

APPENDIX B:
NOP COMMENT LETTERS

Public Agencies

DEPARTMENT OF TRANSPORTATION

DISTRICT 7-OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-6536

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March 10, 2017

RECEIVED
CITY OF LOS ANGELES**MAR 17 2017**MAJOR PROJECTS
UNIT

Mr. Jon Chang
Major Projects and Environmental Analysis Section
City of Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Bow Tie Lofts Project
Vic: LA-2/PM 15.794
SCH#2017021051
GTS#07-LA-2017-00638ME-NOP

Dear Mr. Chang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Applicant proposes the development of a mixed-use project, consisting of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. The 5.7-acre Project Site is located at the terminus of Casitas Avenue in Glassell Park in Northeast Los Angeles.

Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by eliminating consideration of delay- and capacity- based metrics such as level of service (LOS) and instead focusing analysis on another metric of impact. The Governor's Office of Planning and Research (OPR) is currently updating its CEQA Guidelines to implement SB 743 (https://www.opr.ca.gov/s_sb743.php) and is proposing that vehicle miles traveled be the primary metric used in identifying transportation impacts.

The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA if VMT methodology is used:

https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

If the City decides to use Level of Service (LOS) when preparing the traffic analysis on the State facilities, please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

To assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are elements of what is generally expected in the traffic study:

1. Key intersections and any traffic impact including, but not limited to SR-2.

2. Traffic volume counts to include anticipated AM and PM peak-hour volumes.
3. Level of service (LOS) before and during construction.
4. A brief traffic discussion showing ingress/egress, turning movements, and the directional flow of project vehicle trips.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. If you would like to expedite the review process or receive early feedback from Caltrans, please feel free to send a copy of the DEIR directly to our office.

If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00638ME.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED
CITY OF LOS ANGELES

MAY 04 2017

**MAJOR PROJECTS
UNIT**

DATE: April 20, 2017

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Jonathan Chang, Planning Assistant
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation



SUBJECT: BOW TIE YARD LOFTS PROJECT – NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

This is in response to your February 16, 2017 letter requesting a review of your proposed mixed-use project located at 2750 – 2800 W. Casitas Avenue, Los Angeles, CA 90039. The proposed project consists of a residential apartment, swimming pool and spa, restaurant, office, commercial use, and urban farm. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Existing</i>			
Manufacturing Space	0.096 GPD/SQ. FT	87,000 SQ. FT	(8,352)
Warehouse	0.024 GPD/SQ. FT	25,000 SQ. FT	(600)
Production Space	0.096 GPD/SQ. FT	5,000 SQ. FT	(480)
<i>Proposed</i>			
Residential: APT- Bachelor	75 GPD	110 UNITS	8,250
Residential: APT- 1 BDRM	110 GPD	220 UNITS	24,200
Residential: APT- 2 BDRM	150 GPD	80 UNITS	12,000
Swimming Pool & Spa	7.78 GPD/ CU. FT	5,056 SQ.FT	39,336
Restaurant	30 GPD/SEAT	133 SEATS	3,990
Office	120 GPD/1000 SQ. FT	39,600 SQ. FT	4,752
Commercial Use	50 GPD/1000 SQ. FT	10,700 SQ. FT	535
Urban Farm	1	100,000 GAL/MONTH	100,000
Total			183,631

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Casitas Avenue. The sewage from the existing 8-inch line feeds into a 36-inch line on Gilroy St. R/W before discharging into a 48-inch sewer line on Blake Avenue. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch, 36-inch, and 48-inch lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Casitas Ave	*	676,405 GPD
15	Fletcher Dr	42	866,833 GPD
48	Fletcher Dr	*	24.76 MGD
36	Gilroy St R/W	*	93.87 MGD
48	Gilroy St R/W	61	22.81 MGD
48	Blake Ave	58	21.98 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled *“Development Best Management Practices Handbook – Part B: Planning Activities”*. Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD’s plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Floor, Station 18.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as

recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection “3”.

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

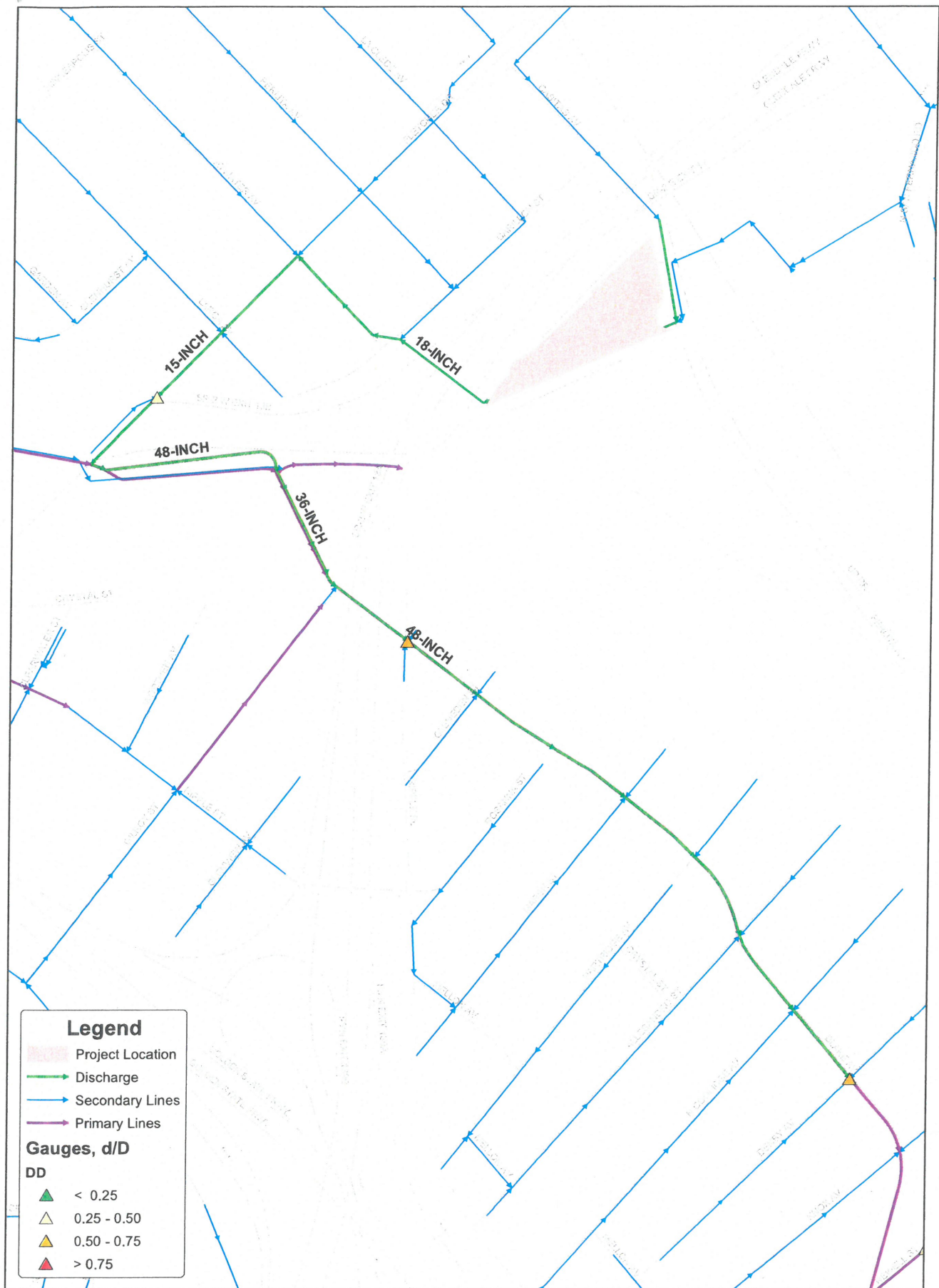
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

EP/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN



Wastewater Engineering Services Division
LA Sanitation
City of Los Angeles



Figure 1
Bow Tie Yard
Lofts Project
Sewer Map



0 95 190 380 570 760
Feet



Jonathan Chang <jonathan.chang@lacity.org>

RFI: Bow Tie Yard Lofts Project - NOP EIR and Public Scoping Meeting

Yvaine Valenzuela <yvaine.valenzuela@lacity.org>

Thu, Feb 16, 2017 at 12:28 PM

To: Jonathan Chang <jonathan.chang@lacity.org>

Cc: Eduardo Perez <eduardo.perez@lacity.org>

Hello Jon Chang,

We received the CEQA - Notice of Preparation of Environmental Impact Report and Public Scoping Meeting for 2750-2800 W. Casitas Avenue, LA, CA 90039.

In order to continue the analysis for the application, please provide the following for further clarification:

Existing:

It is indicated that the existing facility includes a light manufacturing/warehouse/film production. Could you please clarify the following:

1] Is the manufacturing facility an industrial? If so, how many gallons of water per day is being used? If it is not an industrial, what is the area?

2] Does the warehouse have an office? If so, how many gallons of water per day is being used? If it does not have an office, what is the area of the warehouse?

3] Is the film production an industrial or a retail? If it is an industrial, how many gallons of water per day is being used? if it is a retail, what is the area of the film production?

Proposed:

1] Could you please clarify if the proposed project is an apartment, condo, or a duplex/townhouse?

2] Will the proposed building have a swimming pool? If so, what is the backwash filter rate or what is the volume/dimensions of the pool?

3] Will the proposed building have a gymnasium (i.e., basketball, weight room)? If so, what is the area?

4] Will the restaurant be an indoor or outdoor? How many seats will it have?

5] Will the office space have a cooling tower? What is the area?

6] Will the urban farm/greenhouse require any discharge? How many gallons of water per day will it generate?

7] Is the 42,000 square feet the whole commercial use or will that area be for the urban farm?

Once these information are received, we will continue the process.

Thank you for your time,

Yvaine Valenzuela

City of Los Angeles - LA Sanitation

Wastewater Engineering Services Division

Email: yvaine.valenzuela@lacity.org



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Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a
_____, for themselves, their heirs, administrators, executors,
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public
agency existing under the authority of the laws of the State of California ("Grantee"), its
successors and assigns, for the use and benefit of the public and its employees, a perpetual,
assignable easement in that certain real property in the City of Los Angeles, County of Los
Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by
this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property
having the same boundaries as the described Property and extending from the sub-
surface upwards to the limits of the atmosphere of the earth, the right to cause in said
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic
disturbances, and all other effects that may be caused or may have been caused by
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit
or action of any purpose, including or not limited to, property damage or personal
injuries, against Grantee, its successors and assigns, for any necessary operating and
maintenance activities and changes related to the Project which may conflict with
Grantors' use of Grantors' property for residential and other purposes, and Grantors
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or
develop the Property for any permitted use. However, Grantor's rights of development shall
not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20____

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of _____)

On _____ before me, _____,

Date

Here Insert Name and Title of the Officer

personally appeared _____

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

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Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- ☐ Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- ☐ Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- ☐ Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- ☐ All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- ☐ If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- ☐ Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- ☐ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- ☐ The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- ☐ The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ☐ Evidence that affected transit operators received the Notice of Preparation.
- ☐ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- ☐ Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- ☐ Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- ☐ Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- ☐ Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- ☐ Any project contribution to the improvement, and
- ☐ The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

March 13, 2017

**Jon Chang, Planning Assistant
Major Projects and Environmental Analysis Section
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012**

RE: Bow Tie Yard Lofts – Notice of Preparation of Environmental Impact Report

Dear Mr. Chang:

Thank you for the opportunity to comment on the proposed Bow Tie Yard Lofts project (Project) located at 2750-2800 W. Casitas Ave. in the City of Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The applicant proposes the development of a mixed-use project in the Northeast Los Angeles Community Plan area that would consist of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. Existing on-site uses, including a light manufacturing/warehouse/film production building (approximately 117,000 square feet) and its associated surface parking, would be demolished as part of the proposed Project.

The proposed residential units would include a combination of 119 studios, 220 one-bedroom units, and 80 two-bedroom units in four buildings ranging from five to six stories (60-81 feet above grade). Eleven percent of the base-density residential units (approximately 35 units) would be reserved as Very Low-Income Units. Commercial uses on site may include a mix of restaurant uses, office space, and an approximate 42,000 square-foot urban farm. A seven-story (85 feet above grade) parking garage on the northwest end of the Project site would provide 720 on-site parking spaces on levels one through six. The seventh level of the parking structure would include an urban farm/greenhouse. The proposed

Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. Open spaces and recreational amenities would include approximately 58,176 square feet.

Metro Comments

Metrolink Adjacency

It is noted that the eastern boundary of the project site is in close proximity to a Metro-owned Railroad Right-of-Way (ROW) separated by Kerr Street. This ROW is operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run the Metrolink commuter rail service, Amtrak intercity passenger trains and Union Pacific Railroad freight trains also operate on this line. The following concerns related to the project's proximity to the ROW should be addressed:

1. The project sponsor is advised that rail service operates in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the proposed project.
2. Considering the proximity of the proposed project to the railroad ROW, trains will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of Metro is required, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants, as well. In addition, any noise, vibration and air quality mitigations required for the project will be borne by the developers of the project and not Metro or the operating railroads.
3. The Project sponsor will be required to notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW.

Active Transportation

Metro encourages the City to work with the applicant to promote bicycle use through adequate secure long-term bicycle parking for residents and employees. Additionally, the City is encouraged to work with the applicant to ensure safe and convenient connections for people walking or riding bicycles to/from the Project site, transit stations, and/or bikeway facilities such as Los Angeles River Greenway Trail. The applicant should also ensure that wayfinding signage for pedestrians, people riding bicycles, and transit users provides information such as nearby destinations, transit stops, bike facilities, etc.

Congestion Management Program

Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

**Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952**

Sincerely,



Elizabeth Carvajal
Sr. Manager, Transportation Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
Noise Easement Deed

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



February 24, 2017

Jonathan Chang
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Sent via Email to: Jonathan.Chang@lacity.org

Re: SCH# 2017021051, Bow Tie Yard Lofts Project, Los Angeles County.

Dear Mr. Chang:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) prepared for the project referenced above.

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources", that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁵ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁶ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at katy.sanchez@nahc.ca.gov or call (916) 373-3712, if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Katy Sanchez'.

Katy Sanchez
Associate Environmental Planner

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project,⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program,** if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- There is no Statutory Time Limit on Tribal Consultation under the law.
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

Jonathan.Chang@lacity.org

Jon Chang, Planning Assistant
Major Projects and Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

March 3, 2017

Notice of Preparation of an Environmental Impact Report for the Bow Tie Yard Lofts Project (Case Number: ENV-2016-2826-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Environmental Impact Report (EIR). Please send the SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)).

SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for

performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the proposed project and all air pollutant sources related to the proposed project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD’s CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC170221-02
Control Number



DEPARTMENT OF PARKS AND RECREATION

Angeles District

1925 Las Virgenes Road

Calabasas, CA 91302

Lisa Ann L. Mangat, Director

March 13, 2017

Jon Chang, Planning Assistant
Major Projects and Environmental Analysis Section
City of Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Initial Study and Notice of Preparation for Bow Tie Yard Lofts Project (Case Number ENV-2016-2862-EIR)

Dear Mr. Chang:

California State Parks, Angeles District, has reviewed the Initial Study and Notice of Preparation for the Bow Tie Yard Lofts Project and would like to provide the following comments:

3. Environmental Setting (Page A-8):

The Bowtie parcel should be described as “open space” rather than “vacant land.” The parcel is part of the 57 acre Rio de Los Angeles State Park, which includes the 17 acre Bowtie parcel and the nearby 40 acre parcel on San Fernando Road. A General Plan for Rio de Los Angeles State Park was completed in 2005.

A key consideration when California State Parks purchased the 57 acres along the Los Angeles River was the potential to restore one of the largest undeveloped contiguous parcels along the Los Angeles River. California State Parks is committed to increasing wildlife habitat, open space, flood storage, and recreational space in one of the nation’s most park-deficient urban regions—metropolitan Los Angeles.

We would also like to point out that the Plains All American Pipeline operates a crude oil pipeline through the Bowtie Parcel in close proximity to this proposed mixed use development.

Conceptual Plant Palette (Figure 7, 8): The conceptual plant palette includes plants that are not native to the Los Angeles River. All landscape plants should be native plants appropriate for riparian upland habitats, and grown from locally-collected seeds. The non-native plants listed in the conceptual plant palette can become harmful invasive plants in the adjacent Los Angeles River riparian habitat and the State Park.

I. Aesthetics (Page B-2)

Response c: The development's height will increase its impact on views from the California State Park Bowtie parcel and the Los Angeles River. Alternatives that minimize this impact should be considered.

Response d: Options for night lighting that reduce the impact on the State Park Bowtie parcel and the Los Angeles River should be considered. See Biological Resources below.

IV. Biological Resources (Page B-6, Response b)

A more thorough review of wildlife habitat within the adjacent Los Angeles River is needed. At this location the Los Angeles River, although channelized, has a soft bottom with riparian habitat that provides valuable wildlife habitat. Native trees and habitat, and native wildlife are present along this stretch of the river. Bats are present in this area, and are sensitive to habitat changes such as fragmentation and changes in land use. The Los Angeles River is within the Pacific Flyway, an important migratory route for birds. Upland sites adjacent to the river provide vital habitat for wildlife. The Bowtie parcel and Los Angeles River provide wildlife linkages to nearby and larger regional habitat areas, which increase the survival of native wildlife.

The impact of high density development is greater than that of light manufacturing. The study should address the impact of increased density, noise, and night lighting on wildlife. Noise and light sources can disorient nocturnal wildlife and act as a barrier to movement. The proposed development should consider a setback from the river and the State Park to create a buffer between the dense development and the habitat. Options to buffer impacts of night lighting along these boundaries should also be considered.

V. Cultural Resources

Page B-8, Response b – The correct term is “unconsolidated fill material” not “undocumented.”

Page B-24, first full paragraph – The correct term is “unconsolidated fill material” not “undocumented.”

Page B-9, MM A-1 – The SOPA organization disbanded several years ago. The correct designation is Register of Professional Archaeologist (RPA).

Page B-10, Response d – The correct term is “interment” or “burial” sites, not “internment sites.”

VIII. Hazards and Hazardous Materials (Page B-12, response a-d)

The project site is adjacent to the Bowtie parcel, which has been identified as a Brownfield site by the Department of Toxic Substances Control (DTSC). Any development plans should not impact future remediation efforts at the Bowtie parcel.

X. Land Use and Planning (Page B-17)

The EIR should address prior planning documents for the Los Angeles River (Los Angeles River Revitalization Master Plan; Water Supply and Habitat Resiliency for a Future Los Angeles River, Rio de Los Angeles State Park General Plan) to ensure consistency with these plans. For example, one plan recommendation is that the landscaping and hydrology of the river adjacent sites should be designed to provide a value-added role to the habitat functions of the Los Angeles River ecosystem.

XIV: Public Services (Page B-22, Parks)

California State Parks purchased two parcels, totaling 57 acres on the Los Angeles River to restore natural resources and to provide much-needed open space in the nation's most park-deficient urban regions—metropolitan Los Angeles. Prior to the purchase, the area surrounding Rio de Los Angeles State Park provided less than 1.3 acres of public open space per 1,000 residents, well below the City of Los Angeles objective to provide 4 acres per 1,000 residents (Rio de Los Angeles General Plan 2005), and significantly below the 6.25 to 10.5 acres per 1,000 people recommendation from the National Recreation and Park Association (Rio de Los Angeles General Plan 2005). The increased density from the proposed development would impact the State Parks, and Quimby Fees would not provide assistance to State Parks.

XV. Recreation (Pages B-22-23)

See Public Services comment above.

XVII. Tribal Cultural Resources (Pages B-26 and B-27, Response b)

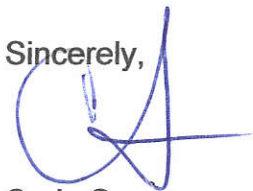
Under AB52, a list of appropriate tribal contacts should be requested from the California Native American Heritage Commission. This would provide a much more comprehensive list than the three groups mentioned. It should also be noted that the Soboba Band of Luiseno Indians have a tribal interest area in Riverside County in the vicinity of Hemet, so it is unclear why they were contacted for a project located in central Los Angeles.

Records search and tribal consultation documents refer to Appendix B, but this appendix was not provided for this review.

XIX. Mandatory Findings of Significance (Page B-29)

In addition to the potential significant impacts listed as mandatory findings of significance (aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services; transportation/circulation; and utilities), the EIR should analyze impacts to parks and biological resources due to the project's location adjacent to the Los Angeles River and Rio de Los Angeles State Park.

Sincerely,



Craig Sap
Angeles District Superintendent

Organizations



Jonathon Chang,
City Planning Department
Room 750 Metropolitan Projects
City Hall, 200 N. Spring Street
Los Angeles, CA 90012

RE: Initial Study and Notice of Preparation for Bow Tie Yard Lofts Project (Case # ENV-2016-2862-EIR)

Dear Mr. Chang,

Friends of the Los Angeles River (FoLAR) and Clockshop, two community-based nonprofit organizations located in the Elysian Valley, have reviewed the Initial Study and Notice of Preparation for the Bow Tie Yard Lofts Project and would like to provide the following comments. In addition to the specific comments outlined below, we believe that the developers of the proposed project need to take the ARBOR Study and Los Angeles River Revitalization Master Plan into serious consideration. The project should not hinder implementation of either of these plans.

3. Environmental Setting (Page A-8):

The Bowtie parcel immediately adjacent to the proposed project site should be described as “open space” not “vacant land.” The parcel is part of the 57 acre Rio de Los Angeles State Park, which includes the 17-acre Bowtie parcel. A General Plan for Rio de Los Angeles State Park was completed in 2005.

In addition, the Bowtie parcel and the neighboring G2 parcel, recently purchased by the City of Los Angeles, are key opportunity sites for the Los Angeles River Ecosystem Restoration Study (a.k.a. ARBOR) adopted by the US Army Corps of Engineers and the City of Los Angeles in 2016. The proposed site for the Bow Tie Yard Lofts are also within this study area.

I. Aesthetics (Page B-2)

The proposed development’s height will increase its impact on view sheds to the Los Angeles River and California State Park’s Bowtie parcel. Alternatives that minimize this impact should be considered.

IV. Biological Resources (Page B-6)

A more thorough review of wildlife habitat within the adjacent Los Angeles River is needed. At this location the Los Angeles River has a soft bottom and thus is home to unique riparian habitat. The ARBOR study as referenced above, proposes extensive wetland and open space restoration on parcels such as the adjacent G-2 and Bowtie, as well as in-channel restorative efforts. The impact of high density development is greater than that of light manufacturing. The study should address the impact of increased density, noise, night lighting, and day shading patterns on wildlife. The proposed development

should consider a setback from the River to provide a buffer from wildlife, as well as to promote public access and recreation in and along the River.

X. Land Use and Planning (Page B-17)

The EIR should address prior planning documents for the Los Angeles River, including the Los Angeles River Revitalization Master Plan, Alternative 20 of the Los Angeles River Ecosystem Restoration Study (ARBOR), and the Rio de Los Angeles State Park General Plan. The proposed project should not impede the implementation of any of these plans. In addition, the City of Los Angeles' River Improvement Overlay ordinance should be adhered to.

XIV. Public Service (Page B-22) And XV. Recreation (Pages B-22-23)

One of Friends of the Los Angeles River's and Clockshop's primary interests is in providing public access, engagement and recreation in, around and to the Los Angeles River. The proposed project's location is in one of the nation's most park-deficient urban regions and runs the risk of impacting ease of public access to the River and surrounding park lands. The plans to create open space, reclaim floodplains and restore wetland habitat in the adjacent Los Angeles River and on the Rio de Los Angeles State Park parcels and G2 parcels strive to correct this historic problem. The existing Rio de Los Angeles State Park provides 1.3 acres of public open space per 1,000 residents, well below the City of Los Angeles' objective to provide 4 acres per 1,000 residents. The increased density from the proposed development would impact the ratio of provided open space.

We request the consideration of all concerns above for the community, the River and the future of open space in Los Angeles.

Sincerely,



Marissa Christiansen
Executive Director, FoLAR



Julia Meltzer
Founder, Clockshop

About Clockshop:

Clockshop is a non-profit arts organization located in Elysian Valley, across the river from the Bowtie site. For the last three years we have been working in partnership with California State Parks to bring cultural and environmental programming to the Bowtie. We have done over 35 programs at the Bowtie and have brought thousands of visitors to the site to learn about the LA River and this 18-acre piece of land that will eventually become a public park.

About Friends of the Los Angeles River:

Friends of the Los Angeles River was founded in 1986 by one Lewis MacAdams to bring the River to the people and the people to the River. Our mission is to ensure a publicly accessible, recreational and ecologically sustainable Los Angeles River by inspiring River stewardship through community engagement, education, advocacy, and thought leadership.



135 W Green St
Suite 200
Pasadena, CA
91105
t: 323.223.0441
f: 626.204.4444
tpl.org

March 17, 2017

Dear Mr. Chang,

In reference to file # ENV-2016-2862-EIR, the proposed Bow Tie Yard Lofts Project in northeast Los Angeles, The Trust for Public Land writes to urge the City to include in its Environmental Impact Report ("EIR") adequate studies and analyses of potential environmental impacts, given its location along the Los Angeles River and the scope of the planned development. In reviewing the initial study, it seems that several areas need greater attention in regards to their environmental impact to the project site and surrounding area, greenhouse gas emissions, and the impacts to the Los Angeles River.

The site is located on a unique section of the Los Angeles River in that the river bottom in that area is not fully paved. This "soft bottom" characteristic has allowed for establishment of riparian vegetation. Because the site is near several other open space projects, this could be leveraged to further habitat enhancement. These factors are not addressed in the initial study and should be accounted for in the EIR. Finally, in light of the proposed project's location on the Los Angeles River, the City should consider the addition of an access easement on the site if the project is approved to allow for continued cultivation of the Los Angeles River as an accessible ecosystem, permitting continued bike path development and promoting stewardship.

Thank you for your attention.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tori Kjer", with a long, sweeping horizontal line extending to the right.

Tori Kjer
Los Angeles Program Director
The Trust for Public Land

Individuals

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Transportation
- Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

AESTHETICS: THIS PROJECT WILL BE HIGHER THAN 2 FREEWAY. VIEWS WILL BE GREATLY IMPACTED.

BIOLOGICAL: WITH THE RIVER UNDERGOING RESTORATION, THIS PROJECT WILL IMPACT

HABITAT ON BOUNTIE STATE PARK / MIGRATORY CORRIDOR / RIPARIAN FAUNA & FLORA. THIS

WILL ADVERSELY EFFECT ESTABLISHED NATIVE & MIGRATORY ANIMALS. HOW DOES THIS

PROJECT CONFLICT WITH CITY & STATE PLANS?

CULTURAL RESOURCES: NEED FULL STUDY TO AVOID SERIOUS IMPACT ON ARCHAEOLOGICAL SITE

HAZARDOUS MATERIALS: EXISTING BUSINESS HAVE USED HAZARDOUS MATERIALS, NOTED RESIDENTS

WILL IMPACT WATER USE & SEWAGE

WATER QUALITY: SITE IS A DRAINFIELD, I AM CONCERNED ABOUT WATER FUSHING INTO RIVER

& EXCEEDING CAPACITY OF STORM WATER DRAINAGE SYSTEMS. THIS PARCELS ARE IN 100 YR. FLOOD PLAIN

LAND USE & PLANNING: PROJECT WILL ADD PERHAPS 1,000 RESIDENTS & VEHICLES TO A SMALL

COMMUNITY WITH EQUALLY SMALL INFRASTRUCTURE WITH ONLY ONE ACCESS POINT!

TRAFFIC: PROJECT WILL WREAK HAVOC IN THE RESIDENTIAL STREET BETWEEN FLETCHER & DRIVEWAY INTO PROJECT.

CONTACT INFORMATION (Optional, please print clearly)

Name: _____

Representing Agency or Organization: _____

Address: _____

City/State/Zip: _____

THIS COMMUNITY HAS FOUGHT LONG & HARD TO BRING BACK OUR RIVER, THIS PROJECT IS HAZARDOUS TO THE RIVER. THE PARCEL SHOULD BE PARKING & AMENITIES FOR THE NEAR PARK.

2018

ENVIRONMENTAL ISSUES & IMPACTS

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- Public Services
- Recreation
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- Utilities/Service Systems

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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

This project seems way too dense
for the area and for Fletcher.
Will there be public access to the
rest of the Bowtie area?
Is there room in the local schools
for the children?

CONTACT INFORMATION (Optional, please print clearly)

Name: Dana Ross Representing Agency or Organization: —
Address: 2735 Ave 33 City/State/Zip: LA 90065

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Traffic: I live at 3030 La Ciede Ave in between Fletcher and Carillon. My main concern is that all the traffic from the 419 units will be driving down my street. I have a 1yr old baby and a 3yr old toddler. My toddler will be starting school in 1.5yrs and I am concerned for her safety and my family's safety if cars from 419 units will be driving down our street. It is already congested @ 3pm when employees from the warehouse nearby are done w/ work and they drive down La Ciede really fast. I cannot even imagine all the traffic and congestion from 419 units. I would be interested to see what kind of solution you come up w/ regarding traffic in the area. San Fernando/Fletcher is already extremely trafficky. And so is Fletcher and Glendale Blvd.

CONTACT INFORMATION (Optional, please print clearly)

Name: Mong Skillman

Representing Agency or Organization: _____

Address: 3030 La Ciede Ave.

City/State/Zip: LA, CA 90039

mongskillman@gmail.com

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
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- Recreation
- Traffic/Transportation
- Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

REGARDING THE URBAN FARM / GREENHOUSE
ON TOP OF THE GARAGE, ASIDE FROM
CONSIDERATION PERTAINING TO WATER
USE, THESE WILL NOT BE IN NEW YORK,
CHICAGO OR THE MIDWEST, BUT CALIFORNIA.
WE HAVE HIGH TEMPERATURES MOST OF
THE YEAR. THE TOP OF THE GARAGE AS
A GREENHOUSE SHOULD BE TESTED FIRST
TO DETERMINE IF SUCH A PROJECT IS
FEASIBLE.

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

~~THE~~ AESTHETICS, PLEASE PUT TWO COMMENTS.
WOULD LIKE GREEN SPACE FOR RESIDENTS
FOR INDIVIDUAL USE
TRAFFIC AND TRANSPORTATION ARE DEFINITE
ISSUES TO ADDRESS

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

ENVIRONMENTAL ISSUES & IMPACTS

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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Aesthetics: The more art + on-building greenery, the better. I want the buildings to look like an extension of the river, NO single color/material facades.

Transportation: I foresee the single point of access being a HUGE problem. Possible to have a second route?

Public Services: Strongly ~~encourage~~ encourage you to incorporate access to the Bow Tie Park. It would be a shame to block it off.

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Project looks good, I like that the residents will have their private space, while the project provides an open environment. The use of the top of the parking structure as a greenhouse is a great idea. Tying the development to a future park and the river will improve the area. Improvements to consider would be to make the bike paths extend to the metro link station on one end and the metro station on the other. This will reduce the need for people to have to travel by car. Good luck!

CONTACT INFORMATION (Optional, please print clearly)

Name: Mario Padilla Representing Agency or Organization: Neighbor
Address: 3760 Aguilon St City/State/Zip: L.A. CA 90065

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
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- Traffic/Transportation
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Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

1) REGARDING THE URBAN FARM, WILL TENANTS IF THEY SO DESIRE, HAVE A SECTION RESERVED FOR THEM TO DO THEIR OWN GARDENING.

2) IF THE URBAN GARDEN IS TO BE A COMMERCIAL VENTURE, HAS CONSIDERATION BEEN GIVEN TO THE ADDITIONAL TRAFFIC & CONGESTION IT WILL CREATE FOR THE DELIVERY OF SUPPLIES FOR THE FARM ALSO THE COLLECTION OF THE CROP FOR DISTRIBUTION

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

FOLAR is strongly interested in the opportunities/impacts this project could have to the broader effort to remove concrete from the Los Angeles River while maintaining appropriate flood control protection.

We look forward to engaging in a discussion regarding this issue.

CONTACT INFORMATION (Optional, please print clearly)

Name: Stephen Mejía Representing Agency or Organization: FOLAR
Address: 570 W Ave 26, LA 90065 City/State/Zip: Los Angeles

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

I'm concerned about how this project fits into the overall plan for the river.

How closely do the river project people and this project work together?

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
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- Air Quality
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

No notification occurred. this scope meeting is not publicly known. I know about this meeting only because I am deeply involved with land use issues. People who live nearest to the project do not seem to have been notified. I have met with people who ~~did~~ did not know of this meeting.

CONTACT INFORMATION (Optional, please print clearly)

Name: Alex Ventura
Address: 4111 Chevy Chase Dr.
Representing Agency or Organization: 90039 Director village
City/State/Zip:

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
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- Traffic/Transportation
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Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

INSUFFICIENT ROADS FROM FLETCHER TO PROJECT.
2 FWY POLLUTION WILL IMPACT RESIDENT HEALTH.
NOISE + AIR POLLUTION FROM NEARBY TRAINS.
PARKING STRUCTURE 7 STORIES TOO HIGH.
TOO MANY UNITS, TOO DENSE FOR AREA.
PLEASE COMPARE TO RECENTLY UPDATED FLOOD MAPS USAGE.
CONSTRUCTION OF BOWTIE PARK + TAYLOR YARD PARK
L WILL CREATE TRAFFIC THAT COULD CLASH WITH LOFTS CONSTRUCTION
PLEASE REFERENCE ²⁰¹⁷ STUDY BY THE NATURE CONSERVANCY THAT
SURVEYED LA RIVER ADJACENT TO THIS PARCEL
PLEASE REFERENCE LA RIVER ECOSYSTEM RESTORATION
FEASIBILITY STUDY FOR INDEX OF RESEARCH SOURCES.

CONTACT INFORMATION (Optional, please print clearly)

Name: K. FLORES

Representing Agency or Organization:

Address:

City/State/Zip:

BURBANK, CA 91505

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
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- Geology/Soils
- Greenhouse Gas Emissions
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Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

ugly boxy architecture, affordable housing only 11%, solar on buildings? solar H2O generated? greenhouse on roof? pay to use greenhouse? Can Sota M. school use greenhouse for free/disco/covered rate? 12 or more ed. opportunities (Gotham Greens) how to prevent toxins on produce next to freeway, love the park without walls plan, love restaurant part related plans. parking structure is ugly, like that I can roller skate on bike path, Natural Calif landscape? diving board on pool? 419 units (700 parking spaces) 119 studios, 221-1 bed rooms + 80-2 bed rooms so residential, public, not enough parking!!! murals + more art spaces, bike community room w/ restroom facilities, pretty short term bike parking land marking, community boards in community room

CONTACT INFORMATION (Optional, please print clearly)

Name: Maricle Rose

Representing Agency or Organization: GP/A G-PNC

Address: 3824 Brilliant Dr.

City/State/Zip: LA 90065

ENVIRONMENTAL ISSUES & IMPACTS

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It is not clear which streets connect to the project. The over-head drawings do not represent the streets connecting to this project. At this scope meeting the public can not know which streets feed the project. None of the Posters/Displays represent the streets in or out of the project. For a person who may not be familiar with the project, the impression left is that the project is connected to multiple roads. On the Study intersection (4) Poster/Display, it appears that 3 streets connect to the project site. I feel that this is misrepresentation of the project.

CONTACT INFORMATION (Optional, please print clearly)

Name: Alex Ventura Representing Agency or Organization: _____

Address: 4111 Chevy Chase Dr City/State/Zip: 90039, Los Angeles

ENVIRONMENTAL ISSUES & IMPACTS

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Written Comment Form

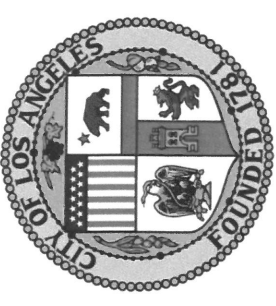
Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

the #4 Study Intersection display, does not indicate that the residential neighborhood streets south of Fletcher are being studied. If these are the only streets connecting to the project site, should they not also be included in the study.

Many trucks and heavy equipment will need to travel down small residential streets. ~~and~~ will the impact of these construction vehicles be included in the study. the roads are currently in disrepair. who will fix the roads when new traffic begins to use it?

CONTACT INFORMATION (Optional, please print clearly)

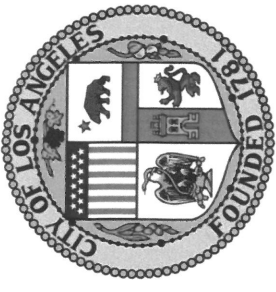
Name: Alex Ventura Representing Agency or Organization:
Address: 9111 Chevy Chase Dr City/State/Zip: Another Village 90039



CITY OF LOS ANGELES
BOW TIE LOFTS PROJECT ENVIRONMENTAL IMPACT REPORT
PUBLIC SCOPING MEETING
CASE NO.: ENV-2016-2862-EIR
MARCH 1, 2017

Please include your mailing address if you wish to receive future notices regarding this case, including publication of the Draft and Final EIR.

Name	Organization (if any)	Address	City, Zip Code	E-mail
K. Flores				Karinflores1@hotmail.com
JERRY SCHWARTZ		3330 SUNNYVALE DR	LA 90039	
Anne Jones		2735 W. Ave 33	LA 90065	viriditasdesigns@gmail.com
Sandra Padilla		3760 Aguilar St	LA 90065	spadilla3760@yahoo.com
Mario Padilla		3760 Aguilar St	LA 90065	mp23306@yahoo.com
Marcie Rose	GPIA GPNC	3824 Brilliant Dr	LA "	831-297-0320
Chris Fleming	FOLAR	5720 Ave 26 Ste 250	LA 90065	ecfleming@folar.org
Doug Dawson				DAWSON917@gmail.com
SANDRA CARAVANT	FRISCO of AFTER V. Village	3116 Palmita Ave	LA 90039	Kunquats@Palmita.com
Cheryl Roberts		3370 Larga Ave.	LA 90039	cherylroberts@gmail.com



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CASE NO.: ENV-2016-2862-EIR
MARCH 1, 2017

Please include your mailing address if you wish to receive future notices regarding this case, including publication of the Draft and Final EIR.

Name	Organization (if any)	Address	City, Zip Code	E-mail
Alex Ventura	AVNC - Atwater Village Chamber of Commerce	4111 Chevy Chase Dr Atwater Village 90039		ventura.mason@yahoo.com
BREND A SCHWETTEL		3330 Sunnybrook Dr 90039	90039	Schwetzel@gmail.com
ANDREA PADILLA	Cal Poly Pomona	3760 Aguilera St.	90065	arpadilla@calpoly.edu
Dana Ross	—	2735 Ave 33 90065	90065	dana@danaross.com
Richard Creso	Homeowners	3629 LAVELL DR	90065	RCRESO2.ROBBERNERS.COM
DAVID QUIJENEREY	"	" "	90065	
Mong Skillman		3030 La Clede Ave. 90039	90039	mongskillman@gmail.com
Ruth Henegger	—	2525 Crestmoore Pl	90065	rhonegger@umaryu.com
Brian Dennison		3562 Eagle Rock Bl	90065	hitch3@gmail.com
Stephan Mejia	FOLAR	570 W Ave 26, LA 90065	90065	smejia@folary



CITY OF LOS ANGELES
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Name	Organization (if any)	Address	City, Zip Code	E-mail
Benjamin Disinger	GPNC			GPNC.BenDisinger@gmail.com
Marge Piane	GPNC/GPIA			gpi-news90065@gmail.com
Carrie Suttin				
Melissa Roth	homeowner	3041 Atwater Ave	LA 90039	medroth@mac.com
BRIAN FITZ	FitzBuckley	3524 CAARISIT AVE	LA 90065	BRIAN@BROKERSTRUST.COM
hawa loop		2043 Cushman Pl	90065	Cooper taggart @earthlink.net

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

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Written Comment Form

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We are a family owned business located on the corner of Fletcher Dr. & Calhede. We have been in business close to 40 years and have noticed the significant changes in the area (especially with traffic). The construction in question will only add more traffic and congestion. There is only one outlet through Calhede onto Fletcher and would absolutely create havoc for all.

CONTACT INFORMATION (Optional, please print clearly)

Name: Armando Amador, Jr. Representing Agency or Organization: _____

Address: 2828 Fletcher Dr. City/State/Zip: L.A. 90039

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Written Comment Form

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1. Utilities - Our infrastructure is seriously failing in the neighborhood. Water mains break, sewers are antique, streets flood because of drainage issues.

2. There are some rare native plants on the Bas Tie Parcel that would be impacted by this development.

CONTACT INFORMATION (Optional, please print clearly)

Name: Arnie Jones

Representing Agency or Organization: SELF

Address: 2735 W. Ave. 33

City/State/Zip: L.A. 90065

ENVIRONMENTAL ISSUES & IMPACTS

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1. Population & Housing - despite the fact that we are in the midst of a housing shortage, this is a large population increase in an area that is very impacted by lack of neighborhood resources. Where are all of these people going to shop for groceries?

2. This project looms over the Brau Tie parcel,

3. ~~TRAFFIC~~ - it's already so bad in this neighborhood, Fletcher Drive is on a read 'diet'. There are huge backups at the intersection of Fletcher Dr. & San Leandro Rd. already. How is adding a MAJOR residential/commercial/industrial project going to make this situation any better? There will only be one way in and out of this site and it goes through a residential neighborhood,

CONTACT INFORMATION (Optional, please print clearly)

Name: AME TONES

Representing Agency or Organization: SELF

Address: 2735 W. Ave. 33

City/State/Zip: LA, CA 90005

ENVIRONMENTAL ISSUES & IMPACTS

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1. Aesthetics - The overall height of the structures/building masses will be approximately 80' above finished grade, -excessive for the neighborhood.
2. Air quality - more cars (more more) to service the 460+ residential units, commercial space & industrial business means more pollution, we already have enough issues in our neighborhood with the 2 & the 5 freeways being so close.
3. Biological resources - We are in the midst of drought despite the rains recently - we don't really have the water resources to service this large of a development.
4. Geology soils - Very close to the river. The water table is highlighted in that area.
5. Land use and Planning - 100 units would be a more reasonable use of this parcel.

CONTACT INFORMATION (Optional, please print clearly)

Name: Alme Jones

Representing Agency or Organization:

Self/Neighborhood resident

Address: 2735 W Ave 33

City/State/Zip: LA CA 90065

Scoping and Initial Study Comments-Bowtie Lofts
2750-2800 Casitas Avenue, Atwater Village, CA 90039

Date: Friday March 17, 2017

To: Jonathon Chang, City Planning Department
Room 750 Metropolitan Projects
City Hall, 200 N. Spring Street
Los Angeles, CA 90012

**Case numbers: ENV 2016-2862-EIR,
CPC 2016 3054-General Plan-Vesting Zone Change
Density Bonus,
Community Design Overlay Site Plan Review
Vesting Tentative Tract Map-74366**

Dear LA City Planning Commissioners and Staff:

We are sending this letter, because as residents we feel there will be great impact caused by this project on the neighborhoods of Atwater Village and Elysian Valley. We reviewed the Initial Study and the Notice of Preparation for the Bowtie Lofts, 2750-2800 Casitas Road, Los Angeles, CA 90039 and offer these comments:

Shifting Planning Paradigm

The Developer is requesting new zoning, and a new general plan designation that violates the spirit of archive of LA River Plans and restoration studies of the LA River should be restored and redeveloped. We would request that the City Planning Department comment on how the requested zoning may in fact have a negative impact on the site and surrounding properties and they should comment on whether their project complies with the **LA River Revitalization Master Plan** (LARRMP) adopted by the City in 2007.

There appears to be a shifting in policy regarding the long-term community plans. We hope the city adopts new community and general plans soon, to address the lack of a planning framework for parcels like Bowtie Lofts, and others. One portion of the site was rezoned from manufacturing to public facilities in 1999. Another portion was rezoned following adoption of Glassell Park-Cypress Park Community Design Overlay, (2009.) However, the City omitted answering the question or providing the information about whether the project is consist with current land use plans. It is not.

Now the US Army Corps of Engineers and the LA County Department of Public Works are working with the City's Bureau of Engineering on implementing US ARBOR 20, a fluvial-geomorphological study of this 11 miles of LA River, including the bowtie site.

In addition to not requiring a hydrological study in this initial study/Notice to prepare, the City also did not include a traffic study or a haul route.

Scoping and Initial Study Comments-Bowtie Lofts 2750-2800 Casitas Avenue, Atwater Village, CA 90039

Following the adoption of the Los Angeles River Revitalization Master Plan in 2007 properties in Cypress Park and Glassell Park were rezoned as part of the Community Design Overlay which was adopted in 2009. Developer is seeking an exemption from the existing Community Design Overlay. They should be required to abide by it and other voluntary standards, as well as to preserve the Public Facilities zoning on site.

In addition there are easements that need to be clarified, in terms of access to the Bowtie Lots site. We have identified that there is no property address in ZIMAs for 2800 Casitas however, this is the main address for the existing building permit, pulled in 1999. There is also a state owned parcel (5442 -002-914) that appears on the assessor maps, under state ownership. Yet it seems to be part of this developer application. The March 2 checklist mistakenly states there is only one parcel zoned industrial manufacturing. The July 2016 filing, stated the one parcel was zoned PF. The March, 2017 filing recants that, and states the one parcel is heavy Manufacturing currently. How many parcels are part of this project? Please list them by assessor number. Please explain why there is no property at 2800 in Zimas however, the 1999 building permit lists 2800 as the property address.

Design Guidelines

We urge the City to require compliance with the LA River Design Guidebook (LA City, 2016), and one condition be added to their subdivision map, to ensure that the project “celebrate[s] community character and culture; improves environmental sustainability and health...of the LA River... and reflect LA’s unique identity. “

On page 63 of the LA River Design Guidebook are types of riverfronts and green street proto-types for properties in the RIO zone. The use of permeable surfaces, landscapes, porous concrete, and pebbles to “capture, infiltrate, and reuse storm water runoff in parking areas. The project should implement onsite treatment Best Management Practices to the greatest extent possible to avoid or minimize potential water-quality impact and it should implement water saving techniques, such as using recycled water for landscaping irrigation of common areas and toilets. Unfortunately, the developer of this project, has also requested to be exempt from the RIO overlay zone. We expect the City to enforce and apply all of its RIO District planning standards and design guidelines on this and all projects in the LA River zone.

The city must fund new planning and public investments in public trails, parking, and natural open spaces as part of implementing the new parks at Bow Tie Project and the G-2 parcel. This development must pay the new full QUIMBY fee adopted at the end of 2016 to mitigate the impact of 419 units or 1000 residents on the public resources in the vicinity of Taylor Yards-LA Historic Park. The US Army Corps of Engineers certified their EIR/EIS for the US ARBOR Alternate 20 project.

Project description

The project description has incorrect information about the current zoning and the parcels involved. City Planning Department should reach out to the Office of

Scoping and Initial Study Comments-Bowtie Lofts 2750-2800 Casitas Avenue, Atwater Village, CA 90039

the Mayor Riverworks Team, the US Army Corps of Engineers and the Los Angeles County Flood Control District to ensure timely review and comment.

Previous actions

The case was previously submitted in July 2016. The City and the developer recommended an MND but the Atwater Village Neighborhood Council Environmental and Land Use Committee recommended additional environmental review. This information was omitted.

Project Location

The site contains two general zoning classifications on the site. One is zoned manufacturing, and the other is zoned public facility. These appear on ZIMAS as two separate properties. However, in the city's application the applicant describes the site as one sole parcel. This needs to be explained. The Glendale Freeway is not accessible from project site. The site is located south of the Southern Pacific railroad tracks, and a 12-foot berm, and will flood when it storms.

Traffic

The maximum automobile trips allowed to this site per hour, or per peak period needs to be clarified. It is possible that this project could totally overwhelm the existing level of service of local streets. A traffic study which examines all of the potential impacts and provides a mitigation and monitoring plan should be done, taking into account future large scale developments nearby. The site could pose a dangerous situation due to the very limited access, and with 1500 residents, and over 700 parking spaces, we would suggest that there may be a significant impact caused by traffic, on local streets, and Fletcher, Riverside, San Fernando Road, and the already impacted intersections at Riverside Drive and and Fletcher, the Five Freeway and Fletcher, and the intersections at Rowena and Glendale Boulevard.

Fire Safety and Public Access

Required fire safety response time needs to be assessed in the draft EIR, as it is of major concern to neighbors and stakeholders. In the event of a railroad emergency at this location, access to the site would be difficult for emergency responders. This question came up at a focus group meeting with representatives of State Parks and with Clockshop who programs Bowtie for State Parks. Last summer the site was used by Elysian Valley Artwalk patrons and Bowtie Project visitors. When the 500 cars were leaving the park at the same time, a potentially dangerous situation was created. Evacuation was slow causing the event organizers to call California State Parks to direct traffic.

Affordable Housing

Scoping and Initial Study Comments-Bowtie Lofts 2750-2800 Casitas Avenue, Atwater Village, CA 90039

There are concerns about approving zone changes from heavy industrial to limited industrial for a housing project. However, housing is in very high demand. The problem is that the existing area is low-moderate income housing, and this rental housing, currently, does not have an adequate affordable housing component. Should the six entitlements be approved, the developer should be required to provide the maximum amount of low income units in this case, 35% per state density bonus law.

Comments on the CEQA Check list (Initial Study):

I. Aesthetics

- a. The project will have significant impacts on the view sheds from the river easements. Los Angeles County Flood Control District, United States Army Corps of Engineers, Los Angeles Department of Water and Power, Mountains Recreation Conservation Authority, Los Angeles Conservation Corps, and the City's Bureau of Sanitation must be consulted regarding river access, safety and security, and development of future public use access off the East Bank.
- b. The project's immediate adjacency to the River requires design and orientation towards the River and well as ground-level access from the project to the River, as outlined in the River Improvement Overlay Zone.

IV. Biological resources

- a. Project could significantly impact habitat on state parcel, and on the LA River, a major migratory route and unique riparian corridor for animals and flora.
- b. Project will definitely have significant impact on the riparian corridor.
- c. Project could impact vernal pools or federally protected wetlands in the river or on site.
- d. Project definitely will impact movement of fish and birds on a well established native resident and migratory animal corridor.
- e. There are policies that call for on-site treatment of storm water in areas adjacent to the LA River; This project might add potentially significant impacts to river and water quality.
- f. The city and the US Army Corps of Engineers (USACE) adopted an EIR/EIS for the Alternative 20 of the Los Angeles River Ecosystem Restoration Study (a.k.a. ARBOR) which includes extensive wetland and open space restoration on parcels such as the adjacent G-2 and Bowtie project. The approved alignment recommends in-channel modifications directly adjacent to the proposed project

VI. Cultural Resources

- a. Attachment B does not constitute a historic resource survey; this project could cause a substantial adverse change to a historic resource. Given the historic pattern of use at the site, it is likely that there may be some artifacts of Native California Indians of 18th or 19th century. Please review recent EIR's on public projects, because the data sets referenced in the cultural resources study are incomplete for Southern California.

Scoping and Initial Study Comments-Bowtie Lofts
2750-2800 Casitas Avenue, Atwater Village, CA 90039

- b. Disturbance of this site, could significantly impact archeological resources.
- f. There are some cultural resources on site. Developer must conduct an extensive historic survey of the site.

VII. Hazards and Hazardous Materials

- h. The Project is adjacent to 100 acres of brownfield park and open space. The sites previously owned as maintenance yards or Southern Pacific are believed to be contaminated on the surface and in the aquifer.

VIII. Hydrology and Water Quality

- c. The site was a railroad maintenance yard until it was sold by the rail road in 1998. At that time, it went through some type of review by the Regional Water Quality Control Board. The ground water in this area is also contaminated. New residential and commercial uses have a stricter standard for soil and water quality and will need to be analyzed in the project's DEIR.
- d. The new development would significantly alter the drainage pattern on the site which currently conveys storm water from the adjacent streets into the river, during a storm event.
- e. The Project will substantially alter the drainage patterns of the site. There is very likely to be potentially significant impacts on the rate of surface runoff, flooding on or across the site. We found a historic sycamore creek easement across the property, signaling a regional temporal stream that may need to be mitigated.
- f. It is very likely that the new project will create or contribute to storm runoff exceeding the capacity of existing storm water drainage system. Additionally the project might provide substantial sources of polluted runoff therefore this question of hydrology must be checked as potentially significant impact unless mitigated.
- g. The project places housing in the 100-year flood plain as mapped on Federal Flood Hazard Boundary, Flood Insurance Rate Maps and on other flood hazard delineation map. The US Army Corps of Engineers recently released updated flood modeling of the area. The project should conform to the flood risk mitigations necessary for the most updated modeling.
- h. Since this project places new structures in the 100-year flood plain, project flood flow rates could create significant impacts and should be studied and mitigated.

X. Land Use and Planning

- a. The project may have a significant negative environmental impact on the public's access across the site.

Scoping and Initial Study Comments-Bowtie Lofts
2750-2800 Casitas Avenue, Atwater Village, CA 90039

- b. The project will have a potentially significant impact on the habitat conservation plan being proposed by the Nature Conservancy, the US Army Corps of Engineers, and the State of California Resources Agency.

In addition, given existing plans by the California State Parks, the city of Los Angeles, and the United States Army Corps of Engineers plan to use the nearby Bowtie Parcel as a core of an ecologically vibrant and publicly accessible open space on the River. The project land use and design should not adversely impact nor hinder continuity and connectivity to the Bowtie Parcel, Elysian Valley and Glassell-Cypress Park. Given the height variance requested, the project would be detrimental to the enjoyment of future users of Bowtie Park. The planning Department should accept invitations to speak with small groups to explain these projects and collect some data from stakeholders, on best design and management practices for this site.

XII. Noise

- a. The project will create loud noise for this area during construction and ongoing, with the buzz of lights and electricity. It is potentially a significant environmental impact and should be analyzed in the DEIR. There is background noise already.

XIII. Population and Housing

- d. This project places housing population within a tract identified by CalEnviro as having a 99% pollution burden.

XVI. Transportation and Traffic

- d. The new project could create an unsafe situation, resulting in a change in traffic patterns and increases in traffic levels through the residential neighborhood, that could result in substantial safety risks to pedestrians. Community members and long time businesses have already voiced concern that potential resulting traffic impacts would be significant to their path of travel and their quality of life.

XVII. Tribal Cultural Resources

There may be a potentially significant impact on historic resources that have not yet been documented. A historic survey by a firm that specializes in Southern California Historic Cultural Monument must be hired to assist the developer's consultants. There is historic research for the Cornfield Historic State Park, and for Taylor Yards LA River Park. The applicant and the City should review the EIR-EIS for US ARBOR Alternative 20 (20015-2016), There is a data center for artifacts at CSU Fullerton.

XVIII. Utilities and Services

- a. California State Parks, The US Army Corps of Engineers, The LA County Flood Control, the Regional Open Space District, the Mountains

Scoping and Initial Study Comments-Bowtie Lofts
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Recreation and Conservation Authority, the Atwater Village and Glassell Park Neighborhood Councils and the National Parks Service Trails Division use utilities and services. The addition of 400 units, 1,000 residents and 700 cars, exceeds the existing utilities and services currently available at this site and would create significant impacts requiring mitigations.

Alternative Projects for Study in the Draft EIR

Given the nature of the site, and the importance of the river as a recreational resource, as well as a natural habitat, and a catalyst for economic and social development, we request that the developer and the city present a robust Alternatives study with input from City Departments, County agencies, State Agencies, federal agencies and stakeholders.

- a. A zoning scheme for residential uses at various densities and price points.
- b. Preservation Public Facility zoning
- c. A pedestrian oriented alternative with access to public transit, and visibility and access to Casitas and Glendale Boulevard.
- d. An Alternative that includes up to 35% affordable rental units for low income seniors, or families or special needs population.
- e. An alternate that improves visual and public access from the street to the River with way-finding and educational signage.
- f. An alternate that shows a reduced mass. Current project may cast shadows into the River that could preclude ecological sustainability and future restoration. The DEIR should provide a sun study and should assess impacts from shading on River ecology.
- g. A by-right alternative that is permissible within existing general plan, zoning, and height district.

We look forward to reviewing the project's draft environmental impact report. Please notify us of upcoming meetings and hearings.

Sincerely,

**Karen Barnett
2971 Sunnynook Drive
Los Angeles, CA 90039**

**Carrie Sutkin
2438 Gatewood Street.
Los Angeles, CA 90039**



Jonathan Chang <jonathan.chang@lacity.org>

419 New Apartments on the LA River - NO

anne.dailey@sbcglobal.net <anne.dailey@sbcglobal.net>

Mon, Mar 13, 2017 at 4:43 PM

Reply-To: anne.dailey@sbcglobal.net

To: "jonathan.chang@lacity.org" <jonathan.chang@lacity.org>

PLEASE say no on this for so many reasons!! The LA River is just starting to come back. This is wrong for our neighborhood.

Thank you
Anne Dailey
2814 Estara Ave
323-559-5744



Jonathan Chang <jonathan.chang@lacity.org>

ENV-2016-2862-EIR (Bowtie Lofts Project)

Norman Dixon <normanpdixon@hotmail.com>

Fri, Mar 17, 2017 at 7:19 AM

To: "jonathan.chang@lacity.org" <jonathan.chang@lacity.org>

Dear Jonathan Chang,

I am a homeowner and live at 3024 La Clede Avenue between Fletcher Avenue and Carillon Street. I am extremely concerned about the development of the Bowtie Lofts Project near our neighborhood.

In this area of Atwater, only Larga and La Clede have traffic lights. La Clede is the street closest to the Bowtie parcel, so it is used more than any other street to access the Bowtie. With just the businesses that already exist there and the other activities taking place there, traffic is already heavy and dangerous on our street. Everyone coming from the existing businesses around the planned site already use La Clede to get to the 2 freeway. It is extremely busy when work shifts start and end. It is unthinkable to consider what traffic on our street would be like if an additional 1000+ cars per day were driving down La Clede to access a 419-unit development. This would be detrimental to our quality of life and the value of our property.

There needs to be very serious consideration about how the traffic from the Bowtie Lofts Project would be directed through our neighborhood, including the possibility of closing La Clede to through traffic and adding speed bumps. I would also request that you consider greatly reducing the number of units allowed to be built back there, and finding alternative points of access to the parcel -- possibly from San Fernando Road.

Thank you for your time regarding this matter.

Sincerely,

Norman Dixon
3024 La Clede Avenue
Los Angeles, CA 90039



Jonathan Chang <jonathan.chang@lacity.org>

Bow Tie Lofts Yard Project Casitas Avenue Los Angeles, CA- Public Comment

Jim Kiehl <jekiehl@earthlink.net>

Sun, Mar 12, 2017 at 4:35 PM

To: Jonathan.chang@lacity.org

email to Jonathan Chang at LA City Planning.

From Jim Kiehl – Resident of Glassell Park section of Los Angeles

Re: ENV-2016-2862-EIR

Bow Tie Lofts Yard Project Casitas Avenue Los Angeles, CA

My name is Jim Kiehl, I am an 18 year resident of Glassell Park. Most of the years I have lived here I have been involved in community activism mostly through the Glassell Park Improvement Association GPIA. I am familiar with development issues in our community. Further, I am very familiar with the proposed project site as the GPIA has co-hosted with FOLAR the annual river clean-ups at the Site where we are given access to the river through the Nelson Miller facility that is one of the current occupants of the site.

The largest problem with this proposed project is access to the location. Currently there is only one way in or out of the location. These are narrow residential streets running to a single street, Casitas Avenue that runs parallel to the train tracks under the Glendale freeway to the site and terminating at the North end of the Bow Tie Parcel. To the west of the site is the LA River. There is no access from the east due to the train tracks and none to the south currently. There is discussion of some type of bridge in the G2 parcel, quite a bit to the south of the proposed project but this will not provide access to the project location itself.

419 residential units and retail space will have 1000 or more people living in a space where none currently live but about 150 work. This will add at least 1000 trips a day to Casitas Avenue and the narrow neighborhood streets from the freeway up to Fletcher Drive. This would be a significant negative impact to this neighborhood on an everyday basis. It could be quite challenging to get emergency first responders to the site in the event of an emergency. In the event of a train accident in the area, or an earthquake causing a failure of the freeway bridge over Casitas and the train tracks it would be possible to cut off all access to the site.

I note this risk exists today for the 150 or so people who work in the existing buildings on the site. Building the proposed project on this site with the current access would spread this risk to at least 1000 people who would be at the site more than the typical 8 hour work day. This suggests at least a 10 fold increase in these access risks from the current risk if this project is built as proposed.

This risk could be reduced by developing a second access route to the site. Currently, the on ramp to the 2 freeway north that runs from Fletcher Drive roughly parallel to the LA River gets next to the site on it's north west corner before it turns north and heads up on to the freeway. Changing the ramp to a 2 way street to go under the freeway and then in to the site would improve access and avoid much of the negative impact to the neighborhood around Casitas. This street would have to have some traffic control to allow for northbound traffic off the site and for south bound traffic to go to the altered Freeway on ramp to continue to the Northbound 2 freeway as it does now. This access point would have to travel over the river frontage just south of the freeway. Thus necessitating some movement of the high voltage power transmission line that currently has a tower in this space. In essence this would be an expensive fix with a significant improvement of access to the proposed project site for both day to day use and emergency responses by city departments. It could also help with delivery of utilities to the site, Water, power, Sewer and the like.

Please take these issues in to consideration when this project is reviewed.

James Kiehl

4665 W. Avenue 41

Los Angeles, CA 90065

Past President of the Glassell Park Improvement Association

Chair of GPIA's Sidewalks and Street Trees Committee



Jonathan Chang <jonathan.chang@lacity.org>

Bowtie development

Devin Kreider <devinkreider@yahoo.com>

Fri, Mar 17, 2017 at 2:12 PM

To: Jonathan.Chang@lacity.org

Dear Jonathan Chang,

I've lived at 3024 1/2 La Clede Avenue between Fletcher Avenue and Carillon Street for over 10 years. I'm very concerned about the proposed development of the Bowtie Projects that are being planned.

In this area of Atwater, only Larga and La Clede have traffic lights. La Clede is the street closest to the Bowtie parcel, so it is used more than any other street to access the Bowtie. Traffic is already heavy and dangerous on our street (1 block). Everyone coming from the existing businesses around the planned site already use La Clede to get to the 2 freeway. It is extremely busy when work shifts start and end. To add an additional 1000+ cars per day driving down La Clede to access a 419-unit development is unacceptable and frankly irresponsible. This would be detrimental to my quality of life.

This project should not move forward since the current infrastructure is not sufficient to support that amount of traffic.

Thank you for your consideration.

Sincerely,

Devin Kreider
3024 La Clede Ave
Los Angeles, CA
90039

Sent from my iPhone



Jonathan Chang <jonathan.chang@lacity.org>

ENV-2016-2862-EIR

karen ortblad <kortblad@gmail.com>

Fri, Mar 10, 2017 at 5:21 PM

To: jonathan.chang@lacity.org

Personal and confidential re: new 419 apt development.

GPIA Glassel park resident 21 years. A lot of Nimby's Challenge every change and growth in area. I believe a development would be beneficial. GPNC land use sent us Nimby shouts of BowTie "our "park!"

The place is scary at night and un-developed. Crime, dumping, homeless camps, etc. A well planned development provides housing, new infrastructure and life/community safely for all along the River.

With consideration for ingress/egress, could be managed and provide city property +taxes which could support local improvements.

an aside in general, since I have taken a little voice time..I do not attend most meetings, always very vocal in one direction. Many people own view residential lots in the hills and the OPEN Space LA

shouts about stopping a single small development or several houses within rights and ordinances of a builder, yet NELA Open never raise/spend money to purchase a lot, just use delay tactics or lawsuits.

Wise infill better than freeway commuters from afar that must drive in due to no housing stock.

Thank you, my opinion,

Please keep off a public record. Some neighbors rabidly anti growth. Some do not see that position is a certain selfish interest. LA as any city must grow (not outward) and change to thrive.



Jonathan Chang <jonathan.chang@lacity.org>

RE: ENV-2016-2862-EIR (Bowtie Lofts Project)

Patrick Owen <patrickdeanowen@gmail.com>

Fri, Mar 17, 2017 at 7:48 AM

To: Jonathan.Chang@lacity.org

Dear Jonathan Chang,

I am a homeowner and live at 3024 La Clede Avenue between Fletcher Avenue and Carillon Street. I am extremely concerned about the development of the Bowtie Lofts Project near our neighborhood.

In this area of Atwater, only Larga and La Clede have traffic lights. La Clede is the street closest to the Bowtie parcel, so it is used more than any other street to access the Bowtie. With just the businesses that already exist there and the other activities taking place there, traffic is already heavy and dangerous on our street. Everyone coming from the existing businesses around the planned site already use La Clede to get to the 2 freeway. It is extremely busy when work shifts start and end. It is unthinkable to consider what traffic on our street would be like if an additional 1000+ cars per day were driving down La Clede to access a 419-unit development. This would be detrimental to our quality of life and the value of our property.

There needs to be very serious consideration about how the traffic from the Bowtie Lofts Project would be directed through our neighborhood, including the possibility of closing La Clede to through traffic and adding speed bumps. I would also request that you consider greatly reducing the number of units allowed to be built back there, and finding alternative points of access to the parcel -- possibly from San Fernando Road.

Thank you for your time regarding this matter.

Sincerely,

Patrick Owen
3024 La Clede Ave
Los Angeles, CA
90039

March 15, 2017

Jonathan Chang, City Planning Department
Room 750 Metropolitan Projects
City Hall, 200 N. Spring Street
Los Angeles, CA 90012

RE: ENV 2016-2862- EIR, CPC 2016 3054-GP- VZC, DB, CDO SPR, VTT-74366
Bowtie Lofts, 2750-2800 Casitas Road, Los Angeles 90039

Dear Mr. Chang,

I recently attended the March 1 scoping meeting for the above referenced project proposal and found the proposed zone change and General Plan amendment completely inappropriate from multiple standpoints, including traffic and access, ecology, biology, hydrology, cultural resources, utilities and zoning. The Initial Study prepared by Parker Environmental Consultants also contains several inaccuracies.

We in Atwater Village are at a disadvantage with regard to this specific project: Page IS-1 incorrectly locates the project in Glassell Park. However, the subject properties, and only a couple of other parcels that fall south of the 2 freeway, are actually part of Atwater Village, yet are represented by CD1, rather than CD13, as is the case with almost all of the rest of our Village. Due to this, we have no relationship with the Council office that represents this property. Clearly its Council representative has no interest in, nor regard for, the opinions of Atwater residents. On no occasion has he interacted with Atwater residents. Also, curiously, the project is considered part of the Glassell Park Community Design Overlay, yet the only access to the project is through the mainly residential, undersized Atwater streets developed in the 1920's. There is NO ACCESS to the project site from Glassell Park. The nearest major road, Fletcher Drive, particularly between Rowena and San Fernando, is already overburdened, while there is presently a major residential project underway on Riverside Drive, and others planned for the near future, which will further stress this road that there is no way to enlarge. There is also no access to public transit, making it incompatible with the City's plans for new large scale developments to be in transit corridors.

I'm certain that the City Planners are well aware that the existing access to the proposed Bowtie Lofts site is wholly inadequate. It is, in fact, acknowledged in the Initial Study, where "the inability to implement emergency response or emergency evacuation plans" is checked under the Environmental Impacts sections. This is already true even before soil remediation of G2 begins in the near future, bringing in unknown numbers of oversized equipment to the area. Clearly it is inconceivable that the Fire Department and other first responders would deem the single narrow egress from the site to be acceptable. What if there were a fire, flood, earthquake, oil spill, train crash or other emergency? The freeway could even potentially collapse in an earthquake, as has happened previously in L.A. and elsewhere in the state, leaving Bowtie Lofts residents

trapped. Though it hasn't been discussed with the residents of Atwater Village, there apparently must be a second route planned to the future parkland (G2 owned by the City, and Bowtie owned by the State. If this is the case, do the Bowtie Lofts planners/ developers intend to capitalize on this future Southern access route? If so, it would mean that not only do they think some portion of our parkland should be used for a road to benefit them alone, but that the taxpayers should fund "their" road. Furthermore, the current northern access, according to the assessors map requires the developers to use Bowtie Parcel (state land) for access to their property. Currently this doesn't appear to be a problem, but will be upon development of the State owned Bowtie Park.



In addition to the inadequacy of existing street infrastructure, the existing plumbing/ sewage on-site infrastructure is virtually non-existent. The addition of infrastructure to the almost 490,000 s.f. new development will undoubtedly cause stress where it connects to the surrounding aging infrastructure, causing pipeline explosions similar to those we've witnessed throughout the City in the past couple of years. This would need to be taken into consideration, and improvements to the surrounding area planned for in any project budget. Yet, on Page A-13 XVIII UTILITIES AND SERVICE SYSTEMS item c (Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?) they have checked "Less Than Significant Impact", which personally I find implausible. Also, the addition of over 1,000 cars and trucks serving the residences and commercial facilities will no doubt add polluted runoff to the groundwater.

The height change of 85 feet that was requested in the original proposal, has now been increased to include a commercial rooftop greenhouse, bringing additional oversized vehicles to the site, and increasing the blight the project will cause to the surrounding area, including Elysian Valley across the river, and the future adjacent parks. There is

no comparable facility in the area, nor was there ever planned to be, as evidenced by the lack of applicability to the Residential Citywide Design Guidelines, which are part of the Planning application. This checklist references issues relating to how a development interfaces with its neighborhood, such as “all street-fronting units have a primary entrance facing the street”(1.2); “required yards” should not “negatively impact the overall street”; retail establishments shall incorporate “at least one usable street-facing entrance...”; ...”maximize a visual connection to the street...”; “Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood...” (not checked because of inapplicability. (1.3); “Porches and stoops can be used to orient housing towards the street and promote interesting neighborhood streetscapes.” (2.1), etc. Sections 3.2- Crosswalks/Street Crossings for Large-Scale Developments and 3.3 On-Street Parking are also completely inapplicable. Clearly the Checklist is irrelevant to this project as it is not part of a neighborhood, but a stand alone project which seeks to capitalize on river revitalization and the creation of City and State parks. Even if the units are used for housing, and not for short-term housing, (which they will be if developments elsewhere in the City are any indication) the project is still inappropriate for the site. However, if it does go forward, Air BnB’s and the like must be expressly disallowed.

The parcel for which a discretionary zone change is being requested is zoned Public Facility. The need for river adjacent Public Facility land is incorporated into the LA River Revitalization Master Plan Executive Summary published in April 2007. Under the *Capture Community Opportunities* section of the Revitalization Master Plan Goals we find:

- . Make the River the Focus of Activity
- . Foster Civic Pride
- . Engage Residents in the Community Planning Process and Consensus Building
- . Provide Opportunities for Educational and Public Facilities
- . Celebrate the Cultural Heritage of the River

This site, adjacent to land already purchased by the State park system and now known as Bowtie Park, was already zoned Public Facility in 1999, when it was changed from PF-1 to PF-1-CDO, according to Zimas Reports, apparently having been identified earlier as a beneficial site for some kind of public facility, in keeping with the City’s plans for river revitalization, clearly intending any future uses to align with revitalization goals. A fire station to serve the adjacent parks is one potential public facility that could be beneficial to the general public. Its proximity to both the park and the soft-bottomed portion of the river would also make it an ideal setting to learn about riparian habitats and water resources and issues, as well as the ancestral people to whom this river was beloved. Most importantly, the land could and should be used to help with citywide water infiltration and storm water capture efforts.

Importantly, Alternative 20 (ARBOR) shows the will of the people, the L.A. City Council, and Congress, who approved this Environmental Document in 2016, to restore the river’s ecosystem. Also, as you know, the Nature Conservancy recently completed a two year study of the River’s plants and wildlife in the area, with the objective of laying

out various scenarios of how River restoration could be carried out. Their recently disseminated final report states that restoration of River and adjacent land must be considered as a whole. Quoting from the Executive Summary:

Prioritize Complementary Habitats: Enhancing and increasing the amount of perennial riparian habitat in-stream alone will not create as much biological value as identifying complementary enhancement opportunities outside of the River channel in adjacent upper terrace floodplain and upland habitats...

River Adjacent Land Use: Land uses adjacent to the River and throughout the watershed are a part of the solution and part of the Los Angeles River's biological and hydrologic system. The landscaping and hydrology of these areas should be designed to provide a value-added role to the habitat functions of the Los Angeles River ecosystem.

With regard to the native inhabitants of this site, Section V. CULTURAL RESOURCES on Page A-7 discusses impacts. Item c. (Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?) does have **Potentially Significant Impact** checked. The other items are claimed to have little or no impact. However, the report by the California Historical Resources Information System at the South Central Coastal Information Center, California State University, Fullerton states that "Due to the sensitive nature of cultural resources, archaeological site locations are not released." It is known that boats found along our City's coast have been carbon dated to 15,000 years, so the native people were clearly here that long at the very least. Having relied upon the river and its resources for so many thousands of years, it is likely that their artifacts and remains are likely to be found in any substantial dig, as they have been elsewhere in the City. Much of the adjacent land has been capped by concrete for over 100 years, so the Cultural Resources, which were of no interest at the time, are unknown, but must be specifically protected.

From the LA River Revitalization Master Plan:

"The plan is intended to be a 25-50 year blueprint for implementing a variety of comprehensive improvements that would make the River one of the City's most treasured landmarks and a catalyst for a sustainable environment."

Curiously, in the EVALUATION OF ENVIRONMENTAL IMPACTS section of the Planning study, Biological Resources and Hydrology/Water Quality are **NOT CHECKED** on Page A-4 under ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED. Also on Page A-4, under AESTHETICS, they have incorrectly checked "no impact" for:

- a. Have a substantial adverse effect on a scenic vista? and
- b. Substantially damage scenic resources....

Similarly, in the ENVIRONMENTAL IMPACTS checklist which follows, seven of the eight sections claim to have less than significant, or no impact. (Item g has "significant impact" checked for the inability to implement emergency response or emergency evacuation plans.) The other seven include such items as habitat modification for sensitive species, riparian habitat, federally protected wetlands, migratory fish, biological resources, and local, regional, or state habitat conservation plans. These

seven *incorrectly* claim to have no impact, as evidenced by the City's recent purchase of the G2 parcel, the State owned Bowtie parcel, the federal ARBOR Study and Congressman Adam Schiff's proposed Rim of the Valley study. Also, the land adjacent to the proposed buildings are known to have significant contamination from solvents used in railroad maintenance and repair. Therefore, it is unlikely that the development site could be clean, and bringing it up to residential standards will be entirely different from the standards for Heavy Manufacturing when the existing building was constructed in 1999. Currently this area is part of the San Fernando superfund site known as the Pollack area, EPA region 9 area 4, to be further investigated March 2018 through November 2021. (EPA September 2016 CIP.)

Clearly this proposed project lacks respect for our neighborhood and L.A.'s River revitalization efforts as a whole, since all of the issues discussed here regarding riparian habitat and water quality have been the subject of decades long discussion by multiple City, State and Federal entities and agencies. The proposed project also falls outside of all Planning Department norms, as evidenced by it's need for zone and height changes and a General Plan amendment in order to go forward. The proposal essentially builds out 100% of available land, while blocking access and views to and from the L.A. River, and capturing planned park areas funded by all residents of Los Angeles to benefit its few. If allowed to proceed as proposed, this project would create incompatible land use for the L.A. River projects which have been planned prior to the passage of the Los Angeles River Revitalization Master Plan in 2007. The Army Corps of Engineers, as well as the City led Gehry study, are currently analyzing the existing River channel, and these studies must be taken into consideration. It is entirely inappropriate for such a project to go forward until an overall plan for the area is complete. This is the very purpose of City Planning! Planning must not continue to be approached piecemeal, especially in a site so vital to River revitalization. The River, its channel and levee, and future parks need to be analyzed as a whole. Doing so will show, I believe, the negative impact of this project to future River restoration efforts, and the ability of the general public to enjoy the future parkland.

Sincerely,



Cheryl Roberts
Atwater Village Resident



Jonathan Chang <jonathan.chang@lacity.org>

ENV-2016-2862-EIR

Melissa Roth <pet.concierge@yahoo.com>

Fri, Mar 17, 2017 at 8:34 AM

Reply-To: Melissa Roth <pet.concierge@yahoo.com>

To: "Jonathan.Chang@lacity.org" <Jonathan.Chang@lacity.org>

16 MARCH 2017

Jon Chang, Planning Assistant
Major Projects & Environmental Analysis Section
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: ENV-2016-2862 EIR

Please accept the following email as official comments on Environmental Issues and Impacts of the Bow Tie Lofts Project. I have also attached a .pdf file of the same.

As a home and small business owner in Atwater Village, I strongly object to the size and scope of the Bow Tie Lofts project. I live in the small pocket of homes that will be directly impacted by the proposed project. My neighborhood is 5 Blocks x 1 Block, locked in by the 2 Freeway and the railroad tracks. We are barely 100 homes, with the accompanying cars, that already deal with poor traffic planning on and off Fletcher, from San Fernando to Riverside. The lack of traffic lights at on/off ramps for both 2 and 5 freeways make it difficult to get in and out of the neighborhood safely.

It is an absurd idea to jam 400 homes (probably 800 cars) and commercial units (more cars) into a property that has only one driveway for access and only one road, in or out, which leads directly into our tiny pocket neighborhood. It is too much traffic for our 6 streets to handle! Quality of life would be diminished.

Following are more concerns about environmental issues and impact:

Safety Hazard

The cul-de-sac at Bow Tie is a closed end system. Right now there are 2 driveways to lots with businesses, and the entrance to the river park that make up the little pocket where Casitas dead-ends. How will emergency vehicles and first responders access the property while 400 homes plus commercial units are attempting to evacuate on the same little street? There is no emergency exit.

Public Access to the River & Park

The entrance to Bow Tie Project and the LA River will be greatly impacted by this project. The Casitas entrance is the single access point to the east side of the river for Atwater Village and the surrounding community. The newly purchased Taylor Yard is being hailed as the 'crown jewel' of the proposed revitalization of the LA River. Accessibility to the park should be a top priority for the city. This mixed-use project jeopardizes public access to our riverside park.

Air Quality

What remediation will be used to limit the amount of dust and other airborne particulates during demolition of the existing buildings and new construction?

Water Quality

What is the plan for storm water management on the property? All rain runoff from the project site, during and after construction, goes directly into the river. Will the property use porous pavement to capture rain and replenish ground water? Will you capture and use storm water to irrigate property landscaping? Will the buildings use grey water for landscape irrigation?

Thank you,

Melissa Roth
3041 Atwater Ave.
Los Angeles, CA 90039-2401
(323) 669-2713

the pet concierge (213) 999-0327 www.canineclubla.com



ENV-2016-286 EIR.pdf
43K



Jonathan Chang <jonathan.chang@lacity.org>

RE: ENV-2016-2862-EIR (Bowtie Lofts Project)

Aaron Skillman <skillzie@gmail.com>

Thu, Mar 16, 2017 at 9:56 PM

To: Jonathan.Chang@lacity.org

Dear Jonathan Chang,

I live at 3030 La Clede Ave between Fletcher Ave and Carillion St.
We have lived in and owned this house since 2004 (13 yrs).

I am concerned about the development of the Bowtie Lofts Project near our neighborhood.

What really bothers me is the increased amount of traffic that will be directed through our neighborhood and past our house. We have two small children ages 1 and 3. The street is already very busy with business traffic coming from that area. I feel the increased amount of traffic will be detrimental to our quality of life and also dangerous for our young ones. Our street on La Clede is very narrow. We have had multiple accidents on our parked cars over the years from drivers swiping our cars because of this.

In this area of Atwater, only Larga and La Clede have a traffic light. Everyone coming from the existing businesses around the planned site use La Clede to get to the 2 freeway. It is very busy when work lets out. I can't imagine how busy it will be when 1000+ cars are zipping by when a 419 unit project goes in.

There needs to be very serious consideration on how the traffic from 419 units of the Bowtie Lofts Project will be directed through our part of Atwater Village.

Please consider reducing the amount of units going in. We would also request "No Through Traffic" status on La Clede and speed bumps put in.

Thank you for your time regarding this matter.

Sincerely,

Aaron Skillman
3030 La Clede Ave
Los Angeles, CA
90039

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Transportation
- Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

I am very concerned about the additional traffic this project will generate, worsening the conditions, increasing wear and tear on an already crumbling streets, stressed infrastructure

I am very concerned that this project will either completely close off, or restrict access to a future re-develop, East bank riverway, up to and including bike paths, boardwalks, public parks and open spaces.

I am concerned about the proposed height and scale of this project, and how it might come to dominate a future restored LA River habitat, ecosystems and wildlife preserve (should that come to pass). We need development with low-impact, sustainable planning that harmonizes with the natural environment.

Road access. As planned, having only one way in and out is unacceptable.

CONTACT INFORMATION (Optional, please print clearly)

Name: Jeff Yana Representing Agency or Organization:

Address: 3029 Englehole Jeff City/State/Zip: 90039