledged. Thank you.
Letter O-6  Comments  Responses

HOMEOWNERS OF ENCINO
JERALD A. SILVER, PRESIDENT
P. O. BOX 260205
ENCINO, CA 91426-0205
818-990-2757

LOS ANGELES DEPT. OF PUBLIC WORKS

LOS ANGELES RIVER REVITALIZATION MASTER PLAN

RESPONSE TO

DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT/STATEMENT

State Clearinghouse No. 2006041050

JANUARY 29, 2007

(CEQA, SEC. 21000 et. seq. and GUIDELINES SEC. 15087)

RESPONSE to the Draft Programmatic Environmental Impact Report/Statement
[PEIR/PEIS] for a project known as:

LOS ANGELES RIVER REVITALIZATION MASTER PLAN

The project will be located at:

The Los Angeles River flows approximately 52 miles from its origin in the San
Fernando Valley region of the City of Los Angeles to Long Beach Harbor and the
Pacific Ocean via Queensway Bay. The River runs east/southeastward through Los
Angeles and along the cities of Burbank and Glendale in its northern reaches and
then heads southward, flowing through the cities of Vernon, Commerce, Maywood,
Bell, Bell Gardens, South Gate, Lynwood, Compton, Paramount, Carson, and Long
Beach, respectively. The first 32 miles of the River, which comprise the LARRL/IP
project area, flow through the City of Los Angeles, intersecting 10 Council Districts
(Districts 3, 12, 6, 2, 5, 4, 13, 1, 9 and 14, respectively), approximately 20
Neighborhood Council areas, and 12 Community Plan areas as follows (in geographic
order from north/northwest to south/southeast): 1) Canoga Park-Winnetka-Woodland
Hills-West Hills; (2) Reseda-West Van Nuys; (3) Encino-Tarzana; (4) Van Nuys-North
Sherman Oaks; (5) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass; (6) North
Hollywood Valley Village; (7) Hollywood; (8) Northeast Los Angeles; (9) Silver Lake-
Echo Park; (10) Central City North; (11) Central City; and (12) Boyle Heights

The project applicant is:

LOS ANGELES DEPT. OF PUBLIC WORKS

F-81
Comments

1. HOMEOWNERS OF ENCINO, INC.

This Response is filed by the Homeowners of Encino, a Californian non-profit corporation duly organized and existing under the laws of the State of California. Homeowners of Encino is a public benefit association organized for the purpose of promoting social welfare. This corporation seeks to protect the residential character of its neighborhoods and to enhance the quality of life for its members and the community. Many of its members reside within the neighborhood of the proposed project, and will be heavily impacted by it.

II. DESCRIPTION OF PROJECT

The Los Angeles River Revitalization Master Plan (LARRMP) is intended to serve as a blueprint for implementing a variety of greening projects, including the development of parks and open space, pedestrian and bicycle trails, bridges, enhanced connector streets, channel modifications, ecological restoration, revitalized riverfront communities in key opportunity areas and recommendations for a River Improvement Overlay (RIO) district along the 32-mile stretch of the River within the City of Los Angeles.

Implementing LARRMP recommendations over the near-term planning period (5 to 20 years) and the long-term period (20 to 50 years) constitutes the proposed action evaluated in the draft PEIR/PEIS. The general project area includes approximately one-half mile on each side of the 32-mile River corridor that begins near Owensmouth Avenue in Canoga Park (at the confluence of Bell Creek and Arroyo Calabasas) and continues downstream to Washington Boulevard, near the northern boundary of the City of Vernon. The LARRMP provides recommendations in four broad categories: physical modifications to the River channel, open space development, multi-purpose revitalization in twenty opportunity areas with five described in greater detail and River corridor governance and management.

The Plan intends to revitalize the general environment of the Los Angeles River by providing improved natural habitat, economic values, and water quality, as well as recreation, and open space amenities. The Plan area includes several locations where the potential exists for restoring a more natural riverine environment along the River, while maintaining and improving levels of flood protection. Creation of treatment wetlands in and around the River, to treat storm flows and to restore missing linkages of fragmented habitat, would also be pursued through LARRMP projects. Restored areas would provide natural riparian habitat to support indigenous wildlife and avifauna along a corridor transecting most of the San Fernando Valley, and extending into downtown Los Angeles. Other LARRMP purposes include the provision of improved public access to the River and reinvestment in the urban system that results in economic growth. The City's LARRMP proposes continued collaboration with both Los Angeles County and the Corps on Plan implementation issues, such as access, maintenance, and public safety, through establishment of a participatory River Authority.

The proposed project affects transportation, earth, air, water, plant life, population, energy, utilities, land use, and other environmental elements in Encino.
Comments

surrounding area] This document contains our response to the scope and content of the draft environmental information which is germane to your environmental evaluation of this project.

III. IMPACTS THAT HAVE NOT BEEN FULLY ASSESSED

O-6-1

We believe that the proposed project will have significant impacts on the environment that have not been fully addressed in the draft PEIR/PEIS. It will have a significant impact on air quality, water, natural resources, population, noise, geology, energy, and population growth.

The Lead Agency must take into consideration the effects of this and other projects which will have individually limited, but cumulatively considerable impact on the environment. With the effects of past, current and probably future projects mandatory findings of significance should be found. [Guidelines Sec. 15065] Throughout your draft PEIR/PEIS you have relied upon “mitigations” that are required by law or official regulations and these are unacceptable. Such measures cannot serve as mitigations to satisfy the requirements of the California Environmental Quality Act (CEQA). Nor can mitigations be acceptable that are considered to be standard operating practices by developers who could be found negligent, if such operating procedures were not met.

In preparing your final PEIR/PEIS, you must recognize that any mitigations that you propose must go beyond those mandated by law or existing policy and practice. Compliance with the law and standard operating procedures establishes the baseline. CEQA mitigations are discretionary actions taken beyond the baseline. You must include verifiable mitigations in the final PEIR/PEIS, not merely a recital of legal requirements or standard operating practices. We ask that you revise your findings and address the following environmental concerns which we believe have been overlooked or inadequately dealt with in your draft PEIR/PEIS:

IV. IMPACTS ON EARTH

This project will result in disruptions, displacements, compaction and overcovering of soil. The final PEIR/PEIS should specify what grading will be done, and provide a timeline indicating the starting and ending dates of all grading and construction activities. SHaVE routes should be described, and mitigation proposed for dealing with the traffic congestion created by the hauling of large amounts of soil on city streets to dumpsters. The information presented in the final PEIR/PEIS should be sufficient to allow for a clear understanding of the geologic hazards and their impacts.

The final PEIR/PEIS should present a comprehensive summary of known geologic and seismic hazards near the site. These should be clearly identified to ensure that the proposed buildings plans willfully evaluate and mitigate the problems.

The final PEIR/PEIS should include maps that show areas of unsuitable fill soils, potentially unstable slopes, areas of differential settlement, areas of expansive soils, and the potential zone of inundation from flooding, due to a 100 year flood. The final PEIR/PEIS should present a summary of seismic information on ground acceleration and the duration of strong shaking that could be expected from large earthquakes on

Responses

O-6-1: Comment acknowledged. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies can be expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. On this basis, the PEIR/PEIS has discussed the likely potential impacts on 16 resource areas that would likely be associated with future specific projects that may be proposed to implementation the LARRMP concepts for channel modifications and open space developments within the River Corridor and the five opportunity areas. The evaluations in this PEIR/PEIS have concluded that significant impacts are possible for aspects of 10 of the 16 resource areas addressed. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on particular resource areas.

O-6-2: Comment acknowledged. Please also see previous response. Discussions of cumulative impacts presented in the PEIR/PEIS are adequate for this evaluation of the concept-level of planning in the LARRMP. More in-depth evaluations of cumulative impacts can be anticipated at the project-level CEQA and NEPA environmental analyses that will accompany future implementation of specific projects. It can also be expected that project-specific mitigation measures will be identified that may be considered going beyond those identified in this concept-level programmatic PEIR/PEIS.

O-6-3: Comment acknowledged. The excellent recommendations in your comment are best directed to future project-specific environmental evaluations that will be required under CEQA and NEPA as projects are proposed in particular locations within the River Corridor.

The information provided in this PEIR/PEIS for these resources is sufficient for this programmatic concept-level evaluation of the LARRMP.
The LARRMP will be in compliance with regional policies and agreements, standards and guidelines set by the Air Quality Management Plan and by SCAG projections, and commitments made in the Integrated Resources Plan, which the LARRMP and this PEIR/PEIS have incorporated by reference.
The information provided in this PEIR/PEIS for these resources is sufficient for this programmatic concept-level evaluation of the LARRMP. It has been concluded that potential impacts to biological resources at the project level can be reduced to less than significant levels with mitigation identified in this document and supplemented by future mitigation that may be required for individual projects.

The LARRMP will be in compliance with local and regional noise policies, standards and guidelines.

O-6-8: Comment acknowledged. Please refer to previous response to Comment O-6-3.

Light and glare were not adequately assessed in the draft PEIR/PEIS. Residents living near the construction sites will be subjected to light and glare. The applicant must be required to illuminate the premises without casting light and glare on nearby buildings. Any buildings located adjacent to the entertainment venues will be directly impacted. The light and glare that will spill onto nearby buildings must be mitigated in the final PEIR/PEIS. The construction project will result in altered shade and shadow conditions which should also be mitigated to insignificance in the final PEIR/PEIS.
O-6-9: Comment acknowledged. The LARRMMP will be in compliance with regional policies and consistent with SCAG population projections. Population increases projected in future LARRMP projects will be kept within SCAG projections, and will be determined through community interactive planning processes. See responses to Comments L-9-1 to L-9-27. See also response to Comment O-6-3.

O-6-10: The project area has already registered raises in land prices and has put a strain on the affordable housing and small business sectors. The LARRMP recognizes the need to update existing Community Plans in river-adjacent areas through an extensive and inclusive community involvement process to ensure that LARRMP benefits are as equitably distributed as possible. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suitable to gauge community support. The overall policy of the Plan is to encourage the retention and strengthening of stable residential areas, and to balance this with a long-term program to acquire properties for flood protection and river improvement.

O-6-11: The LARRMP acknowledges and reflects the importance of public transportation and mass transit as a means of making the River-related parks and recreational areas more accessible to the general public. In addition, non-motorized transportation, such use of bike trails and paths, are a key element of the transportation component of this plan.
Comments

O-6-11: The final PEIR/PEIS should deal with the phasing issue comprehensively. What will be the incremental impacts on traffic, and if phased, how will the infrastructure be phased so that all mitigations are in place to prevent increases in traffic or a degradation of circulation.

O-6-12: Your final PEIR/PEIS should conform to the guidelines in the Fire Protection and Fire Prevention Plans, as well as the Safety Plan, which are elements of the Los Angeles General Plan C.P.C. 19708. The final PEIR/PEIS should also analyze police services and crime rates in the area, and the impact of this project on these rates. Include average response times, and show the number of officers deployed in the area, and the impact on current levels of staffing. Show how parking areas will be controlled, use of closed circuit television, and how elevators and parking areas will be illuminated to prevent an increase in crime which could result from this project. In particular include data on burglary from autos, auto theft and assaults.

O-6-13: What will be the impact on the sewage system. Show the volume of sewage produced by the project, and how it will impact the Hyperion, Los Angeles-Clendale and Tillman plants. Show which sewage lines will need to be upsized, which streets will be affected, and for how long a period. The final PEIR/PEIS should analyze the availability of hydraulic capacity for the anticipated flow in the local and interceptor sewers serving the proposed project area. The quantity and quality of wastewater to be discharged to the sewer system should be more thoroughly analyzed.

The City of Los Angeles has enacted ordinances which are designed to reduce the volume of water introduced into the sewage system. These measures must be considered baseline, and do not qualify as mitigation measures, since they are

Responses

O-6-12: Comment acknowledged. Please refer to previous response to Comment O-6-3. As future LARRMP projects move toward implementation in particular locations, specific project-level impacts on public services will be evaluated. The LARRMP-recommended Joint Powers Authority is expected to result in streamlined, more efficient public service provision within the river corridor and to provide advice and appropriate recommendations for specific areas and issues.

O-6-13: Comment acknowledged. Please refer to previous response to Comment O-6-3. The LARRMP is fully in compliance with the Integrated Resources Plan, which the LARRMP and this PEIR/PEIS have incorporated by reference.
O-6-14: Comment acknowledged. All future LARRMP projects will preserve or enhance the existing hydrology and hydraulics of the River required for adequate flood management. Both the County and Corps of Engineers will be involved in reviewing any design proposals involving channel modifications. Please also refer to the response to Comment O-6-3.

O-6-15: Comment acknowledged. The LARRMP, although it discusses a phased-approach to River revitalization (e.g., through “top down” greening in stages over time), it is not intended to be implemented in discrete phases because it is a vision document only. Next steps toward LARRMP implementation will involve individual projects and community-based proposals under the guidance of, and in compliance with, regional policies and consistent with SCAG population projections. Population increases projected in future LARRMP projects will be kept within SCAG projections. Proposed channel modifications—such concrete removal—cannot take place before the U.S. Army Corps of Engineers’ Los Angeles River Ecosystem Restoration Feasibility Study is completed.

O-6-16: This PEIR/PEIS is a vision document which includes concept level discussion of issues, policies, options, and alternatives. CEQA Guidelines section 15168, which governs use and content of program EIRs, states that a program EIR is used in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. One can present this PEIR/PEIS as a “first-tier” EIR that has enough analysis to give the reader “the big picture.” The formulation of details regarding site-specific issues can be deferred until preparation of later project EIRs or negative declarations. Consequently, the document focuses on broad policy alternatives, program-wide mitigation measures, regional influences, and cumulative impacts applying to the program as a whole, per CEQA Guidelines Section 15168(b)(4), (d)(2). The intent is to adopt performance standards or objectives (e.g., no net loss of flood control capacity) that can be trans-
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<th>Responses</th>
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<td>O-6-16 (cont.): into site-specific mitigation measures when future site-specific CEQA analysis is prepared.</td>
<td>Section 2.6.1 of the PEIR/PEIS starts the analysis of various alternative options, while Section 2.6.2 discusses the No Project alternative. The No-Project alternative will not be able to meet the goals and objectives of the LARRMP as expressed by the City Council’s Ad Hoc Committee on the Los Angeles River. Since the project alternatives discussed in Section 2.6.1 meet the project’s goals and objectives, it is too early to evaluate the environmentally-superior alternative at this first-tier level. This evaluation will have to be done in subsequent environmental documents.</td>
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<tr>
<td>The Findings and Statement of Overriding Considerations is prepared for consideration by the City Council.</td>
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O-6-17: Comment acknowledged. The environmental document for the project is programmatic in nature. Specifics concerning land use characteristics will be addressed in project-level environmental analyses as well as the community planning efforts (Community Plan updates, initiation of specific plans, and the RIO), which will take place subsequent to Master Plan adoption. See Chapters 8 and 10 of the LARRMP for more information.

O-6-18: Comment acknowledged.

Comments

Affirmatively mandate that public agencies take concrete actions to protect the environment whenever it is feasible to do so. This substantive duty is enforced through the findings requirements of Sec. 21081 and Guidelines Sec. 15091. These sections require a public agency to make detailed findings regarding the feasibility of all environmentally superior alternatives or additional mitigation measures available prior to approving any project which may cause significant impacts on the environment. See Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1034-1035, 185 Cal.Rptr. 41.

O-6-16

Where the project, as approved, will result in significant environmental impacts, the agency must make the finding, pursuant to Sec. 21081(c) [Guidelines Sec. 15091(a)(3)] that each environmentally superior alternative to the project proposed in the PEIR/PEIS but rejected by the agency is "infeasible" for specific economic, social, technical or other reasons. Village Laguna, 134 Cal.App.3d 1022, 1034. The findings must also expressly identify the "specific economic, social or other considerations" relied upon by the agency in determining that the alternative is infeasible. Id. at 1034-1036.

XVIII.

ALCOHOLIC BEVERAGE LICENSE REQUIREMENTS

The need for Conditional Use Permits (CUPs) related to the operation of the restaurants, and other entertainment venues must be addressed in the final PEIR/PEIS. In Friends of Mammoth v. Board of Supervisors of Mono County (1972) 8 Cal.3d 247, 262, the Supreme Court held the term "project" included not only government-initiated actions, but also "permits, leases, and other entitlements." This was codified under CEQA in Section 21065. The final PEIR/PEIS should explore the permits, liquor licenses and other entitlements related to restaurant operations. Since 1939 the number of retail liquor licenses has been limited. At present, the ratio is one on-sale general license for each 2,000 persons in the county, and one off-sale general license for each 2,500 persons. (See Business and Professions Code, Sec. 23000, et. Seq.) The final PEIR/PEIS should analyze this issue and report on the number of Conditional Use Permits in the area, and whether ABC limits have been reached or exceeded. Failure to address this matter in the final PEIR/PEIS may mean that a CUP may not be granted later.

XIX.

NO STATEMENT OF OVERRIDING CONSIDERATION SHOULD BE ISSUED BY THE LEAD AGENCY

O-6-17

We ask that the lead agency prepare a final PEIR/PEIS that interprets CEQA to afford the fullest possible protection for the environment within the reasonable scope of the statutory language. (Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d. 247) We request the lead agency require additional changes and alterations in the project to avoid and substantially lessen the significant impacts that have been reported in the DPEIR/PEIS, satisfying the requirements of CEQA Section 21001.
O-6-19: Comment acknowledged. Future projects resulting from the LARRMP, should it be adopted, would comply with CEQA and all prevailing, applicable environmental regulations.
March 27, 2007

Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1140 S. Broadway, Suite 600
Los Angeles, CA 90015

RE: Response letter – Los Angeles River Revitalization Master Plan

Dear Ms. Armstrong:

We are pleased to comment on the Los Angeles River Revitalization Master Plan (LARRMP) and EIR/EIS. The Los Angeles & San Gabriel Rivers Watershed Council is a 501(c)(3) non-profit organization whose mission is to facilitate an inclusive consensus process with our stakeholders to preserve, restore, and enhance the economic, social, and ecological health of the Los Angeles and San Gabriel Rivers Watershed through education, research, and planning. The project is summarized in the LARRMP with its impacts described in the EIR/EIS.

The Watershed Council applauds the concept for revitalization as well as the public process the Plan has undergone. We are excited that the City is discussing concepts such as greening with native plants, reconnecting the public to the River, education, bikeways, and stormwater infiltration are laudable.

The attached comments have neither been reviewed nor adopted by the Board of Directors of the Watershed Council, but are based on staff’s review of the Plan. The Watershed Council officially requests a copy of future environmental documents that will be prepared under this plan and EIR/EIS pursuant to the California Environmental Quality Act and the National Environmental Policy Act. Please direct any questions and documents to Nancy L.C. Steele, Executive Director, at (213) 229-9950.

Sincerely,

Nancy L.C. Steele, D.Env.
Executive Director

Disclaimer:
The Watershed Council, in expressing support for projects and proposals consistent with its mission and vision, does not evaluate or rank competing proposals relative to one another. The Council’s determination that a proposal is consistent with our mission and vision and worthy of support does not imply that individual agencies and organizations represented by the Council also support, or have reviewed, the proposal.

The Los Angeles & San Gabriel Rivers Watershed Council
700 N. Alameda Street, Los Angeles, CA 90012   T 213/ 229-9945   F 213/ 229-9952

F-92
GENERAL COMMENTS:

We applaud the inclusion of the *Landscaping Guidelines and Plant Palettes* in the Plan, and highly recommend that the City of Los Angeles formally adopt the Guidelines developed for the Los Angeles River, as has the County of Los Angeles. Aside from their habitat value, the Plant Palettes were specifically chosen to reflect the sense of place here in Los Angeles as well as those that can survive within the rainfall typical for Los Angeles. With the concerns regarding future water supply, we feel these plant selections have the best chance to not only survive but also thrive within these public landscapes. Two central aspects of the Guidelines are the partnership between restoration ecologists and landscape architects and the use of indigenous plants material for revegetation projects.

Ecological Restoration:

We are concerned with the use of *ecological restoration* as a term and a goal. Discussing ecological restoration within a 25-year time frame is overreaching conceptually as true restoration may take the better part of a century to achieve even most of the functions of a riparian system. The goal may more accurately be stated "restoring partial ecological functioning to a highly damaged river in order to phase to full ecological restoration."

We do not feel it is appropriate to simply redefine ecological restoration to fit the current planning process. Redefining an ecological concept confuses a public that is not scientifically savvy and is educationally unso. The *Landscaping Guidelines and Plant Palettes* do not mention ecological restoration at all because they are not aiming to restore all the functions of a riparian system. Instead the Guidelines uses "revegetation" and specifically refers to the use of locally native plants (within the LA River watershed) that produce beautiful, functional public spaces that produce genuine opportunities for wildlife as well as using substantially less (or no) water following plant establishment. Turf grass with trimmed up trees on concrete terraces within a concrete channel may provide some habitat value for opportunistic wildlife species but does not constitute habitat for wildlife across all biological resources (insects to bats, lizards to amphibians, mammals and fish). In order to gain a visual image of riparian systems, a visit to an intact system in the Los Angeles River, such as Brown and Mormon Canyons, is well worth the trip. If the Ad Hoc River Committee is interested, we would be willing to schedule a time to visit the area with them.

This Plan is proposing something different from restoration, and the appropriate term is revitalization. Revitalization conveys the energy and vitality the City wishes to reintroduce into a damaged river channel system, to reintroduce the people of Los Angeles to an undervalued component of this City. Re-envisioning the River and creating support and political will for changes to it is an important step to eventual ecological restoration, which would require, in all likelihood, concrete removal.

Functional Capacity:

Instead, the City might consider focusing its Section 404 discussion on functional capacity. "Functional capacity is defined as the degree to which an area of wetland performs a specific function . . . (and) refers to the ability of a wetland area to perform a single function and not the
capacity of a wetland to perform across multiple functions. It is possible to focus analysis on functions such as flood storage capacity, groundwater infiltration, and perhaps even energy dissipation and cleansing surface water (through artificial wetlands). Suggesting full restoration would include discussions on nutrient cycling, sediment transport, maintenance of riparian communities (including plant species composition and structure) and endangered species habitat that the City cannot argue in the Opportunity Areas. All discussions for these areas focus on habitat for human recreation. In Section 404 review, the objective for assessing wetland functions is to determine the impact of a proposed project on wetland functions. In the larger context, this supports the objective of the Clean Water Act (33 U.S.C. 1344) which is “...to restore and maintain the chemical, physical, and biological integrity of the waters of the United States.”

Surveys for Biological Resources:
The City should conduct biological surveys since no one has ever systematically surveyed within the Right of Way (ROW). We assume that the ROW has little habitat value but it would be incorrect to assume no wildlife is using the flat protected pathway currently. The ROW has been vacant for so long no one really knows what animals are using it, especially at night. Anecdotal stories of wildlife using the ROW include mammals, such as coyotes (important scavengers), bobcats, as well as ringtails, woodrats, and rabbits. We assume that other animals, such as insects and reptiles also use the ROW but there is little published information. Changes of the ROW could disrupt movement corridor routes currently used by a number of species, threatening genetic flow between populations currently otherwise separated by development but tenuously connected by the Rivers ROWs.

As plans move forward to ‘enhance’ these areas for biological resources, some resources should not be overlooked even though they are less charismatic than hummingbirds. Bats, for example, are an underrated resource that they control mosquitoes and other flying insects at night.

We recommend that the City, therefore, conduct surveys should be conducted across several seasons including spring, during different times, including dawn, dusk, and at night, and by biologists who specialize in specific animal groups. In other words, scientific rigor demands that search images should not be mixed across taxa. It is not advisable to mix bird search images, for example, with reptiles or plants.

We suggest that the environmental education kiosks emphasize to the public that humans as well as other species are sharing the ROW. We are concerned that there is an emphasis on creating wildlife habitat but the public may tend wildlife as a nuisance when non-charismatic species are encountered within a limited area.

Socioeconomic Issues:
We have two concern areas:
1. Gentrification
2. Eminent domain

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O-7-4 (cont.): standards in terms of community stability and makeup. This is a stakeholder driven process that is best suited to gauge community support. The overall policy of this Plan is to encourage the retention and strengthening of stable residential areas, and to balance these with a long-term program to acquire properties for flood protection and River improvements. All measures, including inclusionary zoning, equitable distribution of benefits, and rent and job stabilization strategies, would be available to the community as they take part in developing their Community Plan revisions. The Plan does not suggest the net removal of any affordable housing, but recognizes that should a decision be made to do this in the future, it should include proper compensation, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles Housing Authority.

No eminent domain will be used without triggering the California Environmental Quality Act in subsequent phases of this project. This means that the public will have full knowledge and opportunity to comment on any future project component that involves eminent domain. Both the RIO district creation and the Community Plan revisions will ensure future stakeholder input per City of Los Angeles procedures and policies.
Recommendation 4.3 same comment and we agree – in-channel stormwater treatment does not qualify for compliance with TMDL requirements. We are concerned about private developers using the channel (a public resource) for stormwater treatment to meet SUSMPs rather than starting at source control and then neighborhood-level solutions.

p. 4-15 Recommendation 4.9 The rubber dams used in the San Gabriel River and in the Santa Ana River are not used as recreational facilities but are solely linked to surface water detention for groundwater infiltration. Important questions include: How long would these rubber dams be in place at any one time? How much energy will it take to treat the water if it is held for any length of time at all? Will body contact be allowed? If not, is the City willing to police the ponded area to prevent intrusion? Who will pay for the policing? Will pesticides be used to treat for West Nile Virus? How will the public be notified? Since at least some of the waterway is impaired won’t impaired water be flowing into the ponded areas? Who will pay for the energy? How will this interfere with recovery of anadromous fish?

p. 4-17 Recommendation 4.11. Invasive species are an increasing problem in Los Angeles. We strongly recommend that no invasive species be used for “greening retaining and sound walls,” or anywhere in any plantings. Already at the Compton Creek confluence, for example, cat’s claw vine (MacFadyena unguis-cati) is problematic as it is uncontrolled, flows over the levy and down the trapezoidal channel wall. Seeds from this vine spread easily downstream where they’ll lodge then need to be removed with pesticides, which is counterproductive from a water quality perspective. We recommend that all proposed plant lists comply with the Landscaping Guidelines. In addition to the Landscaping Guidelines, the Watershed Council has information on its web site, www.theprofile.com, that can assist landscape designers and restoration ecologists with an appropriate list of vines and other plants.

p. 4-20 Recommendation 4.13. “Create a continuous functional riparian corridor that provides habitat for birds, mammals, and fish within the channel bottom.” This recommendation should be broadened to include invertebrates, amphibians, bats, and reptiles. Insects in particular are often the bottom of the food chain for fish and birds (that are not plant eaters) and their absence would prevent establishment of charismatic animals.

p. R-5 Please note that the citation for the Guidelines should read:

O-8-1: The LARRMP proposes adherence to the County’s Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes (January 2004), which requires the use of native, drought-tolerant plants that provide habitat for indigenous wildlife and avifauna. (See Section 4.7.8 of the Final PEIR/PEIS.) Additional direction regarding appropriate landscaping would also be provided in the River Improvement Overlay district guidelines, which would be implemented following Plan adoption. The adherence to the County’s Landscaping Guidelines and Plant Palettes has been added to Section 4.7.8 of the Final PEIR/PEIS.
O-8-2: Comment acknowledged. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies can be expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on particular resource areas. The excellent recommendations in your comment are best directed to future project-specific environmental evaluations that will be required under CEQA and NEPA as implementation projects are proposed in particular locations within the River Corridor. Also, your input should be shared during development of the RIO district guidelines, subsequent to Plan adoption.

All LARRMP-related specific projects will be implemented with subsequent environmental review that would analyze impacts downstream. Specific measures will be taken at that time to prevent, minimize or avoid adverse downstream impacts.
Creek, Little Tujunga Creek, etc.) and downstream of the river.

For instance, the Lower Los Angeles River through Long Beach, Compton and Paramount is one of the most important bird Areas of Audubon California even though it is a concrete channel. During the summer, a thin sheet of treated wastewater forms in the river channel, and becomes rich with algae and micro-invertebrates. Although this is a totally human-made environment, it has replaced formerly extensive shorebird habitat once present in the vast marshes along the coast of the Los Angeles Basin (e.g. Long Beach/Wilmington). Between 8,000 and 15,000 shorebirds per day have been recorded, and more than two dozen species of sandpipers and plovers. The importance of this site has been acknowledged by the California Coastal Conservancy in 2000, and by the Bureau of Reclamation in 2004, but not by this DEIR. The Master Plan and the DEIR must acknowledge the importance of the habitat values of the lower Los Angeles River, state the need to preserve them, and ensure that proper flows for shorebirds during the late spring through fall months (until the start of the rainy season) during and after the river revitalization shall be shallow but sufficient to cover significant areas outside of the low-flow channel in the center of the river bed as too much or too little water downstream during these months can greatly reduce the habitat value for shorebirds.

For another instance, Los Angeles Audubon and others have created the Sepulveda Basin Wildlife Center over the last more than twenty years as a result of litigation against polluters. The re-vegetation is acknowledged as riparian habitat in the DEIR, and has become an important wildlife area and passive recreation area that is used by wildlife no longer found in most areas of Los Angeles. This habitat is important for birds as well as providing education and passive recreation opportunities for Angelenos although as yet no endangered or threatened species nest on the site. The DEIR fails to address the impacts to this habitat by the project.

We look forward to working together with the City of Los Angeles on the revitalization of the Los Angeles River.

Respectfully submitted,

Gary George
Executive Director
Los Angeles Audubon
Letter O-9

From: Lupe Vela
To: Carol Armstrong, Claire Bowin; trothman@lacity.org
Date: 3/1/2007 5:22:43 PM
Subject: Fwd: some thoughts for the River plan

Please add to comments.

>>> Gerald Gubaten 3/1/2007 5:18 PM >>>
Kim Benjamin represents an investor fund which owns property in Chinatown. He is also pres of the BID. See his comments below. (I haven't read the voluminous 10-page text he has forwarded to our office).

>>> "Kim Benjamin" <Kim@laerc.org> 3/1/2007 9:05 AM >>>

I would like to have these ideas considered for inclusion into the new specific plan being created for the River Project and specifically for the Nodes to be created around Chinatown and the Arts District between Broadway bridge north of Chinatown down to the 4th street bridge in the Art District (these thoughts are in no particular order):

O-9-1: Comment acknowledged.

1) M zoning restrictions for change in use should be eliminated to encourage development of mixed use and housing and other commercial property.

O-9-2: Comment acknowledged.

2) TFAR should be implemented within the specific plan being defined to encourage same.

O-9-3: Comment acknowledged.

3) Special density and FAR bonus incentive should be provided such that the entire area is zoned 3 to 1 FAR to begin with, then add to this these options to be elected by developer: (i) anyone dedicating 20% of their total square footage and units (i.e. 20,000 feet and 20 units out of 100 unit 100,000 foot apartment or condo building) to workforce housing defined at 110% of AMI or for seniors 55 or older, will be allowed to increase their FAR and Density by 50% and will have their parking requirements dropped to 1.25 car per unit; or (ii) anyone dedicating 30% of their square footage and units to same standards will be allowed to double their FAR and density and will have their parking requirements dropped to 3.333 cars per unit.

O-9-4: Comment acknowledged.

4) we should not allow any cars to drive or park within 500 feet of either side of the river... we need set backs and way not creative connections to community... so lets terrace the area to the river along th entire breath of it and make walk ways, pocket parks along river and restaurant zones, and hotel zones, commercial retail zones for market/grocery store and retail improvements... along river to encourage community life.

O-9-5: Comment acknowledged.

5) we need to create school and health care zones as well to encourage building of same... we should require per the plan that a middle an elementary school be built within 2 years of passing this specific plan, and that a hospital or out patient care facility be built as well for public access and use,

O-9-6: Comment acknowledged.

6) if you can pick up the existing train lines that separate th community form access to the river... these need to be moved or dropped below grade and built over so that the community we are creating is not walled off so to speak form the very river / community resource we want to access... THIS IS CRITICAL.

O-9-7: Comment acknowledged.

7) we should create pedestrian and public safety zones such that we install good lighting with benches and street art (such as bronze and also walks of fame to commemorate the great history of the river and its
Comments

impact in the area (Angel’s Walk type combined with walk of fame like in Hollywood depicting in our case significant family contributions, explores, and educating related materials) for areas and provide police watch daily 24-7) horse back and or bike and or walk the beat police are best.

8) the plan should provide for a 20 year BID/community group to insure success involvement of stakeholders

9) Tax Increment money should be provide from projects not be built such that these funds will be rededicated back to just this area form which it came.. i.e. to be spent within the same specific plan area on additional housing health care, school projects including buildings to secure the best teachers and facilities possible (The New River School) to service the area

10) no building should be allowed to be higher than 20 stories.. and we should not allow long rows of buildings that could block the river off but at the same time we need to create density zones and nodes of opportunities within the nodes that are being created.. to encourage the building of a community..

Thank you for your consideration

Kim Benjamin, President, LaRoc Funds
2447 Pacific Coast Hwy # 201, Hermosa Beach, CA 90254 800-523-7621 Fax: 310-796-1495 Cell: 310-245-4470; kim@laceroc.com

President, Historic & Cultural Neighborhood Council (HCNC) of downtown Los Angeles www.hcncla.org

President, Los Angeles Chinatown Business Improvement District (CBID) www.chinatownla.com

Board Member, Arts District Business Improvement District (ADBID) http://www.centralcityeast.org/Arts%20District/index.html

Responses

O-9-9: Comment acknowledged.

O-9-10: Comment acknowledged.

O-9-11: Comment acknowledged.
March 23, 2007

VIA ELECTRONIC MAIL,

Carol Armstrong
LARRMP Project Manager
City of Los Angeles
Department of Public Works
Bureau of Engineering
1140 S. Broadway, Suite 600
Los Angeles, CA 90015
Phone: (213) 485-5762
email: engpems@lacity.org

Re: Comments on Los Angeles River Revitalization Master Plan Draft Programmatic
Environmental Impact Report/Programmatic Environmental Impact Statement

Dear Ms. Armstrong:

On behalf of the Natural Resources Defense Council (“NRDC”), and its over 1.2 million members and online activists, with over 250,000 members in California, I submit these comments on the Los Angeles River Revitalization Master Plan Draft Programmatic Environmental Impact Report/Programmatic Environmental Impact Statement, State Clearinghouse No. 2006041050 (hereinafter “draft PEIS”). The Los Angeles River Revitalization Master Plan (“LARRMP”) generally succeeds at capturing the vision of local citizens, activists, and environmental justice advocates that fight to restore the once-vibrant Los Angeles River to previous prominence. And the draft PEIS is an informative and visually inspiring document. Nevertheless, NRDC submits the following comments.

Requirements under NEPA and CEQA

The draft PEIS must comply with the requirements set forth in both the National Environmental Policy Act of 1969 (“NEPA”) and the California Environmental Quality Act (“CEQA”). In this spirit, the City of Los Angeles Bureau of Engineering and U.S. Army Corps of Engineers Los Angeles District have prepared a single document to satisfy state and federal law. But the draft PEIS must nevertheless satisfy both statutes lest it be considered inadequate.¹

Comments

A. National Environmental Policy Act Requirements

Enacted by Congress in 1969, NEPA commits the federal government to “encourage productive and enjoyable harmony between man and his environment” and “promote efforts which will prevent or substantially abate or control seaside erosion and stimulate the health and welfare of man.” To realize these goals, NEPA demands that the “policies, regulations, and public laws of the United States” be interpreted and administered “in accordance with its principles, to the fullest extent possible.” This strong mandate was intended to guide agencies in preparing an EIS, which is required of all projects that “may significantly degrade some human environmental factors.” As the Supreme Court explained:

NEPA’s instruction that all federal agencies comply with the impact statement requirement—and with all the other requirements of § 102—to the fullest extent possible,” 42 U.S.C. § 4332, is neither accidental nor hyperbolic. Rather the phrase is a deliberate command that the duty NEPA imposes upon the agencies to consider environmental factors not be shunted aside in the bureaucratic shuffle.5

The fundamental purpose of an EIS is to force the decision-maker to take a “hard look” at the environmental consequences of her proposal, before a decision to proceed is made.6 The EIS must be an objective, neutral document, not a work of advocacy to justify a predetermined result.7 To help achieve this goal, NEPA sets forth a list of factors that the responsible official must consider “to the fullest extent possible” and include in a “detailed statement”:

(i) the environmental impact of the proposed action;
(ii) any adverse environmental effects which cannot be avoided should the project be implemented;
(iii) alternatives to the proposed action; and
(iv) the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.8

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2 42 U.S.C. § 4321
4 Steamboaters v. F.E.R.C., 759 F.2d 1382, 1392 (9th Cir. 1985) (emphasis in original).
5 Flint Ridge Development Co. v. Scenic Rivers Ass’n, 426 U.S. 776, 787 (1976). The Ninth Circuit has recognized that the congressional mandate to apply NEPA “to the fullest extent possible” is “a direction to make as liberal an interpretation as we can to accommodate the application of NEPA.” Latham v. F.E.R.C., 832 F.2d 389, 398 (9th Cir. 1988) (quoting Jones v. Overton, 792 F.2d 821, 826 (9th Cir. 1986)).
7 40 C.F.R. § 1502.22(a).
The duty to consider “alternatives to the proposed action”—to “rigorously explore and objectively evaluate all reasonable alternatives”—lies, in the words of the regulators, at “the heart” of the entire assessment process. Agencies must “devote substantial treatment to each alternative” and provide support for their decisions to accept or reject them.9

Environmental effects are interpreted broadly to include economic, social and other environmental justice considerations. The “effects” to be analyzed include “ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative.”10 NEPA analysis shall include discussions of the direct environmental effects and their significance, the indirect effects and their significance, the environmental effects of alternatives including the proposed action, and urban quality, historic and cultural resources, and the design of the built environment.11

In addition, the Council on Environmental Quality created the following guiding principles for environmental justice analyses under NEPA:12

(i) consideration of the racial composition of the area affected by the proposed action, and whether there may be a disproportionate impact on minority populations;
(ii) consideration of relevant public health and industry data and the potential for exposure to environmental hazards;
(iii) consideration of “the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action;”
(iv) development of “effective public participation strategies;” and
(v) assurance of “meaningful community representation in the process.”13

B. CEQA Requirements for Mitigation Measures

In addition to the largely procedural requirements under NEPA, the City of Los Angeles Bureau of Engineering and U.S. Army Corps of Engineers Los Angeles District must comply with the substantive requirements of CEQA. This not only requires consideration of environmental impacts and alternatives but mandates feasible measures to mitigate or avoid the adverse effects. This duty is absolute. An agency cannot approve a project if the EIR identifies significant environmental effects unless the agency finds that (1) mitigation measures required in or incorporated into the project will avoid or substantially lessen the significant effects; (2) those measures are within the jurisdiction of another public

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10 40 C.F.R. § 1502.14(b); Natural Resources Defense Council v. Callaway, 524 F.2d 79, 93 n.12 (2nd Cir. 1975).
11 40 C.F.R. §1508.8.
12 40 C.F.R. §1502.16.
Comments

agency and have been adopted, or can and should be adopted, by that agency; or (3) specific economic, legal, social, technological, or other considerations make the mitigation measures or alternatives identified in the EIR infeasible and specific overriding economic, legal, social, technological, or other benefits outweigh the significant environmental effects.  

In other words, CEQA requires the agency to find, based on substantial evidence, that the mitigation measures are “required in, or incorporated into, the project” or that the measures are the responsibility of another agency and have been, or can and should be, adopted by the other agency; or that mitigation is infeasible and overriding considerations outweigh the significant environmental effects. In addition, the agency “shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures” and must adopt a monitoring program to ensure that the mitigation measures are implemented.

Before approving a project for which an EIR is required, the agency must make a finding that the project’s impacts have been mitigated or that such mitigation is infeasible but the benefits of the project nevertheless outweigh the unmitigated impacts. It is important to note that even if the benefits outweigh the impacts, the EIR must contain a finding that the mitigation measures are infeasible.

General Comments on the Los Angeles River Revitalization Master Plan

Not since the Olmsted Brothers submitted their 1930 report “Parks, Playgrounds, and Beaches for the Los Angeles Region” has such a transformational plan with region-wide significance come to the fore. Although differences may exist as to the exact approach to river revitalization, the LARRMP succeeds at addressing historical abuses and presenting a vision for future development. NRDC fully supports these efforts, and offers these comments in the interests of improving the LARRMP.

Failure to Incorporate Multi-Cultural Portrayals — The images scattered throughout the LARRMP fail to capture the multi-cultural values, uses and vision of Angelenos. To the extent that the LARRMP is a visionary document, the visual expression of this vision must correspond to its written expression. For example, although the LARRMP speaks to the diverse population of would-be river-goers, the pictures largely depict Anglo-Americans enjoying the LA River in solitude, with a partner, or as a nuclear family. For many cultures, this is the exception, not the norm, as larger

\[\text{References:}\]
12 Id. at § 21081; CEQA Guidelines § 15091(b).
13 Pub. Res. Code § 21081.6(a) and (b).
16 In 2000, Los Angeles County was approximately 32% white, 44.6% Latino, 9.6% African American, and 11.9% Asian, according to 2000 Census data. In the year 2020, the California Department of Finance projects Los Angeles County to be approximately 26% white, 52% Latino, 8.6% African American, and 11% Asian. See State of California, Department of Finance, Population Projections by Race/Ethnicity, Gender and Age for California and Its Counties 2000–2050, Sacramento, California, May 2004.
gatherings and diverse recreational activities are common. Therefore, we encourage incorporating visuals of Latinos,\textsuperscript{20} Chinese-Americans, African-Americans and other ethnicities engaging in diverse activities, including, but not limited to, barbecues, active team-sport activities (e.g., soccer), and extended or intergenerational-family gatherings.

Native Flora and Fauna – To the extent that the LARRMP uses pictures as a vehicle to represent its vision, the visual expressions once again must correspond to the written expression. There is a disconnect between the pictures, which do not depict native flora and fauna, and the textual emphasis on incorporating native flora and fauna. For example, the “improved Spring Street” image\textsuperscript{21} should portray native canopy trees—such as native sycamores—and other pictures\textsuperscript{22} should depict native bushes and grasses.

Public Art by Local Artists – In addition to providing opportunities to introduce art along the LA River and creating the River Arts Program, the LARRMP should specifically provide space/opportunities for local artists. The LA River is, indeed, “an iconic emblem of Los Angeles”\textsuperscript{23} and the need to adorn it with the work of local artists is important. In addition to areas for art in general, emphasizing spaces and opportunities for local artists will help preserve the LA River’s Angeleno character.

Specific Comments on the Chinatown-Cornfield Opportunity Area

The LARRMP provides too little attention to providing a vision for the Chinatown-Cornfield Opportunity Area. Although some attention is afforded to capturing the collective vision of the diverse coalition that sought to prevent industrial development at what is now Los Angeles State Historic Park (hereinafter “the Cornfield site”), the LARRMP could—indeed, should—go much further.

Require Specific Plan for Chinatown-Cornfield Opportunity Area – It is imperative that the City of Los Angeles secure funding for a specific plan in order to capture community opportunities at Chinatown-Cornfield Opportunity Area before these opportunities are irrevocably lost. The area is under intense development pressures and recent amenities only increase pressures for private development. A specific plan would provide the opportunity to address these immediate threats, which are foreseeable and heightened upon approval of the LARRMP.

Enhance Vision of Chinatown-Cornfield Opportunity Area – It is imperative that the City of Los Angeles articulate a clearer vision for the

\textsuperscript{20} According to California State Parks, Latinos visited two types of park and recreation areas most frequently. Latinos preferred highly developed and developed nature-oriented parks and recreation areas for their recreation activities. California Department of Parks and Recreation Planning Division, Public Opinions and Attitudes on Outdoor Recreation in California – 2002.

\textsuperscript{21} Draft LARRMP at 6-33

\textsuperscript{22} See, e.g., Draft LARRMP at 5-3, 6-13, 6-21, 6-33

\textsuperscript{23} Draft LARRMP at 5-32
Comments

Chinatown-Cornfield Opportunity Area. Recent efforts to revitalize the Cornfield site, the LA River and downtown area are critical steps toward a rebirth of Los Angeles' historic core. Local communities and elected officials have been successful on many fronts: communities effectively mobilized to save the Cornfield site from development; the City of Los Angeles established the Ad Hoc River Committee to oversee revitalization efforts of our historic river and funding grows for La Plaza de Cultura y Arte near Olvera Street, a place honoring Los Angeles’ Mexican American cultural heritage. Instead of disconnected islands of historical, commercial or cultural interest, the Chinatown-Cornfield Opportunity Area and surrounding neighborhoods need to be connected to identify and celebrate our city’s heritage. Interpretive trails, bikeways and riparian habitat along the LA River must connect Taylor Yard to Confluence Park to the Cornfield site—the first step toward a meandering string of parks along the LA River. North Spring Street must include an abundance of large canopy shade trees (native sycamores are the best example), increased median, reduced traffic flow and expanded sidewalks. As such, North Spring Street can provide a pedestrian-friendly promenade between the Cornfield site, Chinatown and Olvera Street. Future improvements could then branch out from existing pedestrian corridors. Ideally, a revitalized Cornfield site and LA River, with their proximity to an evolving urban center, would be a magnet for residents and visitors alike in a seamless flow of connectivity. Although some treatment is afforded, the LARRMP should go beyond mere mention of certain components and discuss in more detail, bringing in these and other elements, as a way to preserve this vision throughout LARRMP implementation.

Provide Vision for Los Angeles State Historic Park – The LARRMP should make specific recommendations on the role of the Cornfield site. As currently drafted, the LARRMP provides too little attention to this important parcel, portraying it as simply a green banana and briefly mentioning it in text. As a microcosm of Los Angeles history, the Cornfield site is illustrative of the transformation of Los Angeles. Each snapshot in time reveals a moment in Los Angeles’ history, culminating in the stirring period that led to the park’s creation. It is our belief that the legacy of the Chinatown-Cornfield Opportunity Area, generally, and the Cornfield site, specifically, will be of its ability to serve as an example of how communities can play an active role in determining the make-up of their neighborhood. In this sense, the attraction of the Chinatown-Cornfield Opportunity Area and Cornfield site is not only their ability to tell the story of Los Angeles’ historical transformation, but its continuing ability to serve as a model to transform the visitor and the city, both today and tomorrow. In this sense, the LARRMP should provide a vision for the Cornfield site itself, and its relationship to immediately adjacent parcels such as the City easement or the MTA-owned triangle at the end of Baker Street, and do so in a way that effectively captures the essential themes of connectivity, cultural/historical, recreation, and transportation outlined in the Cornfield State Park Advisory Committee Recommendations Report.
O-20-3: The EIR has mitigation measures, which would be adopted by the decision makers. Additional mitigation measures are expected to be adopted at the time of approval of specific projects. Each specific project will undergo its own environmental review during which project-specific mitigation measures as well as cumulative impacts would be assessed. The LARRMP calls for subsequent actions starting with development of the River Improvement Overlay (RIO) district and updates of existing Community Plans, which would involve the assessment of impacts related to land use, urban design, development approval, and other changes related to the Los Angeles River. As such, issues related to land acquisition, land use cumulative impacts, and mitigation measures would be dealt with at that time, as stated in the response to Comment O-6-10. Additionally, existing conditions involve the piecemeal development of disparate parcels and the LARRMP’s recommended 3-tiered governance structure is intended to result in an improvement through more streamlined, coordinated oversight of development within the River Corridor (not—as suggested—as a means to exacerbate these trends).

O-20-4: RIO and Community plan revisions will address these issues that are stakeholder-driven. Your comments regarding the Ad Hoc Committee of the Los Angeles River are acknowledged. Such decisions are matters of policy that must be considered by the City’s elected officials subsequent to Plan adoption, should the Plan be adopted. Also, see response above.
O-10-4
the Los Angeles Ad Hoc River Committee will serve as the centralized, vested public entity that can ensure compatibility of future private developments with the LARRMP.

Moratorium on Sale/Transfer of Public Property – The LARRMP should prevent the sale or transfer of public properties to private individuals or public agencies that intend to use the property in a manner that conflicts with the revitalization plan. In this way, the City of Los Angeles will ensure that inconsistent public uses and private transfers do not adversely impact the goals for Los Angeles River management and revitalization.

Specific Plans for Opportunity Areas – The Opportunity Areas are particularly threatened with adverse developments. The focus on five areas for detailed study and heightened revitalization efforts increases the expected adverse impacts from piecemeal development. For example, the creation of the Los Angeles State Historic Park at the Cornfield site and the promise of increased focus and attention by the LARRMP have resulted in a number of uncoordinated project proposals and land grabs by would-be developers. Without a specific plan to ensure that zoning requirements in these areas are compatible with the LARRMP, the concentration of new, incompatible developments in Opportunity Areas will result in significant adverse impacts.

As but one illustration of this point, the proliferation of condominium and other high-end developments next to Los Angeles State Historic Park will have adverse environmental impacts that conflict with the positive representations in the LARRMP and draft CEIS. Therefore, a feasible mitigation measure to prevent such development would mandate immediate allocation of funds to finance specific plans for all five areas, to update the outdated general plans and ensure compatible zoning. The need for a specific plan is particularly pressing for the Chinatown-Cornfields and Taylor Yard Opportunity Areas.

Affordable Housing – Rising housing prices in desirable neighborhoods will result in displacement of working-class communities-of-color, i.e., gentrification. This can happen in at least three ways. Firstly, rental units in revitalized areas will command higher rents, displacing long-standing residents who are priced out of now-desirable neighborhoods. Secondly, the increased demand for housing along the Los Angeles River will result in new housing developments/conversions that are not mandated to set aside affordable units, resulting in creation of market-rate units. Thirdly, long-standing public housing units, such as the William Mead homes in the Chinatown-Cornfield Opportunity Area, are slated for removal under the preferred alternative. Each of these adverse impacts can be feasibly mitigated with inclusionary zoning or other affordable-housing measures that provide preferential status to existing residents. Moreover, an Affordable Housing Task Force could be established to identify best management practices for preventing gentrification and displacement.

O-10-5: Comment acknowledged. We concur.

O-10-6: The project area has already registered raises in land prices and has put a strain on the affordable housing and small business sectors. The LARRMP recognizes the need to update existing Community Plans in River-adjacent areas through an extensive and inclusive community involvement process to ensure that LARRMP benefits are as equitably distributed as possible. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suitable to gauge community support. The overall policy of the Plan is to encourage the retention and strengthening of stable residential areas, and to balance this with a long-term program to acquire properties for flood protection and River improvement. However, a strategy to ensure protection against these incompatible uses is the adoption of the LARRMP, which would trigger Community Plan revisions.

O-10-7: Any impact on housing would be mitigated per the City of Los Angeles policies promulgated by the City’s Housing Authority related to relocation, compensation, and affordable replacement. Additional measures could be developed at the time of the RIO district determination, based on specific community input and needs, subject to further environmental review.
Prohibition on High-Speed Rail in Critical Areas – The California High-Speed Rail Authority has proposed a bullet train corridor that could potentially spoil newly created and planned recreational areas at Taylor Yard State Park, near Cornfield State Park and along the Los Angeles River. The “corridor for further study” between Burbank Airport and Union Station contains alignments that would physically obstruct access to Cornfield site, LA River and Taylor Yard Park; wedging portions between two active rail lines; creating visual blight and noise pollution for picnicking families, soccer players and people simply seeking peace and quiet; and forcing residents to cross various transportation corridors to gain access to these revitalized areas. This harm to our parks and recreation areas is unnecessary and can be guarded against by commonsensical protective measures such as buffers along LA-River banks, and precluding development on the Metrolink or San Fernando Road.

I look forward to working toward implementing the LARRMP. If you have further questions or comments, please do not hesitate to contact me at: (310) 434-2300 or tgrabiel@nrdc.org.

Tim Grabiel
Project Attorney
Natural Resources Defense Council

O-10-8: Comment noted. The City has been contacted by the California High-Speed Rail Authority regarding the bullet train. We continue to work with them to ensure that the LARRMP project components are taken into consideration in their environmental document.
Letter O-11

Comments

From: lamy@northeasttrees.org
Sent: Tuesday, March 27, 2007 10:35 PM
To: engplan@leRoy.org
Cc: lamy@northeasttrees.org
Subject: LA River HMP Site - Comment on Master Plan

Comment Type: Comment on Master Plan

Subject: Comments

Comment:
March 26, 2007

Ed Reyes, Chairman
City Council Ad Hoc Los Angeles River Committee

Dear Ed:

I would like to thank you for your leadership on this milestone in urban planning in Los Angeles. On behalf of the entire staff and board at North East Trees, we applaud your tireless efforts on behalf of the City, to develop a vision for integrating the Los Angeles River into a more sustainable urban fabric. As you probably already know, our approach to creating sustainable transformation of this resource has been a more organic finer grained bottom-up approach. Our experience has informed us that sustainable transformation requires Community Stewardship, which begins with the idea of the character of the transformation, and continues through planning, design, development and, to finally, what we call "adaptive management." We recognize the efforts of the Los Angeles River Revitalization Master Plan team to involve the community in their planning and design process. We look forward to this involvement continuing into future phases of the "Revitalization Process." A robust community-involved process will produce sustainable outcomes that a more typical top-down development process can never produce.

Though our Mission, "To restore nature's services in resource-challenged communities, through a collaborative resource development, implementation, and stewardship process," and appear to be incompatible with active recreation use, park development, we believe strongly that all park land can be "multi-purposed." This will require creative collaborations amongst various environmental, environmental justice, social justice, and at-risk-youth intervention community based organizations. We will all have to reach beyond our current comfort zones for these collaborations to result in true transformation of how we design, develop and maintain open space/parks. We also wholeheartedly support the Plan's "Goals for Los Angeles River Management." Revitalization begins with connections. The process of creating connections from neighborhoods to the River creates awareness. Awareness opens access to networks of resources that can catalyze urban reinvestment. It is absolutely key that the process of revitalization lives beyond changes in political leadership, as true revitalization will span generations of residents of Los Angeles. It is also critical that River Management be "nimble." Community based organizations and non-profits are often in a better position to respond quickly to changing conditions and opportunities. Building capacity within such organizations should be a goal of River Management. One aspect of River Management that will be critical for its success is the creation of a rational streamlined development approval process. Our experience has informed us that the biggest barrier to successful project implementation is the lack of such a process. Development guidelines and an "authority" that is tasked, empowered and adequately funded for true "adaptive management" is imperative if we are going to see the creation of a transformed and ecologically sustainable Los Angeles River environment.

Our staff, here at North East Trees, has compiled a list of suggestions for improving the Plan in its current incarnation, and also suggestions for future directions. The following pages are devoted to that substantive
Again, thank you for your leadership. We look forward to working with you and all the other leaders and stakeholders of the Los Angeles River towards a successful implementation of this plan.

Sincerely,

Larry Smith, Executive Director

Specific LA River Revitalization Master Plan Comments/Suggestions: Bikeways and Connectivity

We would like to see the completion of the Class One Bike Way through the confluence of the Arroyo Seco and the Los Angeles River. This will require getting the stakeholder agencies to agree on one alignment and on seeking funding for long term construction and operations and maintenance. We applaud your efforts at finally securing the MTA funds and the City match to build the bridge across the Los Angeles River, at Taylor Yards in Elysian Park. We believe at least one more crossing is vital to the connectivity of the Corefields and Taylor Yards nodes to Downtown and Pasadena, via the Arroyo Seco and to the Valley via Griffith Park. We need leadership and vision to add this connection to the proposed blueprint.

Below, we submit our comments on the plan in two parts. Part One consists of comments on the text of the plan. Page number and section number references relate to the numbering system used in the Revitalization Plan. Part Two is a formal letter submitting comments on required programmatic EIR/DEIS document on the proposed plan. We recommend a lighter footprint on the river. We do however find much of the visioning compelling and larger applications of small pilot projects we at North East Trees have been designing and implementing in a real world basis, with County of Los Angeles Proposition A Funds, since 1992.

Part One: Comments on Text of City’s Revitalization Plan

Though we understand that the Master Plan is designed to be a visionary blueprint of the transformation of this important resource, we see a need to move more quickly towards developing realistic cost projections for the public improvements envisioned in the plan. We understand the need to attract private investment, without which this Vision would not be realized. Towards this end, a priority should be given to establishing and funding the proposed “Management Structure for a Revitalized River”.

In addition, a more explicit recognition and delineation of what has worked to date to develop open space improvements along the Los Angeles River, San Gabriel River, Arroyo Seco and other local tributary corridors should be added to the Plan. As North East Trees has designed, built and maintained such projects along such corridors, we will be happy to provide text that could meet that end. In the evolution of any ambitious transforming process such as the revitalization of the Los Angeles River, “lessons learned” properly articulated and understood contribute greatly to the process.

Section 1: Ground Work

This section lacks a list of constructed pocket parks and other landscape improvements along Los Angeles River Parkway, and does not give credit for design and construction of each photographed project, to appropriate agency.

Attachment 1: We will be pleased to share a project list, with photographs of work, along the Los Angeles River. Please provide us with adequate intellectual property ownership in your publications – we will send this information along through a separate channel to the Project Team Page 2. Text says city has invested in parks along the river. Need to add examples of projects funded and maintained by City, State, County and non-profits.

Text should mention Mayor Bradley’s efforts, and the County’s Master Plan, and their current efforts. There should be more coordination among the agencies. Need to create a working group similar to the one that began to send out bike path alignments in 2001. Need to reference the Los Angeles River Management and Maintenance Task Force that meets regularly to sort out issues related to operations and maintenance.

Councilman Garcetti’s office has taken the lead on this.

Text should outline the regime for permitting and building parks along the river, and explain the challenge of securing funding for operations and maintenance to the public. The Plan should make it easier to develop more of these small park projects and should expedite continued bike path, and the required coordination with other agencies.

Additional Resources: LA City must approve installing signs for the River and agree to maintain them. L.A. County currently installs river signs on Riverside Drive and maintains them. They can provide additional leadership on bike routes and paths. The County also offers resources through the Open Space District Interest program. Towards this end, grant cycles should be referenced, to provide some context for action by the City Council and the Mayor.

Section 2: Community Opportunities:

F-112
Comments

For these to work, the public needs to believe there will be a planning process that is transparent and fair. Infrastructure for river needs to be thought out and put into a specific plan or overlay zone, so that when new development is proposed, city departments know what the priorities are and costs and mechanisms for implementing improvements. Standards for improvements should be adopted as soon as possible.

River Overlay Zone: We want to understand how this will work, what kind of language it will contain for publicly owned lands, will it facilitate non-profit restoration projects? Will it explain who is responsible for enforcement? Will it be co-terminous with the entire stretch of the river?

If the report states 32 miles as the length of its jurisdiction, this should be clarified. Perhaps a clarifying map would explain jurisdiction of LA City. Do you have any recommendations for a regional approach?

Management Structure:
We believe a JPA with special district funding that allows a blending of flood control, water quality, water conservation, and recreation funds and functions is what is needed. However, we would prefer a "resource conservation district" type of governance structure, which would allow a small agency to work with a team of expert adaptive management resource managers to develop these types of projects.

We also like the Los Angeles River Management and Maintenance Task Force as a model for interim projects, and for working out protocols for better maintenance, cleaning, public safety and adding lighting and for completing projects that are already funded.

We also recommend looking at other examples of open space districts in Marin County, and Santa Clara County, which may provide additional models for managing this type of resource.

p. 3.9: Water quality issues
The City should adopt new Standard Plans to allow a roll out of "Green Streets" at least along streets within 1/2 mile of the Los Angeles River, Arroyo Seco, Tujunga Wash, Compton Creek, and Ballona Creek. In addition, we strongly recommend that the City adopt new building and safety codes to encourage the reduction of wet and dry weather water runoff from private and public properties for the purpose of groundwater recharge or gray water reuse as irrigation water. We will be completing the first "Green Street" in Los Angeles this Spring in partnership with the Bureau of Street Services Special Projects Division. Design for this project can be used to develop new Standard Plans for Green Streets. An important related step would be to develop an official "Green Streets Designation" that will have its own set of Standard Plans. North East Trees will be glad to participate in the development of those Standard Plans and in the development of a "Selection Criteria Matrix" that can be used to p. 3.10 Riparian Wetlands: We would strongly urge you to include the Hazel Stream-Wetland Restoration Area to the list of significant ecotopes in the revitalization plan. We have completed a biological survey for this project area that we will be happy to share with your Project Team. We also believe that Debs Park, Ascot Hills, and Glass Park provide important natural resources that should be mentioned in all of your base maps in this section. You should also include sites at Whittier Narrows, on maps that extend out to include that area. There are also some ecologically significant areas in the South Gate reach at Imperial Highway. The Rivers and Mountains Conservancy (RMC) is working with USC Green Visions to map all of these regional resources. You might want to review them as well. Natural area resources within the eastside communities of Los Angeles should be referenced. We also believe that the 710 freeway expansion planned through the El Sereno community will run over old rivers, streams, and riparian resources that could otherwise be restored to a more natural state. We believe that this will have a negative impact on the neighborhoods on the Eastside of Los Angeles, and that there should be some discussion about the LA River, the 710 expansion, and opportunities for mitigations opportunities. CSULA, University Hills, Baldwin Hills, and area resources that should be included in your maps.

p. 3-12: Green Space:

p. 3-14: Transportation
The railroad r.o.w. is still shown through Hazard Park. The tracks are no longer there, though the r.o.w. remains as a golden opportunity for a bike/pedestrian linkage from Ascot Hills to Marengo Street at the southern terminus of the Hazel Stream-Wetland System Restoration Project Area. With some creative planning a linkage could be completed to the Los Angeles River. The national Rails-to-Trails Program has created many such connections across the country and should be referenced for this type of work in the Plan. We also believe that a discussion about the proposed 710 freeway expansion and the effects on the LA River Greenway is appropriate for this section.

p. 3-17: Bike Plans:
This section would benefit from more details or at least description of already funded projects such as the Fletcher to Barclay stretch of LA River. This has been funded for 10 years and exemplifies why a rational "River Management" structure is sorely needed. Your maps don't show what is funded and real, and what is proposed. You also do not prioritize the gaps that are priorities and require coordinated implementation.

Responses
Comments

There should be more information about what will be needed to ensure a coordinated River Bikeway Plan is planned, designed and developed. In many other parts of the county, rivers are the main corridors for Class One Bike Paths.

p. 3–19: Watershed Approach

We agree that a watershed approach should be incorporated into this planning effort for the corridor. However, it is understandable that the City took the corridor approach, as they seem to envision redevelopment of industrial zoned lands with housing or commercial retain. Regardless, we would like to see the Eastern Tributaries documented in this plan. We are working on developing a East Los Angeles Holistic Watershed Planning study for the areas that are east of the Arroyo Seco. This study is referenced in the RMP recently adopted by the County of Los Angeles on their plan. It’s headwaters begin in the City of Los Angeles, El Serreno, with underground streams that need to be researched and documented. North East Trees is seeking grant funding for this watershed plan. From the Rivers and Mountains Conservancy and other state sources. We also urge the city to adopt a watershed approach to its L.A. River planning efforts p. 3–22:

Plan Approach We are surprised to see that the City is recommended a top down implementation paradigm for this plan. We expected to see a plan that would continue to encourage the development of organic infill projects at the grassroots level. These projects have not cost the city any money either for development, or for operations and maintenance. We are surprised that this plan does not lay out a framework for the development of standards for new public projects or for private developers adding mitigations in the public right-of-way.

We are disappointed that there are no recommendations for the development of implementation strategies. It is unclear what the City’s priorities are, other than the goals laid out in Chapter 4. We disagree with the priorities implied in this section. We will be very interested in how responsibilities will be delineated across city departments for the completion of projects already funded, but not developed.

p. 4–3: Goals

We are concerned about the site of these projects and the social impact on adjacent property owners. Enhance water quality is important, but rather than creating new wetland in the near term along the river which is expensive and disruptive, we believe that it makes sense to look at the tributaries and in the watershed to find projects. We need to demonstrate how stream-wetland restoration can work in smaller scale projects, and use those lessons learned to increase the scale at the Los Angeles River. We would argue that the City should continue to work with agencies to find small infill projects with existing resource value, so that the restoration costs less and is of a more appropriate scale of project.

All river projects should be connected with a class-one bike path from Union Station to Sepulveda basin, as a 25-year goal. As an immediate 3–5 year goal, we recommend the City officially adopt a bike path alignment from Griffith Park to Union Station. The larger scale project contained in this report is noble, but it should not distract from improving safety and public access to the river for the residents of the City that goes on everyday without the benefit of this Plan. This is especially so for those residents living in the marginalized neighborhoods along the Los Angeles River from Elysian Valley south.

p. 4–7: Concurrent Planning Efforts:

The Plan does not mention the double watershed plan by the RMC and the SMMC. It does not mention the Arroyo Seco Watershed Management Plan, nor the Green Streets Project by NET. Nor, did we see details about the US Army Corps Role, the studies that are making, or new partnerships and what the Corps wants to help us do.

p. 4–12: Functionality of the river and wetlands, where there is little left is expense to duplicate.

We would argue that the plan also allow for identifying degraded resources within the tributaries of the LA River, and allow funding to be used for their implementation as well as for the corridor plan. There are dozens of buried streams and arroyos in the City. We know of Hazard Stream and welwood, Arroyo Rosa Castillo (adjacent to the CSULA and the 710 freeway), Elephant Hill Stream, and the Ascot Hills Stream. These are but a few, but they should not be exempted from Proposition O funding or other clean water funds, because they are not included in the corridor plan. Rather, the corridor plan should include a section on tributaries (as they do for the Valley), so that these projects qualify for funding in the future. The City should also offer to do a joint watershed plan with the County, and other cities, as required by state water bonds.

p. 4–13: Opportunity Parcel River Glen

Why does plan propose a ‘top down’ approach for ecological restoration. We would argue that restoration projects need to make sense, financially, and environmentally. In contrast to your approach for River Glen, we understand that Cal Trans has already approved a redesign for the confluence of the 134 and the Interstate 5. What we call ‘Polywraps Park’ was just selected to receive funding from the State Regional Water Board. Our approach is to restore ecological functionality to the site, with low technology approaches. Please remove language about tributaries being outside the scope of this plan. This plan will be used for funding.
Recommendations and projects that improve quality of water and natural ecosystem functionality of tributaries should be included, generally.

O-11-1: Comment acknowledged.

O-11-2: Comment acknowledged.

The use of tributary is very important for future funding opportunities. The County's Master Plan focused on the corridor, however funding from Prop A open space district, defines river funding, as going to corridor or tributaries.

Add Hazard Stream-Wetland System Restoration Project Area to the list of rivers and tributaries and to the maps please. The use of tributary is very important for future funding opportunities. The County's Master Plan focused on the corridor, however funding from Prop A open space district, defines river funding, as going to corridor or tributaries.

Two important projects need to be added to the sites listed as possible opportunity sites:

1. The Hazard Stream-Wetland site was first referenced in the Wetlands Recovery Plan of 1998. Then the Los Angeles and San Gabriel Rivers Watershed Council adopted it as a project and funded a feasibility study completed by Pomsas. In 2005, North East Trees entered into an agreement on the Hazard restoration project with the expectation that the City will adopt the project as a capital project by December, 2007.
2. We believe that while Hazard Park is not currently included in either the Lincoln Heights Neighborhood Council, nor the Boyle Heights Neighborhood Council, we believe that it should be added to the Boyle Heights Neighborhood Council, when it becomes reorganized. We believe that the USC/LAC Medical Campus also be included up to Valley Boulevard, as the historic tracts were originally laid out. This is part of the Eastern Tributary of the Los Angeles River.
3. A historic stream remnant in City Park land should be a priority project for implementation, and for public funding, and for call out as a watersheds project. Such tributaries should be looked at as a priority in the corridor as indicated in the Los Angeles River Corridor.

The plan in general ignores the significant habitat and ecological restoration opportunities offered by the Arroyo Seco Watershed. The Arroyo Seco comprises approximately 5% of the LA River Watershed, and provides the most direct and unobstructed corridor between the San Gabriel Mountains and the Los Angeles River Corridor. The critical bottleneck in this corridor exists in the Los Angeles portion of the Arroyo Seco.

The plan does not highlight the opportunities presented by land owned by public entities including the City of Los Angeles adjacent to the Los Angeles River. These properties are adjacent to the Lincoln Heights Gold Line Station, and could provide Gold Line rider access to the LA River and other amenities of the Taylor Yards zone via the Arroyo Seco.

Part Two: Comments on Programmatic EIR/EIS
1. Biological resources: The Hazard Stream-Wetland System Restoration Project would create a high value habitat which should be included as a project alternative that can be implemented within the next 5 years in a far more cost effective manner than recreating wetlands within the same time frame along the Los Angeles River channel. This would be the first true stream-wetland restoration project in Los Angeles and could be used as a demonstration project for what would be possible along a longer stretch of the Los Angeles River; it could also provide some mitigation of negative air quality impacts indicated in the Programmatic EIR/EIS.

Environment Justice: We prefer lower impact alternatives that can be implemented as a distributed network of projects in less time, for less money and with a greater positive impact across more already.

O-11-1: Comment acknowledged.

O-11-2: Comment acknowledged.
O-11-2: Impacted/marginalized communities.  
3. We believe that the City should require a housing replacement policy in this river overlay district. This should be required especially of public agencies but also for private developers who displace low-income rental housing units, or ownership units. Removal should be contingent on either an in-kind replacement fee, be paid to a regional entity, with a public process for expending it. (See LAC-USC Medical Center EIR, 1999)

O-11-4: We would recommend a more organic approach to revitalizing the river reducing the need to displace people and businesses, until so determined by a project specific EIR.

O-11-5: Hydrology, Flood Plain and Water Quality: Watershed Planning approach is called for in the plan's text, but it is not clear who or when it actually gets implemented.

O-11-6: Land Use: We would very much like to see specific recommendations regarding proposed land uses, along the river. It is very unclear in this revitalization plan, which areas are being recommended to revert to residential, which areas of existing industrial, need to be changed to open space to reflect the new parks, etc... We don’t understand how one might measure impacts, if there are not specific land use change referenced. These recommendations should be circulated forthwith and appropriate planning processes should be adopted and followed.

O-11-7: Public Health and Safety: Currently, the City of Los Angeles does not enforce nuisance abatement codes against its contractors on its property in the vicinity of the Los Angeles River and the confluence with the Arroyo Seco. We have reported the Avenue 15 Bridge and the San Fernando Road Improvement to the Council office who sends it to a City bureaucrat who says he doesn’t have a contract clause allowing him to require the contractor to point out graffiti.

Public health and safety are number one concerns. More police and park rangers and lighting, and graffiti removal services, are going to be required, if planners start listening to the public. Aesthetics greenery, lighting, and security are important resources needed in abundance at these outdoor sites, to preserve them as parks people feel safe visiting. Areas are dumping sites, e.g., on the bike path at access road ramp entering Arroyo Seco at Confluence with the Los Angeles River.

O-11-8: Why is the LA River bike path still delayed, although it is funded, from Fletcher to Barcley? The City owes the residents and non-profit organizations an update. Why isn’t this listed in the revitalization plan? Doesn’t the City care about these paths being completed in a timely and efficient manner? Don’t they worry that if they delay, people will grow tired and not want to support public projects?

O-11-9: Socio-economic conditions: The large scale of the proposed revitalization projects will have serious impacts on adjacent communities and property owners. Based on how slow even bike projects move, on land that has underlying owners, we recommend that the city work on projects they already own, and then look for opportunities to support projects?

O-11-10: The bike path must be completed. It has taken too long and we are legitimately concerned about the city not having the capacity to deliver on such a grandiose plan. We therefore recommend that the Plan begins by building on existing incremental gains in strategically targeted areas that can be implemented within the next 3-5 years.

O-11-11: Transportation: we strongly recommend that you include bike transportation and access, linkages, bridges, and a proposed class one LA River Bike path, on both sides of the LA River in this master plan. If not here, where? When? We have been waiting for years for the City to do this plan. However, it is not clear that the MTA, and the County coordinated closely with the City in the river revitalization plan, due to the lack of bicycle information contained in the plan. We urge you to work more closely with the MTA and the County’s bike programs people, and the LA County Bike Coalition. In addition, the City should work with us at North East Trestles and other volunteer architects and cyclist, for the safest, least expensive and most direct means of crossing the LA River at Carrefords and connecting up the vicinity of Taylor Yards State park and the bridge the MTA is building across from Taylor Yards, to Elsinar Valley. NET has copies of 2001 City County bikeway working groups final report attached, for your review. The MTA and the County can assist you in this endeavor. Bike bridges can begin to mitigate the impact of the city permitting utility corridors to be built along the river, and not allowing the public to access the service roads. Once the city succeeds in securing bike path funding, and once they complete building the improvements with safety features, lighting, and a sail, the negative effects of its design and single purpose of its roads (flood control operators) can be mitigated.

We recommend that the city develop a list of mitigations, and infrastructure improvements needed with cost estimates and within one year have a developer fee for river related public improvements, as a precursor for development permits in the zone.

O-11-3: See response to Comment O-7-4.

O-11-4: Comment acknowledged.

O-11-5: The PEIR/PEIS incorporates by reference the Integrated Resources Plan (IRP) EIR approved by the Los Angeles City Council in 2006. The IRP dealt with regional water related issues in terms of the regional runoff management, groundwater recharge, water recycling and reuse, as well as wastewater management. Concurrently, the City is involved in the preparation of the Integrated Regional Water Management Plan, which is under the leadership of the Los Angeles County Department of Public Works. These and other management efforts affecting the watershed are referenced in the PEIR/PEIS to ensure consistency with a watershed planning approach, which can be the basis for future LARRMP collaborative planning, project implementation, and funding partnerships.

O-11-6: See response to Comment O-7-4. Also, concurrent with the adoption of the LARRM, the plan recommends that the Department of City Planning initiate review of the General Plan, Community Plan, and/or Specific Plan requirements, including public outreach, to ensure conformity with the goals and objectives and policy recommendations contained in the LARRM. Specific land use measures and changes will be evaluated at that time. Design standards and guidelines with the River Improvement Overlay (RIO) district will also be evaluated and will involve public participation and additional environmental review.

O-11-7: Comment acknowledged. The LARRM’s proposed 3-tiered river management structure is intended to address issues, such as maintenance and security, in a more streamlined and efficient manner.

O-11-8: Comment acknowledged. We concur.
O-11-9: The LA River bike path from Fletcher to Barclay is funded. The City has been in the process of acquiring rights-of-way and easements to complete this project. This process requires strict adherence to legal procedures, especially when there are land owners who are unwilling to support the project. The City has informed both the public and the non-profit organizations about the progress made through monthly reports to the Los Angeles River Master Plan Advisory Committee.

O-11-10: Comment acknowledged. We concur. As you have suggested, existing City projects and City-owned land are priority opportunities for LARRMP implementation.

O-11-11: Comment acknowledged. We concur. These collaborations will become even more critical upon Plan adoption as specific projects move forward. Additionally, your participation is encouraged as the City’s Planning Department and Department of Transportation move forward in updating the Bicycle Plan and General Plan Transportation Element (to be renamed as the Mobility Element).

O-11-12: Comment acknowledged. We concur.

O-11-13: Comment acknowledged.
Letter O-12

Comments

O-12-1: This study was fatally flawed from the beginning - severely hampered by an inappropriate narrow scope of work that precluded the requisite watershed approach. Absent a proper scope general faulty conclusions are inherent to the plan. The City of Los Angeles could have - and should have - done a better job.

O-12-2: One of the key values articulated by the community during the public participation process, as noted on pg. 28, is a system-wide perspective toward the Los Angeles River. However, the scope of work that the planning team had to work within was limited to a very narrow corridor making that perspective impossible. The last paragraph on pg. 29 recognizes this; however the fact remains that while it may be beyond the scope of the plan as scoped, it certainly should be the scope of the City’s responsibilities.

Responses

O-12-1: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-2: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.
### Comments

<table>
<thead>
<tr>
<th>No.</th>
<th>Comment</th>
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<tbody>
<tr>
<td>O-12-2</td>
<td>The scenarios outlined on pg. 3.5 relative to velocities do not support the facts. Current velocities in the Elysian Valley reach exceed 12 feet per second (as noted in the graphic on the preceding page) yet vegetation there has sustained remarkably well. The existence of vegetation reduces velocities in and of itself, so targeting a reduction in flow velocities of 12 feet per second as a pre-requisite to consideration of reintroducing vegetation seems extreme.</td>
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<tr>
<td>O-12-3</td>
<td>The diagrams on pg. 3.5 showing that making ‘the River’s surface area 100% green’ would require 4.7x the existing channel capacity is misleading. It again implies that no changes would occur in flow attenuation, land use or development ordinances, or in total impervious surface areas throughout the watershed. It also presents a generic assumption that does not apply consistently throughout the various reaches of the river. It has the overall effect of falsely (and possibly intentionally) lowering the public expectations of what is possible.</td>
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<tr>
<td>O-12-4</td>
<td>While it would be germane to the consideration of attenuating volumes and velocities, there is no evidence that the team accessed The River Project’s ‘Hydrodynamic Study for Restoration Feasibility of the Tujunga Wash’ produced for the Coastal Conservancy in 2002, nor our 2006 ‘State of the Tujunga – An Assessment of the Tujunga/Pacoima Watershed,’ produced for the CALFED Bay-Delta Watershed Program.</td>
</tr>
<tr>
<td>O-12-5</td>
<td>Similarly, although the document text briefly mentions the existence of various watershed management planning efforts, you neglected to study or reference the extensive research and findings included in the Arroyo Seco, Sun Valley, or Tujunga Watershed Management Plan efforts.</td>
</tr>
<tr>
<td>O-12-6</td>
<td>There is no evidence in the plan to support the repeated statement that the plan ‘provides a framework for restoring the river’s ecological function, nor that the plan seeks to strengthen and provide practical ways to implement core recommendations’ set out in any watershed management plans. In fact, the first, second and last of the five core recommendations inherent to those plans which are summarized on page 3.18 are outside the plan scope and as such, the plan itself is generally antithetical to the very principles of watershed management, which require integrated study and consideration at a watershed or at least subwatershed level.</td>
</tr>
<tr>
<td>O-12-7</td>
<td>Restoring ecological function would require restoring hydrologic function. Using the HGM and HEP criteria proposed pages 4.19 and particularly at the top of 4.20, none of the proposed alternatives for the five opportunity sites would pass muster.</td>
</tr>
<tr>
<td>O-12-8</td>
<td>For example while the Canoga Park site proposes significant land acquisition, the river’s natural flow regime is ignored in favor of aesthetic design. Concrete persists, turf grass prevails and even at this site, bioengineered banks are not considered. A rubber dam is proposed to create a pond which would have to be lined to maintain itself if the concrete bottom were removed (a possibility here where such significant floodplain acreage is acquired) and which would be nothing but a potential aesthetic amenity if it were not.</td>
</tr>
<tr>
<td>O-12-9</td>
<td>The proposed water quality wetlands at River Glen and Taylor Yard would likely have to consist of predominately non-native vegetation. The City’s previous treatment wetland proposal for Sepulveda Basin did not qualify as native habitat restoration. There is substantial literature on the conflict between habitat restoration and treatment wetlands, though none of it is cited in the reference section of the document. Again, no bioengineering of the banks is proposed. (References in figures to the ‘Future State Park’ should be changed to ‘Río de Los Angeles State Park.’)</td>
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### Responses

<table>
<thead>
<tr>
<th>No.</th>
<th>Response</th>
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<tr>
<td>O-12-3</td>
<td>Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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Public Comments and Responses

Comments

O-12-9: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-10: Comment acknowledged. The images of the flow diversion channel and habitat island are conceptual, since no design has been done to determine the feasibility of bioengineering—which is recommended whenever possible—or the need for channel lining. The intention of the Revitalization Master Plan is to balance the needs and desires for recreation, habitat, water quality, and economic vitality. There have been many in the public that like the idea of a recreation lake. El Pueblo Lake is not included as a potential project in the LARRMP. The El Pueblo Lake concept was an in-channel concept, within the existing concrete channel. By comparison, the diversion channel and habitat island in the Plan would incorporate ecosystem functionality. The comments provided on the El Pueblo Lake project can be included by reference in future environmental, site-specific environmental analyses.

O-12-11: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-12: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-13: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-14: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

O-12-15: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

Responses

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O-12-13: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.

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O-12-15: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.
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<td>O-12-15: The site is limited to the amount of development that the City will support and the foregone assumption that the City will grant a zone change to facilitate it. If the City is at all serious about acquisition of key parcels of floodplain lands and restoration of ecological function, it must deny the applicants request for a zone change and work to acquire this parcel.</td>
<td>O-12-16: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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<td>O-12-16: Focus attention on underused areas &amp; disadvantaged communities' appears to be a new goal one not adopted by council when this plan was undertaken. Does this mean that if a stretch of river with great potential for restoring ecological function exists in an area with sufficient park space it would be a low priority?</td>
<td>O-12-17: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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<td>O-12-17: Given the current and future challenges this City faces with respect to water supply, and the fact that the San Fernando Groundwater Basin is critical to our sustainable future, it is irresponsible to produce a long-range plan for the Los Angeles River that neglects to mention a revitalized river's role in this most important issue.</td>
<td>O-12-18: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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<td>O-12-18: The document touts a ‘transparent public process’ as central to the plan. As a member of the Stakeholder Group, we would have to disagree. High attendance at meetings, edited powerpoint presentations and periodic update flyers with bullet points do not constitute transparent communication. Despite repeated requests for meeting minutes and assurances that they would be provided, there has been NO available record of input provided by advisory, stakeholder, or peer review committees – not to mention no record of the task force input. Given the absence of public record, it is disingenuous to tout transparency, much less to claim that this plan accurately represents the public’s vision.</td>
<td>O-12-19: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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<tr>
<td>O-12-18: Couple of housekeeping notes: Pg 1.6 characterizes TreePeople, North East Trees, Arroyo Seco Foundation and The River Project as simply advocacy groups and credits only Mountains Recreation and Conservation Authority, Santa Monica Mountains Conservancy, Rivers and Mountains Conservancy &amp; LA &amp; San Gabriel Rivers Watershed Council with undertaking significant planning efforts. The Coastal Conservancy should be included in that second list.</td>
<td>O-12-20: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
</tr>
<tr>
<td>O-12-19: In addition, it must be noted that TreePeople produced the Sun Valley Watershed Management Plan (with LA County) and the Hull House demonstration site; North East Trees has developed numerous greenway parks and with the Arroyo Seco Foundation produced the Arroyo Scc Watershed Management Plan; The River Project produced Tujunga/Pacolina Watershed Management Plan as well as earlier studies &amp; planning efforts for Tujunga Wash, Taylor Yard, and, with LA County, implementation of the Valleyheart Greenway. To group these organizations with Friends of the Los Angeles River as merely advocacy groups significantly downplays and diminishes the contributions of their scientific study, robust planning efforts and effective project implementation. Please consider rewriting those paragraphs to provide a more accurate representation of the facts.</td>
<td>O-12-21: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.</td>
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<td>O-12-20: References to Native Americans are inconsistent throughout the document. Recommend standardizing the usage ‘indigenous Tongva peoples’</td>
<td></td>
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</table>
March 27, 2007

Carol Armstrong
LARRMP Project Manager
CITY OF LOS ANGELES
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

Re: Los Angeles River Revitalization Master Plan – Comment Letter

Dear Ms. Armstrong:

Our company, Roll International Corporation, includes an affiliated entity known as “Seventh Street Warehouse Partnership.” Seventh Street Warehouse Partnership is a major property owner in the Boyle Heights area of Los Angeles, and our property is adjacent to the L.A. River.

Our property includes almost 200,000 square feet of buildings on 3 acres of land. The primary building of 196,620 square feet was built in 1923 and is 84 years old. The secondary building of 2,800 square feet was built in 1921 and is 90 years old.

In the draft Master Plan, a large portion of Roll’s property is identified as a “Regional Gateway” area under the “Preferred Alternative.” Under the “Secondary Alternative,” Roll’s property would be in a “Neighborhood Gateway” area.

Comments to City’s proposed “Los Angeles River Revitalization Master Plan”

We offer the following comments to the City’s proposed L.A. River Master Plan that would affect our property holdings:

1. Concerning the area that includes Roll’s property – which is considered part of the “Downtown Industrial Area,” the draft Plan suggests the imposition of **land use controls**:

   “This area is the site of industrial warehouses formerly served by rail. Essentially all rail-served businesses have left the area. None of this rail spurs show signs of recent use east of Mission Road. The neighborhood contains substantial numbers of architecturally interesting buildings, and appears to be experiencing substantial re-use and creative occupancies in many locations. While the area is industrially-zoned, many small and larger businesses appear to be thriving, with artists and living accommodations mixed in among the established businesses.

   The area is under study by the Mayor’s Industrial Task Force and has been identified as an important location for working-class jobs...the area is an important economic support base for the nearby Boyle Heights neighborhood.

   For these reasons, the public appears to support Alternative A, which is these studios, provides for only modest, incremental market-driven land use changes. If carefully planned, River improvements are made here, including new parks, Green Streets and connections shown in this Alternative, then new policies and possibly new land use controls will still be needed to protect existing businesses and users from the land-value escalation that almost certainly would result.”

In the Executive Summary to the Los Angeles River Revitalization Master Plan, under the paragraph entitled “Create Value”, the Plan talks about increasing economic prosperity and creating opportunities for sustainable, economic reinvestment. The Plan acknowledges that value will be created if the Plan is implemented.

O-13-1: Comment acknowledged.

O-13-2: Comment acknowledged. Please note that no definitive decisions regarding future land use zoning classifications will result from Plan adoption. These decisions will take place as community planning efforts move forward—including development of the River Improvement Overlay (RIO) district, the update to existing Community Plans along the River, and should any Specific Plans be initiated for particular areas. Please see the LARRMP Chapters 8 and 10 for information regarding next steps toward implementation and how the City’s community planning process will facilitate implementation of the LARRMP.

Also see the response to Comment T-43-1.
Public Comments and Responses

Comments

To suggest elsewhere in the Plan that new land use controls will be needed to “protect” businesses and uses from the land-value escalations that may arise, is contrary to sound land use planning and market dynamics.

Historically, land uses and businesses have re-cycled in Los Angeles. At one time, most of the San Fernando Valley was used for agricultural purposes by farmers and ranchers. At one time in the early 20th Century, much of what is Downtown Los Angeles’ business district was the site of stately residential mansions. At one time, Century City’s now burgeoning commercial/office area was the backdrop for Fox’s film studio. Should we have had “land use controls” implemented back then to “protect” the Valley’s farmers and ranchers from land value escalation? Should the City have refused to adopt the Century City Specific Plans, to keep the area studio-related uses forever? While in a different city, should the numerous pawn stores and thrift shops in what is today’s “Old Town Pasadena” have been protected from land-use escalations versus allowing market forces to bring about the vibrant retail, movie and restaurant uses that are there today?

When improvements are implemented along a corridor, in an area, or in this case – along the L.A. River - businesses will recycle and land uses will evolve – that has historically been Los Angeles’ and most cities’ response to change.

To suggest in this planning document that “land use controls will be needed to protect existing businesses and uses from land use escalations” seems inappropriate. What is being suggested in terms of protective “land use controls”? Rent control? City subsidies to businesses? New restrictive zoning laws?

Improvement to the L.A. River will likely have a positive economic effect on adjacent properties, whose owners are likely to, in turn, re-invest in their properties.

In summary, our comment is that the Plan’s recommendation for “land use controls” to “protect existing businesses and use” is inconsistent with the Plan’s goal of encouraging reinvestment and new job creation adjacent to the River. Private investment to improve properties in the area will be dis-incentivized by the proposed new land use controls.

Responses

O-13-3: Comment acknowledged. The LARRMP’s proposed 3-tiered River management structure is intended to result in public service delivery improvements by streamlining functions and facilitating collaboration across jurisdictions; thus, issues, such as public safety and policing are expected to be addressed in a more comprehensive and integrated manner. Additionally, all River improvements would be designed to protect and ensure public safety (See, e.g., Chapter 4 of the LARRMP.).
Location and physical characteristics of subject property:
Roll's primary property addresses are 2156 and 2185 East 7th Street - bordered by Myers Street, 7th Street, Mission Road, and Jesse Street. This property's location is shown in the map below.
Comments

The 2185 East 7th Street building is a 3-story structure, shown in the photograph below.

Responses

The 2185 East 7th Street building is a small structure (adjacent to the larger building), shown in the photograph below – it is the one-story, yellow-painted building.
In closing, overall Roll supports the L.A. River Revitalization Master Plan. We especially support the Master Plan’s goals to encourage reinvestment in the areas adjacent to the River. However, we feel that the Master Plan’s recommendation that “land use controls” be imposed on adjacent properties would bring the opposite result — a lack of reinvestment and a lack of new jobs in the area, as land use controls typically are a de-incentive to private investment. And, lastly we believe that there needs to be a more thorough analysis related to security and crime control for new parkland, pedestrian pathways, and recreational areas that will be created as part of the Master Plan, including an analysis of funding for the increased police presence that may be needed to protect recreational users/visitors and nearby properties.

Very truly yours,

Craig Cooper
General Counsel

c: Councilmember Jose Huizar, CD 14
Larry J. Kosmont, Kosmont Companies

O-13-4: Comment acknowledged.
March 16, 2007

Dr. Carol Armstrong  
City of Los Angeles  
1149 S. Broadway St., Suite 600  
Los Angeles, CA  90015

Dear Dr. Armstrong:

The following comments in regards to the PEIR/PEIS and Master Plan for the Los Angeles River Revitalization Project are provided by the San Fernando Valley Audubon Society.

Comments #1 - #4 apply to the PEIR/PEIS for the LARRMP.

1. It was stated in the PEIR/PEIS that “site-specific biological surveys would likely need to be conducted” as specific projects are undertaken. We believe that biological surveys should have been conducted as a part of this EIR/EIS process. The whole purpose and intent of requiring an EIR/EIS is to determine the environmental impacts or the existing conditions. That cannot be accomplished without knowing what those existing conditions are.

   It was also stated that high and potentially significant impacts could occur due to river channel modifications where there is existing high quality habitat (i.e. in the Sepulveda Basin and from Griffith Park to the Taylor Yard). However, these general comments have no value unless they are supported by data.

2. Alternative CC-8 includes an island with passive recreation (hiking and bird watching). As an organization that is well known for its involvement in hiking and bird watching, we still would prefer to have all human recreation on this island prohibited. This is the only location on the entire length of the river that has the potential to be developed as an undisturbed breeding island for riparian dependent birds.

O-14-1: Comment acknowledged. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies are expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on biological resources in a particular project area.

O-14-2: Comment acknowledged.
Comments

3. Section 3.7.1.2 under “Birds” states: “The diversity and species richness along the river corridor in the LARRMP area is minimal.” That is so wrong! Attached is a list of 225 species of birds that have been seen in the Sepulveda Basin alone during the last 20 years, and on any given day I could easily locate 60 to 75 species. The Sepulveda Basin is one of the premier birding spots in Los Angeles County due to extensive habitat restoration and the extensive use of native plants. Many of these birds use the River as a corridor and utilize the small pockets of vegetation, and the waterway itself, during their travels.

4. Section 3.7.1.3 under “Species of Special Concern” states: There are no known federal or state listed threatened or endangered species within the 32 mile LARRMP study area. Furthermore, none are expected to be encountered.” How can you make that statement when no site-specific biological surveys were conducted? In fact, Bird Species of Special Concern can be expected to be encountered along the river almost any day of the year and include: American White Pelican, Double Crested Cormorant, Osprey, Northern Harrier, Sharp-shinned Hawk, Coopers Hawk, Merlin, California Gull, Vaux’s Swift, Loggerhead Shrike, Yellow Warbler, Yellow-breasted Chat, and Tri-colored Blackbird. Rarely seen species also observed along the upper stretches of the river include: Least Bittern, White-faced Ibis, Golden Eagle, Prairie Falcon, Long-billed Curlew, Burrowing Owl, Vermillion Flycatcher, California Horned Lark, and Summer Tanager.

Responses

O-14-3: Comment acknowledged. We concur regarding the Sepulveda Basin diversity. The language in the paragraph titled: Birds in Section 3.7.1.2 will be modified to reflect this. Your list of species seen in the Sepulveda Basin will be included in the Final PEIR/PEIS as part of your comment letter, which is now part of the public record for the project.

O-14-4: Comment acknowledged. We concur. We will change language in the first sentence of Section 3.7.1.3 of the Final PEIR/PEIS to read, “In general, the 32 mile stretch of the River in Los Angeles impacts very few federal- or state-listed endangered or threatened species. The U.S. Fish and Wildlife Service records indicate that Sepulveda Basin is a suitable habitat for the endangered least Bell’s vireo (Vireo bellii pusillus). All future specific projects within the River Corridor at the Sepulveda Basin would assess impacts on this species. It will also be determined on a project basis if similar assessments would be required at other locations within the River Corridor.”
<table>
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<tr>
<td>Thank you for your attention to these details and for your continued work on this most excellent project.</td>
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<tr>
<td>Sincerely,</td>
</tr>
<tr>
<td>Kris Ohlenkamp</td>
</tr>
<tr>
<td>President – SFVAS</td>
</tr>
<tr>
<td>2367 Old Topanga Canyon Road</td>
</tr>
<tr>
<td>Topanga, CA 90290</td>
</tr>
<tr>
<td>(818) 225-8348</td>
</tr>
<tr>
<td><a href="mailto:Kris.ohlenkamp@sbcolglobal.net">Kris.ohlenkamp@sbcolglobal.net</a></td>
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<p>| Responses |</p>
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<tr>
<th>Letter O-15</th>
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<tbody>
<tr>
<td><strong>From:</strong></td>
<td><a href="mailto:environmentalrep@stnc.org">environmentalrep@stnc.org</a></td>
<td>O-15-1: Comment acknowledged. The LARRMP discourages an increase of impervious surfaces within the vicinity of the River because these hardscapes exacerbate the conveyance of contaminated urban runoff into the River channel. Where possible, the Plan encourages the use of permeable surfaces to facilitate the capture, retention, and treatment of urban runoff. See, for instance, Plan Recommendations 4.3 to 4.5.</td>
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<tr>
<td><strong>To:</strong></td>
<td><a href="mailto:engrpeirs@lacity.org">engrpeirs@lacity.org</a></td>
<td><strong>O-15-2:</strong> This comment was discussed with the LARRMP team and the City of Los Angeles BOE. The LARRMP is intended to be compatible with the County of Los Angeles Landscaping Guidelines and Plant Palette’s; see, for instance, Chapter 5’s discussion of the planned River Greenway.</td>
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<td><strong>Date:</strong></td>
<td>Fri, Feb 9, 2007 5:54 PM</td>
<td><strong>Subject:</strong> LA River RMP Site - Comment on EIR/EIS</td>
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<td><strong>Subject:</strong></td>
<td>LA River RMP DEIR/DEIS</td>
<td><strong>Comment Type:</strong> Comment on EIR/EIS</td>
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**Comment:**

**O-15-1**

Does the river master plan address the city’s continued permitting the conversion of natural areas to impervious surfaces throughout the watershed? Until it does, the root cause of the catastrophic flooding from runoff can only get worse.

City must adopt the county’s policies and:

Establish a network of native plant rescue nurseries specifically designed to collect and propagate those local plants that are now lost to grading and development, and to preserve their unique genetic attributes.
Letter O-16

Comments

O-16-1: The LARRMP stresses the importance of River-adjacent open space, and acknowledges this development, which is the subject EIR for the Valleyheart Senior Center project. Preservation of as much open space (preferably closest to the River) as possible and maintenance of public access to the River and its planned future amenities would be compatible with the LARRMP. The Valleyheart Senior Center Project EIR is under review by City staff and we have conveyed our comments, and the concerns of stakeholders who have already contacted us, to the Planning Department, which is the lead on this project.

March 18, 2007

Carol S. Armstrong, Ph. D.
Bureau of Engineering-Department of Public Works
City of Los Angeles
1140 S. Broadway, Suite 600-Mail Stop 933
Los Angeles, CA 90015-2205

Re: Los Angeles River Revitalization Master Plan
Draft PEIR/PEIS Public Hearing

Dear Ms. Armstrong:

On behalf of the Studio City Residents Association (SCRA), which consists of more than 2,100 member households in the community, I provide the following comments for the above referenced project.

Recently in our community, a development proposal was filed with the City for the project Valleyheart Senior Community (the Project), on what is now the site of Studio City Golf and Tennis. This is a 16-acre parcel, privately owned, which includes a recreational facility consisting of a 9-hole golf course, driving range, putting green, 16 tennis courts, and a clubhouse. The Recreational Facilities include numerous mature trees, providing rare “green space” in the otherwise heavily developed San Fernando Valley. The property is strategically located on the Los Angeles River, and its critical location is a key connection in the regional network of parks, trails and natural lands that comprise the 51-mile Los Angeles River Greenway.

This 16 acre parcel is the last unprotected open space between Canoga Park and the 170 freeway. It is a critical connection node along the planned pedestrian and bicycle trails for the L.A. River. It is also of critical importance to the river and river trails because it is the only location where a public access and staging area for could be easily developed.

This site could also be used to help address serious water pollution in the L.A. River by being improved to help filter and clean polluted dry weather and storm water runoff before it reaches the river.

O-16-1: The LARRMP stresses the importance of River-adjacent open space, and acknowledges this development, which is the subject EIR for the Valleyheart Senior Center project. Preservation of as much open space (preferably closest to the River) as possible and maintenance of public access to the River and its planned future amenities would be compatible with the LARRMP. The Valleyheart Senior Center Project EIR is under review by City staff and we have conveyed our comments, and the concerns of stakeholders who have already contacted us, to the Planning Department, which is the lead on this project.
Comments

All or a portion these 16 acres could be restored to natural riparian habitat, one of the few places along the entire 51-mile L.A. River where this is possible.

Because of its value as one of the few remaining open space areas in the San Fernando Valley, and as the last remaining unprotected, undeveloped open space along the Los Angeles River from Canoga Park to the 170 freeway, special care must be taken to ensure all potentially significant impacts of the project are properly studied in the LRMP PEIR/PEIS and fully mitigated. The value of this property’s location on the Los Angeles River and its role as a key trail connector and public access point for the River Greenway must be analyzed and if feasible, be adopted.

Thank you for your consideration. We request to be placed on the mailing list for any future notices and documents.

Sincerely,

Art Howard
President
Studio City Residents Association
Letter O-17

Comments  March 27, 2007

Carol Armstrong, LARRMP Project Manager
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

Dear Ms. Armstrong,

I have read your letter and would like to acknowledge your comments. The LARRMP is a complex plan that requires careful consideration of various factors, including the preservation of green infrastructure.

Your comments were discussed with the LARRMP planning team. The overriding concern about the LARRMP not being a watershed-oriented plan relates to the original scope as proposed by the Los Angeles City Council. The scope of the LARRMP relates to the River Corridor, defined at approximately ½-mile on each side of the River and expanded at specific locations such as the Opportunity Areas. Nevertheless, there are valid issues in this letter that are either already addressed in the LARRMP, or that could be expanded.

(1) The specific volume of water that could be saved, recharged, and reused within the River Corridor is a study unto itself, and was not done for the following reasons: As mentioned in the letter, it’s more of a watershed-wide issue that needs a watershed-wide analysis. Projects within the River Corridor could not begin to provide the storage and infiltration of the rainfall volume moving to the ocean. Instead, the Plan seeks to use areas along the channel as demonstrations of what could be done outside of the study area, similar to what is being pursued by the IRP, the IRWMP, the Tujunga Wash study, the Sun Valley WMP, etc. As found on Page 3-9, [recommendations that have been made include]... “reduce and reuse stormwater runoff from developed areas. Both the Integrated Resources Plan (IRP) and the IRWMP call for a reduction and reuse of stormwater runoff volumes through onsite measures, such as reducing impervious surfaces, or using BMP’s to capture, treat, and infiltrate storm runoff. Performance targets vary, from a goal of reducing runoff by 50 percent (IRP) to reducing and reusing up to 90 percent of storm runoff from developed areas (IRWMP).”

(2) Without an overall study that, again, is watershed-based, it is impossible to estimate the amount of water that could be captured and it’s associated value. Further, within the River Corridor, the use of the open space and park areas proposed—as either recreation, habitat, or water quality—would need to...
O-17-1 (cont.): be decided before estimates of the water supply potential could be made. Still, the point of the comment is valid in trying to identify potential water supply benefits. In light of the above response, the Plan will be augmented with information that will aid decisions for water supply features.

The following text has been incorporated into Chapter 4 of the LARRMP 4:

“The Plan proposes a comprehensive system of water quality treatment facilities that include regional treatment, in-channel treatment, and on-site controls to deal with both runoff reduction and water quality treatment. In this regard, proposals are consistent with the Integrated Resources Plan, the Integrated Regional Water Management Plan, the City’s Stormwater Management Plan (currently underway), and is intended to be consistent with future City efforts at developing sub-area “loadings” of pollutants flowing to the River.

General locations for regional and in-channel treatment are specified, and illustrated sizing criteria and performance for in-channel treatment terraces have been evaluated to assess the feasibility of the concept. The in-channel water quality “treatment terraces” would be constructed above the elevation of a 50-year flood to minimize anticipated maintenance. The 50-year flood standard is viewed as a comparatively rare event that represents an acceptable level of maintenance risk from washout. While treatment within the channel does not provide credit toward Total maximum daily Load (TMDL) requirements, this Plan recommends that the City work with the Regional Water Quality Control Board to change this policy so that in-channel treatment could satisfy TMDL compliance requirements in the future.

A logical next step as the Plan moves forward into implementation is to develop specific pollutant removal targets for each type of constituent considered, and to develop removal goals for each geographic reach and for each scale of treatment.
O-17-1 (cont.): This must, of necessity, be coordinated among all of the planning efforts listed above, so that each effort reinforces the other.

Moreover, because many of these plans deal with treatment upstream in the watershed, either along a tributary or at a private, on-site location, performance goals need to be established that take this into consideration. This would entail defining treatment areas within the watershed at a level of specificity that was beyond the scope of this Plan. However, it is a very important “next step” in the development of an integrated, watershed-wide stormwater strategy. As noted repeatedly, the River cannot and should not be expected to be the treatment location “of last resort” for stormwater runoff originating elsewhere in the watershed.

An integrated approach to developing runoff reduction and water quality treatment goals would also be helpful in attempting to quantify benefits associated with conservation and groundwater recharge within the watershed. Captured and conserved, that water would have tremendous value for augmenting the region’s water supply. It is possible that the system-wide deployment of these projects could generate for other required water infrastructure systems enough local water value and savings to finance a major portion of this Plan’s implementation.”
O-17-2: Comment acknowledged.

O-17-3: Comment acknowledged.

O-17-4: Comment acknowledged.

O-17-5: The LARRMP incorporates by reference and tiers off the Integrated Resources Plan (IRP) project approved by the City in 2006. In addition, it incorporates and cites the County’s Integrated Regional Water Management Plan (IRWMP). The approved IRP envisions management of up to 42 percent of the dry weather and 47 percent of the wet weather urban runoff generated by the City. These measures include in-cistern on public properties (e.g., schools), on-site wet weather runoff treatment and percolation on public properties (e.g., parks), diversion of up to 160 million gallons per day (mgd) of urban runoff into Urban Runoff Plants throughout the City. Additionally, TMDL Implementation Plans will address River water quality issues. The point made here is well taken in the sense that the nexus of all of these measures to land use and River-related projects will link these watershed related issues to the LARRMP and thus help finance such projects.

Also see response to Comment O-17-1.
Comments

TreePeople Comments: Los Angeles River Revitalization Master Plan
March 27, 2007
Page 3

the goals of many of the city’s and region’s water-related plans (IP, IRWMP, etc.). If the River Revitalization Plan were to integrate with, support and mandate adoption of these other efforts, it could become the catalyst and significant partner for constructing the watershed-wide system of capture and conservation projects. It is possible that the system-wide deployment of these projects could generate for other required water infrastructure systems enough local water value and savings to finance a major portion of the River Plan’s implementation. This is yet another integration node that must be addressed and evaluated as part of this plan’s EIR.

Opportunities from integration and emerging new priorities in the era of climate change

As described in one example above, the City of Los Angeles and this River Revitalization Plan can be the catalysts needed for implementing shared projects outside the river corridor, projects that are essential to the Revitalization’s success. Actively identifying these projects and integrating their planning with other agencies may make the difference in LA’s ability to compete for bond funds for all the projects. Nearly all the bonds require integrated planning efforts and truly multipurpose projects. Funding agencies have become quite sophisticated in separating programs that result from truly integrated processes from those that only claim to be integrated. The state’s bonding capacity is nearly consumed for the next 20 years because of the last round of infrastructure bonds. It’s critical that Los Angeles be as competitive as possible to access these funds for the river.

An integrated River Revitalization Plan implementation is directly linked to other critical needs and priorities for the mayor and the city. One example of a truly multiple-benefit, integrated approach would be developing “watershed parks” to green and study campuses and protect students at most of LA’s schools. Using the watershed demonstrations at Broadways and Open Charter Elementary Schools as models, these watershed park/play yards would provide part of the watershed’s water retention, conservation and pollution prevention services, while protecting student health, greening underserved neighborhoods, saving energy for air conditioning, and meeting the mayor’s call for establishing a park within walking distance of every child in Los Angeles.

Climate-change mitigation

As the city begins mobilizing every department to develop aggressive plans to address climate change, river revitalization gains even more impetus. Pumping water into Los Angeles is the single largest use of electricity in the state. Capturing and conserving the rainfall throughout the watershed could replace up to half of the water Los Angeles imports. Achieving a 50% reduction in water importation would produce a substantial benefit in climate-change mitigation. Once again, a fully-defined River Revitalization Plan must trigger these projects and has the integrated jurisdictional impact to do so.

Responses

O-17-6: Comment acknowledged.

O-17-7: Comment acknowledged.

O-17-8: Comment acknowledged.
Conclusion

The Los Angeles River Revitalization Plan contains a very hopeful and powerful vision. For that vision to be realized, the city must provide leadership and connect the river plan with other citywide and regional water and greening efforts. Although the current version of the river plan is critically deficient on these approaches and pathways to implementation, it’s not too late to address the issues before the plan is finalized.

The city has demonstrated its capacity to conduct efficient and effective integrated planning with the recently completed, and award-winning, Integrated Resources Plan. If necessary, there are significant partners, such as the Metropolitan Water District and the Los Angeles County Public Works Watershed Management Division, who have both the jurisdictional mandate and resources to help complete an integration-nodes element of the Revitalization Plan. We strongly urge the city to take this important step to ensure the plan meets its promise and potential.

TreePeople stands ready to provide guidance to the city in the integration process. We look forward to hearing from you with questions to clarify these comments. We’re happy to help provide answers.

Thank you for your consideration.

Sincerely,

[Signature]

Andy Lipkis
President
Letter O-18

Comments

February 27, 2007

Members of the L.A. City Council’s Ad Hoc River Committee
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012

Re: Questions about Los Angeles River Revitalization Plan

Dear Honorable City Councilmembers:

O-18-1: On behalf of the Valley Industry & Commerce Association (VICA), I am writing to share some initial observations and raise questions about the Los Angeles River revitalization plan from some of our members. First, let me say that—like a whole—the revitalization plan represents a unique opportunity to beautify our city and add recreation spaces. VICA appreciates your interest in some viewpoints expressed by our members, including:

1. There are thousands of jobs and millions of tax revenues generated by businesses along the L.A. River, particularly in areas that are zoned for industrial use. Is there any economic data on the impact of jobs if the plan is not currently proposed?

2. Most of the Valley’s L.A. River corridor appears to be along residential communities including apartments and single-family housing units. What will be the impact on housing prices and at what cost to the city to obtain those homes?

3. Why will the thousands of homes that are part of the L.A. River beds? Will the increased demand along the river increase the numbers of transients who normally reside in city parks?

4. It appears that the goals for open space exceed the boundaries of the flood zones—to what extent and how much does this add to the cost of the project?

5. In the Valley, there are a number of vacant parcels along the river corridor that are currently zoned for redevelopment; how will the river plan impact these important projects?

6. The overall goal to revitalize the river is impressive and ambitious. Is there scientific evidence to support the hydrology infrastructure needed to implement this vision?

7. There are some tracks of land along the river’s Valley portion that are already recreational such as in Studio City and Griffith Park; does it make more sense to concentrate on those areas instead of spending money to displace residents, homeowners, and businesses?

VICA appreciates your consideration of these thoughts. In the near future, VICA will formally appear on the L.A. River revitalization plan. In the meantime, we kindly ask that you keep an open mind to all stakeholders involved in this process as well as keeping in mind the unintended consequences of any decisions that may eventually impact jobs and our business climate. Thank you for your attention.

Sincerely,

Graham L. Huffman
President

5121 Van Nuys Blvd, Suite 203, Sherman Oaks, CA 91403
Tel. 818.817-0645 Fax 818.907-7034 info@vica.com

Responses

O-18-1: Comment acknowledged. Your comments have been discussed with the LARRMP planning team.

O-18-2: The LARRMP is a vision document that suggests how River-adjacent change might take place in response to River improvements. To that end, future job figures are approximated in relation to those that may result from the potential investments proposed within the vicinity of four of the Opportunity Areas (See LARRMP Chapter 7.). The LARRMP does not propose definitive changes to existing jobs and businesses; such decisions would involve the City’s prevailing community planning process, which is discussed in Chapter 8 of the LARRMP. Issues central to implementation of the Plan, such as job and housing impacts are discussed in LARRMP Chapter 10.

O-18-3: The LARRMP does not advocate the taking of homes and businesses—it is a vision document that suggests how River-adjacent change might take place in response to River improvements. Impacts to housing in specific locations cannot be determined at this time, but will be addressed in a comprehensive, open, and transparent process—through the City’s community planning process and through subsequent project-level environmental analyses. The LARRMP recognizes the need to update existing Community Plans in River-adjacent areas through an extensive and inclusive community involvement process. (See Chapter 8 of the LARRMP.) That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder-driven process that is best suited to gauge community support. The LARRMP is intended to result in an equitable distribution of benefits and supports the retention and strengthening of stable residential areas, balancing these aims with a long-term program to acquire properties for flood protection and River improvements. All measures, including inclusionary zoning, equitable distribution of
O-18-3 (cont.): benefits, and rent and job stabilization strategies, would be available to the community as they take part in developing their Community Plan revisions. The LARRMP does not suggest the net removal of any housing, but recognizes that should a decision be made to do this in the future, it should include proper compensation—such as through a voluntary buy-back program, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles Housing Authority.

Moreover, no eminent domain would be used without triggering the California Environmental Quality Act. This means that the public will have full knowledge and opportunity to comment on any future project component that involves eminent domain. Both the RIO district creation and the Community Plan revisions will ensure future stakeholder input per City of Los Angeles procedures and policies.

O-18-4: Comment acknowledged. Issues such as impacts to homeless persons living within the River area are related to governance and management of the River Corridor and are intended to be addressed through implementation of the LARRMP’s recommended 3-tiered governance structure. The new structure is intended to improve collaboration across jurisdictions and result in public service delivery improvements, including the issues of maintenance, public access, and safety.

O-18-5: To achieve meaningful open space development, LARRMP projects will likely extend beyond the River right-of-way because more land may become available that is suitable for open space use. The Plan’s concepts illustrate what this might look like in the future; however, any and all parcels that might be acquired for open space (or any future LARRMP use) would be subject to project-level analysis. Since the Plan does not provide any definitive decisions regarding future land acquisition for open space creation, no reliable cost information can be discussed. However, the LARRMP does include rough cost range estimates for potential future projects in the
O-18-5 (cont.) : final draft (See Chapter 10).

O-18-6: Comment acknowledged. A variety of public and private sector projects may already be in development or planned for development along the River Corridor. The LARRMP, should it be adopted, intends to facilitate improved communications with River-adjacent developers so that future projects will be compatible with the LARRMP’s goals and objectives. The River Improvement Overlay (RIO) district is one example of how compatibility with the LARRMP can be encouraged—such as through guidelines for landscaping, building-orientation, and water conservation practices. See Chapters 8 and 10 of the LARRMP for details concerning the RIO and its implementation.

O-18-7: Please see responses to L-5-4 and L-5-8, above.

O-18-8: Comment acknowledged. We concur that it is advisable to work to prioritize the preservation, enhancement, and expansion of existing green and open space resources. The LARRMP does recommend providing access to all residents within the River Corridor by providing new open space and recreational facilities in locations where they currently do not exist. The Plan is a vision document and does not advocate the displacement of residents and businesses. Such decisions would be made on a project-by-project basis and be subject to further environmental review and public involvement. See, e.g., the discussions regarding community planning (in LARRMP Chapter 8) and implementation (in LARRMP Chapter 10).

O-18-9: Comment acknowledged. Your comment has been passed on to the LARRMP planning team.
INDIVIDUALS COMMENTS
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<td><strong>I-1-1:</strong> In the Final PEIR/PEIS, specific language from your comment will be added to Section 4.4.8 (Mitigation Actions and Best Management Practices) regarding soils, and to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor.</td>
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**Comment:**

In the Canoga Park area of your revitalization, please have DTSC, DHS, and EPA check the soils and water for dioxins before you develop.
I-2-1: Comment acknowledged. This comment was discussed with the LARRMP team and the City of Los Angeles BOE. The LARRMP discusses the Arroyo Seco Confluence as one of its Opportunity Areas in Chapter 6. Although it is not one of the five major opportunity areas, the connections between the Arroyo Seco and the Los Angeles River Corridor are recognized as having the potential for expanded development of recreation and ecological revitalization. The City would welcome project proposals from local stakeholders and adjacent interested communities involving including the Arroyo Seco in the future implementation of the LARRMP.
I-3-1: Comment acknowledged.

I-3-2: The LARRMP addresses safety through a variety of means. As it discusses the possibility of increased risk of drowning, there are many ways with which this could be minimized and avoided. Sirens, electronic alarm systems and billboards, as used with Rio Besos in Barcelona, Spain, would be one option. In addition to its environmental improvements, the Plan proposes educational enhancement and recreational benefits—each would provide local youth with opportunities that are currently scarce in river communities.

I-3-3: The project area has already experienced increases in land prices, which has put a strain on the affordable housing and small business sectors. The Plan recognizes the need to update existing Community Plans in river-adjacent areas through an extensive and inclusive community involvement process. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suitable to gauge community support. An overall goal of the Plan is to encourage the retention and strengthening of stable residential areas, and to balance these with a long-term program to acquire properties for flood protection and River modifications. All measures, including inclusionary zoning, equitable distribution of benefits, rent and job stabilization, would be available to the community as they take part in their community planning processes and in the evaluation of specific projects.
I-4-1: The LARRMP stresses the importance of this river-adjacent open space, and acknowledges this development, which is the subject EIR for the Valleyheart Senior Center project. Preservation of as much open space (preferably closest to the River) as possible and maintenance of public access to the River and its planned future amenities would be compatible with the LARRMP. The Valleyheart Senior Center Project EIR is under review by City staff and we have conveyed our comments, and concerns of stakeholders who have already contacted us to the Planning Department, which is the lead on this project.
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<tr>
<td>In my opinion, this proposed freeway project will have a negative impact on the proposed Valleyheart Senior Community, which has damaging impact on the LA River.</td>
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Thank you for your consideration. Please keep me on mailing list for future notices.

Sincerely,

[Address and contact information]

| Responses |
I-5-1: Comment acknowledged.

I-5-2: The LARRMP PEIR/S incorporates the Integrated Resources Plan (IRP) project approved by the Los Angeles City Council in 2006 by reference. The IRP advocated, in addition to upgrading the water and wastewater treatment plants, the reuse of up to 53,000 acre-feet per year of recycled water for non-potable use, and management of 42 percent of the City’s dry weather and 47 percent of the wet weather urban runoff. The net effect of all these projects would be to reduce contamination and prevent further degradation of the watershed. The LARRMP is designed to support these upstream efforts.

I-5-3: Comment acknowledged. The River Improvement Overlay (RIO) is intended to provide similar guidelines.

I-5-4: Comment acknowledged. By definition, the LARRMP proposes modifications beyond the river channel.

I-5-5: Comment acknowledged. The LARRMP discusses the community planning process in Chapter 8.

I-5-6: Comment acknowledged.

I-5-7: Comment acknowledged.

Urban stream restoration not just ecological restoration is more the proper category.
Public Comments and Responses

Comments

1-5-8: Channel modifications should be addressed under the umbrella of Flood Control.

1-5-9: Comment acknowledged. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies can be expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on particular resource areas. All future, site-specific projects will have their own environmental review, public outreach and decision making phases where specific physical modifications would be examined and analyzed in detail.

1-5-10: Open space development is, again, secondary to the River itself, but should complement the River planning in issues of watershed, water quality, wildlife and habitat, public health and public safety.

1-5-11: Comment acknowledged. “Multi-purpose revitalization,” whether in the Opportunity Areas or along the River Corridor, refers to the several uses upon which the participating public has provided input. These do not just include opportunities for economic development, but also water quality, habitat restoration, recreation, and open space. The LARRMP was developed through a thorough public review and participation-driven process.

1-5-12: “Improved natural habitat” indicates the Plan’s intention to increase or expand areas of existing, identified habitat so that these may attract a greater number and variety of species and begin to form more substantial habitats that can be linked within and outside the River Corridor. Natural habitat elements will be incorporated into greenways, parks, wetlands, buffer strips, etc. Synthetic turf is not proposed for use in any of the park areas proposed in the Plan. All landscaped areas will conform to the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes (January 2004), which requires the use of native, drought-tolerant plants that provide habitat for indigenous wildlife and avifauna.

Responses

1-5-9: Comment acknowledged. It is important to reiterate that this PEIR/PEIS is programmatic, and evaluates “concept-level” planning in the LARRMP, based on available information. No resource-specific surveys or studies have been undertaken for this programmatic PEIR/PEIS, and these types of studies can be expected to accompany project-level environmental analyses that will be required under CEQA and NEPA. It is anticipated that individual project-specific studies, surveys and evaluations will determine the significance of impacts on particular resource areas. All future, site-specific projects will have their own environmental review, public outreach and decision making phases where specific physical modifications would be examined and analyzed in detail.

1-5-10: Comment acknowledged.

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1-5-12: “Improved natural habitat” indicates the Plan’s intention to increase or expand areas of existing, identified habitat so that these may attract a greater number and variety of species and begin to form more substantial habitats that can be linked within and outside the River Corridor. Natural habitat elements will be incorporated into greenways, parks, wetlands, buffer strips, etc. Synthetic turf is not proposed for use in any of the park areas proposed in the Plan. All landscaped areas will conform to the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes (January 2004), which requires the use of native, drought-tolerant plants that provide habitat for indigenous wildlife and avifauna.
I-5-13: “Economic values” refers to the recognition that the proposed greening improvements in and near the River channel will also catalyze additional economic investments in River-adjacent communities.

I-5-14: Comment acknowledged. A variety of private sector projects may already be in development or planned for development along the River Corridor. The LARRMP, should it be adopted, intends to facilitate improved communications with River-adjacent developers so that future projects will be compatible with the LARRMP’s goals and objectives.

I-5-15: Comment acknowledged. Any proposed improvements to the channel will require maintaining or enhancing existing flood control capacity, as described on page 4-7 of the Master Plan.

I-5-16: Comment acknowledged. Please refer to pages 4-18 through 4-21 of the Master Plan.

I-5-17: Comment acknowledged. Each of these must be addressed in concert because of the impacts one has upon the others. Public access to the River is not incompatible with achieving water quality, flood control, and public safety objectives. To address public safety considerations, a variety of measures will be employed, including ramps and steps to provide easy egress from the channel, signage, warning sirens, and fencing, as described on page 4-15 of the Master Plan.
I-5-18: “Economic Growth” is discussed in the LARRMP’s Chapter 7, which outlines the potential economic effects of revitalization — defined as increased revenues (e.g., job creation, wages earned, and tax revenues) that would be generated by a sequence of activities. Chapter 7 also analyzed potential revenue generated from land development strategies. And there are also economic returns from water quality improvements, habitat improvements, recreational amenities, and open-space aesthetics.

I-5-19: Comment acknowledged and discussed with LARRMP planning team. The LARRMP represents a vision for change, improvement, restoration, and other transformative activities. In the context of habitat preservation, there is currently little habitat to preserve within the River Corridor, but we concur that where it does exist and when it does exist in the future, preservation should be an overt priority.

I-5-20: Comment acknowledged, and was discussed with the LARRMP planning team. Many of these aspects (e.g., “prevent harm or damage to persons….control of erosion, the control and elimination of exotic species, prescribed burning, fuel hazard reduction”) fall within City, County, or Resource Agency standards for project implementation and would naturally be part of any future design of individual projects.

I-5-21: Comment acknowledged. Many of these aspects (e.g., “prevent harm or damage to persons….control of erosion, the control and elimination of exotic species, prescribed burning, fuel hazard reduction”) fall within City, County, or Resource Agency standards for project implementation and would naturally be part of any future design of individual projects.

I-5-22: The River Management structure will involve public input and review. It is intended to be a transparent process and would not contradict any prevailing laws and policies regarding public involvement.
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<td>I-5-23: All of these agencies have been and will continue to be consulted as the LARRMP is implemented.</td>
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<td>I-5-24: Please refer to pages 4-18 through 4-21 of the Master Plan.</td>
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<td>I-5-25: Yes. Please refer to responses above regarding land use planning issues. Additionally, water management programs and projects are covered in the previously cited IRP EIR and the IRWMP.</td>
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<td>I-5-26: Please note response to preceding comment. Environmental justice and community impacts were discussed in the above referenced documents. The LARRMP is intended to result in an equitable distribution of River improvements. Continued coordination with the applicable agencies and organizations throughout the watershed is expected to result in both water supply and water quality equity.</td>
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<td>I-5-27: These issues are part of the mandate for the Joint Powers Authority that is recommended as one part of the 3-tiered governance structure of the LARRMP. The governance structure is intended to result in public service delivery improvements, such as those regarding access, maintenance, and public safety.</td>
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<td>I-5-28: Comment acknowledged.</td>
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<td>I-5-29: Comment acknowledged. Any proposed improvements to the River channel must maintain existing flood control capacity, as indicated on pages 4-7 and 4-8 of the Master Plan.</td>
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<td>I-5-30: Comment acknowledged. These types of detailed information will be generated at the time projects are proposed for implementing the LARRMP.</td>
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I-5-31: Comment acknowledged. The City has established policies on emergency preparedness and response; the LARRMP is not intended to contradict these. The Plan’s recommended 3-tiered governance structure would provide oversight regarding this issue and each project would be subjected to an analysis of impacts to this issue during its CEQA compliance evaluation.

I-5-32: Comment acknowledged. Any future LARRMP projects with groundwater impacts—including infiltration and storage—will be coordinated with applicable agencies and jurisdictions. For instance, the City’s Department of Water and Power was involved in the LARRMP from the beginning.

I-5-33: The Santa Monica Mountains Conservancy was consulted in developing the LARRMP.
I-5-34: Comment acknowledged. The organizations consulted in the planning process do not comprise an exhaustive list. The implementation of LARRMP projects can certainly involve the Rivers and Mountains Conservancy.

I-5-35: Comment acknowledged. The organizations consulted in the planning process do not comprise an exhaustive list. The implementation of LARRMP projects can certainly involve the University of California Natural Reserve System.

I-5-36: Comment acknowledged. We have added a paragraph describing the NCCP to Section 4.7.1.1.

I-5-37: This subject was covered in the previously cited IRP project which involved consultation with the Department of Health Services.

I-5-38: Comment acknowledged. The LARRMP will not contradict prevailing emergency response plans.

I-5-39: Comment acknowledged. The LARRMP, if adopted, would be implemented in a manner that adheres to the City’s prevailing policies regarding performance measurement and recordkeeping.

I-5-40: Comment acknowledged. The LARRMP, if adopted, would be implemented in a manner that adheres to the prevailing, applicable local, regional, state, and federal laws.

I-5-41: Comment acknowledged. Community awareness of the River and pride in it are understood to be fundamental to the River’s environmental health because informed and engaged residents that understand the River’s environmental importance would be more likely to prioritize the protection and preservation of its environmental integrity.

I-5-42: Comment acknowledged. Each of these—the watershed, water quality, and water supply—may be linked to open space development even though not explicitly included in this passage. The use of “includes” is intended to infer that other possibilities exist.
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<td>I-5-43: Comment acknowledged. Viability and sustainability within the River Corridor is intended to imply consideration of water impacts since the River is the central resource addressed in the LARRMP. Also, please refer to the previously cited IRP EIR and the IRWMP. Additionally, the City’s Bureau of Sanitation’s Watershed Management Division is preparing TMDL implementation plans to meet the requirements and regulations of the Regional Water Quality Control Board.</td>
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<td>I-5-44: Comment acknowledged. Please see response directly above and refer to Chapter 5 of the LARRMP regarding particular water quality-related recommendations. Performance measurements to ascertain the success levels of these recommendations in implementation would be developed on a project-by-project basis using relevant local data, including hazardous and toxic materials and sites data.</td>
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<td>I-5-45: Several BMPs are identified in Chapters 4 and 5 of the LARRMP, including water quality wetlands, treatment terraces, permeable pavement, biofiltration infiltration strips, and even sustainable construction practices. Costs for various project features are shown in the tables in Chapter 10 of the LARRMP.</td>
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<td>I-5-46: Comment acknowledged. The California High-Speed Rail project will be evaluating a variety of extension alignment alternatives in the environmental review process of its three main proposed extensions. These processes are beginning in Spring 2007; City staff will coordinate with High Speed Rail representatives on future implementation issues within the River Corridor.</td>
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<td>I-5-47: Comment acknowledged. No definitive decisions have been made regarding the composition of participation in the LARRMP-recommended governance structure. These decisions will be made subsequent to Plan adoption.</td>
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I-5-47 (cont.): The new governance structure would adhere to all applicable laws of the involved jurisdictions and is intended to result in better coordinated, improved public service delivery within the River Corridor.

I-5-48: Comment acknowledged.

I-5-49: Comment acknowledged. The proposals of the LARRMP are intended to result in a transparent and accountable governance structure that will improve public service delivery within the River Corridor without contradicting the City Charter or State and Federal Constitutions.

I-5-50: Comment acknowledged. No definitive decisions have been made regarding the composition of the proposed River Foundation or its financing. The Foundation is intended to be a philanthropic organization that will focus both public and private sector attention on issues of concern within the River Corridor.

I-5-51: Comment acknowledged.
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<tr>
<td>I-5-52: Since the “Foundation” has no boundaries, do you propose that “private individuals” and “private funding” come from foreign sources?</td>
<td>I-5-52: Comment acknowledged. See response to I-5-50 above.</td>
</tr>
<tr>
<td>River Improvement Overlay (RIO) District</td>
<td>I-5-53: Comment acknowledged.</td>
</tr>
<tr>
<td>I-5-53: The summary reads:</td>
<td>I-5-54: Comment acknowledged. The LARRMP-proposed RIO would be implemented in accordance with existing community planning procedures and would be overseen by the City Planning Department.</td>
</tr>
<tr>
<td>The RIO District would provide design standards and guidelines for all new development, private development projects and public facilities, as well as arterial and collector streets that connect to the river within this district. The district boundary would typically include 300 feet on either side of the river, but in some locations the boundary would extend to areas where future revitalization opportunities have already been identified, such as the compliance with the RIO District design standards and guidelines would be determined by a Department of City Planning design review process for private development projects. Topics to be addressed in the review process include landscaping, stormwater management, building orientation, view corridors, paseos, exterior lighting, green building technology, setbacks, and signage. Design standards and guidelines for public facilities and public ways would emphasize water quality, pedestrian, bicycle, and equestrian connections to and across the river, landscape character, public parks and open space, compatible public utility easements, building location and orientation, directional and interpretive signs, and public art.</td>
<td>I-5-55: Comment acknowledged.</td>
</tr>
<tr>
<td>I-5-54: Future Specific Plans</td>
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<tr>
<td>The summary reads:</td>
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<tr>
<td>For future specific plans for lands near the river, planning guidelines would be proposed covering topics such as site plans, landscaping, site lighting, building orientation, building setbacks, building density, parking lot lighting, green architecture, and signage. Although future implementation tools, such as specific plans and rezoning may take place within the boundaries of the RIO District, the integrity and function of the RIO District is anticipated to be maintained.</td>
<td></td>
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<tr>
<td>This clause is obviously there to supersede any General Plan or Community Plan amendments by a blank smearing definition of a specific area undefined by a voter district.</td>
<td></td>
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<tr>
<td>Potential Impacts and Mitigation</td>
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<tr>
<td>The summary reads:</td>
<td></td>
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<td>The conclusions present in this PEIR/PEDS are based on a programmatic-level evaluation of potential impacts from future LARRMP implementation projects. There could be potentially significant adverse impacts from certain aspects of air quality, water quality, biological resources, land use, noise, public health and safety, transportation, socioeconomic resources, environmental justice, and cultural resources. Furthermore, impacts from the remaining six environmental resource areas (agricultural resources; geology, soils, and seismic hazards; mineral resources; recreation; utilities and infrastructure, and aesthetic resources) are not likely to be significant. Beneficial impacts are expected from certain aspects of air quality, water quality, biological resources, recreation, and aesthetic resources.</td>
<td></td>
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</table>
I-5-55

THE IMPACTS ARE FLAWED AND SIGNIFICANTLY UNDERESTIMATED IN EVERY WAY ON EVERY CATEGORY. THE FLOODPLAINS SHOULD BE BASED ON 100 YEARS AND NOT 50 YEARS. THERE ARE NO INDICATIONS OF TRIBUTARY FLOWS INTO THE RIVER AND THEIR IMPACT. DEATHS AND PROPERTY DAMAGE CAN BE ANTICIPATED WITH THIS PLAN. COSTS ATTRIBUTED TO A DISASTER AND THE AFTERMATH COULD REACH IN THE TRILIONS. THAT IS A SIGNIFICANT ADVERSE IMPACT.

The obvious goal of this plan is land use. And with that, the LARRMP is a plan for disaster and excess housing development in hazardous and contaminated land with disregard for water and watershed issues including flood control, water quality and water supply. No consideration is given to those disadvantaged communities other than to use their status to further enhance the wealth of those who know how to work the system of “public benefit” for personal gain.

I-5-56

All potential impacts are significant adverse impacts.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

I-5-57

I-5-56: Comment acknowledged.

I-5-57: Comment acknowledged.

Looking for earth-friendly autos?
Browse Top Cars by "Green Rating" at Yahoo! Autos' Green Center.
http://autos.yahoo.com/green_center/
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<th>Letter I-6</th>
<th>Comments</th>
<th>Responses</th>
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</table>

I-6-1: Comment acknowledged. Designs of rubber dams that may be proposed as elements of future LARRMP projects will be evaluated for the impacts mentioned in your comment. It is envisioned that existing flow would be maintained once the ponded water reached design depth, so that a steady-state inflow-outflow takes place (minus evaporation that would increase due to the increased surface area). The rubber dams discussed in the LARRMP are envisioned to have intermittent use, so that the water elevations behind the dams are maintained for aesthetics and recreation when water quality improvements allow their prudent use. The water is not intended to be stagnant, but rather would have continuous albeit slow flow. This, and other means of mosquito control (ability to raise, lower, or eliminate the water levels, and providing maintenance activities such as vegetation control and potential, controlled use of larvicides), are effectively used in wetlands across the region. Additional design details will be identified during later phases addressing energy, costs, monitoring, and the potential for the dams to assist in meeting sediment and trash TMDL’s, through negotiation with the State Regional Water Quality Control Board related to in-channel restrictions. As a riparian corridor is developed within the channel bottom, the continued use of rubber dams or other temporary ponding devices would be evaluated for their effect on habitat quality, and where necessary to support habitat goals, these devices would be discontinued.
I-7-1: The LARRMP does not promote narrowing of streets, increasing traffic on overburdened infrastructure, and increasing density. As noted in the previous response, there is going to be project-by-project study, evaluation, mitigation, and public participation efforts as each future site-specific project gets implemented. As for land use, zoning, and density related issues, please see the response to Comment O-11-1.

I-7-2: The LARRMP recognizes the need to update existing Community Plans in river-adjacent areas through an extensive and inclusive community involvement process. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to land use changes, such as zoning modifications, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suited to gauge community support. The overall policy of this plan is to encourage the retention and strengthening of stable residential areas, and to balance these with a long-term program to acquire properties for flood protection and River improvement. All measures, including inclusionary zoning, equitable distribution of benefits, and rent and job stabilization strategies, would be available to the community as they take part in developing their community plan revisions. The Plan does not advocate net removal of any affordable housing without proper compensation, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles Housing Authority.

No eminent domain will be used without triggering the California Environmental Quality Act in subsequent phases of this project. This means that the public will have full knowledge and opportunity to comment on any future project component that involves eminent domain. Both the RIO District creation and the community plan revisions will ensure future stakeholder input per City of Los Angeles procedures and policies.
I-18-2 (cont.): Lastly, the LARRMP’s proposed 3-tiered governance structure is expected to result in public service delivery improvements regarding the issues you have raised.

Comments

I-18-2

A couple of years ago, while searching for an armed suspect in the intersection of the 2 & 5 Freeways, my LAPD SLO described a network of tunnels carved into the brush leading to rooms also carved from the brush where there were many homeless encampments. You can expect more homeless encampments like this along the river-adjacent freeways in the future if you don’t have a plan for dealing with the homeless as you push them out of the river. The freeways are not a good place for homeless to live.

The PER did not even address the economic impacts of the River Master Plan in the Taylor Yard Study Area – an area which already has a huge homeless population. The PER did not even address the true cost of relocating the homeless and cleaning up their encampments. CD13 did a pilot program involving many different agencies to relocate the homeless from the riverbed and clean up trash in the fall of 2006. Perhaps you should check with Mitch O’Farrell in CD13 for a cost estimate on this program for just a one-mile stretch of the river.

The PER only glosses over the homeless issue. Clearly it is a major issue in the Taylor Yard Study Area; it must be elsewhere along the river too.

I feel the PER should be reassessed for the economic and public safety effects of the homeless issue as well as it more clearly stated that individual project specific EIRs be done for any street widening or zone changes, not just an Initial Study Checklist.

To keep the homeless encampments from overwhelming the neighborhood, they’ve told us about the self-segregation of the homeless according to the types of drugs they’re addicted to. We see a lot of methamphetamine-addicted homeless in this corridor.

On occasions when CD13 and/or LAPD along with appropriate agencies have moved homeless encampments from the river or the freeways, we see an immediate increase in the homeless population in the neighborhoods from Atwater, to Silver Lake and Elysian Valley.

Prior to one such homeless relocation, 3-day notice was given to the encampments on a 1-mile stretch of the river to move or they would be assisted in moving. CD13 admirably coordinated a multi-agency effort to move the homeless from the riverbed prior to an upcoming storm.

Unfortunately, an unintended consequence was the influx of homeless searching for new places to live. I actually called my LAPD SLO wondering if they had cleared out an encampment. We had noticed a lot of new faces, not just the regulars digging through the trash that week. I received a panicked call from a neighbor when a mentally unstable homeless woman climbed her front stairs, entered her fenced yard, climbed more stairs to reach the front door, where she knocked incessantly, insisting she was there for her massage. The homeless woman then proceeded to disrobe and continued knocking and yelling. This went on for more than a half hour, meanwhile my neighbor was unable to leave for work because the homeless woman refused to leave the yard. While the LAPD eventually arrived, they somehow did not see the woman’s behavior as a danger to herself and just told the homeless woman to leave the street.

Clearly, the homeless problem is complex and involves a more than just the encampments on the river. However, the PER fails to even address, let alone adequately mitigate for economic nor public safety impacts on public agencies, nor to the neighborhoods which will bear the brunt of the homeless population shift.

Property values will decrease in these already marginal neighborhoods adjacent to freeways and secondary highways. People will become ever more hostile toward the homeless as they see more of them in the neighborhood.

Public health and safety also becomes an issue, since it is not unusual to find discarded syringes on Riverside Drive now. The lack of bathroom facilities, along with the mentally unstable homeless, dumping and motor homes, has turned Riverside Drive into a disgusting and potentially dangerous place to walk.

As more homeless move out of the river and into the thick brush along the 2 and the 5 Freeways we will see more brush fires and potential deadly accidents when the homeless are struck by cars. Both of these things happen every year in the area around the Glendale Narrows section of the river. We always have a few brush fires caused by campfires each year. We’ve been fortunate they haven’t happened when the Santa Ana Winds have been up or we’d have a major disaster.

Responses

I-7-2 (cont.): Lastly, the LARRMP’s proposed 3-tiered governance structure is expected to result in public service delivery improvements regarding the issues you have raised.
<table>
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<tr>
<th>Comments</th>
<th>Responses</th>
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</table>
| Diane Edwardson  
2630 Corralitas Drive  
Los Angeles CA 90039  
323-666-1392 | |
Letter I-8

Comments

I-8-1: Comment acknowledged.

Responses

I wish to submit the following comments on the Draft PEIR/PEIS:

[Text of comments]

I attended the following Public Hearing (check one):

☐ Saturday, February 24, 2007
☐ Tuesday, February 27, 2007
☐ Wednesday, February 28, 2007

Please use the back of this form if you need additional space for your comments.

Optional Information:

Name/Nombre: \[Signature\]
Affiliation/Affiliación: [Institution]
Address/Domicilio: [Address]
Email/Correo Electrónico: [Email]

Your comments may be handed in at the sign-in table or mailed to:

Carol S. Armstrong, Ph.D.
Bureau of Engineering – Department of Public Works
City of Los Angeles
1149 S. Broadway, Suite 920 • Mail Stop 928 • Los Angeles, CA 90015-2205

Or posted online at: www.lacitynet.org under the "Los Angeles River Revitalization Master Plan" link.
I-9-1 Comment acknowledged. The LARRMP stresses the importance of River-adjacent open space and acknowledges this development, which is the subject of an EIR for the Valleyheart Senior Center project. Preservation of as much open space (preferably closest to the River) as possible, and maintenance of public access to the River and its planned future amenities would be compatible with the LARRMP. City staff are reviewing the Valleyheart Senior Center Project EIR, and we have conveyed our comments and concerns of stakeholders who have already contacted us to the Planning Department, which is the lead on this project.

I-9-1

Please study the effects on the River Plan that the development proposal for the property adjacent to the River near the cross streets Ventura and Whitsett in Studio City (now Studio City Golf & Tennis) would have. This is currently private property zoned A-1, but the owners want to secure a zone change in order to be able to build a massive development that could block opportunities for the LARRMP, including river access.

Please include me on any future communications about this project.

Thank you for your consideration.

Sincerely,
Kathy Hassett
4211 Teesdale Avenue
Studio City, CA 91604
khassettla@aol.com
I-10-1: The Community Plan update process, which will follow the adoption of this plan, will enable assessment of impacts on zoning modifications, gentrification, and preservation of community standards in terms of land use issues and community stability and makeup. This is a stakeholder driven process that is best suited to gauge community support. The overall policy of this plan is to encourage retaining and strengthening stable residential areas, and balance these with a long-term program to acquire properties for flood protection and River improvement. All measures, including mixed use zoning, inclusionary zoning, and development guidelines, would be evaluated as the community takes part in developing Community Plan revisions. Special provisions for environmentally-sensitive measures (such as availability and use of reclaimed water) would also be evaluated at that time as part of the effort to establish River Improvement Overlay district.
I-10-I

**Comments**

Organic living: How do we make this a river again?

Make sure the whole zoning along the entire extent of the river area allows for the greatest possible opportunities for mixed use!

City of L.A. should have a zone called "River Mixed Use Zone". This would allow for possible housing, retail, commercial and industrial areas. This zone would allow for special elements to be integrated into the architecture of the zone. This zone should be implemented carefully.

We should also make sure that green technologies are integrated into the planning.

**Responses**

Dear [Author],

Thank you for your comments regarding the "River Mixed Use Zone". We appreciate your suggestions for integrating green technologies and special elements into the architecture of the zone.

The City of L.A. is committed to promoting sustainable practices and opportunities for mixed use development. Your input is valuable in shaping our future planning and zoning strategies.

Sincerely,

[Your Name]
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<th>Letter I-11</th>
<th>Comments</th>
<th>Responses</th>
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<td>&gt;&gt;&gt; &quot;David Hill&quot; <a href="mailto:abissinia@earthlink.net">abissinia@earthlink.net</a> 3/9/2007 10:14 PM &gt;&gt;&gt; Carol,</td>
<td>I-11-1: Comment acknowledged.</td>
</tr>
<tr>
<td></td>
<td>Thank you for your call, your time and attention today.</td>
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<tr>
<td>I-11-1</td>
<td>I have lived near and with the LA River for 63 years now as did my father and his father before him. I heard many stories about the big floods in the valley in the 1930's, before the cement was poured, when it was mostly agricultural land. The worst flood my father told me was so bad that the railroad tracks in the middle of the valley were under 6 ft of water and all roads to the rest (north) of California were closed for over a week. My first memory of the Sepulveda basin and dam were as a child in 1949 when my father took me there to fly his model airplane. We went almost every Sunday and there were always dozens of cars and families out to watch and participate. The basin at that time was the property of the Army Core of</td>
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I-11-1

Engineers and it included an active Nike missile site if I remember correctly. I still look back at the first remote controlled model aircraft event I attended with my father sometime in the early 1950's. It was such a spectacle that thousands of people came to watch the controlled models that were using guidance systems nearly as sophisticated as the guided missiles with miniature tubes like the first TV's had!

The basin was not yet connected to Parks and Recreation and the US government actively supported model aviation and realized (as did the Soviet Union at the time) that it was a great way to foster interest in and develop the talent for the technology and science that had historically made the US both economically and militarily strong. The spirit of Thomas Edison, the Wright Brothers and individual discovery and achievement was still incredibly strong in Southern California before network television major league baseball, football, soccer etc arrived. The sacrifices of WWII were still in everyone's consciousness.

The Sepulveda Basin today has developed into one of the most heavily used recreational parcels in all of the City of LA. With the exception of Whittier Narrows Park it is unique in that it will never be developed because of its potential for flooding during the occasional historic flood. It is no coincidence that these two parks are the only remaining public venues where the independent aviation enthusiast can still try out his or her dreams with powered model aircraft. 50 years ago there were literally hundreds of sites for a population a fraction the size of the 10 million or so residents that the parks serve today. These parks are irreplaceable in a metropolis where a half a square mile or more is required for the peace and tranquility of surrounding neighborhoods. The model aviation fields today live in relative harmony with joggers, bicyclists, golfers, baseball and soccer players who came decades later after Parks and Recreation took over management from the Army Corp in the Basin. There are multitudes of public baseball and soccer fields in every community of greater LA that are only used evenings and weekends and sit virtually empty all day long from Monday to Friday, Whittier Narrows Park in particular. The Apollo Field on the other hand is well attended and usually crowded 365 days a year from dawn to dusk by model aviation enthusiasts. When it is raining there are frequently people sitting in their cars waiting for it to stop. I have been one of several on many occasions.

The reason for my concern regarding the revitalization plan is I feel we cannot afford to let it infringe on a public resource like a model flying field which, on the verge of extinction, could be threatened by a plan that proposes non emergency flooding of the Sepulveda Basin.

I-11-2

I used to play along the LA River often as a child in the Griffith park section and realize the huge potential benefit of a well executed plan, but I cannot emphasize enough how strongly I feel about the necessity to preserve an irreplaceable resource like Apollo Field in the Basin. It is not a glamorous cause in the touchy-feely media world of today but it is certainly one that comes from the roots and from the hearts of the people who made LA one of the most prosperous cities on earth. Northrop, Douglas, Hughes, North American, Lockheed, and Rocket Dyna provided employment for a large percentage of Angelinos, who had the best standard of living in the world after WWII. I personally met and was inspired by executives, scientists and chief engineers from these companies who would regularly show up at the 'flying field' as opposed to the golf course. This was the place.
<table>
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<th>Comments</th>
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<td>I-11-3</td>
<td>to be noticed by your peers. Of course here I am now a retired scientist and engineer looking back at the things I valued along the way and hope they will be available to or even appreciated by those to come.</td>
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<td>Letter I-12</td>
<td>Comments</td>
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<tr>
<td>I-12-1</td>
<td>Comment acknowledged. Please see the responses to Comments O-1-1 to O-1-26.</td>
</tr>
<tr>
<td>I-12-2</td>
<td>Comment acknowledged. Many of these issues are related to governance and management of the river corridor and are intended to be addressed through implementation of the LARRMP’s recommended 3-tiered governance structure.</td>
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<tr>
<td>I-12-3</td>
<td>Comment acknowledged. We concur. Art, culture, and programs for youth are recommended components of the LARRMP and such works would be overseen through implementation of the Los Angeles River Foundation, should the Plan be adopted and its recommended management structure implemented.</td>
</tr>
<tr>
<td>I-12-4</td>
<td>Comment acknowledged.</td>
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</table>
I-12-5: Comment acknowledged.

I-12-6: The LARRMP project area has already experienced increases in land prices and a strain on the affordable housing and small business sectors. The Plan recognizes the need to update existing Community Plans in River-adjacent areas through an extensive and inclusive community involvement process. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to land use changes, gentrification, and preservation of community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suited to gauge community support. The overall policy of this plan is to encourage the retention and strengthening of stable residential areas, and balance these with a long-term program to acquire properties for flood protection and river improvements. All measures, including inclusionary zoning, equitable distribution of benefits, and rent and job stabilization strategies, would be available to the community as they take part in developing their Community Plan revisions. The Plan does not advocate net removal of any affordable housing without proper compensation, replacement, and if necessary, relocation assistance/compensation within the neighborhood per the policies of the City of Los Angeles Housing Authority.
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<th>Comments</th>
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<tr>
<td>I-12-7: Comment acknowledged. See previous response.</td>
<td>I-12-8: Comment acknowledged. Changes have been incorporated into applicable LARRMP and PEIR/PEIS figures.</td>
</tr>
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<tr>
<th>Economic development</th>
<th>The LARRMP and EIR can be more explicit in identifying economic threats and recommending provisions in favor of job creation, hiring locals, job training, etc. Gentrification is directly linked to affordable housing (above) but also in a significant way to accessible job opportunities.</th>
</tr>
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</table>
| I-12-7               | Recommend the creation of provisions that mandate a percentage of local jobs to be allocated to local people, with appropriate wages and benefits, etc.  
- Learn from “best practices” elsewhere, e.g., consult with SAJE how they have done it with the Staples Center and LA Live!  
- Job provision for locals may require a task force or monitoring mechanism of the kind recommended for affordable housing (above). The two may be tied under the heading of gentrification.  
- Monitor industrial land use conversion with the goal of preserving and increasing jobs and job quality (in terms of earnings, benefits, environmental job conditions, etc.). |

| Graphic renderings | Renderings are prescriptive: they tell how a place looks like and what it is (or should be) used for. Renderings are also often times the only type of narrative that the public relates to when they want to learn about the LARRMP or any other plan. This includes the ones that do not read English and the many that do not read plans, and the LARRMP in Renderings in the LARRMP should be more diverse and more culturally and environmentally sensitive. They also should explicitly state that they are only for illustrative purposes. I found the pictures included in the draft deceiving in three ways:  
- Because of the (lack of) representation of people and activities. |

F-171
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<th>Comments</th>
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<td>I-12-8: Comment acknowledged.</td>
<td>I-12-9: The LARRMP is a document of the City of Los Angeles that makes recommendations across a broad spectrum of revitalization options. The Plan precedes the U.S. Army Corps of Engineers Feasibility Study because it represents the City’s recommendations. Next, the Corps will be conducting hydrology and hydraulics modeling to ensure that flood management capacity is enhanced and not diminished through the implementation of any LARRMP project involving channel modification. Additionally, any River-related project that intends to use federal funding is subject to the National Environmental Policy Act provisions that are within the purview of the U.S. Army Corps of Engineers. In-channel vegetation may increase the “roughness” of the river flow and hence change the requirements of food management. For projects that are clearly within the City’s purview, such as creation of parks, paseos, land use change, development guidelines, and others that do not require federal funding, the U.S. Army Corps will not be involved (except on issues—as stated above—related flood management). Other comment acknowledged.</td>
</tr>
<tr>
<td>I-12-9: The LARRMP is only in English.</td>
<td>I-12-10: Comment acknowledged.</td>
</tr>
<tr>
<td>I-12-11: Comment acknowledged.</td>
<td>I-12-11: Comment acknowledged.</td>
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<tr>
<td>I-12-12: Comment acknowledged.</td>
<td>I-12-12: Comment acknowledged.</td>
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<td>Comments</td>
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<td>complexity and interconnectedness of issues of the LARRMP would have been better served by a planning coordination, rather than an engineering one. Planners are trained to plan, to facilitate public participation, and to coordinate multidisciplinary teams.</td>
<td>beginning!) and conduction of participatory aspects of decision-making processes. - Let planners lead (and support them in) the development of the RIO and community plans.</td>
</tr>
<tr>
<td>Environmental justice The LARRMP should be an instrument that helps us redress some environmental injustices in L.A.</td>
<td>- The goal of a more equitable city should be explicit in the vision and many of the recommendations of the LARRMP and the EIR, particularly the related to social and economic issues.</td>
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My comments benefit from what I have learned from many people involved in the LARRMP planning process, including people in your team. I am particularly thankful to Siri Eggebraten and Joe Linton for their generous insights.

As we are all interested in a revitalization of the LA River that best serve the interest of all Angelinos, I trust you will continue to do your best to provide sensitive responses to all the concerns and recommendations gathered from the public, including my own.

Please let me know if there are other ways in which I can be of assistance in this process.

Sincerely yours,

Clara Irazabal  
Assistant Professor  
School of Policy, Planning, and Development  
University of Southern California  
650 Childs Way, RGL 226  
Los Angeles, California 90089-0626  
Tel: (213)740-0548; Fax: (213)740-0001  
E-mail: irrazabal@usc.edu
I-13-1: Comment acknowledged. The LARRMP recommends development of a River Arts program along with long-term integration of the arts and culture in the development of Plan projects. Your continued involvement in this process is encouraged.
Comments

In Denver they put an amusement park downtown in the river bed, why can't we build a giant water wheel on the river with a real line connector or an aerial skybus. An aerial gondola system connecting the river park to Dodger stadium, connecting Chinatown, El Vielle, Little Tokyo, Arts District.

Call Mr. 213-508-3738

The Kerns
I wanted to make you aware of a community member I met at a presentation (her name is Bonnie Kea). She had great concerns in regards to the water quality coming from the Boeing plant in the San Fernando Valley. She mentioned that she would bring many people to the next valley workshop to express their concerns. She feels it would be unsafe for anyone to be exposed to waters that would flow from this site to the River. Here is an article on the issue:

Boeing contests water rule
BY ERIC LEACH, Staff Writer

The Boeing Co. has filed a lawsuit challenging pollution limits set by the state for storm water that flows from its Santa Susana Field Lab into the Los Angeles River and the Arroyo Seco.
Boeing asked the state Water Resources Control Board last month to reconsider the limits, which company officials maintain are illegal, according to the suit.
Because water board officials said they could not hear the case until at least May, Boeing filed the petition Wednesday in Los Angeles County Superior Court to protect its options, spokeswoman Blythe Jameson said.
"We are working with the regional board to develop a compliance plan for storm-water discharges and a realistic schedule for implementing those limits," Jameson said. "Boeing contends many of the permit limits are not appropriate for storm-water discharges."

William Rukeyser, a board spokesman, said the agency's decision had been carefully researched.
"We're totally confident any challenges will be unsuccessful," he said. "We're proud of the role the state water board plays in protecting human health and we recognize the importance of the successful Santa Susana cleanup to the people in the area and the environment of California."
Located in the hills between the San Fernando and Simi valleys, the Santa Susana Field Lab was used for decades for rocket-engine testing and nuclear research. Cleanup operations of nuclear and chemical contamination are under way.
The state issued Boeing a water quality permit in 2004, and tightened restrictions in 2006.
State officials said the lab had violated provisions of the 2004 permit more than 100 times, with higher-than-allowed levels of mercury, dioxins and other contaminants.
But Boeing said many of those violations were from naturally occurring levels of heavy metals and chemicals in the soil, as well as residue from the 2005 Topanga Fire that burned more than two-thirds of the 2,800-acre hilltop site.
Jameson said to prevent runoff from the fire residue alone, Boeing has spent more than $1 million to remove 900 tons of ash and install barriers to prevent sediment from running off the site.
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<th>Letter I-15</th>
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<tr>
<td>I-15-1 Comment acknowledged. Because this is a programmatic level analysis, because the document was available for public review for more than 50 days, because specific concerns may be adequately addressed in future project-level analyses, and because changes made in the Final PEIR/S provide clarification of key issues raised, the review period will not be extended. CEQA does not require additional review at the Final EIR stage. The 45-day public review period is a CEQA requirement for the draft document. We have already exceeded that requirement.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

>>> robert leyland <roberleyland@yahoo.com> 3/26/2007 4:02 PM >>>

Dear Ms. Armstrong,

Thank you for providing me with a copy of the above document during our meeting of March 1, 2007.

DEADLINE: I was informed, when we met on the above date, that the deadline had been extended to March 26, 2007, for submission of comments for the written record. In turn, I recommended that it be again be extended to allow for a reasonable amount of time to review both the LARRMP and the Draft PEIR/PEDS, rather than the standard 30 days. I suggest that the deadline for acceptance of written comments be extended another 45 days.

Such an extension would allow me to submit additional comments in an effort to highlight the inadequacies of subject document, which are considerable and significant. Rushing the review only creates the perception that the lead agency is attempting to limit the exposure of the inadequacies of the Draft EIR/PEDS as well as the catastrophic environmental impact of the project being promoted through the LARRMP.

COMMENTS:

As mentioned in the response, “TreePeople #1,” the original scope of the Plan as proposed by the Los Angeles City Council defined the River Corridor at approximately ½-mile on each side of the channel. It is therefore not the appropriate vehicle for establishing land use management policy throughout the watershed.

The idea of the River as an Urban Wildlife Refuge has been proposed by the Santa Monica Mountains Conservancy and is considered compatible with the LARRMP, as was mentioned in the Plan on page 4-21.

I-15-3 Comment acknowledged. The idea of the River as an Urban Wildlife Refuge has been proposed by the Santa Monica Mountains Conservancy and is considered compatible with the LARRMP.

I-15-4 Comment acknowledged.


I-15-6 Comment acknowledged.
I-15-7 Comment acknowledged.

I-15-8 Comment acknowledged. These terms have been added to the Final PEIR/PEIS Glossary.

I-15-9 Please see response to Comment I-15-1.

I-15-10 Comment acknowledged.

I-15-11 Comment acknowledged.

I-15-12 Comment acknowledged. More detailed biological resource surveys are likely necessary as individual projects move forward and are subject to their own environmental analyses (e.g., CEQA and NEPA).
I wish to submit the following comments on the Draft PEIR/PEIS:
Deseo dar los siguientes comentarios sobre el PEIR/PEIS preliminar:

I attended the following Public Hearing (check one):
Yo asistí al siguiente taller (marque uno):

- [ ] Saturday, February 24, 2007
- [ ] Tuesday, February 27, 2007
- [ ] Wednesday, February 28, 2007

I was recruited by the Alliance de la Ríos del Río Mapocho
done a great job in organizing the community with the intent of maintaining
clean water and clean air improving the quality of life.
I am asking for the Master Plan Committee allow us to participate
in special projects, community service projects and volunteers work in the L.A.
River. Los Angeles county council has over 53,000 route paper to
start any

Optional Information:
Información opcional:
Name/Nombre:
Affiliation/Affiliación:
Address/Domicilio:
Email/Correo Electrónico:

Your comments may be handed in at the sign-in table or mailed to:
Sus comentarios pueden ser entregados en la mesa de registraciones o pueden enviarse por correo a:

Carol S. Armstrong, Ph.D.,
Bureau of Engineering - Department of Public Works
City of Los Angeles
1140 S. Broadway, Suite 600 • Mail Stop 939 • Los Angeles, CA 90015-2205

Or posted online at:
O enviado por internet a:

www.lariver.org under the “Los Angeles River Revitalization Master Plan” link.
Letter I-17

Comments

From: <mikeonsp@earthlink.net>  
To: <engrplan@acfits.org>  
Date: Tue, Feb 6, 2007 9:13 PM  
Subject: LA River RMP Site - Comment on Master Plan

Comment Type: Comment on Master Plan  
Subject: River Issues

Comment:
1. I have seen the river flow during storm events, I think it is faster than 30 FPS when over half full. Be VERY careful.
2. Transportation: you neglected the 8000 +/- daily Amtrak passengers who use the river corridor west bank tracks (in addition to Metrolink). The State has invested significant funds developing these passenger alternatives to highways, be sure they are preserved and enhanced.

Responses

I-17-1: See the PEIR/PEIS page 3-19, under Railroads, and, particularly, the discussion of the daily Amtrak passenger service and other commuter trains that use the Union Pacific lines. The PEIR/PEIS advocates consolidation of rail tracks, but does not make recommendations regarding changes to service delivery.
I-18-1: See response to Comment I-4-1.
All Cousins will only defeat the prime purpose of open space and restrict regional view of the area by increased traffic and pollution. The chief natural view of sight will be obstructed by four (4) and five (5) stories of buildings (4). The aforementioned parcel will not only help facilitate the implementation of a pedestrian and bicycle path, but will provide for underground water quality governance.

Thank you.

[Signature]

The I-18-1
<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
</table>

**Letter I-19**

**Comments**

**From:** bramirez@usc.edu  
**Sent:** Tuesday, March 27, 2007 5:31 PM  
**To:** engpeirs@lacity.org  
**Subject:** LA River RMP Site - Comment on EIR/EIS

**Comment Type:** Comment on EIR/EIS  
**Subject:** Test Gaine

**Comment:**
With every plan, no matter what type it is, there are good and bad aspects as well as room for improvement. The Los Angeles River revitalization master plan is a very thorough document to ensure the best for the communities and residents it will affect. There are many great opportunities the revitalization could bring; one of the goals that I believe will be a success is in greening the river and the neighborhoods. More and more people are becoming aware of the position we have placed ourselves in due to pollution and not using resources wisely; therefore, the greening of the river could greatly improve the current situation, people may become more aware of the environmental problems we are facing and that more green locations are needed. It will bring more people to the river and want to be there because it will seem as if you are not in Los Angeles because of all the green, bike lanes, and welcoming environment.

The issue that concerns me the most, and probably everybody else as well, is the fact that gentrification and displacement seem very likely. A lot of new things want to be added and it is going to cost a lot of money to recreate this river and location which will raise the cost of living in certain areas. Many of the residents along the river are low income families that will not be able to afford it once it is beautified. The revitalized river is supposed to be for the people but if some action, such as mandatory affordable housing or inclusionary zoning, is not taken into consideration then the current residents will not be able to enjoy it, thus defeating the original purpose of the LA River revitalization.
### Comments

<table>
<thead>
<tr>
<th>Letter I-20</th>
<th>Comments</th>
</tr>
</thead>
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<tr>
<td>I-20-1: This comment was discussed with the LARRMP team and the City of Los Angeles BOE. Chapter 2 of the PEIR/PEIS describes the array of river channel modifications and open space development measures comprising the implementation of the LARRMP. The PEIR/PEIS evaluated at a programmatic level the potential impacts associated with future LARRMP implementation projects that could involve these river channel modifications and open space developments within the River Corridor and the five opportunity areas. The PEIR/PEIS did not address water supply benefits, since an analysis of potential savings through detention and/or infiltration would be required on a project-specific level.</td>
<td></td>
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</tbody>
</table>

**From:** <redbecca74@gmail.com><br>**To:** engpeis@city.org<br>**Date:** Fri. Feb 9, 2007 9:40 AM<br>**Subject:** LA River RMP Site - Comment on EIR/EIS

**Comment Type:** Comment on EIR/EIS<br>**Subject:** Water Supply Benefits<br>**Comment:** Is there a part in the report that refers to water supply benefits?
Letter I-21

Comments

Carol Armstrong - Re: noise

From: susan ROCHA <susar52002@yahoo.com>
To: Carol Armstrong <Carol.Armstrong@lacity.org>
Date: Wed, Feb 7, 2007 10:23 PM
Subject: Re: noise

There is a school project going to be built along the river down San Fernando Road in Glendale Park. There is also a park about to open there. No one has mentioned how the train noise would impact a school or the park or nearby residents.

Susan

Carol Armstrong <Carol.Armstrong@lacity.org> wrote:

Dear Ms. Rocha:

Regarding your question about noise impacts of the Los Angeles River Revitalization Master Plan (LARRMP) project, as specific projects in particular locations along the River Corridor are identified during the implementation of the LARRMP over the next several decades, specific noise studies will be conducted as may be appropriate to those projects and locations, and specific mitigation/attenuation measures will be identified at that time. At the programmatic level of the current environmental document—the EIR/PEIS—since no specific projects are being evaluated at this time, specific noise studies and attenuation measures are considered premature.

Certainly the City would implement its environmental evaluations and project implementation—through construction and operation in accordance with the prevailing municipal code. I hope that you will stay involved in the LARRMP project to find out more about its progress and the implementation of future projects. In the meantime, please do not hesitate to contact me should you have any additional questions.

Best Regards,
Carol Armstrong

Responses

I-21-1: The school project and the park are also subject to environmental analyses as part of their CEQA compliance—during these processes, expected noise impacts must be discussed.
I-21-2: As specific projects in particular locations along the River Corridor are identified during the implementation of the LARRMP over the next several decades, specific noise studies will be conducted as may be appropriate to those projects and locations, and specific mitigation/attenuation measures will be identified at that time. At the programmatic level of the current environmental document—the PEIR/PEIS—since no specific projects are being evaluated at this time, specific noise studies and attenuation measures are considered premature. The City has indicated that it would implement its environmental evaluations and project implementation—through construction and operation in accordance with the prevailing municipal code.

Comments

E-Mail: Carol.Armstrong@actdy.org

“...are indeed compelling notions of restoration. But the river is 51 miles long—and lined with as much possibility as concrete.”

October 2, 2006

>>> susan ROCHA 2/4/2007 12:29 PM >>>

What is the city going to do about the train noise? Are they going to put up a sound wall? What about all other noise? Plane noise, boombox noise, muffler noise, etc. I am most concerned about amplified sound noise. See municipal code Chapter 11, Section 5, Article 115.003b. It lets churches have amplified sound noise as loud as they want whenever they want.

Please let me know what plans there are to keep the river a quiet and peaceful place.

Susan Roche

Responses

Food fight? Join in some healthy debate in the Yahoo! Answers Food & Drink Q&A.

Be a PS3 game guru. Get your game face on with the latest PS3 news and previews at Yahoo! Games.
I-22-1: This would be contrary to the goals and objectives of the LA River Revitalization Master Plan as stated on Page ES-2 of the Draft PEIR/PEIS.

Letter I-22

1. I read the L.A. Times article for 3/12/07 on the L.A. River & I immediately thought, what a great solution the L.A. River & All other rivers could be to the horrible L.A. Area Traffic.
2. Why couldn't the L.A. River & Others double up as traffic freeways?
3. They could be built designed by our Fantastic x Capable Civic Engineers to function as double as a freeway or a river. And, of course, designed not to be used when it rains or when water levels is too high.
4. Doubling our rivers as freeway would
   a. BE A LOT EASIER THAN BUILDING NEW ONES, although new ones can still be built & old ones repaired
   b. BE Tremendously Less Expensive (Save Billions)
5. Traffic solutions would be more immediate, flexible, effective, viable, practical, from many Viewpoints (economy, time, real estate, design, etc., etc.)
6. Would not displace people from their homes
7. Would help more traffic while other freeways are under construction & old ones repaired.
Comments

6. Special Entrances & Exits can easily be built to accommodate traffic & to be used only when safe to do so, as stipulated by law.

7. Beautiful Parks & Recreational Areas can still be built to beautify the areas in city.

8. Would bring a lot of smiles to millions of daily commuters.

9. These Rivers flow through the heart of every city & would facilitate traffic downtown as well on the outskirts.

10. Design, building a coast of the river/ways would not be in the way of traffic while coast would not cause any traffic jams.

11. Even if the areas could only be used intermittently or as an alternative — meaning — while other proper acceptable ways of moving traffic can be figured out, accepted & built, it would still be a great traffic solution.

Sincerely,

[Signature]

[Name]
[Address]
[City, State] [Zip Code]
<table>
<thead>
<tr>
<th>Letter I-23</th>
<th>Comments</th>
<th>Responses</th>
</tr>
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<tbody>
<tr>
<td>I-23-1</td>
<td>Comment acknowledged.</td>
<td></td>
</tr>
<tr>
<td>I-23-2</td>
<td>Comment acknowledged.</td>
<td></td>
</tr>
</tbody>
</table>
Letter I-24

Comments

I wish to submit the following comments on the Draft PERPES:

- The City of LA opened the river a few years ago and said "let all come" and became derelict in the City. Come to the LA River, Homeless, mentally ill, gangsters, graffiti vendors, dog owners, and on and on.

- When the City opened the river, they did as they always do: lock out a plan for security, maintain all the public things that had been done at taxpayer expense. They still have no plan, which the taxpayer funds to support. People live their lives in this area. Taxpayers, spend.

Optional Information:

Name: Tony Taylor
Affiliation: Unrepresented taxpayer/resident of the area
Address: 6751 Beverly Blvd #300
Email/Other Email: tonyt@lacity.org

Your comments may be handed in at the sign-in table or mailed to:

Carol S. Armstrong, Ph.D.
Bureau of Engineering – Department of Public Works
City of Los Angeles
1140 S. Broadway, Suite 600 • Mail Stop 929 • Los Angeles, CA 90015-2205

Or posted online at:

www.lacity.org under the “Los Angeles River Revitalization Master Plan” link.

Responses

Received at BOE on
March 3, 2009
Comments

I-24-1: Small fortunes to rescue homeless people in high waters, fever, fever scarcity, people over the river. The city is in need of flood control. It goes in one end and out the other.

I-24-2: But in all their wisdom, the city fathers & councils have wasted millions of taxpayer dollars on an unwashable, broken, and uselessles project. Now, they are trying to shore down the taxpayer trust.

Still no plans to take care of the project at the river. Still no plans to maintain anything. A really ridiculous plan to ease the taxpayer under the pretense of revitalizing the river.

What the Master Plan would be one where all there in competent, being with others and continuing down through all the city council.

When you do that Master Plan, I'll support it—until then, forget it.

Responses

I-24-1: Comment acknowledged.
I-24-2: Comment acknowledged.
I-25-1 Comment acknowledged.
<table>
<thead>
<tr>
<th>Letter I-26</th>
<th>Comments</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>From:</td>
<td><a href="mailto:williamprestonbowling@yahoo.com">williamprestonbowling@yahoo.com</a></td>
<td>I-26-1: In the Final PEIR/PEIS, specific language from your comment will be added to Section 4.5.8 (Mitigation Actions and Best Management Practices) regarding water quality, and to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor. The Canoga Park area will be included for example.</td>
</tr>
<tr>
<td>To:</td>
<td><a href="mailto:engrpeins@lacility.org">engrpeins@lacility.org</a></td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>Wed, Feb 28, 2007 8:49 AM</td>
<td></td>
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<tr>
<td>Subject:</td>
<td>LA River RMP Site - Comment on EIR/EIS</td>
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<tr>
<td>Comment Type:</td>
<td>Comment on EIR/EIS</td>
<td></td>
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<tr>
<td>Subject:</td>
<td>L.A. River Test For Toxins</td>
<td></td>
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<tr>
<td>Comment:</td>
<td>Before you re-vitalize the LA River please test the Canoga Park Area for Perchlorate, Tritium, TCE and other dioxins that may leach down from the Santa Susana Nuclear Laboratory that is at the headwaters of the LA River. Children should not be splashing around or catching fish with a cancer risk. DTSC, DHS &amp; EPA should all be notified, thank you.</td>
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<tr>
<td>Letter I-27</td>
<td>Comments</td>
<td>Responses</td>
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</table>
| **From:** Glen [glenw@dslextrue.com]  
**Sent:** Tuesday, March 13, 2007 4:18 PM  
**To:** engpeirs@lacity.org  
**Subject:** L.A. River Revitalization Master Plan  
From Glen Wilson personal comments only March 13, 2007  
I was only person who attended Public Hearing Feb 24, 2007 because the LA Daily News had a right up on it and the Neighborhood Councils where not e-mailed about it for NC s input!  
Northridge West Neighborhood Council  
glenw@dslextrue.com  
Enter to [www.lariver.org](http://www.lariver.org) or mail to  
Los Angeles River Revitalization Master Plan  
Carol S. Armstrong, Ph.D.  
Bureau of Engineering- Department of Public Works  
City of Los Angeles  
1149 S. Broadway, Suite 600 Mail Stop 939  
Los Angeles, CA 90015-2205  
I wish to submit the comments on the Draft PEIR/PEIS: | I-27-1 Comment acknowledged. |

| I-27-1 | The Los Angeles River Revitalization Master Plan is good in general but this will cost up to $5.7 Billion went the L.A. City is short of money all the time. We need the money for current problems now like tree trimming [was 7 years & now about 16 years to trim trees], potholes, sidewalks, resurface the streets, graffiti, street traffic, clean up (operation clean sweep), more police and L.A. City will have less money for 2007/2008! | I-27-2 Comment acknowledged. |

| I-27-2 | The problems with Los Angeles River Revitalization Master Plan is  
1) The High Cost of the Los Angeles River Revitalization Master Plan  
2) Will have more Gang and graffiti problems in Canoga Park and other areas  
(current not using some walk bridges over the river because of gangs in Canoga Park)  
3) Golf courses (problem with fertilizer and pesticides used)  
4) Public Health and Safety (pooled water, enter the River channel during flood stages leading to injury or drowning, fire hazard, trash etc.)  
5) Socioeconomic Conditions Public access to the river is good but not during the rains and bad on traffic with limited parking already before the Los Angeles River Revitalization Master Plan (With expansion of the River right-of-way may impact housing and employment due to displacement of existing uses; could displace existing business and result in lost jobs; could need more emergency medical services, police and fire protection; could induce a demand for new or altered government services)  
6) Transportation (long-term adverse impacts include increased Traffic and Parking demand due to more visitors to the areas, could impact arterial streets and railroads and high parking problems because of the right-of-ways of river for visitors, limited right-of-way [ROW] through residential neighborhoods and areas of industrial development) | I-27-3 Implementing the LARRMP is not expected to result in more gang and graffiti problems. Instead, proposed River improvements and enhanced oversight and coordination would be implemented through programs of the recommended three-tiered governance structure. This is expected to result in public service delivery improvements in public access, maintenance, and security. Thus, both the occurrence of graffiti and gang activity in the River Corridor are expected to decrease. |

| I-27-3 | | I-27-4 Comment acknowledged. |


| I-27-5 | | I-27-6 Comment acknowledged. Please see responses to Comments O-7-4 and I-26-3. |

<p>| I-27-6 | | I-27-7 Comment acknowledged. Transportation impacts would be addressed on a project-by-project basis through the subsequent environmental review (CEQA) processes. |</p>
<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>I-27-8</td>
<td>I-27-8 Comment acknowledged. Air quality and cultural resource impacts would be addressed on a project-by-project basis through the subsequent environmental review (CEQA) processes.</td>
</tr>
</tbody>
</table>

- Cultural Resources (Historic buildings and structures including bridges which may have went they do like excavation and grading, etc.) Noise fugitive dust emissions during construction.
<table>
<thead>
<tr>
<th>Letter I-28</th>
<th>Comments</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>I-28-1</td>
<td>Suggestion from Scott Wilson, NET, to address how we will recycle the concrete that we remove. (stacked concrete walls, etc.)</td>
<td>I-28-1 Comment acknowledged.</td>
</tr>
</tbody>
</table>

From: Renee Ellis [Renee.Ellis@lacity.org]
Sent: Wednesday, March 07, 2007 4:42 PM
To: Carol Armstrong
Cc: Artz, Iia
Subject: LARRMP Concrete Removal

Renee Ellis
Landscape Architect I
Bureau of Engineering/Architectural Division
213 485-4209
EIR/EIS Hearing Feb 24 2007 Hollenbeck A4457MOD.TXT

Los Angeles River
Revitalization Master Plan

Draft Programmatic Environmental Impact Report
Draft Programmatic Environmental Impact Statement
Public Hearing

Transcript of Proceedings
Hollenbeck Middle School
Boyle Heights, California
Saturday, February 24, 2007

Reported By:
Ruben Garcia
CSR No. 11305
Job No.: A4457MOD

Los Angeles River
Revitalization Master Plan

Draft Programmatic Environmental Impact Report
Draft Programmatic Environmental Impact Report

Page 1
Comments

EIR/EIS Hearing Feb 24 2007 Hollenbeck A4457MOD.TXT

IMPACT STATEMENT
PUBLIC HEARING

TRANSCRIPT OF PROCEEDINGS, taken at
Hollenbeck Middle School, 2510 East 6th Street,
Boyle Heights, California, commencing at
11:40 a.m., on Saturday, February 24, 2007,
reported by RUBEN GARCIA, CSR No. 11305,
a Certified Shorthand Reporter in and for
the State of California.

0003 APPEARANCES:
01 Staff:
02 Alex Watt
03 U.S. Army Corps of Engineers
04 Los Angeles District
05 David Broadfoot
06 Tetra Tech Consultant
07 Gary Moore
08 City of Los Angeles Department
09 of Public Works, Bureau of Engineering
10 Chris Robert
11 The Robert Group
12 Community Outreach
13 Ira Artz
14 Tetra Tech
15 Team Leader/Project Manager
16 Deborah Weinraub
Comments

Opening by Alex Watt
Presentation by David Broadfoot
Public Comments
Adjournment

Responses

INDEX

<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opening by Alex Watt</td>
<td>5</td>
</tr>
<tr>
<td>Presentation by David Broadfoot</td>
<td>5</td>
</tr>
<tr>
<td>Public Comments</td>
<td>13</td>
</tr>
<tr>
<td>Adjournment</td>
<td>53</td>
</tr>
</tbody>
</table>

E X H I B I T S

(None)
Boyle Heights, California, Saturday, February 24, 2007
11:40 a.m.

MR. WATT: Hello. My name is Alex Watt, U.S. Army Corps of Engineers, the Los Angeles District. We are involved with the Rio Salado project in Phoenix, the Tres Rios project in Phoenix, our Sacramento office has been involved with the Santa Cruz -- the Guadalupe River in San Jose, and with other projects here in Los Angeles. We are very happy to be involved as partners with the City of Los Angeles on this project, and we're really looking forward to having this come to fruition and getting plants in the ground, getting the bike paths in, and getting this to where we can enjoy the river and get the river back to where it used to be and still maintain the flood control that we need to protect your houses. So at this point I turn it over to David with Tetra Tech to do the presentation.

MR. BROADFOOT: Thanks, Alex. I am David, by the way. Glad to meet all of you. I'm going to talk really fast here. I was the leader of the group that did the Environmental Impact Report and Environmental Impact Statement, so there's about eight to ten of us who teamed up to do that. And we created this environmental document, which is a different document than the one that was just discussed. And this is the Environmental Impact Report and the Environmental Impact Statement.

And as Alex Watt just pointed out, the collaboration between the Army Corps and the City is really a good thing. And they're required to look at the environmental impacts associated with this kind of a concept plan that we're all considering for revitalizing. So that's what our task was.

I just wanted to point out that you don't have to speak your comments today. You can put them onto the comment card, comment forms that we have and give them in to us. You can send them in. You can go on line and you can give your comments that way. You can call up Carol Armstrong at the city and tell her what you think. So we have many ways that you can give your comments.

And we're in what we call the comment period right now, for the draft document has been done. We're asking the public now for your comments. So we want to give you the time to have the comments come in. So I'm not going to say that much. So I'm going to run through some slides real quick just so you have an idea.

There's three public hearings like this. This
As you know, the study area that we looked at goes from Canoga Park down to the City of Vernon area. Right through the City of L.A., in particular, we looked at the five opportunity sites that we have already talked about. We've concentrated and focused on those five. While I pointed out that there is a collaboration between the Army Corps and the City and makes it both -- we're complying with both the State regulations and the Federal regulations that way, which makes it nice. Our approach that we have taken here is that we have looked at about a half a mile on each side of the river for all of the 32 miles, and we have focused on the five opportunity areas. And what we have focused on is the environmental impacts that are associated with the measures and the features that have been talked about this morning. We have alternatives that have been established that have been mentioned for each of the five opportunity areas. And we have assessed the impacts that could be associated with projects that would be coming out. The challenge for us was that there's no projects at this point coming out, you know. It's just concepts. And so we stood back and said, "Okay, let's look at the river channel measures that could be changing in the river, and let's look at the opportunities for open space, all the parks and all the streets, the streets and green streets and that kind of thing." So we looked at all of those measures. And then we looked at alternatives at each of the five opportunity areas. And we looked at 16 environmental resources, which are listed here. We hope this is a comprehensive list. It's a list that we would approach every project with. And even though it's a concept level document that we are looking at with the Master Plan, we still asked ourselves what's going to go on if they go out and do something to the river channel, or what's going to go on if you put a park here or a ball field here or a walkway here, you know. What can happen to all of these resources? And so that's the kinds of questions that I was asking my team to answer. And so what we came up with is 10 of them -- there was 16 of them, and 10 of them have the potential to have some pretty significant impacts. And then we said, "Hey, we're going to raise the flag now because during the programmatic level of an E.I.A. -- we call it an Environmental Impact Report or Environmental Impact Statement, E.I.S. During the programmatic level now, is when the decision-makers and the City and the Corps can actually step back and make some changes perhaps and some decisions when we point out and raise the flags like we have in these ten areas."

So what are some of the impacts? And I won't go into the details here. But when all of the dust from the air quality can be an impact, there's some really nice, high quality biological resources, the Sepulveda area and so forth. Most of the river doesn't have great habitat, as you know. And that's the whole idea of the revitalization. Cultural resources. There are cultural...
resources along the river and those can be destroyed unless we pay attention to them.

Also, there's people, low-income families, you know, and people who are not as -- don't have the advantages that maybe some other people have that live in the area. And so there can be maybe some relocation that would have to be looked at and that kind of thing. So we looked at those kinds of things as potential impacts. We looked at potential for water quality. When they're constructing they create a lot of sediment, and it can create some water quality problems then. So we pointed those things out. We know that changing land uses, this was mentioned during the earlier discussion, that communities would have to be involved here because we're talking about maybe making some land use changes. So that's a big impact. And so we said, 'Hey, you better do something about that.' So that's what's built into the plan to involve the communities.

Also, noise issues. There's public health issues, you know, when you start pendiing up water, you possibly can get some more mosquitoes and that kind of thing. So all these things were looked at. The socioeconomic. Maybe some loss of jobs if you have to relocate. There's potential for that.

So we're saying that even though we're doing a programmatic approach here, we're saying that when a project comes up in the Boyle Heights area or any place along the river corridor, take a look at these things because we're saying these are potentially the areas that could have significant impacts. And so spend time looking at these things. Talk to the communities and so forth.

Transportation, as you know, is a big issue. And whenever you create places where people are going to bring their cars and so forth, you have problems with traffic. You have problems with parking and so forth. So these are issues that need to be addressed.

We also came up in our minds with some ways that we could approach not only construction, you know, because construction can have a big impact, but also in the operation of the new facilities that can have an impact as well. And we thought that there's a whole list of things that we can put forward in our document that can be used in the future project planning that could be reducing the impacts. And so that's what we call mitigation measures.

And our thinking is that with using these mitigation measures, it will probably likely reduce the impacts to less than significant. So we're really advocating that the city and the Corps and anybody who wants to do any of the projects for revitalization look at how to put these mitigations into effect.

Again, I won't go into the details because the important thing is to get your comments and I want to stop pretty soon here.

And we went through all through the ten ones that had significant impacts to show you some of the things that could be done.

Again, the process that we're in now is the public hearing process. It will go on until March 19th, when you have to have all your comments in by then. We'll incorporate all the comments into a final version of the
Comments

EIR/EIS Hearing Feb 24 2007 Hollenbeck A4457MOD

document and it will become available to the public.
Now I want to just throw a few ground rules out
for those who are going to come up and comment. We have
35 people that want to give a comment, and we had thought
that it would be about an hour for that comment period.
So that we’ve agreed about two minutes per person for your
comments. If you do it sooner than that, that’s great.
We’re going to go in the order roughly, or
whatever -- Chris is going to help you line up there.
It’s not that important, I guess. It’s just important
that you get a chance to -- so you can start coming up if
you want to, line up behind the microphone first or you
can stay where you are. It’s up to you. And then you can
come up when it’s time.
We have a court reporter. His name is Ruben
Garcia, and he’s a light heavyweight or he’s a lightweight
boxer. Anyway, he’s a court reporter also and he’s going
to be recording all of your comments, so that’s the
important thing here.
We want you to, when you give your comments,
you want to give your comments, please give your name and if
you want to give your location, you can say where you live
if you want. And if you are affiliated with an
organization, please tell us that too.
Let’s see what else we have here. We have a
timekeeper, and that’s Chris, she got a stopwatch and
so she’s going to raise a yellow card when you have thirty
seconds left. And then when she goes red, that means you
better stop.
Now, I’m personally making the general
assumption that you’ve read our document in some form. If
you haven’t, I’m not going to say that you can’t speak
because please come up and give a comment. It really is
important that we get your comments. This is what it’s
all about.
You will have about a month to read the document
if you haven’t done so yet, between now and when the
comment period closes. You can read it through and send
your comments in or put them online. Here’s where you
can send your comments to Carol. And that’s the address
or e-mail.
That’s it. So I’m going to turn the microphone
over to Alexia.
MS. TERAN: Thank you. This was a great
presentation. Thank you. And maybe some of what I’m
going to say might be a repetition, but since I haven’t
seen the answer up there, that’s what I’m going to repeat.
My name is Alexia Teran. I’m a board member of
the Greater Cypress Park Neighborhood Council. I’m the
Outreach Chair and Co-Chair of Education. I’m also a
member of the Cypress Park Women’s Association and the
president of the Friends of the Library. So all of this
interests me and interests my community.
One of the comments that I’m going to make is
that whatever they do with the river, even if it isn’t
everything that they plan, benefits everyone.

Responses

T-1-1: Comment acknowledged.
T-1-2: Comment acknowledged. Comment passed on to the LARRMP planning team.

T-1-3: Comment acknowledged.

T-1-4: Comment acknowledged. These features will be inherent elements of the implementation of future projects.

T-2-1: Comment acknowledged.

T-2-2: Comment acknowledged.

T-2-3: Comment acknowledged.

T-2-4: Comment acknowledged.

T-2-5: Comment acknowledged.
Comments

T-3-1: Comment acknowledged.

T-4-1: Comment acknowledged.

T-4-2: Comment acknowledged.

Responses

EIR/EIS Hearing Feb 24 2007 Hollenbeck A4457MOD.TXT

16 MR. BROADFOOT: Thank you very much. Please give
17 your name and your location.
18 MR. GONZALEZ: My name is Jose Gonzalez. I am
19 associated with a task force that was created out of the
20 ConCap last year, the health issues task force, and I am
21 the chairman of that task force.
22 I want to tell you a real quick story, and then
23 I will tell you the point that I want to make. In 1959 my
24 family used to live down in what was called then El Ollo
25 soto, which is right below Soto Street Elementary School.
26
27 And in those days there used to be this big pipe that was
28 for the flooding to go through and end up in the river.
29 And as kids during the summer, one day we decided we
30 wanted to use the L.A. River as a bike trail, so we went
31 through this tunnel that went all the way from that
32 location to the river to get on the bank of the river, and
33 we took our bikes and our friends and we all went down
34 towards Long Beach. So this is like a dream come true;
35 right?
36 The one point that I really want to make that
37 came out of the health issues at the congress, and that
38 is, in order to have a healthy planet, we have to have
39 healthy people. And I think that even in the other places
40 where there are rivers, et cetera, I think one of the
41 things that Los Angeles needs to do in this Master Plan is
42 expand the active areas. We have thousands and thousands
43 of kids, you saw some of them here today, who don’t have
44 places to be active. And I think the river can be a way
45 to accommodate, if we’re going to acquire land, let’s
46 acquire it for the kids as well.
47 We have diabetes. We have obesity. We have
48 lack of activity on the part of our children. That’s the
49 future. And the river will do us no good if the kids
50 can’t walk around and be able to enjoy it.
51 MR. BROADFOOT: Thank you very much.

T-3-1

MS. ROMAN: My name is Kathy Roman. I am the Green
02 Stage Public Affairs special events coordinator. I will
03 read this as briefly as I can.
04 We, the 2006 National Latino Congress, resolve
05 to endorse the adoption of pilot food waste recycling
06 programs and the use of biodegradable products at publicly
07 staged events and businesses to reduce organic waste going
08 to local landfills.
09 We are changing from a culture of waste disposal
10 into a culture of recycling discarded materials. We are
11 in need of educational components for the adoption of
12 alternative recycling programs. Whereas these
13 biodegradable products and recycling of discarded material
14 services provides an alternative disposal system instead
15 of using an in-sink garbage disposal unit, since there
16 have been extensive clogging problems involving food,
17 waste in the overflow of public sewers.
18 Whereas adoption of food waste recycling
19 programs combined with the use of biodegradable products
20 allowed for organic waste-hauling to be mixed with green
21 waste at a composting facility and the nutrient-rich
22 finished product is used by farmers and gardeners to help
23 grow larger and better crops.
24 We resolve to give the priority to government
25 and general businesses contractual services replacing
26
T-4-2

0019

Page 9

F-206
Public Comments and Responses

Comments

T-4-2
01 Styrofoam and petroleum-based plastics by implementing use of biodegradable greenware at the L.A. River Revitalization Master Plan. We number 2, we resolve to ask public-elected officials and public service servants to develop financial incentive programs that will divert food waste collected from our events for composting.

T-4-3
01 And finally, resolve the 2006 National Latino Congress urges the leadership implementing use of biodegradable utensils made of corn, sugar pulp, potatoes and the like in conjunction to the adoption of food waste recycling programs to reduce discard materials going to local landfills.

T-4-4
01 Green Stage has been presenting testimonies of all public hearings and is concluded to prepare for the L.A. River Revitalization Master Plan. Green Stage has been sponsored to implement performing arts and zero waste management control at programs combined at L.A. Historic State Park during 2006 by California State Parks, not a Cornfield, LLC. LA Eco Village, National Latino Congreso, Earth Day Network, KCVE and The Green Media Corporation.

T-4-5
01 But this has not been implemented, and it’s been ignored on the Revitalization L.A. River Plan. Thank you.

Mr. Broadfoot: Thank you very much.

Ms. Munoz: Good afternoon. My name is Ms. Munoz. I want to first thank the city, the consultant team, and everyone involved with what is a beautiful Master Plan. We met with them earlier this week to talk about our concerns that we have in the community.

And I come today and I see a soccer field in Canoga Park, so I really want to thank you for listening and not only listening, for taking it seriously because I think that’s really important. Many of the folks that we’ve been representing feel that there’s no reason to get involved because who cares, and we are really powerless and no one is going to listen. But I think that we’ve turned the corner. So I want to thank you for that.

However, I heard one thing today that alarmed me, and that was the word “relocation.” I am very alarmed because it was connected with poor people, and when it comes to poor people, we always talk about relocation and asserting eminent domain. The school district is doing it and there are many poor families that live in Boyle Heights and Canoga Park and other places along the river, and I want to make sure that when we talk about redevelopment and revitalizing the river or making it green and plush, that we are talking about a river that’s for everybody and not at the expense of very poor people because they’re really powerless in many ways and we have to make sure that we keep them in mind and not relocate them.

Mr. Broadfoot: Thank you very much.

Ms. Mendez: Hi. My name is Karina Mendez and I’m a parent in this community. You met my children. I have four boys who play sports in this community, and we’re really concerned about what you’re planning to do with the river in Boyle Heights. So I hope you guys take into account what they’re saying.

Responses

T-4-3: Comment acknowledged.

T-4-4: Comment acknowledged.

T-4-5: Comment referred on to the LARRMP team.

T-5-1: Comment acknowledged. In the Environmental Justice sections of the PEIR/PEIS (Section 3.15 and 4.15), the potential impacts on minority and low-income people in the areas of potential effect from implementation of the LARRMP have been assessed at the programmatic level. When specific projects are brought forward to implement the concepts presented in the LARRMP, then more definitive and specific impacts to minority and low-income populations in proximity to the River Corridor can be identified and evaluated, and proper mitigation measures incorporated to reduce impacts. The inherent intentions of the LARRMP goals are to enhance the quality of life for all Los Angeles citizens.

T-6-1: Your comment appears to be more directed to the planning process involved with developing and implementing the LARRMP. It is suggested that you discuss your concerns further with the City and other key stakeholders in the Boyle Heights area. Your comment has been passed on to the LARRMP planning team and the City.
F-208

Public Comments and Responses

Comments

T-6-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. It is suggested that you re-direct this question to the City and the LARRMP planning team. Your comment has been passed on to the LARRMP planning team and the City.

T-7-1: Comment acknowledged. Since sports fields require larger parcels of land than the existing River easements, these preferences must be discussed as individual projects move forward and land acquisition is discussed. See, for instance, the Community Planning discussion in the LARRMP’s Chapter 8.

T-8-1: Comment acknowledged.
Comments

T-8-1: wonderful, but we also could use -- there's room for both. We have plenty of jails here. We have plenty of freeways here. Now we need a sports complex for our kids.

0024 Thank you.

01 MR. BROADFOOT: Thank you very much.

02 MR. LOPEZ: My name is Alfred Lopez, and I am a registered crew leader of Crew 29. I am also representing the Los Angeles Area Scout Council where we have over 3,000 Boy Scouts in the Los Angeles area. I am here today to ask how we can participate in community service projects along the L.A. River route. We are a volunteer service organization, building good character, good citizenship, instilling good moral and ethical values in our youth.

0112 I am asking the L.A. River Master Plan to include special projects in hopes of creating an opportunity for us to earn the privilege of completing community service on our journey to Eagle Scout. A quote from John F. Kennedy: "Ask not what your country can do for you. Ask what you can do for your country."

0117 L.A. area scouts could complete special projects, which could include restoring the native California habitat, which animal, plants and native American artifacts constructing wigwams or straw huts. Whatever, caves, any type of -- we would like to see an Indian pow-wow meeting place for Indians to gather around and retain their culture. Also a ceremonial area would be good.

0125 A nature trail is needed in creating positive role models in our community. I would also like to see if we could include a river kayaking or river rafting project, which we like to include the safety of that. In the summer of 1967 our scout master took us to our first camporee at Firestone Camp. We packed five miles into our camp. It was a western style forts. It was built in 1906 and was donated, and that was special. Today I would like to give the opportunity to give back to the community, which they gave me the experience of scouting. Our scout master was Indian, American-born on an Indian reservation. He taught us survival, moral and ethical values, a good deed daily. "And on my honor I promise to do my best to do my duty to god and my country." Our scout motto is "be prepared." My prayer is that our requests will be granted in entirety and thank you for this opportunity to address this community.

01 MR. BROADFOOT: Thank you.

02 MR. MARTINEZ: Hi. My name is David Martinez, and I am representing the coordinating council as well as surrounding communities. I would like to thank again our mayor and a lot of our local leadership for this type of vision, especially in selected type of commonality that we find in the river, from its majestic flow to its wrathful deterrent when it's kind of angry.

03 I have a concern. And my concern is that in this presentation you mentioned that the entire venture, vision, is going to actually cost about three to six billion dollars. Probably minimum. I imagine we're talking realistically long term, inflation, what have you.

Responses

T-9-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. This kind of civic involvement is critical to the success of the LARRMP and would be coordinated through the work of the LARRMP-recommended River Foundation, should it be established.

T-9-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-9-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-10-1: Comment acknowledged.
T-10-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. See also Chapter 10 of the LARRMP, which discusses implementation issues and the importance of benefits to existing residents and businesses.

T-11-1: Comment acknowledged.

T-12-1: Comment acknowledged.

T-12-2: Comment acknowledged.

T-13-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. It is suggested that you re-direct this concern to the City and the LARRMP planning team. Your comment has been passed on to the LARRMP planning team and the City.
T-14-1: The percentage of Boyle Heights' youth, people under 25 is about 60 percent of Boyle Heights. That means we need schools. We need sports. And that's what you guys have been hearing. That's my first issue.

T-14-2: Also, along with -- I don't know if you guys are aware of the gentrification that is taking place in downtown. We do not want gentrification in Boyle Heights. We have been here for generations. And we do not want people to come in, bring all this with them. The rent prices are going to go up.

T-14-3: The many and varied communities along the Los Angeles River within the City are distinct in their characteristics and in their future visions for revitalization. Thus, it is imperative that project-level analysis of environmental justice impacts be conducted as individual projects move forward in various communities.

T-14-4: As well as being renters we are low -- not even low income. We live in poverty. We are 60 percent of the people in Boyle heights are renters.

T-14-5: Comment referred on to the City of Los Angeles. The draft LARRMP and the Notice of Availability (NOA) for its Draft PEIR/PEIS were published in the Los Angeles Times on February 2 and both documents were placed in 16 public libraries along the river corridor prior to that day — including Benjamin Franklin Branch Library. Throughout the 54-day public review period, the documents were available online along with Spanish translations of the Executive Summary and NOA. Each of the 18 public workshop presentations were also presented in Spanish and at least two of these were hosted in Boyle Heights. We understand that it is difficult to reach everyone and hope that concerned and involved residents, such as you, will help us spread the word and improve our outreach in the future.
T-15-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. See, in particular, Chapter 10 of the LARRMP, which addresses gentrification concerns.

T-15-2: Your comment is more related to specific implementation aspects of the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. The recommendations proposed in the LARRMP are not final; they are open to change. Your suggestions should be expressed as individual projects are considered for implementation. See, for example, Chapter 8 of the LARRMP, which discusses future community planning activities which will provide opportunities for you to share such input.

T-15-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-16-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
Comments

T-16-1
And so we are supporting the Alianza de los Pueblos del Rio and recommendations for more active recreation areas along this river. We are also pleased that Mia Leiner is involved because we know that this is going to mean that the parks that are going to be built are going to be environmentally sound. They're going to retain the storm water so that no water is going into the river, and that we have an environmentally integrated system. Thank you very much.

T-16-2
T-16-2: Comment acknowledged.

T-17-1
Mr. BROADFOOT: Thank you, sir.
Mr. Gonzalez: Good afternoon. My name is Antonio Gonzalez. And I am the president of the Southwest Voter Registration Education Project, as well as the Willie Velasquez Institute. I am also part of the Alianza de los Pueblos Del Rio Los Angeles Coalition that has been working on the L.A. River issue for some time now. I am also a speaker from the Fabian Nunez representative to the City Board of Santa Monica Mountains Conservancy and have just joined the State Board of the Audubon Society.

And we have already distributed some comments, critiques and so forth of the plan that was released a couple weeks ago. We will submit these in written form to be on the official record. But basically while acknowledging the really excellent work of the City of Los Angeles and Stalwarts such as Debra Weintraub and Mia Leiner and Councilman Reyes and all of you that have been so involved in this, Lupe Vela, and we support a lot of the things that are in the plans, support the greening revitalization of the Los Angeles River, we believe that the narrative, basic explanation incumbent in the plan is out of balance, that is, it is strong on the environmental and greening side, but it is weak on the issues of public health and the socioeconomic needs of the majority of the population that lives along the L.A. River.

Many of the commentators have talked about education and soccer fields and jobs for the community, and they are all absolutely in agreement with our position. And we feel this is an imbalance that can be corrected. We have already begun to meet with you all and many of you all have shown us very good faith. And we are optimistic that we can correct the narrative. And the reason I use that term is because we know that not all this process is finished and a lot of the projects are not all figured out. But it's very important that the basic vision that is emitted by the City leaders get it right at the beginning of this official process.

We don't want to have to try to run around, putting in our issues and our themes. We should be included from the outset.

And we believe that we should not separate things like community health and jobs and affordable housing and schools from the greening of the river. We believe it's one united cloth, social cloth, if you will. What's good for nature, what's good for the people, should be together.

And that's really our critique. And we want to work with you to make it right and we're going to submit language and submit these written comments. And just to

Responses

T-17-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. Also, see response to Comment T-14-3, Chapter 8 of the LARRMP, regarding future community planning activities, and Chapter 10 of the LARRMP, regarding implementation issues.

T-17-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
T-17-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. Such feedback should also be communicated during the implementation of individual LARRMP projects as they move forward. Again, see Chapter 8 of the LARRMP regarding future community planning activities and Chapter 10, regarding implementation.

T-17-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-17-5: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-18-1: Comment acknowledged. The issue of public water safety and the increased potential for drowning and injury associated with increased opportunities for river access is addressed in the PEIR/PEIS in Sections 3.11 and 4.11 (Public Health and Safety).

T-19-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. Please see Chapter 10 of the LARRMP, which addresses implementation issues, including gentrification. Also see Chapter 8 regarding community planning. As of this printing, the Boyle Heights Community Plan is undergoing an update; please contact the City’s Planning Department to find out more.
T-19-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-20-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-20-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. See, in particular, the LARRMP recommendation No. 5.16 to create a River Arts Program.

T-20-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. See response to your first comment, above.

T-20-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-20-5: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-20-6: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
Public Comments and Responses

Comments

T-21-1
Comment acknowledged. In accordance with CEQA and NEPA guidelines, both the draft LARRMP and the draft PEIR/PEIS have been available on the City website, and copies were placed in local libraries at the beginning of the comment in late January 2007, and will remain available at those locations until the comment period closed on March 27, 2007. At the time that this comment was received (during the Public Hearing on the draft PEIR/PEIS on February 24, 2007), there was still one month remaining in the comment period.

T-21-5: Comment acknowledged.

Responses
T-22-1: Comment acknowledged. See response to Comment T-17-3.

T-23-1: The PEIR/PEIS indicates that parking is an issue to be addressed in transportation and parking studies that will accompany specific the implementation of future LARRMP projects.

T-23-2: Comment acknowledged. See response to Comment T-17-3.

T-23-3: Cultural Resources have been addressed in the PEIR/PEIS, and recommendations have been made to study, evaluate and mitigate any potential impacts to cultural resources when specific LARRMP projects get identified and proposed. This comment was also passed on to the LARRMP planning team for further consideration. See also Chapter 5 of the LARRMP, which recommends the inclusion of local arts and culture in river project development.

T-24-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. Please see Chapter 8 of the LARRMP, which discusses future community planning activities.

T-24-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
Comments

T-24-2
18 polluted water into the ocean, which is a very important 19 point of view. But how do you integrate this river and 20 make it a river again? How do you integrate community 21 into this river?
22 I know you have taken some stabs at it, but it 23 still seems like there’s way too much industrial, M-1 24 zoning, along the river. M-1 zoning, if you wanted to put 0046
25 any kind of residential in an M-1 zone, you would have to 26 go through a huge discretionary approval process.
27 I think it’s very important to redraw all along 28 the river to allow for the greatest flexibility in how the 29 land is developed so that there is an infrastructural 30 encouraging, a zoning encouraging of mixed use like San 31 Antonio, residential, commercial and the parks.
32 How do we make it a resource that people want to 33 live and look at and enjoy? How do we make it a river 34 again and make it integrated into our community? So I am 35 very disappointed. There’s, I think, M-1 allowed, 36 particularly in CD14, and in this area where it’s M zoning 37 along the river, bad, bad, bad. It needs to be a mixed 38 use zoning. And that’s very, very important.
39 And I don’t know exactly how you’re working with 40 the L.A. City zoning and planning director in this effort, 41 but I think that before you finalize this plan, there 42 needs to be much more sort of broader outreach as to the 43 master planning and zoning aspect in the City of 44 Los Angeles. Thank you very much.
21 MR. BROADFOOT: Thank you very much.
22 MR. CASTANOS: Good afternoon. My name is Juquin 23 Castanos. I’m at home in Boyle Heights. I have been 24 here living for almost 17 years. I came from Mexico. And 25 one person said we need education. The education had to 0047
26 start when you come to this country. I had to go to 27 school to learn English and this is the chance that this 28 country gave us to speak.
29 One of the concerns is safety. We can build a 30 beautiful river, but if it’s not safe for me to go there, 31 it’s not going to be doing nothing. Safety should be a 32 priority for kids, for youth, for all people to go and 33 enjoy the beauty of the green.
34 There’s two things I believe, it’s education and 35 environment. This brings everything together, education 36 and environment. And I just applaud and I hope I can 37 still participate and give my opinions. But I do believe, 38 like somebody said, we need parks, we need housing, we 39 need schools. We need to get involved. If we don’t get 40 involved, nothing is going to be built. And we do need 41 everything. But we have to start working, speaking, and 42 don’t let people use you to go and speak for this.
43 I don’t represent any organization. I speak by 44 myself and I encourage everybody to come by themselves. 45 Don’t take somebody else to give the credit. Take the 46 credit for yourself and for people who really work for 47 those people who do all the work.
48 So I want to congratulate you and thank you for 0048
49 giving us this chance that America gave us to speak out 50 from our heart and from our mind. Thanks.
51 MR. BROADFOOT: Thank you, sir.
52 MS. REYES: Hi. My name is Valerie Reyes and I come

Responses

T-24-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-24-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-25-1: Comment acknowledged. The issues of public safety are addressed in the PEIR/PEIS in Sections 3.11 and 4.11 (Public Health and Safety).

T-25-2: Comment acknowledged.

T-25-3: Comment acknowledged.
Comments

T-26-1: Now, I happen to be a mother of eight kids.
Now, if I bring my kids down to any one of these parks for the river that you guys are talking about forming up, what are you going to do for my kids to keep them occupied? To keep them entertained? What are you going to do to educate them while they're there at the park? Anything that I do with my children has to be educational.
Any trips that I make with my children are always educational. What I see here is basically we can teach them a lot about the trees, a lot about the grass, and talk about the river. But what else is there? There's more to life than just that.

T-26-2: And in the parks that we have nowadays, they're right as far as the culture where we come from. You have to be sensitive to that. If I take my kids to a park in East L.A., they're going to be like, okay, this is where we go fishing. How do we fish? They're going to want to know how you go about fishing. What kind of fishes are in there? Are you able to eat them? How can you dissect them and make sure you don't get sick from them and what have you. There's a variety of things in there. But if I take them to a park outside our community, they're like, 'Well, Mom, how come they eat different?' and 'How come,' you know, and then we teach them as far as our culture. But you guys are not talking anything about culture. You have been talking anything about every child individually. Remember, we work with different ages and stages of kids throughout them growing up, and if you can't provide education, if you can't provide us with adequate -- if you can't provide them with adequate activities, educational active, then how can you say that this is family park? It's not. It's not. It has to be family. And if you want the community involved, then here's what you have to do, is get the families back involved. You want the mothers and fathers to jump up and say, 'Okay, we want to get involved, help you do the fund-raising, help to get this program going. We have the resources.' They're not going to do it unless you're going to benefit their children. So you need to work on that more. Thank you very much for your time.

T-23-4: Also Village. I was leaving but a thing came to mind. One of the reasons that you all have to understand why renters aren't here, I am a homeowner. I am not threatened as a renter to come and speak. That's why you don't have renters. Keep that in mind. You want Boyle Heights to come out. Renters do not come out because they...
T-23-4
EIR/EIS Hearing Feb 24 2007 Hollenbeck A4457MO0.DTXT

are threatened. If they speak their voice, they will lose
their home. They would lose whatever privileges they
have. Please keep that in mind. Thank you.

UNIDENTIFIED SPEAKER: Good afternoon. I am
Ecuadorian. It's only been 150 days since I've stepped in
this marvelous country. I am going to fight so as not to
go.

I mention my nationality because in my country,
in one of the most important cities, I was part of a very
similar project. Not with the magnitude that I have found
here because there's only 12 million citizens there.
Actually, I don't belong to any community.

But what I am going to do is I am going to
participate in everything that I've heard. In fact, the
lady in red who has eight children, she mentioned the
subject about education and culture. That's the
participation I am going to provide this country in
reference to the forestation and culture, recovery of
ecosystems, but I want to do it through the children
because everybody spoke about games or playing, but nobody
said how to do it.

I don't know how I'm going to start. I don't
know how I'm going to ask any of the communities here to
either teach me or to take me in, because even to get here
it took me two hours. I lost two hours. Don't worry
because it was voluntary. Thank you very much.

MR. BROADFOOT: I want to say thanks to everyone who
gave their comments. Oh, Alexia. Go ahead.

MS. TERAN: I will touch on the education and to the
lady over here who mentioned that we in Cypress Park have
done nothing. I'm sorry. She's uninform ed and uneducated.
I live in Cypress Park for 42 years. And I have done my
part. For the last 20 years, which I have --

Oh, I'm sorry. I didn't say my name. My name
is Alexia Teran and I live in Cypress Park. Earlier when
I mentioned all the members -- a member that I am of three
organizations. I didn't mean to speak for that. I just
mentioned that because I believe in education. Education
encompasses everything. So I want education for
everybody. Not just for some cultures or genders.

Everyone.

So having said that, we have been working on the
L.A. River for many years. Clean ups. That's one of the
things that we've done. Also, there is a lady by the name
of Melanie Puentes. She has done a lot for the river.

And I participated in that beautification of the
river. We have done little plagues, which I hope they
will come and be there for that opening day, which is
coming soon. And also there is -- I don't know if they're
still here, it's a large percentage of kids from the
Anawak organization. They usually go out there and do
clean ups. So when you say that we haven't, I'm sorry,
but, lady, you are uninform ed.

So I have to make that point. And for the lady
who has a lot of children, there are ways to be educated.
As I mentioned before, Melanie Puentes, she came to me,
because as I said before, I live in Cypress Park and I
volunteer for everything. She came to me, went to the
elementary. We encouraged a classroom of children to
participate, educate themselves about the river and
participate so when they own the river they'll take care

T-27-1: Comment acknowledged.

T-1-5: Comment acknowledged.
MR. BROADFOOT: Thank you very much.
Before I turn the microphone over to Gary for
sending us over. I just want to mention two things. One,
to the gentleman that mentioned the report that we just
did is not available, I just wanted to say it is actually
available on the website of the City of the
L.A. River.org website. You should be able to find it
there. If not, just call Carol and she’ll get you hooked
up with a copy. So I wanted to mention that.
Also, Miguel Luna, we want to translate for the
Spanish-speaking people here.
Those who are Spanish-speaking, if you want to
contact Miguel Luna, (213) 481-2937, or his e-mail,
"Miguel.Luna at L.A.City.org. ” And he will help you to
make your comments if you need to do it that way.
MR. MOORE: Thank you, thank you, thank you.
(Public hearing adjourned at 1:00 p.m.)
EIR_EIS Hearing Feb 27 2007 Canoga High A4478MOD.TXT

LOS ANGELES RIVER
REVITALIZATION MASTER PLAN

DRAFT PROGRAMMATIC ENVIRONMENTAL
IMPACT REPORT
DRAFT PROGRAMMATIC ENVIRONMENTAL
IMPACT STATEMENT
PUBLIC HEARING

TRANSCRIPT OF PROCEEDINGS
CANOGA HIGH SCHOOL
CANOGA PARK, CALIFORNIA
TUESDAY, FEBRUARY 27, 2007

REPORTED BY:
RUBEN GARCIA
CSR No. 11305
Job No.:
A4478MOD

LOS ANGELES RIVER
REVITALIZATION MASTER PLAN
DRAFT PROGRAMMATIC ENVIRONMENTAL
IMPACT REPORT
DRAFT PROGRAMMATIC ENVIRONMENTAL
Comments

TRANSCRIPT OF PROCEEDINGS, taken at
Canoga Park High School, 6850 Topanga Canyon,
Canoga Park, California, commencing at
8:24 p.m., on Tuesday, February 27, 2007,
reported by RUBEN GARCIA, CSR No. 11305,
a certified shorthand reporter in and for
the State of California.

APPEARANCES:
Staff:
Alex Watt
U.S. Army Corps of Engineers
Los Angeles District
David Breadfoot
Tetra Tech Consultant
Gary Moore
City of Los Angeles Department
of Public Works, Bureau of Engineering
Chris Robert
The Robert Group
Community Outreach
Ira Artz
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Deborah Weintraub
Comments

EIR_EIS Hearing Feb 27 2007 Canoga High A4478MOD.TXT
City of Los Angeles Department
of Public Works, Bureau of Engineering

Carol Armstrong
City of Los Angeles Department
of Public Works, Bureau of Engineering

Scott Jordan

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Urban Design

INDEX

Opening and Presentation by David Broadfoot 5
Public Comments 13
Adjournment 26

EXHIBITS
(None)

Page 3 F-224
Canoga Park, California, Tuesday, February 27, 2007
8:24 p.m.

MR. BROADFOOT: We're going to get started with the formal public hearing portion of the evening, and I will introduce our court reporter, Ruben Garcia. He's a lightweight heavyweight boxer, and he really is. He's also a good court reporter. So he's over here and he's going to record the formal hearing portion of this meeting tonight. We've closed officially the workshop portion and now we are opening up the formal hearing on a different document, but one that is supporting the Master Plan. The document that we'll be talking about here and wanting your comments on is a combined document, as you have heard, which is a combination of both the state and the federal requirements for looking at environmental impacts that could be associated with this long term, as well as perhaps short term, implementation of the Master Plan.

And as you might imagine -- feel free to take your seats and those of you who have signed up to make comments, we'll give you some ground rules about that in a couple of moments. I just want to take a few moments to say a few words about the Environmental Impact Report and Environmental Impact Statement that we have done. My name is Dave Broadfoot, and I am with Tetra Tech. And I have had the privilege of overseeing, being the leader of about eight to ten people, professional people who have prepared the Environmental Impact Report and Environmental Impact Statement for the implementation of the projects that could come out of the concepts which are presented in the Master Plan.

And the Master Plan, as has been said, is concept, is at the concept level, but the guidelines from the federal government and from the state government regarding environmental impacts include as early as possible to start looking at the potential impacts so that decision-makers can say, "Oh, wow, that's a lot of impact for what we're talking about, so maybe we should adjust what we're talking about."

So taking a programmatic approach is what we're doing here. But it's well-timed to do that now because now is the time we can make some changes. And there's a second reason, too, And that is that if you do a Programmatic Environmental Impact Report now, it can help streamline and cut down the time and...
EIR/EIS Hearing Feb 27 2007 Canoga High A4478000.DTX

24 effort involved in the subsequent projects that will come
25 out, hopefully will come out of the Master Plan, as money
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01 gets appropriated or becomes available, as communities get
02 interested in doing different things, as the city may move
03 forward with some suggested plans, and so forth. So
04 there's a lot to be done and we have taken the first step
05 in doing the environmental analysis of impact.
06 So right now we're at the second meeting here at
07 Canoga Park, and we'll have one more meeting tomorrow
08 night.
09 We really are looking at the 32 miles, and we're
10 looking at a half a mile on each side of the 32 miles
11 between Canoga Park and the City of Vernon, and all of the
12 City of Los Angeles. We're looking at the corridor and
13 the five opportunity areas that have been discussed
14 already.
15 Just a couple words about our approach. Because
16 there's so much involved in the Master Plan, we decided we
17 would boil things down to what is going on when they talk
18 about river channel modifications, and what is going on
19 when they're talking about open space, things like parks
20 and green streets and all those things. So we made a long
21 list of those. And then we said let's take a look and see
22 what happens along the river corridor and the five
23 opportunity areas if those things were to happen.
24 And we also then looked at the alternatives that
25 were addressed in the Master Plan, and there's two of them
0008
01 for four of the five opportunity areas, and Taylor Yard
02 has one alternative that we looked at, otherwise we looked
03 at two alternatives for each.
04 And we also looked at a pretty comprehensive
05 list of environmental factors here, 16 areas that even
06 have some subdivisions, as you can see. But we hope that
07 this was a pretty comprehensive list, and we asked
08 ourselves, what could possibly happen to these resource
09 areas if projects were to become reality in creating a
10 greenway or creating a pedestrian bridge or fixing, you
11 know, expanding on some of the river channel or changing
12 the river channel and so forth. So we looked at all of
13 those different things.
14 We found that about 10 of the 16 had certain
15 aspects that could have the potential for significant
16 impacts. And so we were raising the flag even at this
17 program level, saying to the City and to the Corps of
18 Engineers and to all the communities, you know, 'Look at
19 these areas in particular when you're going to look at
20 projects because these are the areas that are most likely
21 to have potential impacts of significant levels.'
22 And some of the types of impacts that we're
23 talking about range from dust, as you might imagine.
24 during construction. There are some biological areas that
25 are a quite nice habitat, and they could be adversely
0009
01 affected during construction.
02 There's cultural resources all along the river
03 corridor, and these could be affected significantly too if
04 we're not careful.
05 People that are living along the river,
06 especially the people that perhaps are low income or
07 minorities that are living along some parts of the river,
08 could be affected perhaps with having to look at some job
EIR EIS Hearing Feb 27 2007 Camoga High A4478M00.TXT

place. We also talked a lot about water quality today, and that's an issue that could be significant as well. Land use. There's land use planned all along the river, and to go in and make some changes that are being talked about in the Master Plan, could have significant impacts without -- so you have to look at what the existing plans are as well. There is noise, as you might imagine, during construction. There's public health and safety issues as we talked about a lot here today. And we recognize and assess those as well.

And then things like socioeconomics, the jobs could be affected and people's homes could be affected and so forth.

So those kinds of impacts we felt could be significant and need to be looked at in great detail when projects get identified. I think we talked a little bit about those.

And then transportation is a big issue, as you know, in Los Angeles. And whatever you do is going to either increase traffic or decrease parking or have some effect on our circulation patterns and so forth. So those things really need to be looked at carefully.

We also searched to find and wrote into the document what we call mitigation measures. And we applied -- these can be applied to all 16 resource areas. These are measures that can be taken during construction and during operations and during maintenance and so forth that we feel if they are measured or taken, they could reduce the potential impacts. And it is our assessment that with the range of mitigation measures that are available from past experiences, if they're applied, we feel that the levels of impacts would be reduced to non-significant levels. Not that they would not be there, but they could be perhaps less than significant. This is our assessment that we made in the document.

And I listed some of the potential mitigation measures here. I won't take the time to go through them, but have a look here and see that there's things that can be done to control noise, to do traffic impact analysis, and parking, increasing parking and so forth. There's the socioeconomics could be looked at. There's mitigation measures that could be applied to all 16 categories to reduce the level of impact.

We are now at the stage of having completed the draft document. It's available on the website, as Gary had mentioned earlier, and we urge you to look at it if you haven't done so already.

And tonight, to move on to what we're really all about in the hearing portion tonight, is to give you a chance, those of you who want to make your verbal comments or oral comments tonight, we have the court reporter that will be making a transcript of what we're saying here. But that's not the only way that you can make comments. We have comment forms that you might have seen when you came in. They're still available back there. Please take a comment form and fill it out and send it in to the City. The address is there, Carol Armstrong's.
T-28-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team.
Comments

T-28-1
05 flooding, or that there won’t be flooding, like that 06 concrete-lined river. 07 I don’t know why in all the plans there’s 08 constant talk about getting rid of that concrete lining. 09 It saves Los Angeles. It works. Why tamper with it? 10 Maybe this will work. But maybe it won’t. If it doesn’t 11 work, it’s disaster. We know something works now. So in 12 my opinion it’s mindless to talk about tampering with the 13 river and removing the concrete lining.

T-29-1
14 MR. BROADFOOT: Thank you very much for your comment. 15 MR. SALKIN: Hi. My name is Adam Salkin. I grew up 16 in the area, and I mentioned some of my concerns earlier. 17 Basically, my concerns are that I read that 18 there eventually could be boats, fishing, swimming, 19 playing in the water, and contamination in the water. 20 Basically, the water quality is my concern. 21 I want to make sure that the Department of 22 Health Services, Department of Toxic Substances Control, 23 which I saw on there, is actually paying that the water is 24 safe before it gets to the point where people are touching 25 the water and playing in it, that it’s being tested not 26 only for the metals that are mentioned in the paperwork 27 that you have in the Master Plan, but other things like 28 tritium, chloride, things that have been found coming down 29 off of the Santa Susana Field Lab where I grew up. 30 There’s a lot of people that have health problems in that 31 area, and if the river is opened up, my concern is that 32 more people are going to be affected by the toxic 33 chemicals that are coming down off of that site. 34 Also, things like fires, Pratt and Whitney was 35 mentioned in the plan before in Canoga Park. There was 36 uranium fire that was there. That’s actually touching the 37 river. So I want to make sure these things, the water 38 quality is at a safe level before kids play in it. Thank 39 you.

T-29-2
40 MR. BROADFOOT: Thank you.
41 MR. JACOBI: My name is Bob Jacobi, I’m owner of a 42 small business here in Canoga Park. Been there for 43 years. We’re now in a harm’s way. As a member of both the 44 Chamber of Commerce of Winnetka and Canoga Park, I have a 45 real problem, like any small business, just to line the 46 pockets. Canoga Park High School has been here for 47 years, you people are developing this water feature 48 32 miles. This school doesn’t have a pool. We don’t have 49 the money for a pool for the school. It’s all about the 50 kids. And I don’t think the future of our kids should be 51 paying for 20 or 40 years from now keep paying for this 52 project. As a responsible parent I can’t believe in this 53 project. Spend that kind of money. Thank you.

T-30-1
54 MR. BROADFOOT: Thank you, sir.
55 MS. BURMAN: My name is Tsilah Burman. I’m executive 56 director of the Los Angeles Neighborhood Land Trust that 57 creates parks and community gardens in low-income 58 communities, and I am also a resident of Woodland Hills. 59 I just wanted to comment on the importance of pocket parks 60 and greenways. And how the river bisects many underserved 61 communities which desperately need open space. 62 They are underserved and under-parked, and the 63 possibilities that this Master Plan opens up to those 64 areas I think will be an asset to the communities that it
T-31-1: Comment acknowledged.

T-32-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-32-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-33-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-33-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-33-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-33-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
F-231

Public Comments and Responses

Comments

EIR/EIS Hearing Feb 27 2007 Canoga High A4478N0D.TXT

the Master Plan to override those particular things. We
really need to have our own character, and ours is a
unique situation so we would like community input on our
projects.

Weddington Park is right next to Studio City.
It's right next to Universal. And residents there have
asked me to say that Universal is now doing a huge, huge
development plan right next to Weddington High-rise.

So they request that whatever is done there is
natural and does not ask there to be more traveling
to those parks because it's making it almost unbearable
for the residents as it is.

I also want to say that the Master plan as it
goes along with the RIO afterwards, that it should be
flexible in the way that it flows. In Studio City one
way, in the cornfields another way as to the width of how
this is so that each community can be configured in a
separate way as to what the residents and people who work
there need.

Two other things. One is CSS Michael Klausman
has empowered me to say that security is really important

T-33-7: Comment acknowledged.

T-33-8: Comment acknowledged.

T-34-1: Comment acknowledged. Language based on your comment will be added to the list of mitigation actions in Section 4.7.8 of the Biological Resources section.

T-34-2: Comment acknowledged. Your suggestion has been passed on to the LARRMP planners and the City.

T-34-3: Comment acknowledged. Your suggestion has been passed on to the LARRMP planners and the City.

Responses

T-33-5: Comment acknowledged.

T-33-6: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. Please also see Chapter 8 of the LARRMP, which discusses future community planning activities.

T-33-7: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-33-8: Comment acknowledged.

T-34-1: Comment acknowledged. Language based on your comment will be added to the list of mitigation actions in Section 4.7.8 of the Biological Resources section.

T-34-2: Comment acknowledged. Your suggestion has been passed on to the LARRMP planners and the City.

T-34-3: Comment acknowledged. Your suggestion has been passed on to the LARRMP planners and the City.

Mr. BROADFOOT: Thank you.

Mr. OHLENKAMP: My name is Kris Ohlenkamp, and I have
lived in the west valley for about 55 years. I am also
president of the San Fernando Valley Audubon Society and
my comments are related to the biological resources of the
document. I have three recommendations.

I mentioned that there will be some short-term disruptions of the biological resources during
construction. A lot of that can be alleviated if
construction is only done from September through January because the river is already being used as a connector by
migrating birds and breeding birds during the other period
of time.

Number 2, I also recommend that all of the
planting along the Los Angeles River be native plants.

That would cut down both on maintenance costs and to
improve the wildlife values rather than sod and nonnative
plants.

Thirdly, the Habitat Island in the chinatown
cornfield section could be improved if public access to
that island was eliminated so that birds could be using
that island as a breeding place as well. So those are my
comments. Thanks.

Mr. BROADFOOT: Thank you very much.

Page 10
Public Comments and Responses

**Comments**

**T-35-1**: In the Final PEIR/PEIS, specific language from your comment will be added to Sections 4.4.8 and 4.5.8 (Mitigation Actions and Best Management Practices) regarding soils and water quality, respectively, and to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor.

**T-36-1**: Comment acknowledged.

**T-36-2**: Comment acknowledged.

**T-36-3**: Comment acknowledged.

**T-37-1**: Comment acknowledged.

---

**Responses**

**T-35-1**: In the Final PEIR/PEIS, specific language from your comment will be added to Sections 4.4.8 and 4.5.8 (Mitigation Actions and Best Management Practices) regarding soils and water quality, respectively, and to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor.

**T-36-1**: Comment acknowledged.

**T-36-2**: Comment acknowledged.

**T-36-3**: Comment acknowledged.

**T-37-1**: Comment acknowledged.
Comments

T-37-1
23 years ago. Within months of opening every square foot of
24 concrete in this Canoga Park portion will be covered with
25 graffiti, especially the murals. Just because this may
0024
01 work in Studio City doesn’t mean it will work here.
02 Pocket parks or the more scattered distribution
03 would be preferable for the park aspect rather than a
04 string of them along one chosen area.
05 And on another topic, in the past we had a
06 problem with kids riding the river during high flow
07 periods. Now we’re inviting it. Thank you.
08 MS. BACKLOR: Hello. My name is Shelly Backlor. I’m
09 the executive director for Friends of the Los Angeles
10 River, but I am also a Canoga Park resident. And I have
11 had the privilege and honor of participating on this plan
12 from the beginning, and as a Canoga Park resident have
13 been very supportive of this vision, not just
14 professionally but as a resident living in this area,
15 being able to really ride my bike and walk down to the
16 river and have it be a part of the experience of the
17 valley.
18 I really appreciate everyone coming out tonight
19 and voicing your opinions and having a dialog because 20
21 years ago people were laughed at when they thought about
22 the Los Angeles River and realizing that it is a natural
23 resource and a destination.
24 I would really like to encourage people who have
25 not been to part of the south part of the river where
0025
01 people daily walk their dogs, ride their bikes, and really
02 have a connection to the river.
03 Because we have such a highly industrialized
04 area we do not have those connections. We see the signs
05 on the bridges and we might go to Balboa Lake and not even
06 realize that the L.A. River is there.
07 So as part of Friends of the Los Angeles River,
08 we realize this is a vision. Many parts of it are
09 attainable. We’re idealists. We want a fishable,
10 swimable, boatable river. We share the same concerns
11 that you do about safety, water quality and all of those
12 things. But one of the things that I’m most pleased about
13 is that there’s 259 projects from small scale to large
14 scale. There’s not much in the way of concrete removal.
15 That’s a good thing. We do not want to compromise flood
16 protection. But the fact that we will have green areas,
17 green streets, green places to commune and to be
18 celebrating is incredible. Thank you so much.
19 MR. BROADFOOT: Thank you.
20 MS. BACKLOR: Hi. My name is Joseph Backlor, and I
21 want to say this is great because it will be much nicer
22 for places to hang out, and it will make the city
23 beautiful.
24 MR. BROADFOOT: Thank you.
25 MR. HERMAN: My name is Eric Herman. I’m from
0026
01 Sherman Oaks, and I want to say that one of the greatest
02 things a person can do is potentially unify parts of the
03 city that had never thought of each other as both parts of
04 L.A. And I really look forward to developing this as a
05 singly unified vision. So even while communities are
06 working separately on each of the pocket parts or ideas, I
07 hope the idea of it as a single entity does not get lost.
T-40-2: Comment acknowledged.

T-40-3: Comment acknowledged.

MR. BROADFOOT: Thank you. Any other people wanting to make a comment for the record? And remember, there are other ways that you can comment, either on line or through the paper comment forms or letters or phone calls. And Carol Armstrong is right here. If you want to talk to her, she's right here.

She's the project manager.

So that will conclude the public hearing. Let me say thank you on behalf of Gary Moore and everyone else who participated tonight. Thank you for coming and thank you for participating.

(Public hearing adjourned at 8:59 p.m.)
EIR_EIS Hearing Feb 28 2007 MWD A4498MOC.TXT

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Los Angeles River Revitalization Master Plan

Draft Programmatic Environmental Impact Report

Draft Programmatic Environmental Impact Statement

Public Hearing

Transcript of Proceedings
Los Angeles Metropolitan Water District
Los Angeles, California
Wednesday, February 28, 2007

Reported by:
Ruben Garcia
CSR No. 11505
Job No.:
4498MOD(C)

Los Angeles River
Revitalization Master Plan

Draft Programmatic Environmental Impact Report

Draft Programmatic Environmental Impact Statement

Page 1
TRANSCRIPT OF PROCEEDINGS, taken at
Los Angeles Metropolitan Water District,
700 North Alameda, Los Angeles, California,
commencing at 8:15 p.m., on Wednesday,
February 28, 2007, reported by RUBEN GARCIA,
CSR No. 11305, a Certified Shorthand Reporter
in and for the State of California.

APPEARANCES:

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EIR EIS Hearing Feb 28 2007 MWD A449MED.TXT
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INDEX

01 02
Opening Remarks 5
Public Comments 13
Adjournment 26

EXHIBITS

(None)

Page 3
MR. BROADFOOT: I would like to convene the formal hearing part of the evening. If you wouldn’t mind taking your seats, I will say a few opening remarks and I will ask a representative from the Corps of Engineers to say a few words as well.

My name, again, is Dave Broadfoot. I’m with Tetra Tech and I am an environmental planner, scientist, and I have had the privilege of heading up a group of eight professional people who have been working on developing the combined programmatic EIR and programmatic EIS for the L.A. River Master Plan.

So those who want to discuss things, if you wouldn’t mind going out into the hall, that would be a great place to do those discussions rather than in this room. So we’ll just wait for you folks to do that.

So I assume that those folks that are in the room want to be here for the formal hearing part. You’re perfectly welcome to go outside and talk to the community planners or anyone out there.

But let’s get started with formal public hearing.

A requirement of both CEQA and NEPA is that when a government agency moves forward on a project, there needs to be environmental review taking place according to some pretty prescribed protocol. And that’s what we have undertaken with the EIR/EIS. And it is a collaborative effort between the city and the Corps of Engineers, as has been mentioned.

It is a different document than the Master Plan. And if you haven’t had a chance to look at it, I encourage you to do so. We haven’t been able to keep it under 600 pages unfortunately, which is the case with these environmental documents sometimes.

And even though we’re at a programmatic level, it’s important to bring forward to raise the flag on where the potential environmental impacts are that could be significant and that really need to get attention in looking at specific projects which might take place.

And so I would like to ask Alex Watt to come up from the Corps of Engineers. Alex is the chief of the Environmental Branch of the Los Angeles District of the Army Corps of Engineers, and I’ll ask Alex for a few opening remarks.

MR. WATT: Thank you, David. We have been doing
Comments

MR. BROADFOOT: Thank you, Alex. I just want to say a few words to introduce the study that we have done here of the potential environmental impacts of the potential projects that may come out of the Master Plan.

This is the third of three public hearings that we have held. And as has been said, our study area has been the 32-mile corridor of the Los Angeles River from Canoga Park down to the city of Vernon through the city of Los Angeles. Half a mile on each side of the river has been our study area. As well focusing on the five opportunity areas as well.

But it was a pretty daunting task to try to look at all the things that were being talked about in the Master Plan. So what we did, with the help of the Master Plan team, was to kind of boil down what we felt were the particular features that would be taken place, regardless of where they might be placed, and those features would fall in the categories of channel modifications or open space measures that we had a long list of open space measures from the green of the streets to the parks to all the recreation types of areas to the infiltration areas to the wetland areas and so forth, habitat restorations.

And so we had those two general categories. And then we proceeded to look at the reaches, knowing that the different reaches would be where different types of river channel modifications might be effective.

And with the single alternative at Taylor Yard, and important to me is that we looked at 16 resource areas, and we asked ourselves the question, what could possibly happen to these resource areas from the potential features and projects that might come out of the Master Plan.

This is a pretty comprehensive list. And we've found that 10 of the 16 were areas where potential impacts
So we felt that even at the programmatic level, it was important to point out that there are these areas where significant impacts could take place. And they could range -- these impacts could range from things like dust -- obviously construction impacts are pretty big for any of these types of projects. Disruption to the biological resources in some of the high-quality areas that there are and that you know of. The cultural resources, the potential for significant impacts here, because there are cultural resources that are known and unknown along the river corridor.

There are people living along the corridor that may be economically disadvantaged. And those folks need some particular attention when it comes to looking at changing land use or involving with developing any of the implementation. And water quality issues. When you are constructing, you are creating sediment, and there's all types of other water quality issues, as you well know, that we felt could be significant here that needed to be addressed.

Same with land use. There are land use plans in place along the river corridor, and any changes to these would have to be well-researched and interfaced with the communities.

Noise is a big factor, as well as public health and safety, as you know, not only in the vector diseases that could be increased with increasing ponding of water and that type of thing, but also the potential for drowning and other water-related accidents and death that could occur. So we felt that these are potentially significant areas.

The socioeconomic impacts could be significant. And transportation. I've heard people talk about the fact that parking and circulation of traffic and all of these issues could be significant.

So we felt that these should be looked at in detail when the projects are identified for implementation. But also we, as part of our work, looked at the potential mitigation that could take place.

And as you know, the use of mitigation measures during construction and operation, the use of best management practices, which have a history of being able to reduce impacts. And so our task was to identify these types of measures which should be incorporated into future projects and future environmental evaluations of such projects. I won't go into the details, because the important thing for this portion of the meeting, the hearing, is to hear your comments. And so we want to get to that fairly soon here.

I just listed some of the potential mitigation measures that could -- in our opinion, we felt that by using the mitigation measures, which we've identified in the EIS and EIR, we feel that these could very likely reduce the level of impacts to less than significant levels. So that was encouraging as well. Just to let you know, we're in the phase of reviewing the draft. If you haven't had a chance yet to look at the EIR/EIS, I encourage you to do so either.
T-41-1: Comment acknowledged.

- Okay. I wanted to establish a few of the ground rules. First of all, I wanted to let you know that we have Ruben Garcia, who is not only a great court reporter -- I hope he's a great reporter because I'm expecting him to give us great transcripts from these. I know you will, Ruben. He's also a light heavyweight boxer. So he's a good guy in that regard too.
- Anyway, we have about two minutes, we're going to set two minutes per person for your presentations. And so we have about 15 people signed up to make comments.
- And I have set up the microphone on this side, just to confuse everyone. The microphone for the particular commenter would be set up there. And we face it towards the audience so that you can all feel part of what is being talked about. Feel free to turn the microphone whatever direction you're comfortable with.
- And I would like to ask those people who have signed up, if you would please form a queue down that aisle there, then we could minimize the time required. So just head on over there. No particular order. But just keep in mind the two-minute.
- We will have Mary -- and Mary will identify herself there, holding up a yellow sign. Because when you have thirty seconds left, Mary will wave that yellow card so that you can see it. And she'll wave it to me so I can see it. And when you have no time left, it will be this rose-colored card that goes up. And that says, "Please stop and give the next person a chance."
- So I think that's it for the ground rules. And I invite the first commenter. And please state your name and any affiliation that you have or your location for the record as well.

T-41-1: My name is Lewis MacAdams. I'm from Friends of the Los Angeles River. And Friends of the Los Angeles River has commented on this process as it's gone along and we will comment also at the end. But as an organization, we've been extremely supportive of the work that's been accomplished on this thing.

I know that in public meetings it's inevitable that many people have complaints, some that they just discovered the process. Some like Brady Westwater in downtown, which is a very valid discussion, the native plant issues and all those kinds of issues are really important too, obviously.

But I would just like to take this moment really. I was talking to Tim Brick, who has been in the water game for longer than I have, longer than probably anybody in this room, but Dorothy Green, and we were saying what an incredible accomplishment this has been. And I just wanted on behalf of our organization, to thank you guys, and women and men, for the work that you've done. It's absolutely thrilling, and we look forward to seeing some of these projects actually be accomplished in our lifetimes.
Public Comments and Responses

Comments

T-42-1: The PEIR/PEIS team and the City acknowledge that changes in land use discussed at the concept level in the LARRMP would be inconsistent with local community plans. It was decided that indicating at this programmatic level that such inconsistency could constitute potentially significant impacts would call attention to the need for conducting appropriate and sufficient community-based planning and interaction as future projects are identified in specific communities.

T-42-2: The PEIR/PEIS team and the City acknowledge that increases in the use of existing parks would have beneficial aspects. However, it was felt that attention should be called to the increased demand that such increases could place on local and area roadways, parking, public safety, and emergency services. These increases may require that appropriate mitigation measures are incorporated into future projects to alleviate potential adverse impacts.

T-42-3: Comment acknowledged. In the Final PEIR/PEIS, language based on your comment will be added to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor and in the opportunity areas.

T-42-4: Comment acknowledged.

Responses

T-42-1: The PEIR/PEIS team and the City acknowledge that changes in land use discussed at the concept level in the LARRMP would be inconsistent with local community plans. It was decided that indicating at this programmatic level that such inconsistency could constitute potentially significant impacts would call attention to the need for conducting appropriate and sufficient community-based planning and interaction as future projects are identified in specific communities.

T-42-2: The PEIR/PEIS team and the City acknowledge that increases in the use of existing parks would have beneficial aspects. However, it was felt that attention should be called to the increased demand that such increases could place on local and area roadways, parking, public safety, and emergency services. These increases may require that appropriate mitigation measures are incorporated into future projects to alleviate potential adverse impacts.

T-42-3: Comment acknowledged. In the Final PEIR/PEIS, language based on your comment will be added to Section 4.11.2.1 (General Types of Impacts and Mitigation) regarding potential HTRW in the River Corridor and in the opportunity areas.

T-42-4: Comment acknowledged.

T-43-1: The project area has already registered raises in land prices and has put a strain on the affordable housing and small business sectors. The LARRMP recognizes the need to update existing Community Plans in river-adjacent areas through an extensive and inclusive community involvement process to ensure that LARRMP benefits are as equitably distributed as possible. That Community Plan update process will enable assessment of impacts on housing, loss of affordable housing, jobs, as well as on issues related to zoning modifications, gentrification, and preservation of...
Comments

T-43-1 (cont.): community standards in terms of community stability and makeup. This is a stakeholder driven process that is best suitable to gauge community support. The overall policy of the Plan is to encourage the retention and strengthening of stable residential areas, and to balance this with a long-term program to acquire properties for flood protection and river improvement.

Responses

T-44-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-44-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-44-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-44-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-44-5: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
Public Comments and Responses

**Comments**

T-44-5: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. (The LARRMP’s recommended three-tiered governance structure, should it be established, would be an administrative action and is therefore not addressed in the PEIR/PEIS.)

T-45-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-45-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-45-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team.

**Responses**

T-45-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City. (The LARRMP’s recommended three-tiered governance structure, should it be established, would be an administrative action and is therefore not addressed in the PEIR/PEIS.)

T-45-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-45-3: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-45-4: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team.

T-46-1: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.
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T-46-2: Your comment is more related to the LARRMP than to the PEIR/PEIS. Your comment has been passed on to the LARRMP planning team and the City.

T-46-3: Millions of people currently live and work within the historic flood plain of the Los Angeles River. Prohibiting development in this area would displace many people and jobs.

The Pueblo Lake concept was an in-channel concept, within the existing concrete channel; the rubber dams proposed in this area are for the development of the diversion channel near Chinatown-Cornfields.

Comments on Pueblo Lake were specific to that proposal; additional comments on the rubber dams proposed within the Revitalization Master Plan may be provided when/if rubber dam projects become implemented, as part of a more focused, non-programmatic CEQA/NEPA process.

T-47-1: Comment acknowledged.

T-47-2: Comment acknowledged.

T-47-3: Comment acknowledged.
Comments

T-47-3
23 of a teaser for the high-end development to come in and
24 say, 'Look, we've got this beautiful area in this formerly
25 blighted area. Sink some money in here. We'll all get
26 rich.' But it's not taking into consideration the rest of
27 the river and what could be done with it.
28 I guess that pretty much covers it. I think. And I think that you should reach out to colleges, high
29 schools, the public at large for more ideas, more input,
30 of what some innovative ideas might be to put in there.
31 And I think transportation could be incorporated into the
32 river and make it a useful thing as well as an aesthetic
33 improvement.
34 MR. BROADFOOT: Thank you for your comments.
35 MR. FRANCO: Ray Franco. I'm president of Studio
36 City Improvement Association. I also represent two of the
37 major property owners along the river, two of the sites
38 that are considered in the plan. My understanding is this
39 is strictly a hearing on the EIR. It's not a hearing on
40 the project itself.
41 The fault that I find with the EIR is that it
42 really treats land use as just one of the considerations,
43 when in fact land use, as you've heard from some of the
44 other people, is the primary consideration.
45 So I don't think that we can really study and
46 have a good EIR without really specifying the land use
47 first and then seeing all the derivatives that come from
48 that. Thank you.
49 MR. BROADFOOT: Thank you.
50
51 Anyone else wishing to make comments orally for
52 the record? Okay. Then let me close this official
53 hearing of the oral comments -- Oh, yes.
54 MS. WINTER: If you had 15 people sign up and an hour
55 for public comment, why did you limit it to two minutes
56 per comment?
57 MR. BROADFOOT: Good question. Is there some other
58 question behind your question? Would you like more time?
59 We just had to choose a number and two seemed like a good
60 number.
61 UNIDENTIFIED SPEAKER: Two minutes is sufficient.
62 MR. BROADFOOT: Two minutes is sufficient this man
63 says.
64 Anyone else wishing to make any further comment?
65 You can get back up and make additional comment, if you
66 like, if that's necessary. I also was going to, again,
67 urge you to fill out the comment forms or send a letter
68 in.
69 MS. WINTER: Just one comment. I just want to make
70 sure if I forget again, I know that the Pueblo Lake and
71 rubber dams are part of this plan, and I would request
72 that the public comments that went out on the specific
73 Pueblo Lake rubber dam project, because this is much more
74 vague. It just talks about rubber dams a lot, and let's do
75 them. There was a public comment period on the Pueblo
76 Lake. I would request strongly that those public comments
77 be included in this plan as comments on the dam concept in
78 that particular part of the river as it has nothing to do
79 with the river's ecosystem function.
80 So I would just request that every public
81 comment made on Pueblo Lake be included as public comment
82 on this EIR relative to any kind of rubber dam for that

Responses

T-47-4: Comment acknowledged.

T-48-1: Comment acknowledged. See also response to Comment O-
6-1.
MR. BROADFOOT: Thank you for that.
Any additional comments? Well, unless Gary wants to say anything, I will just say thank you everyone for coming tonight and for participating. And we will take your comments and respond to them and incorporate them into the final EIR/EIS. Thank you so much.
(Public Hearing adjourned at 8:47 p.m.)